



CITY OF BELLEVUE

2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

Final Environmental Impact Statement Appendices



City of Bellevue

Community Development Department
450 110th Avenue NE
Bellevue, WA 98004

February 2024



BELLEVUE 2044

COMPREHENSIVE PLAN

Building A Livable City for All

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BELLEVUE 2044
COMPREHENSIVE PLAN

Building A Livable City for All

APPENDIX C Traffic Data Revised

Bellevue Comprehensive Plan EIS Appendix - Mode Share

City of Bellevue Workers (Tour includes a workplace within the City of Bellevue)

Mode	2019				No Action				Alt 1				Alt 2			
	All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	171	5.7%	1,423	1.2%	5,711	7.6%	2,239	1.2%	18,471	7.5%	2,994	1.3%	18,816	7.6%	3,224	0.4%
Bike	181	0.1%	159	0.1%	267	0.1%	232	0.1%	346	0.1%	298	0.1%	347	0.1%	304	0.1%
SOV	81,573	60.2%	77,139	62.7%	85,356	41.1%	81,375	43.3%	105,699	42.3%	100,592	45.1%	106,108	43.0%	100,945	45.3%
HOV 2 persons	21,986	16.2%	20,936	17.0%	25,660	12.4%	24,300	12.9%	32,186	13.1%	30,527	13.7%	31,681	12.9%	30,064	13.5%
HOV 3+ persons	11,763	8.7%	11,335	9.2%	14,405	6.9%	13,846	7.4%	18,316	7.4%	17,635	7.9%	18,210	7.9%	17,512	7.9%
Transit Walk Access	2,708	2.0%	2,535	2.1%	51,242	24.7%	50,808	27.1%	55,350	22.5%	54,833	24.0%	56,172	22.4%	54,631	24.5%
Transit Auto Access	6,519	7.0%	9,519	7.7%	14,952	7.2%	14,952	8.0%	16,036	6.5%	16,036	7.2%	16,210	6.8%	16,210	7.3%
School Bus	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	138,447	100%	123,046	100%	207,613	100%	187,702	100%	246,402	100%	222,900	100%	246,543	100%	222,890	100%
Drive Alone	81,573	60%	77,139	63%	85,356	41%	81,325	43%	105,699	43%	100,592	45%	106,108	43%	100,945	45%
Non-Drive Alone	53,874	40%	45,907	37%	122,257	59%	106,377	57%	140,704	57%	122,308	55%	140,435	57%	121,945	55%

City of Bellevue Residents (Tour originates or terminates in the City of Bellevue at a residence)

Mode	2019				No Action				Alt 1				Alt 2			
	All Purposes		Work Purpose		All Purposes		Work Purpose		All Purposes		Work Purpose		All Purposes		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	31,530	13.5%	1,434	2.0%	65,828	18.4%	2,097	2.5%	81,077	19.5%	2,804	2.9%	90,943	19.4%	3,046	2.8%
Bike	1,619	0.7%	122	0.2%	3,866	1.1%	195	0.2%	4,604	1.1%	216	0.2%	5,240	1.1%	235	0.2%
SOV	76,763	22.8%	45,402	62.3%	87,978	24.7%	42,392	52.3%	100,442	24.2%	50,249	52.5%	115,267	24.5%	56,924	52.5%
HOV2	58,352	24.9%	12,586	17.3%	84,877	23.8%	12,966	15.6%	97,352	23.5%	15,539	15.9%	109,526	23.4%	17,139	15.5%
HOV3+	49,016	20.9%	6,673	9.2%	71,577	20.1%	6,902	8.3%	81,047	19.5%	8,135	8.3%	90,589	19.3%	9,131	8.3%
Transit Walk Access	4,664	2.0%	2,166	3.0%	24,355	6.8%	11,559	13.9%	29,803	7.2%	14,212	14.6%	34,238	7.3%	16,653	15.1%
Transit Auto Access	4,465	3.9%	4,465	6.1%	5,741	1.6%	5,827	7.0%	6,381	1.5%	6,476	6.6%	7,250	1.5%	7,355	6.7%
School Bus	7,959	3.4%	0	0.0%	12,614	3.5%	0	0.0%	14,376	3.5%	0	0.0%	16,195	3.4%	0	0.0%
Total	234,368	100%	72,848	100%	356,837	100%	82,938	100%	415,080	100%	97,650	100%	469,649	100%	110,483	100%
Drive Alone	76,763	33%	45,402	62%	87,978	25%	43,392	52%	100,442	24%	50,249	51%	115,267	25%	56,924	52%
Non-Drive Alone	157,605	67%	27,446	38%	268,859	75%	39,546	48%	314,638	76%	47,401	49%	354,382	75%	53,559	48%

Mode	Alt 3				Alt 3 A				Preferred				Preferred A			
	All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	20,302	7.6%	3,713	1.5%	20,467	7.7%	3,765	1.6%	19,836	7.6%	4,137	1.8%	19,834	7.6%	4,049	1.7%
Bike	363	0.1%	315	0.1%	372	0.1%	319	0.1%	423	0.2%	363	0.2%	423	0.2%	378	0.2%
SOV	115,132	43.4%	109,323	45.6%	115,490	43.3%	109,616	45.9%	118,492	45.5%	112,287	47.7%	118,494	45.5%	113,096	47.8%
HOV 2 persons	34,682	13.1%	32,864	13.7%	34,871	13.1%	33,095	13.7%	35,402	13.6%	33,596	14.3%	35,402	13.4%	33,619	14.2%
HOV 3+ persons	19,414	7.3%	18,679	7.8%	19,493	7.3%	18,772	7.8%	19,558	7.5%	18,786	8.0%	19,558	7.5%	18,726	7.9%
Transit Walk Access	58,474	22.0%	57,946	24.1%	58,644	22.0%	58,126	24.1%	59,488	19.4%	49,816	21.2%	50,437	21.3%	50,437	21.3%
Transit Auto Access	17,113	6.4%	17,113	7.1%	17,156	6.5%	17,196	7.1%	16,418	6.3%	16,418	7.0%	16,418	6.3%	16,400	6.9%
School Bus	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	265,501	100%	239,953	100%	266,534	100%	240,909	100%	260,616	100%	235,523	100%	260,616	100%	236,705	100%
Drive Alone	115,132	43%	109,323	46%	115,490	43%	109,636	46%	118,492	45%	112,287	48%	118,494	45%	113,096	48%
Non-Drive Alone	150,348	57%	130,630	54%	151,044	57%	131,273	54%	142,125	55%	123,236	52%	142,123	55%	123,609	52%

City of Bellevue Residents (Tour originates or terminates in the City of Bellevue at a residence)

Mode	Alt 3				Alt 3 A				Preferred				Preferred A			
	All Purposes		Work Purpose		All Purposes		Work Purpose		All Purposes		Work Purpose		All Purposes		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	10,964	19.4%	3,513	2.8%	10,250	19.5%	3,534	2.8%	118,969	18.0%	4,020	2.6%	118,892	18.0%	3,931	2.5%
Bike	5,705	1.1%	271	0.2%	5,798	1.1%	273	0.2%	6,507	1.0%	354	0.2%	6,586	1.0%	371	0.2%
SOV	129,639	24.7%	63,990	51.5%	129,376	24.6%	63,910	51.4%	171,947	26.0%	83,772	51.4%	171,930	26.0%	83,778	51.4%
HOV2	122,638	23.4%	19,303	15.5%	122,663	23.4%	19,226	15.5%	159,130	24.1%	24,776	15.8%	159,093	24.3%	24,739	15.8%
HOV3+	99,689	19.0%	10,063	8.1%	99,676	19.0%	10,054	8.1%	127,174	19.2%	12,589	8.0%	127,114	19.2%	12,677	8.1%
Transit Walk Access	29,464	7.5%	19,150	15.4%	29,464	7.5%	19,163	15.4%	45,008	6.8%	21,004	13.5%	44,917	6.8%	21,264	13.6%
Transit Auto Access	7,897	1.5%	8,025	6.5%	8,027	1.5%	8,144	6.6%	9,975	1.5%	10,124	6.5%	9,985	1.5%	10,128	6.5%
School Bus	18,005	3.4%	0	0.0%	17,950	3.4%	0	0.0%	21,983	3.3%	0	0.0%	22,017	3.3%	0	0.0%
Total	534,941	100%	124,315	100%	525,204	100%	124,304	100%	660,692	100%	156,839	100%	660,595	100%	156,888	100%
Drive Alone	129,639	25%	63,990	51%	129,376	25%	63,910	51%	171,947	26%	83,772	53%	171,930	26%	83,778	53%
Non-Drive Alone	395,302	75%	60,325	49%	395,828	75%	60,394	49%	488,745	74%	73,067	47%	488,665	74%	73,110	47%

Bellevue Comprehensive Plan EIS Appendix - Corridor Travel Speed

Existing

Corridor	From	To	PMA	Target Ratio	Speed Limit (mph)	Typical Urban Travel Speed (mph)	Iiteris Peak 15min speed from Iiteris 3rd week of Sep 2019					
							Observed Speed (mph)		Ratio to Target Speed		Existing Ratio to the TUTS	
							NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Bellevue Way	SR 520	NE 12th St	3	>0.9	35.00	14.00	19.60	24.40	1.40	1.74	Meet the Target	Meet the Target
Bellevue Way	NE 12th St	Main St	1a	>0.5	30.00	12.00	13.20	4.80	1.10	0.49	Do Not Meet the Target	Do Not Meet the Target
Bellevue Way	Main St	112th Ave SE	3	>0.9	30.00	12.00	26.90	10.80	2.24	0.90	Meet the Target	Do Not Meet the Target
Bellevue Way	112th Ave SE	I-90	3	>0.9	40.00	16.00	24.50	17.90	1.53	1.12	Meet the Target	Meet the Target
108th Ave NE	NE 12th St	Main St	1a	>0.5	30.00	12.00	10.60	13.70	0.88	1.14	Meet the Target	Meet the Target
112th Ave NE	Northrup Way	NE 12th St	3	>0.9	30.00	12.00	25.10	20.00	2.09	1.67	Meet the Target	Meet the Target
112th Ave NE	NE 12th St	Main St	1a	>0.5	30.00	12.00	12.70	9.20	1.06	0.77	Meet the Target	Meet the Target
112th Ave SE	Main St	SE 8th St	1c	>0.5	35.00	14.00	31.19	6.50	2.23	0.46	Meet the Target	Do Not Meet the Target
112th Ave SE	SE 8th St	Bellevue Way	3	>0.9	35.00	14.00	31.19	6.50	2.23	0.46	Meet the Target	Do Not Meet the Target
116th Ave NE	Northrup Way	NE 12th St	1b	>0.5	30.00	12.00	21.80	17.70	1.82	1.48	Meet the Target	Meet the Target
116th Ave NE	NE 12th St	Main St	1c	>0.5	30.00	12.00	15.60	8.40	1.30	0.70	Meet the Target	Meet the Target
116th Ave NE/Lake Hills Connector	Main St	SE 8th St	1c	>0.5	35.00	14.00	22.20	21.40	1.59	1.53	Meet the Target	Meet the Target
116th Ave NE/Lake Hills Connector	SE 8th St	Richards Road	3	>0.9	35.00	14.00	25.80	14.10	1.84	1.01	Meet the Target	Meet the Target
124th Ave NE	SR 520	NE 10th Pl	1b	>0.5	30.00	12.00	15.08	16.40	1.26	1.37	Meet the Target	Meet the Target
124th Ave NE	NE 10th Pl	NE 8th St	3	>0.9	30.00	12.00	15.08	16.40	1.26	1.37	Meet the Target	Meet the Target
124th Ave NE/SE 38th St	Factoria Blvd	Coal Creek Pkwy	2c	>0.75	35.00	14.00	17.25	18.47	1.23	1.32	Meet the Target	Meet the Target
Richards Road	Lake Hills Connector	SE 26th St	3	>0.9	35.00	14.00	21.00	11.60	1.50	0.83	Meet the Target	Do Not Meet the Target
Richards Road	SE 26th St	I-90	2b	>0.75	35.00	14.00	21.00	11.60	1.50	0.83	Meet the Target	Meet the Target
Factoria Blvd	I-90	Coal Creek Pkwy	2c	>0.75	35.00	14.00	13.70	14.30	0.88	1.02	Meet the Target	Meet the Target
Coal Creek Pkwy	I-405	SE 48th Ct	2c	>0.75	35.00	14.00	23.80	22.65	1.70	1.62	Meet the Target	Meet the Target
Coal Creek Pkwy	SE 48th Ct	Forest Drive SE	3	>0.9	35.00	14.00	23.80	22.65	1.70	1.62	Meet the Target	Meet the Target
Coal Creek Pkwy	Forest Drive SE	Newcastle	3	>0.9	40.00	16.00	35.00	20.40	2.19	1.28	Meet the Target	Meet the Target
Lake Washington Blvd	I-405	Renton	3	>0.9	25.00	10.00	24.50	26.50	2.45	2.65	Meet the Target	Meet the Target
140th Ave NE	Bellevue Northern City Limit	NE 24th St	3	>0.9	35.00	14.00	16.20	25.30	1.16	1.81	Meet the Target	Meet the Target
140th Ave NE	NE 24th St	SR 520	3	>0.9	30.00	12.00	15.00	9.80	1.25	0.82	Meet the Target	Do Not Meet the Target
140th Ave NE	SR 520	Bel-Red Rd	1b	>0.5	30.00	12.00	15.00	9.80	1.25	0.82	Meet the Target	Meet the Target
140th Ave NE	Bel-Red Rd	NE 14th St	1b	>0.5	30.00	12.00	20.60	5.20	1.72	0.43	Meet the Target	Do Not Meet the Target
140th Ave NE	NE 14th St	NE 8th St	3	>0.9	30.00	12.00	20.60	5.20	1.72	0.43	Meet the Target	Do Not Meet the Target
140th Ave NE	NE 8th St	SE 8th St	3	>0.9	30.00	12.00	19.10	11.90	1.59	0.99	Meet the Target	Meet the Target
140th Ave NE/145th Pl SE	SE 8th St	SE 24th St	3	>0.9	30.00	12.00	21.30	14.40	1.78	1.20	Meet the Target	Meet the Target
148th Ave NE	Bellevue Northern City Limit	SR 520	3	>0.9	35.00	14.00	16.90	18.20	1.21	1.30	Meet the Target	Meet the Target
148th Ave NE	SR 520	NE 15th Ct	1b	>0.5	35.00	14.00	21.40	12.20	1.53	0.87	Meet the Target	Meet the Target
148th Ave NE	NE 15th Ct	NE 8th St	3	>0.9	35.00	14.00	21.40	12.20	1.53	0.87	Meet the Target	Do Not Meet the Target
148th Ave NE	NE 8th St	SE 8th St	3	>0.9	35.00	14.00	24.50	14.80	1.75	1.06	Meet the Target	Meet the Target
148th Ave SE	SE 8th St	SE 24th St	3	>0.9	35.00	14.00	19.40	8.60	1.39	0.61	Meet the Target	Do Not Meet the Target
148th Ave SE	SE 24th St	SE 37th St	2b	>0.75	35.00	14.00	23.60	6.30	1.69	0.45	Meet the Target	Do Not Meet the Target
148th Ave SE	SE 37th St	SE 38th St	2b	>0.75	30.00	12.00	20.10	14.40	1.68	1.20	Meet the Target	Meet the Target
150th Ave SE	SE 38th St	Newport Way	3	>0.9	30.00	12.00	20.10	14.40	1.68	1.20	Meet the Target	Meet the Target
150th Ave NE	Bel-Red Rd	NE 20th St	1b	>0.5	30.00	12.00	21.70	17.90	1.81	1.49	Meet the Target	Meet the Target
150th Ave NE	NE 20th St	NE 8th St	2a	>0.75	30.00	12.00	21.70	17.90	1.81	1.49	Meet the Target	Meet the Target
150th Ave NE	NE 8th St	Lake Hills Blvd	3	>0.9	25.00	10.00	25.00	14.80	2.50	1.48	Meet the Target	Meet the Target
150th Ave SE	Lake Hills Blvd	SE 27th St	3	>0.9	30.00	12.00	23.90	15.70	1.99	1.31	Meet the Target	Meet the Target
150th Ave SE	SE 27th St	Eastgate Way	2b	>0.75	30.00	12.00	23.90	15.70	1.99	1.31	Meet the Target	Meet the Target
West Lake Sammamish Pkwy	NE 24th St	Northrup Way	3	>0.9	25.00	10.00	35.10	35.70	3.61	3.67	Meet the Target	Meet the Target
West Lake Sammamish Pkwy	Northrup Way	SE 34th St	3	>0.9	25.00	10.00	33.40	17.20	3.34	1.72	Meet the Target	Meet the Target
West Lake Sammamish Pkwy	SE 34th St	I-90 (SE Newport Way)	3	>0.9	25.00	10.00	30.65	11.40	3.07	1.14	Meet the Target	Meet the Target
Lakemont Blvd	I-90	164th Ave SE	3	>0.9	40.00	16.00	31.00	21.80	1.94	1.36	Meet the Target	Meet the Target
Lakemont Blvd	164th Ave SE	Newcastle	3	>0.9	30.00	12.00	33.80	33.00	2.82	2.75	Meet the Target	Meet the Target
Northrup Way	Bellevue Way	SR 520	3	>0.9	35.00	14.00	13.60	20.70	0.97	1.48	Meet the Target	Meet the Target
Northrup Way	SR 520	124th Ave NE	1b	>0.5	35.00	14.00	13.60	20.70	0.97	1.48	Meet the Target	Meet the Target
NE 20th St	124th Ave NE	140th Ave NE	1b	>0.5	35.00	14.00	15.90	22.30	1.14	1.59	Meet the Target	Meet the Target
NE 20th St	140th Ave NE	156th Ave NE	1b	>0.5	35.00	14.00	15.20	19.40	1.09	1.39	Meet the Target	Meet the Target
Northrup Way	156th Ave NE	164th Ave NE	2a	>0.75	35.00	14.00	25.90	22.90	1.85	1.64	Meet the Target	Meet the Target
Northrup Way	164th Ave NE	West Lake Sammamish Pkwy	3	>0.9	35.00	14.00	25.90	22.90	1.85	1.64	Meet the Target	Meet the Target
NE 24th St	140th Ave NE	SR 520	3	>0.9	35.00	14.00	11.40	16.50	0.81	1.18	Do Not Meet the Target	Meet the Target
NE 24th St	SR 520	148th Ave NE	1b	>0.5	35.00	14.00	11.40	16.50	0.81	1.18	Meet the Target	Meet the Target
NE 24th St	Bel-Red Rd	156th Ave NE	1b	>0.5	30.00	12.00	17.90	21.20	1.49	1.77	Meet the Target	Meet the Target
NE 24th St	156th Ave NE	164th Ave NE	3	>0.9	30.00	12.00	17.90	21.20	1.49	1.77	Meet the Target	Meet the Target
NE Spring Boulevard	NE 12th St	NE 20th St	1b	>0.5	25.00	10.00						
NE 12th St	Bellevue Way	116th Ave NE	1a	>0.5	30.00	12.00	17.90	16.00	1.49	1.33	Meet the Target	Meet the Target
NE 12th St	116th Ave NE	124th Ave NE	1b	>0.5	30.00	12.00	22.00	21.60	1.83	1.80	Meet the Target	Meet the Target
Bel-Red Rd	124th Ave NE	148th Ave NE	1b	>0.5	35.00	14.00	20.10	26.20	1.44	1.87	Meet the Target	Meet the Target
Bel-Red Rd	148th Ave NE	156th Ave NE	1b	>0.5	35.00	14.00	17.60	14.60	1.26	1.04	Meet the Target	Meet the Target
Bel-Red Rd	156th Ave NE	164th Ave NE	3	>0.9	35.00	14.00	28.50	25.50	2.04	1.82	Meet the Target	Meet the Target
Bel-Red Rd	164th Ave NE	Redmond	3	>0.9	30.00	12.00	17.40	34.80	1.45	2.90	Meet the Target	Meet the Target
NE 10th St	Bellevue Way	116th Ave NE	1	>0.5	30.00	12.00	8.10	17.80	0.68	1.48	Meet the Target	Meet the Target
NE 8th St	Medina	100th Ave NE	3	>0.9	30.00	12.00	20.60	21.70	1.72	1.81	Meet the Target	Meet the Target
NE 8th St	100th Ave NE	I-405	1a	>0.5	30.00	12.00	10.40	10.20	0.87	0.85	Meet the Target	Meet the Target
NE 8th St	I-405	123rd Ave NE	1c	>0.5	30.00	12.00	19.00	15.80	1.58	1.32	Meet the Target	Meet the Target
NE 8th St	123rd Ave NE	124th Ave NE	3	>0.9	30.00	12.00	19.00	15.80	1.58	1.32	Meet the Target	Meet the Target
NE 8th St	124th Ave NE	148th Ave NE	3	>0.9	35.00	14.00	17.40	25.70	1.24	1.84	Meet the Target	Meet the Target
NE 8th St	148th Ave NE	153rd Ave NE	3	>0.9	35.00	14.00	20.65	22.45	1.48	1.60	Meet the Target	Meet the Target
NE 8th St	153rd Ave NE	164th Ave NE	2a	>0.75	35.00	14.00	20.65	22.45	1.48	1.60	Meet the Target	Meet the Target
NE 8th St	164 Ave NE	Northrup Way	3	>0.9	25.00	10.00	24.90	25.20	2.49	2.52	Meet the Target	Meet the Target
NE 4th St	Bellevue Way	116th Ave NE	1	>0.5	30.00	12.00	5.18	5.17	0.43	0.43	Do Not Meet the Target	Do Not Meet the Target
Main St	Bellevue Way	116th Ave NE	1	>0.5	30.00	12.00	16.50	14.80	1.38	1.23	Meet the Target	Meet the Target
SE 8th St	112th Ave SE	Lake Hills Connector	1c	>0.5	35.00	14.00	8.20	10.70	0.69	0.76	Meet the Target	Meet the Target
Lake Hills Connector/SE 8th St	Richards Road	148th Ave SE	3	>0.9	30.00	12.00	25.35	27.95	2.11	2.33	Meet the Target	Meet the Target
Lake Hills Blvd	148th Ave SE	156th Ave SE	3	>0.9	30.00	12.00	25.00	23.60	2.08	1.97	Meet the Target	Meet the Target
SE 26th St/Kamber Rd	Richards Road	140th Ave SE	2b	>0.75	35.00	14.00	24.30	18.20	1.74	1.30	Meet the Target	Meet the Target
Eastgate Way	Richards Road	139th Ave SE	2b	>0.75	35.00	14.00	24.40	9.70	1.74	0.69	Meet the Target	Do Not Meet the Target
Eastgate Way	139th Ave SE	150th Ave SE	2b	>0.75	35.00	14.00	20.00	23.00	1.43	1.64	Meet the Target	Meet the Target
Eastgate Way	150th Ave SE	161st Ave SE	2b	>0.75	30.00	12.00	18.00	14.70	1.50	1.23	Meet the Target	Meet the Target
SE 36th St	Factoria Blvd	142nd Ave SE	2	>0.75	35.00	14.00	20.30	13.70	1.45	0.98	Meet the Target	Meet the Target
SE 36th St	142nd Ave SE	150th Ave SE	2b	>0.75	35.00	14.00	18.70	22.00	1.34	1.57	Meet the Target	Meet the Target
Newport Way												

Bellevue Comprehensive Plan EIS Appendix - State Facilities

	Maximum Volume for LOS Standard	Existing		No Action		Alt 1		Alt 2		Alt 3		Alt 3A		Preferred Alt		Preferred A Alt	
		AADT	Ratio	AADT	Ratio	AADT	Ratio	AADT	Ratio	AADT	Ratio	AADT	Ratio	AADT	Ratio	AADT	Ratio
		I-405 north of SR 520	213,780	211,000	0.99	225,000	1.05	230,000	1.08	231,000	1.08	234,000	1.10	235,000	1.10	234,000	1.10
I-405 between SR 520 and I-90	192,410	205,000	1.07	238,000	1.23	240,000	1.25	242,000	1.26	245,000	1.27	245,000	1.27	253,000	1.32	254,000	1.32
I-405 south of I-90	129,780	150,000	1.16	180,000	1.39	184,000	1.42	184,000	1.42	187,000	1.44	187,000	1.44	190,000	1.46	190,000	1.46
SR 520 west of I-405	129,780	74,000	0.57	79,000	0.61	86,000	0.67	87,000	0.67	91,000	0.70	91,000	0.70	98,000	0.75	98,000	0.75
SR 520 east of I-405	126,690	105,000	0.83	120,000	0.95	127,000	1.00	130,000	1.02	133,000	1.05	134,000	1.06	139,000	1.10	140,000	1.10
I-90 west of I-405	172,410	148,000	0.86	145,000	0.84	146,000	0.85	148,000	0.86	151,000	0.87	150,000	0.87	157,000	0.91	158,000	0.91
I-90 east of I-405	213,095	152,000	0.71	154,000	0.72	157,000	0.74	160,000	0.75	161,000	0.76	162,000	0.76	176,000	0.83	176,000	0.83

Belleve Comprehensive Plan EIS Appendix - Transit Travel Time Ratio

Existing					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		1.65	1.81	2.82	1.78
Crossroads	2.14		2.13		2.11
Eastgate	2.63	2.54		1.50	2.58
Factoria	3.32		1.84		
Overlake	2.35	2.11	2.20		

No Action (Full Development on TFP Network)					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		0.98	1.05	0.96	0.90
Crossroads	1.81		1.80		1.66
Eastgate	1.15	2.13		0.63	2.27
Factoria	1.17		0.54		
Overlake	0.96	2.07	1.94		

Alt 1					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		0.99	0.94	0.84	0.87
Crossroads	1.76		1.76		1.65
Eastgate	1.14	2.13		0.62	2.26
Factoria	1.11		0.52		
Overlake	0.93	2.04	1.92		

Alt 2					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		0.99	0.89	0.81	0.85
Crossroads	1.75		1.73		1.64
Eastgate	1.09	2.08		0.62	2.22
Factoria	1.08		0.51		
Overlake	0.90	2.01	1.87		

Alt 3					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		1.00	0.87	0.78	0.83
Crossroads	1.72		1.70		1.62
Eastgate	1.07	2.05		0.61	2.18
Factoria	1.00		0.45		
Overlake	0.87	2.00	1.84		

Alt 3A					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		1.00	0.88	0.78	0.83
Crossroads	1.73		1.71		1.62
Eastgate	1.07	2.05		0.61	2.17
Factoria	1.00		0.45		
Overlake	0.88	1.99	1.84		

Preferred Alt					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		1.00	0.77	0.69	0.82
Crossroads	1.67		1.60		1.54
Eastgate	0.95	1.94		0.52	2.11
Factoria	0.86		0.34		
Overlake	0.83	1.86	1.74		

Preferred A Alt					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		1.00	0.78	0.68	0.82
Crossroads	1.67		1.60		1.55
Eastgate	0.94	1.93		0.52	2.10
Factoria	0.86		0.34		
Overlake	0.83	1.86	1.75		

Bellevue Comprehensive Plan EIS Appendix - VMT

	Modelled 2019		No Action* (Full Development on 2044 Network)		Alt 1 (Full Development on TFP Network)		Alt 2 (Full Development on TFP Network)	
	Jobs	Persons	Jobs	Persons	Jobs	Persons	Jobs	Persons
	VMT	Network Length	VMT	Network Length	VMT	Network Length	VMT	Network Length
Miles Driven During PM Peak Period	1,054,125	516.444	1,160,887	522.711	1210301.4	522.711	1,246,255	522.711
Citywide Daily VMT (miles)	4,099,375		5,111,588		5,345,913		5,490,867	
Daily VMT per Person	28.45		22.64		20.37		18.54	
Citywide Annual VMT (millions of miles)	1,340		1,671		1,748		1,795	

	Alt 3 (Full Development on TFP Network)		Alt 3A (Full Development on TFP Network)		Preferred (Full Development on TFP Network)		Preferred A (Full Development on TFP Network)	
	Jobs	Persons	Jobs	Persons	Jobs	Persons	Jobs	Persons
	VMT	Network Length	VMT	Network Length	VMT	Network Length	VMT	Network Length
Miles Driven During PM Peak Period	1,283,512	522.711	1,284,678	523.124	1,400,232	522.711	1,403,162	523.124
Citywide Daily VMT (miles)	5,679,515		5,689,397		6,234,168		6,238,337	
Daily VMT per Person	17.12		17.15		14.90		14.91	
Citywide Annual VMT (millions of miles)	1,857		1,860		2,038		2,040	

* The model includes system tolling and 30% WFH assumptions



APPENDIX K **Transportation Preferred Alternative**

APPENDIX K

Preferred Alternative with 2044 Growth Forecast

Appendix K summarizes the transportation (BKRCast) model results for the 2044 Growth Alternative) and compares the 2044 Growth Alternative with the No Action Alternative and the Preferred Alternative.

The 2044 Growth Alternative is a land use scenario that includes the 2044 land use forecast of approximately 33,000 new housing units and 70,000 new jobs that are proportionally distributed across the city according to the land use pattern in the Preferred Alternative “build-out” scenario. This 2044 land use forecast is an estimate of growth in Bellevue based on regional land use forecasts from the Puget Sound Regional Council and King County. The 2044 land use forecast anticipates considerably less new development than the “build out” scenarios for both the No Action and the Preferred Alternative that were modeled and are documented in the FEIS Chapter 11. The growth that is forecast in the 2044 Growth Alternative and the “build-out” scenario in the Preferred Alternative are compared to the No Action Alternative to define potential impacts. The transportation network in No Action, the Preferred Alternative and the 2044 Growth Alternative is identical. An extension of NE 6th Street as a 5-lane arterial between 116th Avenue NE and 120th Avenue NE is analyzed as an additional network alternative for the Preferred Alternative and the 2044 Growth Alternative.

TABLE 1 documents the jobs and housing units in the 2019 Baseline, “build-out” in the No Action and Preferred Alternatives and the land use forecast in the 2044 Growth Alternative. Complete tables for each alternative across all subareas are at the end of this appendix.

TABLE 1 Jobs and Housing Units

	2019	No Action Build-out	Preferred Alternative Build-out	Preferred Alternative with 2044 Growth Forecast
Housing Units	64,400	104,900	215,700	97,400
Jobs	137,700	262,500	322,700	207,800

SOURCE: City of Bellevue 2023

MODE SHARE

TABLE 2 summarizes the projected mode share for Bellevue workers and Bellevue residents for all trip purposes in No Action, Preferred Alternative, and the 2044 Growth Alternative.

TABLE 2 Mode Share

Mode	Bellevue Workers			Bellevue Residents		
	No Action	Preferred Alternative	2044 Growth Alternative	No Action	Preferred Alternative	2044 Growth Alternative
Walk	8%	8%	7%	18%	18%	19%
Bicycle	0%	0%	0%	1%	1%	1%
SOV	41%	46%	47%	25%	26%	25%
HOV	19%	21%	22%	44%	43%	44%
Transit	32%	26%	24%	12%	12%	11%

SOURCE: City of Bellevue 2023
 NOTE 1: Mode shares are rounded and may not sum to 100%.
 NOTE 2: Mode shares are for all trip purposes.
 NOTE 3: There are minor decimal point differences between mode shares for Preferred/Preferred A and 2044/2044 A. "A" is the extension of NE 6th Street between 116th Avenue NE and 120th Avenue NE.

VMT PER CAPITA

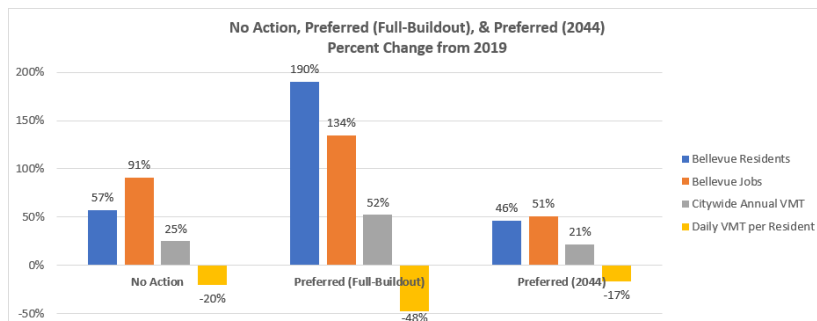
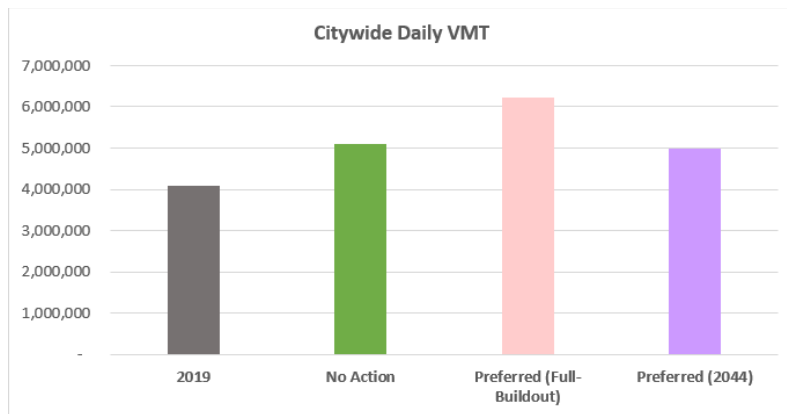
TABLE 3 presents the total Vehicle Miles Traveled (VMT) and VMT per capita under the No Action and the Preferred Alternative in the "build-out" scenario, and the 2044 Growth Alternative. The BKRCast model projects that total daily VMT would be nearly 5 million miles in the 2044 Growth Alternative, about the same as in No Action and 1.3 million miles less than the Preferred Alternative.

Daily VMT per capita is expected to be greater in the 2044 Growth Alternative than both No Action and the Preferred Alternative due to the slightly more dispersed nature of land use growth in residential areas that may necessitate Bellevue households taking more frequent and longer vehicle trips. While most growth in the 2044 Growth Alternative would be in High-Density Mixed-Use and Medium-Density Mixed-Use areas that are walkable and are well served by transit (consistent with Mobility Implementation Plan Performance Areas 1 and 2), additional growth is expected in areas of the city that are largely residential in nature (MIP Performance Management Area 3). However, the daily per capita VMT for the 2044 Growth Alternative is less than the 28.5 daily per capita VMT in 2019, showing progress toward the goal of reducing per capita VMT.

TABLE 3 VMT and VMT per Capita

	No Action Build-out	Preferred Alternative Build-out	2044 Growth Alternative Forecast
Daily VMT	5,112,000 miles	6,234,000 miles	4,976,000 miles
Daily VMT per Capita	22.6 miles	14.9 miles	23.6 miles

SOURCE: City of Bellevue 2023



TRANSIT TRAVEL TIME

Using the forecasted Primary Vehicle Corridor travel speed for vehicles as well as projected transit travel time, the transit travel time ratio for the 2044 Growth Alternative was calculated for each Activity Center pair. As shown in **TABLE 4** and **FIGURE 1**, there are three Activity Center pairs that are not expected to meet the MIP identified transit travel time ratio target of 2.0: Eastgate to Crossroads, Eastgate to Overlake, and Overlake to Crossroads. The transit travel time ratios that would not meet the performance target are **shown in bold**. For comparison to the 2044 Growth Alternative, **TABLE 5** and **TABLE 6** show transit travel time for the build-out scenarios of No Build and the Preferred Alternative.

TABLE 4 Transit Travel Time Ratio – 2044 Growth Alternative

Activity Center	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown	—	0.98	1.09	1.01	0.92
Crossroads	1.80	—	1.81	—	1.67
Eastgate	1.15	2.15	—	0.64	2.29
Factoria	1.15	—	0.53	—	—
Overlake	0.96	2.08	1.96	—	—

SOURCE: City of Bellevue 2023

TABLE 5 Transit Travel Time Ratio – No Action

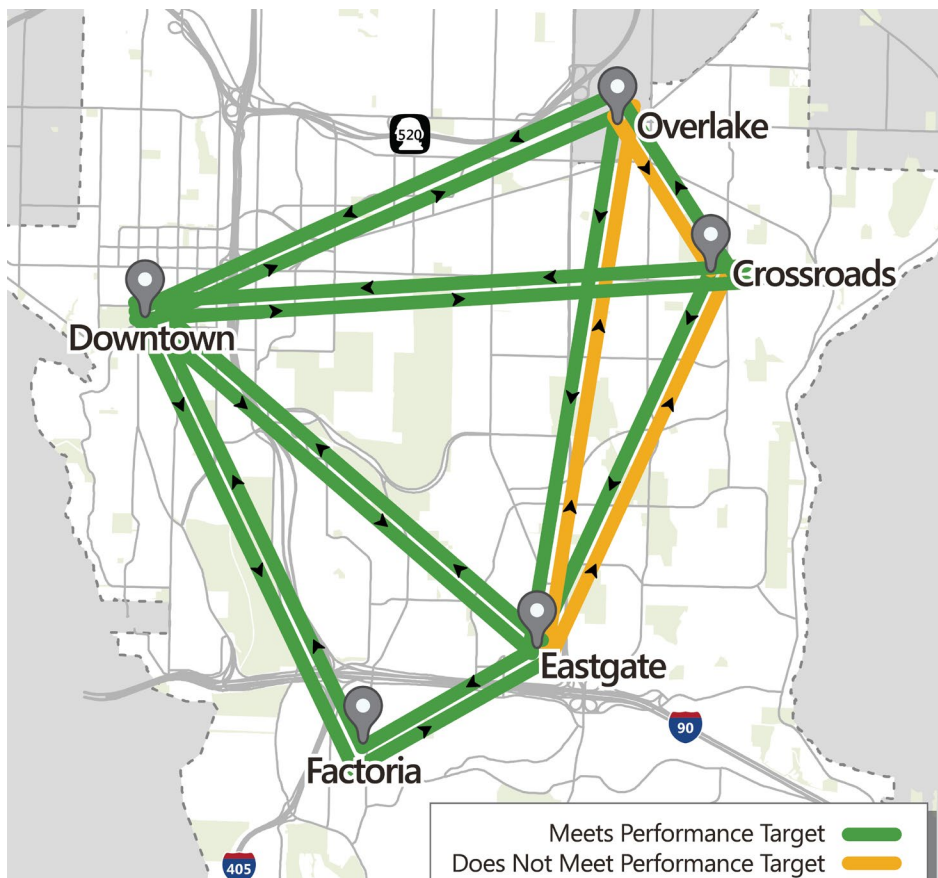
Activity Center	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown	—	0.98	1.05	0.96	0.90
Crossroads	1.81	—	1.80	—	1.66
Eastgate	1.15	2.13	—	0.63	2.27
Factoria	1.17	—	0.54	—	—
Overlake	0.96	2.07	1.94	—	—

SOURCE: City of Bellevue 2023

TABLE 6 Transit Travel Time Ratio - Preferred Alternative

Activity Center	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown	—	1.0	0.77	0.69	0.82
Crossroads	1.67	—	1.60	—	1.54
Eastgate	0.95	1.94	—	0.52	2.11
Factoria	0.86	—	0.34	—	—
Overlake	0.83	1.86	1.74	—	—

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 1 Transit Network Performance - 2044 Growth Alternative

SYSTEM INTERSECTION VOLUME-TO-CAPACITY (V/C) RATIO

A summary of intersection V/C modeling results for the 2044 Growth Alternative, No Action, and the Preferred Alternative is shown in **TABLE 7** and is mapped in **FIGURE 2**. **TABLE 8** includes all intersections that would **not** meet the performance target under the 2044 Growth Alternative, along with the V/C ratio expected for those same intersections under No Action and the Preferred Alternative for comparison.

A complete tabular summary is included at the end of this appendix. Under the 2044 Growth Alternative, the number of System Intersections citywide that would meet the target would be 118 of 134 System Intersections (88 percent). This is more than the 115 intersections (86%) that would meet the target in No Action and far more than the 63 intersections (47%) that would meet the target in Preferred Alternative.

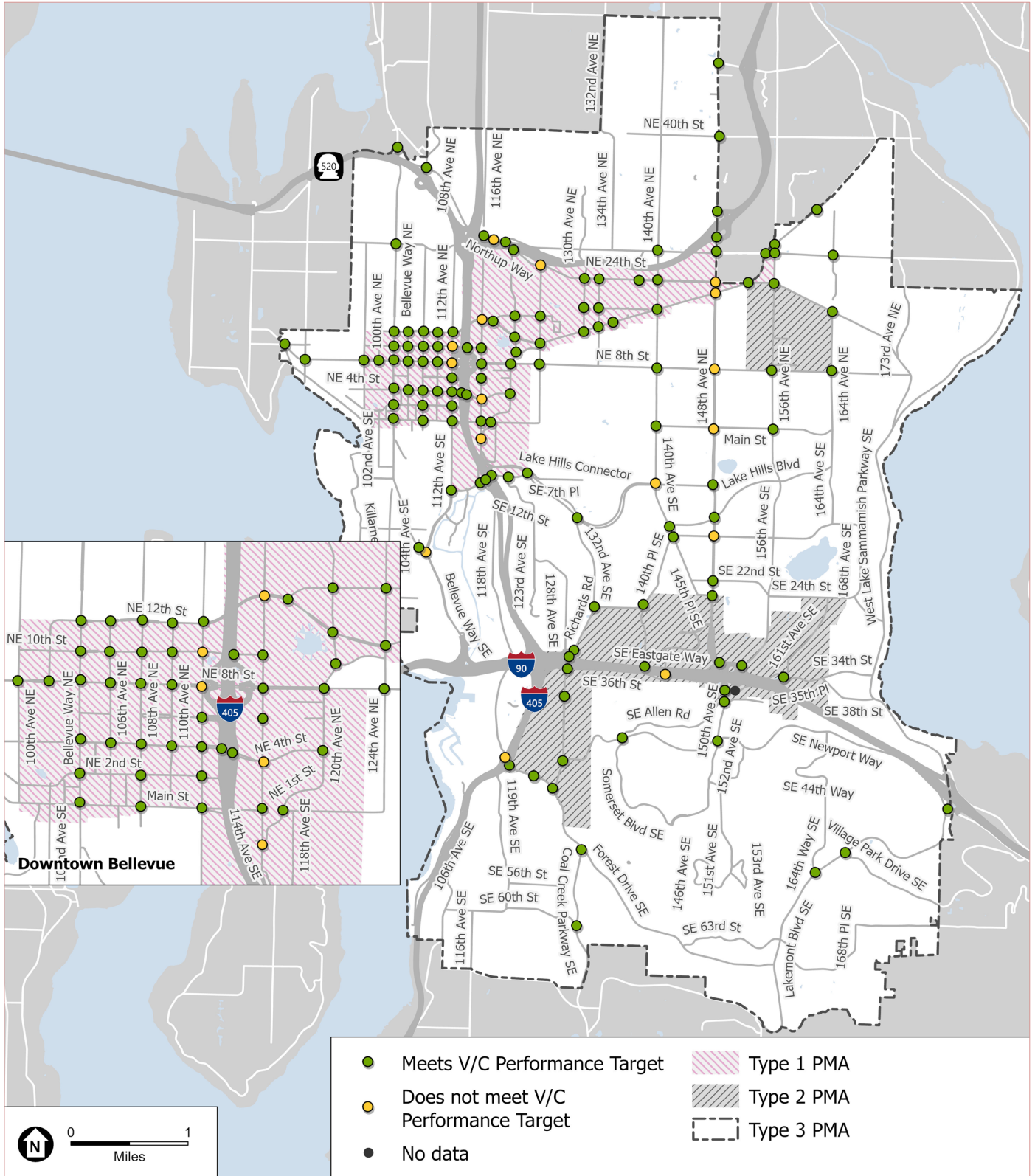
Specifically, documented by Performance Management Area, the number of System Intersections that would meet the target would decrease to 67 of 75 (89 percent) in Type 1 PMAs, and 21 of 23 (91 percent) in the Type 2 PMA, and 30 of 36 (83 percent) in the Type 3 PMA.

TABLE 7 Vehicle Network Performance – Summary

Performance Management Area	Performance Target	% of Intersections That Meet Target		
		No Action	Preferred Alternative	2044 Growth Alternative
Type 1 PMA (75 intersections)	1.00	88%	55%	89%
Type 2 PMA (24 intersections)	0.90	91%	30%	91%
Type 3 PMA (36 intersections)	0.85	78%	42%	83%
Total System Intersections (134)		86%	47%	88%

**TABLE 8 Vehicle Network Performance -
System Intersections**

Performance Management Area and Performance Target	Intersections That Would Not Meet Target under 2044 Growth Alternative	V/C Ratio		
		No Action	Preferred Alternative	2044 Growth Alternative
Type 1 PMA (Performance Target = 1.00)	112th Ave NE & NE 8th St	1.23	1.56	1.04
	112th Ave NE & NE 10th St	1.12	1.48	1.06
	116th Ave NE & NE 12th St	1.32	2.24	1.33
	148th Ave NE & NE 20th St	1.00	1.18	1.02
	148th Ave NE & Bel-Red Rd	1.13	1.44	1.11
	124th Ave NE & Northup Wy	1.23	1.62	1.25
	116th Ave SE & SE 1st St	1.15	1.30	1.13
	116th Ave NE & NE 4th St	1.00	1.48	1.08
Type 2 PMA (Performance Target = 0.90)	142nd Ave SE & SE 36th St	0.92	1.33	0.96
	I-405 SB Ramps & Coal Creek Pkwy	1.13	1.31	1.11
Type 3 PMA (Performance Target = 0.85)	112th Ave SE & Bellevue Wy SE	1.00	1.11	0.93
	140th Ave NE & SE 8th St	0.87	1.16	0.88
	148th Ave NE & NE 8th St	0.96	1.33	0.94
	148th Ave & Main St	0.95	1.18	0.96
	148th Ave SE & SE 16th St	0.86	0.97	0.86
	115th Pl NE & Northup Wy	1.00	1.17	1.00



SOURCE: City of Bellevue 2023

FIGURE 2 System Intersection Performance - 2044 Growth Alternative

PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

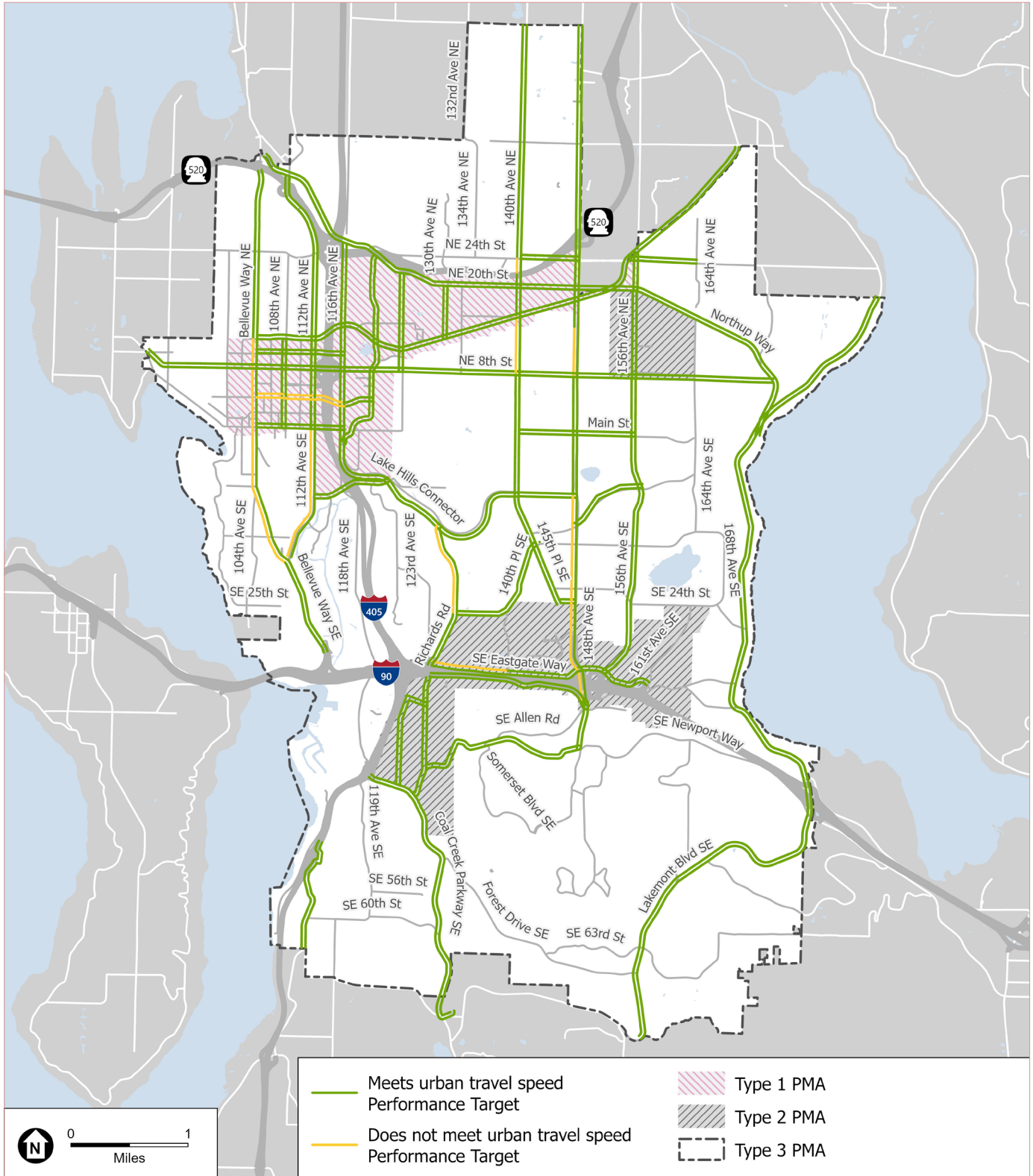
Primary Vehicle Corridor travel speed model results for the 2044 Growth Alternative are shown in **FIGURE 3. TABLE 9** lists the corridors that would not meet the performance target under the 2044 Growth Alternative along with the speed for those same corridors under both the No Action Alternative and Preferred Alternative for comparison. A full tabular summary is included at the end of this appendix.

13 corridors of a total of 95 Primary Vehicle Corridors would not meet the performance target under the 2044 Growth Alternative. This compares to 14 corridors in No Action and 27 corridors in the Preferred Alternative that would not meet the performance target.

Because traffic volume would generally be higher under the build-out scenarios in the No Action and the Preferred Alternatives, the ratio of travel speed-to-Typical Urban Travel Speed would be lower than in the 2044 Growth Alternative, therefore more Primary Vehicle Corridors would not meet the performance target in those build-out scenarios.

The following 13 Primary Vehicle Corridors would not meet the performance target under the 2044 Growth Alternative :

- Bellevue Way from NE 12th Street to Main Street
- Bellevue Way from Main Street to 112th Avenue SE
- 112th Avenue SE from Main Street to SE 8th Street
- 112th Avenue SE from SE 8th Street to Bellevue Way
- Richards Road from Lake Hills Connector to SE 26th Street
- 140th Avenue NE from NE 24th Street to SR 520
- 140th Avenue NE from Bel-Red Road to NE 14th Street
- 140th Avenue NE from NE 14th Street to NE 8th Street
- 148th Avenue NE from NE 15th Court to NE 8th Street
- 148th Avenue SE from SE 8th Street to SE 24th Street
- 148th Avenue SE from SE 24th Street to SE 37th Street
- NE 4th Street from Bellevue Way to 116th Avenue NE
- Eastgate Way from Richards Road to 139th Avenue SE



SOURCE: City of Bellevue 2023

FIGURE 3 Primary Vehicle Corridor Speed - 2044 Growth Alternative

TABLE 9 Vehicle Network Performance – Primary Vehicle Corridor Speed – 2044 Growth Alternative

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target in 2044 Growth Alternative	Speed (miles per hour)		
		2044 Growth Alternative	No Action	Preferred Alternative
Type 1 PMA Performance target: ≥0.5 Typical Urban Travel Speed	Bellevue Way – NE 12th St to Main St (SB/WB)	5	5	5
	112th Ave SE – Main St to SE 8th St (SB/WB)	6	6	6
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	5	5
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	5	5	5
Type 2 PMA Performance target: ≥0.75 Typical Urban Travel Speed	148th Ave – SE 24th St to SE 37th St (SB/WB)	7	7	7
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	10	10
Type 3 PMA Performance target: ≥0.9 Typical Urban Travel Speed	Bellevue Way – Main St to 112th Ave SE (SB/WB)	10	10	10
	112th Ave SE – SE 8th St to Bellevue Way (SB/WB)	6	6	6
	Richards Rd – Lk Hills Connector to SE 26th St (SB/WB)	12	11	12
	140th Avenue NE from NE 24th to SR 520 (SB/WB)	10	10	10
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	5	5
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	12	12
	148th Ave – SE 8th St to SE 24th St (SB/WB)	9	8	9
<p>SOURCE: City of Bellevue 2023</p> <p>EB = eastbound; NB = northbound; SB = southbound; WB = westbound.</p> <p>NOTE: Spring Boulevard between NE 12th Street and NE 20th Street is a Primary Vehicle Corridor, but data are currently insufficient to project future volumes as it has only recently opened.</p>				

STATE FACILITIES

TABLE 10 summarizes projected daily volume at each of the state facility study locations under the 2044 Growth Alternative. Compared to No Action and the Preferred Alternative, the 2044 Growth Alternative would result in lower volume and better level-of-service on state facilities.

TABLE 10 State Facility Performance

Location	2044 Growth Alternative		No Action		Preferred Alternative	
	AADT	Volume-to-LOS D Ratio	AADT	Volume-to-LOS D Ratio	AADT	Volume-to-LOS D Ratio
I-405 north of SR 520	223,000	1.04	225,000	1.05	231,000	1.08
I-405 between SR 520 and I-90	235,000	1.22	238,000	1.23	242,000	1.26
I-405 south of I-90	178,000	1.37	180,000	1.39	184,000	1.42
SR 520 west of I-405	75,000	0.58	79,000	0.61	87,000	0.67
SR 520 east of I-405	119,000	0.94	120,000	0.95	130,000	1.02
I-90 west of I-405	142,000	0.83	145,000	0.84	148,000	0.86
I-90 east of I-405	153,000	0.72	154,000	0.72	160,000	0.75
SOURCE: Fehr & Peers 2023						

WILBURTON STUDY AREA

Primary Vehicle Corridor travel speed and System Intersection V/C ratio model results within the Wilburton study area are shown in **FIGURE 4**. V/C ratio model results are summarized in **TABLE 11**.

2044 Growth Alternative A is the extension of NE 6th Street as a five-lane arterial between 116th Avenue NE and 120th Avenue NE. There is no significant quantitative difference in Primary Vehicle Corridor travel speed or System Intersection V/C with or without this extension.

All Primary Vehicle Corridors would meet the performance target for travel speed in 2044 Growth Alternative and 2044 Growth Alternative A, except for a segment of NE 4th Street between I-405 and 116th Avenue NE.

Three System Intersections in 2044 Growth Alternative and 2044 Growth Alternative A would have a V/C ratio that does not meet the 1.0 performance target, compared to two in No Action and 11 in the Preferred Alternative.

TABLE 11 Wilburton Study Area Vehicle Network Performance System Intersections

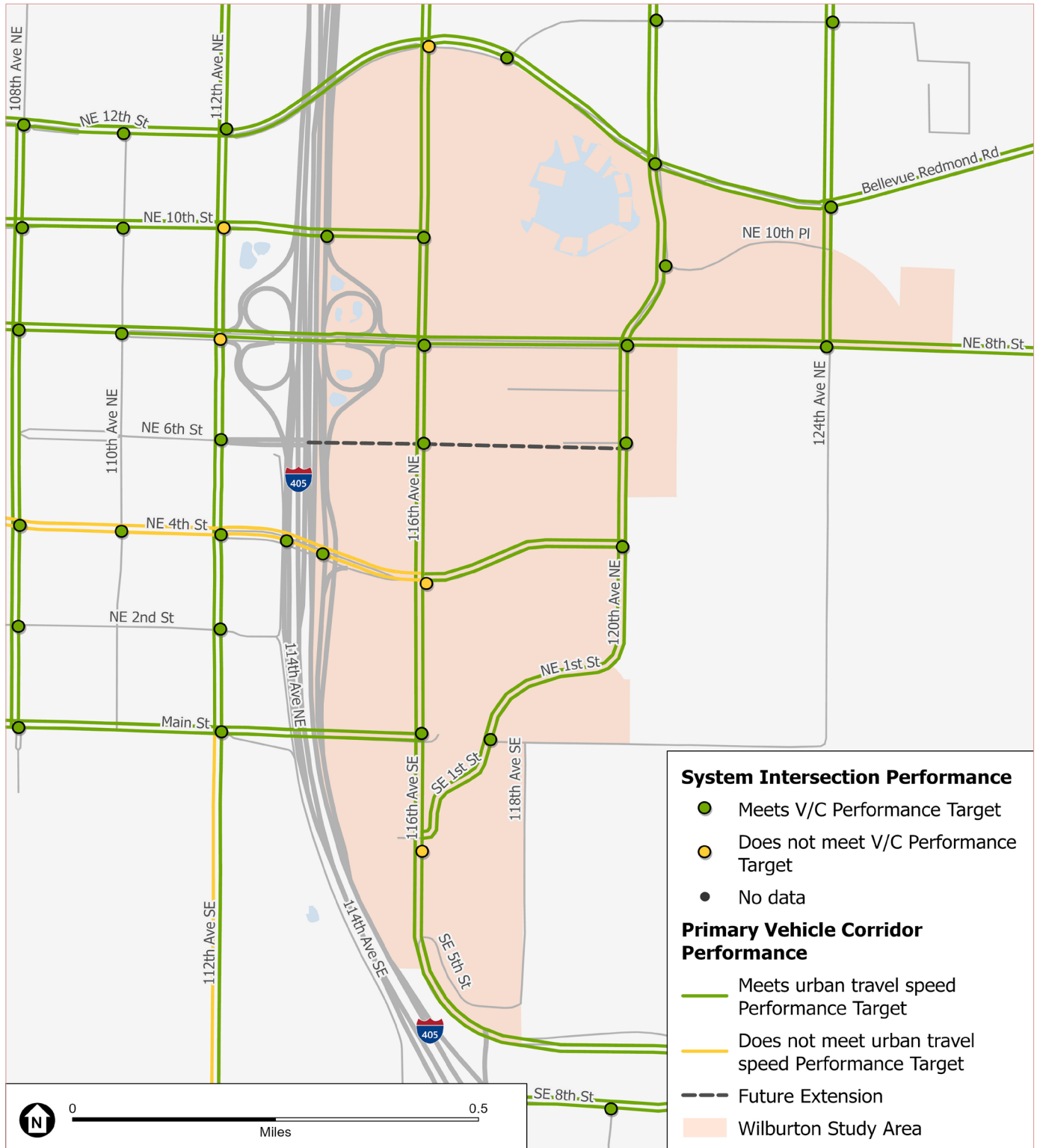
Intersection	V/C Ratio		
	No Action	Preferred Alternative	2044 Growth Alternative /2044A
I-405 SB Ramps & NE 4th St*	0.56	0.57	0.44 / 0.42
116th Ave NE & NE 12th St**	1.32	2.24	1.33 / 1.28
120th Ave NE & NE 12th St**	0.82	1.02	0.76 / 0.76
124th Ave NE & Bel-Red Rd**	0.95	1.34	0.95 / 0.92
Spring Blvd & NE 12th St**	0.54	0.81	0.51 / 0.51
120th Ave NE & Bel-Red Rd	0.41	0.46	0.40 / 0.41
116th Ave NE & NE 8th St	0.87	1.32	0.91 / 0.96
116th Ave NE/SE & Main St	0.78	1.03	0.75 / 0.76
116th Ave SE & SE 1st St	1.15	1.30	1.13 / 1.09
116th Ave NE & NE 4th St	1.00	1.48	1.08 / 1.07
120th Ave NE & NE 8th St	0.74	1.06	0.76 / 0.73
116th Ave NE & NE 10th St	0.70	0.94	0.71 / 0.71
NE/SE 1st St & Main St	0.64	1.05	0.73 / 0.60
120th Ave NE & NE 4th St	0.50	0.61	0.53 / 0.50
I-405 NB Ramps & NE 4th St	0.59	0.69	0.50 / 0.51
I-405 NB Ramps & NE 10th St	0.64	0.85	0.67 / 0.67
124th Ave NE & NE 8th St***	0.79	1.07	0.81 / 0.82
116th Ave NE & NE 6th St	0.74	1.26	0.81 / 0.88
120th Ave NE & NE 6th St	N/A	N/A / 1.09	N/A / 0.76

SOURCE: City of Bellevue 2023
Bold indicates the intersection does not meet the performance target
 *Intersection in the Downtown PMA 1
 **Intersection in the BelRed PMA 1
 *** Intersection in PMA 3
 NOTE: All System Intersections within the Wilburton study area, Downtown and BelRed in PMA 1 have a 1.0 performance target except for 124th Avenue NE/NE 8th Street, which is in PMA 3 and has a 0.85 performance target.



SOURCE: City of Bellevue 2023

FIGURE 4 Primary Vehicle Corridor System Intersection and Speed Performance - 2044 Growth Alternative in the Wilburton Study Area Vicinity



SOURCE: City of Bellevue 2023

FIGURE 5 Primary Vehicle Corridor System Intersection and Speed Performance – 2044 Growth Alternative in the Wilburton Study Area Vicinity with NE 6th Street Extension to 120th Avenue NE

Bellevue Comprehensive Plan EIS Appendix - Land Use Distribution

Housing Units by Subarea

Subarea	Name	2019	NA	Alt 1	Alt 2	Alt 3	Preferred	2044
		H.U.	H.U.	H.U.	H.U.	H.U.	H.U.	H.U.
1	North Bellevue	4,414	4,866	4,953	6,776	7,853	9,211	4,485
2	Bridle Trails	4,944	5,512	5,547	6,952	8,981	9,397	4,996
3	Downtown	9,963	28,638	31,013	31,013	31,398	29,329	24,403
4	Wilburton	712	678	7,857	11,250	11,419	10,726	3,759
5	Crossroads	4,148	4,699	5,552	6,478	6,494	9,688	4,421
6	Northeast Bellevue	3,495	3,744	3,758	4,838	5,231	13,811	3,448
7	South Bellevue	4,615	6,840	6,938	8,395	9,166	12,516	5,049
8	Richards Valley	6,034	6,820	8,279	10,844	9,908	14,787	7,115
9	East Bellevue	9,143	10,599	10,666	12,394	13,235	26,700	10,108
10	Eastgate	929	1,550	1,662	2,199	2,242	3,148	3,526
11	Southeast Bellevue	9,396	11,063	11,390	11,750	13,347	28,135	10,176
12	Bel-Red Northrup	1,836	13,777	18,773	19,486	29,643	29,461	10,356
13	Factoria	1,585	2,156	3,022	3,851	4,702	6,826	1,861
14	Newport Hills	3,158	3,963	4,079	4,482	5,271	12,014	3,671
Total		64,372	104,905	123,489	140,708	158,890	215,749	97,374

Jobs by Subarea

Subarea	Name	2019	NA	Alt 1	Alt 2	Alt 3	Preferred	2044
		Jobs	Jobs	Jobs	Jobs	Jobs	Jobs	Jobs
1	North Bellevue	4,941	5,042	5,025	5,027	5,026	5,151	5,587
2	Bridle Trails	3,768	3,788	3,788	3,836	3,866	3,891	3,962
3	Downtown	59,865	148,724	140,091	140,090	141,726	118,720	97,548
4	Wilburton	8,580	10,654	38,609	34,315	39,798	35,785	18,366
5	Crossroads	2,730	4,255	7,143	7,165	8,151	17,607	3,101
6	Northeast Bellevue	2,163	4,404	4,408	5,205	5,162	4,356	2,317
7	South Bellevue	5,143	12,970	12,970	12,931	12,949	16,377	6,410
8	Richards Valley	1,572	1,476	3,530	1,595	4,016	1,472	1,835
9	East Bellevue	4,357	5,223	5,124	5,206	5,248	4,977	5,685
10	Eastgate	18,672	20,362	20,744	20,518	20,718	21,807	21,107
11	Southeast Bellevue	1,310	1,279	1,279	1,274	1,274	1,534	1,544
12	Bel-Red Northrup	15,434	35,578	61,975	67,233	73,249	70,235	31,079
13	Factoria	8,627	8,035	11,249	9,856	16,302	20,078	8,702
14	Newport Hills	552	695	695	627	627	672	546
Total		137,714	262,485	316,630	314,878	338,112	322,662	207,789

Bellevue Comprehensive Plan EIS Appendix - Mode Share

City of Bellevue Workers (Tour includes a workplace within the City of Bellevue)

Mode	2044				2044 A			
	All Purposes (includes sub-tours)		Work Purpose		All Purposes (includes sub-tours)		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	11,351	7.0%	2,041	1.4%	11,264	7.0%	2,038	1.4%
Bike	259	0.2%	224	0.2%	253	0.2%	223	0.2%
SOV	76,367	47.0%	72,421	49.2%	75,425	46.9%	71,594	49.1%
HOV 2 persons	22,814	14.0%	21,575	14.7%	22,536	14.0%	21,357	14.7%
HOV 3+ persons	12,515	7.7%	12,028	8.2%	12,175	7.6%	11,723	8.0%
Transit Walk Access	29,454	18.1%	29,105	19.8%	29,494	18.3%	29,138	20.0%
Transit Auto Access	9,777	6.0%	9,777	6.6%	9,627	6.0%	9,629	6.6%
School Bus	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	162,537	100%	147,171	100%	160,774	100%	145,702	100%
Drive Alone	76,367	47%	72,421	49%	75,425	47%	71,594	49%
Non-Drive Alone	86,170	53%	74,750	51%	85,349	53%	74,108	51%

City of Bellevue Residents (Tour originates or terminates in the City of Bellevue at a residence)

Mode	2044				2044 A			
	All Purposes		Work Purpose		All Purposes		Work Purpose	
	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split	Tours	Mode Split
Walk	62,153	18.8%	1,946	2.5%	63,615	18.9%	1,964	2.6%
Bike	3,772	1.1%	183	0.2%	3,958	1.2%	186	0.2%
SOV	82,568	24.9%	41,155	53.4%	83,695	24.8%	40,965	53.2%
HOV2	79,360	24.0%	12,744	16.5%	81,386	24.1%	12,789	16.6%
HOV3+	67,099	20.3%	6,524	8.5%	68,087	20.2%	6,400	8.3%
Transit Walk Access	19,879	6.0%	9,772	12.7%	20,141	6.0%	9,944	12.9%
Transit Auto Access	4,637	1.4%	4,703	6.1%	4,656	1.4%	4,691	6.1%
School Bus	11,713	3.5%	0	0.0%	11,690	3.5%	0	0.0%
Total	331,182	100%	77,027	100%	337,227	100%	76,939	100%
Drive Alone	82,568	25%	41,155	53%	83,695	25%	40,965	53%
Non-Drive Alone	248,614	75%	35,872	47%	253,533	75%	35,974	47%

Bellevue Comprehensive Plan EIS Appendix - State Facilities

	Maximum Volume for LOS Standard	2044		2044 A	
		AADT	Ratio	AADT	Ratio
I-405 north of SR 520	213,780	223,000	1.04	226,000	1.06
I-405 between SR 520 and I-90	192,410	235,000	1.22	237,000	1.23
I-405 south of I-90	129,780	178,000	1.37	179,000	1.38
SR 520 west of I-405	129,780	75,000	0.58	77,000	0.60
SR 520 east of I-405	126,690	119,000	0.94	121,000	0.95
I-90 west of I-405	172,410	142,000	0.83	143,000	0.83
I-90 east of I-405	213,095	153,000	0.72	156,000	0.73

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

2044

2044 A

Downtown

NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
100th Ave NE	NE 8th St	1a	0.81	Meet Target	0.83	Meet Target
Bellevue Wy NE	NE 12th St	1a	0.83	Meet Target	0.84	Meet Target
Bellevue Wy NE	NE 8th St	1a	0.64	Meet Target	0.66	Meet Target
Bellevue Wy NE	NE 4th St	1a	0.53	Meet Target	0.53	Meet Target
Bellevue Wy	Main St	1a	0.9	Meet Target	0.9	Meet Target
108th Ave NE	NE 12th St	1a	0.66	Meet Target	0.66	Meet Target
108th Ave NE	NE 8th St	1a	0.74	Meet Target	0.73	Meet Target
108th Ave NE	NE 4th St	1a	0.88	Meet Target	0.89	Meet Target
108th Ave	Main St	1a	0.36	Meet Target	0.35	Meet Target
112th Ave NE	NE 12th St	1a	0.95	Meet Target	0.94	Meet Target
112th Ave NE	NE 8th St	1a	1.04	Do Not Meet Target	1.04	Do Not Meet Target
112th Ave	Main St	1a	0.9	Meet Target	0.89	Meet Target
112th Ave NE	NE 4th St	1a	0.67	Meet Target	0.7	Meet Target
Bellevue Way NE	NE 10th St	1a	0.56	Meet Target	0.58	Meet Target
110th Ave NE	NE 8th St	1a	0.73	Meet Target	0.73	Meet Target
108th Ave NE	NE 2nd St	1a	0.46	Meet Target	0.45	Meet Target
106th Ave NE	NE 8th St	1a	0.71	Meet Target	0.69	Meet Target
110th Ave NE	NE 12th St	1a	0.58	Meet Target	0.58	Meet Target
106th Ave NE	NE 12th St	1a	0.53	Meet Target	0.53	Meet Target
106th Ave NE	NE 4th St	1a	0.52	Meet Target	0.52	Meet Target
112th Ave NE	NE 2nd St	1a	0.6	Meet Target	0.59	Meet Target
110th Ave NE	NE 10th St	1a	0.54	Meet Target	0.54	Meet Target
108th Ave NE	NE 10th St	1a	0.5	Meet Target	0.49	Meet Target
106th Ave NE	NE 10th St	1a	0.42	Meet Target	0.42	Meet Target
112th Ave NE	NE 6th St	1a	0.77	Meet Target	0.76	Meet Target
112th Ave NE	NE 10th St	1a	1.06	Do Not Meet Target	1.04	Do Not Meet Target
110th Ave NE	NE 4th St	1a	0.55	Meet Target	0.58	Meet Target
Bellevue Way NE	NE 2nd St	1a	0.47	Meet Target	0.49	Meet Target
102nd Ave NE	NE 8th St	1a	0.45	Meet Target	0.45	Meet Target
I-405 SB Ramps	NE 4th St	1a	0.44	Meet Target	0.42	Meet Target
Intersections not meeting the target			2		2	
<i>Area Target</i>			1.00		1.00	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

2044

2044 A

BelRed

NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
116th Ave NE	NE 12th St	1b	1.33	Do Not Meet Target	1.28	Do Not Meet Target
120th Ave NE	NE 12th St	1b	0.76	Meet Target	0.76	Meet Target
124th Ave NE	Bel-Red Rd	1b	0.95	Meet Target	0.92	Meet Target
130th Ave NE	Bel-Red Rd	1b	0.7	Meet Target	0.69	Meet Target
140th Ave NE	NE 20th St	1b	0.73	Meet Target	0.75	Meet Target
140th Ave NE	Bel-Red Rd	1b	0.82	Meet Target	0.82	Meet Target
148th Ave NE	NE 20th St	1b	1.02	Do Not Meet Target	1.02	Do Not Meet Target
148th Ave NE	Bel-Red Rd	1b	1.11	Do Not Meet Target	1.13	Do Not Meet Target
Bel-Red Rd	NE 24th St	1b	0.56	Meet Target	0.57	Meet Target
156th Ave NE	Bel-Red Rd	1b	0.62	Meet Target	0.63	Meet Target
156th Ave NE	NE 24th St	1b	0.84	Meet Target	0.86	Meet Target
130th Ave NE	Northup Wy	1b	0.73	Meet Target	0.74	Meet Target
148th Ave NE	NE 24th St	1b	0.96	Meet Target	0.97	Meet Target
124th Ave NE	Northup Wy	1b	1.25	Do Not Meet Target	1.25	Do Not Meet Target
120th Ave NE	Northup Wy	1b	0.37	Meet Target	0.36	Meet Target
Spring Blvd	NE 12th St	1b	0.51	Meet Target	0.51	Meet Target
130th Ave NE	Spring Blvd	1b	0.37	Meet Target	0.39	Meet Target
132nd Ave NE	Spring Blvd	1b	0.4	Meet Target	0.42	Meet Target
132nd Ave NE	Bel-Red Rd	1b	0.84	Meet Target	0.83	Meet Target
134th Ave NE	Bel-Red Rd	1b	0.62	Meet Target	0.61	Meet Target
132nd Ave NE	NE 20th St	1b	0.53	Meet Target	0.54	Meet Target
124th Ave NE	Spring Blvd	1b	0.57	Meet Target	0.58	Meet Target
120th Ave NE	Spring Blvd	1b	0.32	Meet Target	0.32	Meet Target
136th Pl NE	Northup Way/NE 20th St	1b	0.61	Meet Target	0.62	Meet Target
148th Ave NE	SR 520 Ramps	1b	0.63	Meet Target	0.63	Meet Target
120th Ave NE	Bel-Red Rd	1b	0.4	Meet Target	0.41	Meet Target
Bel-Red Rd	NE 20th St	1b	0.6	Meet Target	0.62	Meet Target
156th Ave NE	Northup Wy	1b	0.81	Meet Target	0.82	Meet Target
Intersections not meeting the target			4		4	
<i>Area Target</i>			<i>1.00</i>		<i>1.00</i>	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

2044

2044 A

Wilburton/East Main

NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
116th Ave NE	NE 8th St	1c	0.91	Meet Target	0.96	Meet Target
116th Ave	Main St	1c	0.75	Meet Target	0.76	Meet Target
112th Ave SE	SE 8th St	1c	0.59	Meet Target	0.6	Meet Target
118th Ave SE	SE 8th St	1c	0.82	Meet Target	0.83	Meet Target
116th Ave SE	SE 1st St	1c	1.13	Do Not Meet Target	1.09	Do Not Meet Target
116th Ave NE	NE 4th St	1c	1.08	Do Not Meet Target	1.07	Do Not Meet Target
I-405 NB Off and On Ramp	SE 8th St	1c	0.71	Meet Target	0.71	Meet Target
I-405 SB Ramps	SE 8th St	1c	0.72	Meet Target	0.73	Meet Target
120th Ave NE	NE 8th St	1c	0.76	Meet Target	0.73	Meet Target
116th Ave NE	NE 10th St	1c	0.71	Meet Target	0.71	Meet Target
NE 1st St	Main St	1c	0.73	Meet Target	0.6	Meet Target
121st Ave SE	SE 8th St	1c	0.39	Meet Target	0.39	Meet Target
120th Ave NE	NE 4th St	1c	0.53	Meet Target	0.5	Meet Target
I-405 NB Ramps	NE 4th St	1c	0.5	Meet Target	0.51	Meet Target
I-405 NB Ramps	NE 10th St	1c	0.67	Meet Target	0.67	Meet Target
Lk Hills Connector	SE 7th Pl	1c	0.96	Meet Target	0.96	Meet Target
Intersections not meeting the target			2		2	
<i>Area Target</i>			<i>1.00</i>		<i>1.00</i>	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

2044

2044 A

Crossroads

NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
156th Ave NE	NE 8th St	2a	0.73	Meet Target	0.72	Meet Target
164th Ave NE	Northup Wy	2a	0.71	Meet Target	0.71	Meet Target
164th Ave NE	NE 8th St	2a	0.65	Meet Target	0.65	Meet Target
Intersections not meeting the target			0		0	
<i>Area Target</i>			<i>0.90</i>		<i>0.90</i>	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

		2044			2044 A	
Eastgate						
NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
156th Ave SE	SE Eastgate Wy	2b	0.58	Meet Target	0.59	Meet Target
161st Ave SE	SE Eastgate Wy	2b	0.51	Meet Target	0.51	Meet Target
150th Ave SE	SE Eastgate Wy	2b	0.81	Meet Target	0.82	Meet Target
142nd Ave SE	SE 36th St	2b	0.96	Do Not Meet Target	0.94	Do Not Meet Target
150th Ave SE	I-90 EB Off-Ramp/37th St	2b	0.51	Meet Target	0.51	Meet Target
139th Ave SE	SE Eastgate Wy	2b	0.48	Meet Target	0.48	Meet Target
I-90 EB On-ramp	SE 37th St	2b	Unsignalized, not analyzed		Unsignalized, not analyzed	
148th Ave SE	SE 24th St	2b	0.85	Meet Target	0.84	Meet Target
Richards Rd	SE 26th St (Kamber Rd)	2b	0.78	Meet Target	0.78	Meet Target
Richards Rd	SE 32nd St	2b	0.57	Meet Target	0.57	Meet Target
150th Ave SE	SE 38th St	2b	0.74	Meet Target	0.73	Meet Target
139th Ave SE	Kamber Rd	2b	0.65	Meet Target	0.65	Meet Target
Intersections not meeting the target			1		1	
<i>Area Target</i>			<i>0.90</i>		<i>0.90</i>	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

		2044			2044 A	
Factoria						
NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
Coal Creek Pkwy	Forest Dr	2c	0.82	Meet Target	0.82	Meet Target
Richards rd	SE Eastgate Wy	2c	0.71	Meet Target	0.68	Meet Target
Factoria Blvd SE	SE Newport Wy	2c	0.75	Meet Target	0.73	Meet Target
Factoria Blvd SE	Coal Creek Pkwy	2c	0.71	Meet Target	0.69	Meet Target
Factoria Blvd SE	SE 36th St (I-90 EB Off-ramp)	2c	0.85	Meet Target	0.82	Meet Target
I-405 NB Ramps	Coal Creek Pkwy	2c	0.74	Meet Target	0.74	Meet Target
I-405 SB Ramps	Coal Creek Pkwy	2c	1.11	Do Not Meet Target	1.1	Do Not Meet Target
Factoria Blvd SE	SE 38th St	2c	0.73	Meet Target	0.72	Meet Target
124th Ave SE	Coal Creek Pkwy	2c	0.76	Meet Target	0.74	Meet Target
Intersections not meeting the target			1		1	
<i>Area Target</i>			<i>0.90</i>		<i>0.90</i>	

Bellevue Comprehensive Plan EIS Appendix - System Intersection V/C

2044

2044 A

Residential

NS Street	EW Street	PMA	v/c	Performance	v/c	Performance
112th Ave SE	Bellevue Wy SE	3	0.93	Do Not Meet Target	0.93	Do Not Meet Target
124th Ave NE	NE 8th St	3	0.81	Meet Target	0.82	Meet Target
140th Ave NE	NE 8th St	3	0.78	Meet Target	0.77	Meet Target
140th Ave	Main St	3	0.61	Meet Target	0.61	Meet Target
140th Ave SE	SE 8th St	3	0.88	Do Not Meet Target	0.86	Do Not Meet Target
145th Pl SE	Lk Hills Blvd	3	0.58	Meet Target	0.58	Meet Target
145th Pl SE	SE 16th St	3	0.64	Meet Target	0.64	Meet Target
148th Ave NE	NE 8th St	3	0.94	Do Not Meet Target	0.94	Do Not Meet Target
148th Ave	Main St	3	0.96	Do Not Meet Target	0.94	Do Not Meet Target
148th Ave SE	Lk Hills Blvd	3	0.85	Meet Target	0.86	Do Not Meet Target
148th Ave SE	SE 16th St	3	0.86	Do Not Meet Target	0.85	Meet Target
140th Ave NE	NE 24th St	3	0.71	Meet Target	0.74	Meet Target
148th Ave SE	SE 8th St	3	0.77	Meet Target	0.76	Meet Target
Bellevue Wy NE	NE 24th St	3	0.68	Meet Target	0.68	Meet Target
Bellevue Wy NE	Northup Wy	3	0.66	Meet Target	0.66	Meet Target
164th Ave NE	NE 24th St	3	0.63	Meet Target	0.64	Meet Target
108th Ave NE	Northup Wy	3	0.68	Meet Target	0.67	Meet Target
148th Ave NE	NE 40th St	3	0.7	Meet Target	0.7	Meet Target
156th Ave	Main St	3	0.69	Meet Target	0.69	Meet Target
Lk Wash Blvd NE	NE10th & NE 1st St (5-Way)	3	0.66	Meet Target	0.65	Meet Target
SE Allen Rd/Somerset Blvd	SE Newport Wy	3	0.59	Meet Target	0.59	Meet Target
116th Ave NE	Northup Wy	3	0.83	Meet Target	0.82	Meet Target
115th Pl NE	Northup Wy	3	1	Do Not Meet Target	1.01	Do Not Meet Target
Northup Wy	NE 24th St	3	0.56	Meet Target	0.54	Meet Target
150th Ave SE	SE Newport Wy	3	0.66	Meet Target	0.66	Meet Target
Richards Rd	Lk Hills Con	3	0.67	Meet Target	0.66	Meet Target
148th Ave NE	NE 29th Pl	3	0.71	Meet Target	0.72	Meet Target
Lakemont Blvd SE	SE Newport Wy	3	0.66	Meet Target	0.67	Meet Target
164th Ave SE	Lakemont Blvd	3	0.67	Meet Target	0.67	Meet Target
Village Park Dr SE	Lakemont Blvd SE	3	0.56	Meet Target	0.56	Meet Target
148th Ave NE	NE 51st St	3	0.69	Meet Target	0.68	Meet Target
92nd Ave NE	NE 8th St	3	0.37	Meet Target	0.37	Meet Target
148th Ave SE	SE 22nd St	3	0.85	Meet Target	0.85	Meet Target
Bel-Red Rd	NE 30th St	3	0.57	Meet Target	0.57	Meet Target
Coal Creek Pkwy SE	SE 60th St	3	0.72	Meet Target	0.71	Meet Target
108th Ave SE	Bellevue Way SE	3	0.73	Meet Target	0.74	Meet Target
Intersections not meeting the target			6		6	
<i>Area Target</i>			<i>0.85</i>		<i>0.85</i>	

Bellevue Comprehensive Plan EIS Appendix - Transit Travel Time Ratio

2044					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		0.98	1.09	1.01	0.92
Crossroads	1.80		1.81		1.67
Eastgate	1.15	2.15		0.64	2.29
Factoria	1.15		0.53		
Overlake	0.96	2.08	1.96		

2044 A					
	Downtown	Crossroads	Eastgate	Factoria	Overlake
Downtown		0.97	1.08	1.00	0.92
Crossroads	1.81		1.82		1.67
Eastgate	1.16	2.15		0.64	2.30
Factoria	1.17		0.54		
Overlake	0.97	2.09	1.95		

Bellevue Comprehensive Plan EIS Appendix - VMT

	2044		2044 A	
	jobs	persons	jobs	persons
	207,763	210,572	207,763	210,572
	VMT	Network Length	VMT	Network Length
Miles Driven During PM Peak Period	1,133,977	522.711	1,134,008	523.124
Citywide Daily VMT (miles)	4,976,090		5,045,485	
Daily VMT per Person	23.63129951		23.96	
Citywide Annual VMT (millions of miles)	1,627		1,650	

* The model includes system tolling and 30% WFH assumptions



APPENDIX L

Bellevue Housing Economic Policy Analysis: Phase 1

City of Bellevue Housing Economic Policy Analysis: Phase 1 Existing Conditions Report

January 19, 2024

INTRODUCTION

Background and Purpose

The City of Bellevue, King County's second-largest city, is experiencing a housing shortage in line with the remainder of the Puget Sound Region and throughout the country. Housing shortages have resulted in increasingly more expensive housing costs associated in the region, which is creating an additional burden on Bellevue's lower-income households. Additionally, as local policies urge affordable housing development and allocate projected population growth to urban areas, Bellevue's affordable housing needs will continue to rise for the next 25 years.

This two-part study aims to conduct an analysis of housing policy and programs relevant to affordable housing and determine the impact of both voluntary and mandatory affordable housing programs on housing development. Phase I of the study includes:

- An **existing conditions report** (included below) that discusses statewide, regional, and local affordable housing policies and programs, analyzes Bellevue's existing real estate market conditions, and provides an assessment of available affordable housing funding and funding sources used by Bellevue.
- A **policy implications report** that identifies best practices and successful tools that have been used to stimulate the production of affordable housing units based on case studies and secondary research and assesses the policy implications of implementing both voluntary and mandatory affordable housing requirements in Bellevue. This is provided as a separate deliverable to the City of Bellevue.

Phase II of the study will develop a scenario analysis tool that will test parameters of programs recommended in Phase I through a financial feasibility tool. Outputs will summarize financial feasibility and development typologies under three policy scenarios. Each scenario will include the program parameters, including FAR incentives or bonuses, as well as affordable housing requirements and income limits. Findings on the development feasibility impacts of each scenario as well as scenario parameters will be documented in a final report.

Methods

The existing conditions report captures affordable housing policies at the state, region, county, and local levels, in addition to a summary of current affordable housing programs utilized by the City of Bellevue. The report also includes a real estate market analysis that uses data from Redfin, CoStar, and Washington State Office of Financial Management (OFM) to describe residential market conditions in the city. Lastly, an affordable housing funding review was conducted which discusses existing funding mechanisms used by and available to the City of Bellevue.

Organization of the Report

The following report is organized as follows:

- **Housing Policy Requirements and Regulations.** Summary of existing housing policy and regulations at the state, regional, and local levels.
- **Real Estate Market Analysis.** Overview of Bellevue’s current real estate market conditions.
- **Affordable Housing Funding Analysis.** Summary of affordable housing funding sources and mechanisms.

HOUSING POLICY REQUIREMENTS AND REGULATIONS

Growth Management Act Statute and Recent Amendments

The Growth Management Act (GMA) provides the fastest-growing cities and counties in Washington with a framework to plan for growth through a series of statutes first adopted in 1990 and amended several times since. King County and the City of Bellevue are full GMA-planning jurisdictions. A fundamental requirement for cities and counties planning under GMA is to undertake and periodically update a Comprehensive Plan made up of 8 required elements that guide development regulations, including for housing ([RCW 36.70A.130](#)).

House Bill 1220: Planning for and Accommodating Housing Needs

In 2021, House Bill 1220 amended the GMA and changed the way communities are required to plan for housing. The GMA housing goal now calls for planning for and accommodating housing affordable to all economic segments of the population ([RCW.36.70A.020](#)). This significantly strengthened the previous goal, which was to encourage the availability of affordable housing. The housing goal also calls for

promoting a variety of residential densities and housing types and preservation of existing housing stock.

Cities and counties planning under the GMA must include a housing element in their comprehensive plans ([WAC 365-196-410](#)). [RCW 36.70A.070\(2\)](#) sets out the requirements for a housing element which have changed with the adoption of HB 1220 in 2021. The changes include:

- An inventory and analysis of existing and projected housing needs by income level as provided by the Department of Commerce;
- Planning for sufficient land capacity for housing needs, including all economic segments of the population (moderate, low, very low and extremely low income, as well as emergency housing and permanent supportive housing);
- Policies for moderate density housing options within Urban Growth Areas (UGAs), including but not limited to duplexes, triplexes, and townhomes;
- Making adequate provisions for housing for existing and projected needs for all economic segments of the community, including documenting programs and actions needed to achieve housing availability, consideration of housing locations in relation to employment locations and consideration of the role of accessory dwelling units (ADUs) in meeting housing needs; and
- Identifying racially disparate impacts, displacement and exclusion in housing policies and regulations, and beginning to undo those impacts; and identifying areas at higher risk of displacement and establishing anti-displacement policies.

House Bill 1110 “Middle Housing” and House Bill 1337 “Accessory Dwelling Units”

In 2023, House Bill 1110 further amended the GMA and shifted state-wide land use policies to increase housing density in fully planning cities in Washington. The City of Bellevue must implement the requirements of HB 1110 no later than June 30, 2025. The law requires the City of Bellevue, a fully GMA-planning city with a population over the legislative threshold of 75,000 residents, to allow¹:

- At least 4 units per lot in predominantly residential zones;
- At least 6 units per lot within .25 miles walking distance of a major transit stop in predominantly residential zones; and

¹ Final Bill Report, Engrossed House Bill 1110, Washington State Legislature.

- At least 6 units per lot in predominantly residential zones, if at least two units are affordable housing.

HB 1110 allows jurisdictions the ability to enforce these changes to 75% of the lots that are dedicated to single-family detached housing units, given the remaining 25% are restricted to areas that may be subject to future displacement, lack sufficient infrastructure, or are in environmentally critical areas prone to flooding.

HB 1110 creates an affordability bonus (allowing additional units in a development if they are affordable) and includes requirements for the affordable housing sizes and configurations to be similar to market rate units. It also allows cities with affordable housing incentive zoning programs to vary these requirements and require any development, including middle housing², to provide affordable housing, either on site or through an in-lieu payment³. Affordable units produced as a result of increased development by HB 1110 must retain income restrictions for at least 50 years, including up to 60% of AMI for renter households, and 80% of AMI for ownership dwellings.

HB 1110 directs the Washington State Department of Commerce (Commerce) to develop middle housing model ordinances for implementing the bill. Commerce will also develop a user guide that will cover topics that are not directly addressed in the model ordinance, such as financial, physical, and administrative considerations for affordable middle housing units.

Another bill enacted in 2023 is House Bill 1337 which requires GMA-planning cities like the City of Bellevue to permit two ADUs per lot in all UGAs and eases other ADU occupation restrictions and regulations.⁴ HB 1337 permits both attached accessory dwelling units (AADU) and detached accessory dwelling units (DADU). Any combination of up to two total ADUs is allowed on the same lot. While ADUs are generally more affordable than a typical single-family home, most are not affordable to households earning less than 80% of the area median income (AMI)⁵. Jurisdictions can offer incentives to encourage ADUs

² Middle housing includes homes that are in between the size of a single-family home and large multi-unit properties that typically include between two and six units.

³ Final Bill Report, Engrossed House Bill 1110, Washington State Legislature..

⁴ Final Bill Report, Engrossed House Bill 1337, Washington State Legislature.

⁵ Washington State Department of Commerce, Guidance for Accessory Dwelling Units in Washington State, May 15, 2023.

that are affordable to lower-income households, like higher densities in the form of an additional ADU or requiring affordability in exchange for providing a “bonus”.

Other housing legislation including affordable housing specific legislation from 2023 is summarized in Appendix A.

Countywide Planning Policies

The GMA includes a requirement that fully planning counties and their cities develop countywide planning policies (CPPs) to promote coordination and consistency for items of regional importance within the county. [RCW 36.70A.210](#) requires that CPPs address “policies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution”. For King, Kitsap, Pierce, and Snohomish counties CPPs local policies must also align with multicounty planning policies (MPPs) in Puget Sound Regional Council’s Vision 2050. The MPPs from Vision 2050 relevant to housing can be found in Appendix B.

A major update of the King County CPPs occurred in 2021. As part of the motion to adopt that update, the Growth Management Planning Council (GMPC), a body of elected officials from King County and the cities that oversee the CPPs, directed additional work on affordable housing. This additional work resulted in recommended amendments to the CPPs which were adopted by the King County Council in August 2023 and ratified by the Bellevue City Council on November 20, 2023, in Resolution 10320. For the amendments to become effective at least 30% of city and county governments representing 70% of King County population must ratify by November 30, 2023. The amendments are meant to⁶:

- Establish **countywide and jurisdictional housing needs**, informed by local data and guidance provided by Commerce.
- Establish an **accountability framework** for equitably meeting countywide affordable housing needs.
- Align **monitoring requirements** with the new accountability framework.
- **Align the policies** with the GMA as amended by 2021 Washington State House Bill 1220.

⁶ King County, AN ORDINANCE adopting and ratifying amendments to the 2021 King County Countywide Planning Policies, 2023-0224 Transmittal letter, June 21, 2023.

Jurisdictional Housing Need and Allocations

The methodology establishing the housing needs and allocations by income for jurisdictions in King County was informed by guidance from Commerce and represents a collaborative effort between Affordable Housing Committee members, jurisdictional staff, subject matter experts, and communities most impacted by housing cost burden⁷.

The housing needs established within the CPP amendments allocate 35,000 net new units to Bellevue through 2044. Of these, 26,975 or 77% target affordability levels serving households earning 50% AMI or less, typically requiring the most subsidy from public funding sources (**Exhibit 1**). An additional 8% target affordability levels between 51% and 80% of AMI. In total 29,646, or 85% target affordability levels serving households earning 80% or less of AMI.

Exhibit 1. Bellevue Net New Units Allocation by 2044

Area Median Income	Net New Units Allocation	% of Total
30% and below	18,195	52%
31%-50%	8,780	25%
51%-80%	2,671	8%
81%-100%	703	2%
101%-120%	798	2%
121% and above	3,853	11%
Total	35,000	100%

Sources: King County, GMPC Motion 23-1, 2023; Community Attributes Inc., 2023.

As part of the Bellevue 2024–2044 Comprehensive Plan Periodic Update, the city is analyzing as part of an Environmental Impact Statement the impacts of development capacity that would occur beyond the 2044 growth target of 35,000 housing units. The additional development capacity beyond the 2044 housing targets allows the city to meet its growth targets in different ways, letting potential developers

⁷ King County Housing Needs Dashboard, <https://tableaupub.kingcounty.gov/t/Public/views/AllocationMethodComparisonsUpdated/AllocationsStory?%3Aembed=y&%3AisGuestRedirectFromVizportal=y&%3Aorigin=card> share link

respond to the market demands relating to the type of housing and commercial space and provide flexibility for market demands⁸.

The CPPs policies guide jurisdictions through a five-step process that is meant to help them plan for and accommodate their share of countywide housing needs⁹:

- Conduct a housing inventory and analysis.
- Implement policies and strategies to meet housing needs equitably.
- Ensure alignment with CPP Housing Chapter goals through GMPC or designee review of comprehensive plans.
- Monitor and report at least annually to evaluate progress in achieving CPP Housing Chapter goals.
- Adjust strategies to meet housing needs.

Monitoring and Reporting

The CPPs provide guidance to jurisdictions and sets policies to guide their participation in the monitoring and reporting process to ensure that they are successful in their efforts to plan for and accommodate their share of allocated countywide housing needs and meet the goals of the CPPs Housing chapter. Some of the monitoring and reporting actions are¹⁰:

- The GMPC or its designee will conduct a housing focused review of all King County jurisdictions' draft Housing elements as a part of the periodic comprehensive plan update process, including a comprehensive review five years after a periodic comprehensive plan update, to assess program successes and shortfalls.
- The County and cities will collect and report housing data at least annually to help evaluate progress toward meeting countywide and jurisdictional housing needs and eliminating disparities in access to housing and neighborhood choices. The County will help coordinate a necessary data collection and reporting process with cities.

⁸ 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation, Draft Environmental Impact Statement, City of Bellevue, April 2023.

⁹ King County GMPC, Motion 23-1, March 22, 2023.

¹⁰ Ibid.

City of Bellevue Programs

As per [RCW 36.70A.540](#), local governments planning under GMA can enact *affordable housing incentive programs* to encourage the development of affordable housing through development regulations or conditions on rezoning or permit decisions, or both, on residential, commercial, industrial, or mixed-use development. The programs may include mandatory or optional elements, such as density bonuses within the UGA, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting, tiny house communities, or mandatory amount of affordable housing provided by each development.

As outlined by RCW 36.70A.540, incentives or bonuses shall provide units for low-income rental (50% AMI or less) or for purchase (80% AMI or less). Jurisdictions have the discretion to increase income levels to address local housing needs and market conditions. Income limits for rental units may not exceed 80% of AMI and may not exceed 100% of AMI for ownership units. Low-income housing developed under an affordable housing incentive program must remain affordable for 50 years or a jurisdiction may accept payments in lieu of continuing affordability. Affordable housing incentive programs may also allow payment of money or property in lieu of housing units¹¹.

Affordable housing incentive programs can take many forms. Different definitions in the literature are provided for “incentive zoning”, “density bonus”, “inclusionary zoning”, or “commercial fee in-lieu”.

The City of Bellevue considers inclusionary zoning programs as regulatory tools that incentivize affordable housing in exchange for additional development capacity, generally height, floor area ratio or other benefits to the development¹². The programs can have the following characteristics¹³:

- Apply to residential, commercial, and mixed-use development.
- Are voluntary (allow developers to choose incentives such as density bonuses or tax incentives in exchange for building affordable housing) or mandatory (have an explicit requirement to include some units at certain affordability levels or require the developer to pay an in-lieu fee).

¹¹ Washington State Legislature, RCW 36.70A.540.

¹² City of Bellevue, <https://bellevuewa.gov/city-government/departments/community-development/housing/constructing-affordable-housing>.

¹³ City of Bellevue, *Affordable Housing Tools*, November 14, 2022.

- Allow for on-site performance, off-site performance, or a fee in-lieu.
- Can include zoning, tax, and development capacity incentives.

The City of Bellevue presented an Affordable Housing Tools Update to Bellevue City Council on November 11, 2022. This report uses terminology and definitions from that presentation.

- **Mandatory Inclusionary Zoning:** A mandatory program requires the construction of a minimum number of affordable housing units or fee-in-lieu payment for all development.
- **Voluntary Inclusionary Zoning:** A voluntary program using incentives or bonuses to encourage developers to provide affordable housing units; also known as incentive zoning or density bonus.
- **Commercial Fee-In-Lieu:** A program requiring commercial development to make payments to support the construction of affordable housing units.

Exhibit 2 outlines the affordable housing incentive programs adopted by the City of Bellevue under analysis for this study. Additional information about each housing program is available in this section. There are other programs in Bellevue that support affordable housing production, but this review is limited to affordable housing incentive programs under analysis for this study.

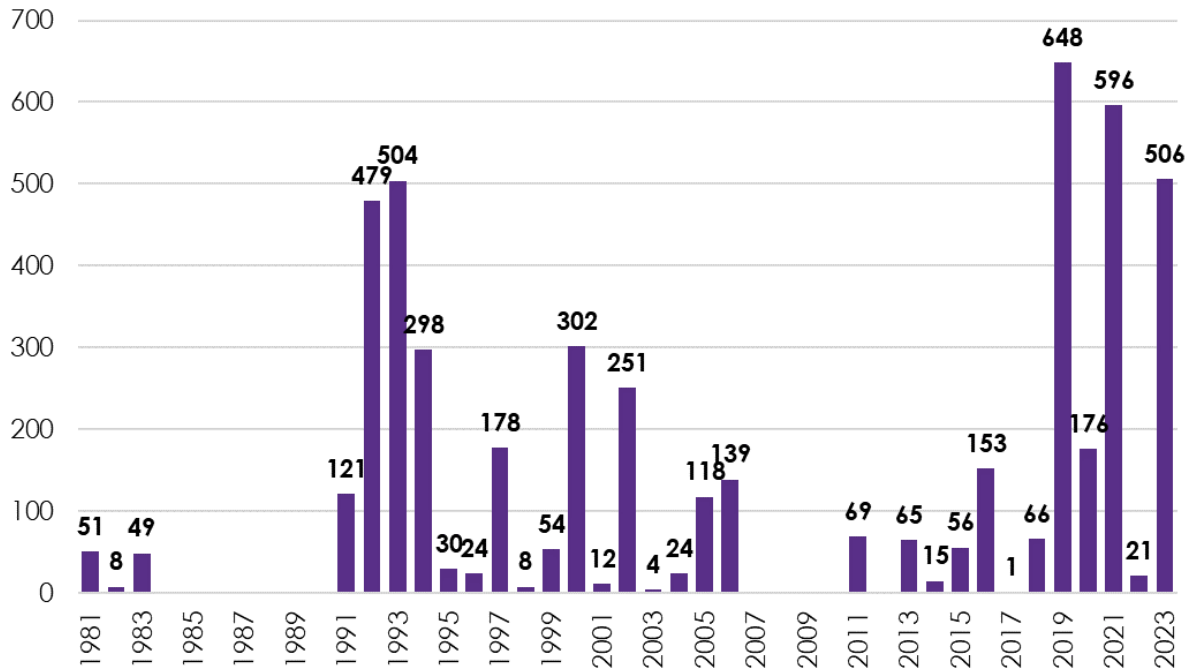
In total, Bellevue has 5,026 income-restricted affordable housing units currently in service. The timeline of these units is shown in **Exhibit 3** using data provided by the City of Bellevue. During this time, 2019 and 2021 saw the largest numbers of affordable units come into service (a total of 1,182 units comprising 24% of all Bellevue’s affordable housing stock). This recent affordable unit production is primarily a result of enactment of the 2017 Affordable Housing Strategy, which prioritizes establishing a high-level and sustainable level of funding for affordable housing production and preservation from state, county, and local funding sources, and King County Housing Authority’s purchase of several properties in Bellevue in recent years.

Exhibit 2. Bellevue Affordable Housing Incentive Programs

Program Type	Program Name	Type	City Code Reference	Fee in-lieu	Geography	Program Start	Income – Restricted Units Produced
Voluntary Inclusionary Zoning	Current Citywide Density Bonus program	Voluntary	LUC 20.20.128	No	Citywide	1996	95 units
Mandatory Inclusionary Zoning	Past Mandatory Density Bonus program (1991-1996)	Mandatory	N/A	No	Citywide	1991	170 units
Voluntary Inclusionary Zoning	Incentive Zoning: Location Specific Density Bonuses (FAR and Amenity Incentives)	Voluntary	LUC 20.25D.090.C	Yes (\$7.6 mil generated)	BelRed	2009	181 units (includes pipeline)
		Voluntary	LUC 20.25A.070.c.2	No	Downtown	2017	24 units
		Voluntary	LUC 20.25P.060.B.2.a/ LUC 20.20.010 (note 49)	No	Eastgate TOD/ Neighborhood Mixed Use District	2017	None to date
		Voluntary	LUC 20.25Q.070	Yes, commercial	East Main District	2021	None to date
Other	Multi-Family Housing Tax Exemption (MFTE)	Voluntary	Chapter 4.52 BCC	No	Citywide	2015	84 units

Source: City of Bellevue, Affordable Housing Tools, November 14, 2022; City of Bellevue, Affordable Housing Inventory, 2023; Community Attributes, 2023; A Regional Coalition for Housing (ARCH).

**Exhibit 3. Number of New Affordable Housing Units in Service by Year
(including Bellevue Affordable Housing Incentive Programs and
Other Income-Restricted Units), 1981 to 2023**



Source: City of Bellevue, 2023; Community Attributes, 2023.

Citywide Density Bonus

The citywide density bonus program, also referred to by the City of Bellevue as a voluntary inclusionary zoning program, provides a density bonus of up to 15% above existing density limits with the inclusion of affordable units for multifamily developments. Projects with affordable units can also earn increased lot coverage and reduced parking and open space requirements as additional incentives. Units must be affordable to residents earning less than 80% of AMI, and units must be affordable for the life of the project.

In 2017, the City of Bellevue adopted the Affordable Housing Strategy Land Use Code Amendment (LUCA) Action C-1, which offers density bonuses for affordable housing developments on land owned by public entities, faith-based groups, and non-profit housing organizations. In December 2021, the City of Bellevue adopted Ordinance 6626 which established a 50% density bonus for affordable housing developments meeting the criteria outlined in Action C-1. Additionally, the Bellevue City Council adopted Ordinance 6743 in June 2023, which established development criteria for qualifying organizations and landowners to leverage the density bonuses outlined in Action C-1.

Mandatory Inclusionary Zoning

Between July 1991 and February 1996, the City of Bellevue had a mandatory inclusionary zoning program that required all new multifamily development with more than 10 units to include 10% of units affordable at 80% AMI. The bonus was also available to new single family subdivision developments greater than 10 lots. A bonus of one market rate unit was permitted for each affordable unit provided, up to 15% above the maximum allowed zoning density.

Location Specific Density Bonuses

The City of Bellevue outlines the following affordability conditions required to receive density bonuses offered for affordable housing developments.

- **Downtown.** At least 1 square foot of affordable housing space for every 2.5 square feet of market-rate units. In other words, 1 in 3.5 square feet (28.6%) of the additional FAR must be made up of affordable housing to receive the offered density bonus.
- **BelRed.** In exchange for the bonus density, the development must provide at least 1 square foot of affordable housing for every 4.5 square feet of market-rate rentals or for every 7.2 square feet of market-rate owner-occupied units. Additionally, rental units must be affordable for households earning up to 80% of the AMI and sale units must be affordable to households earning up to 100% AMI. Developers can pay a fee-in-lieu to leverage these bonuses without producing affordable units. The fee is \$26.85 per square foot of bonus area for Tier I residential units and \$22.38 per square foot of bonus area for Tier 2 units and nonresidential components.
- **Eastgate and Neighborhood Mixed Use Districts.** At least one affordable unit for every 2.5 market-rate units. Affordable studio and 1-bedroom units are also given a reduced parking ratio of 0.25 spaces per unit. Affordable units provided as part of these incentives must remain affordable for the life of the project.
- **East Main Transit Oriented District.** To leverage the incentive bonus available, the development must earn 80% or more of the project's amenity points through affordable housing. For nonresidential development, the focus is on childcare services, potential streets, open space, affordable housing, pedestrian bridge or performing arts space amenities and a development needs to earn 75% or more of a project's required amenity points from these. The provision of affordable housing earns development 3.2 bonus square feet per 1 square foot of

affordable housing. Developers may also pay a fee-in-lieu to access the density bonus on the nonresidential component of the development, \$30 per square foot of bonus area.

Multi-Family Housing Property Tax Exemption

The Multifamily Tax Exemption Program (MFTE) is a voluntary affordable housing incentive for new multi-family rental developments. The MFTE provides a 12-year exemption from property taxes paid on the housing portion of qualifying projects in exchange for setting aside 20% of the units for income eligible households for those 12 years.

To date, developers who have leveraged the 12-year MFTE program have constructed 84 income-restricted units and 330 market-rate units in Bellevue. This includes 16 units restricted at or below the 60% AMI threshold, 47 at or below 70% AMI, and 21 at the 80% AMI level. An additional 54 income-restricted units at 80% of AMI and 348 market-rate dwellings are currently under construction.¹⁴ A total of 862 units have been approved but not yet put into service for MFTE in Bellevue, including 173 income-restricted units at the 80% AMI threshold, and 689 market-rate units.

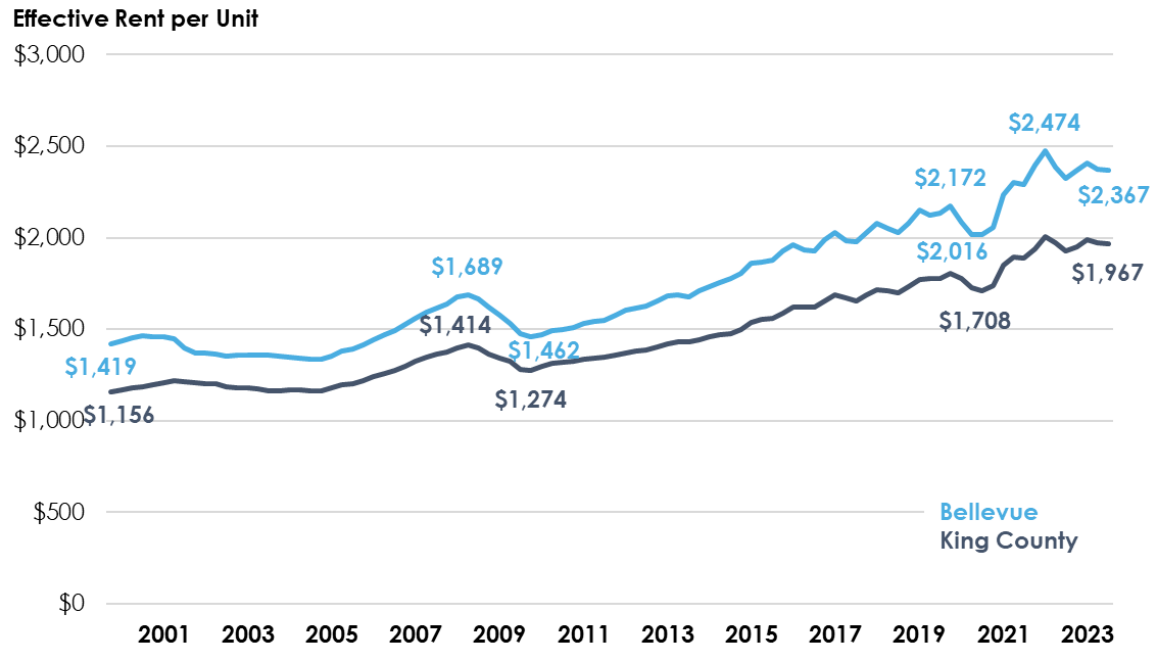
REAL ESTATE MARKET ANALYSIS

The following section reviews current real estate market conditions in Bellevue and aims to provide a greater understanding of Bellevue’s single-family and multifamily housing markets, retail, and office markets.

Effective rents, which account for concessions and pass through expenses, have remained near \$2,400 per unit in Bellevue since early 2022. During this time, the average unit size in Bellevue was roughly 850 square feet, placing effective rents near \$2.80 per square foot. By comparison, the average effective rent per unit in King County has remained near \$2,000 since early 2022. Average unit size throughout King County is smaller, settling near 770 square feet since 2018, putting 2022 through 2023 rents around \$2.60 per square foot, or about 20 cents lower than the Bellevue average (**Exhibit 4**).

¹⁴ A Regional Coalition for Housing (ARCH), 2023.

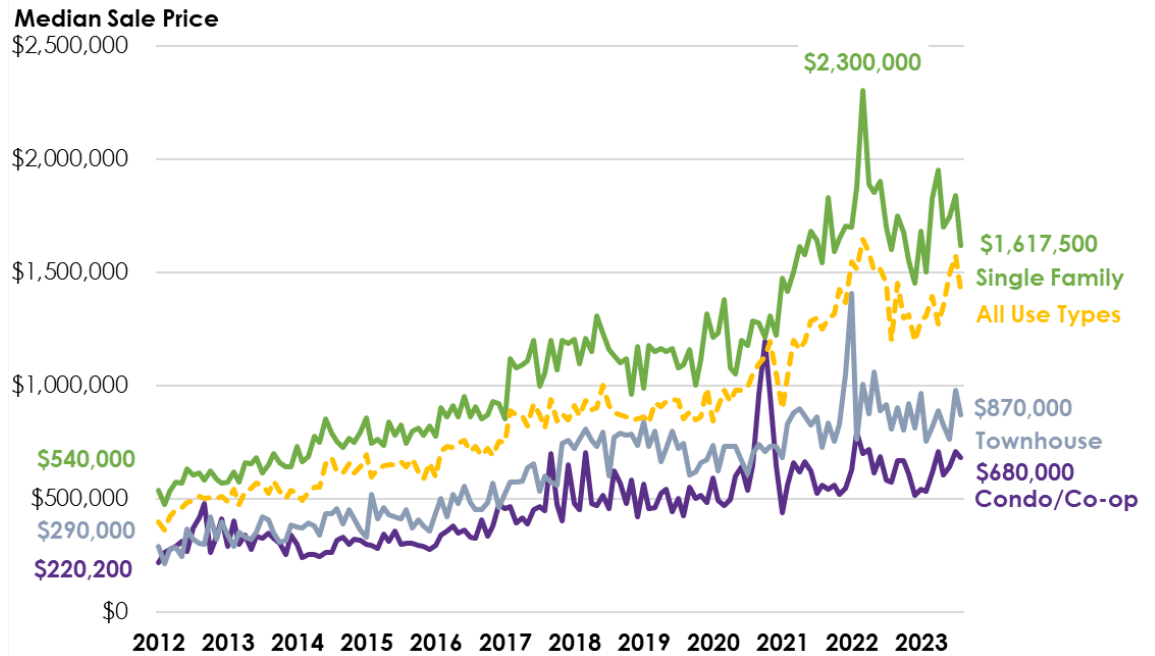
Exhibit 4. Median Multifamily Rents, Bellevue and King County, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Exhibit 5 presents median sale prices by unit for Bellevue homes from 2012 to 2023. Single family sale prices have steadily increased since 2012 and peaked in March 2022, when the median sale price of single-family homes reached \$2.3 million. Bellevue’s townhouses and condominiums have seen similar but less severe price increases since 2012. Townhouse median sale prices peaked at \$1.4 million in January 2022, while condominium median sale prices peaked at \$1.2 million in October 2020.

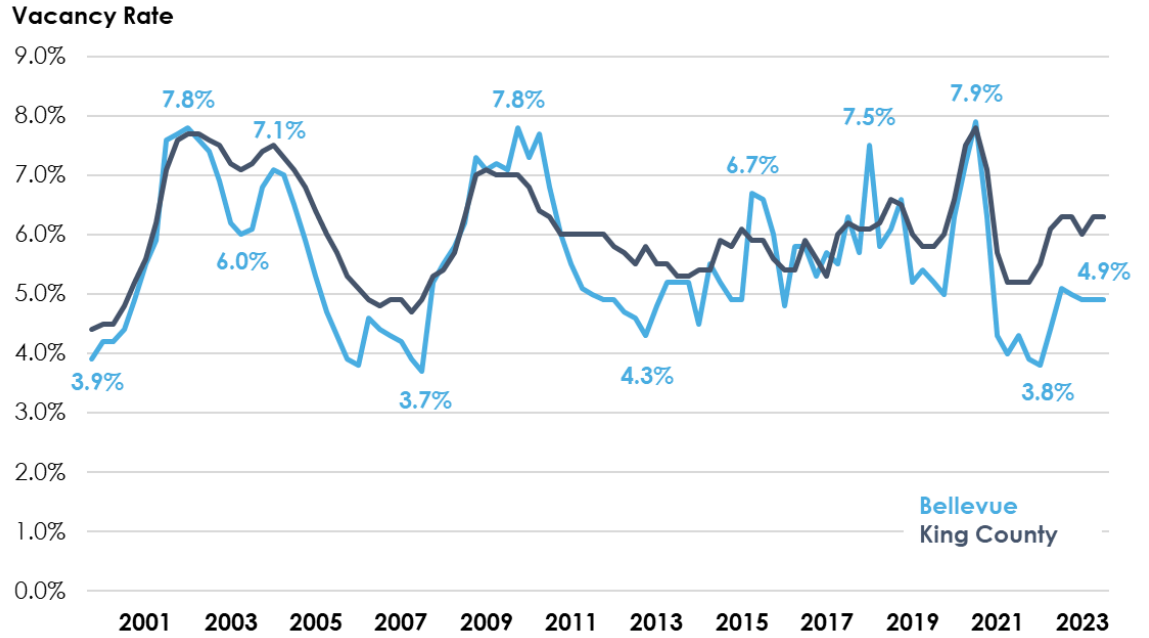
Exhibit 5. Median Sale Price by Use Type, Bellevue, 2012 – 2023



Sources: Redfin, 2023; Community Attributes Inc., 2023.

Multifamily vacancy rates in Bellevue have fluctuated between roughly 3.5% and 8% since 2000. Since 2014, Bellevue vacancy rates have seen a greater degree of quarter-to-quarter volatility. Currently, CoStar data show multifamily vacancy rates are near 5% in Bellevue (**Exhibit 6**).

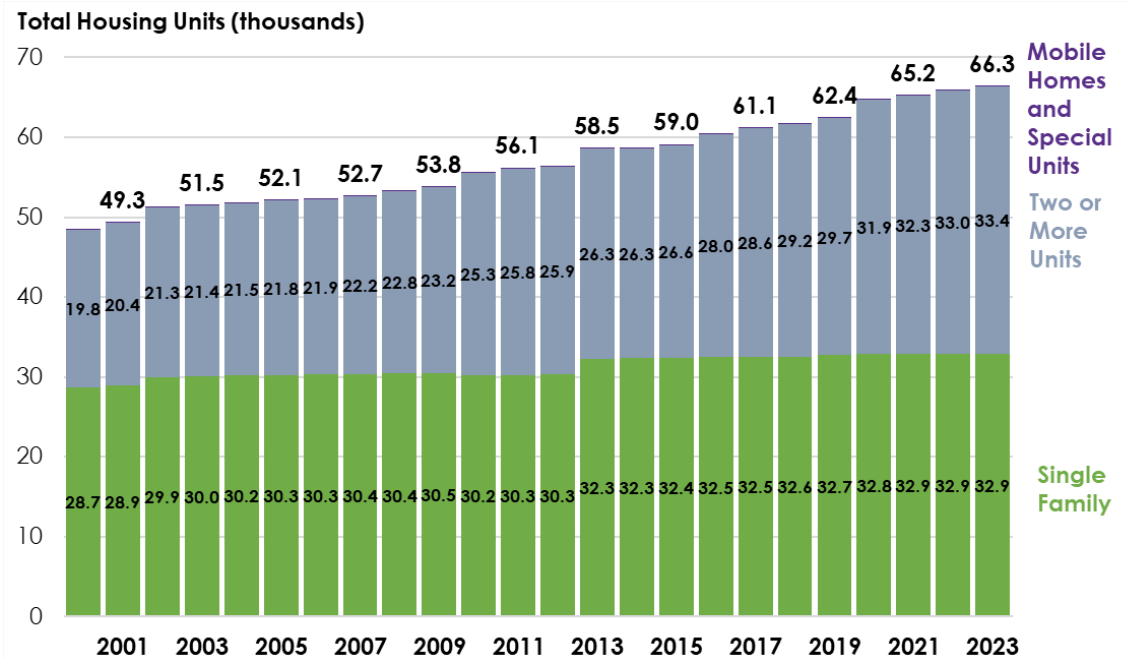
Exhibit 6. Multifamily Vacancy Rates, Bellevue and King County, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

In 2023, single-family residences represented roughly 50% of Bellevue’s total housing stock. The share of single-family homes in Bellevue has decreased by about 10% since 2000, when nearly 60% of housing inventory was represented by single-family residential. Duplexes or other multifamily structures account for the remainder of Bellevue’s housing inventory. In 2023, Bellevue’s 66,300 housing units comprised 33,400 multifamily units, 32,900 single-family units, and less than 100 mobile homes or special units (**Exhibit 7**).

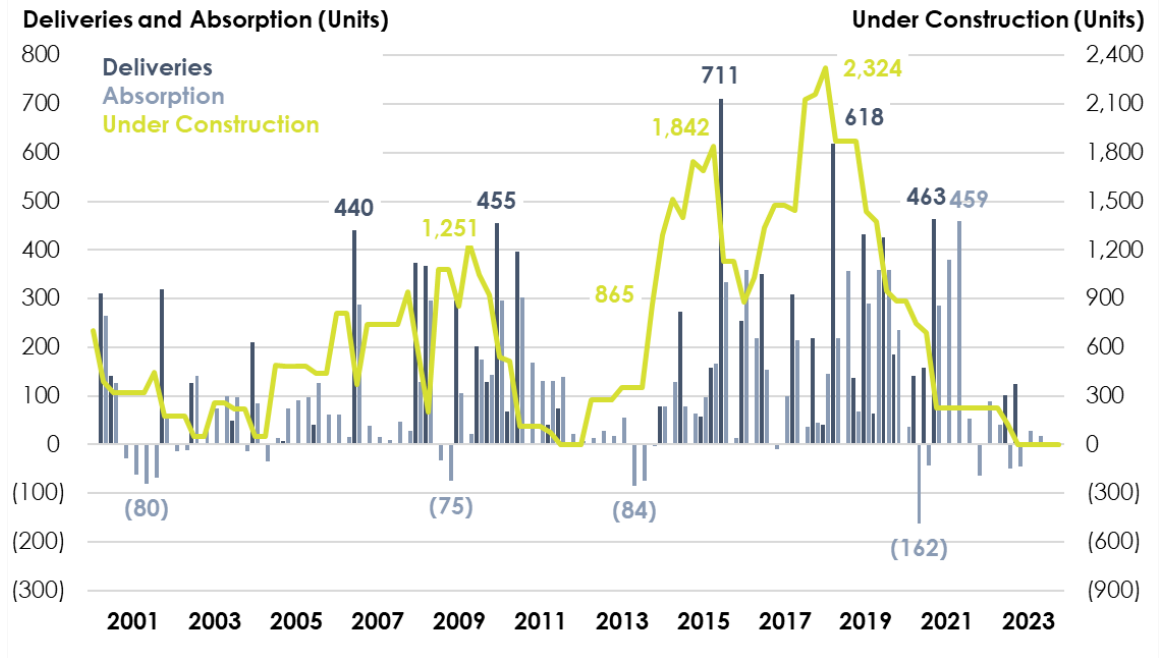
Exhibit 7. Inventory by Use Type (Units), Bellevue and King County, 2000 – 2023



Sources: OFM, 2023; Community Attributes Inc., 2023.

Units under construction in Bellevue have fluctuated between zero and 2,300 since 2000. Units under construction suggest a cyclical nature to the building cycle, with peaks seen in 2009, 2015, and 2018. Following under construction units, Bellevue has received steady but cyclical multifamily deliveries since 2000. Absorption has typically been positive, keeping up with unit deliveries and suggesting Bellevue has seen few units leave the market since 2000 (**Exhibit 8**).

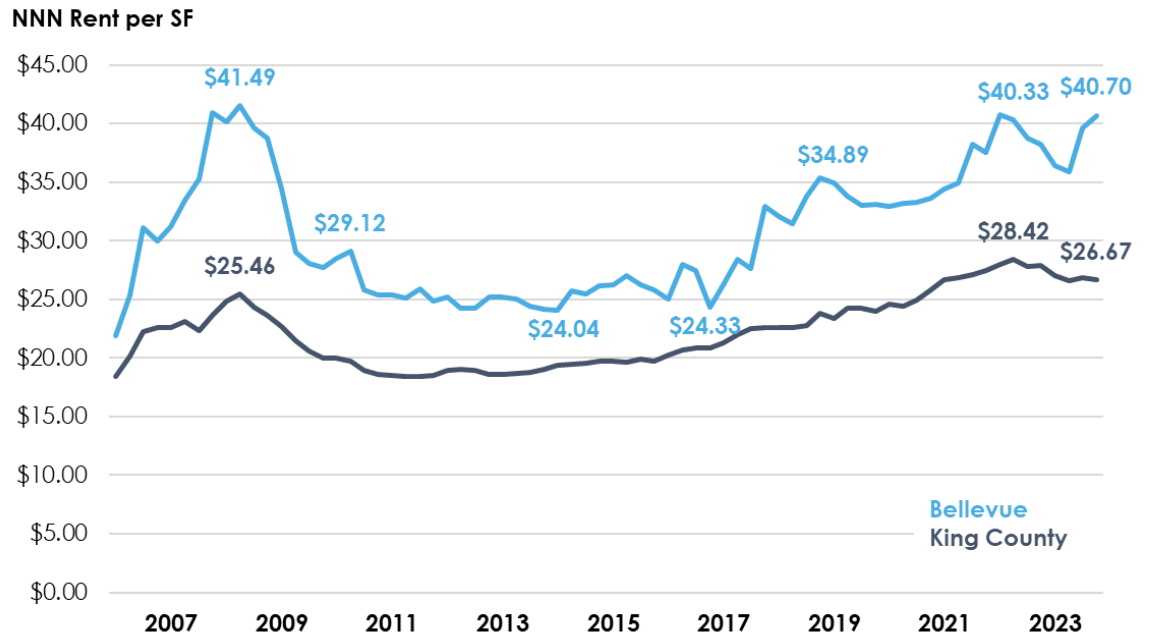
Exhibit 8. Multifamily Units Delivered, Absorbed, and Under Construction, Bellevue, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Triple Net (NNN) retail rental rates in Bellevue peaked in 2008 at nearly \$42 per square foot prior to falling to as low as \$24 per square foot. In 2023, Bellevue’s retail rental rates have returned to greater than \$40 per square foot. Since 2006, retail rates in King County have seen less volatility and currently sit almost \$15 less per square foot than the rates seen in Bellevue (**Exhibit 9**).

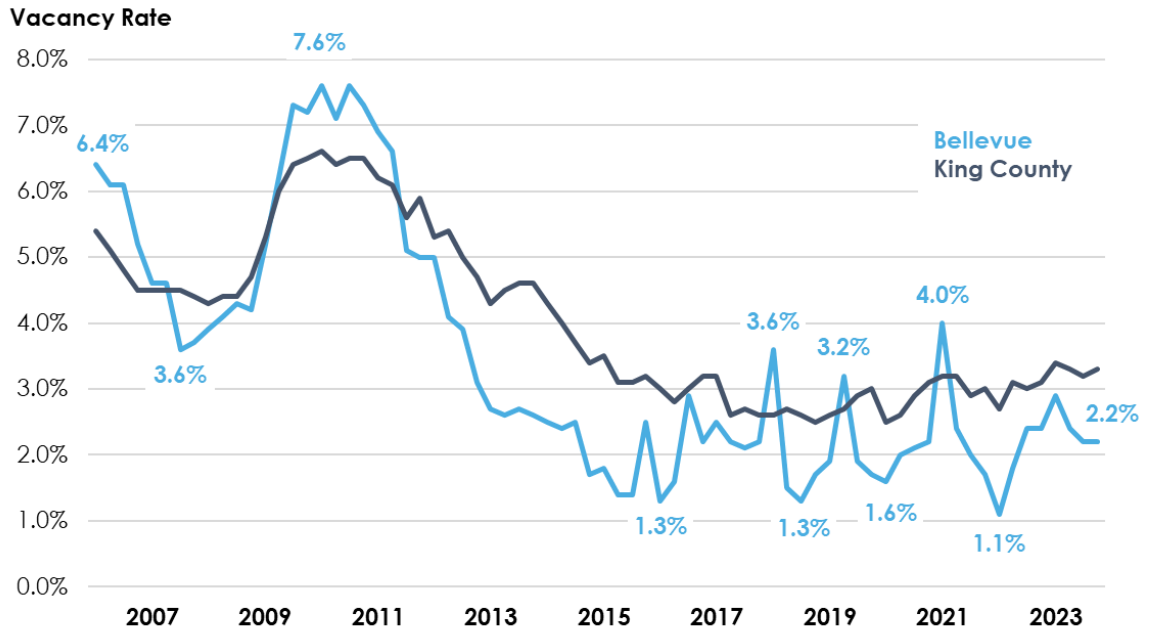
Exhibit 9. Retail Rental Rates, Bellevue and King County, 2006 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

While experiencing different degrees of quarter-to-quarter fluctuations, retail vacancy rates in Bellevue and King County have generally remained similar since 2006. In late 2023, Bellevue’s retail vacancy rate was 2.2% (**Exhibit 10**).

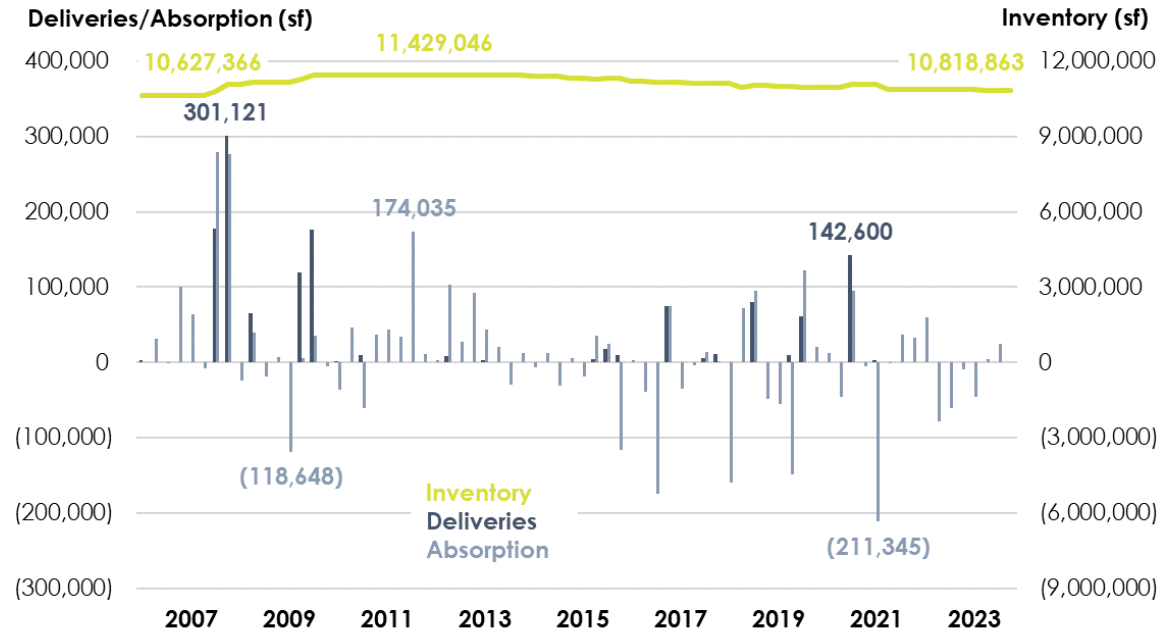
Exhibit 10. Retail Vacancy Rates, Bellevue and King County, 2006 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Retail inventory has remained between 10.5 million and 11.5 million square feet since 2006. While Bellevue did experience consistent deliveries from 2016 to 2020, net absorption has primarily been negative since 2015. Bellevue’s retail inventory has reflected this negative absorption, with inventory declining by about 500,000 square feet during this period (**Exhibit 11**).

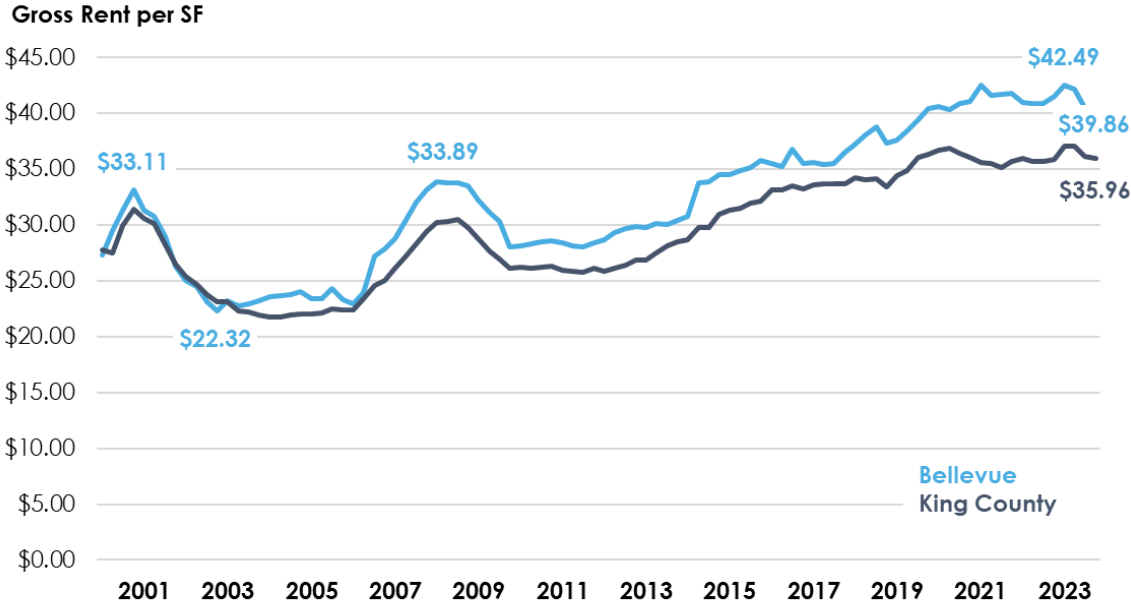
**Exhibit 11. Retail Inventory, Deliveries, and Absorption, Bellevue, 2006
– 2023**



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Bellevue and King County office rents closely mirrored one another from roughly 2000 to 2019, fluctuating between \$20 per square foot to \$40 per square foot. Since the onset of the COVID-19 pandemic, Bellevue’s office rents have increased above county rental rates, peaking at \$42.50 and remaining near \$5 higher than the average county rate (**Exhibit 12**).

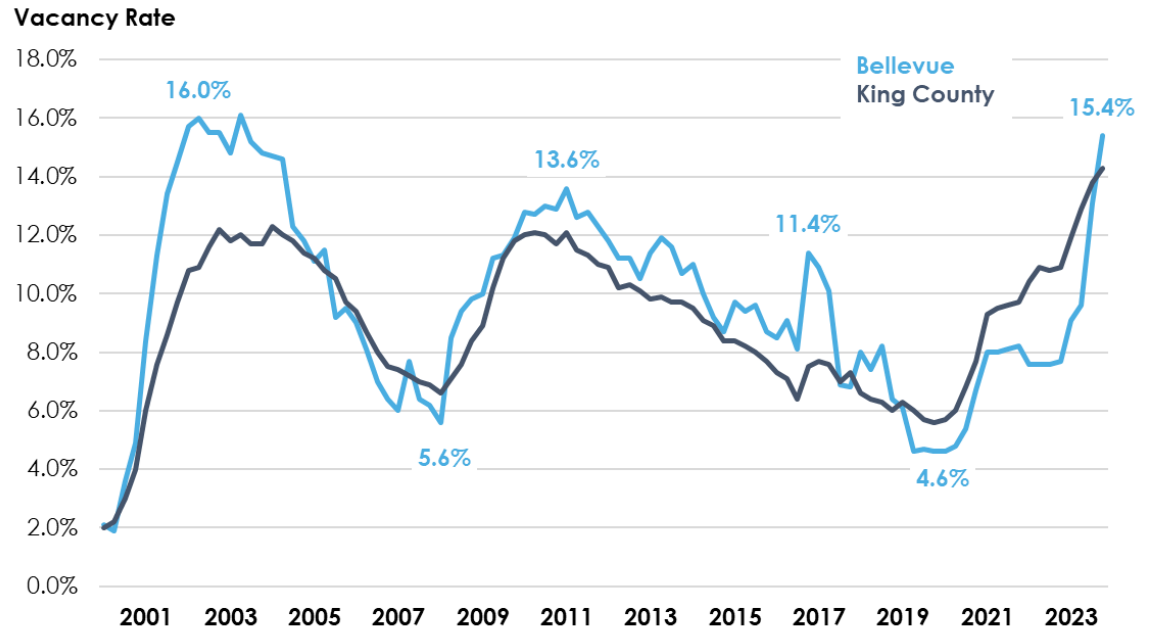
Exhibit 12. Office Rental Rates, Bellevue and King County, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Apart from a few years in the early 2000s, Bellevue and King County office vacancy rates have remained similar since 2000. Office rents in both markets have increased by about 10% since 2019, with Bellevue’s current office vacancy rate sitting greater than 15% (**Exhibit 13**). This is in part due to COVID-19 pandemic induced remote work trends which have led to increases in office vacancy rates across the entire Puget Sound region in recent years. Additionally, there have been some large deliveries of office space in Bellevue in 2023.

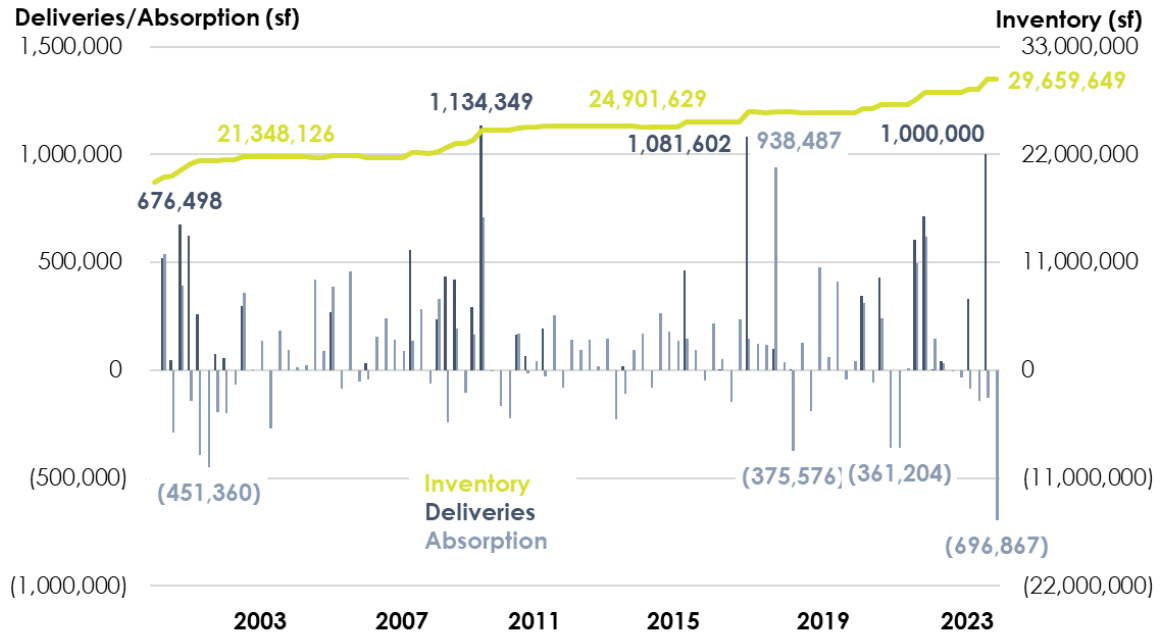
Exhibit 13. Office Vacancy Rates, Bellevue and King County, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Bellevue’s office inventory has steadily increased since 2000. Recent and large office deliveries of more than one million square feet were brought online in Bellevue in late 2016 and 2023. Current office inventory in Bellevue currently sits at nearly 30 million square feet. Absorption since 2000 has generally been steady, suggesting Bellevue’s office market has historically been healthy (**Exhibit 14**).

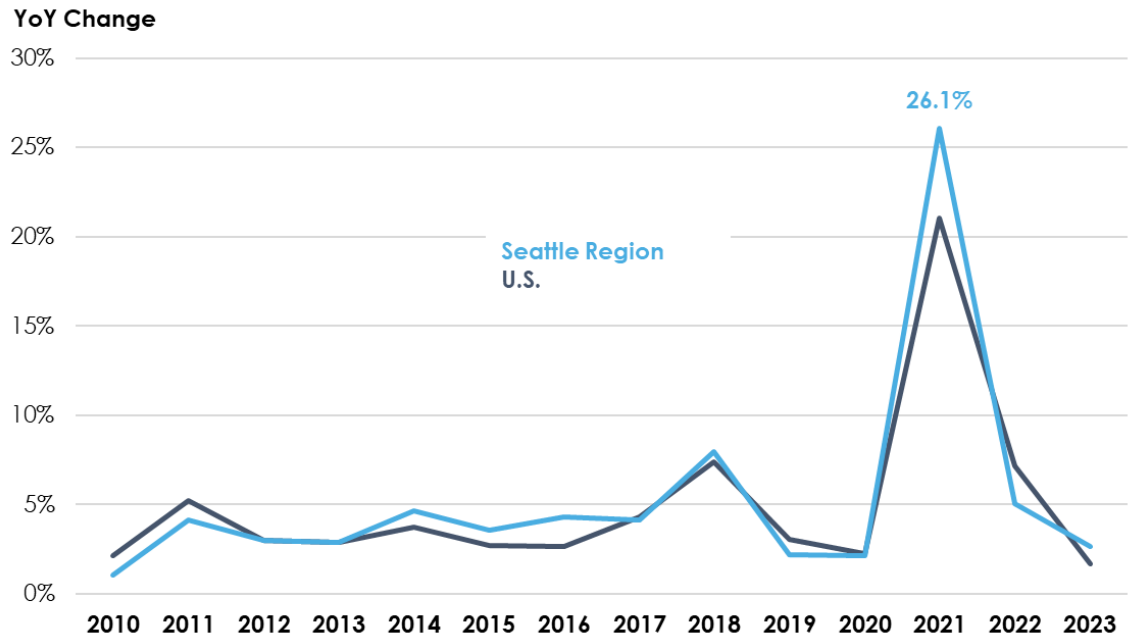
Exhibit 14. Office Inventory, Deliveries, Absorption, Bellevue, 2000 – 2023



Sources: CoStar, 2023; Community Attributes Inc., 2023.

Prior to 2021, construction prices steadily increased by roughly 5% year-over-year. From 2020 to 2021, construction prices increased by 26.1% in the Seattle Region (the metro area which encompasses King, Pierce, and Snohomish counties), slightly outpacing the nationwide growth rate. Since 2021, construction price growth has returned to pre-pandemic levels, but construction prices have remained well above pre-pandemic levels (**Exhibit 14**).

Exhibit 15. Year-Over-Year Change in Construction Cost Index, Seattle Region and U.S., 2010 – 2023



Sources: Mortenson, 2023; Community Attributes Inc., 2023.

AFFORDABLE HOUSING FUNDING ANALYSIS

The City of Bellevue currently uses a variety of funding sources and programs to support affordable housing. These range from sales and use taxes to general fund revenues to grant or tax credit programs. The City of Bellevue tracks affordable housing unit production and program use. Data from the City shows that Bellevue has had more than 5,000 affordable units come online as a result of their programs. Since 2013, the City of Bellevue's housing fund has received nearly \$57 million in revenue to put towards affordable housing. This excludes funding from other sources leveraged to support affordable housing in Bellevue. An overview of revenue sources generated or allocated by the City of Bellevue is in **Exhibit 16**.

In addition to revenue sources generated or allocated by the City of Bellevue for affordable housing, this section also provides a summary of other revenue sources that housing providers currently use to support affordable housing in Bellevue, as well as funding sources the City of Bellevue does not currently use but may leverage in the future for affordable housing.

Most affordable housing projects leverage multiple funding streams. Programs, like the ARCH Housing Trust Fund, prioritize projects that

can leverage multiple sources of funding. Plymouth Housing’s Eastgate Permanent Supportive Housing is one example of a project receiving ARCH Housing Trust Fund resources as well as low-income housing tax credits (LIHTC).

Revenue Sources Generated or Allocated by the City of Bellevue

Exhibit 16. Affordable Housing Revenue Sources Generated or Allocated by the City of Bellevue

Fund Source	Use of Funds	Amount
HB 1590 Housing & Related Services Sales Tax	Capital and ongoing maintenance and operation funds for new construction and acquisition for specific populations making <60% AMI	>\$26 million collected since 2020
HB 1406 Affordable Housing Sales Tax Credit	New construction for households making <60% AMI	>\$2.4 million collected since 2020
Affordable Housing Contingency Capital Investment Program (CIP) Fund	Priorities for use of these revenues are based on City Council direction, with the purpose of providing funding beyond current levels to support affordable housing especially for households earning less than 60% of AMI.	\$23 million in programmed expenditures; \$9 million appropriated
BelRed in-Lieu Fees	Collected in-lieu fees must be used to develop the amenity for which they were paid.	Approx. \$11.7 million collected between 2013-2023
Multi-Family Housing Tax Exemption (MFTE)	New multi-family construction with 20% of units for households making <60% AMI	N/A
ARCH Housing Trust Fund	New construction, acquisition, or rehabilitation for households making <50% AMI; ARCH annually sets funding priorities and target populations	Between 2017-2021, ARCH allocated \$1,294,001 to Bellevue projects

Source: City of Bellevue, 2023; Community Attributes, 2023.

Housing & Related Services Sales Tax

The Housing and Related Services Sales Tax is a maximum 0.1% sales tax that any city may adopt if the county has not yet done so. The Washington State legislature updated this tax through House Bill 1590 in 2020 to allow councilmanic adoption. The City of Bellevue adopted

this tax by Resolution 9826.¹⁵ Following, King County adopted the Housing & Related Services Sales Tax. For both jurisdictions, the tax became effective January 1, 2021.

Use of funds: A minimum of 60% of revenues collected must be allocated towards the following purposes as defined by RCW 82.14.530 (2)(a):

- Developing or acquiring affordable housing.
- Developing or acquiring facilities providing housing-related services.
- Funding the operations and maintenance costs of newly constructed affordable housing or facilities where housing-related programs are provided.

The use of funds is also restricted to specific populations with incomes at or below 60% AMI. This includes, as defined by RCW 82.14.530 (2)(b):

- People with disabilities
- People with behavioral health disabilities
- People who are homeless or at risk of becoming homeless
- Unaccompanied homeless youth or young adults
- Veterans
- Senior citizens
- Domestic violence survivors

The remaining, up to 40%, of funds must be used for the operation and delivery of behavioral health treatment and housing-related programs, as defined by RCW 82.14.530 (2)(c). Additionally, only 10% of the revenues collected may be used as an alternative to existing local funding for the allowed use of funds (RCW 82.14.530 (6)(b)).

City of Bellevue Revenues: Funding received from the Housing and Related Services Sales Tax is administered through the City of Bellevue's Behavioral Health and Housing Related Services Housing Stability Program.

¹⁵ Resolution 9826: [https://bellevuewa.gov/city-government/departments/parks/community-services/human-services/behavioral-health-housing-related-services-housing-stability-program#:~:text=Through%20the%20Housing%20Stability%20\(formerly,Bellevue%20to%20collect%20the%20tax.](https://bellevuewa.gov/city-government/departments/parks/community-services/human-services/behavioral-health-housing-related-services-housing-stability-program#:~:text=Through%20the%20Housing%20Stability%20(formerly,Bellevue%20to%20collect%20the%20tax.)
MRSC: <https://mrsc.org/explore-topics/planning/housing/affordable-housing-funding-sources>

The City of Bellevue’s 2023-2024 budget identified \$19.8 million to be used for the development of affordable housing.¹⁶ To date, the City of Bellevue has raised more than \$26 million¹⁷ in tax revenue from Housing & Related Services Sales Tax, including nearly \$21 million¹⁸ between 2021 and 2022.

Priorities for the Housing Stability Program (HSP) set by the City Council:

- Provide housing for household earning below 30% AMI;
- Address and prevent homelessness and housing instability; and
- Focus on underserved, vulnerable residents in Bellevue.¹⁹

Each year the HSP issues a request for proposals (RFP) to allocate available funding to projects that serve to advance program priorities. The program creates a process by which housing projects can apply for funding and encourages projects to partner with other providers and seek funding from other sources. The 2023 program advertised \$10.4 million in funding and allows eligible projects to request up to \$13,112.50 per unit per year for operations and maintenance. The City of Bellevue has partnered with ARCH to administer the process. Applications for 2023 funding were due to ARCH by September 15, 2023, and recommendations are expected to be reviewed by City Council in the first quarter of 2024.²⁰

HB 1406 Affordable and Supportive Housing Sales Tax

Substitute House Bill 1406, called the Affordable and Supportive Housing Sales Tax bill, was enacted in July 2019 and allowed jurisdictions to adopt the measure by July 28, 2020²¹. This bill gave jurisdictions the authorization to implement a 0.0073% or 0.0146% local sales tax, which would be credited against the state’s portion of the sales and use tax, to fund affordable or supportive housing.

16 City of Bellevue 2023-24 Adopted Budget 2023-29 Capital Investment Program, page 81.

17 City of Bellevue Housing Fund Revenue, 2013-2023.

18 City of Bellevue Housing Fund Revenue, 2013-2023.

19 <https://bellevuewa.gov/city-government/departments/community-development/housing/housing-stability-program>

20 <https://bellevuewa.gov/city-government/departments/community-development/housing/housing-stability-program>

21 Substitute House Bill 1406 – Affordable and Supportive Housing – Local Sales and Use Tax. July, 2019.

Counties²² and cities meeting selected criteria²³ adopting the tax credit will receive 0.0146% of taxable retail sales for 20 years. The City of Bellevue adopted a 0.0073% retail sales and use tax, credited against the state's portion of the sales and use tax through Ordinance 6486 effective November of 2019.²⁴ A maximum amount is calculated for each city and county based on the adopted rate multiplied by the fiscal year's taxable retail sales for the jurisdiction. If a jurisdiction exceeds that maximum, distributions cease until the next fiscal year, and the jurisdiction must remit any excess distributions to the State.

Use of Funds: Revenues collected through HB 1406 may only be used for the following purposes, according to RCW 82.14.540²⁵:

- Acquiring, rehabilitating, or constructing affordable housing, which may include new units of affordable housing within an existing structure or facilities providing supportive housing services under RCW 71.24.385;
- Funding the operations and maintenance costs of new units of affordable or supportive housing; or
- For providing rental assistance to tenants.

The funds must be used to serve households with an income of 60% AMI or less. Additionally, the administrative costs may not exceed 10% of the annual distribution. Jurisdictions adopting this tax may also use it to repay general obligation or revenue bonds issued for uses meeting the above requirements.

City of Bellevue Revenues: The current fund balance in the City of Bellevue is around \$1 million. More than \$2.4 million in tax revenues have been collected since 2020, averaging more than \$600,000 annually.²⁶

Affordable Housing Contingency Capital Investment Program (CIP) Fund

²² Counties receive 0.0146% minus the credits received by participating cities.

²³ Cities with a qualifying local tax prior to July 28, 2020 receive 0.0146% of local taxable retail sales. According to the Municipal Research and Services Center, a qualifying local taxes include an affordable housing sales tax as defined by RCW 82.14.530, an affordable housing levy (RCW 84.52.105), a levy lid lift restricted to affordable housing, or a mental health and chemical dependency sales tax (RCW 82.14.460).

²⁴ City of Bellevue, Ordinance [6486](#).

²⁵ RCW 82.14.540.

²⁶ City of Bellevue Housing Fund Revenue. 2013-2023.

The City of Bellevue allocates \$2 million annually from its Capital Investment Program budget into its Affordable Housing Contingency Fund and sets aside the funds to be exclusively used for the preservation and development of affordable housing.²⁷

Use of funds: Priorities for use of these revenues are based on City Council direction, with the purpose of providing funding beyond current levels to support affordable housing especially for households earning less than 60% of AMI.

City of Bellevue Revenues: Overall, the City of Bellevue has \$23 million in programmed expenditures, of which \$9 million has been appropriated to-date.²⁸

BelRed In-Lieu Fees

Development projects in BelRed can exceed the base Floor Area Ratio (FAR) if they meet certain criteria depending on the project amenity. If developers choose not to meet the specified criteria, they can pay an in-lieu fee to achieve the desired excess FAR. The in-lieu fee charge for Tier 1 residential projects is \$26.85 per-square-foot of bonus area, and \$22.38 for nonresidential and Tier 2 developments per-square-foot of bonus building area.²⁹

The FAR Amenity Incentive System and in-lieu fee are separate from the MFTE program, although units may be counted in tandem for MFTE if units are provided at deeper levels of affordability.

Use of Funds: According to the City of Bellevue Land Use Code 20.25D.090(C)(5), collected in-lieu fees must be used to develop the amenity for which they were paid. In addition to affordable housing, other amenities developers may provide or pay in-lieu fees for include park dedication; trail dedications and easements; stream restoration; regional transfer of development rights; childcare or non-profit space; public restrooms; public art; public access to outdoor plaza; LEED Gold or Platinum certification; active recreation area; and natural drainage practices.

²⁷ City of Bellevue 2023-24 Adopted Budget 2023-29 Capital Investment Program Plan. Page 348.

²⁸ City of Bellevue 2023-24 Adopted Budget 2023-29 Capital Investment Program Plan. page 461-464. Page 476.

²⁹ City of Bellevue Bel-Red FAR Amenity Standards; Fee-in-Lieu 2023 Adjusted Rate Per SF Bonus Area, 2023.

City of Bellevue Revenues: Between 2013 and 2023, the City of Bellevue raised approximately \$11.7 million³⁰ in revenues through the collection of housing in-lieu fees. A portion of these in-lieu fees were recently used to support a project focused on preservation of affordable units.

Multi-Family Tax Exemption (MFTE)

The City of Bellevue offers Multi-Family Tax Exemptions up to a maximum of 12 years for developments that meet specific requirements.³¹

City of Bellevue Revenues: The MFTE program does not generate revenue for the City of Bellevue. Rather, the City of Bellevue supports multifamily and affordable housing development by granting a property tax exemption on eligible multifamily housing in exchange for income- and rent-restricted units.

A 2019 report by the Washington State Joint Legislative Audit and Review Committee (JLARC) estimated beneficiary savings per unit. Data specific to Bellevue was unavailable. Statewide beneficiaries save nearly \$2,100 per market rate unit, within developments with all market rate units, and nearly \$10,700 per affordable unit. The report found that the value of benefits varied significantly depending on the location, primarily driven by the number of affordable units.³²

ARCH Housing Trust Fund

ARCH invests funding received from member jurisdictions into the construction and preservation of affordable housing through the Housing Trust Fund. Funds are allocated annually through a competitive process. The City of Bellevue, like other Eastside cities, contributes annually to ARCH, including \$100,000 in retail sales and use taxes. ARCH also administers the Bellevue Housing Stability Fund, which is funded by the City of Bellevue's Housing and Related Services Tax revenues.

Use of funds: ARCH sets funding priorities and target populations for each round of funding. In 2023, the priorities include:

³¹https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/MFTE_factsheet_Bellevue.pdf

³² https://leg.wa.gov/jlarc/taxReports/2019/MFTE/f_ii/print.pdf

- Target population, specifically family, senior, homeless, and special needs.;
- Leveraging private investments;
- Transit-oriented development;
- Shelter and supportive housing;
- Preservation;
- Geographic equity;
- Racial equity;
- Cost effective development approaches;
- Timely delivery of housing; and
- Innovative and sustainable and environmentally friendly solutions.

Applicants eligible for funding include non-profit or private for-profit organizations, public housing authorities, public development authorities, and local governments. Projects funded by the Housing Trust Fund must create housing for households at or below 50% AMI. There are exceptions to the income limits for projects that leverage other funding sources that allow units serving households at or below 80% AMI.

Funding may be used for acquisition and related costs; architecture, engineering and design; rehabilitation or construction costs; site development; utility service costs; and short-term direct tenant assistance focusing on homelessness prevention.³³

City of Bellevue Revenues: Historically, the City of Bellevue contributed 31% of ARCH funding and 31% of ARCH funded units have been developed in Bellevue³⁴. In 2022, 34% of ARCH funding came from the City of Bellevue. City of Bellevue funds contributed to the ARCH Housing Trust Fund come from the City’s General Fund, HB 1406 Affordable Housing Sales Tax Credit, and loan repayments.

In January of 2023, ARCH recommended two projects in Bellevue receive funding, Bellevue Homes by Habitat for Humanity and Spring District 120th Avenue Transit Oriented Development by BRIDGE.

³³https://static1.squarespace.com/static/61687c3f7fbc096461d80234/t/64d13e17d13cc95addeecb02/1691434520286/1_2023+ARCH+Housing+Trust+Fund+Guidelines+Final.pdf

³⁴https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/AH%20Bellevue%20funded%20ARCH%20projects%202014-2021.pdf

Together, these two projects will provide 265 affordable units and were recommended to receive \$950,000 in funding.³⁵

Between 2017 and 2021 ARCH provided funding to seven projects in Bellevue:

- 30 Bellevue by Imagine Housing: \$356,084 (2017)
- Men’s Home by Congregations for the Homeless: \$60,567 (2017)
- Men’s Shelter by Congregations for the Homeless: \$228,920 (2020)
- Eastgate Apartments by Inland Group Polaris: \$263,930 (2020)
- Eastgate Permanent Supportive Housing by Plymouth: \$62,200 (2021)
- Bellevue Homes by Habitat for Humanity: \$203,600 (2021)
- Spring District 120th Avenue Transit Oriented Development by BRIDGE: \$118,700 (2021)³⁶

Other Revenue Sources Used in the City of Bellevue

King County Transit-Oriented Development (TOD) Eastside Fund

[RCW 67.28.180](#) authorizes King County the authority to bond against 37.5% of the County’s post-2021 hotel and motel tax revenue, in order to develop affordable housing near public transit.³⁷ Called the Transit-Oriented Development Bond Allocation Plan³⁸, these funds are set aside exclusively for developments that will offer income-restricted units at or below 80% of the AMI, and will be located within one-half mile of a transit station. These funds may also be used to repay general obligations or revenue bonds to finance such developments, as well as revenue bonds to promote sustainable workplace opportunities near tourism impacted communities. The county may use the funds for “contracts, loans, or grants to non-profit organizations or public housing authorities.”

Use of Funds: State law mandates that debt service for revenue bonds pledged against these revenues may not make up more than half of the 37.5%³⁹ of the post-2021 hotel and motel tax revenues allocated for affordable housing. Excluded from this restriction are General

³⁵ ARCH Executive Committee Fall 2022 Housing Trust Fund (HTF) Recommendation.

³⁶ ARCH HTF Expenditures 2017-2022.

³⁷ King County Transit-Oriented Development Bond Allocation Plan. 2016.

³⁸ King County Transit-Oriented Development Bond Allocation Plan. 2016.

³⁹ King County Transit-Oriented Development Bond Allocation Plan, Page 1.

Obligation bonds that could pledge the County’s full faith and credit, as well as pledge the post-2021 tax revenues.

Given that state law also requires that these lodging tax funds are to be used to provide contracts, loans or grants to non-profit organizations or public housing authorities, King County strongly advocates for partnerships between for- and non-profit housing developers to maximize affordable housing output.

The 2016 King County Transit-Oriented Development Bond Allocation Plan documents the priorities, strategies and allocation for this funding source. Principles guiding funding decisions include:

- Funding will be “fairly and equitable distributed” across the county.
- Prioritize investments in high-capacity transit areas.
- Investments should meet the county’s principles for diversity, including racial, ethnic and economic diversity.
- Investments should be integrated with other initiatives and strategies.
- Investments should target goal to meet housing needs “as quickly as reasonably possible”.
- Prioritize investments that serve populations with the greatest need including families, veterans, survivors of domestic violence, people with disabilities, persons at risk of homelessness and persons reentering the community after incarceration.
- Encourage projects that “leverage other funding sources”.

Projects are awarded through an annual Request for Proposals (RFP) process.

City of Bellevue Revenues: King County’s 2016 strategy outlines high-level priorities for investment of \$87 million over five years. This strategy outlined six key project types:

- All-County Agency Proposed Projects: \$32.3 Million
- I-90 Corridor (Issaquah to North Bend) Affordable Housing Projects: \$10 Million
- Northgate Affordable Housing: \$10 Million
- South King County Targeted RFP: \$10 Million
- Bel-Red Targeted RFP: \$10 Million
- Seattle South Downtown Projects: \$14.7 Million

After the first five years, starting in 2021, the strategy indicates that any lodging tax not allocated to debt service will be used for annual funding awards. The amount estimated in 2016 for debt service after 2021 is estimated at \$7 million per year.

King County manages the TOD funding through the Housing Finance Program (HFP). Annual reports document each project, the amount of funding and the source(s) of funding each year between 2016 and 2021. Projects in Bellevue receiving TOD funding between 2016 and 2021 include:

- Highland Village by King County Housing Authority: 76 units receiving a \$3.5 million award (2016).
- Polaris at Eastgate by Horizon Housing Alliance: 354 units receiving a \$8 million award (2020).

In 2020 King County also released an RFP for Sound Transit Spring District Station Transit Oriented Development. Results of this RFP are not available in King County's documentation. In February of 2023, King County announced a total of \$24.67 million in funding awards to eight projects through the Housing Finance Program, among these was BRIDGE Housing's Spring District project anticipated to provide 235 units located at Sound Transit's Spring District site⁴⁰.

Community Development Block Grants (CDBG)

The U.S. Department of Housing and Urban Development (HUD) distributes grant funding annually to states and local governments to address housing and community development needs. HUD uses a formula to distribute these funds to states and large urban cities and counties. This funding is not available to small cities and counties, non-profit organizations, or public housing authorities. The City of Bellevue receives CDBG funding annually.

Use of Funds: The City of Bellevue's Consolidated Housing and Community Development Plan serves as the City of Bellevue's application for CDBG funding and guides the use of CDBG funding received. This plan covers a five-year period and has annual action plans that are updated each year. HUD reviews and approves annual action plans before releasing allocated CDBG funds to each jurisdiction.

The Code of Federal Regulations Part 570 documents uses eligible for CDBG funding. These generally include community facilities and infrastructure; housing rehabilitation and infrastructure; economic development and small business assistance; planning; and public services. All funding must primarily support projects benefiting persons at or below 80% of AMI.

⁴⁰<https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2023/february/02-hfp-awards>

The City of Bellevue’s 2020-2024 Community Development Block Grant Consolidated Plan for Housing & Community Development⁴¹ identifies annual goals and objectives including:

- Enhance Community and Economic Development
- Preserve and Improve Access to Affordable Housing
- Provide Shelter and Services for Homeless

These goals guide project selection, also documented in the plan. The City of Bellevue’s plan documents seven projects, including population(s) served, allocated CDBG funding, other sources of funding, and a project description. The following projects are explicitly mentioned in the plan:

- King County Housing Authority Major Home Repair Program;
- King County Housing Authority Major Home Repair Admin;
- Sound Generations Minor Home Repair;
- Jewish Family Service Refugee & Immigrant Services;
- CDBG Administration;
- CDBG Planning; and
- Ventures Microenterprise Assistance.

City of Bellevue Revenues: The amount of funding received each year depends on the congressional appropriation for HUD annually. HUD then uses a formula to distribute the appropriation between HUD’s programs and grant recipients. The formula allocating funding across jurisdictions considers factors such as population, people in poverty, population growth, and more.⁴²

Between 2003 and 2022, the City of Bellevue has received more than \$15.9 million in CDBG funding, including Coronavirus Aid, Relief, and Economic Security Act (CARES) Act grants.⁴³ The 2022 Consolidated Annual Performance and Evaluation Report (CAPER) published by the City of Bellevue documents a total of nearly \$1.2 million in CDBG funds

⁴¹ City of Bellevue 2020-2024 Community Development Block Grant Consolidated Plan for Housing & Community Development.

⁴² <https://www.hudexchange.info/sites/onecpd/assets/File/CDBG-Formula-Appropriation-Process-Transcript.pdf>

⁴³ <https://www.hudexchange.info/grantees/allocations-awards/?params=%7B%22limit%22%3A20%2C%22COC%22%3Afalse%2C%22sort%22%3A%22%22%2C%22min%22%3A%22%22%2C%22years%22%3A%5B%5D%2C%22dir%22%3A%22%22%2C%22multiStateAwards%22%3A0%2C%22grantees%22%3A%5B%7B%22id%22%3A%22155%22%7D%5D%2C%22state%22%3A%22WA%22%2C%22orgid%22%3A%22%22%2C%22orgname%22%3A%22%22%2C%22programs%22%3A%5B%2%5D%2C%22max%22%3A%22%22%7D##granteeSearch>

available in 2022, including \$807,700 in CDBG grant funding and nearly \$355,100 in program income. The City of Bellevue also allocated more than \$4.7 million in general fund revenues to support CDBG funded projects and programs.⁴⁴ The 2021 CAPER reports \$1.3 million in available CDBG funds, including unspent funds from 2019 and 2020, and program income.

CDBG funds in 2022, as documented in the CAPER, were used for a variety of programs and activities with the goal to preserve and improve access to affordable housing. None of these activities in 2022 created new affordable housing units. Specific projects and program activities include:

- Life safety repairs through the King County Housing Authority Major Home Repair program
- Minor home repairs through the Sound Generations Minor Home Repair program
- Congregations for the Homeless Behavioral Health Program
- Congregations for the Homeless Food Assistance Program
- Hopelink Rental Assistance Program
- YMCA of Greater Seattle Food Box Delivery Program
- YMCA of Greater Seattle Rental Assistance Program
- India Association of Western Washington Behavior Health Program
- India Association of Western Washington Rental Assistance Program

HOME Investment Partnerships Program

The Home Investment Partnerships Program (HOME) is similar to CDBG funding, but HOME grants can solely be used to preserve and develop affordable housing. Like CDBG, HOME is a program administered by HUD and is allocated to jurisdictions based on a formula. The City of Bellevue participates in the King County Consortium, a group of contiguous local governments that utilize the consortium to directly participate in the program that they would not individually qualify for. Some cities participating in the Consortium participate for both CDBG and HOME funds, while four jurisdictions including the City of Bellevue participate for HOME funds only.

Use of Funds: HOME funds are designed to be used for the construction, acquisition, and rehabilitation of for-rent and ownership affordable housing. The funds can also be used to provide rental

⁴⁴ https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/HS-2022-CAPER-Bellevue-Final.pdf

assistance for low-income households. Participating jurisdictions are required to contribute a match of at least 25 cents per dollar of HOME funds.

The King County Consortium, which serves as the lead entity for both HOME and CDBG grants for participating cities, is overseen by the Joint Recommendations Committee (JRC).⁴⁵ The JRC is codified in King County Code, Title 24, Chapter 24.13.⁴⁶ The JRC provides guidance and funding recommendations for HOME investments. King County Consortium prepares a Consolidated Housing and Community Development Plan, just like the City of Bellevue, which guides CDBG and HOME investment strategies and priorities, and serves as the application for HUD grant funding. The goals of the plan include:

- Ensure equitable access to affordable housing in the region.
- “Make homelessness, rare, brief and one-time and eliminate racial disparities.”
- Support healthy communities through improving the well-being and mobility of low- and moderate-income households with a focus on communities with historic disparities.

City of Bellevue Funding: Since 1992 the King County Consortium has received more than \$92.9 million in HOME funding.⁴⁷ This funding has supported 2,180 rental units, 254 ownership units and 787 owner rehab units between 1992 and 2019 throughout King County. During this time, the average HOME costs per rental unit in King County was nearly \$28,800, for ownership units the average cost per unit was \$26,500 and for ownership rehab units it was \$16,500.⁴⁸

Since 2011, the King County Consortium has supported five projects in the City of Bellevue through HOME funding. Among these five projects, three were rental projects and two were ownership projects. These projects were allocated nearly \$8.2 million in funding. Recipients of these funds include the Low Income Housing Institute, King County, and Red Vines 1. On average, projects took four years from the date of funding commitment to project completion. One of the five projects is

⁴⁵ <https://kingcounty.gov/en/legacy/depts/community-human-services/housing/consortium>

⁴⁶ <https://apps.leg.wa.gov/rcw/default.aspx?cite=84.52.105>

⁴⁷ https://www.hudexchange.info/programs/home/home-performance-snapshot-and-pj-rankings-reports/?&filter_scopetypeeach=&filter_dateyeareach=2019-09-30&filter_state=&filter_grantee=¤t_page=6

⁴⁸ https://www.hudexchange.info/programs/home/home-performance-snapshot-and-pj-rankings-reports/?&filter_scopetypeeach=&filter_dateyeareach=2019-09-30&filter_state=&filter_grantee=¤t_page=6

not yet completed, receiving funding in 2021, with expected completion in 2025. Overall, these five projects support 62 units, of which two are ownership units.⁴⁹

Washington State Housing Trust Fund

Administered by Commerce, the Housing Trust Fund (HTF) provides municipalities with loans or grants to develop affordable housing projects. Grants and loans are allocated during annual competitive application cycles. In addition to funds appropriated by Washington State, HUD allocates at least \$3 million⁵⁰ in national HTF funding to each state every year. Allocations are determined based on a formula. In 2023, Washington received nearly \$8.4 million in national HTF funding, which are distributed by the state HTF.

The maximum award per development project is \$5 million⁵¹, which includes shelter projects and scatter-site rental developments. The maximum award per homeownership project is \$1.5 million.⁵² Applicants can receive no more than \$5 million in HTF award funding per year, and \$10 million per biennium for multifamily projects, while homeowners can receive no more than \$1.5 million per year and \$3 million per biennium.

Once awarded, recipients receive funding in the form of amortized loans, deferred loans, or recoverable grants. The typical term of an HTF award is 40 years.⁵³

Use of funds: Recipients for HTF funding are limited to the following:⁵⁴

- Local government;
- Local housing authority;

⁴⁹ https://www.hudexchange.info/programs/home/home-activities-reports/?filter_DateYearEach=2023-08-31&filter_State=WA&program=HOME&group=Act

⁵⁰ https://www.hud.gov/press/press_releases_media_advisories/hud_no_23_089

⁵¹ <https://deptofcommerce.app.box.com/s/f89ytc0qtime7dl6wpqke5h2zl1jwzlm>

⁵² <https://deptofcommerce.app.box.com/s/f89ytc0qtime7dl6wpqke5h2zl1jwzlm>

⁵³ <https://deptofcommerce.app.box.com/s/f89ytc0qtime7dl6wpqke5h2zl1jwzlm>.
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⁵⁴ <https://deptofcommerce.app.box.com/s/f89ytc0qtime7dl6wpqke5h2zl1jwzlm>

- Behavioral health administrative services organization;
- Non-profit community or neighborhood-based organization;
- Federally recognized Indian tribes; and
- Regional or statewide non-profit housing assistance organization.

Eligible activities to receive funding from HTF include the following:⁵⁵

- Construction, rehabilitation or acquisition of low and very low-income housing units;
- Rent subsidies;
- Matching funds for social services directly related to providing housing for special-need tenants in assisted projects;
- Technical assistance, design and finance services and consultation, and administrative costs for eligible non-profit community or neighborhood-based organizations;
- Administrative costs for housing assistance groups or organizations when such grant or loan will substantially increase the recipient's access to housing funds other than those available under this chapter;
- Shelters and related services for the homeless, including emergency shelters and overnight youth shelters;
- Mortgage subsidies, including temporary rental and mortgage payment subsidies to prevent homelessness;
- Mortgage insurance guarantee or payments for eligible projects
- Down payment or closing cost assistance for eligible first-time home buyers;
- Acquisition of housing units for the purpose of preservation as low-income or very low-income housing;
- Projects making housing more accessible to families with members who have disabilities; and
- Remodeling and improvements as required to meet building code, licensing requirements, or legal operations to residential properties owned and operated by an entity eligible under RCS 43.185A.040, which were transferred as described in RCW 82.45.010(3)(t) by the parent of a child with developmental disabilities.

City of Bellevue Funding: In the 2021-2023 biennium, two Bellevue projects received Washington HTF awards. These two projects include HSH Apartments and Illahee Affordable Housing. Illahee Affordable housing was also funded in part through Amazon's Housing Equity

Fund, which provided low-interest loans and grants to the King County Housing Authority. HTF awards are funding 61 units. Total development costs for these two projects are estimated at \$17.4 million, and the total award for the two projects was more than \$3.9 million. One project received traditional HTF funding while the second received a direct appropriation, which did not require a competitive bidding process.⁵⁶ Commerce also awarded two gap funding awards in 2021 to projects in Bellevue totaling \$1.7 million for Eastgate Permanent Supportive Housing project and Eastgate Shelter.

Connecting Housing to Infrastructure Program (CHIP)

Initially funded in 2021 by the Washington State Legislature and overseen by Commerce, the Connecting Housing to Infrastructure Program received an additional \$55 million⁵⁷ for the 2023-25 funding. Through the CHIP grant program, cities, counties, or public utility districts can apply for funding that is intended to help cover upfront and infrastructure costs associated with developing affordable housing.

Uses of funds: Fund are allowed to be put towards the following:⁵⁸

- Onsite water, sewer, and stormwater improvements;
- Offsite water, sewer, and stormwater improvements in the right-of-way, connecting to the development; and
- Waived system development charges for the project.

In order to be awarded these funds, the city or county must have adopted a sales and use tax for affordable housing, the development must be comprised of at least 25% affordable units at 80% or less of AMI, and construction must commence within two years of receiving the CHIP grant funding⁵⁹.

City of Bellevue Funding: To date, nearly \$41 million has been awarded to municipalities across Washington State. Two projects within the City of Bellevue have received funding, with funding totaling more than \$3.6 million. Awarded funds supported the development of

⁵⁶ Washington State Department of Commerce Consolidated 2021-23 Biennial Awards and Units Summary

⁵⁷ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/chip/>

⁵⁸ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/chip/>

⁵⁹ <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/chip/>

the Eastgate Permanent Supportive Housing and Polaris at Eastgate developments. These two developments created 455 affordable units.⁶⁰

Low-Income Housing Tax Credits (LIHTC) and Bond Programs

Affordable housing developers can apply for Federal Low-Income Housing Tax Credits to finance both the redevelopment and construction of affordable housing projects. This program is administered by the Washington State Housing Finance Commission (WSHFC). The annual number of credits is calculated by the Internal Revenue Service (IRS) on a per capital basis.⁶¹

Developers can access these credits through two programs, the 4% Bond/Tax Credit program and the 9% tax credit program. Projects must apply for the 9% tax credit through a competitive process. This credit funds new construction and rehabilitations without the supplementation of federal subsidies.⁶² The 4% Bond/Tax Credit program subsidizes 30% of units at a LIHTC development by covering the cost of new construction using additional subsidies or the acquisition cost of existing buildings.⁶³ Projects meeting certain criteria may forgo the competitive process for the 4% program. While the federal government limits the number of credits available through its 9% LIHTC program, there is no federal cap on credits awarded through the 4% program if more than half of a project is financed by bonds issued by the WSHFC.

In 2023, WSHFC was given authority for more than \$21.4 million in tax credits. The Plymouth Housing Group received a \$2.1 million LIHTC in 2021 for the Eastgate Permanent Supportive Housing, supporting 92 low-income units, including 69 units for homeless populations.⁶⁴

In 2023, WSHFC received applications for \$561.1 million in tax-exempt bonds and allocated \$249.3 million. In 2021, during the first-round of allocations Polaris at Eastgate by the Inland Group and Horizon

⁶⁰ CHIP Awards Grantee. June 26, 2023.

<https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/planning-for-housing/chip/>

⁶¹ <https://mrsc.org/explore-topics/planning/housing/affordable-housing-funding-sources#sales>

⁶² <https://www.wshfc.org/mhcf/9percent/index.htm>

⁶³ <https://www.wshfc.org/mhcf/4percent/index.htm>

⁶⁴ <https://www.wshfc.org/mhcf/9percent/lists.htm>

Housing Alliance were awarded \$65 million in tax-exempt bonds, supporting 360 units.⁶⁵

There are currently 18 projects in Bellevue that were financed in part using 9% tax credits, with 1,650 income-restricted units currently in service.⁶⁶

Corporate Partnerships, Commitments and Donations

Two of King County's largest employers have pledged to contribute funding toward affordable housing. These funding sources provide additional options for local governments and non-profit organizations to fund affordable housing.

In January 2021, Amazon launched the **Amazon Housing Equity Fund**, an over \$2 billion⁶⁷ commitment to develop and preserve more than 20,000 affordable homes throughout Washington, Virginia, and Tennessee. Amazon has outlined a multipronged approach to reaching their goal:

- Using low-rate loans and capital grants to preserve and create thousands of affordable homes for the long term.
- Providing opportunities for emerging affordable housing developer companies led by people of color in real estate so they can grow professionally and have easier access to capital.
- Providing grants to support community-based organizations, mission-driven housing providers, traditional and nontraditional public agencies, and organizations led by people of color.
- Advocating for innovative and equity-based policy initiatives.
- Partnering with local governments and agencies on innovative ways to increase affordable housing options.
- Using quick strike funding for preservation of naturally occurring affordable housing buildings.⁶⁸

The following information outlines where Amazon's funding has been placed to date within Bellevue as of August 2023:

- King County Housing Authority: \$24 million for 1,084 affordable units; and

⁶⁵ <https://www.wshfc.org/mhcf/4percent/2021BondAllocationList.pdf>

⁶⁶ Active WSHFC Multifamily Rental Properties.

<https://www.wshfc.org/mhcf/9percent/other.htm>

⁶⁷ <https://www.aboutamazon.com/news/job-creation-and-investment/amazons-commitment-to-bellevue-and-the-eastside>

⁶⁸ <https://www.amazonhousingequity.com/what-is-the-fund>

- Sound Transit Spring District in partnership with BRIDGE Housing: \$3.75 million grant and \$22.1 million loan for 233 affordable units.⁶⁹

Amazon also funded a \$250,000 grant⁷⁰ to the Bellevue School District to develop a plan to help teachers afford housing.

In July 2019, Microsoft made a \$500 million commitment towards affordable housing development and related solutions throughout the Puget Sound Region, called the **Microsoft Affordable Housing Initiative**. This includes separate investments of \$225 million⁷¹ at below market-rate returns, and \$250 million⁷² at market-rate returns, to construct and preserve affordable and middle-income housing in Bellevue, Kirkland, Redmond, Issaquah, Renton, and Sammamish. An additional \$25 million⁷³ was promised in the form of philanthropic grants to address homelessness in the region.

Microsoft promised an additional \$200 million⁷⁴ appropriation to Washington’s Housing Trust fund, as well as supporting condominium liability reforms, extending MFTE , and new incentives for local municipalities to put more efficient land use policies into action.

As of January 2022, Microsoft announced they were allocating an additional \$50 million to the Expanded Land Acquisition Program with the WSHFC. Of the \$750 million Microsoft has pledged to date, Microsoft has overseen and facilitated the disbursement of \$583 million towards initiatives, funds and developments, including the development and preservation of around 730 units⁷⁵ in Bellevue. In addition to the allocation of funds by Microsoft to facilitate the construction of the Eastgate Men’s Shelter, Microsoft funds have supported numerous programs and initiatives aimed at developing affordable units in Bellevue, including King County Housing Authority, Plymouth

⁶⁹ <https://www.amazonhousingequity.com/what-is-the-fund/our-projects>

⁷⁰ <https://www.aboutamazon.com/news/job-creation-and-investment/amazons-commitment-to-bellevue-and-the-eastside>

⁷¹ <https://blogs.microsoft.com/on-the-issues/2019/01/16/ensuring-a-healthy-community-the-need-for-affordable-housing/>

⁷² <https://blogs.microsoft.com/on-the-issues/2019/01/16/ensuring-a-healthy-community-the-need-for-affordable-housing/>

⁷³ <https://blogs.microsoft.com/on-the-issues/2019/01/16/ensuring-a-healthy-community-the-need-for-affordable-housing/>

⁷⁴ <https://blogs.microsoft.com/on-the-issues/2019/01/16/ensuring-a-healthy-community-the-need-for-affordable-housing/>

⁷⁵ <https://blogs.microsoft.com/on-the-issues/2022/01/20/affordable-housing-initiative-washington-state-2022/>

Housing, Stream – Urban Housing Ventures I, and WSHFC Expanded Land Acquisition Program.⁷⁶

Other Revenue Sources Available

Additional revenues sources which the City of Bellevue does not currently leverage include the following. Additional details are documented in Appendix C.

- **Affordable Housing Property Tax Levy.** Authorized by [RCW 84.52.105](#), cities and counties in Washington may levy an additional property tax levy to support affordable housing. This levy may not exceed \$0.50 per \$1,000 of assessed value for up to ten years. This levy requires approval by a majority of voters within the taxing district.
- **Real Estate Excise Taxes.** In May 2021, the Washington State Legislature adopted updates to [RCW 82.46.035](#) to allow a portion of the second 0.25% of the real estate excise tax, also known as REET 2 to support affordable housing. Cities may use \$100,000 or 25% of available funds up to \$1 million dollars to support affordable housing through January 1, 2026.
- **Consolidated Homeless Grant (CHG).** Commerce provides funds and resources to local governments and non-profits throughout Washington to combat homelessness through the CHG program.⁷⁷ This program is funded by the state General Fund and document recording fees. The CHG is comprised of four different grant programs: CHG Standard, Permanent Supportive Housing for Chronically Homeless Families, Eviction Prevention, and Housing and Essential Needs.⁷⁸
- **Community Revitalization Financing (CRF).** In 2020, the Washington State Legislature updated RCW 39.89 to allow the use of tax increment financing to construct or preserve permanently affordable housing. CRF allows cities and counties to establish tax increment areas, where a portion of the regular property tax levy is used to fund the costs of public improvements.⁷⁹
- **Land Acquisition Program (LAP).** WSHFC's program assists eligible organizations in Washington to purchase land and improved real property for the later development of affordable

⁷⁶ <https://news.microsoft.com/affordable-housing/>

⁷⁷ <https://www.commerce.wa.gov/serving-communities/homelessness/consolidated-homeless-grant/>

⁷⁸ <https://deptofcommerce.app.box.com/s/4d1lilui45uqljmhlseufez4flxqv1q6b>

⁷⁹ Washington State Department of Commerce Guidance to Address Racially Disparate Impacts, April 2023. Page 110.

housing.⁸⁰ This program offers local governments, local housing authorities, nonprofit community or neighborhood-based organizations, federally recognized Indian tribes in the state of Washington, and regional or statewide nonprofit housing assistance organizations the ability to leverage favorable interest rates to purchase the land, allowing them adequate time to secure financing for the construction of the project.

- **HUD Continuum of Care (COC) Program.** HUD’s Continuum of Care (CoC) Program provides funding to non-profit providers, as well as state and local governments, to assist in the rehousing of adults and families with children who are experiencing or at risk of homelessness.⁸¹ HUD awards funding grants to each state, which are then allocated to local governments, jurisdictions, and housing authorities.

A range of additional programs are available to local governments, low-income households and housing seekers, and housing developers in Washington State. These programs are documented in Appendix C.

⁸⁰ <https://wshfc.org/mhcf/lap/LAPProgramDescApplication2020.pdf>

⁸¹ <https://www.commerce.wa.gov/serving-communities/homelessness/continuum-of-care/>

APPENDIX A: OTHER WASHINGTON STATE AFFORDABLE HOUSING LAWS OF 2023

Type	Law	Description/Requirements
New tools for affordable housing	SB 1236	Amends RCW 35.92 and expands the authorization for utility charge delays or waivers on the behalf of a non-profit organization, public development authority, housing authority or local agency that provides emergency shelter, transitional housing, permanent supportive housing or affordable housing. The bill requires connection charges waived under this chapter to be funded using general funds, grant dollars, or other identified revenue stream.
	HB 1695	Amends RCW 39.33.015 and clarifies the definitions of affordable housing that qualify as a “public benefit” to authorize governments and public agencies to sell publicly-owned surplus property at discounted prices for affordable housing development. “Public benefit” means rental housing where the rent and utilities are no more than 30% of a household’s income, or permanently affordable housing where housing costs are 38% of a household’s income.
	SB 5045	Authorized a pilot program in King County to expand the existing property tax exemption for accessory dwelling units for as long as the unit is occupied by a non-family member under 60% AMI or a senior.
REET exemption for affordable housing	ESHB 1643	Amends RCW 82.45.010, exempts real property sold to public entities or non-profits for affordable housing from the Real Estate Excise Tax (REET). The entity must use the property exclusively for low-income housing for at least the next 10 years. A covenant on the property must be recorded to that effect.
"Tiny home communities" added to RCW 36.70A.540	SHB 2001	Amended RCW 36.70A.540 to add “tiny home communities” to the list of housing incentive programs that local governments fully planning under the GMA may use in their development regulations and other means to

Type	Law	Description/Requirements
		expand opportunities for low-income housing units.
"Permanently affordable housing" added to CRF Act	HB 2061	Amended RCW 39.89.020 to add “permanently affordable housing” to the definition of “public improvements” under the Community Revitalization Financing Act (CRF Act). The CRF Act was created in 2001, authorizing cities, towns, counties, and port districts to create a tax increment area and finance public improvements within the area by using increased revenues from local property taxes generated within the area. The legislation clarified that public improvements under the CRF Act may include permanently affordable housing.
Sales and use taxes for affordable housing	E2SSB 5755	Revised Title 82 RCW, authorized a limited deferral of sales and use taxes to encourage amends redevelopment of underdeveloped land for affordable housing in targeted urban areas. Qualifying cities must have a population of at least 135,000 and not more than 250,000 (this includes Spokane, Tacoma, and Vancouver). To use the deferral program, a city must adopt a resolution and follow a public process. Underdeveloped property is land used as a surface vehicle parking lot that is open to the public without charge. An owner of such property may seek a sales and use tax deferral for an investment project that provides affordable housing.

Source: Washington State Department of Commerce, Washington State Housing Laws of 2019 through 2023.

APPENDIX B: MPP HOUSING POLICIES

CPPs act as guides for land use and growth management decisions made at the county and city level. Specific to affordable housing, CPPs help counties and cities to plan for a fair share of affordable housing and must include specific requirements dictated by the GMA. CPPs aim to provide guidelines for coordination between the county and its inlying jurisdictions and to reinforce the need for affordable housing stressed by the GMA. CPPs require that city-level policies remain consistent with broader, countywide planning policies.

For King, Kitsap, Pierce, and Snohomish counties CPPs local policies must also align with multicounty planning policies (MPPs) in Vision 2050.

Multicounty Planning Policies (MPP): PSRC Vision 2050

Vision 2050 includes a housing vision and housing goal and urges regional jurisdictions to implement affordable housing incentives such as inclusionary and incentive zoning.⁸² VISION 2050 housing goal is: "The region preserves, improves and expands its housing stock to provide a range of affordable, accessible, healthy and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people."

The following are housing policies from VISION 2050. All policies below are direct quotes.

MPP-H-1 Plan for housing supply, forms, and densities to meet the region's current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/ housing balance.

MPP-H-2 Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region.

MPP-H-3 Achieve and sustain – through preservation, rehabilitation, and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income, and special needs

⁸² "Establishing Housing Targets for your Community: County-level considerations for housing planning", Washington State Department of Commerce, July 2023.

individuals and households that is equitably and rationally distributed throughout the region.

MPP-H-4 Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration, and jurisdictional action.

MPP-H-5 Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.

MPP-H-6 Develop and provide a range of housing choices for workers at all income levels throughout the region that is accessible to job centers and attainable to workers at anticipated wages.

MPP-H-7 Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region.
VISION 2050 Multicounty Planning Policies.

MPP-H-8 Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations, and incentives.

MPP-H-9 Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.

MPP-H-10 Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility, and minimize additional costs to housing.

MPP-H-11 Encourage interjurisdictional cooperative efforts and public-private partnerships to advance the provision of affordable and special needs housing.

MPP-H-12 Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.

In addition to Vision 2050 policies, there are a range of strategies and policies laid out in the Regional Affordable Housing Task Force's (RAHTF) Five-Year Action Plan that are pertinent to affordable housing. Generally, the strategies and policies closely align with the policies laid out in the policies captured in the King County CPP. The RAHTF does provide unique strategies focusing on urging jurisdictions to be more hands on with affordable housing development through site identification and land acquisition.

APPENDIX C. OTHER REVENUE SOURCES

The following taxes, grants, loans and other funding sources are additional revenue sources not currently used in the City of Bellevue . These sources of revenues as well as other funding sources available to local governments, low-income households and housing seekers, and housing developers are documented in this appendix.

Affordable Housing Property Tax Levy

Since 1993, cities and counties in Washington may levy an additional regular property tax levy to support affordable housing, as documented in [RCW 84.52.105](#). This levy may not exceed \$0.50 per \$1,000 of assessed value for up to ten years. Jurisdictions wishing to impose this levy must be authorized by a majority of voters in the taxing district. They may not impose the tax until the legislative authority of the jurisdiction has declared an emergency related to affordable housing. Jurisdictions must additionally adopt a housing finance plan for affordable housing that complies with state and federal laws.

If both a county and city within the county impose an affordable housing levy, the levy for the last jurisdiction to adopt must be reduced so that the combined rates do not exceed the statutorily allowed \$0.50 per \$1,000 of assessed value. This property tax levy is exempt from the statutory \$5.90 per \$1,000 in assessed valuation aggregate limit on property tax.

Use of Funds: Funds generated by this levy may be used to:

- Finance affordable housing for very low-income households, and affordable homeownership,
- Owner-occupied home repair, and
- Foreclosure prevention programs for low-income households.

The RCW defines very low-income households as those with income at or below 50% AMI and low-income households as those at or below 80% AMI.

Senate Bill 6212, passed in March of 2020, expanded the original law to allow funds generated through the property tax levy to be used for more than affordable housing for very low-income households, as documented above.

Examples: Both the City of Seattle and the City of Vancouver have passed affordable housing levies. The City of Seattle has passed the Seattle Housing levy five times since 1986, and according to the City of Seattle, the funding has exceeded its goals each time.

- **Seattle Housing Levy:** A seven-year levy last passed in 2016. Voters will have the opportunity to renew the levy in November of 2023. The proposed tax rate for the 2023 Housing Levy is \$0.45 per \$1,000 in assessed valuation.⁸³
 - The 2016 levy raised \$290 million.
 - Between 2017 and 2022, the Housing levy has added 2,741 rental units (127% of goal), reinvested in 530 rental units (151% of goal), supported 481 rental units with operations and maintenance funds (94% of goal), assisted 3,854 individuals in families in with homelessness prevention and housing stability services programs (86% of goal), assisted 370 households with homeownership (132% of goal), and supported acquisition and preservation of 1,827 units.⁸⁴
 - The 2023 Housing Levy has the following goals between 2024 and 2030: produce and preserve 3,516 affordable apartments, support operations for 510 new units, stabilize workers supporting 646 existing homes, create 277 homeownership opportunities, stabilize 90 low-income homeowners, and stabilize and prevent 4,500 household from experiencing homelessness.⁸⁵
- **City of Vancouver Affordable Housing Fund (AHF):** The residents of Vancouver approved a \$42 million property tax levy in 2016. This is a \$0.36 per \$1,000 in assessed value property tax.⁸⁶ Vancouver voters renewed this levy for \$100 million between 2023 and 2033.⁸⁷
 - Between 2017 and 2023, the AHF has produced or preserved 1,092 housing units of which 1,017 are affordable units, assisted 1,860 households and supported 450 shelter beds.⁸⁸

⁸³ <https://housing.seattle.gov/seattle-housing-levy-signed/#sthash.1cndSDNi.4V37tyqy.dpbs>

⁸⁴ https://www.seattle.gov/documents/Departments/Housing/Reports/2022_OHLevyReport_Final.pdf

⁸⁵ <https://housing.seattle.gov/seattle-housing-levy-signed/#sthash.1cndSDNi.4V37tyqy.dpbs>

⁸⁶ <https://localhousingsolutions.org/housing-policy-case-studies/vancouver-tax-levy-for-affordable-housing/>

⁸⁷ <https://www.cityofvancouver.us/economic-prosperity-and-housing/affordable-housing-fund/>

⁸⁸ <https://city-of-vancouver-wa-geo-hub-cityofvancouver.hub.arcgis.com/documents/CityOfVancouver::affordable-housing-fund-investment/explore>

Real Estate Excise Taxes

In May of 2021 the Washington State Legislature adopted updates to [RCW 82.46.035](#) to allow a portion of the second 0.25% of the real estate excise tax, also known as REET 2, for the use of affordable housing. Cities may use \$100,000 or 25% of available funds up to \$1 million dollars to support affordable housing through January 1, 2026. Revenues must be deposited in a separate account after December 31, 2023, and the capital projects planned must be documented in the adopted budget. Additionally, counties or cities using these funds for affordable housing must document in their capital facilities plans that it has sufficient funds to support capital investments for “streets, roads, highways, sidewalks, street and road lighting, traffic signals, bridges, domestic water systems, storm and sanitary sewer systems.”⁸⁹

The City of Bellevue has adopted the maximum allowable REET rate of 0.5%, including 0.25% for REET 1 and 0.25% for REET 2. However, the City of Bellevue is not currently using funds for affordable housing, as allowed by the Washington State Legislature. Using these funds for affordable housing is a trade-off for cities that may struggle to identify funding for other capital projects, for which REET is commonly used.

House Bill 1628, which was referred out of committee to rules review as of April 17, would amend state law applicable to real estate excise tax. Proposed changes to the statewide REET include increasing the state rate for transactions over some limits, and allowing state REET funds to be used for selected affordable housing accounts. The bill, as currently written, would allow cities and counties to add an additional 0.25% REET, allow counties to adopt the 0.25% if cities have not adopted it by a certain date, and remove the January 1, 2026, date to allow a portion of REET 2 to support affordable housing.⁹⁰

Use of funds: The portion of REET 2 funds allowed to support affordable housing may be used for the “planning, acquisition, construction, reconstruction, repair, replacement, rehabilitation, or improvement of facilities for those experiencing homelessness and affordable housing projects.”⁹¹

Proposed changes in HB 1628 would allow 50% of funding to be used for capital costs including construction, acquisition and infrastructure for affordable housing and facilities providing housing-related programs.

⁸⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=82.46.035>

⁹⁰ <https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/House%20Bills/1628-S2.pdf?q=20231013174739>

⁹¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=82.46.035>

The remaining 50% may be used for the operations, maintenance and services tied directly to affordable housing. Cities and counties would be allowed to enter into interlocal agreements to accomplish the goals.⁹²

Consolidated Homeless Grant (CHG)

Commerce provides funds and resources to local governments and non-profits throughout Washington to combat homelessness, through the CHG program.⁹³ This program is funded by the state general fund in addition to document recording fees. The CHG is comprised of four different grant programs: CHG Standard, Permanent Supportive Housing for Chronically Homeless Families, Eviction Prevention, and Housing and Essential Needs.⁹⁴

Use of funds: CHG grants are awarded to local governments and non-profits. Each of the four grant programs provides funding for different activities, however all of the programs must provide services to individuals at or below 80% of AMI. Programs and services eligible for CHG funding include:⁹⁵

- Drop-in and continuous stay emergency shelter
- Transitional housing
- Homelessness prevention
- Rapid re-housing
- Permanent supportive housing
- Street outreach

According to the 2022 Homeless Housing Project Expenditure Report the Department of Commerce awarded nearly \$4.7 million in CHG funding, excluding Housing and Essential Needs (HEN). These grants supported more than 2,200 project beds. Available reports do not indicate the location of grantees beyond county. Catholic Community Services of Western Washington (CCSWW) provides services to homeless and low-income people utilizing funds available through the

⁹² <https://lawfilesexternal.wa.gov/biennium/2023-24/Pdf/Bills/House%20Bills/1628-S2.pdf?q=20231013174739>

⁹³ <https://www.commerce.wa.gov/serving-communities/homelessness/consolidated-homeless-grant/>

⁹⁴ <https://deptofcommerce.app.box.com/s/4d1lilui45uqljmhseufez4flxqv1q6b>

⁹⁵ Guidelines for the Consolidated Homeless Grant. Washington State Department of Commerce. Page 7. July 1, 2023.

<https://deptofcommerce.app.box.com/s/4d1lilui45uqljmhseufez4flxqv1q6b>

HEN program. In 2022, the program’s total operating and service expenditure budget was approximately \$24.7 million in King County.⁹⁶

Community Revitalization Financing (CRF)

In 2020, the Washington State Legislature updated RCW 39.89 to allow the use of tax increment financing to construct or preserve permanently affordable housing. CRF allows cities and counties to establish tax increment areas, where a portion of the regular property tax levy is used to fund the costs of public improvements.⁹⁷ The purpose of this funding mechanism is to fund public improvements that will encourage private development within the increment area. The adopting ordinance must specify the public improvements. As of 2020, the tax increment may be used to fund housing restricted to low-income households. Affordability restrictions for rental housing must be in place for 40 years and 25 years for ownership housing units.⁹⁸

Land Acquisition Program (LAP)

Offered by the WSHFC, developers can apply for a LAP loan to assist in the purchasing and preservation of land for the later development of affordable housing.⁹⁹ This program offers non-profit, housing authorities and tribal developers the ability to leverage favorable interest rates to purchase the land, allowing them adequate time to secure financing for the construction of the project. Through traditional LAP loans, developers must restrict availability of housing units developed to residents earning at or below 80% of AMI for at least 35 years. Loans secured through LAP are not intended to cover the full amount of site acquisition costs and are recommended to be used in tandem with other funding sources.

A partnership was created between the WSHFC and Microsoft in 2020 called the Expanded Land Acquisition Program (ELAP). ELAP specifically targets land investments in Redmond, Bellevue, Kirkland, Issaquah, Renton, and Sammamish. Loans granted through the ELAP differ from the traditional LAP in that units are available to residents earning up to 120% of AMI. Additionally, this program is open to all

⁹⁶ 2022 Homeless Housing Project Expenditure Report/”Golden”.
<https://www.commerce.wa.gov/serving-communities/homelessness/state-strategic-plan-annual-report-and-audits/>

⁹⁷ Washington State Department of Commerce Guidance to Address Racially Disparate Impacts, April 2023. Page 110.

⁹⁸ RCW 39.89.020.

⁹⁹ <https://www.wshfc.org/mhcf/lap/index.htm>

developers, including for profit developers, local governments, housing authorities, non-profit organizations, and tribes.¹⁰⁰

HUD Continuum of Care (COC) Program

HUD's Continuum of Care (CoC) Program provides funding to non-profit providers, as well as state and local governments, to assist in the rehousing of adults and families with children who are experiencing or at risk of homelessness.¹⁰¹ HUD awards funding grants to each state, which are then allocated to local governments, jurisdictions, and housing authorities. In King County, COC grants are managed and allocated by the King County Regional Homelessness Authority (KCHRA), which was created in 2021 and submits applications to HUD for McKinney Continuum of Care Homeless Assistance Grant Funds.¹⁰²

The KCHRA submitted to HUD a prioritized application total of approximately \$63.6 million, to finance various COC projects throughout King County in 2023.¹⁰³ Meanwhile, in 2022 King County received nearly \$57.9 million in HUD COC funding.¹⁰⁴ This funding has directly supported 59 projects, shelters, homeless services and initiatives, including many managed by the King County Housing Authority. Since 2018, approximately \$190.4 million in COC funding has been awarded to providers in King County.¹⁰⁵

Other Funding Sources Available to Homeowners, Developers, and Local Governments

Other programs available in Washington State that support affordable housing include:

Programs for Local Governments and Non-profits:

- Commerce offers technical assistance and low interest loans to local and regional governments, ports, tribes, non-profit agencies, and private businesses through the Brownfield Revolving Loan Fund (BRLF). Eligible entities may receive loans

¹⁰⁰ <https://www.wshfc.org/mhcf/lap/elap.htm>

¹⁰¹ <https://www.commerce.wa.gov/serving-communities/homelessness/continuum-of-care/>

¹⁰² <https://kcrha.org/resources/continuum-of-care/>

¹⁰³ https://kcrha.org/wp-content/uploads/2023/09/WA-500-FY2023-Priority-Listing-and-Rank-Order_Final.pdf

¹⁰⁴

https://www.hud.gov/sites/dfiles/CPD/documents/CoC/2022/WA_Press_Report.pdf

¹⁰⁵ https://www.hud.gov/program_offices/comm_planning/coc/awards

to help clean up contaminated properties for redevelopment activities, including affordable housing development.¹⁰⁶

- HUD provides federal grant funding through its Emergency Solutions Grants (ESG) program, which helps to provide street outreach, fund emergency shelters, and offer rental assistance and related services to adults and families with children experiencing or at risk of homelessness.¹⁰⁷
- As codified in RCW 39.33.015, any state agency or jurisdiction can transfer, lease, or give away land they own to be used for affordable housing public benefit, which is rental or permanently affordable housing for low-income and very low-income households.¹⁰⁸
- Counties, cities, or towns that charge development impact fees may waive up to 100% of these fees, as written in RCW 82.02.060 for permanently restricted affordable housing rental or sale units for households earning at or less than 80% of AMI.¹⁰⁹
- Additional incentive programs that a city or county who plans under the GMA may leverage include height and bulk bonuses, parking reductions, and expedited permitting, according to RCW 36.70A.540.¹¹⁰ Additionally, jurisdictions can expand on the programs previously listed by including fee waivers or exemptions and density bonuses within the UGA.
- The USDA helps facilitate the construction of homes for low-income borrowers through its 523 Mutual Self-Help Housing program, where the Rural Community Assistance Corporation (RCAC) or other non-profits supervise the construction which is carried out by a self-help grantee group, who carries out at least 65% of the construction work, or sweat equity, and also manages the construction loans, provides homeownership training, offers building plans, helps to qualify the borrower for their mortgage and markets the program in the service area.¹¹¹

Programs for Low-Income Households and Housing Seekers:

- Washington State Department of Commerce Washington State Foreclosure Fairness Program provides foreclosure assistance

¹⁰⁶ <https://www.commerce.wa.gov/serving-communities/brownfields-revolving-loan-fund/>

¹⁰⁷ <https://www.commerce.wa.gov/serving-communities/homelessness/emergency-solutions-grant/>

¹⁰⁸ <https://app.leg.wa.gov/RCW/default.aspx?cite=39.33.015>

¹⁰⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=82.02.060>

¹¹⁰ <https://app.leg.wa.gov/RCW/default.aspx?cite=36.70A.540>

¹¹¹ <https://www.rd.usda.gov/programs-services/single-family-housing-programs/mutual-self-help-housing-technical-assistance-grants>

including housing counseling, legal aid, and foreclosure mediation.¹¹²

- Washington State Department of Commerce Mobile/Manufactured Home Relocation Assistance Program reimburses between \$7,500 and \$12,000 for relocation, and also provides reimbursement for demolition, removal, and down payments for a new mobile/manufactured home.¹¹³
- The WSHFC offers very low-, low- and moderate-income residents of manufacturing homes the ability to purchase and manage the communities in which they reside, through the Manufactured Home Community Investment Program.¹¹⁴
- WSHFC offers two home-buying programs to prospective low- and moderate-income households, who can apply for mortgages through either the Home Advantage or House Key Opportunity programs, in addition to offering 11 down payment assistance programs where the WSHFC connects buyers to a network of participating lenders who handle the loan process from origination to closing.¹¹⁵
- The U.S. Department of Housing and Urban Development manages the Section 8 Public Housing program, which is administered by publicly chartered housing authorities throughout Washington. The program allows households earning less than 30% of the AMI to apply for housing vouchers which can be accepted at a range of housing types including single-family houses and high-rise apartments for elderly families.¹¹⁶
- HUD offers federal funding through its Section 811 Project Rental Assistance (PRA) program, which integrates Section 811 units intended for extremely low-income, non-elderly disabled households into existing, new, or rehabilitated multifamily developments.¹¹⁷
- HUD provides federal funding to assist communities by providing utility, deposit, and ongoing rental assistance through its Tenant-Based Rental Assistance (TBRA) program.

¹¹² <https://www.commerce.wa.gov/%20building-infrastructure/housing/foreclosure-fairness/>

¹¹³ <https://www.commerce.wa.gov/building-infrastructure/housing/mobile-home-relocation-assistance/>

¹¹⁴ <https://wshfc.org/mhcf/manufactured.htm>

¹¹⁵ <https://www.wshfc.org/buyers/key.htm>

¹¹⁶ Washington State Department of Commerce Guidance for Updating your Housing Element, August 2023. Page 152.

¹¹⁷ <https://www.commerce.wa.gov/serving-communities/homelessness/hud-section-811-rental-assistance/>

Households earning 50% or less of AMI are eligible for this program.¹¹⁸

- HUD allocates grant funding to low- and moderate-income persons in any Indian tribe, band, group, or nation (including Alaska Indians, Aleuts, and Eskimos) through its Indian Community Development Block Grant (ICDBG) Program, which helps these populations find housing and economic opportunities.
- The USDA offers loans and grants to fund housing repairs through its Section 504 Home Repair program, offering a maximum of \$40,000 in loans and \$10,000 in grants, the latter of which are reserved for residents who are 62 or older, or a combination of the two for a maximum of \$50,000 in grant funding and loans.¹¹⁹
- Administered by the United States Department of the Treasury, the New Markets Tax Credit Program (NMTC) facilitates the investment of capital into low-income communities by offering individuals and corporations the ability to receive a tax credit against their federal income tax in exchange for investing equity into Community Development Entities (CDEs), which can total 39% of the original investment amount and is claimed over a period of seven years.¹²⁰
- Low-income persons, households, non-profits, development authorities, housing authorities, or other local agencies can apply for fee waivers for water or sewer connections to delay tap-in charges, connection, or hookup fees for water, sanitary or storm sewer, electricity, gas, or other utilities, as defined in RCW 35.92.380.¹²¹
- Very low- and low-income households can apply for property tax deferments of up to 50% of special assessments, real property taxes, or both, provided their monthly combined income did not exceed fifty-seven thousand dollars in the preceding calendar year.¹²²
- Retired persons or property owners who are at least 60 years or older can defer property tax payments and/or special

¹¹⁸ <https://www.commerce.wa.gov/serving-communities/%20homelessness/tenant-based-rental-assistance-tbra/>

¹¹⁹ <https://www.rd.usda.gov/programs-services/single-family-housing-programs/single-family-housing-repair-loans-grants>

¹²⁰ <https://www.cdfifund.gov/programs-training/programs/new-markets-tax-credit>

¹²¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=35.92.380>

¹²² <https://app.leg.wa.gov/RCW/default.aspx?cite=84.37.030>

assessments of up to 80% of the owner's total equity in the home, provided their income does not exceed 75% of AMI.¹²³

- Seniors, retired persons, veterans, and individuals with other qualifications can apply for tax deferments, as well as partial or full exemptions, provided they meet certain criteria as outlined in RCW 84.36.381.¹²⁴

Programs for Housing Developers:

- The Washington Department of Archeology and Historic Preservation (DAHP) facilitates the offering of federal tax credits to developers who intend to redevelop properties listed in the national register of historic places, where they can receive up to a 20% federal income tax credit dependent on the qualified amount of private investment spent to rehabilitate buildings on the National Register.¹²⁵
- WSHFC offers low-interest loans and tax-exempt or tax-credit bonds through the Sustainable Energy Trust, to homeowners, property developers, and non-profit entities, to affordably develop and/or update existing energy-efficient buildings, or larger developments where costs exceed \$1 million.¹²⁶

¹²³ <https://app.leg.wa.gov/RCW/default.aspx?cite=84.38.030>

¹²⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=84.36.381>

¹²⁵ <https://dahp.wa.gov/grants-and-funding/federal-historic-tax-credit>

¹²⁶ <https://www.wshfc.org/energy/index.htm>

City of Bellevue Housing Economic Policy Analysis: Phase 1 Policy Implications Report

January 19, 2024

INTRODUCTION

Background and Purpose

The City of Bellevue, King County's second-largest city, is experiencing a housing shortage in line with the remainder of the Puget Sound Region and throughout the country. Housing shortages have resulted in increasingly more expensive housing costs associated in the region, which is creating an additional burden on Bellevue's lower-income households. Additionally, as local policies urge affordable housing development and allocate projected population growth to urban areas, Bellevue's affordable housing needs will continue to rise for the next 25 years.

This two-part study aims to conduct an analysis of housing policy and programs relevant to affordable housing and determine the impact of both voluntary and mandatory affordable housing programs on housing development. Phase I of the study includes:

- An **existing conditions report** that discusses statewide, regional, and local affordable housing policies and programs, analyzes Bellevue's existing real estate market conditions, and provides an assessment of available affordable housing funding and funding sources used by Bellevue. This is provided as a separate deliverable to the City of Bellevue.
- A **policy implications report** (included below) that identifies best practices and successful tools that have been used to stimulate the production of affordable housing units based on case studies and secondary research and assesses the policy implications of implementing both voluntary and mandatory affordable housing requirements in Bellevue.

Phase II of the study will develop a scenario analysis tool that will test parameters of programs recommended in Phase I through a financial feasibility tool. Outputs will summarize financial feasibility and development typologies under three policy scenarios. Each scenario will include the program parameters, including FAR incentives or bonuses, as well as affordable housing requirements and income limits. Findings on the development feasibility impacts of each scenario as well as scenario parameters will be documented in a final report.

Methods

This policy implications report begins with an overview of three voluntary and mandatory affordable housing programs (incentive zoning, mandatory inclusionary zoning with fee in-lieu, and commercial fee in-lieu) with a focus on the legal basis, eligibility, and parameters of each program. Case studies were built off a literature review of housing policies in cities in Washington and across the nation and interviews with staff from five cities (Kirkland, WA; Seattle, WA; Boulder, CO; San José, CA; and South San Francisco, CA) who developed, implemented, and/or monitor these programs. Interviews provided insights into best practices and considerations for a city that might undertake a similar housing policy or program. Program data collected by each city is synthesized and visualized, when available.

High-level secondary research was also conducted for this report to identify if jurisdictions nationally have adopted incentive or inclusionary zoning code that includes threshold or velocity triggers or code that is responsive to market conditions. This research included reviewing existing literature on affordable housing programs, reviewing land use code for example jurisdictions who have implemented incentive or inclusionary zoning programs, and reaching out to the Washington State Department of Commerce to request any available information on this.

Lastly, a funding gap analysis was conducted using the methodology from the Washington State Department of Commerce *Guidance for Updating Your Housing Element* and data from City of Bellevue, ARCH, and the Department of Commerce. Alternate methodologies for the funding gap analysis are also discussed such as using the subsidized cost, rather than the full cost of production.

Organization of the Report

The following report is organized as follows:

- **Overview of Statewide Housing Policies.** Summary of three voluntary and mandatory affordable housing programs (incentive zoning, mandatory inclusionary zoning with fee in-lieu, and commercial fee in-lieu) with a focus on the legal basis, eligibility, and parameters of each program.
- **Case Studies.** Includes literature review, interview findings, and data on affordable housing policies and programs in Kirkland and Seattle in Washington, Boulder in Colorado, and South San Francisco and San José in California.

- **Catalyst Provisions.** Presents findings from high-level research to identify if jurisdictions nationally have adopted incentive or inclusionary zoning code that includes threshold or velocity triggers or code that is responsive to market conditions.
- **Funding Gap Analysis.** Identifies an order of magnitude funding gap to meet identified needs for affordable housing units.
- **Recommendations.** Includes recommendations on policy options for further study in Phase 2.

OVERVIEW OF STATEWIDE HOUSING POLICIES

This study focuses on three affordable housing programs: density bonus or incentive zoning (voluntary), inclusionary zoning with fee in-lieu (mandatory), and commercial fee in-lieu. The legal basis for implementing these programs in jurisdictions in Washington state and the elements for designing each program are described briefly in this section of the report. This section also summarizes findings from a non-exhaustive literature review on the effectiveness and impacts of voluntary and mandatory programs.

Incentive Zoning (Voluntary)

Incentive zoning is a land-use regulation strategy that allows property owners to receive certain benefits or exemptions from zoning restrictions in exchange for meeting certain public goals or objectives. It provides an economic incentive for property owners to undertake certain activities that benefit the community.¹

Legal Basis

Cities and counties in Washington can enact incentive zoning programs to stimulate and facilitate affordable housing development, as outlined in RCW 36.70A.540 (1)(a).² Incentive zoning provides a menu of incentives and public benefits, which the local code must delineate explicitly.

One such tool that can be offered to developers is a **density bonus**. Density bonus programs are voluntary, and developers choose to “opt into” a density bonus. Density bonuses are a zoning tool that permits developers to build more housing units, taller buildings, or more floor space than normally allowed in exchange for providing a defined public benefit, such as including affordable units in the development. An

¹ Wex Legal Encyclopedia, Cornell Law School, March 2023.

² RCW 36.70A.540.

affordable housing density bonus program can also be designed to allow developers to contribute to a housing fund in lieu of building the affordable units on site:

“in lieu of low-income housing units if the jurisdiction determines that the payment achieves a result equal to or better than providing the affordable housing on-site, as long as the payment does not exceed the approximate cost of developing the same number and quality of housing units that would otherwise be developed (RCW 36.70A.540(2)(h)).”

Eligibility and Parameters

New or amended density bonus programs must establish affordable housing income levels no higher than 50% of the area median income (AMI) for rental units, and 80% of AMI for ownership housing³. Local jurisdictions may hold a public hearing to establish higher or lower income levels based on housing market conditions, but those levels cannot exceed 80% of AMI for rental units and 100% of AMI for ownership dwellings. Affordable units must remain affordable for at least 50 years.

The following elements go into the design of a density bonus program:

- **Geographic scope.** These will depend on local housing conditions, affordable housing needs and the housing market.
- **Program targets/goals.** These include the level of affordability and tenure (rental and/or ownership) that the program will target.
- **Bonuses to be granted** (for example, density, height, or floor area ratios). The value of bonuses should be proportionate to the cost to the developer of providing the bonus. Also, bonus densities should match what the private market demands, or the program needs to be directed to areas with capacity development and interest.
- **As-of-right vs discretionary bonus.** As-of-right bonuses spell out the precise elements of each bonus feature and its corresponding density gain. A discretionary process, such as a conditional use process, determines the bonus on a case-by-case basis.
- **Off-site alternatives**, such as a fee in-lieu option.

³ Housing Innovations Program: Density Bonuses, Puget Sound Regional Council.

Mandatory Inclusionary Zoning with Fee In-lieu

Inclusionary zoning stipulates that new residential development in certain zones includes some proportion or number of affordable housing units or meets some type of alternative compliance. Inclusionary zoning taps into economic gains from rising real estate values to create affordable housing for lower income households. This approach can create more affordable housing in neighborhoods with access to transportation and quality jobs.⁴

Legal Basis

In Washington state, counties and cities that plan under the Growth Management Act (GMA) can enforce a mandatory inclusionary zoning program as stipulated by state law,⁵ which would require the inclusion of affordable units in every new residential development. These programs offer developers the option to pay a fee in-lieu of developing affordable units, or the option to build affordable units offsite. Inclusionary zoning may or may not offer incentives such as density bonuses, expedited approval, and fee waivers to help offset the cost of developing affordable housing.

Eligibility and Parameters

Mandatory inclusionary zoning regulations should include the following:

- **Minimum number of affordable units to be provided**, expressed as a percentage of a development's total number of dwelling units, or an alternative such as payment of an in-lieu fee or development of a minimum number of affordable units at a different location.
- **Targeted income range of households to be served** by the affordable units: usually expressed as a percentage of the AMI. As stipulated by state law, the income level for rental housing may not exceed eighty percent of the county area median family income. The income level for owner occupancy housing may not exceed one hundred percent of the county area median family income.
- **Time period** within which the designated units must be maintained as affordable. In Washington, all units developed

⁴ Housing Innovations Program: Inclusionary Zoning, Puget Sound Regional Council.

⁵ RCW 36.70A.540 and WAC 365-196-870.

through a mandatory inclusionary zoning program must remain affordable for at least 50 years.⁶

- **Geographic scope**, usually limited to designated areas that are planning for more growth, such as downtowns, mixed-use development areas, and neighborhoods with walking access to high-capacity transit.

In addition, municipalities can determine requirements and exemptions around participation in an inclusionary zoning program. Some mandatory programs require all residential developments to provide affordable units or pay the in-lieu fee; other programs may include exemptions for smaller multi-family residential projects or residential projects that provide a different public benefit.

Commercial Fee In-Lieu or Commercial Linkage Fees

Commercial linkage fees are a form of impact fee assessed on new commercial developments or major employers based on the need for workforce housing generated by new and expanding businesses. Revenues generated by the fee are then used to help fund the development of affordable housing within accessible commuting distance to the employment center.⁷

Legal Basis

Commercial fees-in lieu, also called commercial linkage fees, can be charged by jurisdictions planning under GMA as stipulated by state law⁸ to fund affordable housing development indirectly and directly in instances where significant residential and/or commercial growth is anticipated. These fees can be assessed primarily on mixed-use nonresidential developments, including retail centers, industrial and manufacturing facilities, and other commercial projects, to offset the anticipated job growth from the commercial development. Communities can charge developers a fee for each square foot of new market-rate construction and use the funds to pay for affordable housing. These programs are structured to require fees rather than units onsite.

Eligibility and Parameters

Jurisdictions that implement and charge commercial linkage fees need to establish the maximum fee level based on findings from a nexus study. A nexus study is recommended to fully gauge the impact that the

⁶ RCW 36.70A.540

⁷ Housing Innovations Program: Commercial Linkage Fees, Puget Sound Regional Council.

⁸ RCW 36.70A.540 and WAC 365-196-870.

new commercial development will have on the local housing market.⁹ Jurisdictions also need to determine how the fees will be used, who will administer the fees, timing, and basis for adjustment to the fees, and any alternatives offered for paying the fees (performance option). Jurisdictions may also consider phasing in the fee over time since a sudden increase in costs may be difficult to absorb for developers depending on the market. Phasing a new fee in stages over two or three years will allow time for land prices to adjust appropriately without unduly impacting projects that are in the development pipeline¹⁰.

Considerations for Mandatory or Voluntary Programs

Existing research on affordable housing programs finds that **mandatory programs are far more prevalent in the United States compared to voluntary inclusionary zoning programs**. Studies report that mandatory programs represent anywhere between 65% and 83% of all local inclusionary zoning programs¹¹.

When comparing mandatory versus voluntary programs, some studies^{12,13} found that **mandatory programs tend to generate a greater number of affordable units compared to voluntary programs**. One recent study found that mandatory inclusionary zoning programs were 1.5 times more likely to produce at least one affordable unit than voluntary programs¹⁴. However, several researchers have concluded that voluntary programs can also produce affordable housing

⁹ “Commercial Linkage Fees”, PSRC, August 2020.

¹⁰ “Linkage Fee Programs”, Grounded Solutions Network, 2019.

¹¹ “Inclusionary Housing in the United States: Prevalence, Practices, and Production in Local Jurisdictions as of 2019”, Ruoniu Wang, Ph.D., Sowmya Balachandran, Grounded Solutions Network, 2021; “Separating Fact from Fiction to Design Effective Inclusionary Housing Programs”, Lisa A. Sturtevant, Ph.D, Center for Housing Policy, National Housing Conference, May 2016.

¹² “Los Angeles’ Housing Crisis and Local Planning Responses: An Evaluation of Inclusionary Zoning and the Transit-Oriented Communities Plan as Policy Solutions in Los Angeles.”, Zhu, Linna, Evgeny Burinskiy, Jorge De la Roca, Richard K. Green, and Marlon G. Boarnet *Cityscape* 23 (1): 133-160, 2021.

¹³ “Can Inclusionary Zoning Be an Effective and Efficient Housing Policy? Evidence from Los Angeles and Orange Counties.”, Mukhija, Vinit, Lara Regus, Sara Slovin, and Ashok Das, *Journal of Urban Affairs* 32 (2): 229–52, 2020.

¹⁴ “Examining the Effects of Policy Design on Affordable Unit Production Under Inclusionary Zoning Policies”, Ruoniu Wang and Xinyu Fu, *Journal of the American Planning Association*, 2022.

when there are appropriate incentives or offsets that make the voluntary option attractive and can offset the cost to developers¹⁵.

Although mandatory inclusionary zoning programs appear to be more successful, **the effectiveness of all programs is often dependent on location and policy type**. Several conclusions may be drawn from the available research about how to design effective programs¹⁶:

- Inclusionary housing programs tend to work best in **markets with strong market-rate housing production**.
- Inclusionary housing programs **should include well-designed incentives** based on local housing market conditions that offset the cost to developers and **need to be reviewed over time** to ensure they remain meaningful and effective.
- Inclusionary housing programs **should have clear requirements and consistent administration to ensure predictability**.
- **Flexible compliance alternatives** (on-site or off-site production, cash or land in lieu, exemptions for smaller developments) help improve program feasibility by offering developers various ways to meet affordability obligations.

Evidence from literature on the private-market effects of inclusionary zoning are mixed, and many researchers acknowledge the lack of rigorous evidence. Also, most studies focus on just a few cities and states, limiting the broader applicability of their findings.

Whether voluntary or mandatory, studies using a multi-variate analysis approach, which aim to control for local characteristics, typically have found no statistically significant relationship between IZ programs and increased market-rate housing costs or decreased housing production. While these studies work to control for local characteristics that could skew results, they are not considered perfect, and researchers recognize the inherent uncertainties in statistical analysis.¹⁷

On the other hand, descriptive studies have been more likely to show evidence of negative impacts to the local housing market upon implementation of an inclusionary zoning program. For example, a

¹⁵ “Separating Fact from Fiction to Design Effective Inclusionary Housing Programs”, Lisa A. Sturtevant, Ph.D, Center for Housing Policy, National Housing Conference, May 2016.

¹⁶ Ibid.

¹⁷ “Separating Fact from Fiction to Design Effective Inclusionary Housing Programs”, Lisa A. Sturtevant, National Housing Conference, May 2016.

study in 2004 found that IZ programs in select California cities had higher housing prices and lower housing production than California cities without IZ programs. However, these studies are met by criticism of limited data and non-rigorous analysis design.¹⁸

CASE STUDIES

The following section reviews affordable housing programs across five jurisdictions. The selected jurisdictions have similar housing affordability challenges to the City of Bellevue and have implemented successful programs to support affordable housing production. The programs discussed include inclusionary zoning programs found in Kirkland and Seattle, Washington; commercial linkage fee programs in Boulder, Colorado and San José, California; and incentive zoning programs in South San Francisco, California and Seattle, Washington. Throughout the review, city staff were interviewed to discuss each program and gain insights into best practices, program successes, and program challenges faced by each jurisdiction.

The table below summarizes program goals, number of housing units created through the program, or the amount of fees collected, and the year the program was adopted for each of the five cities.

¹⁸ “Inclusionary Zoning: What Does Research Tell Us about the Effectiveness of Local Action?”, Urban Institute, January 2019.

Exhibit 1. Program Goals, Production, and Adoption Year by City

Jurisdiction	Program	Objective	Adoption Year	Units Produced/ Fees Collected
Seattle	Incentive Zoning (Voluntary)	- To implement affordable housing incentives authorized by RCW 36.70A .540	2008	410 units/ \$78 mill
	Inclusionary Zoning - MHA-R (Mandatory)	- Achieve the goal of providing affordable housing in Seattle	2017	89 units/ \$246.1 mill
Kirkland	Inclusionary Zoning (Mandatory)	- Providing affordable housing units in commercial zones, high density residential zones, medium density zones, office zones, and transit-oriented development zones. - There is a limited stock of land within the City zoned and available for residential development and there is a demonstrated need in the City for housing which is affordable to persons of low and moderate income.	2010	231 units
Boulder	Commercial Linkage Fee	- Implement city's policy that "growth pay its own way" - Address concerns that non-residential sector is not contributing proportionately to mitigate impact of job growth on affordable housing - Address the increased need for affordable housing	2016	\$12 mill
San José	Commercial Linkage Fee	- Create a funding mechanism to increase the supply of affordable housing in San José without reference to a specific development or property - Improve public welfare in the City of San José and help implement the city's housing goals from their General Plan	2020	\$0.9 mill*
South San Francisco	Incentive Zoning (Voluntary)	- To help address the shortage of affordable housing	1979	Not Available

Source: Community Attributes, 2023; City of Kirkland, 2023; City of Seattle, 2023; City of Boulder, 2023; City of San José, 2023; South San Francisco, 2023.

*Note: *Fees collected for San José are since 2022.*

Case Study Findings and Recommendations for Bellevue

The primary implications of the case studies are attributable qualitative analysis. **Quantitative comparisons between programs would be difficult because of variations in the design and implementation of each program that may affect outcomes.** Therefore, this analysis focuses on the qualitative assessments provided by city staff in the five case study cities: Kirkland and Seattle in Washington; Boulder, Colorado; and San José and South San Francisco, California.

Many interviewed cities have set their affordable housing criteria to what they believe to be the 'bare minimum' standards to ensure participation. This sentiment was more prominent for affordable housing programs affecting residential projects, including programs that offer bonuses in return for affordable units, or programs where a blanket upzone was performed in applicable areas. For the City

of Kirkland, the ‘bare minimum’ for rental units currently represents 10% to 15% of units at 50% of AMI depending on building height. Meanwhile, Seattle has set their rental unit requirements between 2.1% to 11% of units made affordable to households earning less than 40% to 60% depending on the size of the unit.

Some interviewees noted that setting ‘bare minimum’ requirements was in response to concerns during program design that requirements may be prohibitive of all development. However, none of the case study cities that heard this concern from developers reported that their programs resulted in a decrease in development. In fact, some are considering increasing the affordability requirements or levels. In addition, cities like Kirkland are **piloting more aggressive affordable housing requirements** through other planning processes, like subarea planning.

In addition, cities reported designing program requirements to guide usage and uptake. For example, South San Francisco’s density bonus program includes a cash in-lieu component. The city sets this at a prohibitively high rate to push developers to commit to building affordable housing units.

Most jurisdictions noted the importance of engaging developers throughout the process of drafting and implementing affordable housing programs. By engaging developers early on and soliciting their input, jurisdictions noted developer objections were generally minimal upon implementation of a program. Additionally, no jurisdiction reported negative impacts on development activity as a result of their programs, whether applicable to residential or non-residential projects. Instead, **jurisdictions cited general market downturns as having a greater effect on housing or commercial space production.**

Staff interviewed for the case studies from Seattle and Kirkland **reported a low utilization rate for their voluntary programs**, so they phased this out in favor of a mandatory program. In addition, some cities noted that **developers do not usually go beyond the required elements of a particular housing policy.**¹⁹

As a part of this, stakeholders noted **regular evaluation and review of their programs** is critical to ensure a program is serving the purpose it was created to serve, and that updates can be made if the program is found to be underachieving in providing the desired public

¹⁹ This excludes affordable housing developers and non-profits that are utilizing additional funding sources for housing development.

benefit. The desired public benefit is set by each individual city and will differ depending on a city's philosophy, housing goals, land use characteristics, and other factors. For example, a larger city may find that collecting in-lieu fees will help build more affordable units in the long run, while smaller jurisdictions which have less opportunities and funding to build 100% affordable developments, will see a greater benefit by promoting affordable units to be included in a market-rate development. By identifying concrete goals, jurisdictions are able to shape their programs towards the outcomes they desire.

Information regarding affordable housing programs is plentiful, with many cities publishing nexus studies, applications, and other useful materials on their city websites. With this available information, **jurisdictions can learn from their peers or neighbors** on how to best set fees or requirements, communicate with developers, or communicate internally to ensure new programs are adopted efficiently and successfully. As a part of this, **internal communication among city departments** administering, tracking, or generally impacted by a new program is crucial to ensure workflows and operations are not interrupted as new affordable housing programs are adopted. In addition, **data tracking is an important element of designing a new affordable housing program** and will allow the city to evaluate the program in future as well as inform other cities wishing to undertake affordable housing programming.

Some cities allow or encourage developers to **combine multiple housing incentives and programs**. For example, allowing inclusionary zoning to be used alongside other affordable housing programs, such as MFTE, can help create additional incentives to developers to help offset the costs of affordable housing development. However, multiple programs may make **data collection and quantifying programs performance difficult**. For example, Boulder's Affordable Housing Fund includes revenues from two funding sources. When the city tracks output for the Affordable Housing Fund, it is unable to attribute units back to the original affordable housing program.

Recommendations for Phase II Analysis

Based on findings from the case studies and research conducted for this report, the following policy options are recommended for further study in Phase II:

- Incentive zoning (voluntary) program

- Mandatory inclusionary zoning applicable to residential projects and with a provision for a fee in-lieu, and a commercial fee in-lieu program
- A variation of the mandatory program above to be further designed.

Inclusionary Zoning: Kirkland, WA and Seattle, WA

Program Overview

Exhibit 2 presents a general overview of Kirkland’s Inclusionary Zoning and Seattle’s Mandatory Housing Affordability – Residential (MHA-R) program. Both programs are mandatory and require developers of residential projects to include affordable units or pay an in-lieu fee. Kirkland’s program is set up to incentivize developers to provide units rather than pay a fee. Historically, the payment option (fee in-lieu) of Seattle’s MHA-R program has been more utilized than the performance option. In 2022, 260 projects chose the payment option, while 14 projects chose the performance option.²⁰ This can be attributed to the fact that, historically, paying the fees under the MHA-R program resulted in a benefit to the feasibility of the project compared to building the affordable units.

Seattle’s program includes four districts that each entail different requirements for MHA. Kirkland’s program was implemented with the same requirements citywide, until a Station Area Plan was adopted for the future NE 85th Street Light Rail in 2023. This Plan includes new and higher affordability percentage requirements in the station area, which will take effect in 2026.

More information about the Kirkland and Seattle programs is available in **Appendix I**.

²⁰ 2022 Mandatory Housing Affordability and Incentive Zoning Report, Seattle Office of Housing, March 2023.

Exhibit 2. Inclusionary Zoning Program Overviews

	Kirkland, WA	Seattle, WA
Policy		
Program Name	Inclusionary Zoning	Mandatory Housing Affordability - Residential
Incentive Offering	Yes, upon request.	None.*
Incentives Offered	Height bonuses, development capacity bonuses, and unit bonuses.	N/A
Maximum Offering	25% of underlying maximum density.	N/A
Variation by Location	Station Area Plan (SAP) with additional requirements will be implemented in 2026.	Yes, by zone.
Type of Housing	Rental and Ownership	Rental and Ownership
Degree of Affordability	50% - 80% AMI	40% - 80% AMI
Affordability Percentage Requirements	10% (15% in future SAP)	2.1% - 11.0%
Duration of Affordability	Rental: Life of Project; Ownership: 50 years.	75 years
Payment/Performance	Both	Both
Fee Rates	Variable**	\$7.27 - \$27.42 (per sf)
Program Review Period	Every 2-years.	Every 5-years.
Performance		
Program Adoption	2010	2017
Program Updates	2023 adoption of SAP	2019
Affordable Units In Service	231	89
Fees Collected	N/A	\$246.1 million
Data as of:	2023	2022

Sources: City of Kirkland, 2023; City of Seattle, 2023; Community Attributes Inc., 2023.

** MHA applies to upzoned areas that provide additional capacity for development within each designated zone. This was a one-time upzone and no additional or ongoing incentives are offered.*

*** The fee is based on the difference between the cost of construction for a prototype affordable housing unit on the subject property, including land costs and development fees, and the revenue generated by an affordable housing unit.*

Best Practices for Implementation

For Kirkland, **information gathering and outreach was a critical component of the citywide and station area plan**, particularly as the city was considering increasing the minimum required percentage of affordable units in the station area. Kirkland staff stressed the importance of spending the necessary time to ensure that City Council, Planning Commission, and stakeholders have ample information to defend the staff recommendation on increasing the affordability requirements and show the balance between delivering affordable units and not hindering development.

Kirkland and Seattle staff **recommend working closely with the development community** when considering the minimum threshold of affordable units and the levels of affordability, as well as providing a better level of understanding for city staff for which types of incentives are actually helpful and appealing to developers. In Kirkland, a few developers were very hands on and shared financial information with the city and its contractors who developed pro forma modeling to test and inform program requirements. This became even more important in adopting the station area plan, during which Planning Commission and City Council indicated that they wouldn't make a decision if they felt that developers had not been a part of the planning process. Seattle staff noted that developer engagement and input was crucial during the program's development.

Kirkland staff also noted that their **program is working exactly as it was designed to. Developers rarely go above the requirements for affordable housing. Therefore, it was critical that they designed a program that would deliver the number of affordable housing units the city wants.** The city decided to set affordability requirements at 50% AMI because outreach and analysis suggested that aiming for deeper levels of affordability was not practical or feasible for the development community. Kirkland is pursuing other subsidies and partnerships to develop housing affordable below 50% AMI. Similar to Kirkland, Seattle staff noted that the MHA-R program is on track and working as intended having collected \$246 million in fees through the payment option and seeing 246 affordable units being committed through the performance option since the program was adopted.

In terms of setting fees, Seattle and Kirkland staff noted the **importance of utilizing nexus studies and referring to how other jurisdictions have gone about setting their fees.** For example, Seattle staff noted that San Diego predicates their fee rates on the calculated sale price of units (including for rental units), which inherently includes downturns in the market, and noted how there are many opportunities to learn from other jurisdictions.

Success Factors and Challenges

City of Kirkland staff note that the **decision for program triggers was important to ensure that developers would not avoid development types to avoid participation.** Kirkland chose four units per acre because, at the time of implementation, they saw a need and market push for medium density housing projects on the horizon and wanted to capture those developments in the program. In addition, the city wanted the surrounding community to be comfortable with the increased density while implementing a robust program.

A major influence in the inclusionary zoning program in Kirkland is the **ability for developers to count affordable units towards both the MFTE and inclusionary zoning programs.** Most developers in Kirkland use the 8-year MFTE program, which has the same threshold as the inclusionary zoning requirements. In rental developments, developers get the benefit of increased development capacity as well as access to MFTE incentives. Staff note that the combining effect of MFTE and inclusionary zoning incentives earned from the same affordable units has increased the uptake of affordable housing above the individual incentives. Staff believe that developers are supportive of the programs because “the city is going beyond making the developer whole.”

Although Kirkland’s new inclusionary zoning requirements in the station area plan will not go into effect until 2026, staff are already excited to see how developers will approach the additional 5% requirement. Staff anticipates that it will provide insight into the feasibility of developing affordable housing, and which metrics – percentage of required affordable units, AMI levels, target audience – are the most salient for developers.

Seattle staff noted that **regular review is helpful in ensuring a program is working as intended.** Seattle is happy with how the MHA-R program works but also noted that the program is not perfect. By building in regular program evaluations, the City allows for regular tweaks to the program to ensure it can maximize the public benefit it can produce. In addition to regular review, Seattle’s Office of Housing produces annual reports tracking the production and fee collection generated by the MHA-R program. Along these lines, Seattle staff advised caution in allowing certain affordable housing programs to overlap, such as incentive (voluntary) and inclusionary (mandatory) programs, as this muddles the reporting for the public benefits provided by each program. Without the ability to clearly quantify the benefit created by each program, a city is unable to properly assess the performance of each program and therefore ensure they are working as intended.

While developer engagement is important, Seattle staff wishes there was greater inclusion of renter input when the MHA-R program was adopted. With renters making up a majority of the city, staff expressed a desire for greater inclusion or renters when housing programs are being put together, particularly for the performance portions.

A challenge to the program noted by Seattle staff was that in some areas of the city, affordable rent limits were the same or

higher than what developers were charging for market rate units. To overcome this, the staff desire a way to set rent or AMI limits by area, rather than using the countywide AMI level for all areas.

Commercial Linkage Impact Fee Program: Boulder, CO and San José, CA

Program Overview

Exhibit 3 presents a brief program overview of the commercial linkage fee programs implemented in Boulder, Colorado and San José, California. Each program was adopted within the last ten years and applies to non-residential development throughout the city. More in-depth information about each program is provided in Appendix I.

Exhibit 3. Commercial Linkage Fee Program Overviews

	Boulder, CO	San José, CA
Policy		
Program Name	Commercial Linkage Fee	Commercial Linkage Fee
Applicability	Non-residential development.	Non-residential projects, and commercial space greater than 5,000 sf in mixed-use developments.
Exemptions	None, but some discretion staff discretion in application.	Retail; Office Space <= 50,000 sf; Industrial Space <= 100,000 sf.*
Variation by Location	Citywide	Citywide
Payment/Performance	Payment	Payment
Fee Rates	\$10.45 - \$31.36 (per sf)**	\$3.49 - \$17.44 (per sf)***
Fee Adjustment Schedule	Annually	Annually
Use of Revenue	Affordable Housing Fund	Affordable Housing Fund
Performance		
Program Adoption	2016	2020
Phase-in Period	3-4 Years	Immediate
Program Updates	NA	2022
Fees Collected	\$12,000,000	\$920,300
Fee Collection Years	2016 - 2023 YTD	2022 - 2023 YTD

Sources: City of Boulder, 2023; City of San José, 2023; Community Attributes Inc., 2023.

** These are general exemptions, but exemptions differ by subarea.*

*** Fees differ by use type.*

****Fees differ by use type and subarea.*

Best Practices for Implementation

Boulder staff stressed the **importance of engaging with the development community**, as well as local economic development organizations like the Chamber in developing the program. Feedback from developers can help inform fee rates and schedules, and outreach

can provide an opportunity for the city to build support for the program among developers.

Boulder and San José staff noted that **internal coordination is crucial for successful implementation**. The departments that will be administering, tracking, or generally impacted by the fee program, such as a city’s permitting, housing, and planning departments should be well educated on the program, and even help develop appropriate elements of the program. Staff suggested that coordination between city departments regarding the program is important from the first drafting of the ordinance that would allow the program to be adopted, ensuring department buy-off and a thorough understanding of the program. Given the increased administrative burden put on cities upon adoption of such programs, San José staff cited the importance of their technology department for helping create sound tracking systems to stay organized with applications and retain data for future tracking.

San José staff also urged jurisdictions considering commercial linkage fees to “not reinvent the wheel.” They **recommend that jurisdictions review and re-use language from other cities’ ordinances and programs and to utilize the vast amount of information available regarding commercial linkage fee programs**. As a part of this, they suggested using other jurisdictions’ application forms as a template to keep the form clear and concise. By using existing information, San José staff felt this would help alleviate, in part, the large effort that adopting a commercial linkage fee program puts on a city. Boulder staff **recommend working with a consultant** who “really knows and understands” the local market to help inform the fee structure and development types that trigger it. This is helpful to ensure a fee structure that is informed by local economic and market conditions.

Boulder staff also recommend **building in a regular reevaluation process to review and modify the fee amount**, on top of annual changes to keep abreast of market and construction trends. When the Boulder program was implemented, it was one of the highest commercial linkage fees in the nation; some elected and city officials now support examining the feasibility and support for an increase that surpasses the annual adjustments.

Success Factors and Challenges

The Boulder Municipal Code and interviewed Housing and Human Services staff note that a Commercial Linkage Impact Fee program is a **particularly useful tool when a city is seeing a shrinking supply of land available for new housing and commercial development**.

Staff attribute **some of the success of the linkage fee to the unexpected growth in large format redevelopment** as a part of an increase in life sciences in Boulder. Since the linkage fee was implemented, Boulder has seen several older and low-density light industrial and manufacturing structures redevelop into high-density advanced manufacturing or research and development facilities in industries like life sciences even as the city has seen a decrease in the amount of office space being developed and preserved.

The linkage fee is a discretionary aspect of the permitting review process; a program feature that staff notes has created confusion and a lack of consistency for certain projects. Staff provided the example of an addition to a private school that included additional classroom and communal space in Boulder. Permitting staff opted to only apply the linkage fee to classroom space, which was a small share of the new addition. **Staff recommend consistency and clarity in developing a new program and in applying it appropriately** with clear triggers for which development types must pay the linkage fee. Developers can also receive credit for demolished floor area that offsets the linkage fee they pay on redevelopment. Therefore, the linkage fee required for greenfield development may be more prohibitive than redevelopment.

Boulder staff report that there were **concerns at the time of implementation that the impact fee would lead to a decrease in commercial development; however, the current sentiment is that those concerns did not come to fruition.** In fact, staff note that pandemic-related impacts to the broader construction and development industries have been a bigger impediment to the program, the extent of which is not currently clear. San José staff shared similar sentiments, noting that development has been depressed by general market conditions rather than the fees charged. Staff also mentioned that the timing of when the fee was due - when the development permit was pulled, was found to cause greater issues to developers than the fee itself.

The variability in how the linkage fee program can be applied to certain development types has prevented the city from including the program in its online permit fee calculator. City of Boulder staff believe that this prevents developers from having full clarity and understanding of project costs, which can add to feasibility and development challenges.

The City of San José **suggested not tying fee rate updates to a construction index.** Currently, San José's commercial linkage fee rates are tied to the Engineering News Record (ENR) Construction Cost

Index, and staff noted the annual increases seen near the pandemic have caused significant, and in some cases unsustainable, hikes in their fee rates.

Flexibility with when payments are received while incentivizing early payments will help ensure payments are made in a timely manner. To address this, the City of San José offers a 20% discount in fees when developers pay the fee in full prior to the building permit issuance.

San José staff also noted that **breaking the city into subareas and setting sustainable fees for each subarea** has been important for their program's viability. The city commissioned a feasibility study to help set the fees for each subarea and use type.

Incentive Zoning: South San Francisco, CA and Seattle, WA

Program Overview

The State of California enacted the Density Bonus Law in 1979 to allow a developer to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan. Cities in California are tasked with implementation of this program within their boundaries; therefore, the City of South San Francisco's incentive zoning program is synonymous with the state's Density Bonus Law. In exchange for the increased density, a certain number of the new affordable dwelling units must be reserved at below market rate (BMR) rents. Qualifying applicants can also receive site-specific modifications to required development standards. Greater benefits are available for projects that reach higher percentages of affordability (with unlimited density available for certain transit-adjacent, 100-percent BMR projects).²¹

The City of Seattle's Incentive Zoning program is a voluntary program through which developers may opt to provide public benefits in return for a density bonus. However, Seattle has phased the program out of much of the city in favor of their mandatory MHA-R program, except for certain areas in the city's Downtown and South Lake Union zones.

Best Practices for Implementation

Although the Density Bonus Law is mandatory, there are a few elements of the law which the City of South Francisco has discretion to

²¹ Density Bonus Law, Southern California Association of Governments.

implement, and which can be relevant for other jurisdictions considering implementing an incentive zoning program. These are described in the next section.

The interviewed Seattle staff did not provide much information on the city's phased-out Incentive Zoning program. However, staff did note that programs such as their Incentive Zoning and MHA-R programs should not overlap, as this does not allow the city to quantify the public benefit of each program, and therefore makes it difficult to determine if each program is working as intended when the two programs are used in tandem by a development.

Success Factors and Challenges

Eligibility and performance elements of the Density Bonus Law are not discretionary for California cities. However, cities do have discretion in how they administer and weigh development standards for applicants. South San Francisco staff note that **some developers trigger the Density Bonus Law to gain site specific design standard departures for aspects of the project that do not conform with the city's zoning code.** In some cases, developers do not opt to build the units offered to them through the density bonus, instead using the program to acquire a variance or conditional use permit for certain types of development.

As such, **a city that is wishing to spur housing development and reduce barriers to building, particularly on unusual parcels or geographies, could use a similar development standard provision in a density bonus ordinance to allow flexibility in permitted uses or other aspects of that city's development regulations.** In these cases, city staff note that the affordable units are still built, regardless of the bonus market rate units.

The Density Bonus Law does have a provision that allows developers to pay a fee instead of building the affordable units required by the law. **South San Francisco wants the affordable units built rather than the fee; therefore, the city set the fee at a very high rate of approximately \$330,000 per unit.** This further incentivizes developers to opt to build affordable units. The City of Seattle has seen a different outcome, with the payment option being more enticing to developers compared to the performance option. The payment option

requires developers to pay a fee ranging from \$7.27 to \$27.42 per square foot depending on the zone and market area.²²

Seattle staff noted a **desire for affordable rent and sale price limits to be determined by each subarea within the city**. Under the current system, affordable rent and sale price limits can exceed the market rate prices charged by developers in certain neighborhoods throughout Seattle.

Additionally, City of Seattle staff noted the **low utilization of their voluntary programs** including incentive zoning, green building, and parking reduction programs. Generally, staff gave the notion that developers do not wish to exceed the requirements mandated by the underlying zone of their proposed project.

CATALYST/VELOCITY PROVISIONS RESEARCH

A literature review and outreach to the Washington State Department of Commerce do not indicate any velocity triggers or catalyst provisions in place for municipal housing policies. However, there are some similar cases in which cities have attempted to implement higher affordability requirements.

The cities of Kirkland and Seattle have built in review processes to their Inclusionary Zoning and Mandatory Housing Affordability programs, respectively. Other interviewed cities recommended adopting periodic and regular reviews of program requirements, including fees, the share of affordable units, or levels of affordability, as programs prove to be successful. A mandatory review process may help a jurisdiction to iterate and accelerate productive housing programs.

The City of Sammamish is an example of phased or tiered housing policies contingent upon the pace of development within a subarea. While this is not a velocity trigger or catalyst provision, it is a way in which a city can craft housing policy that can change as redevelopment occurs. In its Town Center code, Sammamish adopted a tiered approach to additional bonus residential units. Section 21.07.050D outlines provisions to obtain additional residential density or commercial development capacity within the Town Center. Projects may obtain additional density by complying with affordable housing provisions, incorporating certain site amenities, and/or through the City's transfer of development rights (TDR) program. The bonus housing unit pool from the city's affordable housing provisions must be exhausted first, on

²² City of Seattle Municipal Code: Chapter 23.58C.040.

a first come, first served basis. Upon exhaustion of these available units, projects may still access bonus units through site amenities and/or the TDR program. Because the total number of housing units that can be built in Town Center is capped, bonus density for early projects can only be obtained through the provision of affordable units; as development occurs and the pool of available affordable units is exhausted, bonus units can only be achieved through subsequent tiers of incentives. While this is not the same approach as a velocity trigger, it does offer one example of a jurisdiction that has tied its incentive tiers to the construction, over time, of housing units.

This is not the only example of a city adopting higher affordable housing standards in subareas. As noted in the case study analysis, Kirkland recently adopted higher requirements in the future light rail station area, which will take effect in 2026. In addition, the Department of Commerce provided two examples of localized policies for areas with a more aggressive housing market. Montgomery County, Maryland mandates a higher inclusionary zoning requirement for its downtown urban areas than less urban areas in the county.²³ Jersey City, New Jersey has a similar program with varied set-asides required for affordable housing based on different criteria based on Local Housing Solutions' inclusionary housing guidance.²⁴

FUNDING GAP ANALYSIS

RCW 36.70A.070(2)(d)(ii) requires that local jurisdictions document “gaps in local funding” in their list of programs and actions needed to achieve housing availability. One optional method to quantify the funding gap is described by the Washington State Department of Commerce in *Guidance for Updating Your Housing Element*. This method consists of four steps and requires the following data:

- **Annual housing units needed by affordability level**, at minimum including units affordable at less than 50% AMI and in high-cost areas units affordable at less than 80% of AMI.
- **Average annual units produced**, which includes any units developed with the support of local, state, federal, or community funding sources.
- **Cost per unit**, which may be informed by data available through the Department of Commerce on the cost of units

²³ Moderately Priced Dwelling Units (MPDUs) Program – General, Montgomery County, MD Department of Housing and Community Affairs.

²⁴ Inclusionary Zoning, Housing Policy Library, Local Housing Solutions.

developed with Low Income Housing Tax Credits (LIHTC) or other data to describe the cost per unit for affordable housing.

King County’s Growth Management Planning Council Motion 23-1 recommended updates to the Countywide Planning Policies including jurisdictional housing needs which “are derived from the Washington State Department of Commerce and were adjusted to align with the adopted housing growth targets for the planning period to ensure jurisdictions are planning for growth that is consistent with the goals of the Development Patterns Chapter.”

In total, the CPPs allocate net new housing units of 35,000 for the City of Bellevue by 2044. Of this need, 77% of housing units are at the 50% and below AMI affordability level and 85% of units are at the 80% and below AMI affordability level.

Exhibit 4. Bellevue Net New Units Allocation by 2044

Area Median Income	Net New Units Allocation	% of Total
30% and below	18,195	52%
31%-50%	8,780	25%
51%-80%	2,671	8%
81%-100%	703	2%
101%-120%	798	2%
121% and above	3,853	11%
Total	35,000	100%

Sources: King County, GMPC Motion 23-1, 2023; Community Attributes Inc., 2023.

Exhibit 5 shows the annual average net new housing unit need for 80% AMI and lower for the 25-year planning period between 2019 and 2044. In total for units affordable to 80% AMI or below, the annual average net new need is 1,186 housing units.

Exhibit 5. Annual Average Net New Units, City of Bellevue, 2019-2044

Annual Average Net New Units	
30% and below	728
31%-50%	352
51%-80%	107
Total	1,186

Sources: King County, GMPC Motion 23-1, 2023; Community Attributes Inc., 2023.

Exhibit 6 illustrates average annual production in Bellevue over the past 5 years (2019-2023) of units affordable to households earning 80%

AMI or below according to the City of Bellevue’s affordable housing inventory data (excluding emergency housing)²⁵. In total average annual production for all units 80% AMI or below is 279 units.

Exhibit 6. Average Annual Production, City of Bellevue, 2019-2023

Annual Avg Production	
30% and below	6
31%-50%	20
51%-80%	254
Total	279

Sources: City of Bellevue, 2023; Community Attributes Inc., 2023.

Note: Units grouped as Section 8 or Public Housing within the City of Bellevue’s detailed inventory are captured within the 31-50% category.

Based on the Department of Commerce guidance, the average annual gap in affordable housing production is estimated as the difference between average annual net new unit need and average annual units produced. **Exhibit 7** shows the average annual gap by income level, assuming trends in production match the past five years. The City of Bellevue has produced more units on average than the net need within the 51-80% of AMI category. However, units at 51-80% are not substitutable for units at lower income levels. Therefore, the total average annual gap is 1,054, excluding the over-production within the 51-80% category.

Exhibit 7. Average Annual Housing Unit Gap, City of Bellevue

Affordable Housing Gap	
30% and below	722
31%-50%	332
51%-80%	(147)
Total	1,054

Sources: King County, GMPC Motion 23-1, 2023; City of Bellevue, 2023; Community Attributes Inc., 2023.

The funding gap, following the guidance from the Department of Commerce, is calculated by multiplying the gap in affordable housing production by the cost per unit for affordable housing. Data from the Washington State Housing Finance Commission in the *Guidance for Updating Your Housing Element* indicates that the average cost per

²⁵ The guidance from the Washington State Department of Commerce indicates that the methodology is not appropriate for estimating the funding gap for emergency housing types.

unit in King County is \$340,579. Data provided by ARCH for five projects planned or completed between 2023 and 2025 on the Eastside indicates that the average cost per unit for ARCH projects is nearly \$582,800, higher than the King County average cost. **Exhibit 8** shows the average annual funding gap by AMI level, totaling \$614 million for units serving income levels at or below 50% of AMI, using the cost data provided by ARCH. If the cost assumption is decreased to the King County figure available from the Department of Commerce, the funding gap is estimated at \$358.8 million annually.

Exhibit 8. Estimated Average Annual Affordable Housing Funding Gap, City of Bellevue

	Funding Gap
30% and below	\$420,519,996
31%-50%	\$193,453,185
51%-80%	\$0
Total	\$613,973,181

Sources: King County, GMPC Motion 23-1, 2023; City of Bellevue, 2023; Washington State Department of Commerce, 2023; Community Attributes Inc., 2023.

This funding gap assumes that all units needed to serve households at or below 50% of AMI will be funded fully by local, state, federal or other community funding sources. Additionally, feedback from ARCH staff has indicated that the King County average cost from the Department of Commerce may be an underestimate of the cost to produce affordable units in the City of Bellevue.

Among the 1,654 affordable housing units that came into service between 2017 and 2023, 192 units were developed with a development incentive, while the rest were subsidized new construction or preservation units. All 192 units fall within the 51-80% AMI affordability level. Given that the city has produced on average over the past few years more units than the annual average need at the 51-80% AMI level, estimating the funding gap for subsidized units would not change the results of the analysis.

An alternative way to estimate the funding gap is using a subsidized cost, rather than the full cost of production. The City of Seattle’s 2016 *Seattle Residential Affordable Housing Impact and Mitigation Study* found that the per unit subsidy requirements range between \$190,400 and \$241,100 for units affordable to households at 60% of AMI, with the range dependent on the range of development costs. For units affordable to household at 80% of AMI, the per unit subsidy requirement ranges between \$155,800 and \$206,500. A City of Santa

Rosa *Residential Impact Fee Nexus and Feasibility Study* found that the average affordability gap for units serving households at 50% of AMI is \$210,400.

Assuming a subsidy requirement of approximately \$214,000, based on the affordability gap requirements completed by the City of Seattle and the City of Santa Rosa, the total annual funding gap is estimated at \$225.4 million.

Data available on costs for affordable housing indicate that the funding gap varies substantially depending on cost assumptions. However, analyses indicate a range of funding needed annually between \$225 million to nearly \$615 million per year.

Based on the funding analysis in the *Existing Conditions Report*, the public revenue sources for affordable housing in Bellevue have totaled more than \$87.9 million between 2017 and 2023, or an annual average of nearly \$12.6 million. This equates to identifiable funding sources of \$60,137 per unit of affordable housing between 2017 and 2023²⁶.

Assuming the same requirements for funding sources identified in the *Existing Conditions Report*, total funding requirements for the affordable housing gap is \$63.4 million in funding per year.

²⁶ Total affordable units developed between 2017 and 2023 totals 1,654. Of these 190 are emergency housing and 1,335 are units serving households at 51-80% of AMI. Additionally, 810 units are identified as using City of Bellevue or ARCH funding and 704 with other funding sources. The remaining 140 use development incentive programs. Among the 704 units with other funding sources, 652 are King County Housing Authority or Mary's Place units.

APPENDIX I: CASE STUDIES

City of Seattle, Washington: MHA-R and Incentive Zoning Program

MHA-R Program Overview

Seattle's Mandatory Housing Affordability Residential (MHA-R) program is a developer contribution program that requires residential developments in the city to provide affordable units or pay a fee in-lieu. The program was adopted in 2016 and has been implemented incrementally alongside area-wide zoning changes. The program aims to achieve the goal of providing affordable housing in Seattle through means authorized by RCW 36.70A.540.²⁷ The MHA-R program was last updated in 2019, during which time the program was expanded to include most neighborhoods zoned for multifamily housing.²⁸

Properties within Seattle are subject to MHA-R requirements after the City Council approves a rezone, either initiated by the city or applicant, that increases the density through a height or FAR bonus or establishes a different zoning designation. For areas that have been rezoned, MHA requirements are found in the standards for the zone, or the Property Use and Development Agreements associated with applicant-initiated rezones. Most rezoned areas have an MHA suffix to determine the payment or performance requirements, but there are zones within the city that are subject to MHA requirements but do not have an associated MHA suffix.²⁹

Geographically, MHA zones are separated into four zone designations:

- Downtown, SM-SLU, SM-U 85, and SM-NG zones
- Zones with (M) suffix
- Zones with an (M1) suffix
- Zones with an (M2) suffix

Each zone with an (M), (M1), or (M2) suffix falls in a high, medium, or low market area that dictates the MHA requirements a proposed development must meet.³⁰ Within the designated areas, MHA-R requirements apply to developments that include units created through

²⁷ City of Seattle Municipal Code: Chapter 23.58C.

²⁸ 2022 Mandatory Housing Affordability and Incentive Zoning Report, Seattle Office of Housing, March 2023.

²⁹ [https://www.seattle.gov/sdci/codes/codes-we-enforce-\(a-z\)/mandatory-housing-affordability-\(mha\)-program](https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/mandatory-housing-affordability-(mha)-program)

³⁰ [https://www.seattle.gov/sdci/codes/codes-we-enforce-\(a-z\)/mandatory-housing-affordability-\(mha\)-program](https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/mandatory-housing-affordability-(mha)-program)

new construction, additions to existing structures that adds to the total number of units, alterations within an existing structure that increase the total number of units, or change in use that results in the increase in the total number of units. Fully affordable developments are exempt from the MHA-R program.³¹

Seattle's MHA-R program allows developers to choose between a payment and performance option. The performance option allows the developer to incorporate affordable units into the proposed development, while the payment option allows the developer to make a payment to the City as a part of the permitting process.³²

The MHA-R program's requirements are numerous and complex. Depending on the zone and market area, performance requirements range from 2.1% to 11% of units made affordable to households earning no more than 40% of AMI for rental units of 400 square feet or less in size, 60% of AMI for rental units greater than 400 square feet in size, and 80% of AMI for ownership units.³³ Both affordable rental and ownership units generated through the performance option must remain affordable for 75 years. The payment option requires developers to pay a fee ranging from \$7.27 to \$27.42 per gross residential square foot depending on the zone and market area.³⁴ The payment calculation amounts are tied to the Consumer Price Index and are updated on March 1 of each year. Greater detail regarding performance requirements can be found in City of Seattle Municipal Code Chapters 23.58C.040 and 23.58C.050.

The MHA-R code allows for the modification of payment and performance amounts through an applicant request and subsequent approval by the city. The reasons for modifications vary but include the inability to use certain capacity and severe economic impact.³⁵ MHA-R performance units may not be used to satisfy affordable unit requirements for other programs, such as the city's MFTE program.³⁶

³¹ City of Seattle Municipal Code: Chapter 23.58C.025.

³² [https://www.seattle.gov/sdci/codes/codes-we-enforce-\(a-z\)/mandatory-housing-affordability-\(mha\)-program](https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/mandatory-housing-affordability-(mha)-program)

³³ City of Seattle Municipal Code: Chapter 23.58C.050.

³⁴ City of Seattle Municipal Code: Chapter 23.58C.040.

³⁵ City of Seattle Municipal Code: Chapter 23.58C.035.

³⁶ City of Seattle Municipal Code: Chapter 23.58C.050.

MHA-R units must be approved by the Office of Housing and be comparable to other units in the development in terms of the following:³⁷

- Status as a dwelling units, live-work units, or congregate residence sleeping room
- Number and size of beds/baths
- Net unit area
- Access to amenities
- Functionality
- Terms of the lease.

Ordinance 125108, which established the framework for the Mandatory Housing Affordability – Residential (MHA-R) Program, stated that the City will conduct a post-implementation review of the MHA-R program five years from the effective date of the ordinance, which was conducted in later 2021. Per City staff, this 5-year timeline appears to be a consistent goal for program evaluation. In addition to regular program evaluation, Seattle’s Office of Housing produces an annual report showing the production of units and fees collected as a result of the MHA program.

Production

As of December 2022, there were 89 affordable units in service that were created by the MHA program. A total of 176 additional units have been committed for projects currently under construction. In total, Seattle’s MHA program, which includes a commercial element, has collected \$246.1 million in fees. Of these fees, 87% are associated with the MHA-R program. In 2022, 95% of the projects participating in MHA made affordable housing contributions³⁸.

Incentive Zoning Program Overview

The City of Seattle’s Incentive Zoning program is a voluntary program that allows developers to choose to provide public amenities or pay a fee in return for extra floor area or a height bonus. To receive the incentive, developers are able to provide one of the following:³⁹

- Affordable housing
- Childcare

³⁷ City of Seattle Municipal Code: Chapter 23.58C.050.

³⁸ 2022 Mandatory Housing Affordability and Incentive Zoning Report, Seattle Office of Housing, March 2023.

³⁹ [https://www.seattle.gov/sdci/codes/codes-we-enforce-\(a-z\)/incentive-zoning-program](https://www.seattle.gov/sdci/codes/codes-we-enforce-(a-z)/incentive-zoning-program)

- Open spaces
- Transferable Development Potential and Rights (TDP/TDR)
- Regional Development Credits (RDC).

Seattle’s incentive zoning requirements have been phased out in all but a few Downtown and South Lake Union zones. Incentive zoning requirements are dependent on the underlying zone of a property. Performance option income level requirements align with the requirements set by the MHA-R program.⁴⁰

Production

In 2022, Seattle’s Incentive Zoning program saw 33 affordable units placed in service, with 126 additional units under construction. The program also collected \$17 million in fees in 2022.⁴¹

City of San José, California: Commercial Linkage Fee Program

Program Overview

The City of San José adopted their Commercial Linkage Fee (CLF) program in 2020. The commercial linkage fee is a one-time impact fee that applies to new, non-residential projects. The funds generated by the CLF program are used to facilitate the development of affordable housing for “extremely low, very low, low, and moderate income” households.⁴² The original ordinance identified the following goals for the program:

- addressing the increased need for affordable housing,
- create a funding mechanism to increase the supply of affordable housing in San José without reference to a specific development or property,
- improve public welfare in the City of San José and help implement the city’s housing goals from their General Plan.

San José amended the program in 2022 to make the fee schedule more accommodating for developers and their financing timelines. Fees are set for four geographic subareas that cover the entirety of San José and are updated on July 1 of each year. Fee rate increases are tied to the

⁴⁰ 2022 Mandatory Housing Affordability and Incentive Zoning Report, Seattle Office of Housing, March 2023.

⁴¹ 2022 Mandatory Housing Affordability and Incentive Zoning Report, Seattle Office of Housing, March 2023.

⁴²

<https://www.sanjoseca.gov/home/showpublisheddocument/87526/637922796081970000>

Engineering News Record (ENR) Construction Cost Index in January of each year.⁴³

San José's commercial linkage fee applies to all new office, hotel, industrial/research and development, warehouse, and residential care development. For office and industrial/research and development use types, the fees differ for projects larger than or equal to 100,000 square feet (sf) and less than 100,000 square feet. A 20% reduction in the one-time fee is offered by the city if the fee is paid in full prior to building permit issuance.⁴⁴

The fee rates by subarea are presented below.⁴⁵

Downtown and Nearby subarea

- **Office ($\geq 100,000$ sf):** \$17.44 per square foot.
- **Office ($< 100,000$ sf):** \$0 for all square footage $\leq 50,000$ and \$3.49 per sf for all remaining square footage.
- **Retail:** No fee.
- **Hotel:** \$5.81 per sf excluding common area space.
- **Industrial/Research and Development ($\geq 100,000$ sf):** \$3.49 per square foot.
- **Industrial/Research and Development ($< 100,000$ sf):** No fee.
- **Warehouse:** \$5.81 per square foot.
- **Residential Care:** \$6.98 per square foot excluding common area space.

North San José and Nearby; West San José Urban Villages

- **Office ($\geq 100,000$ sf):** \$5.81 per square foot.
- **Office ($< 100,000$ sf):** \$0 for all square footage $\leq 50,000$ and \$3.49 per sf for all remaining square footage.
- **Retail:** No fee.
- **Hotel:** \$5.81 per sf excluding common area space.
- **Industrial/Research and Development ($\geq 100,000$ sf):** \$3.49 per square foot.
- **Industrial/Research and Development ($< 100,000$ sf):** No fee.
- **Warehouse:** \$5.81 per square foot.

⁴³ <https://www.sanjoseca.gov/your-government/departments-offices/housing/developers/commercial-linkage-fee>

⁴⁴ *Ibid.*

⁴⁵ *Ibid.*

- **Residential Care:** \$6.98 per square foot excluding common area space.

Edenvale and Monterey Corridor

- **Office (>= 100,000 sf):** \$5.81 per square foot.
- **Office (< 100,000 sf):** \$0 for all square footage <= 50,000 and \$3.49 per sf for all remaining square footage.
- **Retail:** No fee.
- **Hotel:** \$5.81 per sf excluding common area space.
- **Industrial/Research and Development:** No fee.
- **Warehouse:** \$5.81 per square foot.
- **Residential Care:** \$6.98 per square foot excluding common area space.

South and East San José Growth Areas

- **Office (>= 100,000 sf):** \$5.81 per square foot.
- **Office (< 100,000 sf):** \$0 for all square footage <= 50,000 and \$3.49 per sf for all remaining square footage.
- **Retail:** No fee.
- **Hotel:** \$5.81 per sf excluding common area space.
- **Industrial/Research and Development:** No fee.
- **Warehouse:** \$5.81 per square foot.
- **Residential Care:** \$6.98 per square foot excluding common area space.

Developers may apply for affordable housing credits, which allows for a reduction in the square footage subject to the commercial linkage fee. These credits require the developer to provide affordable housing units on- or off-site of the commercial development. The required number of units and affordability levels associated with each credit are determined given the subarea within which the proposed development will be built.⁴⁶

Production

Data specific to the San José commercial linkage fee program is limited as the funds are placed in a housing fund designated for generating 100% affordable developments. However, a city official was able to share that since the 2022 update, the commercial linkage fee program

⁴⁶

<https://www.sanjoseca.gov/home/showpublisheddocument/87790/637931393782870000>

has collected \$920,300 and shared that there are tens of millions of dollars the city will collect in the development pipeline.

Boulder, Colorado: Commercial Linkage Impact Fee Program

Program Overview

The City of Boulder, Colorado set a citywide goal that 15% of all housing units need to be permanently affordable for low-, moderate-, and middle-income households by 2035.⁴⁷ As of January 2023, there are over 3,960 affordable homes in Boulder, more than halfway to meeting its goal.

The Inclusionary Housing Program, adopted in 2000, updated in 2009 and 2018, and codified in Chapter 13 of the Boulder Municipal Code, is the primary mechanism by which affordable housing is developed in Boulder and critical to meeting its housing affordability goals.⁴⁸ Chapter 13 sets forth, “because remaining land appropriate for residential development within the city is limited, it is essential that a reasonable proportion of such land be developed into housing units affordable to very low-, low-, moderate and middle-income residents and working people.” The 2018 update mandated that 25% of new housing development in the city must be affordable to support the 2035 goal of 15% permanently affordable housing stock. Approximately 5% of new housing development must now be affordable to middle-income housing and 20% affordable for low- and moderate-incoming housing. Definitions of affordability follow the Department of Housing and Urban Development’s (HUD) classification of Area Median Income (AMI) and are:

- Middle-income households range from 81% to 120% of AMI.
- Moderate-income households range from 61% to 80% of AMI.
- Low-income households range from 0% to 60% of AMI.

Options for meeting the 25% requirement include providing the permanently affordable units on-site, dedicating off-site newly constructed or existing units as permanently affordable, dedicating vacant land for affordable unit development or making a cash contribution to the Affordable Housing Fund in lieu providing

⁴⁷ This goal is included in the Boulder Valley Comprehensive Plan, most recently updated in 2020. The Plan’s jurisdiction includes the City of Boulder, Boulder County, and parts of the remaining Boulder Valley.

⁴⁸ Boulder Municipal Code, Chapter 13.

affordable units.⁴⁹ The Commercial Linkage Impact Fee Program is one affordable housing revenue source that contributes directly to the Affordable Housing Fund for non-residential development within Boulder.

The Commercial Linkage Impact Fee and Inclusionary Housing programs are the primary contributors to the Affordable Housing Fund. The citywide Commercial Linkage Impact Fee Program was approved by City Council in 2015 and implemented beginning in 2016. At the time of implementation, Boulder's fee was one of the highest in the nation, on par with similar programs in cities like Palo Alto, California.⁵⁰ The fee was phased in, starting at 25% of the full amount in September 2015, 50% in December 2015, 75% in March 2016, and 100% in June 2016. The citywide program is an extension of the Commercial Linkage Impact Fee program that was in effect for the downtown core since 2009 which produced roughly \$875,000 in six years⁵¹.

The fee is adjusted annually based on the construction cost index, which staff say results in a modest annual increase. Non-residential developments are charged impact fees based on square footage by type of use. The 2023 affordable housing impact fee rates per square foot of non-residential floor area by non-residential use type are:

- Retail/Restaurant: \$20.91 out of \$23.41 total
- Office: \$31.36 out of \$33.52 total
- Hospital: \$20.91 out of \$22.88 total
- Institutional: \$10.45 out of \$11.25 total
- Warehousing: \$10.45 out of \$11.03 total
- Light Industrial: \$18.29 out of \$19.66 total⁵²

Production

The City of Boulder tracks a variety of metrics related to the Affordable Housing Fund in an interactive, online dashboard. Approximately 3,820 affordable housing have been produced since 2000 through the Affordable Housing Fund. The majority of those are multi-family rental units available to households below 60% AMI.

⁴⁹ Expanding Affordable Housing Options, City of Boulder.

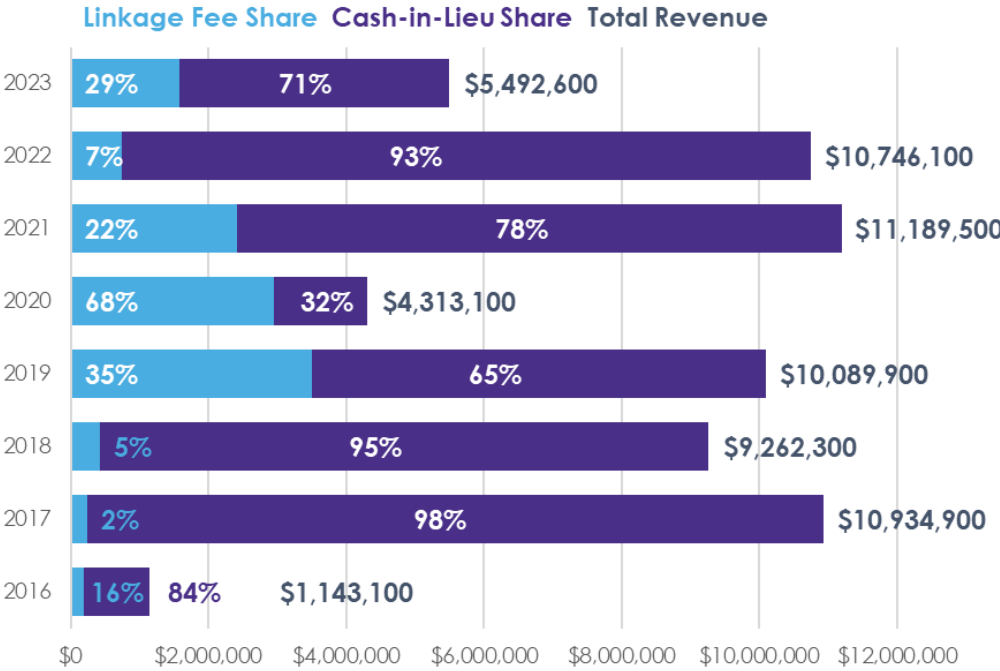
⁵⁰ Staff reported that there have been recent discussions about increasing the fee.

⁵¹ <https://housingtrustfundproject.org/boulder-expands-linkage-fee-to-advance-housing/>

⁵² City of Boulder Planning and Development Services 2023 Schedule of Fees: <https://bouldercolorado.gov/media/10039/download?inline>.

The City of Boulder provided annual revenue from the Commercial Linkage Fee and Cash-in-Lieu programs that is paid into the Affordable Housing Fund since 2016, as shown in **Exhibit 9**. In most years since 2016, most funds came from the cash-in-lieu program; however, the commercial linkage fee has generated \$12,038,200 for the Fund.

Exhibit 9. Annual Revenue and Share of Affordable Housing Trust Fund, City of Boulder, 2016 to 2023



*Source: City of Boulder, 2023; CAI, 2023.
 Note: Data for 2023 includes January to October.*

City of South San Francisco, California: Incentive Zoning (Density Bonus Program)

Program Overview

The State of California enacted the Density Bonus Law in 1979 to allow a developer to increase density on a property above the maximum set under a jurisdiction’s General Plan land use plan. In exchange for the increased density, a certain number of the new affordable dwelling units must be reserved at below market rate (BMR) rents. Qualifying applicants can also receive reductions in required development standards. Greater benefits are available for projects that reach higher

percentages of affordability (with unlimited density available for certain transit-adjacent, 100-percent BMR projects).⁵³

As a state law, incentive zoning through the density bonus program is a mandatory program in cities in California. The City of South San Francisco implements the state Density Bonus Law through Title 20, Division V, Chapter 20.390 of its Municipal Code.⁵⁴ The state law requires any housing development that proposes five or more units and incorporates at least one of the requirements below for a period of 55 years is eligible for a density bonus:

- 5% units restricted to “Very Low Income” (Less than 50% AMI).
- 10% units restricted to “Low Income” rental units or 10% “Moderate Income” for sale units (50% to 80% AMI).
- 100% affordable units with a maximum of 20% moderate units.
- 10% “Very Low Income” units restricted for transitional foster youth, disabled veterans, or homeless.
- 20% “Low Income” units for student housing at accredited colleges.
- A senior housing development (no affordable units are required).
- An age-restricted mobile home park (no affordable units required).
- The project donates at least one acre of land to the jurisdiction for very low-income units, the land has the appropriate permits and approvals, and has access to needed public facilities.
- Projects which include a childcare facility.

Production

All eligible residential development that applies for the program is mandated to meet the Density Bonus Law requirements; as such, the City of South San Francisco does not track affordable units developed in the city.

City of Kirkland, Washington: Inclusionary Zoning

Program Overview

Kirkland adopted their mandatory inclusionary zoning program in 2010, which requires new multifamily and mixed-use developments to include affordable housing units. Per Kirkland’s code, the limited stock of land within the city zoned and available for residential development, alongside the demonstrated need for affordable housing dictated that the city provide development incentives in exchange for public benefits.

⁵³ Density Bonus Law, Southern California Association of Governments.

⁵⁴ [South San Francisco Municipal Code 20.390.](#)

Kirkland achieves these public benefits by allowing residential development, and therefore affordable housing units in commercial zones, high density residential zones, medium density zones, office zones, and transit-oriented zones.⁵⁵

In addition, the city more recently developed new inclusionary zoning requirements in the NE 85th Street Ligh Rail Station Area Plan, finalized in July 2023. The subarea adopted a 15% inclusionary requirement, with the first 10% remaining at the citywide level of 50% AMI and the remaining 5% able to go to an affordability level of 80% AMI, regardless of tenure. Requirements in the station subarea will be phased in in 2026.

Kirkland's citywide inclusionary zoning program requirements differ depending on the zone within which a development is being built. For example, requirements differ for developments in commercial, high density residential, medium density, and office and Neighborhood Mixed Use (NMU), Civic Mixed Use (CVU), and Urban Flex (UF) zones.

The requirements for commercial, high density residential, medium density, and office zones are as follows:

- **Renter-occupied dwellings:** 10% of units affordable to households whose household annual income does not exceed 50% AMI.
- **Owner-occupied dwelling units:** 10% of units affordable to household earning no more than 80% to 100% of AMI depending on the zoning district.

For NMU, CVU, and UF zones, the requirements look as follows:

- **Renter-occupied dwellings:**
 - **Maximum allowed zone height less than 65 feet:** 10% of units at 50% AMI
 - **Maximum allowed zone height of 65 feet or higher:** 15% of units at 50% AMI
- **Owner-occupied dwellings:**
 - **Maximum allowed zone height less than 65 feet:** 10% of units at 80% AMI
 - **Maximum allowed zone height of 65 feet or higher:** 15% of units at 80% AMI

⁵⁵ City of Kirkland Municipal Code, Chapter 112.10.

For any zone where these minimum requirements do not apply, developers may utilize the inclusionary zoning program voluntarily.⁵⁶

Kirkland also offers alternative affordability levels upon proposal. Contingent on the underlying zone, Kirkland will potentially allow lesser bonus units serving households from 60% to 80% of AMI in renter-occupied housing and 70% to 100% AMI for owner-occupied housing.⁵⁷ Additionally, developments can apply for alternative compliance through the form of off-site affordable units, or a payment in-lieu of providing affordable units. Each alternative compliance option carries additional stipulations, as stated in City of Kirkland Municipal Code Chapter 112.30.1 – Chapter 112.30.4.

Per Kirkland Municipal Code Chapter 112.20.2, developments incorporating affordable housing through Kirkland’s inclusionary zoning program are eligible for certain incentives depending on the underlying zoning district. The incentives include height bonuses, development capacity bonuses, and bonus units.⁵⁸ Developments that include a greater number of affordable units than those required can request an exemption from traffic impact fees and park impact fees as well.⁵⁹

Prior to issuing any permits, Kirkland ensures the unit mix and location of affordable units are deemed appropriate. Requirements for affordable units include:⁶⁰

- Affordable units must be intermingled with all other dwelling units.
- Affordable units should consist of a range of bedroom counts comparable to market rate units in the overall development.
- Affordable units should be similar in size to other units of the development with the same number of bedrooms.
- Affordable units should be available for occupancy at the same time as other units in the development.
- The exterior design of affordable units must be comparable to all other units in the development.

⁵⁶ City of Kirkland Municipal Code, Chapter 112.15.

⁵⁷ City of Kirkland Municipal Code, Chapter 112.20.3.

⁵⁸ Note: Maximum unit bonuses are capped at 25 percent of the number of units allowed given the underlying zone of the subject property.

⁵⁹ City of Kirkland Municipal Code, Chapter 112.30.

⁶⁰ City of Kirkland Municipal Code Chapter 112.35.

- The interior finish and quality of construction of affordable units should be comparable to entry level rental or ownership housing in Kirkland.
- For owner-occupied units, the type of ownership should be consistent across all unit types (affordable and market-rate).

Affordable owner-occupied housing units generated through Kirkland’s Inclusionary Zoning program must be affordable for at least 50 years from the date of initial owner occupancy, while affordable renter-occupied units must be affordable for the life of the project.⁶¹

Kirkland’s Inclusionary Zoning program code requires that at least every two years the Planning and Building Department submits a report that tracks the usage of Inclusionary Zoning regulations to the Planning Commission and City Council.⁶²

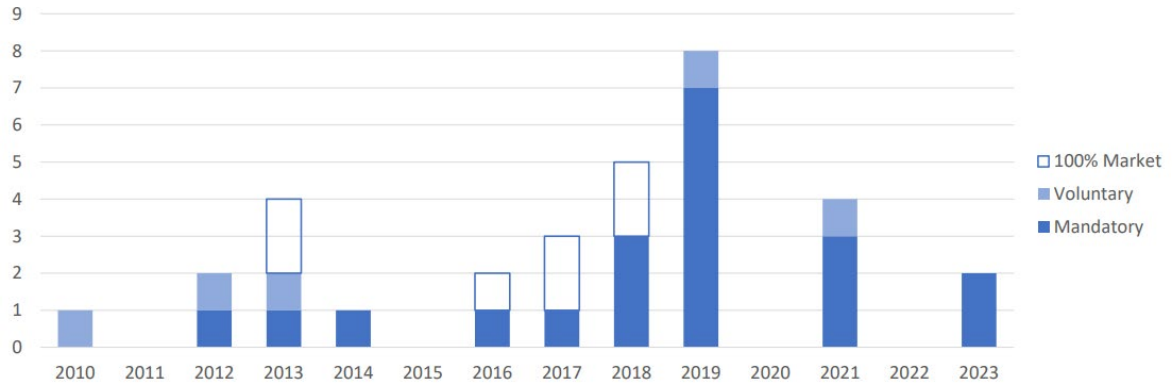
Production

Since 2010, Kirkland’s inclusionary zoning program has helped create 231 affordable units. **Exhibit 10** presents multifamily development projects recorded or permitted since Kirkland adopted their mandatory inclusionary zoning program in 2010. Projects denoted 100% market represent multifamily projects that fell outside of the defined zones for inclusionary zoning and were not required to provide affordable units. Developments built within the mandatory program increased consistently from 2016 to 2019. While 2021, 2022, and 2023 saw a decrease in new multifamily projects compared to pre-pandemic levels, this is likely driven by the increased construction costs and heightened interest rates rather than the City’s Inclusionary Zoning program.

⁶¹ City of Kirkland Municipal Code Chapter 112.35.

⁶² City of Kirkland Municipal Code Chapter 112.40.

**Exhibit 10. Multifamily Development Projects by Year
Recorded/Permitted, Kirkland, 2010 – 2023**



Sources: City of Kirkland, 2023.

Note: Voluntary developments represent multifamily projects in zones falling outside of mandatory inclusionary zoning requirements that opted into providing affordable units.



APPENDIX M

Impact of Growth Alternatives on Tree Canopy, Technical Report



DATE: January 19, 2024

FROM: Jennifer Ewing, Sustainability Manager
Kate Nesse, Senior Planner
Bryce Williams-Tuggle, Demographer
Community Development Department

SUBJECT: Impact of Growth Alternatives on Tree Canopy, Technical Report

Introduction

As part of the Final Environmental Impact Statement (FEIS) for the Comprehensive Plan Periodic Update (CPPU), the City of Bellevue prepared a tree canopy technical report to understand what the future estimated impacts would be to the City's tree canopy under the land use alternatives studied for the CPPU that includes an assessment of the impacts of additional density as a result of the new state legislation relating to middle housing and Accessory Dwelling Units. Middle housing as defined under the recently adopted state legislation (HB 1110) includes two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing. The analysis estimated the potential changes in canopy cover between the No Action Alternative and the Preferred Alternative, using two different analysis approaches to produce a range of potential results. Different tree canopy outcomes can be expected to result from different development approaches studied under the land use alternatives – particularly in terms of the locations and intensities of future growth.

Why Study Tree Canopy

Bellevue's tree canopy is a critical environmental asset and central to the vision of a "City in a Park." The City acknowledges that a healthy and thriving urban forest is integral in providing residents, workers, and visitors with meaningful environmental, social, and economic benefits. Trees can play a large role in improving public health by improving air quality, reducing localized temperatures, fostering a sense of neighborhood character, and addressing climate change. As established in Bellevue's current (2015) Comprehensive Plan, the City has a goal of achieving a tree canopy of at least 40% coverage. According to a Tree Canopy Assessment prepared using 2019 data, the City's current tree canopy nearly achieved that goal, at 39%. For the current Comprehensive Plan update, it is important to consider how the City's policies, regulations, and investments – as well as expected development – could impact tree canopy cover in the future.

Data Sources

This study used the 2019 Tree Canopy Assessment data as a baseline. The increase in growth capacity studied in the FEIS for the plan update is calculated over the development in 2019, so using the 2019 data as a baseline is consistent with other analyses for the FEIS. In addition, the final 2021 Tree Canopy Assessment was not published yet when this analysis commenced. The study also used City geographic

information system (GIS) data layers for neighborhood areas, right-of-way, and parcel zoning. County Assessor data was used for the year of development/redevelopment and the assessed value. To simplify the analysis of the zoning groups, similar zone types were combined into a zone group. For instance, all the downtown zoning designations were combined into the Downtown Central Zone Group and the Downtown Perimeter Zone Group, and all of the BelRed zoning designations were combined into the BelRed TOD Zone Group.

Methodology

The methodology for this analysis is based on a methodology developed by the consulting firm Environmental Science Associates (ESA) to study tree canopy impacts for the City of Seattle’s Mandatory Housing Affordability legislation. The methodology has been adapted to fit the specifics of the alternatives studied in Bellevue’s FEIS for the plan update. The tree canopy analysis focused on Bellevue properties that hold the potential for future development (either vacant or redevelopable properties) as part of the FEIS.

To conduct this analysis, the project team used spatial and tabular data for over 35,000 parcels of land to assess potential canopy impacts across thousands of redevelopable parcels. The analysis used land cover data to calculate current (2019) canopy cover for each parcel and the average canopy cover for each zone group¹. These calculations were used to estimate the projected canopy cover under both the No Action Alternative and the Preferred Alternative by applying the average for the zone group to the redevelopable parcels in both alternatives based on the assigned zone group. Parcels were identified as redevelopable based on the age of the existing development on the site (those developed after 2010 were not considered redevelopable) and the ratio of the county-assessed improvement value to land value. Some parcels, such as parks, are identified as not redevelopable, regardless of the valuation or age of buildings. The data was analyzed at the parcel scale and then compiled for a comprehensive picture of canopy change by each of the City’s 16 neighborhoods and by zone group and is summarized in Table 2.

The study used two approaches for estimating the future canopy for both growth alternatives to provide a range of results. The approaches differ in how the “canopy coefficient” is calculated. In both scenarios the “canopy coefficient” is applied to parcels identified as redevelopable in the No Action and Preferred Alternatives. Parcels identified as not redevelopable are assumed to continue to have the same tree canopy as they currently have. The two approaches used are outlined below (see Table 1 for a list of coefficients by Zone Group).

- Coefficient 1: Average Canopy by Zone Group: The “canopy coefficient” is the average existing canopy cover on all parcels (except parks) within each Zone Group. The average is not weighted by the parcel acreage.
- Coefficient 2: Average Canopy Based on Recent Development: The “canopy coefficient” is the average existing canopy cover on all parcels developed between 2010 and 2023 within each zone group. The average is not weighted by parcel acreage.

¹ Zones were grouped together by type in order to have enough parcels to calculate an average canopy cover.

Table 1. Coefficient Calculation

Zone Group	Total Acres	Coefficient 1*		Coefficient 2**	
		Total Acres	Coefficient	Total Acres	Coefficient
BelRed TOD	163	161	9%	23	6%
DT Central	189	188	7%	22	1%
DT Perimeter	119	99	11%	18	10%
Industrial	143	143	27%	28	20%
Large Lot Residential	3,386	2,228	52%	170	27%
Low Commercial	1,198	1,150	25%	61	13%
Low Density Residential	436	300	27%	12	22%
Middle Density Residential	1,051	1,005	32%	22	27%
Middle Housing***	159	128	25%	11	14%
Middle MU	642	621	20%	35	10%
Suburban 1 Residential	4,662	4,173	37%	305	26%
Suburban 2 Residential	5,074	4,545	33%	319	24%

*Coefficient 1 is the average tree canopy on all parcels in each zone group (excluding parks).

**Coefficient 2 is the average tree canopy on parcels that have developed or redeveloped between 2010 and 2023.

***Middle Housing relates to Townhouse development

The following examples illustrate how the canopy coefficients are applied to the redevelopable parcels, to produce two scenarios for the analysis, to provide a low and high range of tree canopy impacts.

Example 1:

Parcel A is in Zone Group Suburban 2 Residential in both the No Action Alternative and the Preferred Alternative. It is a quarter acre with a 40% tree canopy currently and, based on the criteria, being analyzed as redevelopable in the Preferred Alternative but not redevelopable in the No Action Alternative.

- Scenario 1: In the No Action Alternative, the parcel receives the existing 40% tree canopy with a result of 0.10 acre of tree canopy (0.25 acres x 40% tree canopy). The tree canopy remains the same, because the parcel is not redevelopable in the No Action Alternative. In the Preferred Alternative, the parcel receives the Coefficient 1, which is 33% for Suburban 2 Residential, with a result of 0.08 acres of tree canopy (0.25 acres x 33% tree canopy). Comparing the No Action and the Preferred Alternative, the loss in tree canopy on this site would be 0.02 acres (0.10 – 0.08).
- Scenario 2: In the No Action Alternative, the parcel receives the existing 40% tree canopy with a result of 0.10 acre of tree canopy (0.25 acres x 40% tree canopy), because the parcel is assumed not to redevelop. In the Preferred Alternative, Coefficient 2 is applied to the parcel, which is 24%

for Suburban 2 Residential, with a result of 0.06 acres of tree canopy (0.25 x 24%). Comparing the No Action to the Preferred Alternative the loss in tree canopy on this site would be 0.04 acres (0.10 – 0.06).

Example 2:

Parcel B is in Zone Group Low Commercial in the No Action Alternative but is in Middle MU in the Preferred Alternative. It is 1 acre with 8% tree canopy currently, based on the criteria, and is being analyzed as redevelopable in both the No Action Alternative and the Preferred Alternative. Because Parcel B is identified as redevelopable in both the No Action Alternative and the Preferred Alternative, it would apply the coefficient in both alternatives.

- Scenario 1: In the No Action Alternative, the parcel receives the Coefficient 1 for Low Commercial, which is 25%, with a result of 0.25 acres of tree canopy (1 x 25%). In the Preferred Alternative, the parcel receives Coefficient 1 for Middle MU, which is 20%, with a result of 0.20 acres of tree canopy (1 x 20%). The difference in the tree canopy on this site would be a gain of 0.05 acres, between the No Action Alternative and the Preferred Alternative (0.20 – 0.25). In this case, either alternative assumes a gain in tree canopy on this parcel over the existing.
- Scenario 2: In the No Action Alternative, the parcel receives the Coefficient 2 for Low Commercial, which is 13%, with a result of 0.13 acres of tree canopy (1 x 13%). In the Preferred Alternative, the parcel receives the Coefficient 2 for Middle MU, which is 10%, with a result of 0.10 acres of tree canopy (1 x 10%). The difference in the tree canopy on this site would be a loss of 0.03 acres (0.10 – 0.13), comparing the No Action and the Preferred Alternative. As above, either alternative assumes a gain in tree canopy on this parcel over the existing.

Assumptions

To estimate the future tree canopy for the two scenarios, the following assumptions were made:

- The analysis does not factor in the growth of trees over time, nor future planting of trees, or natural loss of trees due to tree health issues.
- The analysis does not include an analysis of changes to the tree canopy in the right-of-way, in parks, and on school properties, and therefore assumes that the canopy remains the same on these parcels.
- Parcels were identified as redevelopable based on the age of the existing development on the site (parcels developed after 2010 were considered not redevelopable) and the ratio of the county-assessed improvement value to land value. The ratio of improved value to assessed value varied by the zone.
- Recent redevelopment trends were based on tree canopy on parcels redeveloped between 2010 and 2023, using the tree canopy on these parcels as of 2019. This does not account for the growth of the trees on these recently redeveloped parcels. The parcels are likely to have lower tree canopy because the trees are younger, and this analysis does not assume any tree growth.
- Using recent redevelopment trends as a basis for the Scenario 2 analysis, the coefficient considers current tree retention and preservation requirements but does not take into account

any potential changes to the tree code which might result from the City's current effort to review and update the tree code.

- This analysis includes future development of multiple units per lot that is now allowed under state legislation passed last year related to middle housing (HB 1110 and HB 1337) using the City's current lot coverage and tree retention requirements.
- Removal of trees not associated with a development project is not included in this analysis. The analysis only looks at the impact of development on tree canopy.
- The analysis looks at full build out development, assuming all parcels that are considered redevelopable are redeveloped, consistent with the other analyses under the FEIS for the Comprehensive Plan Periodic Update.
- The analysis does not seek to phase in any development over time, or account for growth of newly planted trees on redeveloped sites.

Results

This analysis shows that the tree canopy citywide is projected to be lower at build-out under both the No Action Alternative and the Preferred Alternative. The reduction in canopy is likely smaller under the No Action Alternative (between a reduction of 2 percentage points, using Coefficient 1 and 4 percentage points, using Coefficient 2), because redevelopment is expected to occur under the No Action Alternative. The reduction in canopy under the Preferred Alternative is projected to be between 2 percentage points (using Coefficient 1) and 8 percentage points (using Coefficient 2), because the Preferred Alternative allows for increased development in different zone groups. Table 2 illustrates the impacts on tree canopy for the two scenarios, grouped by neighborhood. And Table 3 illustrates the impacts grouped by Zone Group.

However, there is some variation across the City's neighborhoods. For some neighborhoods, the difference between the No Action Alternative and the Preferred Alternative is small. For example, the difference in Northwest Bellevue is between 2% and -2%. This is likely because Northwest Bellevue is already extensively developed so there is little opportunity for subdivision and very few parcels changed the Zone Group classification in the Preferred Alternative. For other neighborhoods, the difference is markedly lower in the Preferred Alternative. For example, the difference in Eastgate is between -3% and -6%, because the average canopy in Suburban Residential is less than the canopy in Eastgate and the average for parcels built since 2010 is even lower.

Finally, some neighborhoods show a wide variation in the difference between the No Action and Preferred Alternative. This is most remarkable in West Lake Sammamish, Bridle Trails and Cougar Mountain/Lakemont. The wider variation and the significant impact on tree canopy with Coefficient 2 is because recent development in the Large Lot residential group has a much lower tree canopy than Coefficient 1 and somewhat lower for Suburban 1 Residential and Suburban 2 Residential. New trees planted in development since 2010 will not have reached maturity and have a lower tree canopy. Most parcels in these neighborhoods fall into these categories and many more are considered redevelopable in the Preferred Alternative due to the new state middle housing legislation.

Table 2. Projected Canopy Coverage by Neighborhood

Neighborhood	2019			Coefficient 1*						Coefficient 2**								
	No Action			Preferred			Difference†			No Action			Preferred			Difference†		
	Parcel Acres	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	
BelRed	720	110	15%	134	19%	103	14%	-31	-4%	75	10%	63	9%	-12	-2%			
Bridle Trails	1,770	943	53%	883	50%	861	49%	-22	-1%	772	44%	616	35%	-156	-9%			
Cougar Mtn / Lakemont	1,998	1,120	56%	1,057	53%	1,075	54%	18	1%	1,025	51%	913	46%	-112	-6%			
Crossroads	714	225	31%	220	31%	202	28%	-17	-2%	209	29%	168	24%	-41	-6%			
Downtown	327	28	8%	30	9%	30	9%	0	0%	24	7%	22	7%	-2	-1%			
Eastgate	1,274	534	42%	477	37%	437	34%	-40	-3%	450	35%	372	29%	-78	-6%			
Factoria	301	63	21%	68	23%	64	21%	-4	-1%	60	20%	53	18%	-6	-2%			
Lake Hills	1,888	721	38%	699	37%	705	37%	6	0%	676	36%	587	31%	-89	-5%			
Newport	1,315	543	41%	508	39%	509	39%	1	0%	492	37%	425	32%	-67	-5%			
Northeast Bellevue	1,070	405	38%	390	36%	401	37%	11	1%	379	35%	326	30%	-53	-5%			
Northwest Bellevue	971	373	38%	356	37%	371	38%	15	2%	325	33%	303	31%	-22	-2%			
Somerset	1,148	597	52%	580	50%	578	50%	-2	0%	573	50%	519	45%	-54	-5%			
West Bellevue	1,346	612	45%	572	42%	564	42%	-8	-1%	528	39%	471	35%	-56	-4%			
West Lake Sammamish	932	438	47%	426	46%	402	43%	-23	-2%	417	45%	317	34%	-101	-11%			
Wilburton	922	378	41%	386	42%	361	39%	-25	-3%	367	40%	330	36%	-36	-4%			
Woodridge	553	248	45%	237	43%	248	45%	11	2%	224	41%	220	40%	-4	-1%			
Citywide Right of way	3,867	889	23%	889	23%	889	23%	0	0%	889	23%	889	23%	0	0%			
Total City	21,117	8,225	39%	7,912	37%	7,801	37%	-110	-1%	7,485	35%	6,595	31%	-889	-4%			

*Coefficient 1 is the average tree canopy on all parcels in each zone group (excluding parks).

**Coefficient 2 is the average tree canopy on parcels that have developed or redeveloped between 2010 and 2023.

†The difference is rounded to the nearest whole percent.

Table 3. Projected Canopy Coverage by Zone Group

Zone Group	2019			Coefficient 1*						Coefficient 2**							
	Parcel Acres	Canopy Acres	Canopy Coverage	No Action		Preferred			Difference†		No Action		Preferred			Difference†	
				Canopy Acres	Canopy Coverage	Parcel Acres	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage	Parcel Acres	Canopy Acres	Canopy Coverage	Canopy Acres	Canopy Coverage
BelRed TOD	163	18	11%	15	9%	546	50	9%	35	0%	10	6%	546	34	6%	24	0%
DT Central	189	11	6%	13	7%	259	17	6%	4	0%	8	4%	259	6	2%	-2	-2%
DT Perimeter	119	15	13%	15	13%	145	21	15%	6	2%	15	12%	145	20	14%	6	2%
Industrial	143	37	26%	34	24%	143	36	25%	2	2%	32	23%	143	35	24%	2	2%
Institutional	0	0	0%	0	0%	120	44	36%	44	36%	0	0%	120	44	36%	44	36%
Large Lot Res.	3,386	1,962	58%	1,895	56%	3,363	1,912	57%	17	1%	1,741	51%	3,363	1,472	44%	-268	-8%
Low Commercial	1,225	347	28%	370	30%	814	273	33%	-98	3%	320	26%	814	248	30%	-72	4%
Low Density Res.	436	231	53%	210	48%	444	202	45%	-9	-3%	204	47%	444	194	44%	-10	-3%
Middle Density Res.	1,051	377	36%	363	35%	885	311	35%	-52	1%	344	33%	885	297	34%	-48	1%
Middle Housing	159	79	50%	58	36%	144	65	45%	7	9%	47	29%	144	57	40%	10	10%
Middle MU	642	121	19%	139	22%	721	157	22%	18	0%	99	15%	721	120	17%	20	1%
Suburban 1 Res.	4,662	2,105	45%	1,984	43%	4,658	1,951	42%	-33	-1%	1,901	41%	4,658	1,606	34%	-295	-6%
Suburban 2 Res.	5,074	2,033	40%	1,926	38%	5,007	1,874	37%	-52	-1%	1,873	37%	5,007	1,572	31%	-301	-6%
Citywide Right of way	3,867	889	23%	889	23%	3,867	889	23%	0	0%	889	23%	3,867	889	23%	0	0%
Total City	21,117	8,225	39%	7,912	37%	21,117	7,801	37%	-110	-1%	7,485	35%	21,117	6,595	31%	-889	-4%

*Coefficient 1 is the average tree canopy on all parcels in each zone group (excluding parks).

**Coefficient 2 is the average tree canopy on parcels that have developed or redeveloped between 2010 and 2023.

†The difference is rounded to the nearest whole percent.

Table 3 above provides the results by Zone Group and illustrates that the impact of development in some Zone Groups, such as BelRed TOD for both the No Action and the Preferred Alternative is negligible. For Suburban 2 Residential, the difference in canopy with Coefficient 1 is -1%, however with Coefficient 2, the difference is -6%, between the No Action and the Preferred Alternative. For the Preferred Alternative, some Zone Groups increase in acreage, such as BelRed TOD and Downtown Center, as parcels are rezoned for higher intensity development, such as for parcels changing from Middle Density Residential to BelRed TOD. Based on the impact of current development, using Coefficient 2, the two suburban residential zoning groups (Suburban 1 Residential and Suburban 2 Residential) would have the greatest loss of tree canopy, which is consistent with the results from the 2019 and 2021 tree canopy assessments.

Summary

This analysis utilizes two approaches for projecting tree canopy at build out in 2044, for the No Action and Preferred Alternative, and illustrates a possible range of impacts to the tree canopy. This analysis uses current canopy averages by zone group and impacts from recent development to estimate the future projected canopy. For the No Action Alternative, the loss in canopy ranges from two to four percentage points in canopy. For the Preferred Alternative, the loss in canopy ranges from two to eight percentage points. The analysis does not consider the ongoing growth of the tree canopy or loss of trees due to tree health or other reasons.

For the most recent tree canopy assessments for 2019 and 2021, the overall canopy has increased slightly, despite reductions in tree canopy in certain neighborhoods and land use types. This analysis demonstrates that there would be a potential negative impact on tree canopy for both the No Action and the Preferred Alternative but does not seek to estimate how the overall growth of the tree canopy could offset reductions due to development.

Although there is potential for adverse environmental impacts to tree canopy with both the No Action and Preferred alternative, the findings from the Draft EIS under Appendix E, Plants and Animal Memo, remain unchanged. The City's existing codes, policies, plans and development regulations will continue to protect tree canopy and vegetation consistent with Bellevue's vision of a "City in a Park." Anticipated changes to Bellevue's Land Use Code and City Code, which are currently underway, will continue to support citywide tree canopy goals through updated preservation, retention, replacement, and protection regulations. Therefore, adoption of the Comprehensive Plan Periodic Update, under either the No Action or Preferred Alternative, is not expected to have a significant adverse impact on tree canopy that cannot be mitigated through application of existing development regulations that address tree replacement requirements, clustering development and preservation of large trees, continued protection of critical areas, and through additional tree planting. In addition, based on recent trends in the City, natural growth of tree canopy throughout the City will continue to offset tree canopy loss associated with permitted development. For additional information on recommendations related to tree canopy, refer to the Draft Environmental Impact Statement Appendix E, Plants and Animals Memo, and the Urban Tree Canopy Assessment, Appendix O. Finally, while some tree canopy loss in certain neighborhoods is expected under any future growth scenario, it is important to balance this with the City's other goals of increasing the economic vitality through increased access to job opportunities and

transportation, and by providing a wide range of housing to all income levels. It's also important to note that the analysis does not account for right of way plantings (i.e., street trees in parking strips), nor does it account for continued tree growth over the time between now and 2044. Additionally, this analysis calculates future conditions by current development conditions; meaning that these numbers are projecting currently known impacts, but not necessarily the actual future development outcomes. This analysis is but one element of the bigger comprehensive plan update, and the findings contained herein are intended to inform the City's long-term planning and management policy decisions consistent with the City's tree canopy protection goals.

APPENDIX N DEIS Comments and Responses

N.1 Introduction

This appendix includes responses to common comments received on the Draft Environmental Impact Statement (DEIS). The DEIS was issued on April 27, 2023, and included a 45-day comment period, which ended on June 12, 2023. A virtual public meeting was held on Thursday May 18, 2023. Two in-person meetings were held on May 23 and June 1, 2023. During the DEIS comment period, comments were submitted through public testimony at the DEIS meetings and written comments, including email and electronic submission to the project website.

Responses to comments provided in this appendix address environmental issues raised during the public comment period for the DEIS. A response is provided for each comment. The responses are intended to provide clarification and refinement of information presented in the DEIS and, in some cases, to correct or update information in the EIS. The text of the EIS has been revised as appropriate in response to comments and to reflect new or updated information, and the revised text has been incorporated into the Final EIS (FEIS).

Comments and responses to comments are organized and presented in the following sections of this appendix:

- Section N.2, *List of All Commenters*.
- Section N.3, *Responses to Common Comments*.
- Section N.4, *Responses to Specific Comments from Individuals, Organizations, and Tribes*.

N.2 List of All Commenters

Table N-1 lists the comments received on the DEIS. Copies of these letters and responses. Note that the comment letters may not be sequential as duplicate letters have been removed.

TABLE N-1 All Commenters

Comment Letter No.	Submitter	Comment Letter No.	Submitter
FLA-1	John Wu	FLC-1	Liberty Quihuis
FLA-2	Liangwei Ge	FLC-2	Liberty Quihuis
FLA-3	Ligeng Dong	FLC-3	Liberty Quihuis
FLA-4	Ping Jia	I-1	Chris Bendix
FLA-5	Steve Engen	I-2	Patsy Neher
FLA-6	Tammy Miller	I-3	Simon Zhang
FLA-7	Phyllis White	I-4	Roy McMurtrey
FLA-8	Lee White	I-5	James Adcock
FLA-9	Ying Wang	I-6	Francis Tsang
FLA-10	Zihong Guo	I-7	Mark Nash
FLA-11	Jiang Wu	I-8	David Woosley
FLA-12	Ying jiang	I-9	Al Dietemann
FLA-13	Luming Wang	I-10	Stanley Xu
FLA-14	Yan Wang	I-11	Chirag Khatri
FLA-15	William Wang	I-12	Patsy Neher
FLA-16	Jianxia Gao	I-13	Miriam Matson
FLA-17	Chuyong Fu	I-14	Mark Leingang
FLA-18	Jun Wang	I-15	Paul Perkins
FLA-19	Sachin Lande and Naha Lande	I-16	Sherri Anderson
FLB-1	Pamela Johnston	I-17	Steven DeMonnin
FLB-2	James Bowles	I-18	Mayank Saxena
FLB-3	Mel Levine	I-19	B Henderson
FLB-4	Pamela Johnston	I-20	Nima Foroutan
FLB-5	Pamela Johnston	I-21	Todd Stabler
FLB-6	Pamela Johnston	I-22	Joe Cooledge
FLB-7	Rebecca Kinnestrand	I-23	Barb Braun
FLB-8	Pamela Johnston	I-24	Vicki Rauscher
FLB-9	Alison Cole	I-25	Cristina Dugoni

Comment Letter No.	Submitter	Comment Letter No.	Submitter
I-26	Natalie De Maar	I-60	Zhenhai Zhang
I-27	Jeannie Mucklestone	I-30	Starla Schwartz
I-28	Michael Kenny	I-31	Ruth Lipscomb
I-29	Elham Morshedzadeh	I-32	David Plummer
I-30	Starla Schwartz	I-33	Joe Cooledge
I-30	Starla Schwartz	I-34	Micki Larimer
I-31	Ruth Lipscomb	I-35	Steven Demonnin
I-32	David Plummer	I-36	Barbara Hughes
I-33	Joe Cooledge	I-37	John Whitney
I-34	Micki Larimer	I-38	Hope Barker
I-35	Steven Demonnin	I-40	Sue Harms
I-36	Barbara Hughes	I-41	Dale Scott
I-37	John Whitney	I-42	John Van Duzor
I-38	Hope Barker	I-43	Karen Mauden
I-40	Sue Harms	I-44	Jungwook Bae
I-41	Dale Scott	I-45	David Plummer
I-42	John Van Duzor	I-46	Evan Lee
I-43	Karen Mauden	I-47	Tenzin Zhedon
I-44	Jungwook Bae	I-48	Sander Valstar
I-45	David Plummer	I-49	Brooke Mosby
I-46	Evan Lee	I-50	David Plummer
I-47	Tenzin Zhedon	I-51	Nathan Campbell
I-48	Sander Valstar	I-52	Ryder Wiess
I-49	Brooke Mosby	I-53	Kathleen McKenna
I-50	David Plummer	I-54	Caroline Smith
I-51	Nathan Campbell	I-55	Timber Solomon
I-52	Ryder Wiess	I-56	Alexander Tran
I-53	Kathleen McKenna	I-57	David Goodwin
I-54	Caroline Smith	I-58	Benjamin Bird
I-55	Timber Solomon	I-59	Nelly Schaffner
I-56	Alexander Tran	I-60	Zhenhai Zhang
I-57	David Goodwin	I-61	Madeleine Wiley
I-58	Benjamin Bird	I-62	Christopher Kinsella
I-59	Nelly Schaffner	I-63	Leonardo Barros Barreto

Comment Letter No.	Submitter	Comment Letter No.	Submitter
I-64	Xintong Bi	I-98	Lisa Olsen
I-65	Jennifer Hammond	I-99	Garth Olsen
I-66	Steve Kunkel	I-100	Sean Mobley
I-67	Steve Kunkel	I-101	john cooper
I-68	Laura Millikan	I-102	Paula Fuld
I-69	Katherine Nye	I-103	Jean Chauhan
I-70	Karla Gonzalez	I-104	Dale Roberts
I-71	Lisa Tsang	I-105	Larry Hubacka
I-72	Susan Scanlan	I-106	Larry Hubacka
I-73	April Atwood	I-107	Stephanie Parsons
I-74	Laura Balent	I-108	Julie Tzucker
I-75	Howard Edwards	I-109	Lucy C
I-76	Steve Jamieson	I-110	LeeAnn Stivers
I-77	Paul Nienaber	I-111	Zhanbing Wu
I-78	William Baker	I-112	Cheryl Wang
I-79	Svetlana Verthein	I-113	Ching-Chao Wang
I-80	Ann Jackson	I-114	Kate Sayers
I-81	Ziad Kalthoum	I-115	Teresa Doyle
I-82	James Richardson	I-116	Tom Schwartz
I-83	Cassidy Isaacson	I-117	Rituja Kapoor
I-84	John Taylor	I-118	April Stevens
I-85	Steven DeMonnin	I-119	Deven Tokuno
I-86	Emelia Hartford	I-120	Scott Fisher
I-87	Fengling Cheng	I-121	Julie Beffa
I-88	Rachel Hauser	I-122	Yuhua Ding
I-89	Aicha Lahmoudi	I-123	Randolph Haagens
I-90	Farrah Harold	I-124	Virginia Miller
I-91	Grace Carnes	I-125	Billis Helg
I-92	Allen Barhudarian	I-126	Charlie Bauman
I-93	Sue Harms	I-127	Chris Langer
I-94	Virginia Skordal	I-128	Christine Hemnes
I-95	Cindy Meinecke	I-129	David Plummer
I-96	Tim Powell	I-130	Elaine Anthonise
I-97	Ken Stoner	I-131	Elizabeth Anderson

Comment Letter No.	Submitter	Comment Letter No.	Submitter
I-132	Jennifer Wang	I-166	Robert Butenko
I-133	Joe Razore	I-167	Albert Ting
I-134	John Darvish	I-168	Andrey Proskurin
I-135	Kamran Marashi	I-169	Linda Edson
I-136	Karl Helmgren	I-170	Ann Surbridge
I-137	Martha Freitag	I-171	Austin Ross
I-138	MaryJo Acker	I-172	Eric Adams
I-139	Pat Amador	I-173	Gary Saaris
I-140	Sarah Pimorese	I-174	Gaurav Bansal
I-141	Sue Harms	I-175	Pinda Bazley
I-142	Thomas Colombo	I-176	Kristen Bryant
I-143	Barbara Braun	I-177	Jack Hirsch
I-144	Steve Williams	I-178	Dale Hutson
I-145	T.J. Woosley	I-179	Lisa Peterson
I-146	Pamela Johnston	I-180	Jennifer Keller
I-147	Karen Yellman	I-181	Heidi Behrens-Benedict
I-148	Pamela Johnston	I-182	Karrin Dobbe
I-149	Pamela Johnston	I-183	Kristi Weir
I-150	Skip Slavin	I-184	Leslie Geller
I-151	William Barnes	I-185	Lily Yin
I-152	Chris Marks	I-186	Melinda Hirsch
I-153	William Marks	I-187	Mike Bogin
I-154	Glenn Kalmus	I-188	Natalie Duryea
I-155	David Cagle	I-189	Norman Baullinger
I-156	Roger White	I-190	Troy Schmeil
I-157	Barbara Hughes	I-191	Debbie Lacy
I-158	Betsi Hummer	I-192	Reiner Decher
I-159	C Paul Johnson	I-193	Renzee Sto Tomas
I-160	Candice Boyd	I-194	Stuart Heath
I-161	David Plummer	I-195	Tom Wicherath
I-162	Leslie Geller	I-196	Wilson Wu
I-163	Cindy Xintong Bi	I-197	Toni Vincent
I-164	Claire Sumadiwirya	I-198	Susie Goett
I-165	Dan Choi	I-199	Sherry Schwab

Comment Letter No.	Submitter	Comment Letter No.	Submitter
I-200	Richard Hughes	I-205	Nancy Jacobs
I-201	Phyllis White	I-206	Michal Makar
I-202	Eduardo Rodriguez	I-207	Maria Lau Hui
I-202	Eduardo Rodriguez	I-208	Loretta Lopez
I-203	Norman Hansen	I-209	Linda Shulman
I-204	Nicole Myers	I-210	Kristine Linn
I-205	Nancy Jacobs	I-211	Karen Morris
I-206	Michal Makar	I-212	Heidi Dean
I-207	Maria Lau Hui	I-213	Fengxi Luan
I-208	Loretta Lopez	I-214	Curt Allred
I-209	Linda Shulman	I-215	Karen Yellman
I-210	Kristine Linn	I-216	Nicole Myers
I-211	Karen Morris	L-1	Richard Gelb
I-212	Heidi Dean	L-2	Amy Tousley
I-213	Fengxi Luan	M-1	The nine commenters from the May 18, 2023, Virtual Public Comment Meeting are listed in Table N-2
I-214	Curt Allred	M-2	The nine commenters from the June 1, 2023, In-Person Public Comment Meeting are listed in Table N-2
I-215	Karen Yellman	M-3	The seven commenters from the May 23, 2023, In-Person Public Comment Meeting are listed in Table N-2
I-216	Nicole Myers	O-1	Alicia Hoppers
I-190	Troy Schmeil	O-2	Sheli Hadari
I-191	Debbie Lacy	O-3	Don Marsh
I-192	Reiner Decher	O-3	Don Marsh
I-193	Renzee Sto Tomas	O-4	Jacque Quarre
I-194	Stuart Heath	O-5	Tobi Maggi
I-195	Tom Wicherath	O-6	Tobi Maggi
I-196	Wilson Wu	O-7	F J Pane
I-197	Toni Vincent	O-8	Emma Carlblom
I-198	Susie Goett		
I-199	Sherry Schwab		
I-200	Richard Hughes		
I-201	Phyllis White		
I-202	Eduardo Rodriguez		
I-202	Eduardo Rodriguez		
I-203	Norman Hansen		
I-204	Nicole Myers		

Comment Letter No.	Submitter	Comment Letter No.	Submitter
O-9	Christopher Randels	O-23	LeeAnn Guidotti
O-10	Leshya Wig	O-24	Mariya Frost
O-11	Alicia Hoppers	O-25	Lex Wieneke
O-12	Stanley Xu	O-26	Jessica Clawson
O-13	Willam Anderson	O-27	John Stout
O-14	Todd Woosley	O-28	Jon Yearsley
O-15	Jonathan Tran	O-29	Brian Franklin
O-16	Greg Russell	O-30	Adam Rosen
O-17	Kristi Weir	O-31	Brandon Burrowes
O-18	Sandy Sternoff	O-32	Amelia Westling
O-19	Kirk Matthewson	O-33	Divya Kapuria
O-20	Jason Espiritu	O-34	Douglas Rigoni
O-21	Kevin Wallace	O-35	Wende Miller
O-22	Gardner Morelli	O-36	Keyvan Naficy
O-23	LeeAnn Guidotti	O-37	Abigail DeWeese
O-24	Mariya Frost	O-38	Mark Craig
O-25	Lex Wieneke	O-39	Abigail DeWeese
O-26	Jessica Clawson	O-40	Erin Powell
O-27	John Stout	O-41	Erin Kenway
O-28	Jon Yearsley	O-42	Conor Hansen
O-29	Brian Franklin	O-43	Jacquie Quarre
O-30	Adam Rosen	O-44	Ed Segat
O-31	Brandon Burrowes	O-45	Jane Blair
O-32	Amelia Westling	O-46	Sean Thorson
O-33	Divya Kapuria	O-47	John Hogan
O-34	Douglas Rigoni	O-48	Judith Hoyle
O-35	Wende Miller	O-49	Camille Walton
O-36	Keyvan Naficy	O-50	Jodie Alberts
O-37	Abigail DeWeese	O-51	Pearl Leung
O-38	Mark Craig	O-52	Pamela Johnston
O-39	Abigail DeWeese	O-53	Pamela Johnston
O-20	Jason Espiritu	O-54	John McCullough
O-21	Kevin Wallace	O-55	Lara Gardner
O-22	Gardner Morelli	O-56	Matt Jack

Comment Letter No.	Submitter	Comment Letter No.	Submitter
O-57	Ryan Donohue	O-58	Victor Bishop
O-58	Victor Bishop	O-59	Whit Hamlin
O-59	Whit Hamlin	O-60	Court Olson
O-44	Ed Segat	O-61	Nicole Garza
O-45	Jane Blair	O-62	Neal Mulnick
O-46	Sean Thorson	O-63	Neal Mulnick
O-47	John Hogan	O-64	Neal Mulnick
O-48	Judith Hoyle	O-65	Kristi Beckham
O-49	Camille Walton	O-66	Kacie Coselman
O-50	Jodie Alberts	O-67	Jesse Simpson
O-51	Pearl Leung	O-68	Jack McCullough
O-52	Pamela Johnston	O-69	Guillermo Rivera
O-53	Pamela Johnston	O-70	Danielle Duvall
O-54	John McCullough	O-71	Brian Parks
O-55	Lara Gardner	O-72	Brady Nordstrom
O-56	Matt Jack	T-1	Nancy Sackman for the Duwamish Tribe
O-57	Ryan Donohue		

Bellevue held three public meetings and received verbal comments submitted by a total of 25 individuals, as listed in **Table N-2**: nine individuals commented at the May 18, 2023, Virtual Public Comment Meeting; nine at the June 1, 2023, In-Person Public Comment Meeting; and seven at the May 23, 2023, In-Person Public Comment Meeting. Refer to Section N.4—Comment Letters M-1, M-2, and M-3, respectively—for the meeting transcripts of the verbal comments received, with the responses alongside the comments.

TABLE N-2 Public Meeting Commenters

Name	Email	Address
MAY 18, 2023, VIRTUAL PUBLIC MEETING COMMENTERS		
Clifford Cawthorn	cliff.cawthorn@habitatske.org	500 Naches Ave SW Ste 200 Renton, WA 98057
T.J. Woosley	todd@woosleyproperties.com	3015 124th Ave NE Bellevue, WA 98005
Jacquie Quarre	jacquie@tharsis.land	285 SE 10th Cir North Bend, WA 98045
Prof Brown		2660 118th Ave SE Bellevue, WA 98005
Sten Leszynski		
Stanley Xu	Stanley.Xu@LongwellCompany.com	14400 NE Bel-Red Rd Ste 204 Bellevue, WA 98007
Phyllis White	phyllisjwhite@comcast.net	511 Boren Ave N Ste 300 Seattle, WA 98109
Jasper Lee		1057 134th Ave NE, Bellevue, WA 98005
Steve Williams	swilliams453@yahoo.com	12634 SE 4th Pl, Bellevue, WA 98005
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Alia Atwell		541 166th Ave NE Bellevue, WA 98008
Matt Gardner		161 165th Ave NE Bellevue, WA 98008
Loretta Lopez	ljlopezmsl@gmail.com	6619 132nd Ave NE #193 Kirkland, WA 98033

N.3 Responses to Common Comments

Comments received were broad in scope and topic, yet several main themes emerged in the comments. These 22 major comment themes are summarized in **Table N-3**, and the City’s responses to them follow. Responses to many of the individual comments in Section N.4 refer to one or more of these common responses.

TABLE N-3 Topics of Common Comments

Common Response No.	Topic/Issue	Page
1	Non-Project EIS vs. Project-Level State Environmental Policy Act (SEPA) Review	N-11
2	Tree Canopy	N-11
3	Water Quality	N-12
4	Housing Alternatives	N-13
5	Assumption of Build-out	N-14
6	Noise	N-15
7	Parks and Open Space	N-15
8	Air Quality/Greenhouse Gas (GHG)	N-16
9	Plants and Animals	N-17
10	Wilburton Street Grid	N-18
11	Impact of COVID-19	N-18
12	Impacts of Climate Change	N-18
13	Growth Targets	N-19
14	Equity and Environmental Sustainability Metrics	N-19
15	Climate Change and State Planning Framework	N-20
16	Critical Areas	N-20
17	BelRed Street Grid	N-20
18	Future Land Use Categories	N-21
19	Zoning Details	N-21
20	Phantom Lake	N-22
21	Stormwater Infrastructure	N-22
22	Mitigation Measure Requirements	N-22

1. NON-PROJECT EIS VS. PROJECT-LEVEL SEPA REVIEW

This document is a non-project EIS that analyzes the environmental impacts of the proposed growth alternatives broadly across the study area. The EIS also identifies potential mitigation for the environmental impacts associated with the proposed growth alternatives. 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 the site-specific analysis that occurs during project level environmental review.

Although this non-project EIS analyzes the environmental impacts associated with the growth alternatives and identifies potential mitigation for those impacts, additional environmental review may occur as other project or non-project actions are proposed in the city in the future. In situations where a specific project-level proposal is not exempt from SEPA, future project-level environmental review could occur in the form of an EIS, a supplemental EIS, SEPA addendum, or determinations of non-significance as needed.

2. TREE CANOPY

See DEIS Appendix E, *Plants and Animals Memorandum*, page 4, Tree Canopy. Bellevue has been analyzing the tree canopy using aerial imaging every 5 to 10 years since 1986. Up-to-date data on tree canopy cover and impervious surfaces allow the city to make informed decisions about tree planting and preservation, stormwater management, land use and the benefits trees provide. Development in Bellevue over the last 70 years has resulted in the loss of trees from farming, mining, and logging as well as residential and commercial development. However, recent analysis has shown a slow but steady increase in the tree canopy.

DEIS Appendix E outlines opportunities to enhance the tree canopy such as requirements for developers to add trees through application of the city's development regulations, and potential city implementing regulations, which, if adopted by the City Council, could require clustered development and preservation of large trees.

Bellevue's tree canopy is a critical environmental asset and central to the vision of a "City in a Park." The city has a monitoring program and existing policies to support the retention and expansion of the tree canopy. Based on policy direction in the current Comprehensive

Plan and in the Environmental Stewardship Plan, the city could adopt amendments to Bellevue's Land Use Code and City Code to update tree preservation, retention, replacement, and protection provisions to better support citywide tree canopy goals.

As part of the city's regular assessment of the tree canopy, the city recently updated its tree canopy assessment using the most up-to-date methodologies and analyzed tree canopy for both 2011 and 2019. This report can be found in FEIS Appendix O, *Urban Tree Canopy Assessment*. This assessment shows Bellevue's overall tree canopy at 39%, and highlights neighborhoods with net losses of tree canopy and others with tree canopy increases. The City of Bellevue has gained 2% or 411 acres of urban tree canopy since 2011. Twenty-two percent of the land is classified as possible planting area. The areas designated as parks had the highest Urban Tree Canopy, with 72% of all park area covered by tree canopy.

In response to DEIS comments asking for more analysis of the impact of potential future development on the tree canopy, the FEIS also includes additional analysis of tree canopy from the standpoint of the No Action and the Preferred Alternative. This report can be found in the FEIS Appendix M, *Impact of Growth Alternatives on Tree Canopy, Technical Report*.

3. WATER QUALITY

DEIS Appendix F, *Water Memorandum*, provides a broad overview of protected water resources within the City of Bellevue for the purposes of future planning. Individual projects will continue to be subject to review under and compliance with the laws described in the memorandum, and project level environmental review under SEPA will continue to occur for non-exempt development proposals. The Comprehensive Plan Periodic Update and Wilburton Vision Implementation are governmental actions involving decisions on policies, plans, or programs that contain standards controlling the use or modification of the environment, which are non-project, rather than project level, actions under SEPA. The Comprehensive Plan proposes to contain growth in an urban area per the Growth Management Act (GMA) and protect water resources through city codes. 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 impacts on water resources.

However, those projects will continue to be subject to existing federal and state laws, as well as local regulations, including the Clean Water Act, state regulations protecting Waters of the State, the Shoreline Management Act, the Shoreline Master Program, Bellevue City Codes, Bellevue's Critical Area Ordinance, Ecology 303(d) list, Bellevue stormwater regulations, policies in the city's current Comprehensive Plan, and underlying land use permit review processes and regulations. Detailed site-specific analyses of the potential environmental impacts resulting from development proposals occurs during the city's project-level review, and specific development proposals and project permit applications submitted to the city will remain subject to the above-noted federal and state laws and city regulations, which address required avoidance, minimization, and/or mitigation measures.

4. HOUSING ALTERNATIVES

The DEIS analyzed three action alternatives that provide a range of capacities for growth, a variety of housing types, and several tools to create affordable housing. The EIS also analyzes various approaches for providing housing opportunities to renters and homeowners, and it identifies potential mitigation for the environmental impacts associated with the action alternatives.

The FEIS analyzes a Preferred Alternative that includes a housing strategy that incorporates a variety of housing types, including middle housing options like townhomes, duplexes, cottage housing, and other low-density typologies permitted across the city. Additional low-density, middle housing typologies allowed in single-family areas of the city may also improve affordable homeownership opportunities. The Preferred Alternative focuses on equitably providing middle-scale housing across the city.

The FEIS also provides analysis of environmental impacts related to the city's implementation of the requirements in House Bill (HB) 1110 and HB 1337. HB 1110 requires cities like Bellevue to change local comprehensive plans and development regulations to allow in residential areas up to four housing units per lot (six per lot within ¼-mile walk of a major transit stop or when two units are affordable) in a variety of housing types. HB 1337 requires Bellevue to update its Comprehensive Plan and its development regulations regulating attached and detached accessory dwelling units. Additional details related to rental and homeownership opportunities would be determined through the growth strategy and Comprehensive Plan policy update processes.

The FEIS also includes an analysis of the impact of a mandatory affordable housing program and a voluntary affordable housing program on the creation of affordable housing in the city. This analysis can be found in FEIS Appendix L, *Bellevue Housing Economic Analysis, Phase 1*. The analysis concludes that mandatory inclusionary zoning programs appear to be more successful overall but that the effectiveness of all programs often depends on location and policy type. Several case studies in the report can help to inform the specifics of the housing programs so that they work for Bellevue’s situation.

Calculating capacity for affordable housing specifically is not part of the scope of the EIS. However, calculating capacity for affordable housing is required as part of the update to the Comprehensive Plan under GMA. This is a new requirement that was added in HB 1220 and will be included in the Comprehensive Plan. A discussion of housing affordability and the capacity for affordable housing can be found in FEIS Section 7.2.1. Additional information on housing affordability and also emergency housing can be found in FEIS Appendix Q, *Bellevue Emergency Housing Land Capacity Analysis*, and Appendix R, *Bellevue Affordable Housing Capacity Analysis, Technical Report*.

5. ASSUMPTION OF BUILD-OUT

The EIS analyzes the potential environmental impacts under a build-out scenario. This is a conservative approach, consistent with SEPA, which means that the growth analyzed in all of the alternatives may happen after the 2044 planning horizon for the Comprehensive Plan. The calculation of informed build-out is based on the guidance King County provided for the urban growth capacity calculations for the Urban Growth Capacity Report published in 2022. The assumptions of the future land use designations are more general as future land use designations in the Comprehensive Plan may contain more than one zoning district. The assumptions, including assumptions about floor area ratio (FAR) and unit count and size, are broad across the city and not binding to specific sites. They are not zoning maximums or the basis for height and form regulations.

For all of the alternatives, the growth targets remain 35,000 new housing units and 70,000 new jobs by 2044. By analyzing the build-out scenario, the EIS documents the full extent of potential environmental impacts regardless of when they would occur.

6. NOISE

A number of DEIS comments expressed concern that requiring an interior noise level of 40 A-weighted decibels (dBA) for sleeping areas or 45 dBA for nonsleeping areas in residential development would place an unfair cost burden on some areas within Bellevue and that the interior noise requirements should be uniform throughout the city.

Bellevue Municipal Code Section 9.18.045B Development Restrictions establishes an interior noise standard applicable to all development within the city. Specifically, new residential structures shall not be approved for construction if the exterior day-night average noise level (Ldn) anywhere along the proposed building lines of the structure exceeds 65 dBA unless sound attenuation measures are incorporated into the site design and/or the design and construction plans of the structure which are intended to reduce the maximum interior Ldn to 40 dBA or lower for sleeping areas and 45 dBA or lower for nonsleeping areas. Consequently, the interior noise requirements within the City of Bellevue are applicable to all areas within the city where exterior noise exceeds 65 dBA, Ldn.

Additionally, the costs associated with meeting the interior standard have been a requirement since the ordinance was adopted into the City Code in 2007.

The city has considered future amendments to the noise code in the 2024 work plan, which may address some of the areas noted above. That process would include engagement with the community prior to action by the City Council. Amendments to the city noise code that are consistent with regulations adopted by the Department of Ecology are categorically exempt from SEPA review (Washington Administrative Code [WAC] 197-11-800(21), but even if exempt from SEPA, the city's legislative process provides notice and an opportunity for public participation prior to adoption.

7. PARKS AND OPEN SPACE

The environmental impacts on Parks and Open Space are described in DEIS Chapter 10, *Public Services and Utilities*. Planning for parks and open space will take place as part of the Comprehensive Plan Periodic Update and future updates to Bellevue's Parks and Open Space System Plan. DEIS Chapter 10 pages 10-7 to 10-11 describe the regulatory framework of the city's parks and open space system. As noted on page 10-9, the preservation of open space and development of the park and trail system in Bellevue are guided by two primary documents: the Bellevue Comprehensive Plan, and the

2022 Parks & Open Space System Plan. The latter is the primary tool used to guide the long-term growth and development of the city's parks and open space system, which identifies 20-year capital project objectives, and funding to implement long-term recommendations are determined through the Capital Investment Program budgeting process. The DEIS analysis on page 10-23 concludes that the city would rely on the Parks & Open Space System Plan future updates and funding to accommodate increased population needs for parks and recreation spaces under all of the alternatives, and no significant unavoidable adverse impacts are expected. A potential mitigation measure identified for parks and open space found on DEIS page 10-29 includes exploring opportunities to develop new parks, open space, and recreation facilities, especially in the northern portion of the city, to address the 1/3-mile gap in access.

While site-specific information such as future parks, greenspace, and dog park locations are outside the scope of analysis for this EIS, the current Comprehensive Plan includes support for providing access to open space and enhancing people's ability to access parks and other amenities close to home. The Parks & Open Space System Plan, in turn, takes the broad vision, goals, and policies in the Comprehensive Plan and outlines the plan to meet those goals, in association with other plans and initiatives. These include goals and policies related to level of service standards to meet future population growth, identification, and funding for future parks and open spaces. Additional environmental review will occur as other project or non-project actions related to parks and open space are proposed in the city in the future. Future site-specific parks and open space facilities would undergo additional SEPA review in connection with project level review of those facilities.

8. AIR QUALITY/GHG

Air quality is addressed in the DEIS and the FEIS in Chapter 8, and the DEIS includes Appendix J, *Air Quality and Land Use Planning Report*. Chapter 8 identifies short-term, potentially significant adverse impacts that are common to all of the alternatives related to air quality and GHG from construction activities. The chapter also identifies potentially significant impacts on air quality and GHG emissions at build-out under any of the Action Alternatives, although it notes that build-out is not expected by 2044.

DEIS Chapter 8 also analyzes air quality in close proximity to high-volume roadways, which may result in degraded air quality due to nearby emissions of diesel particulate matter, air toxics, and tire and

brake wear. Based on the information and methodology included in the DEIS, the concentrations of these pollutants are highest between 300 and 1,500 feet of high-volume roadways.

Many mitigation measures are identified in DEIS Chapter 8 and in DEIS Appendix J. Buffers are one measure to reduce cancer risk associated with near-roadway emissions exposures. Other measures include requiring filtration systems in buildings, enhancing the air quality monitoring system in Bellevue, reducing vehicle miles traveled, and encouraging the use of electrified vehicles. The city may implement some, all, or none of the mitigation measures. The city may also take measures not identified in this chapter to improve air quality in the city.

The EIS also provides an analysis of how vehicle miles traveled is expected to change with the alternatives and incorporates the changes to the vehicle technologies expected in future years due to existing regulations.

9. PLANTS AND ANIMALS

DEIS Appendix E provides information on plants and animals. The city requested a memorandum 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.

The Comprehensive Plan Periodic Update is a non-project action that does not include a physical project proposal, and with application of the city's codes, standards, and regulations designed to protect plants and animals, the growth alternatives analyzed in the EIS are not expected to result in significant adverse environmental impacts on vegetation and wildlife habitat, threatened and endangered species, or 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. To the extent that future site-specific development projects could result in environmental impacts on vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands, those projects will continue to be subject to existing codes, standards, and regulations that protect vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands.

10. WILBURTON STREET GRID

Additional qualitative analysis of the street grid is included in EIS Chapter 11, *Transportation*. There is an analysis of a street grid that focuses on flexible, local access and active transportation modes with through-block connections. Although additional refinements of the internal access needs for the Wilburton study area may be completed as part of future code and policy updates, the result will be a similar permutation of the street grid studied; and it is not anticipated that this refinement will result in substantial changes to the alternatives and environmental impacts disclosed and analyzed in the FEIS. Further review of the street grid will be undertaken at the project-level review stage.

11. IMPACT OF COVID-19

The full impacts of the COVID-19 pandemic are still being evaluated and understood. The analysis in the EIS uses the most current information about work-from-home trends, commuting trends, and housing trends to analyze impacts of the alternatives.

12. IMPACTS OF CLIMATE CHANGE

The DEIS included Appendix G, *Relationship of Climate Vulnerability to the Alternatives*, which documents risks of climate change and potential strategies to address those risks. Climate projections for the assessment were obtained from the University of Washington's Climate Impacts Group. The Bellevue Climate Vulnerability Index (CVI) has been 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.

The risk of wildfires increasing west of the Cascades as a result of climate change is low, but the risk of smoke will increase as regional wildfires will likely increase in frequency and intensity. No one location in the city is more at risk from smoke; rather, individuals with existing respiratory and cardiovascular issues and those living in substandard housing with inadequate filtration will be more at risk.

Since the DEIS was issued, a climate vulnerability assessment was completed and is included as FEIS Appendix P, *Climate Vulnerability Assessment*.

13. GROWTH TARGETS

The growth targets are based on population projections developed by Washington State's Office of Financial Management, which consider changes in age cohort distribution as well as net migration. The growth targets were developed in coordination with King County, other King County cities, and the Puget Sound Regional Council (PSRC) as required by the state GMA.

As described in DEIS Chapter 2, *Alternatives*, Section 2.3.2, *Regulatory Framework*, the City of Bellevue's Comprehensive Plan Periodic Update must meet all of its responsibilities under the GMA and King County Countywide Planning Policies (CPPs), which sets housing unit and job targets. The 2019-2044 growth targets set by the CPPs for Bellevue are 70,000 new jobs and 35,000 new units, regardless of the alternative studied. Please refer to the King County Countywide Planning Policies for more information on how the growth targets were developed.

As stated in DEIS Chapter 2, page 2-13, 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."*

14. EQUITY AND ENVIRONMENTAL SUSTAINABILITY METRICS

The DEIS included 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.

15. CLIMATE CHANGE & STATE PLANNING FRAMEWORK

Governor Inslee signed into law HB 1181 on May 3, 2023. The bill adds additional requirements for planning in Washington State related to reducing the causes and impacts of climate change. One of the new requirements is a new element titled “Climate Change.” The city is not required to adhere to the requirements set forth in HB 1181 until 2029.

The Washington State Department of Commerce still needs to provide guidance to cities like Bellevue, with the 2029 implementation schedule, regarding how best to implement the provisions in the bill. As a result, it would be premature at this time to consider city adoption of the specific requirements set forth in HB 1181, although the city has nonetheless considered climate vulnerability in connection with the environmental review for the Comprehensive Plan Periodic Update and will continue to consider climate vulnerability in connection with other city planning initiatives.

For example, since the DEIS was issued, a climate vulnerability assessment was completed and is included as FEIS Appendix P, *Climate Vulnerability Assessment*.

16. CRITICAL AREAS

Critical areas are excluded from development in the land use model used to analyze impacts. Although the EIS identifies potential mitigation for environmental impacts associated with the proposed growth alternatives, analysis of environmental impacts associated with specific changes to the city’s Critical Areas Code, Part 20.25 Land Use Code (LUC), is outside the scope of the EIS. Environmental review under SEPA will be required and conducted when the city’s Critical Areas Ordinance is updated consistent with best available science, but this EIS does not review potential amendments to the text of the city’s critical areas regulations.

17. BELRED STREET GRID

The policy intent of the planned BelRed street grid is to create new streets around small blocks that provide vehicle access to parcels that are being redeveloped and to ensure excellent pedestrian and bicycle

access to these parcels. While some linkages may not be appropriate for vehicular access, the planned street grid provides a framework for local connectivity for pedestrians and bicyclists (S-BR-51, S-BR-56). The policy intent of the planned BelRed street grid is also to provide a framework for incorporating natural drainage practices, planting new street trees, and landscaping, and other opportunities to enhance the natural and built environment where appropriate, effective, and feasible (S-BR-52, S-BR-56, S-BR-59, S-BR-61). Following the update to the Comprehensive Plan, the Land Use Code may be updated consistent with the updates to policies in the Comprehensive Plan, Volume 1, and the Neighborhood Area Plans in Volume 2.

18. FUTURE LAND USE CATEGORIES

The Future Land Use Maps in the EIS reflect the land use that was studied in the EIS. The Future Land Use Map that is adopted as part of the Comprehensive Plan may use the same categorization method or may use a different method. Opportunities to broaden the future land use categories are being assessed as part of the update. However, the environmental analysis in the EIS will inform that city decision, and it is anticipated that the environmental impacts associated with that decision will be consistent with the analysis provided and impacts disclosed in the EIS.

19. ZONING DETAILS

This non-project EIS analyzes potential future land use classifications at buildout. The analysis of specific zoning details for zones or overlay districts is outside of the scope of the EIS. This level of detail and the attendant Land Use Districts in the city is addressed through the city's Land Use Code, rather than through the Future Land Use Map included in the Comprehensive Plan. The details regarding allowable uses and development regulations are codified in Bellevue Land Use Code (Title 20), which governs permitted uses and site planning. In addition, the analysis of property-specific details such as height or massing, parking, tree retention, or the mix of uses on a parcel is outside the scope of this EIS. The analysis of environmental impacts associated with specific development agreements, which are project level and property-specific, is also outside of the scope of this EIS. The future development restrictions may or may not meet the buildout maximums studied in this EIS.

New or revised zoning and development regulations associated with the Comprehensive Plan Periodic Update will occur after the FEIS is issued. The potential mitigation for the environmental impacts

associated with the proposed growth alternatives identified and studied in the EIS may be incorporated into those updated city regulations. Edits to the Comprehensive Plan Land Use Map and any amendments to the text of the Land Use Code will be the subject of additional public meetings and hearings by the Planning Commission and City Council, consistent with the GMA and the local land use process required by the Land Use Code.

20. PHANTOM LAKE

It is true that the 1986 Kramer Chin & Mayo report provided a maximum depth of 54 feet. This report was issued almost 40 years ago. More recently, however, the maximum depth has been reported anywhere from 45 to 47 feet based on global positioning system (GPS) nautical charts. The more recent GPS information was provided in the DEIS Appendix E. The depth of the lake does not change the conclusions in Appendix E.

Appendix E does not state that Phantom Lake is a wetland. It states that some people view it as a wetland. Phantom Lake would not be considered a wetland based on the definition in the GMA (Revised Code of Washington [RCW] 36.70A.030) although it may be adjacent to wetlands.

21. STORMWATER INFRASTRUCTURE

The City of Bellevue operates under a federal National Pollutant Discharge Elimination System (NPDES) permit from the Washington Department of Ecology that prioritizes Low-Impact Development (LID) approaches to stormwater management. The city also has a Stormwater Management Plan, and policies in the Comprehensive Plan that emphasize LID and other green infrastructure approaches.

22. MITIGATION MEASURE REQUIREMENTS

The mitigation measures and recommendations in the EIS are not required to be implemented. Impacts are disclosed, and mitigation measures and recommendations are offered. The city may adopt some, all, or none of the mitigation measures and recommendations in the EIS. These mitigation measures and the environmental analysis included in the EIS could be incorporated into the Comprehensive Plan or into adopted development regulations.

N.4 Responses to Specific Comments from Individuals, Organizations, and Tribes

N.4.1 Form Letters or Duplicate Submittals

In addition to the hundreds of original comments the city received on the DEIS, Bellevue received three letters from individuals that were then duplicated by others. While some commenters modified the form letter to express their desire for one alternative or another, they are all similar in their content. As a result, the city has not published all submittals for the form letters as part of the FEIS; rather, the city has responded once to each of the three form letters. Details of the form letters are as follows, and individuals who submitted copies of the form letters or endorsed the contents of the letters are listed in **Table N-4**:

- **Form Letter A (FLA).** Nineteen form letter emails were submitted by individuals through Wilburton Community Association. Although some commenters modified the form letter to express their desire for one alternative or another, they are all similar in their content. Refer to Comment Letter FLA-1 for copy of the initial letter.
- **Form Letter B (FLB).** Seven form letter emails were submitted by individuals through Bridle Trails Community Club. They are all similar in their content. Refer to Comment Letter FLB-1 for copy of the initial letter.
- **Form Letter C (FLC).** Three form letter emails were submitted by Van Ness Feldman LLP on behalf of three different organizations. They are all similar in content. Refer to Comment Letter FLC-1 for a copy of the initial letter.

TABLE N-4 Form Letter Commenters

Name	Email	Address	Organization
FORM LETTER A COMMENTERS			
John Wu	john.wu12@gmail.com		Wilburton Community Association
Liangwei Ge	l.ge@outlook.com	13018 NE 1st St Bellevue, WA 98005	Wilburton Community Association
Ligeng Dong	dongligeng@gmail.com	602 129TH Ave SE Bellevue, WA 98005	Wilburton Community Association
Ping Jia	bottlejiap@gmail.com	602 129TH Ave SE Bellevue, WA 98005	Wilburton Community Association
Steve Engen	sengen09@gmail.com	1049 134th Ave NE Bellevue, WA 98005	Wilburton Community Association
Tammy Miller	2peppery@gmail.com	1025 134th Ave NE Bellevue, WA 98005	Wilburton Community Association
Phyllis White	phyllisjwhite@comcast.net	1057 134TH Ave NE Bellevue, WA 98005	Wilburton Community Association
Lee White	leewhite3@gmail.com	1057 134TH Ave NE Bellevue, WA 98005	Wilburton Community Association
Ying Wang	yingwang0088@gmail.com	120 130th Ave NE Bellevue, WA 98005	Wilburton Community Association
Zihong Guo	guozh@hotmail.com	605 130th Ave NE Bellevue, WA 98005	Wilburton Community Association
Jiang Wu	jiangwu@ymail.com	12814 NE 4th Pl Bellevue, WA 98005	Wilburton Community Association
Ying Jiang	joycejy@gmail.com	12814 NE 4th Pl Bellevue, WA 98005	Wilburton Community Association
Luming Wang	wang6831@hotmail.com	1220 134th Ave NE Bellevue, WA 98005	Wilburton Community Association
Yan Wang	wang6831@gmail.com	1220 134th Ave NE Bellevue, WA 98005	Wilburton Community Association
William Wang	wang6831@yahoo.com	1220 134th Ave NE Bellevue, WA 98005	Wilburton Community Association
Jianxia Gao	jianxia_gao@hotmail.com	12806 NE 2nd St Bellevue, WA 98005	Wilburton Community Association
Chuyong Fu	chuforth@hotmail.com	12830 SE 4th St Bellevue, WA 98005	Wilburton Community Association
Jun Wang	chuyang7612@hotmail.com	12830 SE 4th St Bellevue, WA 98005	Wilburton Community Association
Sachin Lande	lande.sachin@gmail.com	811 132nd Ave NE Bellevue, WA 98005	Wilburton Community Association

Name	Email	Address	Organization
FORM LETTER B COMMENTERS			
Pamela Johnston	pamjjo@msn.com	—	Bridle Trails Community Club
James Bowles	jbowles206@gmail.com	—	Bridle Trails Community Club
Mel Levine	gorgesailor@gmail.com	—	Bridle Trails Community Club
Rebecca Kinnestrand	rkinnestrand@gmail.com	—	Bridle Trails Community Club
Alison Cole	thecoles.1@gmail.com	—	Bridle Trails Community Club
Toni Vincent	tonivincent@aol.com	—	Bridle Trails Community Club Note: Filed as I-197
Phyllis White	phyllisjwhite@comcast.net	—	Bridle Trails Community Club Note: Filed as I-201
FORM LETTER C COMMENTERS			
Liberty Quihuis	lquihuis@vnf.com		Van Ness Feldman LLP c/o BelRed Design Center LLC
Liberty Quihuis	lquihuis@vnf.com		Van Ness Feldman LLP c/o Tristar Property Development Company LLC
Liberty Quihuis	lquihuis@vnf.com		Van Ness Feldman LLP c/o Elufa, LLC

N.4.2 Responses to Specific Comments

FLA-1

COMMENT

RESPONSE

BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

John Wu

Wilburton Resident Since 2011

6/9/2023

FLA-1-1 You are added as a party of record.

FLA-1-2 Comment noted.

Dear Ms. Stead:

FLA-1-1

Please include me as a party of record.

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

FLA-1-2

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

"Wilburton/NE 8th Subarea Plan Goals

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

and:

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

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

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

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

FLA-1

COMMENT

RESPONSE

Natural Determinants Policies:

"Policies

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

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

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

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

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

https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf

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

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

FLA-1-3 The commenter stated that the City issued a Determination of Non Significance. However, please note that the City issued a Determination of Significance and Environmental Impact Statement. See Common Response 9, Plants and Animals.

FLA-1-4 The City issued a Determination of Significance. See Common Response 2, Tree Canopy. See Common Response 3, Water Quality. See Common Response 4, Housing Options. See Common Response 11, COVID-19 Impacts.

FLA-1-5 See Common Response 2, Tree Canopy.

FLA-1-6 See Common Response 21 Stormwater Infrastructure.

FLA-1-7 See Common Response 21 Stormwater Infrastructure.

FLA-1-3

FLA-1-4

FLA-1-5

FLA-1-6

FLA-1-7

FLA-1

COMMENT

RESPONSE

FLA-1-8	Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:	FLA-1-8	The document referred to is from 2016 and is not related to this EIS. It is the second part of a two-part technical report, providing an overview of the changes in science relevant to the functions and values of critical areas since the previous critical areas ordinance update in 2006 and reviewing the City's critical areas regulations (in 2016) in preparation for an update to the city's Critical Areas Ordinance. Updating the Critical Areas Ordinance is outside of the scope of this EIS.
FLA-1-9	1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.	FLA-1-9	The City reviewed the traffic analysis and additional information has been prepared that is included in the FEIS.
FLA-1-10	2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.	FLA-1-10	Within the "thresholds of significance" sections of each chapter of the EIS, equity and sustainability performance metrics were incorporated to identify how well each alternative advances or hinders equity. These metrics are described in greater detail in DEIS Appendix H, and further analysis of racially disparate impacts is summarized in the city's Racially Disparate Impacts report that was used by the City in preparation of the EIS analysis.
FLA-1-11	3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.	FLA-1-11	See Common Response 21 Stormwater Infrastructure.
FLA-1-12	4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.	FLA-1-12	See Common Response 16 Critical Areas.
FLA-1-13	5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.	FLA-1-13	See Common Response 9, Plants and Animals.
FLA-1-14	6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.	FLA-1-14	See Common Response 21 Stormwater Infrastructure.
FLA-1-15	7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.	FLA-1-15	See Common Response 16 Critical Areas.
FLA-1-16	8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause tax-payer runoff plan liability. We need solutions that offer long-term sustainability.	FLA-1-16	See Common Response 3, Water Quality.
FLA-1-17	9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic	FLA-1-17	See Common Response 1, Non-Project vs. Project Level SEPA Review. Individual redevelopment projects may trigger requirements to provide greater stormwater mitigation than currently exists.

FLA-1

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

FLA-1-18 Comment noted. The City has a number of plans and policies - including this Comprehensive Plan Periodic Update - intended to guide good management and stewardship of Bellevue's natural resources. See Common Response 16 Critical Areas.

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

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

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

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

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

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

FLA-1-18

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

FLA-1

COMMENT

RESPONSE

FLA-1-19

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

FLA-1-19 See response to Comment FLA-I-18.

FLA-1-20

Other Considerations:

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

FLA-1-20 Although capacity for jobs and housing varies between the alternatives, the growth targets remain the same for all alternatives. The analysis in the EIS considers the full impact of the development regardless of whether it happens within or beyond the planning horizon.

FLA-1-21

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

FLA-1-21 See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLA-1-22

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

FLA-1-22 See Common Response 12 Impacts of Climate Change.

FLA-1

COMMENT

RESPONSE

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

FLA-1-23 See Common Response 12 Impacts of Climate Change.

FLA-1-23

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

FLA-1-24 See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337. See Common Response 12 Impacts of Climate Change.

FLA-1-25 See Common Response 11 Impact of COVID-19. See FEIS Appendix C, *Traffic Data Revised*. 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 FEIS.

FLA-1-24

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

FLA-1-25

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

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

FLA-1

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RESPONSE

FLA-1-26 factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

FLA-1-26 See Common Response 2 Tree Canopy.

FLA-1-27 **Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

FLA-1-27 While the topic of homelessness is not an environmental issue and thus is outside the scope of analysis for this EIS, the EIS does provide an analysis of housing and housing growth and implications under each alternative regarding supply, diversity and affordability, displacement risk, and access to transit. See Common Response 4 Housing Alternatives.

FLA-1-28 **Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

FLA-1-28 Comment noted.

FLA-1-29 It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

FLA-1-29 See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337. See Common Response 12 Impacts of Climate Change.

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

Sincerely,

John Wu

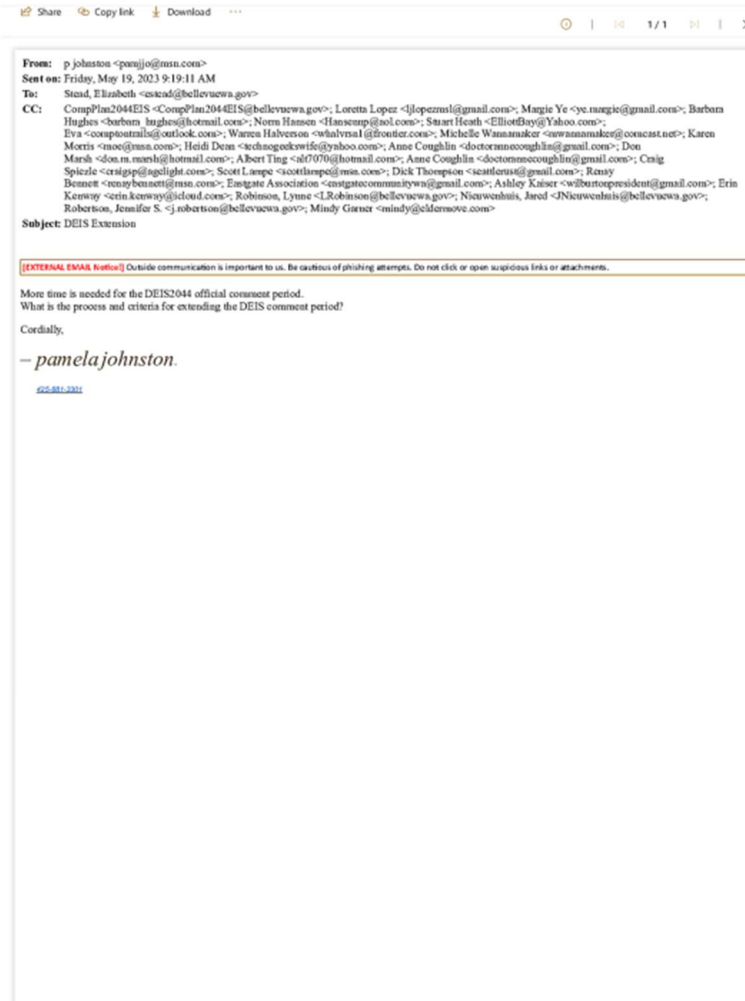
FLB-1

COMMENT

RESPONSE

FLB-1-1 DEIS Section 1.4, SEPA Process and Public Involvement, describes the environmental review process. The DEIS and public review process have been conducted in accordance with SEPA (Revised Code of Washington Chapter 43.21C) and Washington Administrative Code 197-11-442. The DEIS was circulated for an extended 45-day public review and comment period. The City of Bellevue has provided the maximum number of days for public review.

FLB-1-1 |



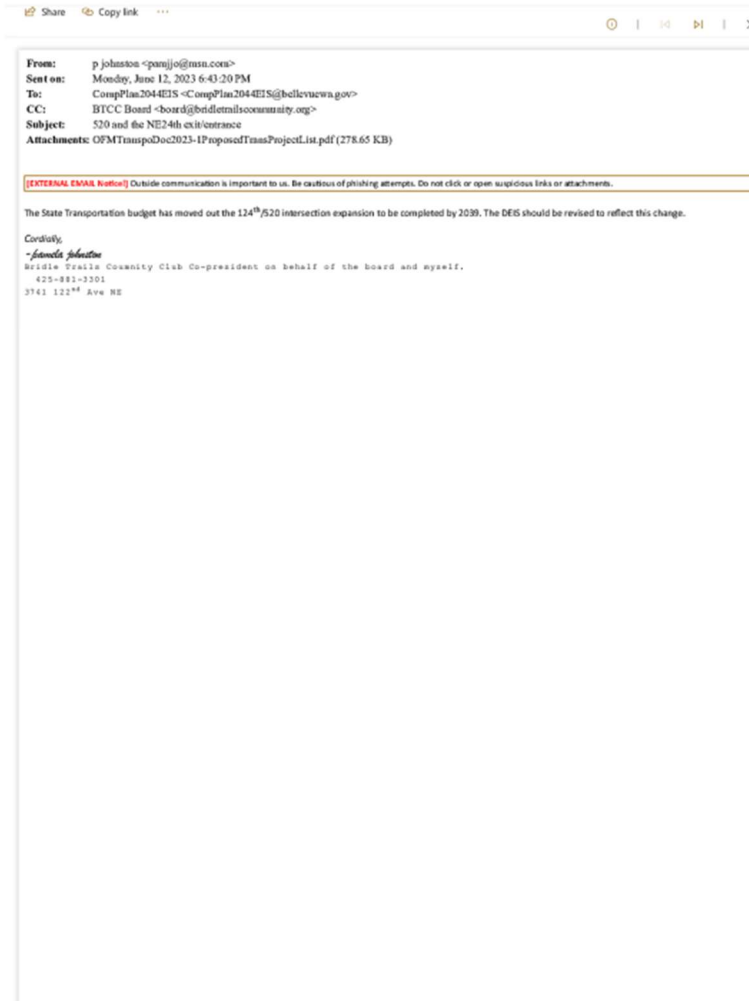
FLB-5

COMMENT

RESPONSE

FLB-5-1 All alternatives use the same transportation network for the analysis of the existing network plus new transportation investments adopted in the 2022-2033 Transportation Facilities Plan (TFP). Alternative 3 and the Preferred Alternative include the evaluation of the extension of NE 6th St as well.

FLB-5-1 |



FLB-6

COMMENT

RESPONSE

FLB-6-1 The City disagrees that environmental reviews issues were not adequately addressed in the DEIS. In addition to providing adequate environmental analysis as required by SEPA, the City has prepared additional information for the public to review as part of the FEIS document. See Common Response 2 Tree Canopy, Common Response 4 Housing Alternatives, and Common Response 7 Parks and Open Space.



Bridle Trails Community Club
 6619 132nd Avenue NE, #133
 Kirkland, WA 98033
bridletrailscommunity.org

June 11, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead
 City of Bellevue Community Development Department
 450 110th Avenue NE
 Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501(c)(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington’s Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

Bridle Trails has about 3,000 multifamily and about 2,000 single family homes of various densities. Per city records, Bridle Trails is second in affordable housing including low-income senior housing. Some larger lots support the 455-acre State equestrian park. Residents have many choices without having to move outside of Bellevue. Bridle Trails has been a leader in protecting tree canopy. Bridle Trails offers a diverse choice of housing densities. Parks, both public and private trails, and right-of-ways work as a network for people and animals. These are hallmarks of our neighborhood, which have been planned and nurtured over fifty years.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- House Bill 1220, 2022
- Timeline of growth
- Rapid growth
- Management of growth, Dialing Growth in or up
- Neighborhood plans
- House Bills: 1110, 1337, and 1181
- Changes in employment and housing as a result of Covid and remote working
- Resources omitted in the analysis (parks and recreation and plants and animals; large and domestic animals
- Urban Forest Ecosystem
- Water resources
- Salmon & Green space
- Tree Canopy
- Green Space & Streams
- Siting municipal development:
- Homelessness
- Historic Resources
- Accessible language

FLB-6-1

FLB-6

COMMENT

RESPONSE

- FLB-6-7 The analysis of creating policies related to individual neighborhood comprehensive plans is outside the scope of the EIS.
- FLB-6-8 See Common Response 4, Housing Alternatives Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337. See Common Response 5 Assumptions of Buildout. See Common Response 13 Growth Targets. The No Action Alternative includes no action taken by the city and is used as a comparison for all the Action Alternatives.
- FLB-6-9 See Common Response 4, Housing Alternatives Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337. See Common Response 5 Assumptions of Buildout. See Common Response 13 Growth Targets.
- FLB-6-10 See Common Response 15 Climate Change and State Planning Framework.
- FLB-6-11 See Common Response 11 Impact of COVID-19. See FEIS Appendix C, *Traffic Data Revised*. 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 FEIS.

FLB-6-6

Centers+Transit/job+Nearby). Area N was built in the 1950-60s and is 0.1-0.4 miles from Northtown Center/Park area. Area S is a mid-80s townhouse PUD more than one mile to I-405. For all areas, what is the criteria for triggering the right time and place for redevelopment? When would it be better to bank that growth to be used later?

FLB-6-7

NEIGHBORHOOD PLANS: The DEIS must distinguish the alternatives based on time. Neighborhood plans contain site specific policies. It is equitable that all neighborhoods have their comp plans updated. The DEIS should be revised to reflect the timing of Neighborhood plans in each Alternative.

FLB-6-8

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

FLB-6-9

HOUSE BILL 1337: Expanding Housing Options. This bill expands housing options through easing barriers to the construction and use of accessory dwelling units and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed, and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

FLB-6-10

HOUSE BILL 1181: Climate change and Resiliency. This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3. Thus, the alternatives were not analyzed to determine which alternative better meets sustainability, climate change, and resiliency. There are no recommended mitigation measures to also address components of this bill.

FLB-6-11

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



FLB-6

COMMENT

RESPONSE

FLB-6-12 See Common Response 2 Tree Canopy.

FLB-6-13 See Common Response 9 Plants and Animals.

FLB-6-14 See Common Response 2 Tree Canopy.

FLB-6-15 See Common Response 7 Parks and Open Space.

FLB-6-16 See Common Response 1, Non-Project vs. Project Level SEPA. The FEIS is an analysis of the environmental impacts of growth Alternatives associated with the Comprehensive Plan Periodic Update and Wilburton Vision Implementation. The Comprehensive Plan is a policy document and provides high-level policy direction to guide future growth and development. The Comprehensive Plan does not establish development regulations, and the FEIS does not analyze environmental impacts associated with project-specific development standards. The environmental analysis and mitigation measures identified and disclosed in the FEIS will inform the Comprehensive Plan Periodic Update and the code and policy amendments that the city will consider in connection with Wilburton Vision Implementation.

However, the EIS does identify potential mitigation for environmental impacts associated with the proposed growth Alternatives. The Sustainable Bellevue Environmental Stewardship Plan establishes a citywide target of 40% tree canopy by the year 2050 and includes initial strategies for accomplishing this. See Common Response 2 Tree Canopy for more information about how the impact to the tree canopy was analyzed in the EIS.

FLB-6-12

UPDATED TREE CODE, PARKS, AND GREEN SPACE, PARKS AND RECREATION: The City of Bellevue plans to update its tree code in 2023, which will have significant effects on new construction. Bridle Trails R-1 tree code may be updated. The updated tree code may, hopefully, provide better protection for significant and landmark trees, require contractors and builders to redesign multi-family and single-family homes to protect these trees, increase side yard setbacks, encourage understories, and improve the urban forest beyond single trees, as an ecosystem. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan inform and recommend ways that the new tree code should affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest, replenish the canopy with additional native trees, and nurture the ecosystem in the midst of change. Nowhere in the DEIS do the alternatives address how the existing urban forest and its ecosystem will be protected. Thus, the alternatives should describe how the tree canopy and parks would be affected. Would these additional residents and office works have additional parks and recreation opportunities, or will there be less opportunity for green space and parks? Will there be set asides in developments for green space? Will street trees be required? Will residential side yard setbacks be increased? The DEIS should be informative about this issue and recommendations should be provided in the DEIS. Note that in the DEIS PowerPoint provided in the DEIS public meetings, Slide #4 states the following: "The comprehensive plan ensures that people can: Enjoy Parks, Recreation, and Green Space. However, there is no DEIS analysis that shows differences in how alternatives will affect parks, recreation, and green space. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan will show synchrony with its Urban Tree Assessment, as well as with the planned updated tree code. Which alternatives may be best for protecting our urban trees? Note that the comprehensive plan should give direction for future policies and codes, but it is silent on how each alternative will impact parks, recreation, green space, and the urban forest as an ecosystem.

FLB-6-13

PLANTS AND ANIMALS: Although Appendix E was prepared to address plants and animals, this appendix was merely a whitewash stating that (with no analysis) there will be no impact on plants and animals that existing laws and regulations cannot accommodate. But it does not show how the comprehensive plan will meet the requirements of existing regulations nor does it provide any mitigation options that may be necessary to meet existing regulations.

FLB-6-14

In particular, the comprehensive plan should inform and provide direction to the planned Tree Canopy Code Amendments such that native trees and shorelines are protected during development. For example, native trees removed should be replaced by native trees of the same stature and growth, native shrubs should be placed on a recommended plant list for developers, all weed species should be removed on sites slated for development, riparian areas should be protected at least 200 feet from a stream, parks for families of all ages should be part of the plan such that parks should not only be planned for children. The Potential Impacts of the Comprehensive Plan Periodic Update page 995. Why were these issues not addressed? The comprehensive plan can do so much for the betterment of Bellevue residents.

FLB-6-15

Most people in the Wilburton area are concerned about how their green space will be protected from the increased development, but there is no discussion of their loss of green space. Why is this omitted in the DEIS?

FLB-6-16

Bellevue's tree canopy assessment states that there is an opportunity to implement regulations to require clustered development and preservation of large trees and that there is an opportunity to require developers to add trees through development regulations, but the DEIS and comprehensive plan is silent on this. Preserving and enriching clustered and connected trees such as through increasing residential side yard setbacks enables a richer urban forest ecosystem, where each tree increases its ecological value. However, the comprehensive plan is to



FLB-6

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FLB-6-16	<p>inform and recommend future development and that includes how development will protect our trees and either increase or maintain the tree canopy at 39 percent. How does each alternative address this? TABLE G-4 would lead us to believe each alternative has the same impact.</p>	FLB-6-17 See Common Response 9 Plants and Animals.
FLB-6-17	<p>LARGE WILDLIFE: The City must address the impact to large wild animals. Bridle Trails and South Bellevue have had bears on a semi-permanent basis in the last year. Bobcats regularly live in the Bridle Trails area. Coyote live and deer are a mainstay. Why are large, wild animals not addressed in Appendix E Plant and Animal Memorandum and in chapter 3 Land Use? How will growth throughout the county impact Bellevue? How the comprehensive plan will meet the requirements of existing regulations? What are mitigation options that may be necessary to meet existing regulations? Which areas are affected by each alternative?</p>	FLB-6-18 This is outside the scope of analysis for this EIS.
FLB-6-18	<p>DOMESTIC ANIMALS: The City must include domestic animals in its planning. Each of the alternatives has not addressed land use and animals, especially possible displacement of horses in equestrian areas. Chapter 11 Transportation needs to discuss provisions for equestrian use and trails. Parks and streets needs to consider pets, especially dog parks (SECTION 3.2. Affected Environment, Draft Environmental Community Amenities: Recreation and Services, p 3-11/123). Licensing should be addressed. Animals raised for food, e.g. chickens, will be effected by smaller lot sizes. With growth, the capacity of the City to meet the needs of animals. Why was this not discussed in the DEIS?</p>	FLB-6-19 This is outside the scope of analysis for this EIS. The DEIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts across all EIS topics as required under SEPA.
FLB-6-19	<p>URBAN FOREST: BTCC suggests that the comprehensive plan has a residential, ten-foot side yard setback, enabling tree planting while still providing area for fire prevention and fire service access. Tree canopy is very important due to climate change and increasing precipitation events. Trees significantly reduce runoff by taking up water through their roots. In fact, runoff from an area covered in impervious surface is five times that of a forested watershed of the same size.</p>	FLB-6-20 Project-specific development standards, which includes setback requirements, are outside the scope of the FEIS. However, the EIS does identify potential mitigation for environmental impacts associated with the proposed growth Alternatives identified and analyzed in the EIS. See Common Response 2 Tree Canopy for more information on analysis of the tree canopy.
FLB-6-20	<p>WATER RESOURCES: Reduced runoff leads to improved water quality, as it reduces the amount of polluted runoff that enters our waterways. Urban forests also reduce the risk of flooding and promote the restoration of groundwater. The comprehensive plan should contain policies to accommodate public use consistent with ecological conditions on site.</p>	FLB-6-21 See Common Response 3 Water Quality.
FLB-6-21	<p>SALMON & GREEN SPACE: A 200-ft stream buffer with trees and shrubs will provide shade and food for salmon. The insects that are on the trees and shrubs hanging near the water provide prey for the juvenile salmon out-migrating from the streams. If Bellevue wants to keep salmon within their streams, this needs to be discussed in the DEIS since development is a significant impact to plants and animals. How much green space will be lost under each of the alternatives? Why was this topic eliminated from the review? Mitigation should include protecting green space in areas slated for development and in spaces open to the public, accommodate public use consistent with ecological conditions on site.</p>	FLB-6-22 Stream buffer requirements fall under the regulatory purview of the Critical Areas Ordinance which includes project-specific development codes and regulations. Although the EIS identifies potential mitigation for environmental impacts associated with the proposed growth Alternatives, environmental impacts associated with specific changes to the stream buffer regulations in the city's Critical Areas Code, Part 20.25H LUC, is outside the scope of the FEIS. See Common Response 16 Critical Areas. See Common Response 7 Parks and Open Space. See Common Response 9 Plants and Animals.
FLB-6-23	<p>TREE CANOPY: The comprehensive plan should also include protection of our lakes from potential future development, particularly toxic chemicals emitted through increased road use and construction. It is unfortunate that Bellevue's stream corridors have only 65 percent tree canopy coverage. Trees, groves of trees, and connected habitat each play a role in tree canopy. How will the comprehensive plan inform, recommend, and direct protection of the tree canopy?</p>	FLB-6-23 See Common Response 2 Tree Canopy.
FLB-6-24	<p>GREEN SPACE & STREAMS: BTCC suggests that the comprehensive plan has a 200-foot protection zone and that native trees are planted by the developer to provide shade to streams. This is very important due to climate change and warming waters. A 200-ft stream buffer with trees and shrubs will provide shade and food for salmon. The insects that are on the trees and shrubs hanging near the water provide prey for the juvenile salmon out-migrating from the streams. If Bellevue wants to keep salmon within their streams, this needs to be discussed in the DEIS since development is a significant impact to plants and animals. How much green space will be lost under</p>	FLB-6-24 See Common Response 3 Water Quality for information on how the impact on streams was analyzed; and see Common Response 7 Parks and Open Space for how the impact on open space was analyzed. See Common Response 16 Critical Areas.



FLB-6

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FLB-6-25	<p>each of the alternatives? Why was this topic eliminated from the review? Mitigation should include protecting green space in areas slated for development.</p> <p>"TABLE G-4 Climate Vulnerabilities and Comparison of Alternatives" has the same conclusions for Alternatives 1,2,and 3.</p>
FLB-6-26	<p>Siting municipal development: Directions for municipal buildings as street activators and examples of mix-use development should be examined. Siting a library easily accessible via light rail or walking from homes fosters improved reading levels leading to a better educated, home-grown workforce. Environmental systems should be considered within the siting of municipal development beyond just the Wilburton area. Displacement policies should be added and avoid displacement. The DEIS should be revised to adequately give direction to siting municipal development and differences in strategy for each alternative.</p>
FLB-6-27	<p>The number of days with particle pollution has increased in the last several years, due to increased forest fires outside the city. With climate change, the city is at increased risk of wildfires, especially those with more tree canopy and near greenbelts and parks. Near Bridle Trails State Park is one such area. Not watering lawns and inadequate tree and understory increase the risk. Figure 3and 4. do not include these internal risks. II. Air Quality and Public Health and III. Bellevue Context should include risks from wildfires in the city. Where is the highest level of risk? Which alternative has better mitigation?</p>
FLB-6-28	<p>Homelessness: The City must address how homelessness will be avoided or minimized under each alternative. Although the City is investing in facilities such as shelters, transitional and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS? Please directly point out effects to the no-income residents and how this will be mitigated.</p>
FLB-6-29	<p>Historic Resources: The City must address historic and cultural resources beyond residences. Bridle Trails equestrian area, with its private and public trail system, equestrian nature, and connection to the State park is one such resource. In response to a request from local horseback riders who used the area, the Washington Commissioner of Public Lands set aside the area of the current park for park use in the early 1930s. Bridle Trails contains the only properties in the city that have agriculture current use, numerous out buildings such as barns and stables, pastures, an equestrian overlay, and an equestrian-based small-business sector. Many small businesses such as Olsen Tack and Legacy Hunters and Jumpers have left the area. Most of Bridle Trails was annexed between 1955-1967, more than 50 years ago. The GMA as sited in 4.2.1 #13 and the county wants to encourage historic planning. The multicounty planning policy (MPP) DP-6: "preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character", sited on SECTION 5.3. Historic Preservation Program, p 5-5. In 5.4, Neighborhood Subarea Plans are addressed.</p>
FLB-6-30	<p>Environmentally Sensitive areas: The City must address how environmentally will be avoided or mitigated under each alternative. Current land use in Bellevue includes environmental factors in the land use pattern. Erosion hazard (1990 SAO) such as along the Mercer Slough to I-405 do not use maximum capacity. In Bridle Trails, Erosion hazard areas and streams are R-1. Throughout the city, many streams were made into parks and green spaces. Eastgate Park accounts for a large erosion hazard area. How much space will be unbuildable due to environmentally sensitive area under each of the alternatives? What is the decline in housing units for each alternative?</p>

FLB-6-25	<p>The conclusions for most of the sectors are the same under all Action Alternatives. However, Table G-4 distinguishes differences in conclusions between the Action Alternatives. For example, as described on page G-18, Alternative 3 would have a greater likelihood of displacement but higher growth capacity and housing supply compared to Alternatives 0 and 1.</p>
FLB-6-26	<p>DEIS Chapter 3, <i>Land Use Patterns and Urban Form</i>, Table 3-16 summarizes impacts to access to community amenities including civic uses for each Alternative, and DEIS Chapter 10, Public Services and Utilities, focuses specifically on impacts to public facilities. Each chapter also supplies suggestions for mitigation and notes that future monitoring and system planning processes will consider how best to ensure provision of needed facilities. DEIS Chapter 3 also analyzes both residential and commercial displacement impacts for each alternative and includes mitigation to address these impacts.</p>
FLB-6-27	<p>See Common Response 12, Impacts of Climate Change. This comment notes concerns about increased wildfires and wildfire smoke due to climate change. DEIS Chapter 8, <i>Air Quality</i>, Figures 3 and 4 are in the context of particulate design values and air quality buffer areas, respectively. The design values are developed using three-year monitoring periods and are published once the EPA has completed their analyses of the data. The Puget Sound Clean Air Agency publishes the summaries of these data as well, with and without wildfire influences considered. As noted in the DEIS, the wildfire influences did not dramatically change the PM2.5 annual design values and not in a way that caused the standards to be exceeded.</p>
FLB-6-28	<p>While the topic of homelessness is not an environmental issue and thus is outside the scope of analysis for this EIS, the EIS does provide an analysis of housing and housing growth and implications under each alternative regarding supply, diversity and affordability, displacement risk, and access to transit. See Common Response 2 Housing Alternatives for more information on how housing was analyzed in the EIS.</p>
FLB-6-29	<p>See Common Response 7 Parks and Open Space. See DEIS Appendix D, <i>Historic Resources Survey</i>.</p>
FLB-6-30	<p>See Common Response 16 Critical Areas. Environmentally sensitive and other critical areas are regulated through the city's Critical Areas Ordinance (Part 20.25H LUC) and other development codes and regulations. The city's Critical Areas regulations apply to designated critical areas throughout the city, regardless of the growth Alternative analyzed in the EIS.</p>



FLB-6

COMMENT

RESPONSE

- FLB-6-31 Comment noted. The city strives to present a document that is understandable and begins with a section at the start of the DEIS with Acronyms and Abbreviations and provides call-out boxes. The term “gentle density” is relatively new term in planning. It refers to the missing middle between mid-rise and detached homes. This means that allowing smaller homes that use less land could be an important way to improve affordability. Where land is expensive, adding more homes on a given parcel reduces housing costs for each household. We have attempted to provide definitions to provide better understanding in the FEIS.
- FLB-6-32 See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337. See Common Response 12 Impacts of Climate Change. See Common Response 13 Growth Targets.
- FLB-6-33 You are added as a party of record.

FLB-6-31

Accessible language: Finally, the DEIS needs to be revised to remove or explain buzz words, industry jargon, and technical terms that are essential to understanding the DEIS. This DEIS should strive for transparency and accuracy in presenting information, impacts, and mitigation measures. “Gentle Density” does not mean kind, mild, moderate, slow, easy, nor slight density. It is professional jargon. Using these kinds of terms creates a lack of trust. “Gentle density” is a crucial term to understand this DEIS. It use has limited our ability to make comment. While the use of certain buzz words or industry jargon is not explicitly prohibited in an Environmental Impact Statement (EIS), the use of clear, concise, and accessible language makes the meaning easily understandable to a wide range of readers. This use of “gentle density” is especially jarring knowing that access is a fundamental value this City is underscoring. It has led to the perception that the document is dismissive of public input.

FLB-6-32

BTCC recognizes that it would be impossible to keep up with every possible land use bill and regulation, but these existing and signed bills are important for any city comprehensive plan and if not covered under this DEIS, then an amendment would be needed that would take more time to cover the requirements above. Furthermore, this amendment effort would be more costly to the City of Bellevue. BTCC recognizes the significant effort already undertaken for this DEIS, but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023. Too much has changed for the City to move directly into a Final EIS. That document would include new information not shown in the DEIS and may not meet requirements for informative decision making and communications to the public.

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

Sincerely,

The Bridle Trails Community Board

Signed

Pamela Johnston, Co-President

Loretta Lopez, Co-President

FLB-6-33

Please add board@bridletrailscommunity.org and the following as party of record

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FLC-1

COMMENT

RESPONSE

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June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update, Draft Environmental Impact Statement
Comments
c/o Thara Johnson
Comprehensive Planning Manager

Via comment portal

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

Dear Ms. Johnson,

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

FLC-1-1

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

1. The City Should Pursue Alternative 3.

FLC-1-2

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

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

FLC-1-3

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

FLC-1-1 The land use designation for the BelRed Design Center properties in Alternative 3 (BR-RC-H-1) was carried forward in the Preferred Alternative analyzed in the FEIS. Please note that while flexibility is allowed within BR-RC-H-1, residential use is emphasized.

FLC-1-2 Comment noted.

FLC-1-3 Comment noted.

FLC-1

COMMENT

RESPONSE

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FLC-1-4 Comment noted.

FLC-1-5 Comment noted.

FLC-1-3

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

FLC-1-4

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

FLC-1-5

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

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

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

² Table 4-2: GMA Goals (1)-(3).

³ Table 4-2: GMA Goals (5).

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

⁵ Table 4-2: GMA Goals (1)-(3).

⁶ See Bellevue Land Use Strategy LU-21.

FLC-1

COMMENT

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FLC-1-6 Comment noted. See FEIS Chapter 11, *Transportation*, for additional information.

FLC-1-5

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

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

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

BelRed Design Center commends the City's adoption of extensive policies and investments to support public transit, bicyclists, and pedestrians to foster increased usage of multimodal transportation. Currently, there are ten light rail stations anticipated to serve 43,000-52,000 daily riders by 2026.¹¹ To complement the growth of light rail, the City's 2022-2033 Transportation Facilities Plan ("TFP") identifies high priority pedestrian and bicycle projects to create a less car-dependent infrastructure.¹² Specifically, the TFP states the following short-term and mid-term objectives:

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

FLC-1-6

⁷ Policy S-BR-6.

⁸ Policy S-BR-7.

⁹ Policy S-BR-8.

¹⁰ Policy S-BR-13.

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

¹² City of Bellevue Transportation Facilities Plan, July 2022. Available at https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/City%20of%20Bellevue%202022-2033%20Transportation%20Facilities%20Plan_0.pdf.

FLC-1

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FLC-1-7 Comment noted.

FLC-1-8 Comment noted. To clarify, Alternative 3 proposes higher density in areas with more extensive multimodal transportation improvements.

FLC-1-9 Comment noted.

FLC-1-6

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

FLC-1-7

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

FLC-1-8

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

FLC-1-9

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

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

¹³ See Transportation Facilities Plan, p. 10.

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

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

¹⁶ DEIS, Section 2.3.

¹⁷ Compare Tables 2.4, 2.6, 2.8.

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

FLC-1

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FLC-1-10 Comment noted. See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLC-1-9

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

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

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

As noted above, the City has an established housing target of 35,000 additional units by 2044.¹⁹ Although all alternatives in the DEIS allow for some growth, Alternative 3 provides the City the most flexibility to respond to a diverse housing need. Alternative 3 provides the capacity for 95,000 additional housing units,²⁰ which is 54,000 more units of housing capacity than under the No Action Alternative. And as compared to the No Action Alternative, Alternative 3 also promotes the greatest increase in housing within transit-proximate areas, Neighborhood Centers, and Mixed Use Centers.²¹ For example, within Mixed Use Centers, Alternative 3 would provide 15,057 more housing units than Alternative 1 and 8,283 more housing units than Alternative 2. Here, Alternative 3 would provide thousands of Bellevue residents increased access to critical transportation and community infrastructure supportive of building a stronger city.

FLC-1-10

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

percent of Bellevue households were homeowners and 42 percent were renters. The breakdown of households between renters and owners and by size has changed over the past couple of decades. Bellevue is gaining renter households at a much faster rate than owner households. Between 2000 and 2020, the city experienced a net gain of more than 5,600 small households (1 or 2 members), the overwhelming majority of which (5,500 households) were renter households.²⁴

¹⁹ See DEIS Section 7.3.2 ("King County's adopted CPPs establish a housing target of 35,000 for Bellevue.")

²⁰ DEIS, Section 2.1. Alternative 2 would only allow 77,000 more housing units. Alternative 1 would only allow 59,000 additional housing.

²¹ DEIS Table 7-6. Alternative 3 will allow an increase of 55,800 housing units in Transit-Proximate Areas, 1,907 in Neighborhood Centers, and 78,628 in Mixed Use Centers.

²² DEIS Section 3.2 ("BelRed was historically characterized by warehouses and manufacturing. The center has begun to transition with the departure of many of the traditional uses, the expansion of the Medical Institution district, and the introduction of residential, office, and food services.")

²³ DEIS Section 3.2 ("About 38 percent of land within the center is still considered industrial, manufacturing, or warehouses, and about 10 percent is currently vacant. About one-third is either commercial, mixed use, or office (30 percent).")

FLC-1

COMMENT

RESPONSE

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FLC-1-11 Comment noted. See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLC-1-10

City, and its businesses, to quickly capitalize on the potential beneficial growth opportunities with the assurance that the City is able to meet surging housing needs.

FLC-1-12 Comment noted. See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLC-1-11

2. Alternative 3 supports the City’s need for diverse housing.

In addition to supplying more housing, the City should also adopt policies that foster more diverse housing options. Consistent with State, regional, and local policies, Alternative 3 promotes equity in the housing supply and flexibility for the types of available housing.

FLC-1-13 Comment noted.

FLC-1-12

On a state level, the Washington legislature in 2021 adopted House Bill 1220 (“**HB 1220**”), which amended the GMA to require cities and counties to “[p]lan for and accommodate housing affordable to all economic segments of the population.”²⁴ Similarly, the Growth Management Planning Council (“**GMPC**”), which establishes growth management strategies for King County, has established policies to support diverse housing options that are affordable to a wider segment of the population. The policies adopted by GMPC provide useful guidance to cities like Bellevue in evaluating how to best attract, retain, and expand diverse housing options that are available to a wider segment of the population.²⁵ Finally, the City’s DEIS is guided by four housing objectives to promote “diversity and choice,” which require the City to:

- Plan for a range of housing types and densities that support efficient capital facility investments.
- Prioritize affordable housing for very low-income families.
- Address past inequities that have shaped the city.
- Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunities, and transportation options.²⁶

FLC-1-13

Alternative 3 is most aligned with these objectives. Currently, the number of housing units available for residents with lower income does not meet the demand for affordable housing. Alternative 3 will require Mixed Use Areas like Bel-Red to utilize a mandatory inclusionary affordability program, promoting a range of housing options to current and future residents.²⁷

²⁴ See Washington House Bill 1220, Sec. 1.

²⁵ See GMPC Policy H-15 (“Increase housing choices for everyone, particularly those earning lower wages, that is co-located with, accessible to, or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and development regulations in place that allow and encourage housing production at levels that improve jobs housing balance throughout the county across all income levels.”); H-16 (“Expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county.”); H-17 (“Support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.”).

²⁶ DEIS, Section 2.3.1.

²⁷ See DEIS Table 2-8 (“This alternative focuses on equitably allowing middle-scale housing in areas of high opportunity across the city. A large variety of middle-scale types would focus on areas of high demand, while a smaller variety is available across the rest of the city. The variety of housing produced above would provide middle-income housing (80-120% AMI), but deeper affordability would still be required to achieve a majority of new units that are affordable <80% AMI. A mandatory inclusionary affordability program is included in Mixed Use Centers, while voluntary affordability incentives are expanded throughout the city.”).

FLC-1

COMMENT

RESPONSE

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FLC-1-14 Comment noted. See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLC-1-14 Inclusionary zoning will also support diversified housing options, is consistent with GMPC policies, and has a demonstrated track record of success. The City's current housing policies cannot support diversified housing, as shown by the 80 percent increase in median rent from 2010 to 2020.²⁸ Although all alternatives anticipate increasing the supply of affordable housing, Alternative 3 is the only alternative that requires mandatory inclusionary affordable housing. As a result, Alternative 3 allows the City to adopt affordable housing policies aligned with GMPC policies intended to support the extensive affordable housing needs that are saturating the Puget Sound Region.

FLC-1-15 Comment noted. See Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110 and HB1337.

FLC-1-15 By allowing neighborhoods within the City to provide inclusionary zoning, the City will become a local leader and regional model for taking comprehensive steps to foster diverse housing options. As noted above, this approach has been proven to be effective in the region. In a neighboring jurisdiction, the City of Redmond has successfully implemented an inclusionary zoning system. The City of Redmond has even been ranked among the top ten U.S. cities for finding rental housing, with the development of 6,000 units between 2021 and 2021, an 85.1% increase. Alternative 3 would align the City's future housing options with Redmond's strong example of proven success.²⁹

FLC-1-16 Comment noted.

FLC-1-17 Comment noted.

3. Alternative 3 promotes investment in the City through market-feasible development.

FLC-1-16 Alternative 3 provides the flexibility for investors and developers to determine the types of market-feasible projects within appropriate parameters. Bel-Red's Subarea Plan is designed around a housing policy that creates a sustainable future, with economic, social and environmental dimensions. To that end, Policy S-BR-40 of the Bel-Red Subarea Plan seeks to "[e]ncourage a diversity of housing types, from high density, multi-story housing in transit nodes, to medium density housing outside nodes, to other innovative housing forms, such as live/work and work/live units." At the same time, the Bel-Red Subarea Plan recognizes that sustainable housing entails "significant challenges" because "[n]ew urban residential neighborhoods will require an array of public and private investments in open space and other amenities needed to support high quality, livable places."

FLC-1-17 Alternative 3 will allow for the most flexibility with respect to the bulk and height of housing, while consolidating development to retain natural areas and open space. Alternative 3 allows for the highest capacity of additional housing units (54,000 above the No Action Alternative, and 60,000 above the CPP housing target). Moreover, the capacity for additional jobs increases to 200,000 under Alternative 3 (76,000 above the No Action Alternative and 130,000 above the CPP job target).

Outside of Bel-Red, Alternative 3 anticipates the greatest investment in housing by allowing developers to respond to market demands. The DEIS assumes that "all developable or redevelopable parcels are built to a range of expected densities in each of the alternatives . . . letting potential developers respond to the market demands relating to the type of housing and

²⁸ DEIS Section 7.2 ("From 2010 to 2020, the median rent in Bellevue increased by more than 80 percent. Bellevue's median rent in 2020 is about \$200 higher than King County as a whole.")
²⁹ See <https://www.bizjournals.com/seattle/news/2023/01/23/redmond-top-10-finding-new-apartments.html>

FLC-1

COMMENT

RESPONSE

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FLC-1-18 Comment noted.

FLC-1-19 Comment noted.

FLC-1-17

commercial space and also provide flexibility for market demands.” By giving options to developers, while recognizing the limitations of market forces, Alternative 3 will attract investment and development in areas in the City where density can be affordably produced.

D. Alternative 3 will provide the greatest protection from environmental impacts, including air quality and natural and open spaces.

FLC-1-18

Because all alternatives expect some level of housing, commercial square footage, and job growth, all alternatives will have some impacts on views, shadows, light, and glare.³⁰ As explained in the DEIS, the Bellevue Land Use Code will provide mitigation for these kinds of impacts to views, shadows, light, and glare by establishing zoning and development regulations that govern uses, building design, site planning, and land use compatibility.³¹ The DEIS also identifies mitigation measures not currently included in the alternatives,³² and concludes that, “[w]ith the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.”³³ This is true for all alternatives, including Alternative 3.

FLC-1-19

Unlike Alternatives 1 and 2, however, Alternative 3 allows for “increased flexibility in height and building typologies for large lots that consolidate development to retain natural areas and open space.”³⁴ For example, in BelRed, Alternative 3 proposes new land use zones allowing for high rise buildings up to 25 stories, while Alternatives 1 and 2 limit heights in Bel-Red to around 16 stories.³⁵ At the same time, the areas designated as parks and open space are consistent throughout all alternatives.³⁶ By allowing development to build up as opposed to out, without reducing the amount of natural areas and open space, Alternative 3 provides the most flexible path to better integrating the built and natural environment.³⁷

2. Concluding Remarks

BelRed Design Center looks forward to continued engagement in the City’s DEIS process and ongoing planning, and thanks the City for its diligent work toward sustainable development. We urge the City to adopt Alternative 3 and promote flexible development, meet anticipated growth needs, and utilize the City’s transportation initiatives.

Thank you for taking the time to consider our comments.

³⁰ See DEIS, Section 6.4.

³¹ See DEIS Section 6.5.2.

³² See DEIS Section 6.5.3.

³³ See DEIS Section 6.6.

³⁴ See DEIS, Section 6.4.6.

³⁵ See DEIS Appendix B, Land Use Patterns and Urban Form Appendix

³⁶ See DEIS Appendix B, Land Use Patterns and Urban Form Appendix

³⁷ See DEIS Appendix B, Land Use Patterns and Urban Form Appendix. Proposed zoning designation include: (1) BR-RC-H1, which would allow “[m]ostly housing with limited retail, office, & services in highrise towers generally up to around 16 stories,” and BR-RC-H2, which would allow “residential highrise towers including ground floor active uses up to around 25 stories.”

		COMMENT		RESPONSE
I-1				
I-1-1	I prefer alternative 3. It is the highest and best use of the land and will make the Wilberton area a dynamic, urban place that facilitates more economic activity and encourages transit and non-vehicle transportation.		I-1-1	Comment noted.
I-1-2			I-1-2	Comment noted.
I-2				
I-2-1	First of all, two of your hypertext links (to provide feedback) are broken. Please look under "Ways to Comment During DEIS Process." The online portal is broken as well as the virtual meeting registration option. Thank you.		I-2-1	Thank you for the alert. The hypertext links were repaired within a day of receiving notice.
I-2-2	I completed the Engaging Bellevue Survey. So, I have provided my overarching thoughts on growth. We have lived in an old SF neighborhood for the last 20 years. We have experienced a lot of growth and changes over the years. Much of it has been positive; however, we have very GRAVE concerns about the Pinnacle South and North projects. It's shocking to learn that Bellevue has allowed such an irrational amount of towers to be built right next to neighbors' homes. Makes me wonder if Bellevue considers existing residents' quality of life at all. As I understand it, both projects do not include green spaces. No public parks, no dog walking parks, barely any open space, and almost zero trees. We live in Bellevue not Shanghai, LA, or NYC. Why does the planning department believe that such an appalling development is suitable for that location in Bellevue? Very disappointed in your planning department.		I-2-2	Comment noted. See Common Response 7 Parks and Open Space.
I-2-3	Again, quality of life issues involve a balance of green spaces, preserved natural spaces, and a measured amount of growth. Where are all these new residents going to go for outdoor enjoyment? We only have one large public park in downtown Bellevue. It is shameful, that the planning department has pushed these projects through. Please do better job for existing Bellevue residents. We deserve to be considered along with all the new residents.		I-2-3	See Common Response 7 Parks and Open Space
I-2-4			I-2-4	Comment noted.
I-3				
I-3-1	Please lower the home prices for Bellevue area.		I-3-1	Comment noted. See Common Response 4 Housing Alternatives.

I-4	COMMENT	I-4-1	Response	RESPONSE
I-4-1	<p>Bellevue should make sure there is most of the train track devoted to a generous walking and bicycling track through Bellevue..</p> <p>Presently, the tracks and controls of the Transit repair station make the pathway narrow and uncomfortable.</p> <p>Roy McMurrey</p>	I-4-1	Comment noted.	RESPONSE
I-5	COMMENT	I-5-1	<p>The city provided a variety of ways for the public to learn about and view the DEIS through both virtual and in-person public meetings, access through the website, and availability to view a hard copy at the in-person meetings. The DEIS link was provided in the notifications distributed to the public: https://bellevuewa.gov/2044-environmental-review. The issue with the file was corrected within several hours of posting the DEIS by the City of Bellevue. The public was provided an opportunity to review and comment on the DEIS for a 45-day period in accordance with SEPA.</p>	RESPONSE
I-5-1	<p>My first comment was that I was very disappointed to see how hard it was to even find the Draft EIS statement -- I don't see how Residents can meaningfully comment on the DEIS if they can't even find it! I don't understand why you don't even tell Residents how to find this document?</p> <p>And then the document itself is given a very strange filename, and when I open it in my default Microsoft Edge browser it is in some kind of strange "booklet" format or something that was pretty much impossible to read in Microsoft Edge. So then I had to download the DEIS and re-open it in Adobe Acrobat -- which then displayed the document without the strange formatting problems -- and I could actually read it.</p> <p>My impression is that City of Bellevue never actually intended to allow Residents to actually read this document. Is that correct?</p>	I-5-1		RESPONSE

I-6	COMMENT	RESPONSE
I-6-1	<p>With an average plastic recycling rate of 9-10% (https://time.com/6178386/plastic-recycling-rates-overestimated/), I'd like to suggest funding for a material recovery facility (MRF - https://en.wikipedia.org/wiki/Materials_recovery_facility) or a plastic recycling recovery (PRF, specialized MRF) - perhaps in conjunction with neighboring cities. This will make feedstock available for plastic recycling facilities using both mechanical and advanced technologies.</p> <p>With the announced recycling facility in Arlington, WA (https://muratechnology.com/news/mura-opens-us-office-and-announces-first-site-in-wa) it will be important to collect plastic in an efficient manner to make it available for recycling.</p>	<p>I-6-1 The current policies and regulatory framework for solid waste services are described in DEIS Section 10.2.3, Utilities. As noted on FEIS page 10-21, the King County Solid Waste Division provides regional planning, transfer and recycling and disposal services for Bellevue, as well as 32 other cities. King County adopted the 2019 Comprehensive Solid Waste Management Plan, which sets a goal to keep 70 percent of materials with economic value out of the landfill, with initial phases focusing primarily on diverting food, paper, and plastics from the waste stream.</p>
I-7	COMMENT	RESPONSE
I-7-1	<p>Alternative 3 is the only alternative close to inspiring passion for businesses and citizens to want to do things in the city. Ship it!</p>	<p>I-7-1 Comment noted.</p>
I-8	COMMENT	RESPONSE
I-8-1	<p>Please keep the most flexibility, highest and best use zoning, and let the market</p>	<p>I-8-1 Comment noted.</p>
I-8-2	<p>dictate what can and should be built. Option 3 provides the greatest flexibility and should be implemented.</p>	<p>I-8-2 Comment noted.</p>

I-9

COMMENT

RESPONSE

Comments on Bellevue 2044 draft EIS by Al Dietemann
May 11, 2023

I-9-1

The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning time frame.

I-9-1

The growth drunk City planners believe growth will never end and recession isn't possible. They have little recognition or historical memory of what a major downturn in the tech sector would mean to the City in terms of jobs and housing. Examine the City's employment statistics and note that Bellevue does not have a diverse employment base, it is mostly technology, retail, and services. Manufacturing, government, military, and other recession proof employment is almost non-existent. When a big tech downturn happens, and it most certainly will, the City population and housing will rapidly empty out. Nothing in the EIS recognizes a recession scenario.

I-9-2

See Common Response 13 Growth Targets. The Washington State Office of Financial Management (OFM) projects a higher proportion of older adults living in King County in 2044 compared to today. Recognizing a wide variety in housing types and location preferences, Bellevue's growth alternatives consider different approaches to increasing the diversity of housing options that could be made available across the city. DEIS Chapter 7 *Housing*, Table 7-6 provides a comparison of the alternatives in terms of the distribution of different housing structure types within different geographic areas.

I-9-2

The EIS fails to consider future demographic changes. Twenty-five percent of Bellevue residents are already over age 55. Many older folks will be leaving Bellevue, they are being taxed and priced out of the housing market. Others will leave to escape the growing traffic and high density life style they don't appreciate. Many retired seniors won't be able to afford or desire the new high rise construction. Where is the accounting for these type of vacancies in the growth statistics? A similar large percentage of people in Bellevue are young large families who may not be attracted to the high density high rise construction being planned. They need large homes but can't afford them as they are already being priced out of the City's single family homes. The assumption that all this increased population being planned will desire to live in high density multi-story buildings needs to be reexamined. The EIS is building growth scenarios on weak unsupported assumptions without a firm foundation built on public opinion surveys. Consider a growth option where many of the new employees being planned for may not want (or afford) to live in a high density Bellevue.

I-9-3

See Common Response 2 Housing Alternatives.

I-9-3

Another aspect needing consideration in the EIS is the demographics of a city population rapidly moving from home ownership to renting. Seattle has more renters than home owners. Bellevue will be there too by 2044. This needs discussion as part of the growth options presented in the EIS. Renters have very different perspectives than homeowners about their communities. The EIS should anticipate and consider the impact of these likely changes.

The EIS gives only minimal and token reference to the major problems created

I-9

COMMENT

RESPONSE

I-9-4 | by rapid urban growth. Where is the analysis of utility infrastructure needed to support these growth scenarios? Major upgrades will be needed in capacity for water, sewer, fire protection, solid waste, gas, electricity, and cable. These will have significant environmental impacts. People are now waking up to impacts like higher building shadows and increased city night-lights and noise. Privacy and crime issues come with growth too. Who will pay for all the upgrades needed in these growth options? The answer is existing and future taxpayers and utility customers. Growth isn't low cost. Higher density requires additional government services and increased taxes. Where is that cost analysis? Shove all those future problems to future City Councils? Look around at the major problems being experienced in other high growth cities. Bellevue won't be unique. The City wants to plan for growth, but has the Council considered that growth itself may be the problem? The Council has voted to preserve the character of old town Bellevue by excluding certain new buildings, but it isn't following the same the same preservation logic for the rest of the City. Is the growth policy now islands of historic preservation in an ocean of new high rise construction?

I-9-5 |

I-9-4

See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. The FEIS also identifies potential mitigation for environmental impacts associated with the proposed growth Alternatives analyzed in the EIS. An analysis of utility infrastructure needed to serve the growth proposed by the Preferred Alternative will be provided on a case-by-case basis as individual projects are proposed and undergo project-level environmental review under SEPA. Other impacts mentioned are analyzed in the following chapters of the DEIS: Chapter 6, *Aesthetics*, for a discussion shadow and light impacts; Chapter 9, *Noise*, for a discussion of noise impacts; Chapter 10, *Public Services and Utilities*, for a discussion of crime and police response. As discussed in DEIS Chapter 10, page 10-30, decisions on how to fund the improvements needed to support future growth under the Preferred Alternative would be made during the regular capital facility planning process.

I-9-5

The EIS includes evaluation of several alternatives, including taking no action at all.

I-10

COMMENT

RESPONSE

I-10-1 | I support Alternative #3 since it provides most affordable housing in Bellevue.

I-10-2 | The zoning of BR-RC-H-1 should be extended into the box of Northup Way, 140th Ave NE, 148th Ave NE and NE Bel-Red Rd, since this area is closed to public transportation, such as light rail, bus and highway. It would provide much more affordable housing units.

I-10-1

Comment noted.

I-10-2

With this area being more than a 1/2 mile from light rail stations and with a goal of achieving a diversity of housing types within neighborhoods and across the city, the lower density CR future land use designation was studied in this area in the Preferred Alternative in the FEIS. Dense, affordable housing has been developed within the CR designation in the recent past and is anticipated to continue in the future.

I-11

COMMENT

RESPONSE

	<p>This draft is 1000 pages, that's insane and I'm not reading all that.</p>	I-11-1	<p>Comment noted.</p>
I-11-1	<p>Based on a skim though, it seems like the study and plans seem to show the best thing for housing, the environment, the economy is Alternative 3. The one that targets the most amount of housing, increasing density, and has more transit oriented development. The document repeatedly talks about the positive impacts of Alternative 3. I also liked seeing the considerations for improving zoning regulations to make building better/easier. I'd also recommend investing in simplifying zoning and other regulations and investing so that permits and the beaucratic process can go even more quickly, allowing builders to start faster and in turn save in costs.</p>	I-11-2	<p>This is outside the scope of analysis for this EIS. See Common Response 19 Zoning Details.</p>
I-11-2	<p>Based on a skim though, it seems like the study and plans seem to show the best thing for housing, the environment, the economy is Alternative 3. The one that targets the most amount of housing, increasing density, and has more transit oriented development. The document repeatedly talks about the positive impacts of Alternative 3. I also liked seeing the considerations for improving zoning regulations to make building better/easier. I'd also recommend investing in simplifying zoning and other regulations and investing so that permits and the beaucratic process can go even more quickly, allowing builders to start faster and in turn save in costs.</p>	I-11-3	<p>Comment noted.</p>
I-11-3	<p>I'm glad that alternative 3 is shown to have the best impact for our region, both in housing, economy, and the environment and strongly urge that this proposal is the one that get's focused on and delivered.</p>	I-11-4	<p>DEIS Chapter 1, <i>Summary</i>, provides a summary of key findings, impacts, and potential mitigation measures in Section 1.7, and a summary of significant unavoidable adverse impacts in Section 1.8. FEIS Chapter 1, <i>Introduction and Summary</i>, also provides a summary of impacts and potential mitigation measures for the No Action and the Preferred Alternatives.</p>

I-12

COMMENT

RESPONSE

	Hello,	I-12-1	Comment noted.
	I attended the May 8 city council meeting regarding a rezone of the Bellevue Village shopping area and the entire perimeter of Downtown Bellevue.	I-12-2	Comment noted. See Common Response 7 Parks and Open Space.
I-12-1	Because I was not afforded the opportunity to speak (only 3 speakers per topic) here are my comments: I believe the planning department has not considered the impacts for existing neighbors. The "Building a Livable City for Everyone" slogan does not seem to include current residents. Why is that? From my vantage point, the planning department seems to be more interested in pleasing developers. Developer representation at the May 8 meeting far surpassed the representation of existing neighborhoods that will be severely impacted. I wondered, were the neighbors notified? Vuecrest was notified just before the meeting, and we are a very active association. So, I wonder, were other, less organized neighbors notified. It seems unlikely. Because if they knew that the city council was planning an upzone that would create a lot of negative impacts for them, they would certainly want to have the opportunity to voice their concerns. Wouldn't you? Sadly, the rezones and upzones will likely be shocking for them.	I-12-3	Comment noted.
I-12-2	How will existing neighbors be negatively impacted: 1) Our environment (no new parks, barely any green at all, mostly just concrete and steel), 2) Street crowding (Planning Department: No worries regarding parking requirements	I-12-4	Comment noted. See FEIS Chapter 6, <i>Aesthetics</i> , for additional information on viewpoints and shadows.
I-12-3	because the builders will be building affordable housing. Apparently, people living in affordable housing do not use cars. I haven't seen any data regarding that fact). 3) Existing neighbors will be living in the shadow of these buildings.		
I-12-4	You say that's not important? Well, if you bought your house 5, 10, 15, or 20 years ago, your viewpoint should be considered. Why is an existing neighbor's viewpoint less important than a builder? Or a new neighbor?		
	Vuecrest has spent many hours attending North and South Pinnacle projects' planning meetings (for approx. 6 years), and yet the planning department disregards previously agreed upon "Wedding Cake Design (WCD)." The WCD would have gradually stepped up new building heights to ensure that current neighbor's privacy and sunlight would not be lost. Instead, it seems that the planning department gave developers what they want and turned its back on Vuecrest and other neighbors. What has happened to Bellevue?		

I-12

COMMENT

RESPONSE

	<p>Again, you say, "Building a Livable City for All" but that doesn't seem to be true. Does it? Will Bellevue be livable for existing neighbors?</p>	I-12-5	Comment noted. See Common Response 19 Zoning Details.
I-12-5	<p>The South and North Pinnacle projects are extremely oversized - 15 towers! And that does not include the up zone of "overlay A-1, A-2, B-1, B-2." If the existing citizens of Downtown Bellevue had any idea of your plans, I suspect that they would be extremely disappointed and feel violated.</p>	I-12-6	Comment noted. See Common Response 4 Housing Alternatives.
	<p>So, how do the North and South Pinnacle developments impact the environment? Re: The Draft Environmental Impact Statement (DEIS). Seems obvious to me. In a very negative way. Quality of life for existing neighborhoods will dramatically decline. Will the planning department respond with requests of developers? Seems unlikely. Case in point: When Vuecrest asked the planning department to include a turnout of the new apartment complex (Bellevue 10) adjacent to LUX Apartments, the city said no. A simple request for a turnout, and the answer is no. Hmm? I noticed that when the City of Bellevue was installing new sewer pipes along 100 Ave, the city's own construction vehicles parked in the LUX Apartment building turnout. Interesting how the truth eventually finds its way. Isn't it?</p>	I-12-7	Comment noted. See Common Response 7 Parks and Open Space.
		I-12-8	Comment noted.
I-12-6	<p>What about Affordable Housing? Well, let's take a look at Seattle and see what they have done in the name of affordable housing. According to The Seattle Times (May 12, 2022) of the 282 projects that were subject to the Mandatory Housing Affordability program (MHA) in 2021, only 13 chose to include affordable units onsite - the other 269 projects chose to pay the fee instead. So, in 2021 a total of 95 affordable units were added to Seattle's stock of affordable housing. Only 95 units were built. The rest of the money was given to the city to decide how to spend it. And how did the city of Seattle spend that money? Well, since MHA was established, projects in Northeast Seattle (Ravenna, Roosevelt, and the U-District) have contributed the most money by far (\$51 million in fees), but the city of Seattle has yet to invest any of the \$51 million in those neighborhoods in the form of affordable units.</p>		
I-12-7	<p>In summation, we are asked to give up our livable city, give up our green spaces, give up our privacy and daylight, give up street livability, in the name of Affordable Housing that may end up adding just one percent of affordable housing units?</p>		
I-12-8	<p>To the staff of the DEIS and the planning department, please show sincere kindness and concern towards Bellevue's old neighborhoods. We were here when Bellevue was a sweet little city that cared about one another. We made Bellevue a top-rated, livable city. Can you please show an equal amount of concern for us?</p>		
	<p>Thank you</p>		

I-13

COMMENT

RESPONSE

I-13-1

I have loved living in Bellevue in a couple different homes for many years. We purchase our first home here because of location, larger lot size option, convenience to schools and shopping and the neighborhood. Bellevue may need more housing and a wider variety of options but I would feel betrayed by the insertion of small multi family apartment or duplex units in my 1.8 zoning. My neighbors and I chose the location (and have paid the corresponding taxes and utilities because of that choice). The city, school district, county, state, and appropriately zoned private properties are a better place to start looking for future options for Bellevue's housing needs. Please maintain the single family nature of our neighborhoods!

I-13-1

The city is evaluating the environmental impacts of allowing 4 units per lot in areas with 1.8 zoning (like yours) in compliance with recent amendments to the state law, including HB 1110.

I-14

COMMENT

RESPONSE

I-14-1

I grew up in Bellevue and my wife and I make a decent income. More than the typical family on your planning guide and we still can not afford even a tear down home in the most modestly priced neighborhood of Bellevue. It is out of control. I am in full support for approach 3. Any strategy that does not maximize the production of homes is just going to perpetuate the affordability problem. I know there are a lot of long time property owners who want to maintain the status quo but most of those same property owners could not afford to buy their home today if they were looking from the outside in. I understand that change is hard but it is ridiculous to expand the capacity of commercial real estate in downtown Bellevue without any real plan on how to house all these new people and their families. There also needs to be a common sense approach to tree policy or those trees become the weapons that the status quo will use to stop housing. Lets face it. The state is never going to expand the urban growth boundary so the only option we have is to get denser to add more housing. It's simple supply and demand.

I-14-1

Comment noted. See Common Response 4 Housing Alternatives.

I-14-2

Comment noted. Please see DEIS Chapter 2, *Alternatives*, for a description of the range of capacities to accommodate housing and job growth, housing types, and investments in infrastructure citywide. See Common Response 4 Housing Alternatives.

I-14-2

I-14-3

Comment noted. See Common Response 2 Tree Canopy.

I-14-3

I-14-4

Comment noted.

I-14-4

I-15

COMMENT

RESPONSE

I-15-1

Fig 11-4 Bicycle Network LTS Vision has no bike routes. It should indicate existing routes such as the 520 Physically Separated Bikeway and 120th Ave NE Striped bike lane, etc.. Plus the planned bike routes including estimated completion dates. Also, include the LTS designation for both the existing and proposed bike lanes.

I-15-1

Figure 11-4 has been corrected in FEIS Chapter 11, *Transportation*.

I-16

COMMENT

RESPONSE

I-16-1 The Preferred Alternative studied in the FEIS included future land use around Lake Bellevue with a RC-M character.

I-16-1

*Thank you for letting me comment on the DEIS for the Comprehensive Plan. I want to comment about the Wilburton Vision. I support maximizing TOD opportunities around the new Light Rail Station. TOD is the smart way for the City to grow. I am one of the owners at the Nine Lake Bellevue Office Condominiums. Our parking lot is right next to the new Light Rail Station. It should be planned for intense TOD. A big surface parking lot right next to the station is a lost opportunity for smart development. Sherri Anderson

I-17

COMMENT

RESPONSE

I-17-1 Comment noted.
I-17-2 Comment noted.

I-17-1

Option 3 works best for me because the various kinds of housing and jobs are close together. Residential should be on top of commercial, not a long drive away. Option 43 has a very bad components because of the high rise units. This is very bad. this again forces people to drive long distances. Sidewalks should be wide, there should be retail on the bottom floors and residential on the top floors but no more than 5 stories. people should have the option of walking or biking, and should not be compelled to drive.

I-17-2

the other two options oblige people to drive. Which would be bad for the environment, and worse for the comfort of the people. There should be single family houses, of course. but noi single family house should be more than 25 minutes away from comercial or other forms of employment. There are cases like near my apartment where the road is plugged up every night with the traffic tails back for more than a mile from the 205 freeway. this is bad for the environment. it is like this for asd long as 3 hours a night.

I-18

COMMENT

RESPONSE

I-18-1

I appreciate the opportunity to provide feedback on the DEIS for the Comprehensive Plan, specifically regarding the Wilburton Vision. It is crucial that we prioritize maximizing Transit-Oriented Development (TOD) around the new Light Rail Station as an intelligent approach to the city's growth. As one of the owners at the Nine Lake Bellevue Condominium, I strongly believe that the parking lot adjacent to the new Light Rail Station should be planned with a focus on vibrant TOD. I recommend including mid-rise and high-rise office and residential options in all planning alternatives for the properties surrounding Lake Bellevue, particularly those in close proximity to the station.

I-18-1

The Preferred Alternative studied in the FEIS included future land use around Lake Bellevue with a RC-M character.

I-19

COMMENT

RESPONSE

I-19-1

The car-centric lifestyle Bellevue encourages is incompatible with livability. Reduce vehicle travel lanes and free parking. Encourage car-free and car-light lifestyles.

I-19-1

The FEIS refers to the Mobility Implementation Plan that provides a multimodal approach to support growth, with the intent that walking, bicycling, and riding transit are options for most people, enabling a car-light lifestyle.

I-20

COMMENT

RESPONSE

I-20-1

I am a small business owner at 9 Lake Bellevue Dr and our parking lot is right next to the new light rail station. I do not see a reason why the properties closest to the new Wilburton Light Rail Station are excluded from two of the three alternatives for TOD in the new Comp Plan? Why is "high rise" the only option? Having only one option does not make sense. A mix of all kinds of TOD will create a modern and vibrant environment in Wilburton in the long run. Thank you

I-20-1

The purpose of having several alternatives in the DEIS is to analyze the impacts of different growth options, including different options around Lake Bellevue.

I-21

COMMENT

RESPONSE

To : City of Bellevue Planning
From: Todd and Linda Stabler

6-1-23

We really appreciate the opportunity to comment on the Comprehensive Plan and Wilburton vision rezoning. We have been owners of an office condominium, 9 Lake Bellevue, and our parking lot is next to the new transit station, we have been owners for over 10 years. We welcome the development possibilities that the new station could bring to Bellevue, the potential for mid or high rise office and residential units – the lake is very attractive we believe and high rise could bring good view opportunities to a nice area. We have seen that not all 3 alternatives to the plan offer mid and high rise office or residential development and we would encourage the City to give all three options those options. We see high rises all around us – the spring district, and Downtown Bellevue and we believe development in our neighborhood would be a nice progression to the light rail now available.

Thanks YOU

Todd Stabler



I-21-1 The Preferred Alternative studied in the FEIS included future land use around Lake Bellevue with a RC-M character.

I-21-1

I-22

COMMENT

RESPONSE

**Draft EIS
City of Bellevue 2044 Planning Study
Comments at the June 1, 2023 public meeting at city hall**

I have three concerns with the draft EIS.

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

For downtown Bellevue residents, our environment is severely damaged by numerous high-rise construction projects.

Noise, smoke, dust, detours and lane closures, sidewalk closures, traffic backups, convoys of huge, noisy, smoking trucks, debris in the road – these are all daily occurrences. The noise level at our residence – jackhammers, shrill backup warnings, the crashing of steel girders - has frequently been so loud that we can't sit outside without hearing protection. The EIS needs to be clear about the extent of these environmental impacts, that they are happening now, and that they are unacceptable for those who live downtown. Given the possibility of continuing high-rise construction over the next 20 years, the ongoing adverse environmental effects of high-rise construction must be classified as permanent rather than temporary.

2. The job growth estimate has not been validated

The 20-year planning study, and the draft EIS, are based on a projected 70,000 additional jobs in Bellevue over the next 20 years. There is no explanation of the underlying assumptions such as employment trends, business and financial environment, migration, birth/death rates, and other factors that go into this forecast. The EIS needs to include details behind the 70,000 jobs forecast. If it turns out these figures cannot be validated, or are not accurate, then all future office space construction should be paused until the job and housing growth numbers are re-assessed.

3. Downtown Bellevue is at high risk of being over-built for office space

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

- The West Main project, three high-rise office buildings totaling one million square feet of office space, sit empty. Amazon, the principal tenant, is still considering their usage of this space.

I-22-1 Comment noted. See Common Response 1 Non Project vs Project Level SEPA Review.

I-22-2 See Common Response 13 Growth Targets.

I-22-3 The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning time frame.

I-22-1

I-22-2

I-22-3

I-22

COMMENT

RESPONSE

22-4 Comment noted.

I-22-3

- Microsoft is not renewing their leases for over one million square feet of office space in Bellevue. Several other companies have announced intent to sub-lease their office space.
- Working at home is a long-term trend and will continue to reduce the demand for office space, especially in the area of technology, which comprises many downtown jobs.
- Office vacancy rates in Bellevue are increasing. In Chicago and Los Angeles, vacancy rates have risen over the past few years past 20%. [NY Times]
- The average office occupancy rate across ten major cities in the U.S. is now around 50%. [Wall Street Journal ref. by NY Times]

We have seen what is happening in other cities such as San Francisco, Portland and Seattle: vacant buildings, increased crime, businesses and residents leaving, general deterioration of the downtown zone. Excess office space is a major factor. The Comprehensive Plan must prevent this from happening in our city.

Conclusion

I-22-4

In summary, my three concerns with the draft EIS are related to each other: (1) adverse environmental impacts are already happening in downtown Bellevue due to rampant high-rise construction; (2) the 20-year growth estimate for jobs has not been validated and may be too high; and (3) downtown Bellevue is going to end up with too much office space.

The image shown below is from our city's development services web page, the Major Projects List. It is a stylized portrayal of how the downtown skyline has looked for much of the past decade or two. There has been a ton of high-rise construction, and the numerous construction cranes proclaim even more high rises, until there is virtually no piece of earth left downtown that does not have a high-rise on it. This is not what we want for our city.



I-23

COMMENT

RESPONSE

Please see file attached.

I-23-1

a. Comment noted. b. The City can take measures to mitigate anticipated adverse impacts. Measures similar to those noted can be found in DEIS Chapter 8, Air Quality, and DEIS Appendix E, *Plants and Animals Memorandum*. Also see Common Response 8 – Air Quality. c. The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning time frame.

Comments Comprehensive Plan DEIS

Barbara Braun - 13609 SE 43rd Place

1. Alternatives:

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

I-23-1

I-23-2

See Common Response 8 Air Quality/GHG.

I-23-3

See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. A decision to require new or redeveloped buildings to include sustainability features will be based on application of the city's adopted codes, standards, and regulations, which are applied when individual development projects are proposed and undergo project-level review. The EIS supporting the Comprehensive Plan Periodic Update identifies potential mitigation for environmental impacts associated with the proposed growth alternatives identified and analyzed in the EIS.

2. Air quality and greenhouse gas emissions:

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

I-23-2

I-23-3

I-23

COMMENT

RESPONSE

I-23-4	d. Affordable housing, mitigations should meet the same GHG emissions building standards as other buildings.	I-23-4	Please see the prior response to I-23-2 regarding GHG emissions and the checklist for consistency with the area's climate planning documentation.
I-23-5	e. With more electrification, mitigations need to include requirements that our utility company offer programs to modulate peak electricity loads such variable rate schedules and "Demand Response." For example: <ul style="list-style-type: none"> i. The City should require PSE to create an hourly time variable rate schedule that would incent people to charge EVs and use other appliances at low demand times of the day. ii. The City should require PSE to provide a rigorous "Demand Response" program whereby they could remotely turn off water heaters, refrigerators, and other non-essential appliances at peak demand hours of the day to lessen peak loads on the grid. 	I-23-5	See DEIS Chapter 10, <i>Public Services and Utilities</i> , for information on impacts to the provision of electricity in Bellevue. The EIS concluded that there would be no significant impacts on electrical supply if the city is able to respond to additional demand for electricity as part of the planning process. The planning process includes working with Puget Sound Energy (PSE) to plan for growth.
I-23-6	f. The GHG emissions mitigations primarily evaluate transient impacts of construction such as dust and noise. Because construction activity levels will be very high during the study period and occurring across the city, more pervasive or "permanent" construction impact mitigations must also be put in place. For example, mitigations should include highly favorable or exclusive permitting for zero/low emissions developers as measured during construction as well as the built product. This should apply to both building developers as well as infrastructure developers. Construction could be considered low emissions if all vehicles and equipment used are electric, if all materials are non-polluting/renewable/sustainable, and if zero waste building practices are used.	I-23-6	Please see the prior response to I-23-2 regarding GHG emissions and the checklist for consistency with the area's climate planning documentation.
I-23-7	3. Land use patterns and urban form <ul style="list-style-type: none"> a. Mitigation of heat island and runoff impacts must be required for Mixed Use Areas, large square footage developments (commercial or public) and other high-density development. Mitigation regulations should include highly reflecting or green planted roofs, rainwater-detention to slow stormwater runoff or rainwater capture for use in irrigation, shade and shade tree scaping, pavement minimization, pervious pavement where pavement is allowed, and underground or multi story parking structures where vehicle parking is needed to minimize paved land. 	I-23-8	Please see Common Response 2 Tree Canopy, which describes the city's updated tree canopy assessment and relation to Bellevue's Land Use Code and City Code provisions and additional tree canopy technical report included as FEIS Appendix M.
I-23-8	b. All roads could be lidded with tree scaping.	I-23-9	See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space.
I-23-8	c. Tree canopy analysis was excluded from the DEIS. This is unacceptable. The canopy impact needs to be studied in the comp plan and must explicitly include plans/mitigations, policies and development regulations that require and ensure 40% tree canopy throughout the City.	I-23-10	See Common Response 2 Tree Canopy.
I-23-8	d. It is urgent to maintain our cooling tree canopy by getting better tree preservation ordinances in place asap, by requiring minimum tree canopy requirements for new and redevelopments and by preserving and protecting, in perpetuity, the current remaining trees and forested areas within the City.		
I-23-9	e. Tree preservation and canopy improvements need to be incorporated into development regulations. Developers should have to show that they've designed their buildings to keep the best (largest, oldest) trees on the property, and they should be required to replant and maintain trees to bring every lot up to a minimum tree canopy goal.		
I-23-10	f. Land needs to be identified in the plan for new parks, protected forests, and beaches. Zoning regulations should be developed to set new areas aside for these uses and to ensure our existing parklands and open spaces are not converted to residential or commercial uses.		
I-23-10	g. All current forests in Bellevue should be set aside in perpetuity as public forests. These forests should be managed to maximize their carbon sequestration services as well as for public access.		

I-23

	COMMENT	RESPONSE
I-23-11	h. Incentivize the development of remote work hubs in Mixed Use centers to reduce the amount of office space required and distribute workers throughout the City. This will increase the viability of small businesses in the Mixed-Use areas.	I-23-11 Comment noted.
I-23-12	4. Noise and Aesthetics a. Dense treescaping should be used as a traffic noise, air quality and aesthetics mitigation strategy.	I-23-12 See Common Response 2 Tree Canopy. See Common Response 6 Noise. In addition, mitigation measures identified in DEIS Chapter 6, <i>Aesthetics</i> , include the planting of vegetation as a screen.
I-23-13	5. Transportation a. Mitigations must include intensive intercity traffic congestion management.	I-23-13 Comment noted.
I-23-14	b. Mitigations must include a major investment in intercity mass transit to reduce VMT and GHG emissions.	I-23-14 Comment noted. See DEIS Chapter 8, <i>Air Quality</i> .
I-23-15	c. Mitigations should include tax or other disincentives to drive gas cars in Bellevue.	I-23-15 Comment noted. See DEIS Chapter 8, <i>Air Quality</i> .
I-23-16	d. Mitigate and manage congestion through programs in partnership with large businesses. For example, move commuters to mass transit by via high parking fees/taxes or parking restrictions based on license plate numbers (odd or even days), incent businesses to allow remote work, promote free use of public transit passes, etc.	I-23-16 Comment noted. The Choose Your Way Bellevue program provides tools and incentives to help employees choose a non-drive alone commute option.

I-24

COMMENT

RESPONSE

I-24-1 | I am one of the owners of 9 Lake., an office condominium located at lake Bellevue. We are located adjacent to the Wilburton Station. We own a very large parking lot which would be ideal for a Transit Oriented Development due to its close proximity to the station.
 I-24-1 | We have had a preliminary soils test conducted and the report looks very promising for construction. A TOD at this location would be an outstanding model for the City and the Light Rail. Therefore , I encourage you to look at the upzoning for this area because I feel that it has been accidentally overlooked in the past.
 Sincerely,
 Vicki Rauscher

I-24-1 | The Preferred Alternative studied in the FEIS includes future land use around Lake Bellevue with a RC-M character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.

I-25

COMMENT

RESPONSE

I-25-1 | I think Alternative #3 is important so we can plan accordingly for the future and long-term, provides access for more residents at a time when property values are so high that young people can't afford to live here. In addition, #3 basically has the same mitigation measures as #2 in almost all categories. I encourage you to look into all areas of Bellevue, not just Wilburton Hill. 140th along Bridle Trails has room for lots of expansion and it right next to Microsoft.

I-25-1 | Comment noted.
 I-25-2 | Comment noted.
 I-25-3 | Comment noted.

I-26

COMMENT

RESPONSE

I-26-1

Thank you for providing me a chance to comment on the proposed up-zone in the Wilburton neighborhood. As a long term small business owner, I cannot extend enough of my appreciation for the City's willingness to engage the property owners on the positives and negatives of the three proposed up-zones. I would encourage the city strongly to up zone and develop local housing and additional commercial space in this neighborhood. With the addition of light rail right in front of our parking lot at 9 Lake Bellevue the city and us have a chance to find a great development partner to convert a largely vacant lot that is generally half filled during the work week with new development that would benefit the community by lowering commutes and allowing people to work and live in this neighborhood. I look forward to partnering with the city further on developing Lake Bellevue in to a much better use for the community than a largely empty parking lot which will benefit the cities residents and increase our local tax base.

I-26-1

The Preferred Alternative studied in the FEIS includes future land use around Lake Bellevue with a RC-M character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.

I-27

COMMENT

RESPONSE

I-27-1

I am a property owner at 9 Lake Bellevue, and I feel strongly that to benefit the citizens of Bellevue, the City needs to include Lake Bellevue in ALL the alternatives, not just the third one. Our property is unique in that it is closest to the transit station. The citizens of Bellevue would benefit from Transit Oriented Development in the Lake Bellevue area. A rezone of the lake Bellevue area which is closest to the transit station should be considered separately and included in all options to allow people to live and work close to the Transit.

I-27-1

The purpose of having several alternatives in the EIS is to analyze the impacts of different growth options, including different options around Lake Bellevue.

I-28

COMMENT

RESPONSE

I-28-1

I am a property owner in Bellevue. I would like to see more development at Lake Bellevue on Alternatives 1 and 2 to better take advantage of the Wilburton light rail transit station that has been built there. Transit oriented development is efficient and just and therefore should be prominent on all alternatives. Increased density near the Wilburton station will increase the walkability to and from that station. Please consider changing the zoning near Lake Bellevue on all alternatives.

I-28-1

The purpose of having several alternatives in the DEIS is to analyze the impacts of different growth options, including different options around Lake Bellevue.

Thank You.

I-29

COMMENT

RESPONSE

I-29-1

I would like to comment about the Wilburton Vision. I believe we need to maximize TOD opportunities around the new Light Rail Station. I am one of the owners at the Nine Lake Bellevue Condominium. Our parking lot is right next to the new Light Rail Station. It should be planned for intense TOD. In fact I am surprised that development around Lake Bellevue is excluded in 2 of the three proposed alternatives. All the planning alternatives for the properties around Lake Bellevue, especially those right at the Station, should include mid rise and high rise office and residential options.
Thank you for the opportunity to comment

I-29-1

The purpose of having several alternatives in the DEIS is to analyze the impacts of different growth options, including different options around Lake Bellevue.

I-30

COMMENT

RESPONSE

I-30-1 | Re: DEIS for the Comprehensive Plan and Wilburton Vision
Please consider developing (“TOD”) opportunities around the new Light Rail Station. I am an owner at the Nine Lake Bellevue Condominium and our parking lot is right next to the new Light Rail Station. The property is underutilized and it should be planned for intense TOD to use it most effectively for the community. All three of the City’s planned growth alternatives for the properties around Lake Bellevue, especially those right at the Station, should include mid-rise and high rise residential and office options. We would like the third plan which includes this. Consider the Lake Bellevue area for more dense zoning in each of the alternatives. Thanks for your consideration.

I-30-1 | The purpose of having several alternatives in the DEIS is to analyze the impacts of different growth options, including different options around Lake Bellevue.

I-31

COMMENT

RESPONSE

I-31-1 | I would like to see Bellevue adopt Alternative 3 so that housing and small commercial sites can be spread throughout the city’s (currently) low-density residential areas. When there are more places to walk or bike close to where people live, this gets cars off the roads, reducing greenhouse gas emissions and lessening the need for expanding the auto transportation infrastructure. It is more financially sustainable for affordable housing if residents don’t need to own cars. I’d like to see ACU’s (Accessory Commercial Units) allowed for small shops, cafes, offices, etc., throughout neighborhoods. The most desirable cities have medium density, not all the housing bunched in one area. Think Paris, London, Montreal. With good policies that require green space, trees, and multi-modal transportation routes, the density can be increased in a way that results in vibrant neighborhoods that are able to support local businesses.

I-31-2 |

I-31-3 |

I-31-4 | Please make sure that the alternatives require a robust network of pedestrian and bicycle routes to get everywhere in the city.

I-31-1 | Comment noted.

I-31-2 | Comment noted. See Common Response 4 Housing Alternatives.

I-31-3 | Comment noted. See Common Response 4 Housing Alternatives.

I-31-4 | Each action alternative refers to the Mobility Implementation Plan that described the network and performance for all modes. Much of the anticipated growth is in proximity to existing and planned transit service and pedestrian and bicycle network facilities.

I-32

COMMENT

RESPONSE

I-32-1

From: Plummer David F. <pdf@coconet.net>
Sent on: Saturday, May 27, 2023 7:07:47 PM
To: Pitman, Reilly <RPitman@bellevuewa.gov>
CC: onbellevuewa@googlegroups.com; PhyllisWhite <phylliswhite@coconet.net>
Subject: Fwd: City of Bellevue Proposed Comprehensive Plan for 2024-2044

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

Hello Mr. Pitman!

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

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

RSVP,
 David Plummer

Begin forwarded message:

From: "Plummer David F." <pdf@coconet.net>
Subject: City of Bellevue Proposed Comprehensive Plan for 2024-2044
Date: May 26, 2023 at 9:03:10 PM PDT
To: RPitman@bellevuewa.gov
Cc: onbellevuewa@googlegroups.com; Maskin Rebecca <maskin@kingcounty.gov>; "dandia.h@ucci@kingcounty.gov" <dandia.h@ucci@kingcounty.gov>

Hello Mr. Pitman!

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

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

RSVP,
 David Plummer

I-32-1

This SEPA EIS process is intended to provide environmental information and analysis for City decisionmakers as the city develops updates to the Comprehensive Plan. Specific policy updates will be informed by the analysis in the EIS, including but not limited to the analysis of alternatives, potential mitigation measures, and the environmental impacts associated with the various growth alternatives.

I-32-2

From: Plummer David F. <pdf@coconet.net>
Sent on: Saturday, May 27, 2023 7:39:30 PM
To: Pitman, Reilly <RPitman@bellevuewa.gov>
CC: King, Emil A. <EAKing@bellevuewa.gov>; thmj@ncc@bellevuewa.gov
Subject: Housing Element Amendments to Comprehensive Plan Periodic Update

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

Hello Mr. Pitman!

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

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

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

RSVP,
 David Plummer

I-32-2

The details of what has been analyzed in the EIS are contained in the Draft and FEIS documents. Updates to the Comprehensive Plan policies and maps will be informed by the environmental analysis in the EIS. Decisions about the Comprehensive Plan are made after the conclusion of the EIS process.

I-32-3

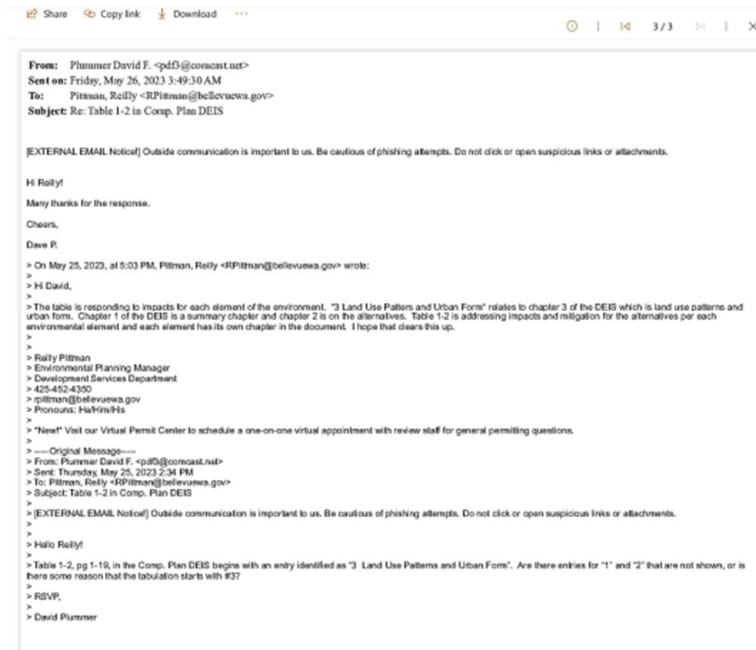
I-32-3

Please see Common Response 4 Housing Alternatives, which describes additional analysis related to HB1110 and HB 1337.

I-32

COMMENT

RESPONSE



I-33

COMMENT

RESPONSE



I-33-1

Please refer to the King County Countywide Planning Policies for information on how these targets were developed. The targets were developed in coordination with King County, other King County cities and the Puget Sound Regional Council as required by the state Growth Management Act. The Urban Growth Capacity Report contains information on how capacity was calculated for the existing capacity. See Common Response 13 Growth Targets.

I-33-1

I-33

COMMENT

RESPONSE

From: Joe Coolegde <jc8176@gmail.com>
Sent on: Friday, May 19, 2023 11:16:13 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
CC: Joe Coolegde <jc8176@gmail.com>
Subject: Comments on the draft EIS

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

Greetings,

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

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

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

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

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

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

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

Sincerely,
 Joe Coolegde

I-33-2

I-33-3

I-33-2

See DEIS Chapter 8, *Air Quality*. Section 8.3.2 discusses short-term construction impacts and identifies this as a potentially significant adverse impact in all action alternatives. It is identified as a short-term impact since construction activities temporarily affect air quality. Construction mitigation measures are subsequently identified in DEIS Section 8.4.2. Additionally, the document is a non-project EIS that analyzes proposals and alternatives broadly across the study area. As described in DEIS Chapter 1, Table 1-1, detailed analysis and mitigation related to impacts of specific construction proposals are outside the scope of a non-project EIS.

I-33-3

The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning timeframe.

I-34

COMMENT

RESPONSE

I-34-1

Common Response 7 Parks and Open Space for how the impact on open space was analyzed. Since new development and redevelopment projects in the city require stormwater best management practices, which include increasing tree and vegetation cover and reducing impervious surfaces, the alternatives provide opportunities to reduce the risk of urban heat islands that currently exist in many neighborhoods. See Common Response 21 Stormwater Infrastructure.

I-34-2

See Common Response 2 Tree Canopy. See Common Response 9 Plants and Animals.

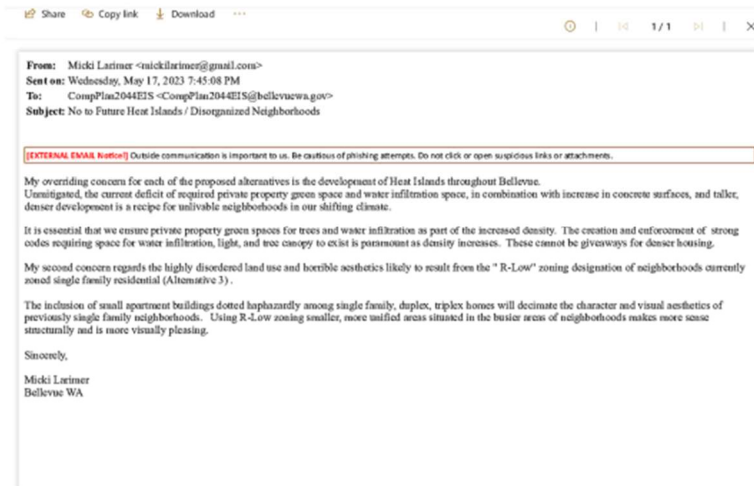
I-34-3

See Common Response 4 Housing Alternatives. See additional information on Aesthetics provided in the FEIS Chapter 6, *Aesthetics*.

I-34-1

I-34-2

I-34-3



I-35

COMMENT

RESPONSE

I-35-1

The DEIS incorporates a multimodal approach to provide a transportation network that accommodates all modes. Where new growth is planned, an emphasis is on active transportation modes including options for walkability and access to transit.

I-35-1



I-36

COMMENT

RESPONSE

I-36-2	<p>The DEIS needs to be amended to consider the full impact of HB1110. The impact of the change in work patterns (fully remote work/part week work from home/people moving out of Bellevue to Eastern WA and other states) following the pandemic is not yet fully understood. More time is needed to research and understand this. E.G. will future businesses be located in Bellevue if their staff are all/mostly remote, will staff ever fully return to the office, will Bellevue see a decreased need for office space along with less need for housing, will people choose to live in dense cities if their jobs are no longer there, how does this affect transportation needs (will we see an increased need for parking from office staff who now commute into the office part time from far away rural homes, who previously lived nearby and didn't need a car). Have you fully studied the impact of the DEIS on Bridle Trails which is a historic, unique, rural and equestrian neighborhood adjacent to the Bridle Trails State Park? The DEIS should consider the impact on our landmarks, views, historical sites, our visual resource.</p>	I-36-1	See Common Response 4 Housing Alternatives which discusses HB 1110 and HB 1337.
I-36-1		I-36-2	See Common Response 11 Impact of COVID-19.
I-36-3		I-36-3	Four select areas of the city (Eastgate, Lake Hills, Lake Heights, and Sherwood Forest) were surveyed for historic resources. See DEIS Chapter 6, <i>Aesthetics</i> , for a discussion of views and visual resources. Finally, this document is a non-project EIS that analyzes the growth alternatives and potential mitigation for environmental impacts across the study area. Impacts to landmarks and historical sites outside of Eastgate, Lake Hills, Lake Heights, and Sherwood Forest will be analyzed on a project-by-project basis when individual projects are proposed, more information allowing for meaningful environmental review is available to the city, and the individual proposals undergo project-level environmental review under SEPA. See Common Response 1 Non Project vs. Project Level SEPA Review.

I-37

COMMENT

RESPONSE

I-37-1	<p>The plan for the downtown Bellevue QFC needs to have green space and parking</p>	I-37-1	Comment noted.
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I-38

COMMENT

RESPONSE

I-38-1 I would like to submit my support for Alternative 0 regarding the proposed development of the Wilberton neighborhood. I have lived in Bellevue for thirty years and I enjoy living in a city in a park. We are facing the threat of severe climate change, and destroying the trees and over-urbanizing our city is not in the best interests of our population. It is the duty of elected officials to protect our city from overly ambitious development which will ultimately ruin the character of our city. In 2022 voters passed an \$85 million levy to protect open spaces, preserve wildlife corridors and to acquire new open spaces. Let's honor the voters' wishes and stop unnecessary destruction of the environment. Also let's save the meadow at Airfield park in the Eastgate neighborhood of Bellevue. Thanks for your consideration.

I-38-2

I-38-3

I-38-1 Comment noted.

I-38-2 See Common Response 2 Tree Canopy. See Common Response 12 Impacts of Climate Change.

I-38-3 Comment noted.

I-39

COMMENT

RESPONSE

I-39-1 1. The City web site states that the final EIS (on the 2024 Comp. Plan update) will be issued in August: is this August 2023?

2. Is the current DEIS (dated April 2023) a draft EIS of the proposed 2024 Comp. Plan; if so, how can I get a copy of the proposed 2024 Comp. Plan?

I-39-1 As noted in DEIS Chapter 1, *Summary*, on page 1-17, the FEIS was planned to be issued in 2023. The release date was delayed due to the need for additional analysis related to state legislation and in response to comments. The commenter is correct that the DEIS is for the Comprehensive Plan Periodic Update. The proposed land use maps are included in DEIS Appendix B. Following the EIS process, the city will develop specific edits to the Comprehensive Plan Land Use Map and Comprehensive Plan that will be informed by the environmental review in the EIS and the subject of public meetings and public hearings before the Planning Commission and City Council.

I-40

COMMENT

RESPONSE

I-40-1 Do not build any further! Our infrastructure can't handle it!!!! When a 10min commute has turned into an hour to an hour and a half... the quality of life in this community has now become a disgrace!

I-40-1 Comment noted.

I-40-2 Comment noted.

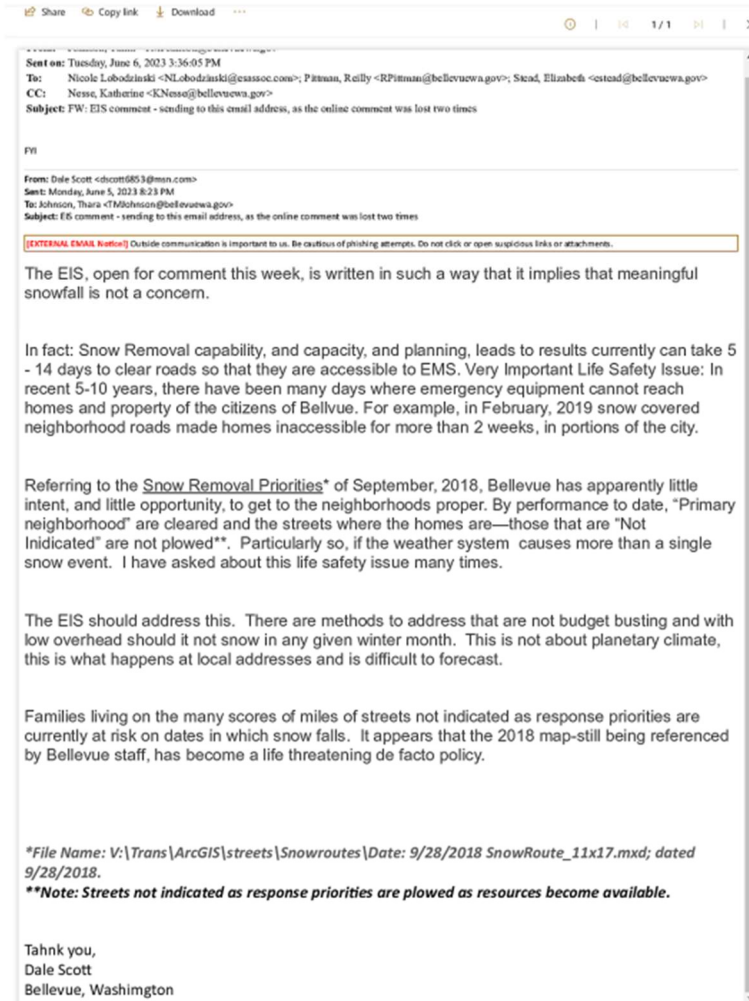
I-41

COMMENT

RESPONSE

I-41-1

This topic is outside the scope of analysis for this EIS. For general impacts to the city's public services, see DEIS Chapter 10, *Public Services and Utilities*. The chapter notes that growth would occur incrementally and be addressed during the city's regular capital planning efforts.



I-41-1

I-42

	COMMENT		RESPONSE
I-42-1	Do not eliminate small businesses we need the auto repay and other small retailer/ specialty shops. keep the bell red district as is. No more high rise or apartments.	I-42-1	Comment noted.
I-42-2		I-42-2	Comment noted.

I-43

	COMMENT		RESPONSE
I-43-1	Regarding plans for multi-unit housing on the east side of 120th NE, just south of NE 8th Street and up to Main Street:	I-43-1	Comment noted. See DEIS and FEIS Chapter 6, <i>Aesthetics</i> .
	DO NOT allow any building height to exceed a height that would impair current views of buildings at the top of the hill. This means NO VISUAL IMPAIRMENT from the ground floor or higher of current buildings at the top of the hill. Anything exceeding this proposed height would impair the panoramic views these people have of the city.	I-43-2	Comment noted.
	You would not let anyone block someone else's view of Lake Washington or Lake Sammamish....then why would you propose something that would take the panoramic view away from these residents of the Wilburton community?		
I-43-2	The proposal for "up to 16 stories" in height in the EIS is unacceptable and shows disregard & disrespect for the Wilburton community who live at the top of the hill.		
	We do not need or want the eastside of 405 to reflect the downtown core. Many of us live in the Wilburton neighborhood because we enjoy the quiet, and the sense of community, not the sterile core of downtown.		
	This area is an "entry" into the residential Wilburton community and should reflect a scaled down version of the current EIS proposals.		

I-44

	COMMENT		RESPONSE
I-44-1	Alternative 0 seems like the best option for the city.	I-44-1	Comment noted.

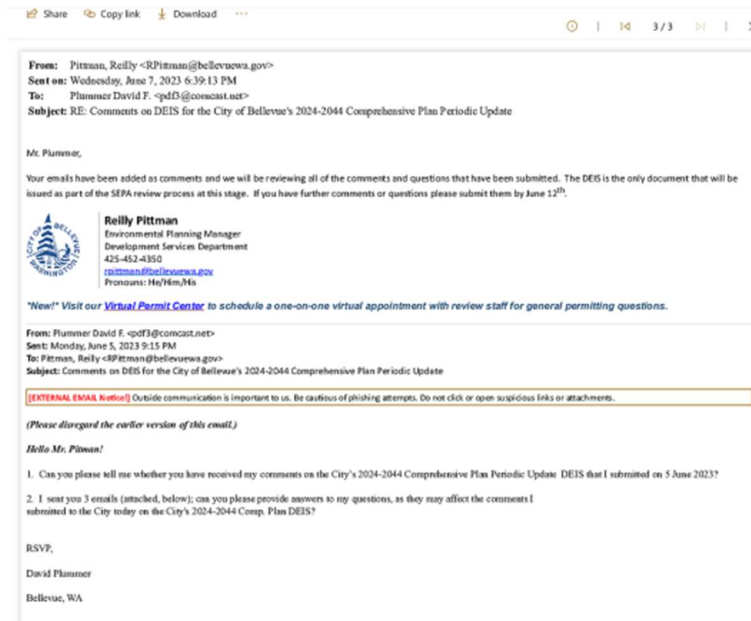
I-45

COMMENT

RESPONSE

I-45-1

Yes, your comments were received. The commenter's letters are responded to under comments I-32, I-50, I-129, and I-161 in this document.



I-45-1

I-46

COMMENT

RESPONSE

I-46-1

Micro-apartments are a great start toward affordability. To go a step further and help affordability for families, consider amending building codes so that point access blocks are easier to build.

I-46-1

Comment noted.

I-46-2

Comment noted.

I-47

COMMENT

RESPONSE

After reviewing the policies as well as the alternatives, I have concluded my thoughts on each of the topics; housing, connection, environment, and accessibility.

I-47-1 See Common Response 4 Housing Alternatives.

I-47-2 Page 9-10 of the DEIS, Table 9 provides a high-level summary of potential noise levels from four freeway segments that would support commuter traffic increases resulting from development under each of the alternatives. Because the increase in noise along all roadways would be less than 10 dBA, the impact with respect to commuter transportation noise would be less than significant.

I-47-1 It has become clear that housing is a major worry since relocating from Minnesota to Washington. Upon careful examination of the project's vision and policies, I am able to assert with confidence that the general satisfaction of the people will not be achieved. While the accessibility of affordable housing is on the rise, it is imperative that we remain mindful of the fact that the essence of Bellevue's appeal lies in its family-centric community. As for the environment, I-47-2 The substantial presence of commuters in Bellevue for occupational reasons constitutes a noteworthy factor in the expansion of noise and pollution levels within the area. The adoption of upzoning policies, density augmentation, removal of parking mandates, and streamlining of construction procedures I-47-3 would lead to a significant rise in the number of residential units in the Bellevue region. Consequently, this would facilitate a greater populace while alleviating the adverse effects of vehicular congestion, environmental contamination, and acoustic disturbance.

I-47-3 See Common Response 19 Zoning Details.

I-48

COMMENT

RESPONSE

I-48-1 It seems figure 11-4 "Bicycle Network LTS Vision" is incorrect. It appears figure 11-2 "Performance Management Areas" was incorrectly included again at that location. I would like to see the bike LTS vision picture, thank you.

I-48-1 Figure 11-4 in the DEIS is incorrect and has been replaced with the correct figure in the FEIS. The vision for the bicycle network is included in the Mobility Implementation Plan.

I-49

COMMENT

RESPONSE

<p>I-49-1</p> <p>I-49-2</p>	<p>Hi! After reviewing the environmental impact statement I had a main I hope you address moving on. First, the need for affordable housing within Bellevue. In the focus to increase housing units, it is important to acknowledge how cost of living has made affording houses in this area so difficult. Because of this, I hope you also include affordable housing options in this growth. Other than that I really appreciated the mention of eco-friendly alternatives being used.</p>	<p>I-49-1</p> <p>I-49-2</p>	<p>See Common Response 4 Housing Alternatives.</p> <p>Comment noted.</p>
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I-50

COMMENT

RESPONSE

5 June 2023

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

Hello Mr. Pittman!

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

1. General, applicable to entire DEIS:

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

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

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

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

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

I-50-1 The EIS analyzes the informed buildout of the commercial and housing capacity. The housing and job targets remain those adopted in the King County Countywide Planning Policies in all alternatives. Buildout of the Action Alternatives is not expected by 2044, but the environmental impacts associated with the informed buildout of the commercial and housing capacity under each Alternatives has been disclosed and analyzed in the EIS.

I-50-2 Comments on the Wilburton study area were encouraged, submitted, and received during the Comment Period for the DEIS.

I-50-3 The updates to the Comprehensive Plan will be informed by the environmental analysis in the DEIS. The information used in the analysis of the alternatives is contained in the EIS document.

I-50-4 The regulatory framework and background of the 35,000 housing units and 70,000 jobs is described in Section 2.3.2, Regulatory Framework in the DEIS (see page 2-8). This section acknowledges that the housing and job capacities are based on King County Countywide Planning Policies and the county's 2021 Urban Growth Capacity Report. The targets are based on actual growth projections prepared by the State of Washington Office of Financial Management. DEIS page 2-9 explains a number of factors, which resulted in higher targets for the No Action Alternative.

I-50-5 The other new planning requirements referred to are in RCW 36.70A.070(2).

I-50-1

I-50-2

I-50-3

I-50-4

I-50-5

I-50

COMMENT

RESPONSE

I-50-5	<p>and a range of housing types. However there is no specific reference to the source or the definition of the “other new planning requirements”, nor any comparison of HUs produced under the No Action Alternative to the specific requirements referred to; this omission should be corrected. In addition, the City staff has provided no information on what types and numbers of HUs would be produced <i>yearly</i> by private contractors and builders, or by City actions under the No Action Alternative during the time period (2024-2044) covered by the comprehensive plan.</p>	I-50-6	See Common Response 4 Housing Alternatives.
I-50-6	<p>4. Para. 2.3.4, pp 2-11 and 2-12:</p>	I-50-7	See Common Response 4 Housing Alternatives. See Common Response 13 Growth Targets.
I-50-7	<p>4.1 WA OFM has recently (April 2023) released their Postcensal Estimates of WA State housing units; this data shows that Bellevue had approximately 65,900 total housing units (HU) in 2022; included in this total are the approximately 2,100 HU that the City claims were added to the City’s inventory during 2017-2022. Thus, the City’s total HU supply in 2044 should approach 106,900 units under the No Action Alternative, a value that provides ample HU growth capacity for the City.</p>	I-50-8	See DEIS Chapter 4, <i>Plans and Policies</i> , which contains information on how the alternatives align with regional plans such as the King County Countywide Planning Policies. The city’s Comprehensive Plan must be in compliance with the State Growth Management Act, the Puget Sound Regional Council’s Vision 2050, and King County’s Countywide Planning Policies. All of these documents and regulations have been updated with new requirements and the city must update the Comprehensive Plan to be in alignment with them.
I-50-8	<p>4.2 The text in this para. states that this alternative does not meet other new planning requirements, but there is no explanation of what the new requirements are, and what the City’s HU/jobs target values (under the new requirements) would be. These omissions should be corrected by listing the new requirements, and by identifying the new City HU/jobs target values. It should be noted that the King County 35,000/70,000 housing/jobs targets are specific values, they are not minimum values and are required to form the basis for the proposed 2024 version of the City’s comprehensive plan.</p>	I-50-9	Table 2-12 on FEIS Chapter 2, <i>Preferred Alternative</i> , page 2-33 has been revised to clarify the theme for Alternative 0 (No Action).
I-50-9	<p>5. Table 2-12, pg 2-33: 5.1 In the Theme row of this table, the table should be revised to describe what the “Current plan” theme is for Alternative 0; simply stating “Current plan” does not provide sufficient information to compare it with the other 3 alternatives.</p>	I-50-10	Future housing growth under the No Action Alternative would be consistent with current plans, zoning, and development regulations. Alternative 0 applies future growth to existing conditions using the policies and zoning that are in place today and focuses that growth primarily within Downtown and BelRed. Growth under the No Action Alternative would be consistent with recent development trends and housing typologies would consist primarily of larger apartment buildings with studios and one-bedroom units; housing diversity would continue to be limited in single-family areas.
I-50-10	<p>5.2 Why would Alternative 0 restrict housing types to residential buildings with studios and 1-bed units; why would other residential buildings with 2 or 3 bedroom units not be built?</p>	I-50-11	Under Alternative 0, voluntary inclusionary affordability incentives allow extra density to market-rate projects in exchange for affordable units, generally 5%–10% of projects.
I-50-11	<p>5.3 What does the entry “Less than 10%” mean in the Housing Affordability row for Alternative 0?</p>	I-50-12	The city targets are 35,000 housing units and 70,000 jobs. The paragraph referred to explains why the capacity calculation is different from the capacity calculated in the Urban Growth Capacity Report.
I-50-12	<p>6. Para. 4.2.3, pg. 4-5: 6.1. The City states in this paragraph that the City has determined new housing growth targets because: (a), the City does not include a market factor; (b), the City has added capacity in two areas; (c), projects are developing at higher densities than assume in the UGC Report; (d), redevelopment of certain properties; and, (e), a more generous City redevelopable threshold. Since the City was responsible for developing and submitting to King County the 35,000HU and 70,000 jobs targets, the DEIS should include a more detailed explanation of what the quantified impact is of each of the 5 factors, and the dates they became effective. The City should also describe what the new City targets are if they are different from the King County approved values (35,000 housing units, 70,000 jobs).</p>	I-50-13	See Common Response 4 Housing Alternatives. See Common Response 13 Growth Targets.
I-50-13	<p>6.2. Exhibit 55 in the 2021 King County Urban Growth Capacity Report (June 2021, ratified 6 April 2022) shows that Bellevue has more than adequate capacity to meet the 2019-2044 housing and jobs targets (35,000 HU, 70,000 jobs). Thus, there is no need to consider changes in the Comprehensive Plan that would permit development of</p>		

I-50

COMMENT

RESPONSE

I-50-14 See Common Response 13 Growth Targets. See DEIS Chapter 5, *Population and Employment*.

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

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

Sincerely,

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

David F. Plummer
David F. Plummer

14414 NE 14th Place
Bellevue, WA. 98007

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

I-50-14

I-50

COMMENT

RESPONSE

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

23-May-23

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

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

I-51	COMMENT	RESPONSE
I-51-1	I think that this is a very help plan to help build a livable city in. this plan seems to be in the best interest of making the future year representative for everyone in the community.	I-51-1 Comment noted.
I-52	COMMENT	RESPONSE
I-52-1	Alternative 3 for the Housing: Diversity and Choice; Alternative 3 has much higher jobs and housing available than alternative 2 yet transit numbers near housing are almost the same. What can be done to improve the transit numbers near housing for Alternative 3? Does the issue reside due to lack of public transit or due to location of housing and lack of transit in said area?	I-52-1 See FEIS Chapter 11, <i>Transportation</i> , for measures the City can take to reduce the impacts of growth, including adding more transit options (provided by King County Metro and Sound Transit) which residents and employees could access by walking or bicycling.
I-53	COMMENT	RESPONSE
I-53-1	The city is planning to allow a developer to build 15 towers to replace Bellevue Village (QFC and Bartells) and property north of the shopping area (currently Le Chateau).	I-53-1 Comment noted.
I-53-2	<ul style="list-style-type: none"> - Although the images show rooftop "green areas" on some of the buildings, there is no evidence of sufficient ground level outdoor green space set aside to support the number of residents (and dogs) who need get outside near to their apartments/condo's. - The closest park (the Downtown Park) is too far from most of the towers in the plan for it to be used by dog walkers. 	I-53-2 Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. In addition, see Common Response 7 Parks and Open Space for a discussion of how addition parks and open space, including green space, would be provided under the proposed Comprehensive Plan.
I-54	COMMENT	RESPONSE

I-53

COMMENT

RESPONSE

I-54-1

Though the City of Bellevue’s Environmental Impact Statement draft appears to stem from the motivation improve human lifestyle and maintenance, it seems to lack an important factor: affordable housing. The statement is clearly focused on creating the best possible living conditions for its residents, and even hoping to gain more by supplying additional housing units and jobs within its city limits. But, the vision for growth seems unable to reach its full potential considering the city’s reputation of expensive living conditions in most of its areas. Many people already struggle to afford housing in urban areas around Washington, and simply adding additional spaces doesn’t live up to the Comprehensive Plan’s motto: “Building A Livable City for All.”

I-54-1

The DEIS includes three action alternatives that analyze affordability tools and increased incentives across the city to encourage more affordable housing at a range of income levels. The FEIS provides further analysis on the Preferred Alternative and mandatory and voluntary inclusionary housing affordability tools. See Common Response 4 Housing Alternatives for how the housing was studied in the EIS.

I-55

COMMENT

RESPONSE

I-55-1

Alternative 3 I believe is a great option. Allowing growth to be spread out through the city but still focusing on transit and jobs is really important. The growth shown in the study area shows a large amount of new jobs as well as housing units and seeing the idea for the whole city is large. 200,000 jobs coming from this growth would help so many people. SO excited to see what comes from this

I-55-1

Comment noted.

I-56

COMMENT

RESPONSE

I-56-1

Increasing housing units within Bellevue is a great step towards creating more growth within Bellevue. However, isn't accessibility an occurring issue? Housing in Bellevue is becoming increasingly expensive and the values of different properties are rising. How do you plan to increase housing units while making them accessible for someone in the average financial situation?

I-56-1

See Common Response 4 Housing Alternatives.

I-57

COMMENT

RESPONSE

I-57-1 | The city needs to do more regarding affordable housing. There should be a fee on all new construction with no wavier, to go towards low and middle income housing. All new construction of multi-dwellings, 4% must be for low and moderate income residents. Again, no exceptions. And finally, the city should look at Canada's example and ban residential ownership of homes for at least 2 years for foreigners.

I-57-1 | See Common Response 4 Housing Alternatives.

I-58

COMMENT

RESPONSE

I-58-3 | I'm thrilled to live in Bellevue and love that unlike many cities we continue to enjoy a boom in growth. With that being said I would ask that considerations be made as to how the construction of buildings is being treated in consideration to other major cities (New York). I would like to see a better job in mitigating street closures, sidewalk closures and overall accessibility if there are better ways to do that.

I-58-3 | This is outside the scope of analysis for this EIS.

I-58-1 | In addition, I'd like to see an effort to enforce some form of affordability for small businesses to be a requirement in any retail space plans. There should be a certain set of spaces required or encouraged (via tax break etc.) to allow for small businesses to rent and thrive in Bellevue.

I-58-1 | DEIS Chapter 5, *Population and Employment*, addresses the potential impacts of each alternative. Although no mitigation is required, the city could consider mitigating the displacement of existing small businesses, which include exploring programs to ensure that affordable office and retail spaces are available, and to consider financial incentives (see DEIS page 5-27).

I-58-2 | Last but not least I believe there needs to be an exploration on a permanent closure of Old Bellevue Main Street for through traffic to encourage more walkability and year round patio space.

I-58-2 | Main Street in Old Bellevue serves important functions for all modes in a manner that is reasonably comfortable and safe for everyone. To close this street on a permanent basis is outside the scope of this EIS.

I-59

COMMENT

RESPONSE

I-59-1 | We desperately need a senior center in downtown Bellevue, one that would provide activities like dancing games exercise groups outings etc

I-59-1 | Comment noted.

I-60

COMMENT

RESPONSE

I-60-1 | The house prices are too high.

I-60-1 | Comment noted. See Common Response 4 Housing Alternatives.

I-61

COMMENT

RESPONSE

I-61-1 | I own 5 rental homes in Bellevue. I am grateful to have access to these plans. My concerns are: 1) if the freeway is expanded into Factoria and impacts Concord Hill HOA. 2) Trees. Thank you for working on the tree canopy. I am horrified with all the trees that continue to come down. I don't know what you can do to monitor if people are taking down more than the allotment annually. I also think this is a very bad measurement to use; over a few years one's lot can be emptied of trees. Look at SpiritRidge -- all the trees down also due to the big homes being built after the tear down. 3) water cost. People don't want to pay for water to keep bushes and trees alive. Our water costs are terrible. I have a friend who moved to Pasco; she pays \$99.00 to water during the growing season. She has a green lawn and all kinds of wet side of the mountain plants. I am horrified that these old dam laws are still in place. We need to change these laws at the state level and keep water available to people to keep our trees and shrubs alive

I-61-2 |

I-61-3 |

I-61-4 |

I-61-1 | Comment noted.

I-61-2 | See Common Response 2 Tree Canopy.

I-61-3 | This is outside the scope of analysis for this EIS.

I-61-4 | Comment noted. See DEIS Chapter 10, *Public Services and Utilities*.

I-62

COMMENT

RESPONSE

- I-62-1 | As a resident, I care about homelessness and crime. The projected increase in crime under each plan is not discussed. The projected increase in homelessness for each plan is not discussed. Some mention of ARCH and other services for give housing to homeless is discussed, but this does not work and has not worked where implemented.
- I-62-2 |
- I-62-3 | I am left to assume that every measure that increases population in Bellevue and increases access to Bellevue will increase crime and homelessness.

- I-62-1 | The topic of homelessness is not an environmental issue and thus is outside the scope of analysis for this EIS. The EIS analysis does include the analysis of housing capacity. See Common Response 4 Housing Alternatives. The DEIS did discuss potential for the alternatives to increase crime as future growth under each alternative would result in an increase in calls for police service (see DEIS Chapter 10, *Public Services and Utilities*). As concluded in DEIS Chapter 10, page 10-30, no significant unavoidable adverse impacts on public services, including police, would occur under each of the alternatives.
- I-62-2 | See Common Response 4 Housing Alternatives.
- I-62-3 | The DEIS did discuss potential for the alternatives to increase crime as future growth under each alternative would result in an increase in calls for police service (see DEIS Chapter 10, *Public Services and Utilities*). As concluded in DEIS Chapter 10, page 10-30, no significant unavoidable adverse impacts on public services, including police, would occur under each of the alternatives. The increase in demand for police and fire department services due to future growth under each alternative will be addressed through the City's regular capitol facility planning process.

I-63

COMMENT

RESPONSE

I-63-1	On one hand I truly appreciate the effort to gather feedback from all of us. On the other hand, I feel very frustrated because many of us have been giving the same feedback for many years and all we see is the conditions worsening:	I-63-1	Comment noted.
I-63-3	- Police and Fire Department underfunded for the enormity of the task they have with the growth we've been experiencing	I-63-3	As discussed in DEIS Chapter 10, <i>Public Services and Utilities</i> , page 10-30, the increase in demand for police and fire department services due to future growth under each alternative will be addressed through the City's regular capitol facility planning process.
I-63-2	- No real affordable housing for key people in our community like teachers, health professionals, police, fire-fighters, etc.		
I-63-4	- No clear plan to support the increasing amount of people and car traffic in Bellevue	I-63-2	See Common Response 4, Housing Alternatives.
I-63-5	- Meanwhile, no real accountability for some of the large companies driving all that growth		
I-63-5	To be clear, it's great to live in a town that has been growing like Bellevue but, the lack of real planning and focus on the people (not the corporations) creates the possibility for a very difficult future.	I-63-4	See FEIS Chapter 11, <i>Transportation</i> , for measures the City can take to reduce the impacts of growth, including adding more transit options (provided by King County Metro and Sound Transit) which residents and employees could access by walking or bicycling. The Bellevue Mobility Implementation Plan provides for sidewalks on both sides of all arterial streets. Within neighborhoods on local streets, programs such as the Neighborhood Sidewalk Program and Neighborhood Enhancement can provide funding for missing sidewalk segments, with neighborhood support.
		I-63-5	Comment noted.

I-64

I-64-2 | Traffic jam in Factoria area is pretty bad. Side walks in the nearby
I-64-3 | neighborhood is also very limited. The city might need to slow down on
bringing more people or businesses into the area.

COMMENT

RESPONSE

- I-64-1 Comment noted.
- I-64-2 The Bellevue Mobility Implementation Plan provides for sidewalks on both sides of all arterial streets. Within neighborhoods on local streets, programs such as the Neighborhood Sidewalk Program and Neighborhood Enhancement can provide funding for missing sidewalk segments, with neighborhood support.
- I-64-3 See FEIS Chapter 11, *Transportation*. This describes the city-wide congestion impacts based on the informed buildout modeling utilized in the EIS for each growth Alternative. Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the environmental impacts, including transportation impacts, associated with the growth Alternatives across the study area as well as potential mitigation measures. An analysis of the specific traffic impacts of projects will take place on a case-by-case basis when individual projects are proposed and undergo project-level environmental review under SEPA. The city acknowledges that the informed buildout analysis contained in the EIS is a conservative approach which analyzes growth that may not actually occur during the 20-year planning period.

I-65

COMMENT

RESPONSE

I-65-2	<p>Hello, I can speak only generally as document navigation is unwieldy. I want to speak in favor of all procedures that keep greenhouse gases and improve public transportation and bike path accessibility. In the Netherlands, the bike paths are also used by citizens in motorized wheelchairs, and that's something I would like to see here. It's a two-for-one benefit. Lastly, I am in favor of accessible housing for those who struggle with finding shelter and believe that there should be an on-site mental health triage to help keep those buildings and surrounding areas safe. It must be feasible for property managers to remove residents who pose a physical threat to themselves or anyone else, and for those residents to get the treatment they need.</p>	I-65-1	Comment noted.
I-65-1		I-65-2	See Common Response 8 Air Quality/GHG. See FEIS Chapter 11, <i>Transportation</i> , for measures the City can take to reduce the impacts of growth, including adding more transit options (provided by King County Metro and Sound Transit) which residents and employees could access by walking or bicycling.
I-65-3		I-65-3	See Common Response 4 Housing Alternatives.

I-66

COMMENT

RESPONSE

I-66-1	<p>We have lived in Newport Hills for 38 years (since 1984). In 1984 the shopping center had (2) banks, (2) gas stations, (2) grocery stores, a liquor store, a drugstore, a Dairy Queen, a barbershop, a hair salon and a few other businesses. Then Factoria added a QFC and Newcastle added a Safeway and a QFC. Now we have just one gas station, no banks, no drugstore, and no barbershop. I think it's time to re-zone this property to accept apartments above retail spaces like we see in Juanita and other places. In my opinion it's a myth that there will be so much extra traffic that it will be gridlock. Many apartment dwellers will use the bus and shopping trips will be reduced because the stores will be within walking distance. Steve Kunkel</p>	I-66-1	See Common Response 19 Zoning Details.
I-66-2		I-66-2	See FEIS Chapter 11, <i>Transportation</i> .

I-67

COMMENT

RESPONSE

I sent this letter to the City in 2016 but never got a response.

I-67-1 See Common Response 19 Zoning Details.

July 7, 2016

To Whom It May Concern:

Re: Newport Hill Shopping Center

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

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

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

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

I-67-2 Comment noted. See FEIS Chapter 11, Transportation.

I-67-1

I-67-2

I-67

COMMENT

RESPONSE

I-67-3 Comment noted.

I-67-4 Comment noted.

I-67-3

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

I-67-4

Next, is there any hope that we will ever have the kind of shopping center we had prior to year 2000? I have been hearing that the former Albertson's store (also formerly Stod's batting cages) will soon become an international market. Will this be the "anchor" store we have all been missing? The kind of products this store will have on the shelves most likely will not be like Safeway or QFC. If it succeeds here, it will confirm and support a cultural shift that is already taking place in Newport Hills. The values of this cultural shift are just beginning to emerge. Will these newer residents have a different set of values for the area we now call Newport Hills? And how will their needs influence what happens on the shopping center property? But, for whoever lives here, having more businesses here, especially "anchor" tenants like a QFC type grocery store and/or a drugstore is very unlikely to happen without more local residents to support those businesses. We have already found this out with a succession of failed grocery stores, the exodus of (2) banks, the drugstore, a liquor store and a gas station. Does anybody really believe that this will change without more residents living on the hill to support them? In year 2000 at one of the Newport Hills Community Club meetings, by a raising of hands, people at the meeting were asked if they shopped at Costco and Trader Joes. Just about everybody's hand went up. We tried getting Trader Joe's to come here. They said no. And unless Costco begins to operate smaller stores we will never see a Costco in Newport Hills. Clearly our food choices have evolved since the 60's and 70's and there is a greater mix of cultures and ages now, all requiring differing kinds of foods. The success or failure of the proposed international food store will tell us a lot about the future needs of residents here with respect to the shopping center redevelopment.

I-67

COMMENT

RESPONSE

I-67-5 Comment noted.

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

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

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

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

I-67-5

I-67

COMMENT

RESPONSE

I-67-6

See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for a description of the general character of future development studied this site under each of the alternatives in the EIS.

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

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

I-67-6

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

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

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

I-67

COMMENT

RESPONSE

I-67-7 Comment noted.

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

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

I-67-7

I-67

COMMENT

RESPONSE

I-67-8 See Common Response 19 Zoning Details.

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

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

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

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

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

I-67-8

I-67

COMMENT

RESPONSE

I-67-9 Comment noted.

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

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

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

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

Sincerely,

Steve Kunkel Newport Hill Resident since 1984

I-68

COMMENT

RESPONSE

I-68-1 | In 2008, I had been living, working, shopping, receiving healthcare, and attending church in Bellevue for several years. I finally had the emotional ability to escape an abusive relationship and found NO HELP with trying to keep the structure of my life and support network together for myself and my 1-year-old child. I have spent the past 15 years bouncing around living in various parts of the rest of the county as I have never been able to return to living in Bellevue. Being forced out of Bellevue, my child and I lost the structure of our life and support network and had to change every facet of our life multiple times because Bellevue was no longer accessible to me. To me, it is irrelevant what style of housing is built (mixed use, low-rise, mid-rise, high-rise, 2/3/4-plex, etc.). What IS RELEVANT to me is that whatever housing is built for the future, significant percentages of new or existing housing needs to be made available to low-income residents (households with <30% , <50%, and <80% AMI).

I-68-1 | Comment noted. See Common Response 4 Housing Alternatives.

I-68-2 | See Common Response 4 Housing Alternatives.

I-69

COMMENT

RESPONSE

I-69-1 | Every person I know, including myself, is unhappy about making Bellevue more densely populated. I fled from L.A. for that very reason. Who is happy about our city becoming packed in like rats? The developers and people who stand to make money. After all, money talks. Why are you allowing Bellevue to be wrecked? I probably won't hear back from you. As for me, we may have to move to avoid this calamity.

I-69-1 | See Common Response 13 Growth Targets.

I-70

COMMENT

RESPONSE

I-70-1 | As Bellevue gets more dense and the Seattle area implements on zoning requirements get adjusted (to allow for more affordable housing and a bigger density) I am very worried about protecting the existing trees. The tree canopy is very important, it is beautiful and it is one of the unique things about Bellevue. We need to protect trees inside private property (size restrictions). Otherwise developers will maximize the land and chop down everything. Thanks

I-70-1 | Please see Common Response 2 Tree Canopy.

I-71

COMMENT

RESPONSE

I-71-1

We wanted to remind the city of your promise to line 4 city tennis courts for pickleball and provide rollable nets this summer. When was this project scheduled to take place? I hope we can have more places to play since the Airfield park project hasn't started. We have more than 100 people coming out to play at International school every evening and need more courts urgently. Thank you!

I-71-1

Comment noted. This is outside the scope of the EIS.

I-72

COMMENT

RESPONSE

I-72-1

I heard in the past it was a goal of the city of Bellevue, to have more people who work in the city live in the city. What about those of us who already live in the downtown core? I live in Bellevue Towers and have been there for four years. During that time especially since the return to work of downtown workers the traffic on the surface streets is building rapidly. It may not seem like there are that many cars moving on the streets, but what about those of us who are trying to get onto the streets out of our buildings? At rush-hour it can be near impossible. There is construction all around us. What is being planned to increase street capacity? Thank you.

I-72-1

See Common Response 1 Non-Project EIS vs. Project Level SEPA Review. This Comprehensive Plan Periodic Update provides a programmatic approach to addressing the mobility needs of people who do now, and who will in the future intend to travel within and through Downtown Bellevue. The multimodal approach envisioned in the Mobility Implementation Plan and described as mitigation opportunities in this DEIS seeks to provide mobility options that address safety and equity, support growth and provide access. This approach will improve sidewalks, bicycle facilities, access to transit and vehicle operations.

I-73

COMMENT

RESPONSE

I-73-1 | 1) It looks like the east side of Bellevue is treated as the unimportant 'stepchild' of the city---why are the travel goals left unmet by all the alternatives when considering travel between Eastgate, Crossroads, and the Overlake area? Residents on the east and south sides of the city deserve safe and effective transportation just as much as the rest of the city does.
 I-73-2 | 2) The lack of further development of safe bicycle lanes is disappointing. If you have traveled by bike around the city (NOT just on designated 'bicycle corridors' but from residential areas to commercial areas) you find that bikes are combined with car traffic in many areas, which is not safe from the biker's perspective. I urge you to reconsider and to do more to make biking safe/safer in this city---if it feels safe to bike, many could be encouraged to use a bike instead of a car to make commuting and shopping trips.....but as it is, risking one's life by being forced in with speeding traffic is a barrier.
 3) SE 150th does NOT have sidewalks on both sides of the street, as your diagrams indicate. Many parts of that road have NO sidewalks at all; providing sidewalks would be a great way to encourage walking without forcing pedestrians to face the risk of walking next to vehicle traffic.

I-73-1 | The EIS documents the potential impacts of actions the city could take in updating the Comprehensive Plan and identifies measures that can be taken to minimize those impacts. The city may or may not take the actions identified and analyzed in the EIS and may or may not implement mitigation measures to meet the city's goals. However, the EIS will inform the city's update to the Comprehensive Plan, and the city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. The Mobility Implementation Plan calls for a complete and connected transportation network for all modes throughout the city. See FEIS Chapter 11 Transportation.

I-73-2 | The EIS assumed the same transportation network in all alternatives. Mitigation measures include expanding bicycle facilities consistent with the Mobility Implementation Plan. See FEIS Chapter 11, Transportation for more information about the proposed mitigation measures. 3) Along 150th Avenue SE, there are sidewalks on both sides in some segments, and only on one side (between Newport Way and SE 38th Street). In this segment, steep slopes and lack of public right-of-way create a challenge to building sidewalks on both sides.

I-74

COMMENT

RESPONSE

I-74-1 | After attending numerous meetings and reading the materials connected with the proposals, as well as looking at the downtown areas of Redmond and Kirkland, it is my opinion that Bellevue should implement a slow to moderate approach to growth and development. I feel that the growth proposed in the first alternative proposal provides significant increase in both housing and jobs. Yet there is less chance of over-building and irrevocably ruining the environment along the way with this plan.

I-74-1 | Comment noted.

I-75

COMMENT

RESPONSE

I-75-1 | Ban ICE powered lawnmowers and leaf blowers.

I-75-1 | Comment noted. This is outside the scope of the EIS.

I-76

COMMENT

RESPONSE

I-76-1

Bicycles. We need to think about what makes sense. First, the idea that bicycles are going to reduce traffic congestion or provide a sustainable "low carbon" alternative is not feasible. The number of people who will choose to commute by bike is minimal and will make no difference. In fact, bicycles contribute to traffic congestion when they ride on roads intended for cars. Bicycles are primarily for RECREATION, and the plan should be focused on that. Separate bicycle paths should be provided for safety, and in fact, bicycles should be DISCOURAGED from riding on roads with cars. You would not expect people to do Zumba in the middle of a highway, so why do we allow recreational riders to disrupt our traffic? I am a recreational biker, and really appreciate our local trails and how interconnected they are, but I avoid riding on roads at all costs, it is just too dangerous.

I-76-1

The EIS assumed the same transportation network in all alternatives. Mitigation measures include expanding bicycle facilities consistent with the Mobility Implementation Plan. See FEIS Chapter 11, Transportation for more information about the proposed mitigation measures.

I-77

COMMENT

RESPONSE

I-77-1

Environmentally, we need to keep our city in its current condition, i.e., well maintained parks, roads, excellent planning etc. We cannot let any public land be used for tenting or "squatting."

I-77-1

Comment noted.

I-77-2

Police must be fully funded so they can respond to the calls we place to them; I have had one experience where the police seemed to fault me for being concerned about an excavation project going on at 3 AM.

I-77-2

See DEIS Chapter 10, *Public Services and Utilities*, for a discussion of impacts to police services. As discussed on page 10-22, growth under all of the alternatives could potentially increase calls for police, thus challenging staff to meet response time targets. As discussed on page 10-29, the city would address changes in levels of service for police through the capital facilities planning process. Planned growth in the city would be incremental, and the planning process to relevant plans would address improvements required to maintain response times. As concluded on page 10-30, no significant unavoidable adverse impacts on public services, including police, would occur under each alternative.

We need full responses to any burglaries, theft from stores or any unlawful actions. We will not stand by and let the type of behavior that is currently going on in Seattle to go here in our city. Seattle has become the Bain of the conversations I've had with friends from around the country.

I-78

COMMENT

RESPONSE

I-78-1

I would like to see the term " climate change" be replaced with "stop pollution". Green house gases are pollution. So is city/road trash, graffiti, noise pollution and in general garbage in our city including carbon dioxide from cars.

I-78-1

Comment noted.

"Stop pollution " I believe is a more effective because everyone dislikes pollution while "climate change" is to political.

I-79

COMMENT

RESPONSE

I just wanted to submit a brief comment.
 I have participated in multiple interviews regarding this, and I am very glad to see that my suggestions have been all incorporated.
 I have read parts of this huge document, focusing on Alternatives 2 and 3. Alternative 0 is absolutely not acceptable to me and my family for the lack of affordable housing and a lopsided focus on just a handful of small parts of our wonderful city.
 Alternative 3 is also not acceptable as it seems to me to be too much too fast of a change. I don't think any city of our size can manage such a huge influx of new housing and new jobs well.
 Alternative 2 is my TOP CHOICE due to a larger number of housing units compared to Alternative 1 , but Alternative 1 is also attractive. My top concerns were increasing housing, which must include affordable housing, and both of these Alternatives address this.
 I think because our city is so vibrant and quite wealthy and industrious, letting it grow by providing more housing and more jobs would make Bellevue an even better place to live.
 Thank you
 Svetlana Verthein

I-79-1 Comment noted.

I-79-1

I-80

COMMENT

RESPONSE

I-80-1 | Unable to comment without documents/information to review.

I-80-1 The city issued a notice of availability and request for comments on the DEIS in accordance with SEPA. The extended 45-day public comment period was from April 27, 2023, to June 12, 2023. The DEIS, supporting documents, and city staff contacts were provided in the notice and available on the project webpage: <https://bellevuewa.gov/2044-environmental-review>.

I-81

COMMENT

RESPONSE

I-81-1	I am writing to provide my perspective on Bellevue Draft environmental impact statement. I appreciate the opportunity to participate in the and use planning and share my thoughts about the future growth and development of our city.	I-81-1	Comment noted.
I-81-2	I commend the comprehensive analysis conducted by DEIS, which takes into account all the various factors the in the end influence growth. The evaluation of natural, and built environments demonstrates the commitment the citizen's help will help us shape our future. However, some concerns have risen. To ensure proper use make sure the use of land use shift policy aligns with the principles of social equity.	I-81-2	See Common Response 14 Equity and Environmental Sustainability Metrics.
I-81-3	Also, I like to encourage the company to mitigate the potential environmental impacts that could occur if not taken care of, as well as incorporate sustainable practices.	I-81-3	See Common Response 14 Equity and Environmental Sustainability Metrics.
I-81-4	I appreciate the opportunity to contribute my thoughts and concerns regarding Bellevues Draft Environmental Impact Statement. I trust that this comment will be taken care of and under consideration just as every other	I-81-4	Comment noted.

I-82

COMMENT

RESPONSE

I-82-1	I like option 0, because it's growth with the ability to create infrastructure, utilities etc. without taxing the capacity for controlled growth. As an example, it seems that the roadare behind the curve in maintenance now. I can only imagine what greater growth would do.	I-82-1	Comment noted.
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I-83

COMMENT

RESPONSE

I-83-1	While I believe this statement is well written, makes sense for the rapid growth of our state and cities, I do not think it wise. Bellevue has already brown at a rapid capacity in just the past twenty years and each condo, corporate building, and park built cause an irreversible amount of damage. Yes, there may be an DEIS statement included in the potential growth of Bellevue which would make life "better" for citizens but no for the surrounding ecosystems despite that being what it's for. I don't even believe it's better for citizens. There's a list of issues and complications it would cause for people who are already members of Bellevue so I personally believe the growth is not needed.	I-83-1	See Common Response 13 Growth Targets.
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I-84

COMMENT

RESPONSE

I-84-2	Part of what makes Bellevue nice is the high bar to entry. We have a safe and secure city. Densification is good. It increases property tax income which allows the city to do more with the budget. Densification with the intent of making Bellevue more affordable may not have the same results. Low income housing does not generate income for the city. I don't think the families that currently live in Bellevue and enjoy the public parks and walks are really excited about having drug addicts and homeless people in their neighborhood.	I-84-2	Comment noted.
I-84-3		I-84-3	Comment noted.
I-84-1		I-84-1	Comment noted.
I-84-4		I-84-4	Comment noted.

I-85

COMMENT

RESPONSE

I-85-1	Zoning in the past has put commercial too far from residential. Commercial zoning should require that all commercial (except gas stations) should have second floors which should have one bedroom and studio and even dormitory style apartments on the second and third stories. No residential zoning should be more than 20 minutes from commercial and /or light industrial zoning. All commercial zoning should have wide sidewalks. Commercial zoning has too narrow sidewalks in many places, like 156 . Restaurants should be encouraged to have seating on the sidewalks. Also sidewalks should be wider anyway. Again sidewalks around crossroads is an example of too narrow sidewalks. All commercial roads should have bike paths. Bike paths and wide sidewalks need commercial zoning would encourage people to walk or bike. This would allow people to leave their cars at home. This would allow for less parking which means less asphalt and less gasoline fumes.	I-85-1	Much of the additional residential capacity studied in the EIS is in mixed use areas. The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan.
I-85-2		I-85-2	The EIS assumed the same transportation network in all alternatives. Mitigation measures include expanding bicycle facilities consistent with the Mobility Implementation Plan. See FEIS Chapter 11, Transportation for more information about the proposed mitigation measures.

I-86

COMMENT

RESPONSE

I-86-1 | I think that the implementation and planning of new safe bike lanes and accessibility for nearby amenities could have its own larger section because it could be more clear.

I-86-1 The EIS documents potential impacts of actions by the City and identifies measures to minimize those impacts. The City may implement some, all, or none of the mitigation measures; may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations; and it may also take measures not identified in the EIS. The Bellevue Mobility Implementation Plan and the Bike Bellevue project describe the complete and connected bicycle network with a focus on Primary Bicycle Corridors in the Urban Core Downtown, BelRed, Wilburton).

I-87

COMMENT

RESPONSE

I-87-1 | Make Bellevue a beautiful and safe place to live and we support the plans !

I-87-1 Comment noted.

I-88

COMMENT

RESPONSE

I-88-1 | For my comment I would like to focus on a section of Chapter 2: Alternatives, in which I think there could be slightly more clarification on one subject. This chapter starts by briefly describing each alternative, and then later on going more in detail on them. When I first started reading the brief explanation of Alternative 0 (No Action), I was a bit confused about what this alternative meant. It started by listing the positive outcomes of this alternative but no explanation on how we would get there. When I eventually scrolled down to page 11 of chapter 2, I found the more detailed description of Alternative 0 and began reading. Here it explains that this alternative would continue the current Comprehensive Plan last updated in 2015. In this section there are many tables, figures, and data explaining the trajectory of Alternative 0, but it still leaves me with one question. What does Alternative 0 have that the other alternatives don't? And therefore why include this information if it is already accessible in the current Comprehensive Plan from 2015? Scanning through the information it seems there is certainly benefits but not equal to or more than the other alternatives, therefore I am wondering if I am missing something here. This section could use some more clarification.

I-88-1 | The inclusion of a 'no action' alternative is required under SEPA. The “no action” alternative is required because it provides a baseline against which the environmental impacts of the proposed action can be compared. Alternatives 1 through 3 provide land use designations and policies that would result in a future increase in housing and jobs that is above and beyond what would occur if the land use designations and policies from the current comprehensive plan were to remain in place.

I-89

COMMENT

RESPONSE

I-89-1 | One of the first things I noticed while Bellevue's Draft Environmental Impact Statement was that several copies of the document were in different languages. I find this very important because not all people can read English. After reading the whole statement, I feel and believe that this plan is one that takes into account all social and economic factors to support and grow a stance of equity.

I-89-2 |

I-89-1 | Comment noted.

I-89-2 | Comment noted.

I-90

COMMENT

RESPONSE

I-90-1 | Very interesting read! Hopefully within these few years, this plan can successfully ensure that something can be done about the housing and in some cases, employment crisis so that our schools and neighborhoods will no longer experience significant decrease in children and families in general who can enjoy the resources our city offers!

I-90-1 | See Common Response 4 Housing Alternatives.

I-91

COMMENT

RESPONSE

I-91-1 | Firstly, I commend the thoroughness of the DEIS in considering the natural, human, and built environment, including the campus. The comprehensive evaluation of these factors is crucial for informed decision-making and responsible planning for the future. I appreciate the efforts made to assess the potential impacts and identify mitigation measures to address environmental concerns. Additionally, I would like to emphasize the importance of considering social equity throughout the planning process. As Bellevue experiences growth and development, it is crucial to ensure that the benefits and burdens of this growth are distributed equitably among all residents. The DEIS should include a detailed analysis of potential social and economic impacts, particularly on disadvantaged communities, to guide policies that promote inclusivity, affordability, and accessibility. In conclusion, I commend the City of Bellevue for undertaking the Comprehensive Plan process and the preparation of the Draft Environmental Impact Statement. I appreciate the opportunity to provide my comments and suggestions. I trust that the city will carefully consider these inputs as it moves forward in finalizing the plan and implementing the proposed land use policy shift.

I-91-2 |

I-91-1 | Comment noted.

I-91-2 | See Common Response 14 Equity and Environmental Sustainability Metrics.

I-92

COMMENT

RESPONSE

Overall, the Bellevue Comprehensive Plan is a very ambitious framework intended to direct the city's expansion over the next 20 years. The plan is trying to cultivate a dynamic, inviting, and habitable community while at the same time, preserving an excellent quality of life for its residents.

The plan puts forth several different approaches to accommodate growth, with each trying to strike a balance between housing and job growth, housing variety, and infrastructure investments throughout the city and the Wilburton study area. The Draft Environmental Impact Statement (EIS) takes a closer look at the impact of the different approaches, which I describe below:

These options include (I have relabelled Alternative 0 to 3 as Option 1 to 4):

- I-92-1 | 1. Not taking any action - This approach maintains the current growth structure, concentrating expansion within Downtown and BelRed without any modifications. Per the EIS, "this will likely have a significant adverse impact on housing affordability", which isn't good for diversity and inclusion in Bellevue. There will also be "significant and unavoidable adverse impacts" when it comes to traffic. This is difficult to imagine, given how bad traffic can be in Bellevue during rush hour. This seems to be the worst of the options compared to others.
- I-92-2 | 2. Catering to diverse families - This approach focuses growth in Mixed Use Centers and incorporates subtle density citywide, providing a range of housing options for families of all kinds. One of the main problems with this approach is the "potentially significant unavoidable adverse impacts on air quality", in addition to contributing to worsening traffic corridors, similar to Option 1.
- I-92-3 | 3. Expanding opportunities for more residents - This approach focuses on on growth in both Mixed Use Centers and Neighborhood Centers, as well as areas with convenient access to transit and employment, thus creating more residential possibilities. This approach also has "potentially significant unavoidable adverse impacts on air quality", similar to Option 2. Traffic issues also apply here, per the EIS as well.
- I-92-4 | 4. Offering choices across the city - This approach recommends growth in high-opportunity areas, including Mixed Use Centers and near Neighborhood Centers, ensuring housing options are available throughout the city. This approach also has "potentially significant unavoidable adverse impacts on air

- I-92-1 | Comment noted.
- I-92-2 | The commenter is correct regarding the DEIS conclusions for air quality and transportation. The purpose of the EIS is to disclose potential impacts, identify feasible measures that could be employed to avoid or minimize those impacts, and determine whether any unavoidable impacts would be significant. DEIS Chapter 8, *Air Quality*, Section 8.4 describes the construction and long-term mitigation measures for air quality impacts. As noted on page 8-20 and 8-21, the City of Bellevue is actively working to address air quality issues in the city, and potential mitigation strategies to address air quality impacts associated with locating development in close proximity to high-volume roadways. A suite of mitigation measures, which would be applicable to any of the Action Alternatives are listed on pages 8-21 and 8-22, to reduce exposure to air pollutants. FEIS Chapter 11, *Transportation*, Section 11.6, describes avoidance, minimization, and mitigation measures for traffic. The mitigation measures and strategies identified in the FEIS are programmatic in nature. As development occurs, the City will determine the capital and programmatic improvements best suited to address specific transportation conditions.
- I-92-3 | Please refer to response to Comment 1-92-2 regarding air quality and transportation impacts.
- I-92-4 | See Common Response 4 Housing Alternatives.

I-92

COMMENT

RESPONSE

quality", similar to Option 2 and 3, as well as traffic issues becoming worse, like the other three options.

As one can see, each of these different options present different ways to provide more housing units, employment, and commercial development. For example, Option 4 allows for the greatest increase in housing units and job opportunities, while Option 2 results in the smallest growth compared to Option 1.

I-92-5 | In conclusion, the Bellevue Comprehensive Plan represents a considerate and all-encompassing strategy for managing the city's growth. The EIS for it is very telling in the impact it can have on Bellevue residents. From (sometimes) not enabling low-income residents to remain or population growth in areas with high exposure to contaminated sites (like gas stations) and proximity to traffic, there is much to consider about what the future of Bellevue should be, and how it would look.

I-92-5

See Common Response 4 Housing Alternatives.

I-93

COMMENT

RESPONSE

I-93-1 | A halt on building until the infrastructure can be built to support it! The quality of life continues to deteriorate due to traffic in this city!

I-93-1

Comment noted.

I-94

COMMENT

RESPONSE

I-94-1 | Protect R-1 zoning. We have paid taxes for that for years with the understanding that that's zoning would be protected.

I-94-1 See Common Response 4 Housing Alternatives. All of the Action Alternatives allow duplexes, triplexes, cottage housing, or other low-density typologies in these areas, consistent with state law. This could result in localized land use compatibility impacts where newer development is of greater height and intensity than existing development. These compatibility impacts, while more likely under the Action Alternatives, would be minimal and can be mitigated through city application of underlying zoning and development regulations throughout Land Use Districts within the city. In addition, the city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 19 Zoning Details.

I-95

COMMENT

RESPONSE

I-95-2 | More bike lanes. Speed up light rail. Increase speed limit to 30mph on 156th
 I-95-3 | and 164th through Lake Hills. Keep the Meadow and other green spaces green
 I-95-4 | and pristine. There is enough mega housing already. Apartment housing is
 I-95-1 | needed more than more giant homes. My adult kids live with us b/c they cannot
 I-95-4 | afford to rent an apartment near here. Balance the housing cost spectrum to
 I-95-4 | include middle class folks.

I-95-1 The EIS assumed the same transportation network in all alternatives. Mitigation measures include expanding bicycle facilities consistent with the Mobility Implementation Plan. See FEIS Chapter 11, Transportation for more information about the proposed mitigation measures.

I-95-2 Comment noted.

I-95-3 See Common Response 7 Parks and Open Space.

I-95-4 See Common Response 4 Housing Alternatives.

I-96

COMMENT

RESPONSE

I-96-1 | I have two comments area's: Bicycles and housing density. 1) The city needs to either make a commitment to bicycles as an alternative or stop trying. The existing system is more dangerous than having nothing. Depending on the route, you have to move in and out of bicycle lanes a half a dozen times. each time having to merge with traffic. If you cannot do it right, don't do it at all. Look at Amsterdam, they made a commitment to bicycles and are doing the planning, changing rules, and building the infrastructure to accomplish the transition to no cars in the CBD. 2) One simple change to our building code would ease our housing problem: allow a small housing unit to be built on a lot with an existing house: an "Ohana". In addition to helping the housing problems, it would have some very positive social benefits.

I-96-2 |

I-96-1 | The Mobility Implementation Plan and the Bike Bellevue program describe the complete and connected bike network throughout the city with a focus on Primary Bicycle Corridors and the urban core areas of Downtown, BelRed and Wilburton. Progress is incremental.

I-96-2 | See Common Response 4 Housing Alternatives.

I-97

COMMENT

RESPONSE

I-97-3 | I believe Bellevue has the residents and businesses best interests in mind when planning the next phase for the city with adherence towards the warm, safe city I have come to know over the 52 years I have lived here. I understand the importance of affordable and safe housing for those that need to get a foothold on life, career and family. I believe the large multi- use areas are needed, but there should be limits on the density for allowing this development. Green space is vital, the downtown park is a great example of this. I am confident that the leadership guiding this plan has our safety and the youth of our community in mind when zoning such changes. The older established neighborhoods only serve to create an attractive and "home town feel of this growing, vibrant, and proud community. Please keep in mind the reason Bellevue has become and is such a great community. Thank you, Ken

I-97-4 |

I-97-1 |

I-97-2 |

I-97-1 | See Common Response 7 Parks and Open Space.

I-97-2 | See DEIS Chapter 6, *Aesthetics*. This section summarizes the impacts on the built form. See the mitigation measures summarized in Table 1-2 in DEIS Chapter 1, *Summary*. These are actions the city can take to reduce or eliminate the impacts of growth.

I-97-3 | See Common Response 4 Housing Alternatives.

I-97-4 | See Common Response 4 Housing Alternatives.

I-98

COMMENT

RESPONSE

I-98-1

We hope you will allow high density construction on the several large open space plots located along 140th near the Bellevue Golf Course. This is a perfect place to have high density housing along a busy corridor. The area is close enough into the city and yet, surrounded by plenty of beautiful public open space. This area should not be exclusively for those that can afford the traditional mansions in that area/Bridle Trails. There are some larger pieces in this area ripe for development. Please do not miss this incredible opportunity to change the trajectory of that area allowing it to be more accessible with more affordable, higher density housing types and allowing people of wider economic backgrounds to also enjoy its public natural spaces directly from their homes. It can be done - Thank you

I-98-1

As described on page 2-9 of DEIS Chapter 2, *Alternatives*, the development capacity is based on assumptions about how much land is redevelopable and the type of projects that could be developed under existing zoning. Therefore, the Comprehensive Plan Periodic Update and the DEIS analyze changing the SF-L land use category along 140th near the Bellevue Golf Course to Residential-Large Lot (R-LL) under Action Alternatives 1 and 2, and to Residential-Suburban (R-Suburban) under Action Alternative 3 (see DEIS Appendix B).

The FEIS studied a combination of R-Low and R-LL in this area, with the additional application of the provisions in HB 1110, allowing more units per lot. The R-LL land use category would allow for mostly single-family homes on large lots with some duplexes and cottage housing types mixed in. The R-Suburban land use category would allow for a mix of single-family, duplexes, triplexes, and cottage housing. The R-Low land use category allows for a mix of apartment buildings with townhomes and single family homes. More generally, the city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 4 Housing Alternatives for more information about the inclusion of new state legislation in the analysis of housing options.

I-99

COMMENT

RESPONSE

I-99-1

The larger plots of land along 140th near the Bellevue Golf Course are ready for apartments! This makes so much sense for Bellevue and all the types of people that live there.

I-99-1

Comment noted.

I-100		COMMENT	RESPONSE
I-100-1	<p>The zoning update near Wilburton is exciting. However, if all that will be built are "luxury apartments," then it's fundamentally a waste of time. Bellevue doesn't need more "luxury apartments," it needs purchasable housing that people who don't work at Microsoft and Amazon can afford. So many businesses exist in the city to support the tech industry, from cleaning services to restaurants to office supply stores and more, not to mention teachers and educators, none of which make enough to live close to where they work.</p>	I-100-1	See Common Response 4 Housing Alternatives.
I-100-2		I-100-2	See Common Response 4 Housing Alternatives.
I-101		COMMENT	RESPONSE
I-101-1	<p>we need sidewalks from 52nd to 60th on 123th S E. Children walk to school,, many adults take long walks. We must walk in the street now.</p>	I-101-1	<p>The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan.</p>

I-102	COMMENT	RESPONSE
I-102-1	<p>With the rise of homelessness it is important for this city to manage this vulnerable population. I wish for all people to be treated with respect, but I also believe people should respect the environment around them. I see more trash and filth along certain corridors of our otherwise beautiful city. If the city of Bellevue has a plan to house these people along streets, parks and large parking spaces it must do much more to address the cleanliness of the areas around them. Seattle looks like a garbage can! My Grandmother grew up on the south side of Chicago and never had a lot of money, but one thing she stressed is that you don't need a lot of money to stay neat and clean. Spend a little more on these services if more people are allowed to live in homeless conditions. If people are too stoned to clean up them make them leave or house them inside somewhere. Crack down on hard drug pushers. Allow all books to be read , no banning books. Thank you for this open dialogue.</p>	<p>I-102-1 The topic of homelessness and solutions to address this issue are outside the scope of analysis for this EIS. However, it should be noted that each alternative would provide a range of housing types to meet the needs of households with varying levels of income and that each alternative provides mandatory and/or voluntary affordable housing requirements. See Common Response 4 Housing Alternatives.</p>
I-102-2	<p>little more on these services if more people are allowed to live in homeless conditions. If people are too stoned to clean up them make them leave or house them inside somewhere. Crack down on hard drug pushers. Allow all books to be read , no banning books. Thank you for this open dialogue.</p>	<p>I-102-2 Comment noted.</p>
I-103	COMMENT	RESPONSE
I-103-1	<p>Re Bicycling in Bellevue:</p> <p>Along the south side going up Bel-Red road, the remaining parts of the very old & very narrow sidewalk badly need replacement by a wider ones to match the lower areas so much newer and wider. Reason: for much greater SAFETY in such close proximity to cars speeding by!</p> <p>Drivers frequently stop in the middle of crosswalks, even blocking them entirely sometimes, furthermore even rudely refusing to back up even when there is space behind them to do so. So asap boldly stripe & install more cameras everywhere still lacking these SAFETY steps!</p> <p>Somebody pleeeze install means to LOWER BIKE RACKS ON METRO BUSSES, like the steps lowered for pedestrians. Then I could ride uphill to Crossroads or to Redmond or over to Factoria (because I cannot lift up my bicycle after 2 back surgeries plus now in my 80's. I need to have my bike with me to get to the Transit Ctr plus to ride for various errands at my destination, because I must walk with a cane & can do so only up to about 6 blocks. PLEASE SOLVE THIS MAJOR PROBLEM!!!</p>	<p>I-103-1 The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan. The other specific requests are outside of the scope of the EIS.</p>

I-104	COMMENT	RESPONSE
I-104-1	<p>I'm always disappointed when a new building in Bellevue, especially a highrise, is the same old square, glass structure that isolates a block. There are so many exciting architectural inventions happening in cities, mostly outside the US. Why shouldn't Bellevue be the US version of Barcelona, a city known internationally for its beauty and innovative architecture? Open courtyards that encourage social mixing, solar panels windows, low-carbon cement, and concrete that contains optic fibers are just a few of the many creations developers could take advantage of if we nudge them in the proper direction. Buildings should be viewed as works of art that will color downtown for decades. Be the city that stops profit from being the deciding design factor. Help Bellevue be bold.</p>	<p>I-104-1 Comment noted. This document is a non-project EIS that analyzes growth alternatives, environmental impacts associated with the alternatives, and potential mitigation for impacts broadly across the study area. When individual projects are proposed for development, the design of the proposed structure(s) will be evaluated for consistency with the city's codes, standards, and regulations as part of the project-level environmental review process.</p>
I-105	COMMENT	RESPONSE
I-105-1	<p>Please save our wonderful & beautiful neighborhoods. No condos, apartments or high-rises.</p>	<p>I-105-1 Comment noted.</p>
I-106	COMMENT	RESPONSE
I-106-1	<p>We have a wonderful police department. Keep it so. Tough on crime, gangs, drugs, etc. Absolutely no catch & release. Do not make us another slum ridden. Crime filled Seattle. Thank you.</p>	<p>I-106-1 Comment noted.</p>

		COMMENT	RESPONSE
I-107	I-107-1	<p>Re Mitigation measures under the No Action Alternative Aesthetics category, the word "could" is used to describe potential building restrictions, while Alternative 1 uses the word "would" when explaining "gentle density increases." Why not say explicitly that there will be building restrictions? Is there or is there not an intent to enact some restrictions? The items listed under the mitigation measures should all be enacted, but also please add lighting restrictions.</p>	<p>I-107-1 This document is a non-project EIS that analyzes the growth alternatives and the environmental impacts associated with the alternatives broadly across the study area. The mitigation measures listed in DEIS Chapter 6, <i>Aesthetics</i>, pages 6-62 and 6-63 represent options the city can take to reduce impacts of future growth under each alternative with respect to aesthetics. Any one of the measures listed and/or a combination of them would result in a less than significant impact with respect to aesthetics, and the city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations. A decision to require the implementation a specific mitigation measures, including the use building restrictions, to address potential aesthetics impacts will be made at future date and will be informed by the environmental analysis in the EIS. Consideration of lighting restrictions would be based on city codes, standards and regulations and could be a topic that the city considers in connection with amendments to those codes, standards, and regulations or on a project-by-project basis when the city is regulating specific development proposals subject to those city standards and regulations.</p>
I-108	I-108-1	<p>Please protect our environment. Remember that trees should become old growth, and old growth protects us from fires and provides our fresh air. Wildlife need homes, too. We hurt ourselves when we don't have balance.</p>	I-108-1
	I-108-2	<p>I saw some trees that seemed to be chopped down for no reason on the side of 405 at Coal Creek. Why would be kill 30-40 year old trees when we could have preserved them? We should be doing everything we can to save trees.</p>	I-108-2
	I-108-3	<p>I support planned urban developments with fewer single family homes and more shared spaces. Lawns should be a thing of the past or people should be taxed to have them. We can't afford to live like it's the 1950s.</p>	I-108-3
		<p>What is personal freedom when there is nothing left to protect? Please put the environment first when planning. Thank you for your time and consideration.</p>	I-108-2 I-108-3

I-109

	COMMENT	RESPONSE
I-109-1	I want to keep Bellevue as a “city in a park.” I’m opposed to promoting higher density concepts like high rises, mixed housing like duplex, multiplex, etc. I also don’t want any more shelters here. Regarding transportation, more side walks on 108th AVE NE would be nice and more pedestrian friendly crosswalks. I don’t believe we need more transportation options. This adds to more congestion.	I-109-1 See Common Response 7 Parks and Open Spaces.
I-109-2		I-109-2 See Common Response 4 Housing Alternatives.
I-109-3		I-109-3 See Common Response 1 Non-Project EIS vs. Project Level SEPA Review. The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan. Most segments of 108th Avenue NE that do not currently have a sidewalk or striped area for pedestrians and bicycles are constrained by steep slopes that make construction of a traditional sidewalk very expensive. The city has installed striping, crossings and traffic calming in recent years to improve access and safety. Additional improvements could be considered in the future, with public input and support.
I-109-4		

I-110

	COMMENT	RESPONSE
I-110-1	Please, please complete the modernization of the key transportation route along Bellevue's eastside: West Lake Sammamish Parkway. This route along Lake Sammamish is heavily used by residents and yet only LIMITED sections of the parkway have been modernized from the decades old, pitted concrete surface that still exists with dangerous bicycle and pedestrian passage (no sidewalks) alongside the concrete road. This sad situation exists in Bellevue, while Redmond completely updated their section of West Lake Sammamish Parkway to accommodate cars, bicycles and pedestrians many years ago. Thank you. Sincerely, LeeAnn Stivers	I-110-1 West Lake Sammamish Parkway is being upgraded in segments as funds are available. Due to steep slopes and utility upgrades needed, transportation improvements in this location are expensive and require adequate funding prior to implementation and construction.

I-111

COMMENT

RESPONSE

I-111-1 | Doing nothing seems not a good option.
 Alternative 3 has gone way too far.
 Between Alternative 1 and Alternative 2, at the high level, the latter seems to make more sense, though the former is acceptable too.
 I-111-2 | One thing I don't see is the focus on safety - unfortunately this has become a big concern, both personal safety and property safety. The city's planning should take that into account, perhaps even the highest priority -- try to mitigate the issue at the planning stage.
 Thank you for listening.

I-111-1 | Comment noted.
 I-111-2 | See DEIS Chapter 10, *Public Services and Utilities*, for a discussion of the potential for growth under the alternatives to increase crime. As discussed on page 10-29, the city plans to account for the potential increase in crime through the capital facilities planning process to ensure that improvements are made to increase police response times.

I-112

COMMENT

RESPONSE

I-112-1 | Regarding: DEIS
 If you believe in GLOBAL WARMING, you will NOT allow a more populated Bellevue Washington! By building more housing, apartments, condominiums in single family neighborhoods, you will take out many, many trees which will affect the streams & wildlife that exists in Kelsey Creek & Bridal Trails and many other areas here. The environmental impact in the future will be detrimental to our city & the world. Why do you want to push GLOBAL WARMING????????? Do you want the destruction of the earth to come sooner by pushing this through? Please do not do this!

I-112-1 | See Common Response 12, Climate Change.
 I-112-2 | See Common Response 2 Tree Canopy. See Common Response 9 Plants and Animals.
 I-112-3 | See Common Response 12 Climate Change.

I-113	COMMENT	RESPONSE
	Thank you for allowing local public input on EIS.	I-113-1 Comment noted.
I-113-1 I-113-2	In my humble opinion, I am against increasing the density of housing in our area. We need to protect our dwindling natural open resources (parks, greenbelts, wetlands, rivers and streams).	I-113-2 See Common Response 2 Tree Canopy. See Common Response 9 Plants and Animals. See Common Response 16 Critical Areas.
	Currently with all the construction of new commercial high raisers there seems to be ample future housing.	I-113-3 See Common Response 12 Impacts of Climate Change.
I-113-3	If there is truly a push for 'Global Warming and Sustainability', increasing housing density in our area needs to be very carefully examined.	
	Keep Bellevue Green!!!	
	Sincerely,	
	Ching-Chao	

I-114	COMMENT	RESPONSE
	One of the articles in the Seattle Times noted the problem with delivery trucks. Please include in the zoning and planning methods for delivery that 1) don't block street parking 2) don't impinge on handicap spaces.	I-114-1 The city has adopted a Curb Management Plan which addresses active uses of the curb including deliveries.
I-114-1	I can't tell you how many times I go to park in a handicap spot and it is blocked by a truck making a delivery. Fewer than 11% of the buildings in Seattle have a loading dock . Perhaps they can be shared.	
	Drivers are in a hurry. On my residential street, they just park in the middle of the street, blocking driveways and drivers.	
	Please plan for these.	

I-115	COMMENT	RESPONSE
I-115-1	<p>I continue to see affordable housing for low & middle income to be a problem. I want to see Bellevue grow in diversity in multiple ways. Luxury condos we truly have enough of. Building by light rail stations will improve traffic congestion and develop personal habits/ life styles that are healthier for the total community. Bellevue needs to promote walking and pedestrian safety. More colorful signs could be seen as reminders for drivers. Tree growth and the protection of old growth in the community needs attention. Too many trees have been cut down without law protection/enforcement. Making Bellevue a 21 century model for transit options should be emphasized. I look forward to our future transit completions. Cleanliness of litter is something which I am concerned with as I walk all over, since I do not have a car. This problem has improved, but is definitely ongoing. The litter by bus stops can be bad at different sites. Psychologically, a clean city indicates a caring & functioning community! Thanks for this opportunity to give my views.</p>	I-115-1 See Common Response 4 Housing Alternatives.
I-115-2		I-115-2 All the action alternatives described in the DEIS propose new housing and employment opportunities near most light rail stations (except by the South Bellevue stop due to wetlands and steep slopes).
I-115-3		I-115-3 The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan.
I-115-4		I-115-4 See Common Response 2 Tree Canopy.
I-115-5		I-115-5 See FEIS Chapter 11, Transportation.
I-115-6		I-115-6 Comment noted.
I-116	COMMENT	RESPONSE
I-116-1	Plant or replant more large shade trees along the down town sidewalks.	I-116-1 See Common Response 2 Tree Canopy.
I-116-2	Continue installing mid block pedestrian crosswalks to make downtown walkable.	I-116-2 The Mobility Implementation Plan describes the vision of a complete and connected sidewalk network on city arterial streets. The prioritization of transportation projects, including sidewalks, is outlined in the Transportation Facilities Plan.
I-116-3	<p>Inner circulating downtown trolleys (Transit Center on 110th AVE NE to 4th to Bellevue Way to NE 10 to 110 back to Transit Center). This puts all downtown pedestrians within two blocks walking distant from all downtown buildings.</p>	I-116-3 See FEIS Chapter 11, <i>Transportation</i> .
I-116-4		I-116-4 Comment noted.
I-116-5	Senior center in downtown Bellevue	I-116-5 Comment noted.

I-117

	COMMENT	RESPONSE
I-117-1	<p>Hello, Thank you for all your work and thought for the future of Bellevue. I would like to vote for Option O- Do Nothing. Bellevue has recently experienced significant growth in housing options, not necessarily for all. While several units have recently appeared, most are very high-priced. New developments are likely to be similar.</p> <p>Also, this much development is impacting the natural. environmental aspects of our region. Please count my vote for 1)Do nothing as an avenue to stop destruction of the beauty of current region. PLEASE ALLOW THE CURRENT NATURAL BEAUTY OF OUR REGION TO THRIVE.</p>	I-117-1 Comment noted.
I-117-2		I-117-2 See Common Response 4 Housing Alternatives.
I-117-3		I-117-3 See Common Response 7 Parks and Open Space.

I-118	COMMENT	RESPONSE
<p>To: City of Bellevue Planning Commission From: April Stevens, Bellevue resident</p>	I-118-1	See Common Response 7 Parks and Open Space.
<p>First, let me thank you for all your time and efforts that you are giving to consider how Bellevue will grow in the next 20 years. It is a huge task and takes considerable evaluation to ensure that we meet all of our growth goals.</p>	I-118-2	See Common Response 8 Air Quality and GHG. See Common Response 15 Climate Change and State Planning Framework.
<p>I-118-1 In particular, I am writing to you to ensure that our environmental goals of 80% reduction in greenhouse gases by 2050 and increasing our tree canopy to 40% citywide. It is essential that growth be done in parallel with these goals and that the city is able to provide a summary stating this intention on whatever alternative you advise. Currently, this is not the case. Neither of these goals are sufficiently analyzed in the current EIS. Additionally, measures and accountabilities should be in place to monitor progress.</p>	I-118-3	See Common Response 2 Tree Canopy.
<p>I-118-2 Another important factor that is not addressed in the DEIS, is the importance of tree canopy. Tree canopy has several positive climate effects beyond that of capturing carbon. According to the US Department of Energy, sufficient tree canopy can reduce energy consumption. A US Forest Service study, trees can lower air temperature by up to 7 degrees Fahrenheit in urban areas. This will help achieve the City of Bellevue’s environmental stewardship plan.</p>	I-118-4	Comment noted.
<p>I-118-3 As long as these stated goals are addressed, I am in favor of alternative 3 as being the most environmentally friendly. This alternative broadly distributes density growth and allows for greater mixed use areas with both commercial and residential development particularly around transit areas making it easier to reduce car trips. It makes neighborhoods more walkable and allows for more types of lower cost housing options.</p>	I-118-5	See Common Response 7 Parks and Open Space.
<p>I-118-4 I encourage you to revert to what the founders of Bellevue had as their vision: a city within a park. Keeping this vision in mind as our city grew is what has made Bellevue a desirable place to live and work. Please don’t lose this focus!</p>		
<p>I-118-5 Thank you again for your work and for allowing me to share my views. Sincerely, April Stevens</p>		

I-119		COMMENT	RESPONSE
I-119-1	<p>I would like to ask the city to include plans to improve our infrastructure while they prepare to more than double the residents and commercial facilities. Traffic is already a nightmare and not everyone will utilize public transportation (and if they did, there would not be enough space). Please also do more to offset the environmental impact the capacity increase will create to ensure our air and water remain clean and healthy.</p> <p>Lastly, the document was 1,000+ pages and way too long for most residents to read. Moving forward, please include a one-page summary at the start of the document with facts about the proposed options. This will increase civil engagement and awareness and mitigate unhappy residents of the future.</p> <p>Thanks for your consideration and for putting the interests of Bellevue residents first.</p>	I-119-1	See DEIS Chapter 10, <i>Public Services and Utilities</i> , and FEIS Chapter 11, <i>Transportation</i> , for analysis of how growth under the alternative scenarios could impact infrastructure as well as potential mitigation for those identified impacts.
I-119-2		I-119-2	See Common Response 8 Air Quality/GHG. See Common Response 3 Water Quality.
I-119-3		I-119-3	See DEIS Chapter 1, <i>Summary</i> , Section 1.7, Summary of Key Findings, Impacts, and Potential Mitigation Measures. This section provides a high-level summary of the environmental evaluation of alternatives, mitigation measures, and overall findings in a tabular format. In addition, DEIS Chapter 1, Section 1.8, Significant Unavoidable Adverse Impacts, provides a succinct list of topic areas in which the alternatives would result in significant unavoidable adverse impacts. FEIS Chapter 1, <i>Introduction and Summary</i> , provides a table of the No Action and Preferred Alternatives impacts and potential measures.
I-120		COMMENT	RESPONSE
I-120-1	<p>Our original concern about the Wilburton plan was that there would be a radical height difference between our property and the property immediately to the west of our apartment buildings. However, after attending the recent EIS meeting at City Hall, we learned that there are potential plans to rezone our street as well. The new designations are R-medium and R-High, which are yet to be defined. Without a full definition of those changes, it is difficult to comment at this time. But we can say that we favor the incentive-based programs where implementation of lower-cost housing is concerned.</p>	I-120-1	See Common Response 19 Zoning Details.
I-120-2		I-120-2	See Common Response 4 Housing Alternatives.

I-121

COMMENT

RESPONSE

Comment on Draft Environmental Impact Statement/Bellevue 2044 Comprehensive Plan:

I-121-1 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space. See Common Response 8 Air Quality/GHG.

My priority in commenting on the DEIS is to implore you to consider
 1. the negative environmental impact on the city Tree Canopy that is diminishing because of weak tree code enforcement and protection and
 2. the need for clarification of quantitative analysis of this impact. I see nowhere in the any of the Alternatives that any detailed study will be included to preserve/protect/growth one of the most vital parts of any city in a growth stage.

I-121-2 See Common Response 4 Housing Alternatives. See Common Response 11, Impact of COVID-19. See Common Response 13 Growth Targets.

I-121-3 Comment noted.

I-121-6

It is apparent that the City has chosen to avoid the subject of the obvious benefits trees provide, especially in a DT core area and where higher density is proposed. No part of any of the Alternatives for housing and job growth are specifics for tree canopy growth or destruction of, included.

I-121-4 Please see Common Response 2 Tree Canopy.

After reading the Alternatives proposed, I could not endorse any of them without concrete numbers, data and an effort to present mitigating factors of losing more canopy for the sake of growth.

I-121-5 The use and disposal of hazardous waste is addressed by existing federal, state, and local regulations. Regarding water quality and flooding impacts, see Common Response 3, Water Quality.

I-121-1

Growth for growth's sake is not a good choice and I have the feeling that the city is bent on development of more citadels of cement. In this momentum for growth, the city is sacrificing air quality, building fewer parks with more trees not just open spaces, contributing to more traffic and finally as a result, producing less healthy communities.

I-121-6 See Common Response 2 Tree Canopy.

Why has the city been so keen on allowing developers/builders, residential and commercial, to build what they want, where they want?

I-121-2

It is so disappointing to see the results of so much unaffordable housing spiraling upward, taking away our sidewalk sunshine and creating vertical pillars in place of friendly neighborhood streets where people actually speak. Building housing density within existing single family neighborhoods is not the answer either. With the new paradigm of employees working from any place in the world, this overreach of building "affordable housing" won't need to be because there is already an over-abundance of empty real estate office space.

I-121-3

This 2044 Plan is way too aggressive and way too expensive. None of the Alternatives are necessary. But what is most worrisome is the omission of any tree canopy protection in any of the proposals.

I-121-4

Please consider revising this position. All communities deserve the benefits of what trees provide. Hazardous materials in concrete can cause health issues,

I-121-5

not to mention soil erosion, water pollution and flooding. Nothing was noted of these negative environmental factors in the DEIS that I read.

Thank you.
 Julie Beffa

I-122

	COMMENT	RESPONSE
I-122-1	I am very concerned about the impact of a denser residential population on environment and on neighborhood security.	I-122-1 See DEIS Chapter 10, <i>Public Services and Utilities</i> , for a discussion of the impacts of each alternative on police services.
I-122-2	I urge a more careful technical social reviews of such drastic changes in policy. I also think it is necessary to have more public hearings and a final voting by all residents.	I-122-2 See Common Response 19 Zoning Details.

I-123

	COMMENT	RESPONSE
I-123-1	Please preserve Bellevue as a "city in the park" by preserving open space and limiting dense development to areas near arterials and public transportation. A good example of what not to do is the parcel that is the subject of the Save Coal Creek movement. This undeveloped parcel is far from transportation and should be preserved as parkland. The idea of building 36 homes there is outrageous. The jobs/housing balance should be aligned to minimize the need for folks to commute into Bellevue for work. But this can be done by limiting jobs in Bellevue and not (only) by increasing housing density. Growth is not imperative. And yes, by all means increase pedestrian and bicycle transportation.	I-123-1 See Common Response 7 Parks and Open Space. See FEIS Chapter 11, Transportation.
I-123-2		I-123-2 As described in DEIS Chapter 2, Section 2.3.2, <i>Regulatory Framework</i> , the City of Bellevue's Comprehensive Plan Periodic Update must meet all of its responsibilities under the Growth Management Act and King County Countywide Planning Policies, which sets housing unit and job targets.
I-123-3		I-123-3 The Mobility Implementation Plan provides a vision for a complete and connected network for pedestrians and bicyclists. As resources are available, the network is being completed.

	COMMENT		RESPONSE
I-124			
	Dear City of Bellevue,	I-124-1	See Common Response 4 Housing Alternatives.
I-124-1	I am writing to express my sincere support for the implementation of higher density living solutions within our city. As the demand for housing continues to surge, it is crucial that we prioritize affordable options and ensure accessibility for the many workers at the Microsoft campus. By embracing higher density living, we have an opportunity to alleviate the pressing issue of skyrocketing housing costs while simultaneously providing proximity and convenience for those employed in one of the largest tech companies in the world.	I-124-2	See Common Response 4 Housing Alternatives.
		I-124-3	See Common Response 8 Air Quality/GHG. See FEIS Chapter 11, Transportation.
		I-124-4	Comment noted.
I-124-2	Bellevue has witnessed rapid growth in recent years, attracting a significant number of talented professionals seeking employment opportunities in the thriving tech industry. With Microsoft's expansive campus serving as a major employer in the area, it is essential that we develop innovative strategies to address the housing needs of the workforce.	I-124-5	See Common Response 4 Housing Alternatives.
I-124-5	Higher density living offers a practical solution by maximizing land use and promoting the construction of multi-story buildings and mixed-use developments. By embracing this approach, we can create more housing options within the existing urban fabric of Bellevue, reducing the strain on available land and promoting efficient land utilization.		
I-124-3	Moreover, higher density living encourages the development of vibrant, walkable neighborhoods that foster a sense of community and social interaction. By constructing housing in close proximity to workplaces, such as the Microsoft campus, we can reduce commute times, traffic congestion, and carbon emissions. This not only benefits the workers who will enjoy a shorter and more sustainable commute but also enhances the overall quality of life for all residents by creating a more sustainable and inclusive city.		
I-124-4	In conclusion, I strongly urge the City of Bellevue to embrace the concept of higher density living as a viable solution to the pressing need for affordable housing and accessibility for the workers at the Microsoft campus. By adopting this approach, we can foster a more sustainable, affordable, and socially vibrant city that meets the needs of both current and future residents.		
	Thank you for your time and consideration.		
	Sincerely, Virginia		

I-125

COMMENT

RESPONSE

I-125-1 Please see Common Response 7 Parks and Open Space.

I-125-1



I-126

COMMENT

RESPONSE

June 9, 2023

Bellevue 2024-2044 Comp Plan Periodic Update & Wilburton Vision Implementation DEIS -PRIORITY COMMENTS-

Dear City of Bellevue,

Thank you for all the effort you have expended to reach this point of the draft EIS (“DEIS”). I share this comment letter in an effort to help refine the DEIS further and to shed light on areas requiring additional study. This is all with the intent of having a Final EIS (“FEIS”) that is broad enough in its scope so that the forthcoming discussions on the Comp Plan policy revisions are well supported, whatever direction they may take.

I have been working closely with the City over the past two years to provide input on the Comp Plan update, and to shed light on much needed changes to the Comp Plan and subsequent zoning, to ensure that the growth contemplated is actually achievable. Most of my input has been focused through the lens of the Evergreen Center site, which is a 6-acre property just north of the 130th light rail station, located between 130th and 132nd. This sits in the heart of Bel-Red and has incredible potential to be a catalyst for the neighborhood, but under current zoning redevelopment is entirely infeasible. My hope is that through the FEIS and Comp Plan, the ultimate zoning changes will enable feasible redevelopment to occur.

The main areas of the DEIS requiring further study are: **1) flexibility in allowed used in Bel-Red and across the City; 2) the impact of current Critical Area standards on density; and 3) the impacts to density of the current proposed street grid, especially in Bel-Red.** Details on all of these, and other topics, follow:

1) General Comments

- a) The FEIS should provide a breakdown of the FAR assumptions that were made on specific sites throughout the City.
- b) The FEIS should indicate which assumptions were used for specific sites by use, e.g. how much housing vs. commercial vs. retail, etc. is assumed?
- c) Study consolidating the amount and type of zoning designations, specifically the Bel-Red zones should be combined into more general, use-agnostic zones, such as a broader Bel-Red Mixed-Use zone that would apply across the majority of Bel-Red.
- d) Study increased amounts of commercial and jobs on parcels throughout Bel-Red, specifically on the Evergreen Center property.
- e) Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and engender an 18-hour neighborhood.
- f) Study allowing sites to apply for site-specific rezones without needing a Comp Plan amendment
- g) Study the impacts to development density of various development standards, including floor plate sizes, upper-level setbacks, building tower spacing, site impervious area requirements, on-site playground requirements, etc.
- h) Study the potential increase in housing density by eliminating all floor plate size limits for residential projects below 85 feet in height (not including mechanical/elevator penthouses).

I-126-1

I-126-2

I-126-3

I-126-4

I-126-5

I-126-6

I-126-7

I-126-8

I-126-9

I-126-1 See Common Response 19 Zoning Details.

I-126-2 See Common Response 19 Zoning Details.

I-126-3 See Common Response 19 Zoning Details.

I-126-4 See Common Response 19 Zoning Details.

I-126-5 The EIS studied a variety of future land use designations in the BelRed subarea, and this property was included within the study area for the Action Alternatives and the Preferred Alternative. The details can be found in DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.

I-126-6 The identification of catalyst projects is outside of the scope of the EIS. However, a variety of uses were studied on the sites around light rail stations, particularly in BelRed.

I-126-7 Rezones are required to align with the Comprehensive Plan map and policies. Some of the future land use categories in the EIS are different from the existing future land use categories. However, any proposed rezone within the city walls still need to comply with the regulations and decision criteria in the Land Use Code. See Common Response 19 Zoning Details.

I-126-8 See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the proposed growth alternatives, potential environmental impacts associated with those alternatives, and potential mitigation for those identified impacts across the study area. An evaluation of specific development proposals will take place on a case-by-case basis when individual projects are proposed and undergo project-level environmental review under SEPA. However, the city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations.

I-126-9 See Common Response 19 Zoning Details.

I-126

COMMENT

RESPONSE

I-126-10 See Common Response 4 Housing Alternatives.

I-126-10

- 2) **Strong support for Alternative 3 (**with necessary revisions as detailed in this comment letter**)**
- a) Strongly support the increased density of housing and jobs studied under Alternative 3
 - b) The Comp Plan is setting the stage for Bellevue's growth over the next 20+ years. No one can predict what that growth or future demand will look like, which is why allowing flexibility for different types of growth is vital.
 - c) Alternative 3 provides for the greatest potential of growth and flexibility of uses, both for housing growth and commercial/job growth.

I-126-11 See Common Response 16 Critical Areas.

I-126-11

- 3) **Critical areas ("CA")**, specifically stream buffers for Goff Creek, need to be studied to determine:
- a) The impact to development of maintaining existing buffers
 - b) The loss of housing units and consequently affordable housing of maintaining existing buffers
 - c) The increase to density and housing that could be achieved if buffers are reduced
 - d) The broader infeasibility of development on large sites, specifically Evergreen Center, given that 40% of the site is consumed by current CA buffers
 - e) The impact to the Comp Plan growth projections of the various Alternatives if large sites, such as Evergreen Center, are never able to re-develop due to the existing onerous CA buffers
 - f) The ecological benefit of allowing stream mitigation within reduced buffer areas to improve the habitat, i.e. Is it better to have onerous CA buffers that prevent any mitigation and re-development altogether, or is it better to have flexibility within the CA buffers to allow impactful mitigation to occur?
 - g) Allowing for creative habitat and ecological solutions which can be explored as an alternative to a linear setback
 - h) Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
 - i) The FEIS should study alternate stream designations, such as the "Urban Stream" designation used by Woodinville
 - j) The FEIS should study the use of "mitigation banking" as a means to reduce CA buffers while providing for an improved habitat via mitigation banks. *Note: mitigation banking is allowed in almost all other jurisdictions other than Bellevue, and is the preferred method of mitigation by Ecology, Corps of Engineers, and the Tribes.*
 - k) Please study an inclusion of an incentive in which a reduced 20- or 30-foot buffer / building setback could occur with either daylighting of currently piped creeks or the restoration of existing unimproved streams / creeks, such as Goff Creek, resulting in the restoration of ecological function.
 - l) Overall, the FEIS needs to study the relationship between CA requirements precluding sites from redeveloping and achieving CA mitigations. If the CA requirements are so onerous so as to prevent any re-development from occurring, then the CA will never realize any mitigation, which is exactly the opposite of the intent of the CA requirements. CA restoration only occurs if development can occur.

I-126-21 All alternatives use the same transportation network for the analysis which is the existing network plus new transportation investments adopted in the 2022-2033 Transportation Facilities Plan (TFP). Alternative 3 and the Preferred Alternative include the evaluation of the extension of NE 6th St as well. However, mitigation measures include expansion of pedestrian and bicycle facilities. The Bellevue Mobility Implementation Plan describes the vision of a complete and connected network for pedestrians and bicyclists. Throughout the city and especially in the urban core and near light rail stations, connections and safety for pedestrians and bicyclists is a priority.

I-126-22 See Common Response 17 BelRed Street Grid.

I-126-21

I-126-22

I-126-23

- 4) **Transportation:** Strongly support the transportation summary on pg. 74 of the DEIS, specifically where it states that, "...Bellevue should focus on building out the pedestrian and bicycle network...to further reduce single-occupant driver (SOV) driving demand..." and that, "Roadway or intersection capacity expansion should be a mitigation of last resort'..."
- a) Agree that Bellevue should prioritize pedestrian and bicycle pathways in lieu of single occupant drivers ("SOV")
 - i) FEIS should study the elimination and/or reduction of the current proposed street grid plan throughout Bel-Red, especially for large parcels within walking distance of the light-rail stations.
 - ii) The FEIS should do a comprehensive study of the existing Bel-Red street grid plan, and revise based on actual forecasted SOV demand. It should study:

I-126-23 This is outside of the scope of this EIS. See Common Response, Non-Project EIS vs. Project Level SEPA Review.

I-126

COMMENT

RESPONSE

<p>I-126-23</p> <p>I-126-24</p> <p>I-126-25</p> <p>I-126-26</p> <p>I-126-27</p> <p>I-126-28</p> <p>I-126-29</p> <p>I-126-30</p> <p>I-126-31</p>	<p>(1) Alternate means of accommodating local, on-site traffic</p> <p>(2) Any impractical proposed streets that either dead-end, run into steep slopes, are infeasible to build due to property line boundaries, or do not serve the intended purpose of improving SOV circulation.</p> <p>iii) FEIS should study the benefits of having more pedestrian wayfinding and bike paths throughout Bel-Red in-lieu of the current proposed street grid.</p> <p>iv) FEIS should further study the benefits to vehicular safety, car emissions, and pedestrian access across large sites by de-prioritizing SOVs</p> <p>b) Agree that parking minimums should be eliminated around light rail stations</p> <p>i) Strongly support parking maximums around light rail stations instead</p> <p>ii) FEIS should study various parking maximums and minimums, including:</p> <p>(1) the elimination of all parking requirements around light rail stations,</p> <p>(2) parking requirements based on parking demand studies rather than prescriptive requirements,</p> <p>(3) shared parking between uses</p> <p>c) FEIS should study the impacts to development, specifically on large sites such as Evergreen Center, of requiring the build-out of the current proposed street grid.</p> <p>i) FEIS should study the loss of housing units and consequently affordable housing if the current proposed street grid is required.</p> <p>ii) FEIS should do a comprehensive study of Bel-Red to understand how many parcels are impacted by the current proposed street grid. For example, as proposed the Evergreen Center site would be required to build two (2) roads, one east to west, a second north to south across the property. This would consume nearly one-third of the buildable area of the site and make development infeasible.</p> <p>iii) FEIS should study the actual benefits, if any, of the current proposed street grid, with a focus on local access only roads, and alternate ways of allowing properties to self-manage on-site vehicular, pedestrian and bike circulation.</p> <p>5) Site Specific Study on the Evergreen Center Property. Please study the following conditions as it relates to the Evergreen Center property – address 1830 130th Ave NE, Bellevue, WA 98005:</p> <p>a) Impact to housing density from existing Goff Creek buffer requirements</p> <p>b) Impact to housing density from the existing street grid plan</p> <p>c) Impacts of foregone Goff Creek ecological restoration if site redevelopment never occurs</p> <p>d) Loss of on-site affordable housing potential due to both A and B</p> <p>Thank you and best regards,</p> <p>Charlie Bauman 425-802-3352 charlie@guntowercapital.com</p>	<p>I-126-24 This specific request is outside of the scope of the FEIS. The Mobility Implementation Plan provides the vision for a complete and connected network for pedestrians and bicyclists. As resources are available, the network is being completed.</p> <p>I-126-25 See FEIS Chapter 11, <i>Transportation</i>, and DEIS Chapter 8, <i>Air Quality</i>.</p> <p>I-126-26 Details of parking regulations around light rail stops is outside of the scope of the EIS.</p> <p>I-126-27 Details of parking regulations around light rail stops is outside of the scope of the EIS.</p> <p>I-126-28 Site-specific development is outside of the scope of the EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review.</p> <p>I-126-29 Site-specific development is outside of the scope of the EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review.</p> <p>I-126-30 See Common Response 17 Bel-red Street Grid. The Mobility Implementation Plan provides the vision for a complete and connected network for pedestrians and bicyclists. As resources are available, the network is being completed.</p> <p>I-126-31 Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the growth alternatives, environmental impacts associated with the growth alternatives, and potential mitigation for the identified impacts across the study area. An evaluation of a development proposal for the Evergreen Center Property will take place during the city's project level land use review when an individual development project is proposed and undergoes project-level land use and environmental review.</p>
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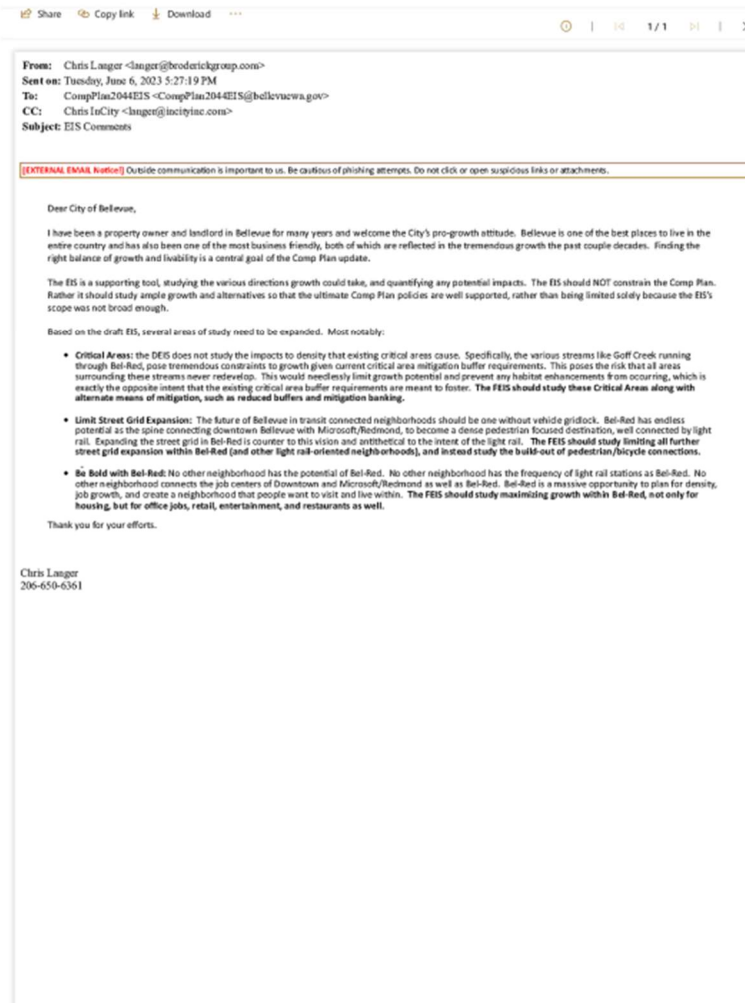
I-127

COMMENT

RESPONSE

- I-127-1 The proposed alternatives discussed in FEIS Chapter 2, *Preferred Alternative*, considers alternatives that include a range of housing and job capacities, housing types, and investments in infrastructure citywide and in the Wilburton study area.
- I-127-2 See Common Response 16 Critical Areas.
- I-127-3 See Common Response 1, BelRed Street Grid. The Mobility Implementation Plan provides the vision for a complete and connected network for pedestrians and bicyclists. As resources are available, the network is being completed.
- I-127-4 See Common Response 4 Housing Alternatives. See Common Response 17 Bel-Red Street Grid.

- I-127-1
- I-127-2
- I-127-3
- I-127-4



I-128

COMMENT

RESPONSE



I-128-1

I-128-2

- I-128-1 Please see Common Response 7, Parks and Open Space. Parking is analyzed in FEIS Chapter 11, *Transportation*, Section 11.5.3, Impacts Common to All Alternatives. As noted on FEIS page 11-62, new development will be required to build off-street parking in accordance with the Land Use Code and the city will continue to manage on-street parking through its curbspace management programs. No significant parking impacts are expected as a result of any of the alternatives citywide or for the Wilburton study area.
- I-128-2 See DEIS Chapter 10, *Public Services and Utilities*, for analysis of the impacts on water service and other city services.

I-129

COMMENT

RESPONSE

I-129-1

The Comprehensive Plan draft has not yet been completed. The EIS will inform the update to the plan and the updates to the Wilburton Neighborhood Plan.



I-129-1

I-130

COMMENT

RESPONSE

I-130-1 See Common Response 8 Air Quality/GHG.



I-130-1

I-131

COMMENT

RESPONSE

I-131-1 Comment noted. See Common Response 1 Non Project vs. Project Level SEPA Review.

I-131-2 Please see Common Response 7 Parks and Open Space. Parking is analyzed in FEIS Chapter 11, *Transportation*, Section 11.5.3, Impacts Common to All Alternatives. As noted on FEIS Chapter 11 *Transportation*, page 11-62, new development will be required to build off-street parking in accordance with the Land Use Code and the city will continue to manage on-street parking through its curbspace management programs. No significant parking impacts are expected as a result of any of the alternatives citywide or for the Wilburton study area.

I-131-1

I-131-2



I-132

COMMENT

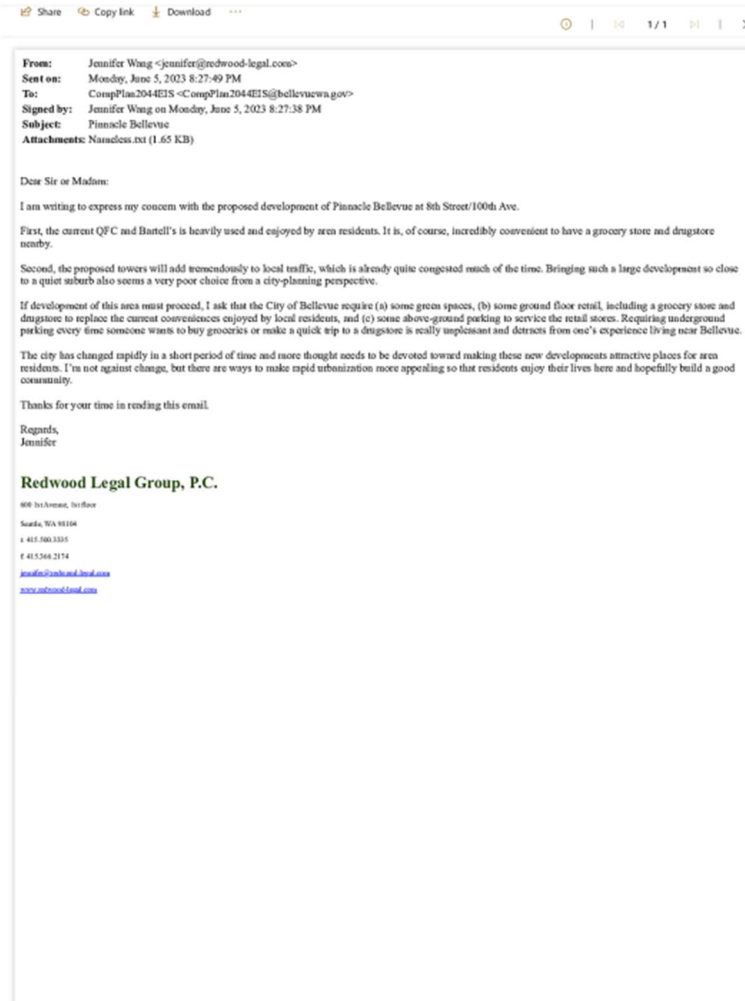
RESPONSE

I-132-1 Comment noted. See Common Response 1 Non Project vs. Project Level SEPA Review.

I-132-2 This project is unrelated to the analysis contained in the DEIS. The Pinnacle Bellevue project has undergone separate SEPA review, is subject to the city's adopted development regulations, and is currently in building permit review. As described on DEIS Chapter 1, *Summary*, page 1-3, the document provides a qualitative and quantitative analysis of environmental impacts associated with the Comprehensive Plan Periodic Update and Wilburton Vision Implementation proposal and alternatives, which consist of new policies and growth strategies.

I-132-1

I-132-2



I-133

COMMENT

RESPONSE

- I-133-1 See Common Response 1 Non Project vs. Project Level SEPA Review. See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.
- I-133-2 See Common Response 16 Critical Areas.
- I-133-3 See Common Response 17 BelRed Street Grid.
- I-133-4 A variety of future land use designations was studied on this site in the Action Alternatives and the Preferred Alternative. For details of the future land use categories, see DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.
- I-133-5 The study of specific catalyst projects is outside of the scope of the EIS. See Common Response 1 Non-Project EIS vs Project Level SEPA Review.
- I-133-6 Comment noted.

I-133-1

I-133-2

I-133-3

I-133-4

I-133-5

I-133-6



I-134

COMMENT

RESPONSE

I-134-1 Comment noted.

I-134-2 Comment noted.

I-134-3 This area was studied with future land use designations of MO-H-2, MU-H-2 (on the east side of the street) and MI (on the west side of 116th) in the Preferred Alternative. For more details about the future land use designations studied, see DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.

I-134-4 See response to I-134-3.

I-134-5 Comment noted.

I-134-6 Comment noted.

I-134-7 Comment noted.

I-134-8 The descriptions of the land use categories in the FEIS are meant to be general descriptions of urban form. The specific development requirements for zones within each category would be detailed in the Land Use Code. However, the city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 19 Zoning Details.

I-134-9 See Common Response 1 Non-Project EIS and Project Level SEPA Review. Analysis of the number of parking spots required for properties in Bellevue is outside of the scope of this analysis.

I-134-10 Comment noted.

I-134-11 Comment noted. Site-specific details are outside the scope of this EIS.

- I-134-1
- I-134-2
- I-134-3
- I-134-4
- I-134-5
- I-134-6
- I-134-7
- I-134-8
- I-134-9
- I-134-10
- I-134-11



I-135

COMMENT

RESPONSE

I-135-1 Comment noted.

I-135-1



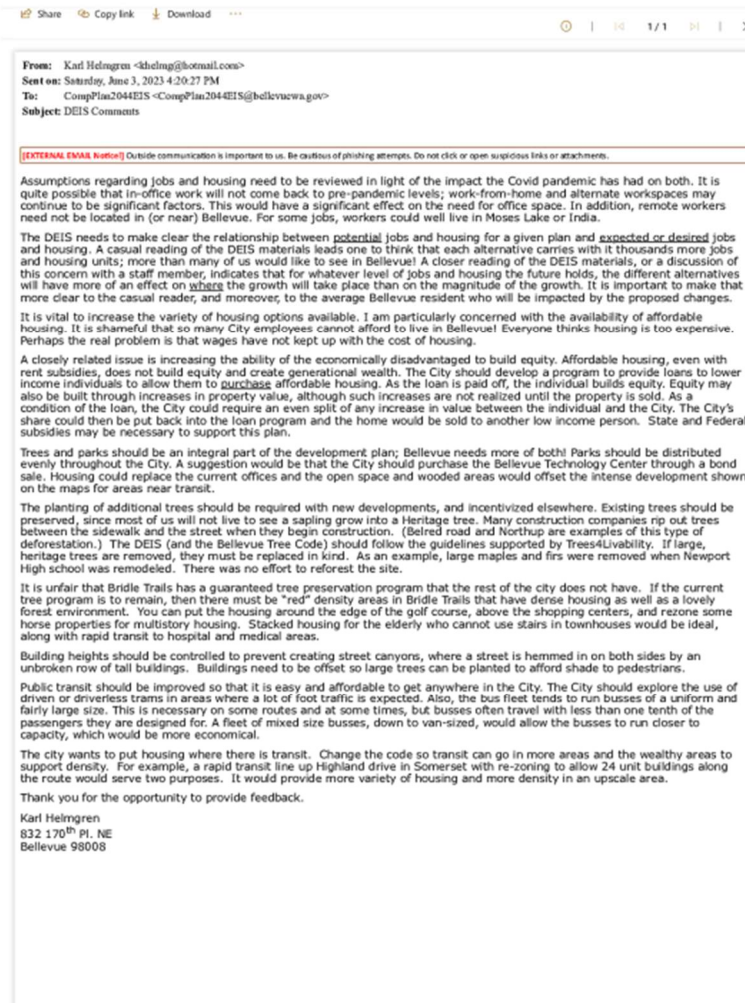
I-136

COMMENT

RESPONSE

- I-136-1 See Common Response 11 Impact of COVID 19. See Common Response 13 Growth Targets.
- I-136-2 See Common Response 4 Housing Alternatives.
- I-136-3 Comment noted. See Common Response 14 Equity and Environmental Sustainability Metrics.
- I-136-4 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Spaces.
- I-136-5 See Common Response 2 Tree Canopy.
- I-136-6 See Common Response 2 Tree Canopy.
- I-136-7 All projects will be required to adhere to the City's existing development regulations and future zoning standards that would implement the updated comprehensive plan. See DEIS Chapter 6, *Aesthetics*, and DEIS Chapter 3, *Land Use Patterns and Urban Form*, for more information about the impact to urban form.
- I-136-8 See Common Response 4 Housing Alternatives. The FEIS includes analysis of greater density in housing across the city. The EIS also provides environmental analysis, identifies potential impacts, and identifies mitigation for potential impacts associated with greater density in housing across the city. Transit agencies, not the City of Bellevue, provide transit service.

- I-136-1
- I-136-2
- I-136-3
- I-136-4
- I-136-5
- I-136-6
- I-136-7
- I-136-8



I-137

COMMENT

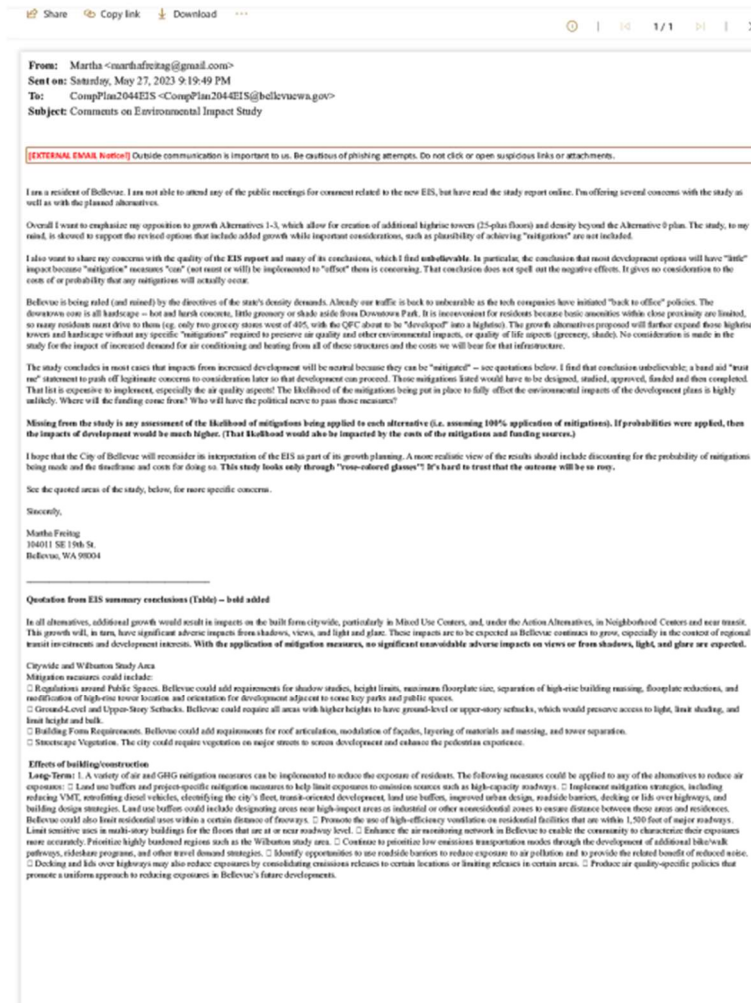
RESPONSE

I-137-1 The EIS documents potential impacts of actions by the City and identified measures to minimize those impacts. The City may implement some, all or none of the mitigation measures and it may also take measures not identified in the EIS. The city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 22 Mitigation Measures Required.

I-137-2 The purpose of an EIS is to identify potential environmental impacts of development and steps that the city can take to avoid or mitigate those impacts. Some impacts are unavoidable and that is noted in the EIS document. See Common Response 8 Air Quality and GHG for more information on how air quality was analyzed in this EIS. The impact to utilities is covered in DEIS Chapter 10, *Public Services and Utilities*. The likelihood of the City adopting mitigation measures is outside of the scope of this EIS. See Common Response 22 Mitigation Measures Required. The EIS analyzes a buildout scenario, which is more growth than would be expected by the 2044 Comprehensive Plan horizon. See Common Response 13 Growth Targets for more information on the growth expected by 2044.

I-137-3 See DEIS Chapter 6, *Aesthetics*, for a discussion of impacts to views, shadows, light, and glare.

I-137-4 See Common Response 8 Air Quality/GHG.



I-138

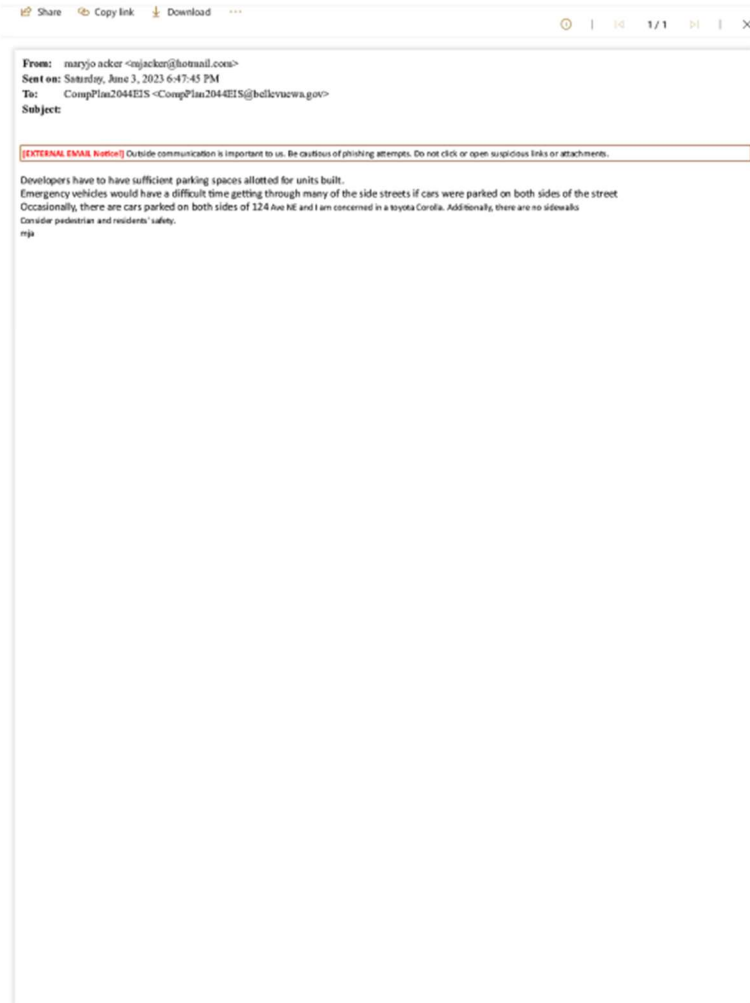
COMMENT

RESPONSE

I-138-1 See FEIS Chapter 11, Transportation for additional information on parking.

I-138-2 Pedestrian facilities are included as a mitigation measure in the FEIS Chapter 11, *Transportation*. The Bellevue Mobility Implementation Plan provides the vision for a complete and connected network for pedestrians and bicycle riders. Projects are installed as city resources are available and as developers install sidewalks together with new buildings and subdivisions.

I-138-1 |
I-138-2 |



I-139

COMMENT

RESPONSE

I-139-1 Comment noted.

I-139-2 Comment noted. See Common Response 1 Non Project vs. Project Level SEPA Review.

I-139-3 Comment noted.

I-139-4 Comment noted. See DEIS Chapter 6, *Aesthetics*, for additional information.

I-139-1
I-139-2
I-139-3
I-139-4



I-140

COMMENT

RESPONSE

I-140-1 Each action alternative studied in the EIS provide for additional development capacity near light rail stations (except near the South Bellevue station where environmental constraints exist).

I-140-1



I-141

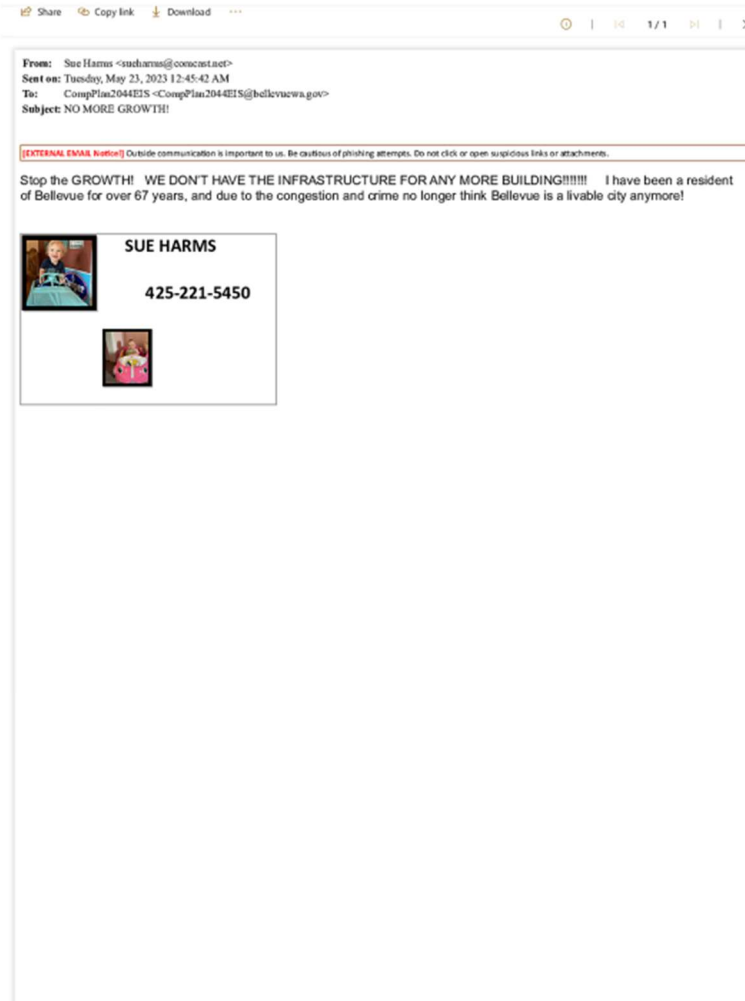
COMMENT

RESPONSE

I-141-1 Comment noted.

I-141-2 Comment noted.

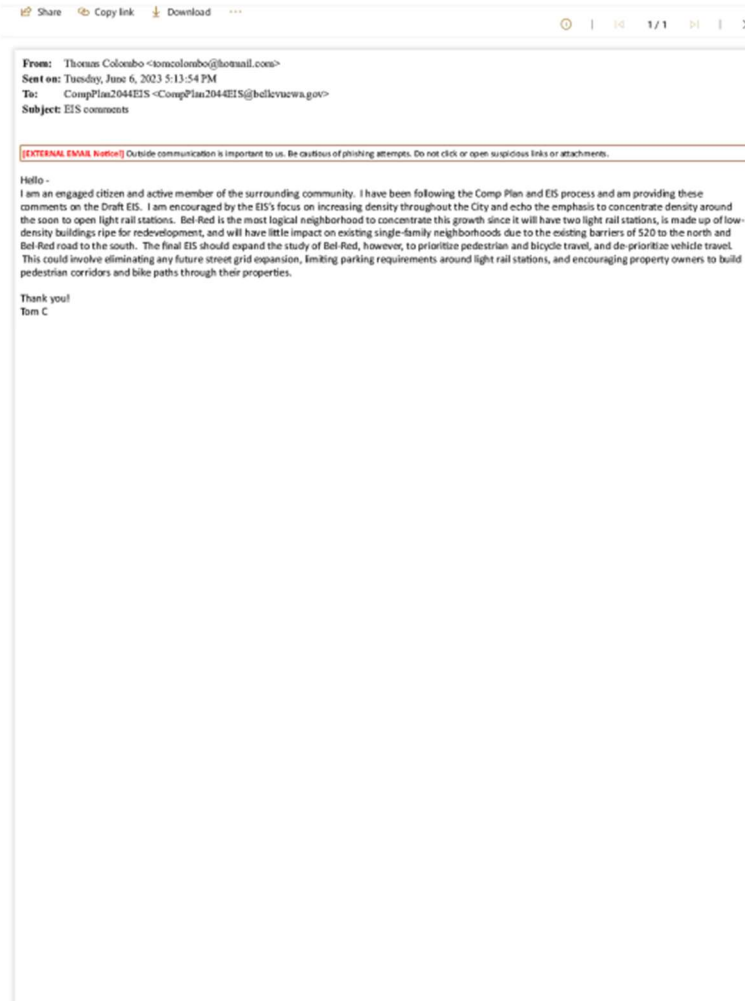
I-141-1 |
I-141-2 |



I-142

COMMENT

RESPONSE



I-142-1

I-142-2

I-142-1 All alternatives use the same transportation network for the analysis which is the existing network plus new transportation investments adopted in the 2022-2033 Transportation Facilities Plan (TFP). Alternative 3 and the Preferred Alternative include the evaluation of the extension of NE 6th St as well. To provide mobility options for new residents and workers, the Mobility Implementation Plan established the vision for a complete and connected multimodal network, and the Bike Bellevue project focuses on the bicycle facilities for the urban core, including BelRed. FEIS Chapter 11, *Transportation*, includes mitigation measures such as expanding pedestrian and bicycle facilities. The city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

I-142-2 See Common Response 17 BelRed Street Grid.

I-143

COMMENT

RESPONSE

I-143-1 See Common Response 8 Air Quality/GHG.

Comments Comprehensive Plan DEIS #2

This is a second and separate submission from me.

Barbara Braun - 13609 SE 43rd Place

I-143-1

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

I-143-2 See Common Response 11 Impacts of Climate Change. See Common Response 15, Climate Change and State Planning Framework.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element – described in the [2021 budget \[Section 129 \(126\)\]](#) – must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

I-143-2

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

	COMMENT	RESPONSE
<p>I-144</p> <p>Bellevue 2044 Draft EIS - comment / Steve Williams, 38 year Wilburton resident - 6/11/2023</p>		
<p>I-144-1</p> <p>It is difficult to evaluate these job and population projections, but one thing is clear, this is a development blueprint, not an Environmental Impact Statement. The environmental consequences are not even looked at, or worse - "no adverse environmental impact" is stated.</p>		<p>I-144-1 Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review, which explains that the EIS studies a range of alternatives to support the consideration of plans, policies, or programs. Overall findings, including any significant unavoidable adverse impacts identified in DEIS Chapters 3 through 11 are summarized in Chapter 1, <i>Summary</i>, Table 1-2 (see DEIS pages 1-19 through 1-34) and page 1-35.</p>
<p>I-144-2</p> <p>The population numbers are astounding. Even at 2 persons per household unit in Wilburton, the result is 33 times the current population of 546 stated in Ch. 5-2. (Alt.1: 9,200 units x 2 = 18,400 people). (Alt. 2: is worse, 14,200 units x 2 = 28,400, or 52 times current population).</p> <p>In other words, Alt.1 gets us over 33 times the current number of people on our streets, in our schools, stores, and parks; all needing water, sewer, garbage and power; putting huge demands on supply stores, roads, transit, police, fire, medical and library services, etc.</p>		<p>I-144-2 See DEIS Chapter 5, <i>Population and Employment</i>. As discussed in Section 5.3.2, alternatives include analysis of the "build-out" housing unit capacity associated with each alternative. It is not expected that the "buildout" housing capacity would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with each of the alternatives. The additional capacity provides more flexibility in how the City can reach the housing target.</p>
<p>I-144-2</p> <p>Utilizing the US 'urban household average' of 2.6 persons per household, the increase is 23,920 or 43.8 times more people for Alt.1. / If our future has more single employees and retired apartment dwellers, the increase is still over 26 times current population. (1.6 x 9,200 = 14,720). / In our small, seven house cul-de sac, five houses have new families moved in - with a total now of 7 young children and at least two more expected. With the new law allowing unrelated occupants and 'mega houses' being built, it looks like the Wilburton neighborhood average will be 2.6 or larger....</p> <p>As a 38 year resident, I still can't envision a life here with 43 to 52 times more people than we have now. Quality of life will suffer.</p> <p>-----</p>		
<p>I-144-3</p> <p>As to environment - the impact will be huge: What is the carbon footprint of 28,000 people? Where will all the water come from? Where will all the waste water and garbage go? Where will the needed power and food come from? How many schools will we need?</p>		<p>I-144-3 See DEIS Chapter 10, <i>Public Services and Utilities</i>. See Common Response 7 Parks and Open Space. See Common Response 9 Plants and Animals.</p>

I-144

COMMENT

RESPONSE

I-144-0 How can even our sidewalks handle that many people? How can we save park lands?
Our trails and parks will be overwhelmed by new people wanting escape from cubicles & city life.
Will any native creatures remain with all the disruption, noise, heat, polluted air & water?
Where does a person find peace, quiet, solitude, communion with nature?

I-144-4 In addition to all the utility and infra-structure questions, I think we need to address the human and emotional needs for freedom of movement, access to nature, 'elbow room' and 'green space.' If there are high-rise, tiny apartments and work spaces, there will need to be adjacent gymnasiums and gardens, playfields and parks. We may need mid-tower school rooms, open courtyards and inside farms and arboretums. We may need to accept far more mass transit, and cars for rental 'out of town only' use. Dispersal of people to rural areas, regional parks and preserves might be accomplished by train or 'bus to trailhead' service. High-rise outer walls can also be green plant spaces and solar collector walls. Lids over freeways can become open space parks and exercise fields. Rain, whenever it comes, must be saved by every means possible. (Gray water conserved & filtered). Trees and shrubs need to be planted along every sidewalk, and large trees in every parking lot. (compare the Best Buy & Home Depot lots with those in office parks to the east & south).

I-144-4 Please see Common Response 7 Parks and Open Space.

I-144-5 Comment noted.

I-144-6 See Common Response 2 Tree Canopy.

I-144-7 See Common Response 7 Parks and Open Space.

I-144-8 Comment noted.

I-144-8 Like many other Bellevue residents, we moved here because of good schools, parks, trails, open space and nature. Wilburton is a wonderful neighborhood because people have space for yards, gardens and trees that they care for. We would not want to live in tall metal & cement boxes next to a freeway.

Packing the maximum number of people into the city is not a full solution,

- Habitat & Quality of Life must be part of the equation.

I-145

COMMENT

RESPONSE

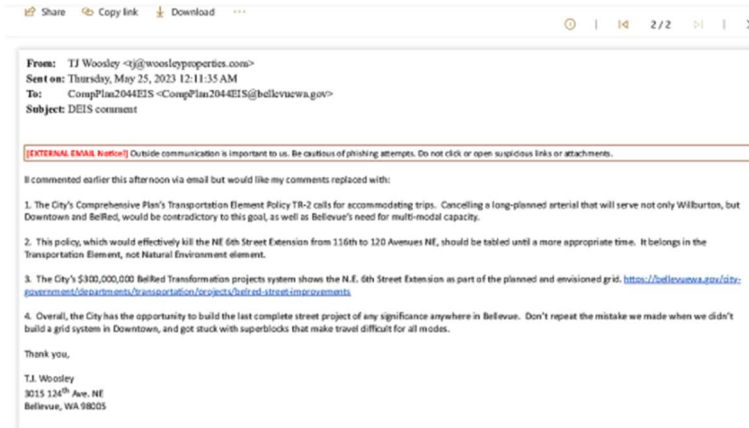
I-145-1 Comment noted.

I-145-2 See FEIS Chapter 11, *Transportation*. Analysis includes the extension of NE 6th to both 116th & 120th.

I-145-3 Comment noted.

I-145-4 In Wilburton, a local street grid is needed to provide access to buildings for parking, service/maintenance, and emergency response. Each local street provides an opportunity for better pedestrian and bicycle access.

I-145-1 |
I-145-2 |
I-145-3 |
I-145-4 |



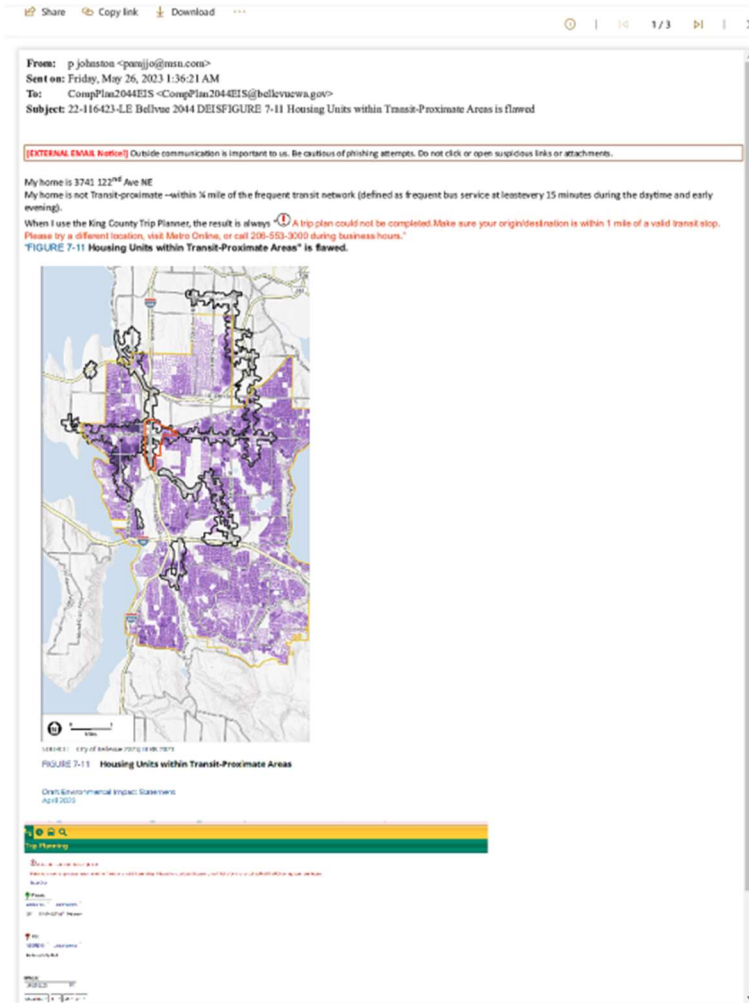
I-146

COMMENT

RESPONSE

I-146-1 The address listed in the comment is not within the frequent transit network shown in DEIS Chapter 7, *Housing*, Figure 7-11. Land Use changes due to transit proximity have been removed from the Preferred Alternative.

I-146-1



I-147

COMMENT

RESPONSE

I-147-1 | You have the difficult job planning for a growing city - Bellevue. In so doing, I urge you to protect the natural environment as much as you can - a nearly impossible task.
Karen Yellman

I-147-1 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space.

I-148

COMMENT

RESPONSE

I-148-1



I-148-1 The numbering in the first column corresponds to the EIS chapter. EIS Chapters 1 and 2 are the Introduction and Summary, and Alternatives, respectively. As explained on FEIS Chapter 1, *Introduction and Summary*, page 1-18, Table 1-2 summarizes the results of the environmental evaluation of alternatives detailed in Chapters 3 through 12.

I-149

COMMENT

RESPONSE

I-149-1



I-149-1 The FEIS PDF file has been prepared such that the table of contents links to the appropriate chapters.

I-150

COMMENT

RESPONSE

I-150-1 See Common Response 4 Housing Alternatives.

I-150-2 A substantial amount of growth is directed to the areas around the light rail stations in all of the alternatives - with the exception of the South Bellevue station where wetlands/park and steep slopes constrain development potential.

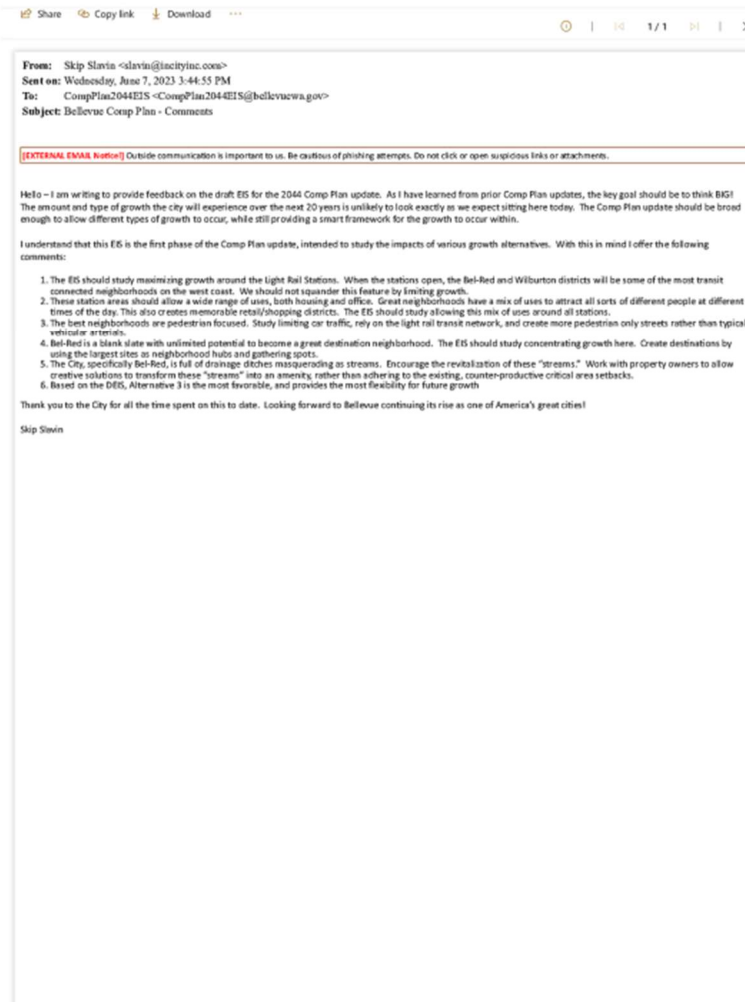
I-150-3 Near each light rail station, all alternatives studied in the EIS allow for a mix and intensity of uses that are intended to create and support vibrant, walkable neighborhoods.

I-150-4 All of the Alternatives studied in the EIS support growth near light rail stations in a manner that is oriented toward walkability.

I-150-5 In the BelRed Subarea, the existing planning calls for a substantial amount of growth to be focused around the light rail stations. All of the Action Alternatives would add an increment of growth potential to the station areas.

I-150-6 Existing policies for the BelRed Subarea call for natural stream corridors to be protected and rehabilitated as development/redevelopment occurs.

I-150-7 Comment noted.



I-150-1

I-150-2

I-150-3

I-150-4

I-150-5

I-150-6

I-150-7

I-151

	COMMENT	RESPONSE
I-151-2 I-151-1	As President of Brentwood Lane (NE48th Place) a smaller Bridle Trails' neighborhoods, I concur with the DEIS comments submitted by the Bridle Trails Community Club. Please make this request as a party of record and send future correspondence regarding City efforts to refine the DEIS.	I-151-1 You are added as a party of record. I-151-2 Comment noted.

I-152	COMMENT	RESPONSE
Comments Comprehensive Plan DEIS #2	I-152-1 See Common Response 8 Air Quality/GHG.	
I-152-1	The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan. The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. Link From the Department of Commerce's website: "The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element — described in the 2021 budget [Section 129 (126)] — must be completed by June 2023 and must integrate input from fellow state agencies and other partners." The draft Guideline and development timeline can be found here: 1. Draft Guideline – post as of May, 2023 2. Development Timeline - The initial products - the model elements - are due by June 30, 2023.	I-152-2 See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.
I-152-2	Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS. Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets. The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.	I-152-3 See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.
I-152-3	Bellevue should stand out as a large municipality who is taking climate action seriously.	I-152-4 See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.
I-152-4	Thank you!	

	COMMENT	RESPONSE
I-153	Thank you for the opportunity to comment.	I-153-1 Comment noted.
	<p>My comments below are based on your distributed written materials, public meetings and some discussion with members of the committee and city counsel.</p> <p>Categorically, they should not be interpreted as expressing support for or against whether the proposed new housing units in the draft plans should be occupied by owners or renters.</p>	<p>I-153-2 See DEIS Appendix G, <i>Relationship of Climate Vulnerability to Alternatives</i>, for information on potential mitigation measures such as building codes that require efficient heating and cooling systems.</p> <p>I-153-3 Analysis of permitting requirements is outside of the scope of the EIS.</p>
	I write to express 3 concerns about the draft plan.	I-153-4
I-153-1	1. Lacks analyses of potential differences in impact that renter versus owner-occupied units may have on the city's resources, near term development or long term planning.	See FEIS Chapter 1, <i>Introduction and Summary</i> , Table 1-1 for Comparison of Project and Non-Project Environmental Review. This document is a non-project EIS that analyzes the growth alternatives, impacts associated with those growth alternatives, and potential mitigation for the identified impacts across the study area, not on specific construction proposals.
I-153-7	The analyses provided focus success on affordability and projected job growth with the latter assuming a steady state job market.	Identified mitigations are broader; such as changes to policies, plans, or code. The city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations.
I-153-6	I didn't find models or plans or mention that the committee considered fluctuations in the job market and how services, development and planning might be affected based on percent owner versus renter-occupied housing.	I-153-5 See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.
I-153-2	2. No analysis of renter or owner-occupant new housing units with regard to reserves requirements. Adequate reserves being necessary to long term maintenance the new structures. Reserves spending is one of the most contentious issues that affecting multi-unit housing communities. Maintaining structural integrity is critical to good building environmental stewardship. Therefore, the growth plan should consider strategies that assure long term maintenance of new multi-family buildings that are consistent with climate targets as adopted by the city. By way of example, requirements for developers and owners (Businesses owned or HOA/COA) to maintain adequate reserves as part of the permitting process or articles of incorporation.	I-153-6 1. The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning time frame. 2. The City does not own or operate multifamily housing and therefore is not responsible for the maintenance of these structures.
I-153-3	3. The environmental impact section is focused solely on mitigating the short term environmental issues that are anticipated during construction. I understand that this is a development plan and not focused on climate issues such as the production of GHG. However, it is short sighted at best and disingenuous at worst, to not include analyses of how the city's proposals for growth stand to influence city's stated climate goals. Influences that may be significantly different based on the relative percentage of owner versus renter	I-153-7 Comment noted. See Common Response 4 Housing Alternatives.

I-153	COMMENT	RESPONSE
I-153-5	<p>occupied housing.</p> <p>While the draft focuses on growth and development this should not be an excuse to avoid consideration of the plan's potential impact on the city's climate targets. Government should not conduct its business in silos. Climate, like Equity is a significant concern of Bellevue residents and should be considered in all city planning.</p> <p>Thank you again for the opportunity to address these concerns to the committee.</p> <p>Sincerely,</p> <p>William H. Marks, M.D., Ph.D. Bellevue Resident</p>	
I-154	COMMENT	RESPONSE
I-154-1	<p>I can see where an incremental increase in density may be warranted but this drastic of a change is inviting a significant impact to our community and environment. Having gone thru the arduous process of a short plat ourselves along Kelsey Creek, I just don't see how it is responsible to have this kind of crazy density without an unbiased EIS conducted as to the real negative impact to the water and tree canopies that cannot be mitigated and will forever change the environment that you are suppose to be good stewards of. Please reconsider!</p>	I-154-1 Comment noted.
I-154-2		I-154-2 See Common Response 3 Water Quality.
I-154-3		I-154-3 See Common Response 2 Tree Canopy.
I-155	COMMENT	RESPONSE
I-155-1	<p>I wish to be a party of record. Please confirm receipt of the attached file 'CompPlanDEIS_Comment_DCagle.pdf' and that it is part of official comments to the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement (EIS) - File Number: 22-116423 LE</p>	I-155-1 You are added as a party of record.

I-155

COMMENT

RESPONSE

From: David Cagle davidc@clearfocusengineering.com
 12911 SE 1st Street, Bellevue WA
 Sent: Monday June 12, 2023
 To: City of Bellevue
 Subject: Comments on the City of Bellevue 2024-2044 Comprehensive Plan Draft Environmental Impact Statement dated 2023.

I recently learned of the City of Bellevue's proposed changes to its 2024-2044 Comprehensive Plan that would dramatically change the zoning for a portion of the Wilburton neighborhood. A Draft Environmental Impact Statement was published April 27, 2023 with a 45-day public comment period. Please include my comments below to the responses received from the public.

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

This section evaluates "Citywide Impacts" and "Wilburton Study Area Impacts" for the four alternatives. Nowhere does it specifically address impacts to the Wilburton Neighborhood (Census Tract 236.01) that is not part of the study area. The changes proposed to the by Alternatives 1-3, immediately adjacent to the Wilburton single-family residential neighborhood is likely to be impacted much more severely than the Citywide Impacts. Implied by the DEIS is that impacts to residences immediately to the East of the Study Area would be equivalent to the citywide impacts.

1.7.6 Aesthetics

Alternative 1-3 Citywide Impacts are claimed to be essentially equivalent to Alternative-0:
In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers

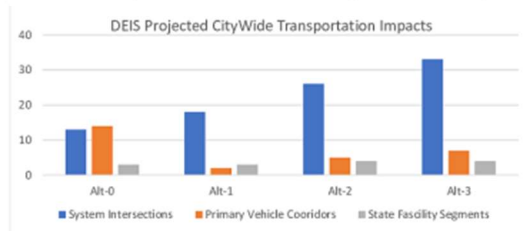
"With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected."

Alternatives 1-3 propose building heights up to 16 stories immediately adjacent to the Wilburton neighborhood. How will they not make adverse impacts on views and from shadows? What mitigation measures are envisioned that would result in no adverse impacts?

1.7.11 Transportation

Alternative 1-3 Citywide Impacts are claimed to be essentially equivalent Alternative-0:
All alternatives are expected to have significant impacts on System Intersection volume-to-capacity (V/C), Primary Vehicle Corridor travel speed, and state facilities (with other potential impacts expected to be at a less-than-significant level).

Reformatting the data presented in the table results in plot below. It shows Alt-1 essentially the same as Alt-0, while Alt 2-3 are represented as somewhat worse for system intersection impacts.



I-155-2

I-155-2 The Wilburton study area was identified as an area for additional analysis in the EIS, the rest of the city is analyzed more broadly. See FEIS Chapter 1 *Introduction and Summary*, Table 1-1 for Comparison of Project and Non-Project Environmental Review. This document is a non-project EIS that analyzes the growth alternatives, environmental impacts associated with those alternatives, and potential mitigation for those identified environmental impacts across the study area and throughout the city. The city may incorporate the environmental analysis and mitigation for potential impacts identified in the EIS into its policies, codes, standards, or regulations.

I-155-3

I-155-3 See the mitigation measures proposed in DEIS Chapter 6, *Aesthetics*.

I-155-4

I-155-4 See updates to the transportation analysis in FEIS Chapter 11, *Transportation*.

I-155

COMMENT

RESPONSE

I-155-5	<p>Mitigation Measure are then broken down by metric referred as Performance Management Areas (PMA) but all are essentially different favors of.</p> <ul style="list-style-type: none"> • continue to partner with King County Metro and Sound Transit • focus primarily on building out the pedestrian and bicycle network • continue to implement countermeasures reducing risks to vulnerable pedestrians and bicyclists. • mitigate on-street parking demand with existing curbspace programs and Curb Management Plan. • ensure codes, standards, regulations, and Transportation Plans are adopted to address impacts <p>With a couple of mitigation measures for state facilities as:</p> <ul style="list-style-type: none"> • coordinate and partner with SDOT on transportation investments. • Consider exceptional TDM (transportation demand management) 	I-155-5	Comment noted.
I-155-6	<p>The DEIS doesn't reflect the likely impacts specifically to the Wilburton neighborhood. The Wilburton neighborhood has limited access roads, primarily 124th Ave NE, SE 7th Pl, 129th Pl NE, and 131st Ave NE. These 4 routes currently experience high volumes of cut-through traffic Monday thru Friday during the morning and evening rush hours. The cut-through traffic routinely creates a bottle neck at the Main St / NE 1st Street intersection and the SE 7th Pl / Lake Hills Connector intersection.</p> <p>The DEIS should provide a much more fine-grained analysis of the traffic impacts to the Wilburton community, specifically to its access intersections that already encounter large impacts. The analysis should anticipate likely changes to Bellevue's roads that will be necessitated by development in the Wilburton Study Area and analyze those impacts as well. Finally, the DEIS should analyze likely impacts to fire and medical response times to the Wilburton community.</p>	I-155-6	See Common Response 1 Non-Project EIS vs Project Level SEPA Review. Impacts to fire and medical response across the city are included in DEIS Chapter 10, <i>Public Services and Utilities</i> , Section 10.3.
I-155-7	<p>General Comment on the Wilburton Vision proposed Alternatives 1-3.</p> <p>To this 25+-year resident of Wilburton, all three alternatives appear extreme and ill conceived. The King County Planning Policy specifies 2019-2044 housing target of 35'000. What motivates zoning changes to the Wilburton area that represent 26% - 40% (9'200 - 14'300) of that total?</p> <p>As of 2020, the census tract for Wilburton (236.01) had a population 4,412 (2.9% of the Bellevue's 151'584 total). It would seem that any of Alternatives 1-3 would direct 26% - 40% of Bellevue's future population growth into an area that currently comprises less than 3% of Bellevue's population. If the City of Bellevue must shoulder the burden imposed by the Growth Management Act, why is it indiscriminately forced on the Wilburton community?</p> <p>The traffic impacts created by any of Alternative 1-3 will fall unfairly on the Wilburton Community. In this reader's opinion, the traffic impacts are downplayed and under analyzed. The mitigation measures are anemic and ineffectual. The Wilburton community currently encounters large volumes of cut through traffic due to its close proximity to Bellevue's urban core. At times, ingress and egress to the community is currently severely restricted. If adopted, any of Alternative 1-3 will exacerbate and already painful situation.</p> <p>With their focus on mid- and high-rise office towers, Alternatives 1-2 seem to envision a pre-pandemic world with large numbers of white-collar office workers together in offices. To this reader, that seems ill-conceived. The emphasis on housing of Alternative-3 seems preferred, but Alternative-3 also has the highest building heights adjacent to the Wilburton community to the east.</p> <p>For these reasons, I implore Bellevue City to select Alternative-0, No Change. A much lower impact zoning change is warranted, especially to the east of the new light rail. I'm sure that there are lower impact solutions that meet our housing and job requirements without the heavy-handed burden imposed on the Wilburton community.</p>	I-155-7	See DEIS Chapter 5, <i>Population and Employment</i> . As discussed in Section 5.3.2, alternatives include analysis of the "build-out" housing unit capacity associated with each alternative. It is not expected that the "buildout" housing capacity would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with each of the alternatives. The additional capacity provides more flexibility in how the City can reach the housing target. The growth in Wilburton is consistent with the Wilburton Vision. See DEIS Chapter 1, <i>Summary</i> , for more information.
I-155-8		I-155-8	Comment noted.

I-156

COMMENT

RESPONSE

I-156-1 In the Preferred Alternative, the parcels were studied with future land use of BR-MOR-H-2 on the two properties along 116th and BR-RC-H-1 on the property at 130th & 20th. Additional details can be found in DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*. See Common Response 19 Zoning Details as well.

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 524 2nd Ave., Suite 500 office 206.587.0700
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June 12, 2023

VIA EMAIL

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

Re: Public Comment
 City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and
 Wilburton Vision Implementation Environmental Impact Statement (EIS)
 File Number: 22-116423 LE

Dear Ms. Johnson:

We represent Roger White (“**Mr. White**”), owner of two properties in the City of Bellevue, the first located at Tax Parcel Nos. 282505-9103 and 282505-9290, and a separate site assigned Tax Parcel No. 262505-9217. We have reviewed the three Alternatives analyzed in the Draft Environmental Impact Statement (“**DEIS**”) as options for the 2024 Comprehensive Plan update. On behalf of Mr. White, we wish to provide the following comments.

Mr. White’s properties are strategically located in prime areas that boast convenient proximity near the future East Link Light Rail Stations. Parcel Nos. 282505-9103 and 282505-9290 are located along 116th Ave NE and currently zoned BelRed Medical Office (“**BelRed Medical Property**”). Parcel No. 262505-9217 is located on Bel-Red Rd. and currently zoned Office (“**NE 20th Office Parcel**”).

Mr. White’s NE 20th Office Parcel currently allows for multifamily housing under the Office zoning, albeit at a low density. However, the land also falls under Planning District B of the Crossroads Subarea overlay, and standalone housing is not permitted within District B. Under all three alternatives proposed by the City for the 2024 Comprehensive Plan update and analyzed in the DEIS, the property will continue to be zoned Office. At this time, it is unclear whether or not the City intends to lift the Planning District B limitation and unclear what uses will be allowed under the new Office zoning. The existing zoning classification, in a building and area which primarily caters to retail establishments, poses significant challenges when it comes to leasing the property. Therefore, any new zoning designation for Mr. White’s Office Parcel that fails to include additional use flexibility, including allowing housing would be a missed opportunity.

[04794603.DOCX:6]

nsper@cairncross.com
 direct: (206) 254-4117

I-156-1

I-156

COMMENT

RESPONSE

I-156-2 See Common Response 19 Zoning Details.

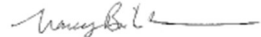
City of Bellevue Development Services Department
June 12, 2023
Page 2

Mr. White's NE 20th Office Parcel is less than 1-mile from the future Overlake Village Link Light Rail Station. This advantageous positioning, coupled with its proximity to Highland Middle School, grocery stores, shopping centers, and housing-supportive businesses, makes it an excellent opportunity for residential development. Providing for broad, flexible uses on Mr. White's NE 20th Office Parcel is especially appropriate when analyzed through the lens of neighboring lands. Nearby parcels benefit greatly under the proposed alternatives for the 2044 Comprehensive Plan, while Mr. White's property does not. For example, nearby properties on Bel-Red Rd. are planned to be rezoned to Mixed Use – Midrise ("MU-M") zoning under Alternative 1 and Mixed Use – Highrise – 1 ("MU-H-1") under Alternatives 2 and 3. The proposed zoning change for the NE 20th Office Parcel will align with the preferences of neighboring property owners in the area, and the City's proposed zoning for the area. We recommend that Alternative 3 be modified to extend the MU-H-1 zoning classification including to Mr. White's NE 20th Office Parcel, and that Alternative 3 be the Preferred Alternative analyzed in the Final EIS.

Mr. White's BelRed Medical Property does not currently allow for housing under the existing zoning classification. Under the alternatives presented in the DEIS for the 2024 Comprehensive Plan update, Alternative 3 provides for the greatest flexibility and best possible outcome with respect to housing. Under Alternatives 1 and 2, Mr. White's property would be rezoned to BelRed – Medical Office Highrise – 2 ("BR-MO-H-2"). While it is unknown precisely what uses this zoning classification will allow, Alternatives 1 and 2 do not appear to prioritize housing in this location. Under Alternative 3, Mr. White's property would be rezoned to BelRed – Medical Office/Residential Highrise – 2 ("BR-MOR-H-2"). The DEIS describes this zoning as mostly medical office with some housing, retail & services, in highrise towers up to around 24 Stories. We urge the City to prioritize flexibility in housing and acknowledge current market conditions related to office development. The potential residential uses associated with housing for medical center staff and patients' relatives, combined with the maximum height and density allowances, would greatly complement the adjacent Bellevue Children's Hospital and utilization of the area. We recommend that Alternative 3 be clarified to ensure it includes sufficient flexibility as to housing and office uses, and that Alternative 3 be the Preferred Alternative analyzed in the Final EIS.

In conclusion, Mr. White's properties should be designated to allow for highest density and flexibility related to housing development. The properties have excellent access to transit with future Link Light Rail Stations nearby and the properties can accommodate multi-story multifamily development that help meet the City's housing needs. Thank you for your time and thoughtful consideration.

Very truly yours,



Nancy Bainbridge Rogers

NBR:alw

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I-157

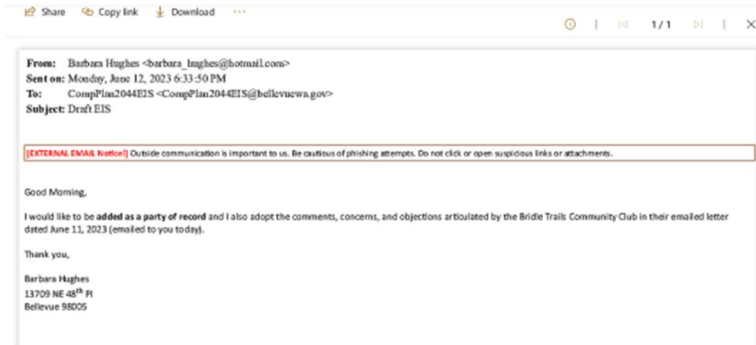
COMMENT

RESPONSE

I-157-1 You are added as a party of record.

I-157-2 Comment noted.

I-157-1 |
I-157-2 |



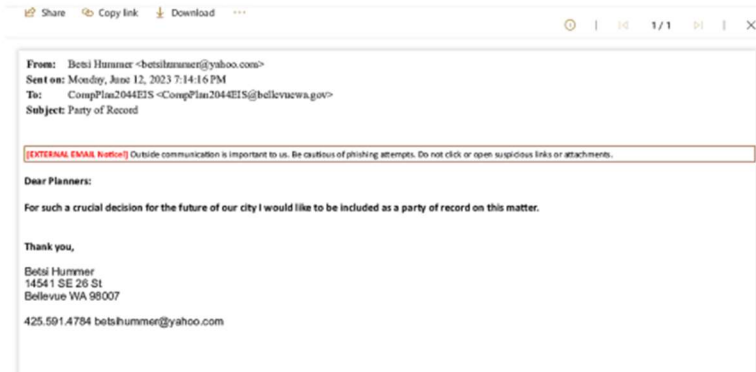
I-158

COMMENT

RESPONSE

I-158-1 You are added as a party of record.

I-158-1 |



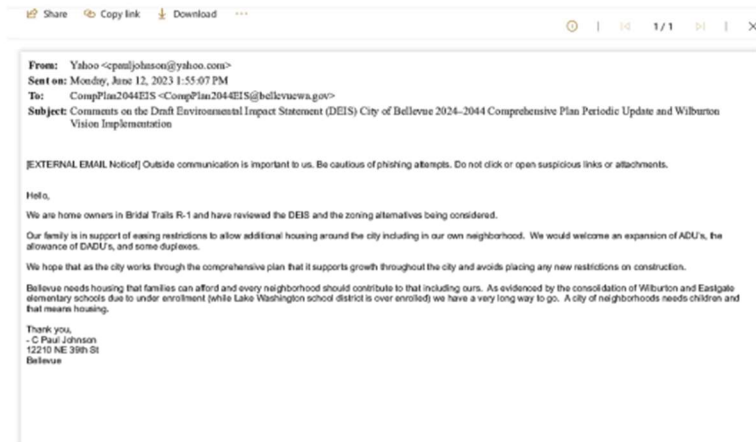
I-159

COMMENT

RESPONSE

- I-159-1 Comment noted.
- I-159-2 Comment noted.
- I-159-3 Comment noted.
- I-159-4 See Common Response 4 Housing Alternatives.

- I-159-1 |
- I-159-2 |
- I-159-3 |
- I-159-4 |



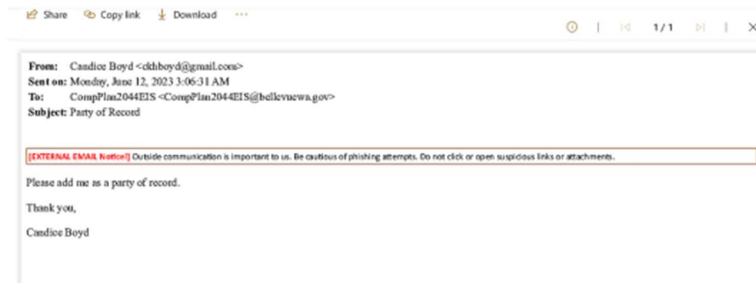
I-160

COMMENT

RESPONSE

- I-160-1 You are added as a party of record.

- I-160-1 |



I-161

COMMENT

RESPONSE

I-161-1 See Common Response 13 Growth Targets. The growth target is 35,000 housing units and 70,000 jobs regardless of the Alternative studied.

Share Copy link Download

From: Plummer David F. <pdf@comcast.net>
 Sent on: Monday, June 12, 2023 4:09:59 AM
 To: CompPlan2044DEIS <CompPlan2044DEIS@bellevuewa.gov>
 CC: OneBellevue@googlegroups.com; Rebecca Maskin <rmaskin@kingcounty.gov>; Nese, Katherine <KNese@bellevuewa.gov>
 Subject: City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburson Vision Implementation Environmental Impact Statement

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

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

Hello Mr. Pittman!

During the 2022 meetings of the City's 2044 Strategy Teams, the Team members apparently cast their votes indicating their preference for a housing unit "target" to be considered for incorporation into the City's 2024 update of the City's comprehensive plan; the Team members were presented with 6 possible choices: 35,000 (13), 45,000 (6), 55,000 (4), 65,000 (2), 70,000 (4), and more than 70,000 (3); the number of "votes" for each value is given in the parenthesis following each value, as shown in the illustration illustration below. This information became known to the Bellevue staff about 20 September 2022 (reference "Meeting Notes, 2022.09.20.xlsx", accessed 10 June 2023).

Using a place-holder value of 75,000 for each of votes cast for a greater-than-70,000-value, the average of all 33 votes is about 50,000 housing units, far in excess of the King County specified value of 35,000 for the City's 2024 update of the Comprehensive Plan. In addition, in the City's 2024-2044 Comp. Plan update DEIS, the City has failed to identify the HU values for the (draft) 2024 Comp. Plan; further, the DEIS housing-unit target values for the 4 alternatives are not identified, though the predicted capacity values are very much higher than the Team-preferred value (ca 50,000) and the King County targets specified in the 2021 King County Countywide Planning Policies, Table DP-1; in addition, no rationale is provided for why Comp Plan changes have been postulated for the 3 "Action" alternatives that result in HU capacities far in excess of the King County specified targets given in Table DP-1.

Sincerely,

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

David F. Plummer
 David F. Plummer
 14414 NE 14th Place
 Bellevue, WA, 98007

Note: there are more sheets in this document

Session	Votes	Value
1	1	35,000
2	2	35,000
3	2	35,000
4	2	35,000
5	2	35,000
6	2	35,000
7	2	35,000
8	2	35,000
9	2	35,000
10	2	35,000
11	2	35,000
12	2	35,000
13	2	35,000
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36	2	35,000
37	2	35,000
38	2	35,000
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40	2	35,000
41	2	35,000
42	2	35,000

I-161-1

I-162

COMMENT

RESPONSE

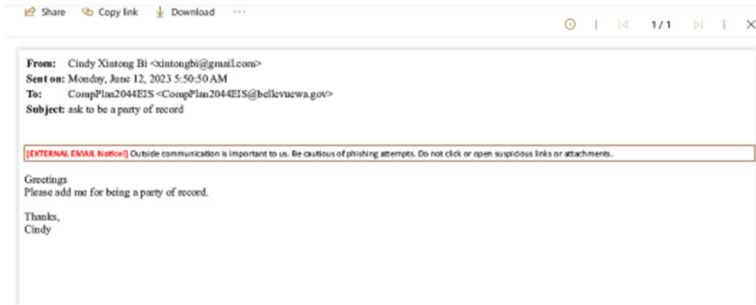
I-162-1	The DEIS is voluminous! I could not digest even a large portion of it. Especially because I waited until the final comment day.	I-162-1	Please note that DEIS Chapter 1, <i>Summary</i> , Section 1.7 Summary of Key Findings, Impacts, and Potential Mitigation Measures in the DEIS provides a high-level summary of the environmental evaluation of alternatives, mitigation measures, and overall findings in a tabular format.
I-162-6	I recognize that Bellevue is growing and will continue to grow, in residents and businesses of many sizes. This growth necessitates certainly more housing of many varieties, to accommodate residents who rent and those who already own or desire to own a home. New housing must enable people of ALL incomes to be able to afford to live in Bellevue. I urge the city to do everything you can to increase workforce housing (I guess this is the so-called "missing middle") and lower- to low-income housing. Bellevue should not be a city only for the wealthy, as it is rapidly becoming. I would not want to afford my 1954-era rambler at today's market price valuation, even if I could! I don't want to be house rich, income poor. That's no way to live for anyone.	I-162-2	Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis related to HB 1110.
I-162-7	What impact on the DEIS and 2044 planning does HB 1110 have? Seems that this new law does a lot of what Alternative 1 purports to do.	I-162-3	See Common Response 8 Air Quality/GHG.
I-162-3	It is paramount to me that Bellevue meet, even better, exceed greenhouse gas emission reduction targets!!! I favor ALL of the many and varied instruments and methods that further this goal.	I-162-4	See Common Response 2 Tree Canopy.
I-162-4	It is paramount to me that Bellevue retain the vast, vast majority of our existing trees. The tree code revisions are happening outside of the 2044 planning process. How is Bellevue going to enforce retention of not only existing significant and landmark trees, but also even existing smaller trees that TODAY contribute to GHG absorption, help prevent heat islands and other ill effects of global warming.	I-162-5	Please see Common Response 7 Parks and Open Space. Airfield Park is currently undergoing a master planning update effort led by Parks & Community staff. Airfield Park is proposed as a public recreation facility, not a residential development as noted by the commenter. The Airfield Park Master Plan Update is subject to SEPA and is a separate process, outside the scope of this EIS.
I-162-5	It is paramount to me that Bellevue NOT develop existing parkland, forest, and greenspace. This includes e.g. Airfield Park and the Coal Creek parcel that's now in limbo of becoming expensive condos instead of wildland enjoyed by hundreds of walkers. Do not forsake nature and natural areas for the \$\$ of development.	I-162-6	See Common Response 4 Housing Alternatives.
		I-162-7	Please see Common Response 4 Housing Alternatives, which describes the additional analysis related to HB 1110.

I-163

COMMENT

RESPONSE

I-163-1 You are added as a party of record.



I-163-1 |

I-164

COMMENT

RESPONSE

I-164-1 Grand Connection implementation is supported in policy in the Transportation Element and the Wilburton/NE 8th Street Subarea Plan. Separately, the city will be engaged in preparing a preliminary design for a new I-405 bridge exclusively for pedestrians and bicyclists.

I-164-2 The EIS includes a study of the extension of NE 6th Street across 405 to either 166th Street or 120th Street. See FEIS Chapter 11, *Transportation*, for more details on this.

I-164-1 | To ensure accessibility and equality for the general public, it is essential to prioritize the study and inclusion of the Grand Connection 405 bike or pedestrian over crossing in the Transportation section of the DEIS. This is crucial for cultural, economic, and social development, fostering tourism, promoting placemaking, and bridging the divide caused by I-405.

I-164-2 | There are key areas that require clarification. Firstly, in Section 11.5.1, it is important to specify if the Grand Connection I-405 non-motorized crossing between City Hall and Easttrail is assumed to be implemented in at least one of the Action Alternatives. Additionally, it should be clarified whether the Wilburton study area will be included in the system performance modeling.

I-164-2 | Secondly, it needs to be determined whether the I-405 non-motorized crossing will be considered as one of the eight new pedestrian and bicycle crossings over I-405 mentioned in that section. By addressing these points, we can ensure that the Grand Connection project is thoughtfully designed and integrated, benefiting the community at large.

I-165

COMMENT

RESPONSE

I-165-1 | For the concern about affordable housing, I share the sentiment that the supply of some housing should be designed with lower income populations in mind, but rather than simply basing eligibility on such housing strictly on low income levels, there should be strong preference for housing to those that are essential workers (healthcare, grocery, restaurant, teachers, police, fire, govt services).
I-165-2 | One of the things that I find problematic about Bellevue as a community is that all the critical jobs are done by people that travel from far to serve in those capacities. We should do a better job of taking care of those that help keep our city and critical services running, and there is no better way to show that support than through housing support. Thank you for considering.

I-165-1 See Common Response 4 Housing Alternatives.

I-165-2 See Common Response 4 Housing Alternatives.

I-166

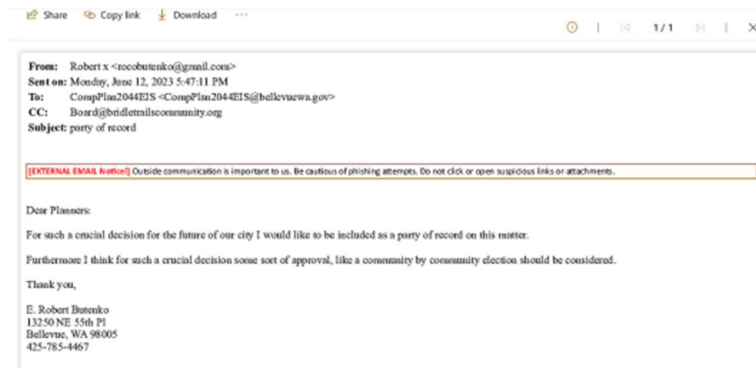
COMMENT

RESPONSE

I-166-1 You are added as a party of record.

I-166-2 Comment noted.

I-166-1 |
I-166-2 |

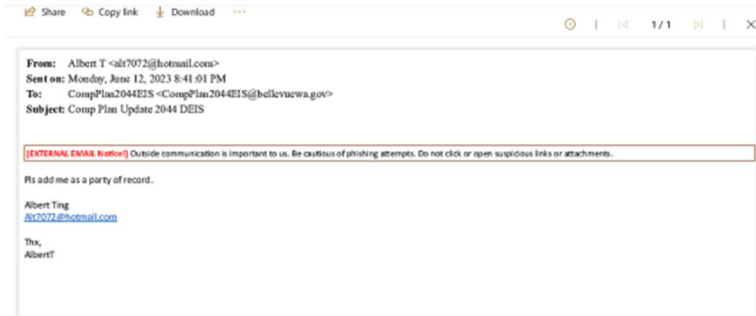


I-167

COMMENT

RESPONSE

I-167-1 You are added as a party of record.



I-167-1

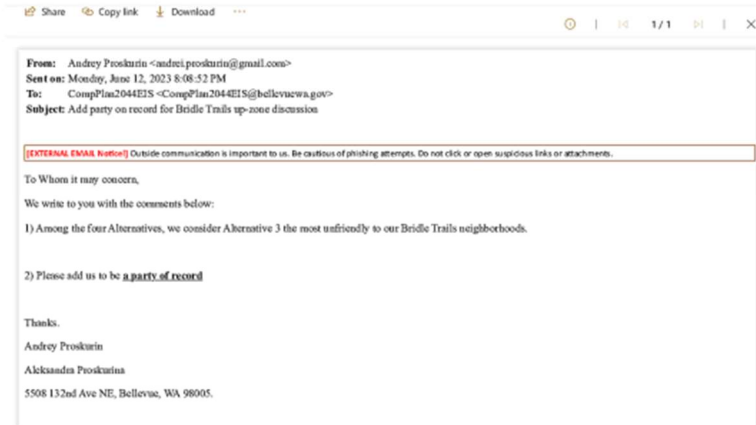
I-168

COMMENT

RESPONSE

I-168-1 You are added as a party of record.

I-168-2 Comment noted.



I-168-2

I-168-1

I-169

Please see attached PDF.

COMMENT

RESPONSE

I-169-1

The property identified was studied with an R-Suburban future land use category in the FEIS. This includes additional units allowed under HB 1110 and HB 1337. See Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on land use around that area. See Common Response 4 Housing Alternatives for more information regarding how the analysis of environmental impacts associated with city compliance with the requirements of HB 1110 and HB 1337, as well as potential mitigation for the identified impacts, is included in the FEIS.

June 12, 2023

VIA UPLOAD

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

RE: Support for high-density multifamily opportunities along NE 8th Street and Alternative 3

Dear Mr. Pittman:

The Edson family owns property located at 821 134th Avenue NE, Bellevue, parcel 067210-0081 ("Property"). Our family has resided in the City of Bellevue ("City") since 1962. We support Alternative 3 as the most viable option to address the City's housing needs, but ask the City to consider denser multifamily in certain Transit-Proximate Areas.

The Property is in a Transit-Proximate Area along the NE 8th Street corridor. Figure 2-1. **The Preferred Alternative should designate the Property Multifamily-Medium (MF-M) to allow for mixed-use, midrise multifamily development with the possibility for ground-floor commercial in the future.** The Property is currently designated "R-Low" in both Alternatives 2 and 3. Given the size and location of Property, this is a missed opportunity as described below.

The Property is within the Wilburton-NE 8th Subarea and is currently zoned R-2.5. It is currently designated SF-M in the Comprehensive Plan. It is adjacent to NE 8th Street between 132nd Avenue NE and 134th Avenue NE, across from Glendale Country Club and adjacent to a City park, shown below.



I-169-1

I-169

COMMENT

RESPONSE

I-169-2
 I-169-3

The Property is approximately 101,771 s.f. in size (2.34 acres) but developed with only a single dwelling unit. It is ideal for multifamily redevelopment given its size, proximity to transit, and adjacency to the City park. **The Property is underutilized and is better suited to further the City's goal to increase multifamily housing options.** Since the City's last comprehensive update, NE 8th Street has become a major transit corridor connecting east Bellevue to Downtown. The Rapid Ride now has stops on both sides of the street directly adjacent to the Property; it is an ideal location for transit-oriented multifamily housing.

The City has already zoned much of NE 8th Street for mid-rise multifamily. The Property is located in a "gap" of low-density zoning along the corridor, as shown below. The R-Low designation in this location is a missed opportunity. The Comprehensive Plan update should address this gap in density given the emergence of NE 8th Street as a major connection to Downtown.

The City faces a pressing housing affordability crisis. We support the City's goal to provide "missing middle" housing for our teachers, police officers, firefighters, young families, and others who constitute a critical part of our community. As the work to update the Comprehensive Plan proceeds, we are happy to provide more specific information about the Property as a potential site for multifamily development. Please do not hesitate to contact me with any questions you may have about the Property.

Sincerely,

Linda Edson
 Email: allegrofabrics@yahoo.com

I-169-2 Comment noted.
 I-169-3 See Common Response 4 Housing Alternatives.

I-170

COMMENT

RESPONSE

I-170-1
 I-170-2
 I-170-3

From: Ann Sutcliffe <ann_sutcliffe@yahoo.com>
 Sent on: Monday, June 12, 2023 8:26:01 PM
 To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
 Subject: Bellevue - Draft EIS comments

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

Hello,

I am submitting these comments for the draft EIS based on my review and discussions with various stakeholders. These additions to the FEIS will improve its scope and make it more flexible for the various policy discussions that will come as part of the Comp. Plan update.

- Enforcement of Alternative 3
- FEIS should explore the utilization of large plots surrounding transit stations as catalysts for neighborhood development, encompassing employment, housing, retail, and communal spaces. Large plots should serve as focal points for the community, while smaller plots are ideal for IHF housing.
- FEIS should include additional research on increasing density and allowing a range of uses (residential, commercial, retail, etc.) in the vicinity of Light Rail Stations, particularly in Bel-Red. Emphasize the importance of a wide range of uses to accommodate the many future directions growth may take.
- FEIS should investigate a reduced emphasis on car transportation near Light Rail Stations. Avoid expanding the street grid further and prioritize pedestrian and bicycle circulation.
- The FEIS should evaluate the impact of Critical Areas on housing density. Assess the negative effects of Critical Area and stream setbacks on potential housing density and quantify the findings.

Thank you,
 Ann

I-170-1 Comment noted.
 I-170-2 All alternatives include density and transit oriented development around light rail stations (with the exception of the South Bellevue station area where wetlands/park and steep slopes constrain development potential).
 I-170-3 See Common Response 16 Critical Areas.

I-171

COMMENT

RESPONSE

I-171-1 The comment expresses concern that the DEIS does not address potential noise impacts from rooftop helicopter pads. The growth alternatives discussed in DEIS Chapter 2, *Alternatives*, consider alternatives that include a range of capacities to accommodate housing and job growth, housing types, and investments in infrastructure citywide and in the Wilburton study area. None of the alternatives considered mention or would reasonably be expected to include helicopter pads, and private helicopter pads are not permitted in Bellevue in connection with new development. Any proposal of a new helicopter pad, which are generally associated with emergency medical facilities, would have to be approved by the Federal Aviation Administration (FAA) and would include an assessment of noise impacts from operation as part of addressing the projects impacts under the National Environmental Protection Act.

I-171-2 Please see Common Response 7 Parks and Open Space.

I-171-1 |
I-171-2 |



I-172

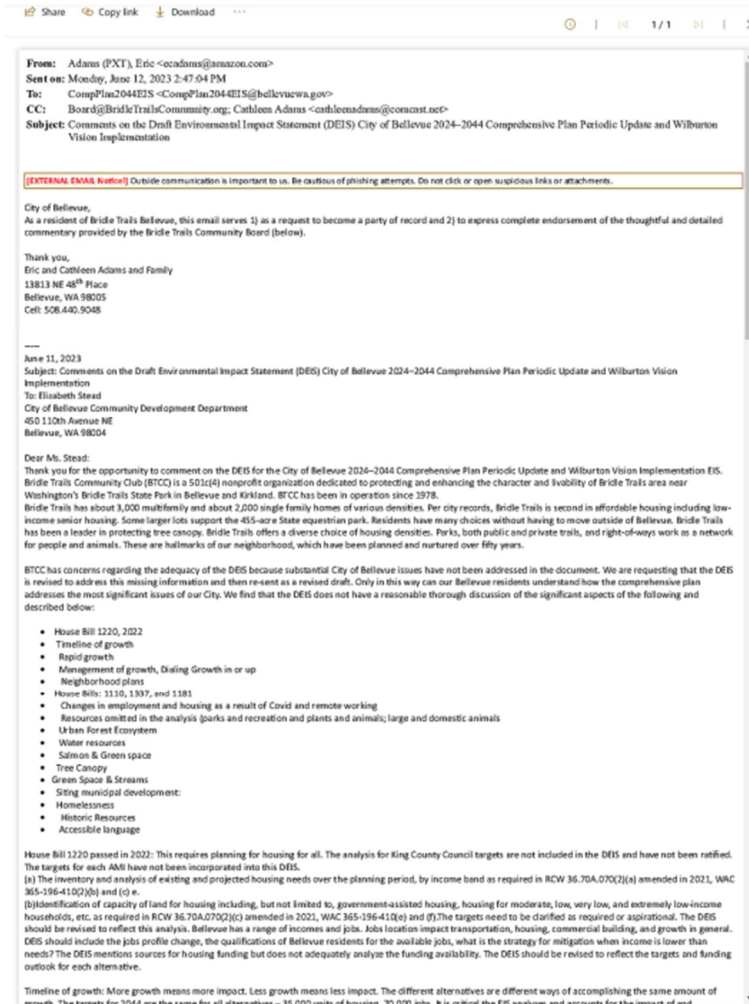
COMMENT

RESPONSE

I-172-1 You are added as a party of record.

I-172-2 Comment noted.

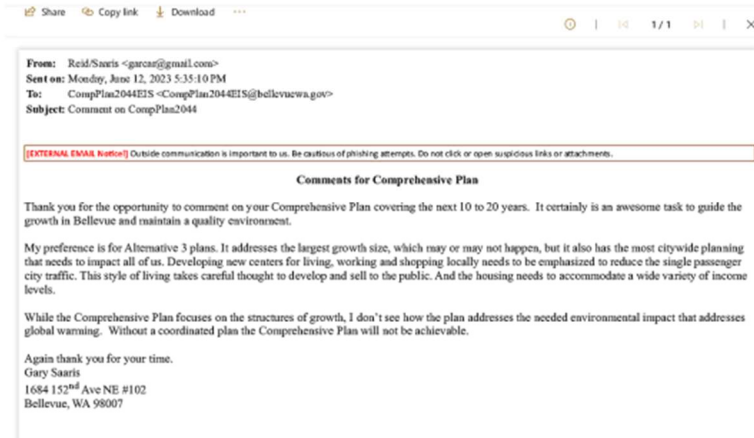
I-172-1
I-172-2



I-173

COMMENT

RESPONSE



I-173-1 See Common Response 4 Housing Alternatives.

I-173-2 See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.

I-173-1

I-173-2

I-174

COMMENT

RESPONSE

I-174-1 IMHO, sending 1000 pages document to get public opinion is not a good idea. Along with the comprehensive plan it would be better to send high level summary. Lots of folks would not have time to go over the big document.

I-174-1 DEIS Chapter 1, *Summary*, Section 1.7, Summary of Key Findings, Impacts, and Potential Mitigation Measures in the DEIS provides a high-level summary of the environmental evaluation of alternatives, mitigation measures, and overall findings in a tabular format.

I-175		COMMENT	RESPONSE
		(Comment on City of Bellevue Comprehensive Plan 2044)	
I-175-1		My name is Pinda Bazley, 13615 NE 48th Pl, Bellevue 98005 in the Bridle Trails Neighborhood. I also want to be a "party of record".	I-175-1 You are added as a party of record. I-175-2 Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis related to HB 1110.
I-175-2 I-175-3 I-175-4		1. I am concerned that the DEIS does not consider the impact of the recently passed House Bill 1110. The impact of this is not yet known as it has only just been passed into law. More time is now needed for the City to assess the impact of HB 1110 in DEIS Alternatives 0-3. As the DEIS is written today, alternative 0 will need to be completely rewritten. A new DEIS is needed so residents can review and comment on the current reality, rather than how things used to be.	I-175-3 Comment noted. I-175-4 The DEIS analyzed the three Action Alternatives against the baseline assumptions in the No Action Alternative. As described in DEIS Chapter 2, <i>Alternatives</i> , the No Action Alternatives assumes continuation of the current Comprehensive Plan, while the three Action Alternatives are based on variations of housing and job capacities, distribution throughout the city, and implementation of new policies. The FEIS includes analysis of a Preferred Alternative.
I-175-5		2. I am concerned that the DEIS does not fully consider the impact of the Covid Pandemic on work patterns and locations. Many tech staff left their offices to work from home. Some have now returned to their offices part time, yet others remain working from home and yet others have moved out of the city to Eastern Washington. We do not currently know what the future of remote versus office work will be and do not know how many offices and homes will be needed in Bellevue.	I-175-5 See Common Response 11 Impact of COVID-19.
I-175-6		3. The City proposes to update the Tree Code this year. Bridle Trails already has a stronger tree code, yet significant/landmark trees are cut down (sometimes on a weekend) as houses are torn down and rebuilt on larger footprints. The DEIS needs to be rewritten to consider the updated Tree Code. I am especially concerned about how the removal of large trees will impact the wildlife in Bridle Trails. I live a 5 minute walk from the Bridle Trails State Park and have seen deer, bobcats, bear, barred owls, bald eagles, coyotes, raccoons and numerous other birds in my yard and using the trails surrounding my yard.	I-175-6 See Common Response 2 Tree Canopy. I-175-7 Common Response 2, Tree Canopy. See Common Response 9 Plants and Animals.
I-175-7		I am aware of cougar sightings in the State Park. I have also heard the park ranger say that the State Park is a perfectly balanced ecosystem. Does the DEIS rigorously address what will happen to the wildlife and trees when you permit greater development in Bridle Trails? Bridle Trails is currently considered a rural neighborhood by the City. Where will the wildlife go when you cut down their homes? Have you studies the impact of noise on wildlife? The DEIS needs to be rewritten to rigorously consider the impact on the State Park and entirety of Bridle Trails.	

I-176

COMMENT

RESPONSE

Input Draft EIS Bellevue Comprehensive Plan

From 13-year residents of Bellevue with two kids who went to Bellevue Schools, and a multi-generation history in King County.

Summary

The draft EIS and the draft Bellevue Comprehensive Plan 2044 "land uses" fail to make good use of opportunities to plan for growth and will result in a city with massive inequality, harmful health impacts to new residents, and inequitable destruction of our most environmentally friendly and affordable housing.

The land use map needs to be redrawn to:

- a) Avoid displacement of middle and lower income residents,
- b) Provide child and family-friendly backyard green space for multi-family residences,
- c) Avoid noise impacts,
- d) Stop the destruction of our existing environmentally friendly multi family housing.

The proposals to increase Bellevue's growth need to be revised because they wrongly focus on redeveloping existing apartments and condos - the city's most green and affordable housing. This would be destroyed and take many years to rebuild. The rebuilds will not be family-friendly and healthy if recent development is any example.



Bellevue's Woodland Commons

[Draft EIS Higher growth alternatives rely on sacrificing our more affordable and eco-friendly housing](#)

The reasons for draft EIS alternatives 2 and 3 are at best incomplete, and at worst are based on false justification. It is critical to address a false rationale for tearing down existing dense apartments. This rationale appears to be to build even higher density near transit. However, this logic falls apart when we examine closely how much more land Bellevue has near transit that is *not* proposed for rezone/upzone.

- I-176-1 The Preferred Alternative studied in the FEIS kept most of the residential areas of the city with the same future land use. In addition, in the Crossroads Mixed Use Center, existing middle density areas where naturally occurring affordable housing had been identified in the Housing Needs Assessment retained the same future land use. This was specifically to address displacement risks for middle- and lower-income residents. Specific regulations related to the development, redevelopment or preservation of multifamily housing (or any type of development) is beyond the scope of the EIS. However, the city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review.
- I-176-2 See Common Response 4 Housing Alternatives.
- I-176-3 None of the alternatives include any specific proposals for development or redevelopment. All alternatives assume an average level of growth under a build out scenario across the city. The specific development on any particular site is beyond the scope of the EIS. However, the city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 4 Housing Alternatives for more information on how housing capacity was analyzed in the EIS.

I-176

COMMENT

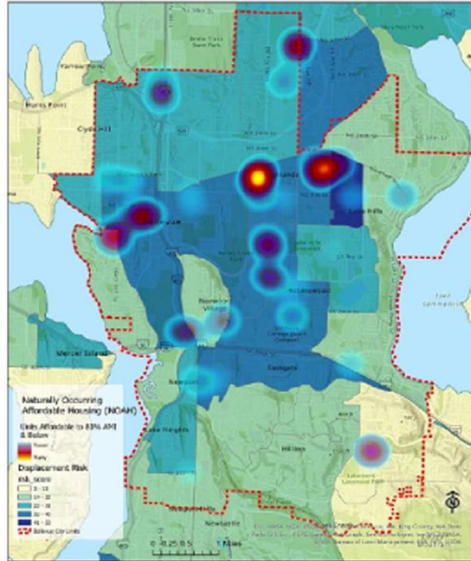
RESPONSE

I-176-4 The commenter is referring to DEIS Chapter 7, *Housing*, Figure 7-10, Naturally Occurring Affordable Housing (NOAH) and Displacement Risk, Citywide on page 7-22. This shows the current displacement risk and current locations of NOAH. In the Preferred Alternative studied in the FEIS, higher density areas of the city containing predominantly multifamily housing outside of Mixed-Use Centers retained the same future land use designation. The area in Crossroads Mixed Use Center with the highest risk of displacement also retained the same future land use designation in much of the area.

I-176-4

The real reason for a focus on tear-down and rebuild of existing multi-family appears to be political assumptions that: renters won't be as opposed or powerful; and a prejudice for a few home owners. The EIS does not even consider the true pros and cons. The alternatives, especially Alternatives 2 and 3 prioritize the wishes of the few large lot homeowners over the needs of the many. This is the kind of historical inequity that we want to stop because it makes poor outcomes for families and hurts us all.

The EIS contains a map showing the most affordable housing in Bellevue right now is our existing low-rise apartments. **Draft EIS page 334 of 1094 shows existing affordable housing and displacement risk:**



SOURCE: CDOT 2022; HUD CHAS Income LMI#1 2022; FERC Displacement Risk Index, Data collected from American Community Survey (ACS), U.S. Census Bureau; Consolidated Housing Affordability Strategy (CHAS), U.S. Department of Housing & Urban Development (HUD); Google; County elections data, 2011 to 2018, CA 2022.

FIGURE 7-10 Naturally Occurring Affordable Housing (NOAH) and Displacement Risk, Citywide

I-176-5 See Common Response 4 Housing Alternatives.

I-176-5

The EIS Alternatives propose to displace all the people in the existing affordable areas by rezoning for higher density in only those limited areas. This is proposed

I-176

COMMENT

RESPONSE

I-176-5

even for apartments *not* located near transit. The common attribute for significant land use changes in the EIS Alternatives is that they are existing multi-family apartments or in some cases condos.

If we are densifying based on of transit-proximity, we would densify single family blocks along the entire train and "rapid ride" bus route, but that is not what the alternative land use maps propose.

This is the definition of inequity and systemic bias. We plan to take existing affordable family-friendly areas populated by renters and affordable to those with medium income, and displace all of those people. In contrast, we won't rezone existing houses on very expensive large lots.

The draft EIS is wrong when it indicates displacement is the same under Alternatives 2 or 3 as under alternative 1. Alternative 1 clearly will result in less displacement because much of the existing dense residential would not be re-developed under Alternative 1. **Why are we choosing from alternatives that will tear down pretty much all of our affordable housing? Why don't we put more residential in a few other locations?** Any Land Use Plans that encourage replacement of existing multi-family mean the city of Bellevue is proposing to destroy its best middle and lower income housing.

Most of these medium-density multi-family residential areas currently have green space and the proven health benefits that come with green space. These apartments also typically have environmentally-friendly electric heat. Keeping these apartments rather than tearing them down uses fewer resources.

A small selection of photos of Bellevue's existing gems of dense, family friendly housing that we can keep and improve, not destroy:



Hidden Creek:

I-176

COMMENT

RESPONSE



**Foothill Commons:
Sandpiper East:**



I-176

COMMENT

RESPONSE

I-176-6 See Common Response 4 Housing Alternatives for how the EIS addresses the requirements of recent legislation, including but not limited to analysis of environmental impacts associated with city compliance with the recently-adopted requirements in the Growth Management Act.

CityScape Bellevue:



Washington State’s new Missing Middle Housing Statute

It is important to address that state law recently changed to require the city to allow single family large lots to be developed into multiple units. That may address some of the concerns of density, but it is insufficient if the city also adopts a plan that upzones any of our existing more dense low-rise and garden-style apartments and condos. Those existing medium density multi-family units are our existing “missing” middle!

The state Missing Middle Housing bill does not address the problems of Bellevue’s proposed growth plans because the EIS Alternatives propose to redevelop existing medium density residential or existing apartments and to higher density residential. In contrast, single family lots near transit are not being upzoned.

The City revealed real maps of proposed land use changes for the first time only in the last month, when it released the Draft EIS. Money has already been spent on the EIS and alternatives. Despite these sunk costs, we must go back and consider vastly revised land use maps and re-do the environmental evaluation of alternatives.

Until the detailed land use maps very recently released with the EIS, we did not have enough detail to give reasonable input. Many residents said there should be more housing and that they don’t like how existing single-family homes are being torn down and replaced with 4000+ square foot mansions. Why don’t we see more to address those issues?

Page 5 of 11

I-176-6

I-176

COMMENT

RESPONSE

I-176-7 Comment noted. See Common Response 14 Equity and Environmental Sustainability Metrics.

I-176-7

The magazine *The Atlantic* recently encapsulated the problem of planning bias in an article where they wrote about planners making assumptions that don't disturb upper echelon socio-economic populations because they don't want to deal with the pushback. Therefore, they don't even give all the options to decision-makers. This is systemic bias at work, and we must not allow it to be part of our decisions.

I-176-8 See Common Response 4 Housing Alternatives. See Common Response 7 Parks and Open Space.

I-176-8

Our Schools and City's Future.

Bellevue has such limited single-family housing compared to the number of very high paying jobs that we are a city of extremes – we have either very high density or very low-density housing. This is a big reason for declining school enrollment. We want our schools to be full because we have excellent schools and we are geographically positioned near many jobs.

However, our high-density apartments have relatively few school students and our sprawling single-family residences, most worth \$2 million or more, also have very few students. This is for opposite reasons. One is that families prefer green space immediately available for their kids, selves, and guests to enjoy - like a backyard. High density as we have been building it does not have this green space. The other reason is that people who have the money for the single-family homes that most kids and parents prefer are not affordable to young people with young kids. (People need to work their way up in their career and save for a while and so they move to the far suburbs.) **How many more Bellevue elementary schools will close if we don't create family friendly housing? Densifying existing family friendly apartments will make the situation worse.**

I-176

COMMENT

RESPONSE

I-176-9 See DEIS Chapter 10, *Public Services and Utilities*, for information on school capacity.

I-176-10 See Common Response 4 Housing Affordability. See Common Response 7 Parks and Open Space.

The few single-family residences that contain people who might fight against rebuilding part of their neighborhood as denser housing will learn that their fight boomerangs against them. It will hurt neighborhoods as our neighborhood schools close. It's not as nice of a neighborhood if your kids can no longer walk to school. *From recent news coverage of Bellevue's school closures:*

Concerned parents, students and staff have rallied over the past few weeks after learning seven elementary schools would be considered for a three-school consolidation plan due to declining enrollment, according to the BSD.

The seven elementary schools being considered are Ardmore, Eastgate, Enatal, Phantom Lake, Sherwood Forest, Woodridge and Wilburton.

The BSD said these seven schools have the lowest enrollment and are not forecasted to improve in those numbers in the near future.

The declining enrollment in the district is impacting student programming, financial stability and facility usage. According to the district, they are currently only utilizing 66% of space in classrooms and other facilities.

KING 5 attended a few of the district listening sessions and spoke to parents from several schools on the list for potential consolidation.

Many parents say they are frustrated by the speed at which the process to consolidate schools is happening. Several parents who have reached out to KING 5 said they moved to Bellevue specifically to send their kids to "neighborhood schools."

"We bought our house because it had a neighborhood school that our kids could walk to that they could have playdates with kids that were just down the street and where they're talking about sending our kids is not... not super close," said Nicole Holley, an Eastgate Elementary parent.

Source: <https://www.king5.com/article/news/education/bellevue-families-rally-school-consolidation-announcement/281-10790900-e923-4d1a-b90f-7096dcbc856a>

Improve, don't remove, existing medium density housing

Our existing medium-density apartments are 20 to 30 per acre with a balance of green space and can be made even more attractive to families. Not every apartment that has green space has made it a nice place for kids or gathering with friends. Many apartments need a little bit of a change in the outdoor spaces to add play equipment or picnic tables, shrubs and greenery that break up the space that make people feel like they have both privacy and gathering spaces. The city should focus on this assistance, not on preserving existing large-lot housing that doesn't serve families or growth or the environment well.

I-176-9

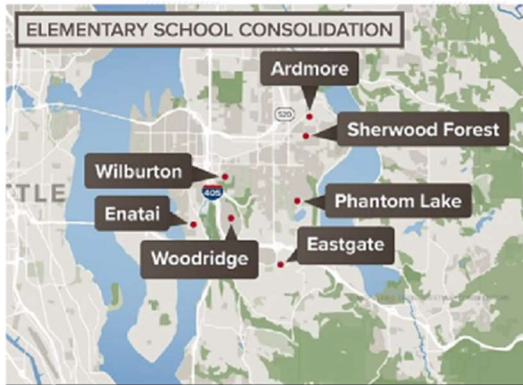
I-176-10

I-176

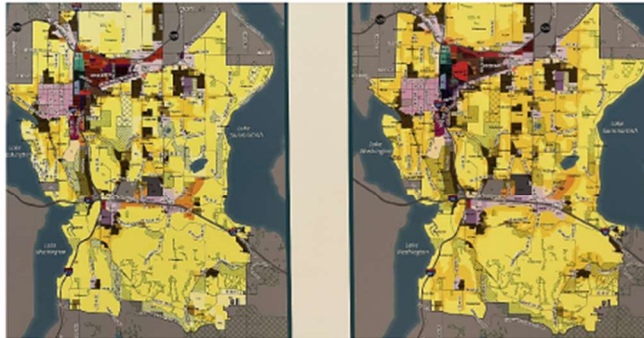
COMMENT

RESPONSE

I-176-11 Comment noted.



Compare the above school map to Options 2 and 3 in the Comprehensive Plan Draft EIS:



The “tear-down-to-densify-already-dense-residential” draft EIS options were settled on before the elementary school consolidation issue with the school district was made public. It’s time to go back to the drawing board.

I-176-11

I-176

COMMENT

RESPONSE

Noise.

Residential areas have a strong preference for peace and quiet. It is extremely important to have a low level of noise in your home, which is why many people like their homes set away from busy multi-lane roads. Apartment-dwellers are people, families, and human beings no different from homeowners in terms of their need for green space and low levels of noise.

A recent *New York Times* article pulled together the scientifically measured negative impacts of noise on health, showing how noise can take years off people's lives.

"Noise Could Take Years Off Your Life. Here's How. We used a professional sound meter to measure the din of daily life and talked to scientists about the health risks it can pose." By Emily Baumgaertner, Jason Kao, Eleanor Lutz, Josephine Sedgwick, Rumsey Taylor, Noah Throop and Josh Williams June 9, 2023.

The Bellevue plan options Alternative 2 and 3 that would put extremely high density next to busy streets and train stations only subjects all those residents to the kind of noise that will hurt their health or that they will move away from.

Noise-proofing buildings doesn't help much if outdoor spaces are very noisy, because, as alluded to above, we get a lot of health benefits from being outside in green spaces.

Green Spaces Attached to Each Residential Development

If higher density is going to help our region and its broader housing goals, the alternatives in Bellevue's comprehensive plan draft that achieve density by tearing down existing multi-family of 20 or 30 units per acre to replace it with large buildings with minimal attached green space are doing it in one of the worst ways possible. We won't get the results that we want. We won't see families walking and healthier kids. We'll see kids inside all day with screens because there's no safe green space for them to go and even if they do go out it's too noisy to enjoy. Or, families will move out to distant suburbs and have hours-long commutes that both hurt the environment and family time.

We need to look closely at green space requirements. In recently built multi-family apartment blocks in Bellevue, green space requirements result in landscaping at the front near the street. This looks nice but is not usable for families. We are also losing trees when we need them most to counter excessive heat and air pollution.

Instead of back yards (yes, apartments can have back yards), many new Bellevue residents are limited to parks that require them to walk or drive. When we see kids at a park without their parents, it can be a cause for concern. But parents have a lot to do. Why can't they work in the house and look at their kids through the window in the yard? Most people with jobs don't have the option to spend a couple of hours driving kids to park and watching their kids every day so that their kids can be outside. (What was it like for you when you grew up? Did your mom or dad spend

I-176-12 DEIS Chapter 9, *Noise*, Page 9-11 addresses exposure of new residential uses to excessive traffic noise levels. Specifically, Action Alternatives could result in new residential uses proximate to freeways or other high-volume roadways that generate the relatively high noise levels indicated in Table 9-3 at a distance of 150 feet. Given that the Noise Abatement Criteria (NAC) for residential uses is an exterior value of 67 dBA, such noise exposure in excess of this NAC was calculated for each of the highway segments analyzed, and the distance required to avoid exposure in excess of the NAC is presented in Table 9 4. These distances are conservative in that they do not account for intervening structures or topography that would attenuate traffic noise. As stated on page 9-16 of the DEIS, under Alternative 2, development of new noise-sensitive uses in proximity to freeways could expose people to noise levels in excess of the 67 dBA residential NAC. See Common Response 6 Noise for the existing regulations around noise for residential buildings.

I-176-13 Please see Common Response 2 Tree Canopy.

I-176-14 See Common Response 7 Parks and Open Space.

I-176-12

I-176-13

I-176-14

I-176

COMMENT

RESPONSE

I-176-14 | your outdoor time with you or did they let you go in the backyard while they were busy in the house?)

I-176-15 | A much better solution is to keep **all** of our existing low-rise apartments, which are extremely dense and have many transit riders. Then, carefully allow higher density on a smaller number of single family and commercial or undeveloped areas. Make sure this higher density is done with access to green space for everyone who lives there so that families don't move away.

I-176-16 | Bellevue should create incentives to improve the family friendly aspects of existing apartments.

I-176-17 | **Displacement not adequately analyzed**
The draft EIS does not clearly include the numbers of residents that would be displaced if the existing apartments were torn down nor the number of school children that would be impacted. Mitigation suggestions like assistance moving do not account for figuring out where else in Bellevue people could move to?

I-176-18 | The draft EIS does not count the number of residents in single family areas that are near high capacity transit and are not proposed for any land use change in. Without this data it is impossible to get a clear picture of the impact on existing Bellevue residents.

I-176-19 | The current displacement mitigation plan in the EIS is laughable. The possible "right to return" for existing multifamily is a false option. Anyone evicted from their existing Bellevue multi-family is not going to wait many years to return, especially to a drastically different more crowded building. Their life will change during the years they must wait, and their kids will grow up.

I-176-20 | **Transit and Parking**
Our family takes the bus frequently. The "rapid ride" that serves many existing apartments has a lot of ridership. We don't need to tear down our existing apartments. We need to replicate them and search hard for areas where it makes sense to do so.

I-176-21 | Multi-lane roads and parking lots are destructive to the benefits of walkable, attractive cities and our wildlife and health. But removing parking to force transit use ignores the huge life, opportunity, and happiness impacts on people who are forced out of having a car.

I-176-22 | See this excellent article on the real world experience of such development in another, more transit-oriented city: <https://missionlocal.org/2023/05/no-parking-at-mission-affordable-housing-means-tenants-pay-the-price/>. As quoted in the article, a problem with lack of parking is, "it's hard to shuffle her kids to school on the bus. Policies meant to disincentivize cars are 'elitist,' she said. 'Rich people still keep their cars.'"

I-176-23 | Services are spread out across land uses. Can people get their child to activities? Can people have friends come to visit on weekends or evenings, or does a lack of

I-176-15 | The Preferred Alternative retained existing future land use designations in many multi-family areas to encourage the retention of existing multifamily housing. In the Crossroads area, naturally occurring affordable housing was identified and that area had the highest risk of displacement (see DEIS Chapter 7, *Housing*, Figure 7-10). Therefore, this area was a focus of retaining existing future land use designations.

I-176-16 | Comment noted.

I-176-17 | See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

I-176-18 | DEIS Chapter 7, *Housing*, Table 7-4 shows the number of units close to transit separated into single-family and multi-family housing styles. There are very few single-family units close to high capacity transit.

I-176-19 | Comment noted.

I-176-20 | Comment noted.

I-176-21 | Comment noted.

I-176-22 | Comment noted.

I-176-23 | See FEIS Chapter 11, *Transportation*, for information on potential mitigation measures.

I-176

COMMENT

RESPONSE

I-176-23 |

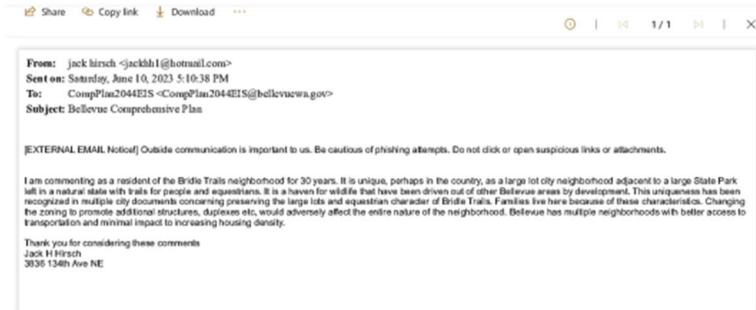
parking prevent this? We need to first improve our transit networks first so that people voluntarily give up cars.

I-177

COMMENT

RESPONSE

I-177-1 See Common Response 4 Housing Alternatives.



I-177-1

I-178

COMMENT

RESPONSE

I-178-1 Comment noted.

I-178-1

Bellevue is a forward thinking city, with growth in business, education, parks and shorelines, and many new workers. I am concerned with the new Mid Rise structures and volume of people that it will change the culture of the Old Bellevue, as the small town it was. Over-expanding may be good for the City's mitigation fees, tax bases, but please don't forget the growth can erode the very thing we love about this City. Increasing values of property, taxes, and rent both residential and business need to be considered as we add to this rapid pace of growth. Please be aware of how much growth is needed, unless that is your intention. Dale Hutson

I-179

COMMENT

RESPONSE

I am an Owner's Representative for a condo in the 9 Lake Bellevue building, which is next to the new Wilburton Light Rail Station. The opportunity to comment on Bellevue's Wilburton Vision Plan is much appreciated.

I-179-1 See Common Response 9 Plants and Animals.

I-179-1 Lake Bellevue is a greenery and wildlife oasis in the middle of high-density development and the I-405 freeway. In the 15 years our company has been in the building, we have seen several bird species, fish, ducks and geese, squirrels, and once even otter pups! By contrast, to the north there is the dense Spring District; West is I-405 and downtown Bellevue; East culminates in the Overlake and Crossroads areas, and south are Bellevue's 'Auto Row' and ongoing retail/office infill.

I-179-2 The Preferred Alternative studied in the FEIS included the area around Lake Bellevue with a future land use character of RC-M (Residential/Commercial-Medium). See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.

I-179-2

I-179-3 See Common Response 7 Parks and Open Space.

I-179-3 We believe that the City of Bellevue's Wilburton Vision Plan options have rightfully left the immediate Lake Bellevue area unchanged, and that it should remain that way. The Lake has much in common with the beautiful Bellevue Downtown Park; while the lake is privately owned, it is a green, peaceful respite from the high-rises, highways and hurry in Bellevue. It provides a restful and quiet space, and we believe it is an essential part of what makes the city so desirable a place to live and work. There are ample opportunities for high-rise and other development areas in Bellevue without changing Lake Bellevue.

Thank you again for the opportunity to comment!

I-180	COMMENT	RESPONSE
	<p>Thank you for the work on the Comprehensive Plan and the DEIS, and thank you for the opportunity to comment.</p>	<p>I-180-1 See Common Response 12 Impacts of Climate Change.</p>
I-180-1	<p>In general, I would like the DEIS to look at climate considerations as deeply and carefully as possible. The more we reduce our emissions, the more we will reduce the likelihood of climate impacts such as droughts, wildfire smoke, and extreme weather events. Because we cannot completely escape these impacts, we must also be prepared for them, and put a special emphasis on equity so that the impacts do not land most heavily on those least able to deal with them.</p>	<p>See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.</p>
	<p>Alternative 3 appears to be the most climate friendly option because: * It does a better job of building in the basic concepts of Transit-Oriented Development. It places high density growth not just downtown, but also around "Mixed-Use Areas," placing residential and commercial density around major transit stops. This makes it easier for more people to reduce their car trips. * It also points to distributed locations for small convenience commercial developments, aiming for more walkable neighborhoods and the reduced use of cars.</p>	<p>I-180-2 See Common Response 2 Tree Canopy. See Common Response 8 Air Quality/GHG.</p>
I-180-2	<p>* It allows for more types of lower cost housing options distributed broadly across the city. This means that more people who work in Bellevue could live in Bellevue, which would reduce long distance commuting.</p>	<p>I-180-3 See Common Response 8 Air Quality/GHG. Policies to address the causes and impacts of climate change are guided by the Comprehensive Plan and the Environmental Stewardship Plan. See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.</p>
	<p>However, Alternative 3 does not include an explanation of how essential city goals can be met in parallel with each other, specifically, reducing greenhouse gas emissions by 50% by 2030, increasing our tree canopy to 40%, and maintaining our excellent quality of life. A summary explanation needs to be included.</p>	
I-180-3	<p>Along with describing how new growth will be shaped, the Comprehensive Plan should describe steps for improving existing infrastructure, specifically, incentivizing energy retrofits to deeply reduce the carbon footprint of existing buildings, and developing zero emissions transportation alternatives.</p>	
	<p>Growth must not come at the expense of missing our target of a 50% reduction in GHG emissions by 2030. We must move as quickly as possible to standards where all growth (new buildings, redevelopment, transportation, and other infrastructure, plus operations) meets ultra-low GHG emissions standards. Some of those standards include:</p>	

I-180

COMMENT

RESPONSE

I-180-5	* All-electric buildings * Performance standards such as LEED Platinum certification or better * Well-placed and well-distributed EV charging stations	I-180-4	The alternatives were evaluated against standards identified in the Mobility Implementation Plan. The Mobility Implementation Plan provides the vision for a complete and connected network for pedestrians and bicyclists throughout the city. Projects are implemented as funding is available and as new private development builds a portion of the system.
I-180-4	* High standards for safe biking and walking options in every part of the city (interconnected networks of trails)		
I-180-6	* Any steps the city can take to press for our utility company to modulate peak electricity loads, for example, through variable rate schedules and "Demand Response." This can help shift activities such as car-charging to low-demand times of the day.	I-180-5	Building and energy codes, and project-specific development standards, are outside the scope of the FEIS. However, the Comprehensive Plan may include policy guidance that informs the city's adoption of codes, standards, and regulations. The policy guidance in the Comprehensive Plan may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS. Bellevue's Environmental Stewardship Plan, establishes targets, and articulates strategies for achieving those targets, related to decarbonization, building electrification, green building performance standards, and electric vehicles, among other sustainability topics.
I-180-7	We must require mitigation of heat island and runoff impacts for Mixed Use Areas, large square footage developments (commercial or public), and other high-density development. These mitigations can include highly reflective or green planted roofs, rainwater detention to slow stormwater runoff, rainwater capture for use in irrigation, plenty of shade tree planting, pavement minimization, pervious pavement where pavement is allowed, and use of underground or multi story parking structures to minimize paved land. Trees are an essential element in cooling our city, so we need to require minimum tree canopy for new development and redevelopment, and we must protect, in perpetuity, the current remaining trees and forested areas within the City.	I-180-6	See DEIS Chapter 10, <i>Public Services and Utilities</i> , for impacts on electrical service and potential mitigation strategies.
I-180-8	Developers should have to show that they've designed their buildings to keep the best (largest, oldest) trees on the property, and they should be required to replant and maintain trees to bring every lot up to a minimum tree canopy goal.	I-180-7	See Common Response 12 Impacts of Climate Change.
I-180-9	The plan needs to identify locations for new parks, protected forests, and beaches. Zoning regulations should ensure that we are setting areas aside for these uses and keeping our existing parklands and open spaces as green space.	I-180-8	See Common Response 2 Tree Canopy.
I-180-10	The plan should include strong mitigations for transportation, to reduce GHG emissions, traffic congestion, and the health impacts of fossil-fuel engine exhaust. For example, Bellevue should look at major investment in intercity mass transit along with disincentives to drive gas cars in Bellevue. Bellevue can also work with large businesses to reduce transportation impacts through high parking fees/taxes or parking restrictions based on license plate numbers (odd or even days), and can incentivize businesses to allow remote work and subsidize public transit passes.	I-180-9	Please see Common Response 7 Parks and Open Space.
I-180-11		I-180-10	See Common Response 12 Impacts of Climate Change.
		I-180-11	See FEIS Chapter 11, <i>Transportation</i> , for potential mitigation measures to reduce the impact of policies and land use studied.

Thank you again for your work on collecting comments and improving the Comprehensive Plan and EIS.

I-181

COMMENT

RESPONSE

I bought my home in 1972. The last 50 years have been nothing but change ~ some good, some bad.

I-181-1 See Common Response 2 Tree Canopy.

I live at 1844 140th Ave SE in College Hill. It's a small group of houses built over the last 75+ years.

A couple of years ago, the Cook property sold to a developer. The city allowed 6 houses with 5' setbacks and removal of nearly all the old trees. The most hideous loss was a glorious old pine with lovely 6" needles whose branches had been shaped by hundreds of delivery trucks passing under it for over 75 years.

I-181-1

When I heard the city was not allowing the removal of "specimen trees", I thought this wonderful old tree was safe. I was wrong.

The removal of that true "specimen" tree confirmed my suspicion that the City of Bellevue just doesn't care. They don't care about trees. They don't care of about the destruction of neighborhoods. They don't care about us. They only care about developers.

I-181-2 Comment noted. See Common Response 4 Housing Alternatives.

All six of those \$3M+ houses are ugly which is not the beef I have with them. Where was the city in the design development phase? Where was the city in allowing these 3000+sf homes to fully fill the property? It is astonishing to me that a person buys a \$3M+ home without the classic backyard for children to play in. Their backyard is a 5' setback does not qualifies as a "yard".

I-181-2

Yesterday, I was running an errand. In passing the group of homes, I noticed one of the home owners had put a pair of folding "Slow! Children at Play" signs in the street. My first thought was "mmmm, you spent \$3M on this house and your children need to play in the street? And, in addition to your mortgage, you need to shell out an additional \$50 for a pair of double faced signs."

What I wish we had in City Hall is a group of people who put residents first. It is clear, City Hall is supporting these builders to the detriment of our quality of life and the health of our neighborhoods. Taking a spin through Lake Hills and seeing home after home being demolished to make way for builder burgers is discouraging. The scale of these houses is ruining Lake Hills. As homes get demolished and old trees are felled, we lose a lot of the feeling we used to

I-181

COMMENT

RESPONSE

have living in Bellevue.

I-181-3 See Common Response 2 Tree Canopy.

Seeing the “native trees area” set aside on the Kamber Road side of the Cook development is a complete joke. As a woman who actually has trees worth saving, seeing these pathetic “native tree” examples is beyond discouraging.

I-181-3

And, to drag in Climate Change into the discussion: we are experiencing hotter and hotter summers here. The thing I’ve really appreciated about my property is how cool the trees have kept my home. Yes, I don’t qualify for solar panels (which I would do in an instant) because of the old trees shading my home and land, but during the heatwaves of the last couple of years, my home and property was 20+ degrees cooler than areas with fewer trees. I can feel the temperature difference just driving into my driveway.

I-181-4 Comment noted.

I-181-4

So this is my letter about the City of Bellevue Comprehensive Plan. I expect no help from City Hall. When I see how you all have turned your back on Lake Hills, I assume Wilburton is doomed, as well.

Just for fun ~ try putting us all first. Just a thought.

I-182

COMMENT

RESPONSE

I-182-1 See Common Response 2 Tree Canopy.

I-182-1



I-183

COMMENT

RESPONSE

I-183-1

I endorse the comments below by Barbara Braun.
Kristi Weir
 4639 133rd Ave SE
 Bellevue WA

I-183-1 Comment noted.

This is a second and separate submission from me.

Barbara Braun - 13609 SE 43rd Place

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element – described in the [2021 budget \[Section 129 \(126\)\]](#) – must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

I-184

COMMENT

RESPONSE

I-184-1 You are added as a party of record.



I-184-1 |

I-185

COMMENT

RESPONSE

I-185-1 You are added as a party of record.



I-185-1 |

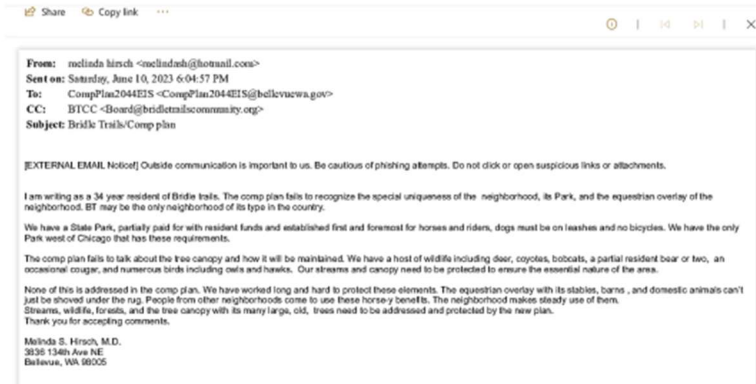
I-186

COMMENT

RESPONSE

I-186-1 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space. See Common Response 9 Plants and Animals. See Common Response 16 Critical Areas.

I-186-1



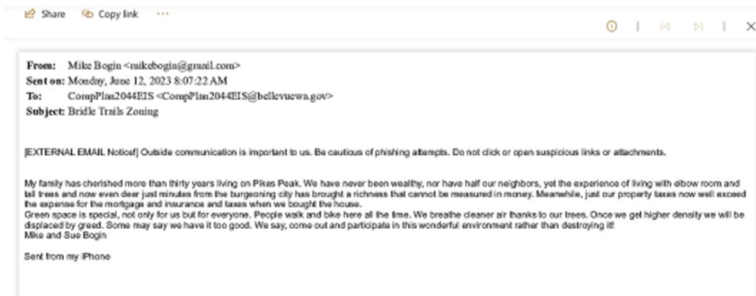
I-187

COMMENT

RESPONSE

I-187-1 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space.

I-187-1



I-188

COMMENT

RESPONSE

I-188-1 Comment noted.



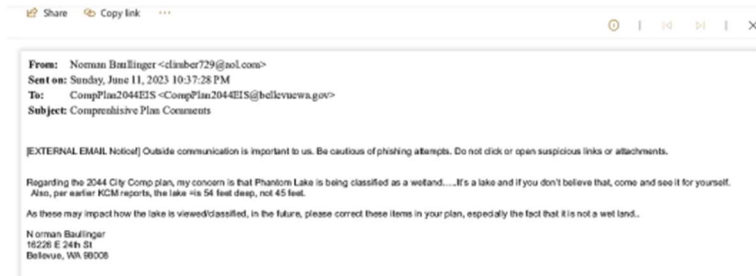
I-188-1

I-189

COMMENT

RESPONSE

I-189-1 See Common Response 20 Phantom Lake.



I-189-1

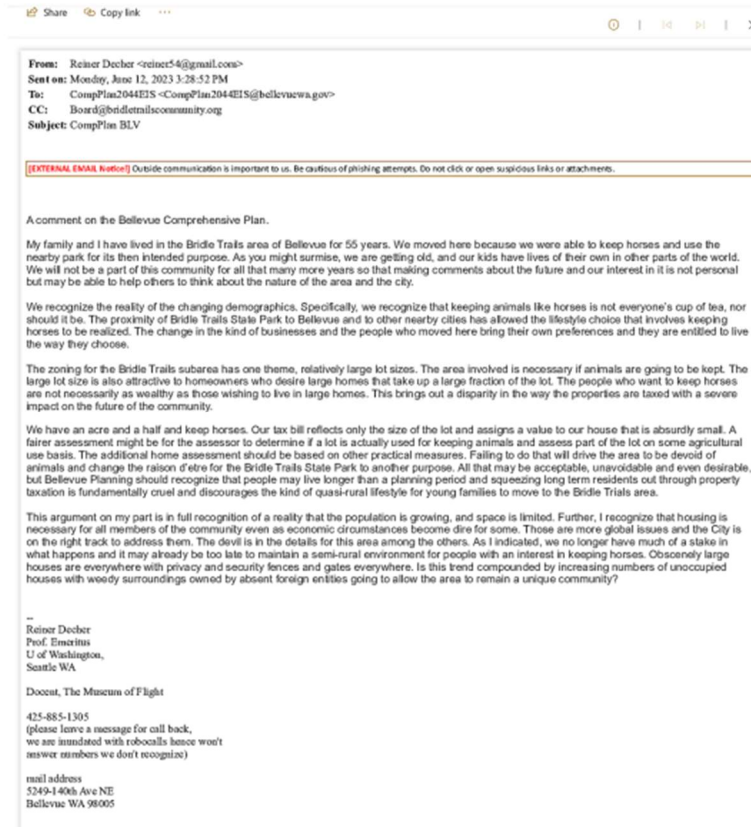
I-190	COMMENT	RESPONSE
I-190-1	<p>We need more housing of all types in all areas of Bellevue AADU's, Dadu's, Duplexes, Townhomes. We need more and smaller housing so that existing people can stay in Bellevue and downsize we also need it for Kids growing up that want to stay here and for working class people who currently cannot afford to live where they work. it will be gradual and if done well will fit into existing neighborhoods. Thanks Troy Schmeil</p>	I-190-1 See Common Response 4 Housing Alternatives.
I-191	COMMENT	RESPONSE
I-191-1	<p>I am the Founder and Executive Director of Eastside For All, a local nonprofit organization that advances racial and social equity in East King County. One of the top priorities in all the communities we work with is housing. I'm submitting comments to urge Bellevue to make decisions that are aligned with the first recommendation listed in Bellevue's recently released report on air quality and land use planning: "Apply an equity lens during all planning processes for land use adjacent to high-volume roadways." (p. 44) An equity lens requires that priority is given to people and groups who experience the greatest inequities, the least amount of resources, and the least representation in decision-making.</p>	I-191-1 The EIS and the underlying technical review provide analysis of air quality impacts and potential mitigation options to address those identified air quality impacts. See Common Response 8 Air Quality/GHG. Land use buffers, as well as the other mitigation measures identified in the EIS, remain options when the city updates and adopts its policies, codes, standards, or regulations.
I-191-2	<p>In decisions and policies related to housing, this would generally include renters (as opposed to home owners) and within the group of renters, it would include those who are most at risk for displacement (Black, Indigenous and other people of color), and within that group, it would include those who are the most cost burdened.</p>	
I-191-3	<p>One key decision under consideration is about land use in close proximity to freeways. With the established health risks well documented in Bellevue's report, I ask for Bellevue to take into account those risks and the disproportionate impact on the populations mentioned above. Avoid increasing capacity for sensitive uses (schools, daycares, and housing) within 500 feet of high volume roadways. You have the opportunity to make a decision which could prevent unnecessary negative health impacts for children, adults, and elders in Bellevue.</p>	I-191-2 See Common Response 15 Equity and Environmental Sustainability Metrics. I-191-3 See Common Response 6 Noise. See Common Response 8 Air Quality/GHG.
	<p>Please center the needs of people who have the most to lose.</p> <p>Thank you, Debbie Lacy</p>	

I-192

COMMENT

RESPONSE

I-192-1 See Common Response 4 Housing Alternatives.



I-192-1

I-193

COMMENT

RESPONSE

I-193-1 | Dear City of Bellevue, it's important our city pushes for better access and safety to multi modal transportation to meet its climate change goals and vision zero goals. The recent designs on our streets have all been in favor of making one mode, motor-vehicles, the most dominant. In addition, mixing bicycles and pedestrians with motor-vehicles have been critical in recent years. Please, first reconsider who you're designing streets for: Is it people or cars?

I-193-2 |

Thank you!

I-193-1 The Mobility Implementation Plan, adopted in April 2022, describes the intended performance of each mode of the transportation system; pedestrian, bicycle, transit, and vehicle. In areas of the city where the most growth is expected to occur under this Comprehensive Plan Periodic Update, an emphasis is on creating walkable and bikeable neighborhoods that are well served by transit and where vehicle mobility is necessary for the movement of people and goods.

I-193-2 All alternatives use the same transportation network for the analysis, which is the existing network plus new transportation investments adopted in the 2022-2033 Transportation Facilities Plan (TFP). Alternative 3 and the Preferred Alternative include the evaluation of the extension of NE 6th St as well. However, mitigation measures include expanding the bicycle and pedestrian facilities. The Mobility Implementation Plan, adopted in April 2022, describes the intended performance of each mode of the transportation system; pedestrian, bicycle, transit, and vehicle. In areas of the city where the most growth is expected to occur under this Comprehensive Plan Periodic Update, an emphasis is on creating walkable and bikeable neighborhoods that are well served by transit and where vehicle mobility is necessary for the movement of people and goods.

I-194

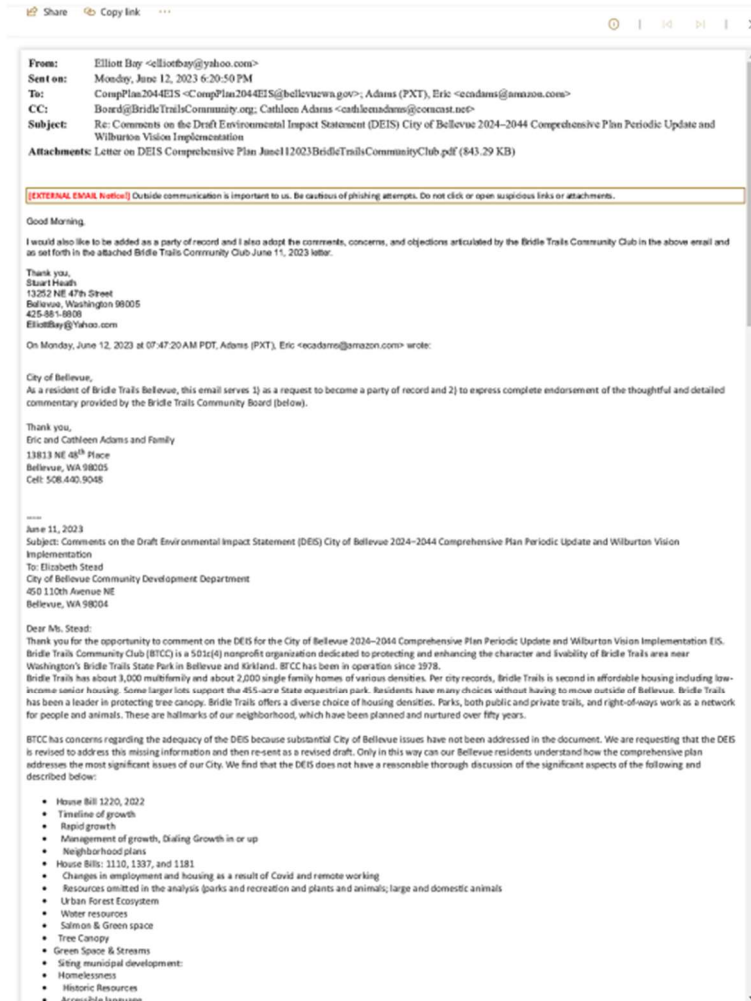
COMMENT

RESPONSE

I-194-1 You are added as a party of record.

I-194-2 Comment noted.

I-194-1
I-194-2



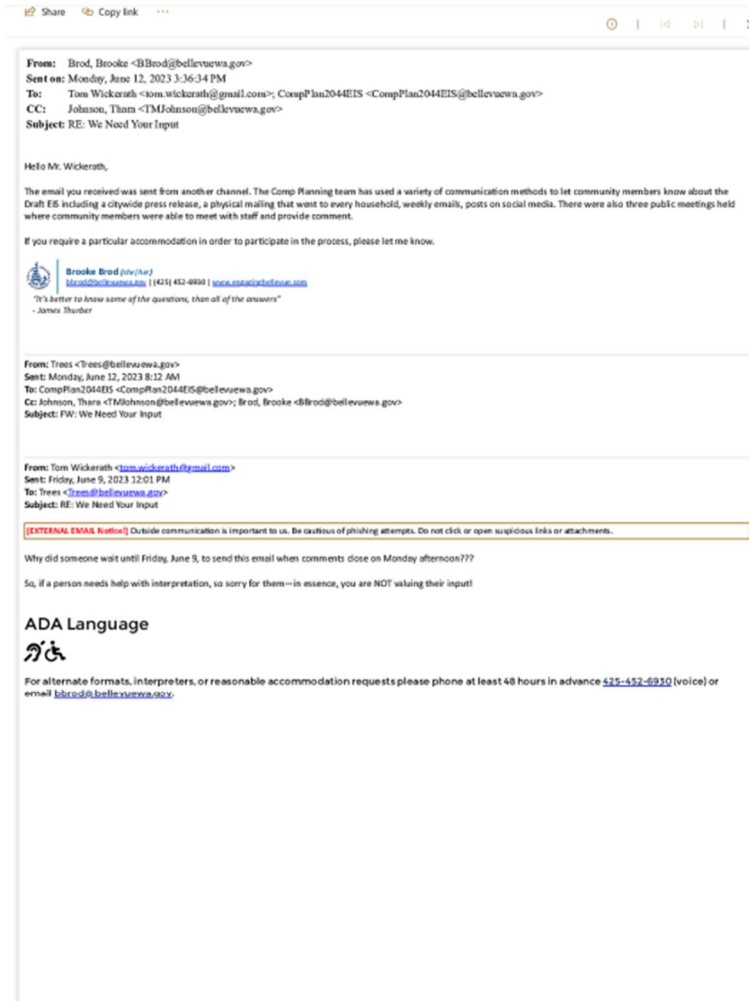
I-195

COMMENT

RESPONSE

I-195-1

The City has several communication methods including daily digest bulletins, email listservs, and newsletters. The Comprehensive Plan Periodic Update team uses a variety of communication methods to inform community members about the DEIS, including a citywide press release, physical mailing to every household, weekly emails, posts on social media, and three public meetings.



I-195-1

I-196

COMMENT

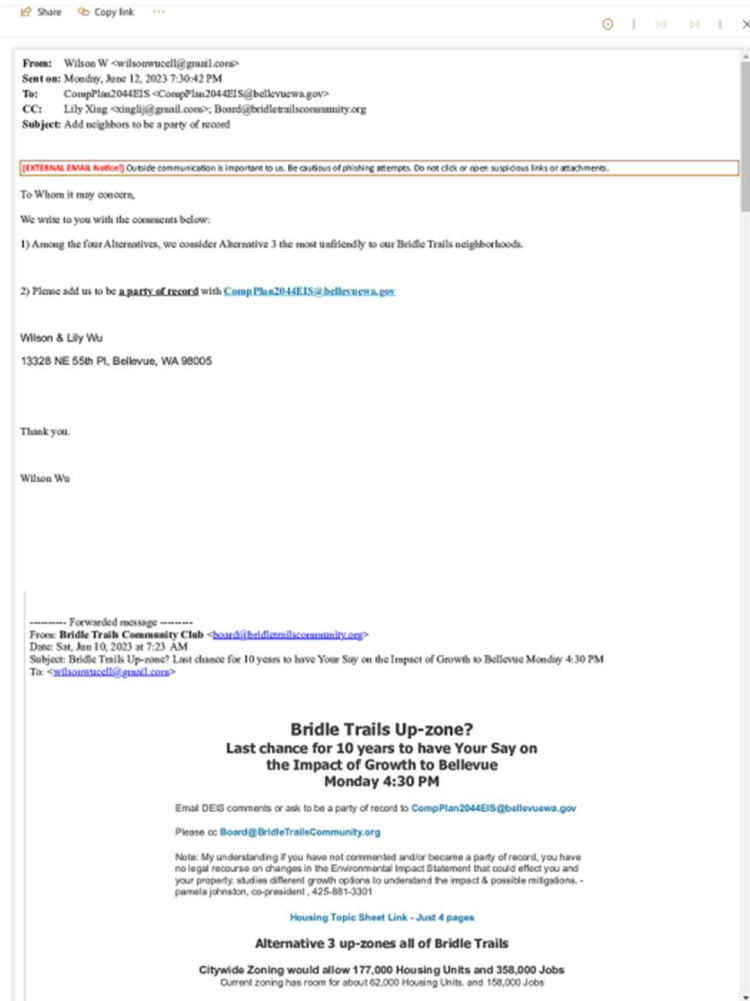
RESPONSE

I-196-1 Comment noted.

I-196-2 You are added as a party of record.

I-196-1 |

I-196-2 |



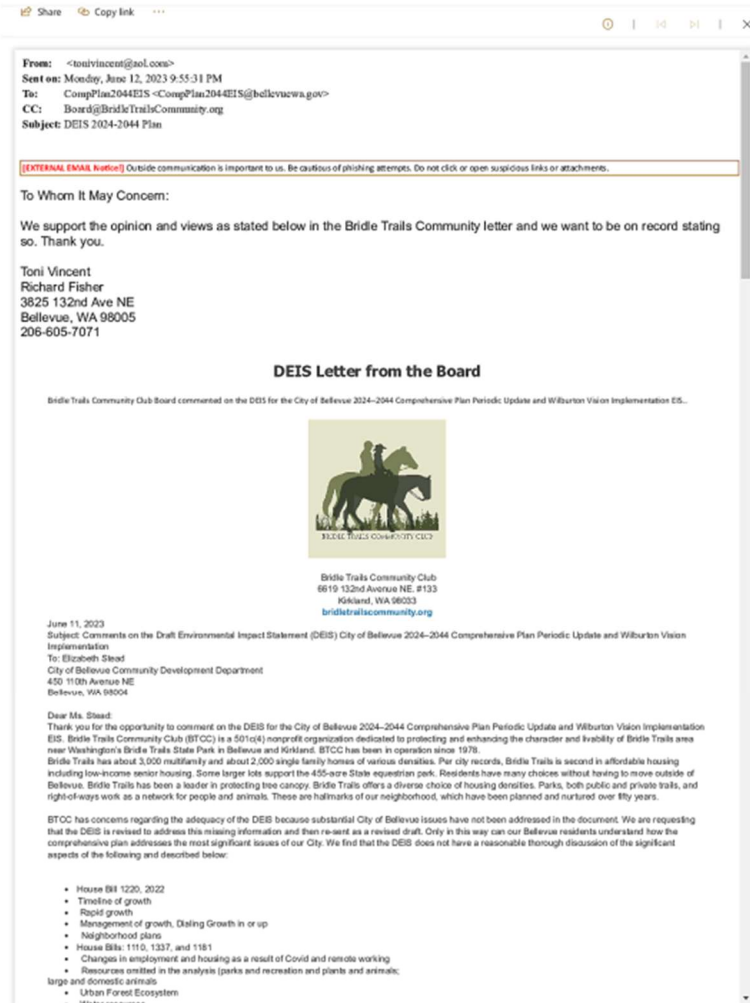
I-197

COMMENT

RESPONSE

I-197-1 Comment noted.

I-197-1



I-198

COMMENT

RESPONSE

From: Susie <spinaker4@comcast.net>
Sent on: Monday, June 12, 2023 9:54:07 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
Subject: Request to be a party of record

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

Susie Gzell
 18712 SE 7th St
 Bellevue 98008
 Spinaker4@comcast.net

Request to be a part of record comp plan 2044

Thank you

I-198-1 You are added as a party of record.

I-198-1

I-199

COMMENT

RESPONSE

From: <schwab.s@hcsconstruction.com>
Sent on: Monday, June 12, 2023 9:53:01 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
CC: schwab.s <schwab.s@hcsconstruction.com>
Subject: DEIS/ Com, p Plan

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

I agree with the Bridle Trails Community Club letter. There needs to be more time to research and study the impacts to our community.
 Sherry Schwab

I-199-1 Comment noted.

I-199-2 The comment period was 45 days, the maximum period under SEPA regulations. The completion of the FEIS required additional analysis time to include additional analysis of housing, trees, and other issues.

I-199-1
I-199-2

I-200

COMMENT

RESPONSE

From: Richard Hughes <richard_hughes@outlook.com>
Sent on: Monday, June 12, 2023 9:48:14 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
Subject: Draft EIS

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

Good Morning,

I would like to be added as a party of record and I also adopt the comments, concerns, and objections articulated by the Bridle Trails Community Club in their emailed letter dated June 11, 2023 (emailed to you today).

Thank you,

Richard Hughes
 13709 NE 48th Pl
 Bellevue 98005

I-200-1 You are added as a party of record.

I-200-2 Comment noted.

I-200-1
I-200-2

I-201

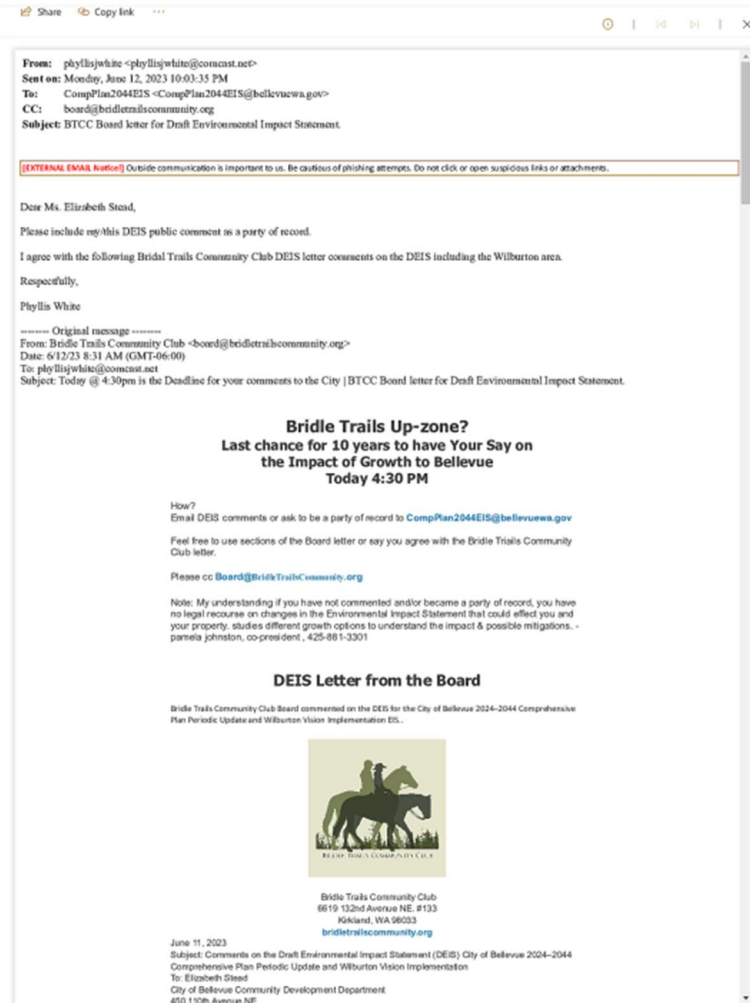
COMMENT

RESPONSE

I-201-1 You are added as a party of record.

I-201-2 Comment noted.

I-201-1 |
I-201-2 |



I-202

		COMMENT	RESPONSE
I-202-1	Pues los cambios que están haciendo están bien los de el plan segundo póque generar trabajos y viviendas esta bien pero no ha una forma muy rápida.	I-202-1	Comentario anotado (Comment noted).
I-202-2	Mucha gente como yo quiere un lugar seguro para vivir no para trabajar más y gastar más al ritmo que no sientes como pasa tu día. Ese es mi opinión yo he vivido en bellevue por 24 años y es una de las ciudades más seguras.	I-202-2	Comentario anotado (Comment noted).

I-203

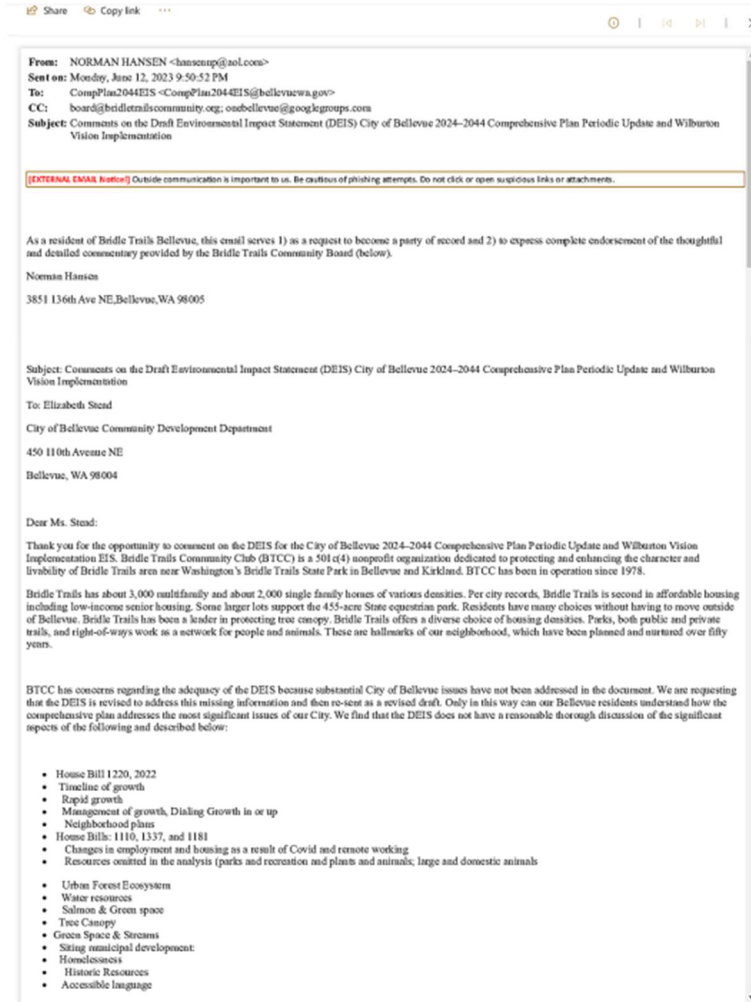
COMMENT

RESPONSE

I-203-1 You are added as a party of record.

I-203-2 Comment noted.

I-203-1 |
I-203-2 |

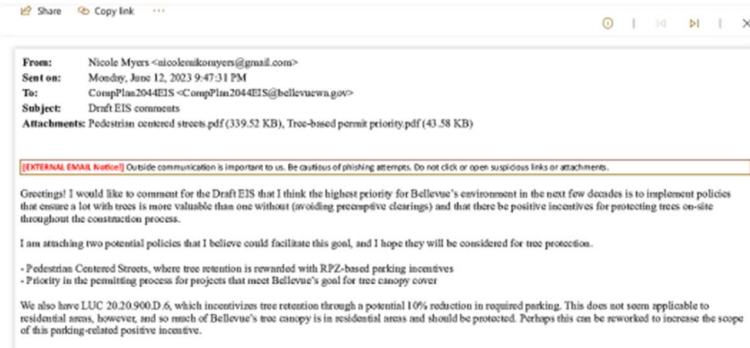


I-204

COMMENT

RESPONSE

I-204-1 See Common Response 2 Tree Canopy.



I-204-1

I-204

COMMENT

RESPONSE

DRAFT

I-204-2 Comment noted.

I-204-2

Bellevue's Pedestrian Centered Streets

Pedestrian Centered Streets are like parks for walking. They have trees, birdsong, and a variety of plants to see in people's yards. Sidewalks may be pedestrian-friendly, but it's even better to walk on a smooth roadway with no sidewalks where pedestrians outnumber cars, trees shade the road, and sight lines aren't blocked by cars.

As we anticipate increased density, we can expect greater parking demand, which creates the possibility of using carrots rather than sticks to protect trees. A restricted parking zone (RPZ) with incentives for tree protection can be implemented at the same time as special rules to keep streets safe. Slower speeds and parking changes will ensure two-lane streets are pedestrian-friendly, so we get the good density (more residents) and avoid the bad kind of density (excessive on-street personal vehicle storage and lot clearings).



Bellevue Healthy Streets were chosen for their low traffic volumes and ability to create connections to parks and essential services (2023 photo)

Key Elements

- Pedestrian sharrows
- Tree protection incentives
 - With a significant tree on your property, reduction in the minimum parking requirement by one parking space, and/or an additional RPZ permit for daytime street parking for every two significant trees on your property.
- Default RPZ allotment simply based on length of road frontage.
 - Homeowners can request a doubling of RPZ frontage credit by documenting that a segment is usable for parking a vehicle at least 10' from centerline of road.
- Car parking separation minimum 15' from a vehicle across the street
- Planned addition of speed cushions once street has 600 vehicles per day (presume pedestrian usage increases by the same proportion, multiplying ped-car conflicts)
- 20 MPH speed limit
- Routine, frequent RPZ enforcement
- Tree map online showing participating trees and arborist reports
- Parking strip classification map online

<p>For pedestrians: Reduced heat island effect vs. a roadway with a 6' sidewalk More shade from trees close to roadway A smooth road surface is easier for strollers and wheelchair users to navigate than a sidewalk with curb cuts. Presence of trees and greenery close to the roads will encourage slower driving</p>	<p>For drivers: Never have to circle to find parking on the street Don't have the binary of fully on-street or fully off-street parking that is produced by a sidewalk. Opportunity to save fuel by having alternatives like cycling and walking in neighborhood be more appealing and accessible</p>
<p>For property owners: Keep flexibility in use of space along road frontage (ditch, planted slope, trees, gravel pullout, grass) Not responsible for sidewalk construction costs May get more flexibility in locating on-site parking on property if it is pervious and set back from ROW.</p>	<p>For city: Lower impact development (LD) principles can reduce costs associated with surface water management modifications. Less construction along roadways means fewer disruptions to residents Lower municipal carbon footprint Meet tree canopy goals</p>

DRAFT

I-204

COMMENT

RESPONSE

I-204-3

Prioritization in the permitting process for construction on lots that will meet the city's overall target for tree canopy at time of occupancy will encourage tree retention and planting. This would be much easier to accomplish with existing trees since newly planted trees are likely to be much smaller than their potential future size, but it will also provide flexibility for a builder to meet this target with new plantings.

Potential refinements:

I would expect the prioritization of affordable homes for birds to fall below the prioritization of affordable housing for people, of course, but I think it could stack within the affordable/non affordable categories as follows:

Affordable housing, >40% canopy

Affordable housing, <40% canopy

Market-rate housing/commercial with >40% canopy

Market-rate housing/commercial with <40% canopy

Trees more than 80' tall or landmark trees at least 40' tall should count as having double the canopy, maybe triple if they are over 100' tall.

I would also consider any plant over 10-15 feet to be part of the canopy; there are some glorious rhododendrons, lilacs, and camellias in my neighborhood that are capable of providing shade. Of course, if we expand the classification of canopy greenery we should also place restrictions on the use of nuisance/invasive plants to meet this goal, possibly with exceptions for root-spreading plants like bamboo as long as they are adequately boxed-in. Could also start by making a list of "good" plants that will count.

If a tree trunk is entirely on the property being developed, but it provides canopy that crosses over the property line, allow that canopy to count toward the total with the permission of the affected neighbor.

If a tree is in the roadside strip that's city property, perhaps the builder can decide whether to include that strip in the calculation of the canopy percentage, with trees in this area also counted double (it is harder to meet the goal percentage in this area because the driveway and construction equipment access take some room, but these trees contribute disproportionately to a better pedestrian experience).

The builder should be required to make a reasonable effort to maintain canopy between getting occupancy and when the property is sold.

The Vuecrest comment at the June 8th listening session was interesting, since I didn't know about their tree height restrictions for view protection, but perhaps they can use shorter species of trees to meet the canopy target.

It is easier to use a drone shot to validate canopy extent in summer than winter, but we can start to collect images that show sample overhead views of yards and construction sites in summer and winter, so that a calculation can be made from aerial imagery even when branches are bare.

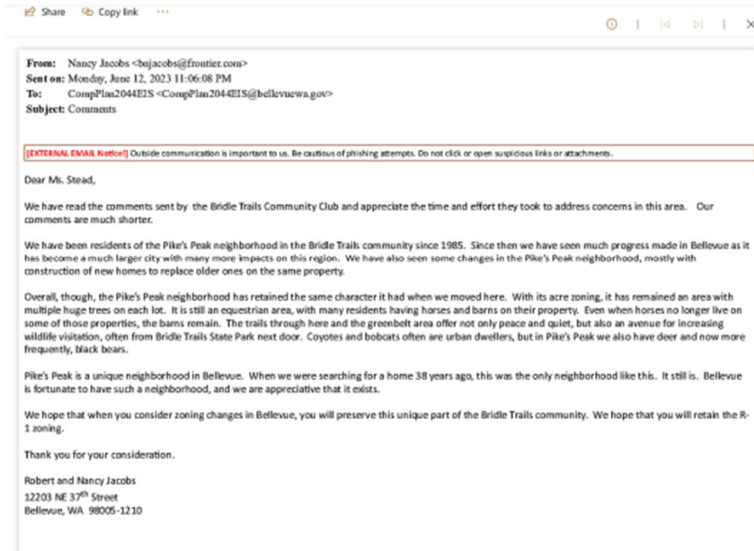
I-204-3 Comment noted. Permitting is outside the scope of the EIS.

I-205

COMMENT

RESPONSE

I-205-1 See Common Response 9 Plants and Animals. See Common Response 19 Zoning Details.



I-205-1

I-206

COMMENT

RESPONSE

I-206-1 You are added as a party of record.
 I-206-2 Comment noted.



I-206-1
 I-206-2

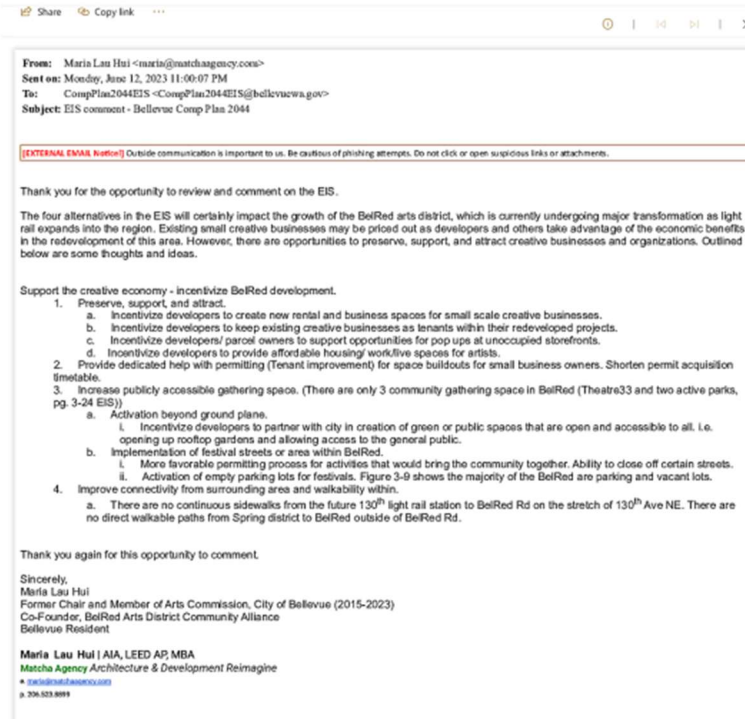
I-207

COMMENT

RESPONSE

- I-207-1 Comment noted. Details of programs to support the creative economy are beyond the scope of the EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review.
- I-207-2 Details of programs to support the creative economy are beyond the scope of the EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review.
- I-207-3 Comment noted. Permitting is outside the scope of the EIS.
- I-207-4 See Common Response 7 Parks and Open Space.
- I-207-5 Comment noted. Permitting is outside the scope of the EIS. See Common Response 19 Zoning Details.
- I-207-6 As development occurs in BelRed near each light rail station, city investments and private development will complete the sidewalk network. A gap in Spring Boulevard between 124th Avenue NE and 130th Avenue NE is in the early stages of design.

- I-207-1
- I-207-2
- I-207-3
- I-207-4
- I-207-5
- I-207-6



I-208

COMMENT

RESPONSE

I-208-1 You are added as a party of record.

I-208-2 Comment noted.

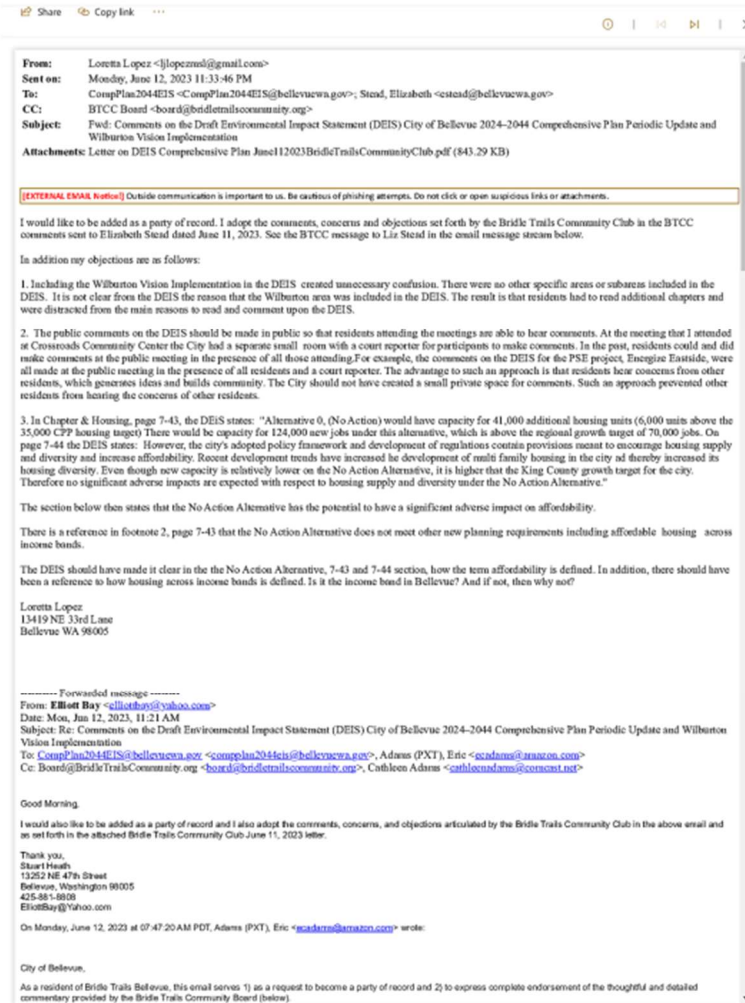
I-208-3 A DEIS was prepared for the Wilburton study area, which at the time was referred to as the Wilburton Commercial Area, in February 2018. The DEIS was followed by the Wilburton Commercial Area Study Citizen Advisory Committee report in July 2018. The study identified a “preferred alternative” for 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.

I-208-4 The intent of the court reporter was to make commenting accessible to more people and to provide an option to those persons that did not want to speak in front of the audience. All comments and responses are public at the time the FEIS is published.

I-208-5 See Common Response 4 Housing Alternatives.

I-208-6 DEIS Chapter 7, *Housing*, page 7-12 provides a definition for the term affordability. As described in Chapter 7 of the DEIS, “the term affordable housing refers to a household’s ability to find housing within its financial means. The city further defines affordable housing as affordable to 80 percent Area median income (AMI). AMI is the widespread metric used for assessing housing affordability and developed by HUD (the U.S. Department of Housing and Urban Development) for determining eligibility for subsidized housing. HUD establishes extremely low-, very low-, low-, and median-income thresholds for households between one and eight people in size based on incomes in a metropolitan area. The City of Bellevue falls within the Seattle-Bellevue HUD Metro Fair Market Rent (FMR) Area, which extends over King and Snohomish counties.”

I-208-1
I-208-2
I-208-3
I-208-4
I-208-5
I-208-6

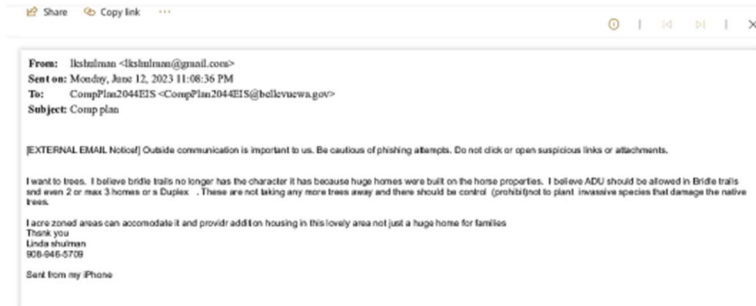


I-209

COMMENT

RESPONSE

I-209-1 See Common Response 2 Tree Canopy.



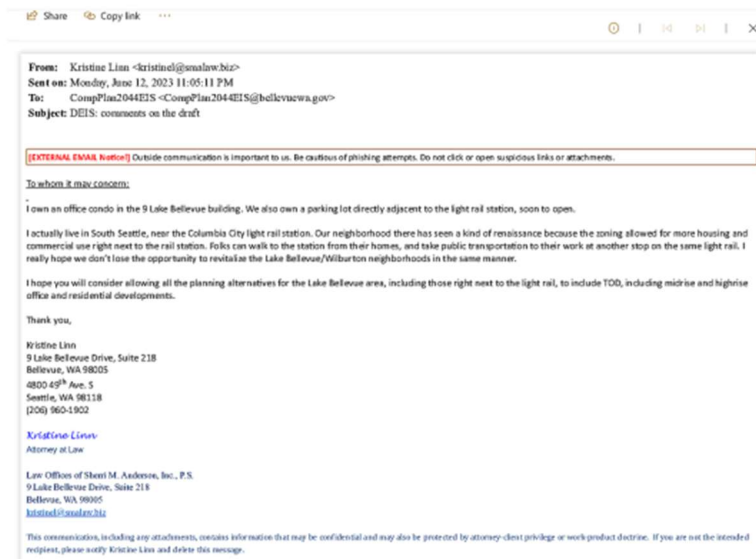
I-209-1

I-210

COMMENT

RESPONSE

I-210-1 The Preferred Alternative studied in the FEIS included future land use around Lake Bellevue with a RC-M (Residential/Commercial-Medium) character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.



I-210-1

I-211

COMMENT

RESPONSE

I-211-1 | Will have to send in tomorrow, just got home from a appt with husband that went way long.

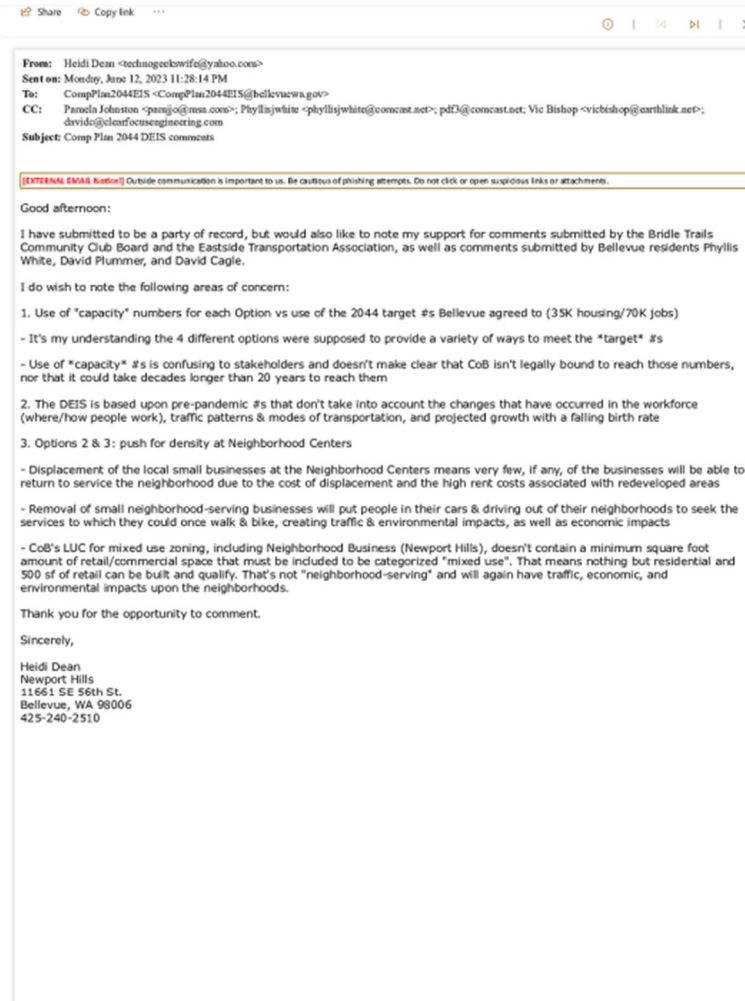
I-211-1 | Comment noted.

I-212

COMMENT

RESPONSE

I-212-1
I-212-2
I-212-3
I-212-4
I-212-5
I-212-6



I-212-1 Comment noted. You are added as a party of record.

I-212-2 The growth targets remain the same under any of the alternatives. See Common Response 13 Growth Targets.

I-212-3 See Common Response 11 Impact of COVID-19.

I-212-4 The DEIS concludes that adverse commercial displacement impacts are expected under all of the alternatives through redevelopment or being priced out as land prices and rents increase (see DEIS Chapter 3, *Land Use Patterns and Urban Form*, page 3-84). The City prepared a report that provides economic analysis to support the EIS process by broadly evaluating the fiscal impacts of each alternative, for the city, and the Wilburton study area. The economic analysis included recommendations to address impacts to small businesses, which are incorporated as plan features or mitigation measures in the DEIS. As described on pages 3-86 and 3-87, the Action Alternatives incorporate plan features that would increase Alternative 2 and 3 densities and opportunities for mixed use development that could support additional commercial space affordable to small business and entrepreneurs. Other mitigation measures as detailed on pages 3-88 and 3-89 could include: incentives that encourage affordable commercial space for businesses, especially in areas at high risk of displacement; and anti-displacement measures prior to designating new Neighborhood Centers (e.g., 'right to return' policies and community benefit agreements). These mandatory or voluntary measures would mitigate potential adverse impacts of commercial displacement to less-than-significant levels under the Action Alternatives.

I-212-5 The DEIS acknowledges that involuntary commercial displacement would occur at different levels depending on the Action Alternative. Land use patterns and policies to mitigate potential displacement and support small-scale commercial, retail, and mixed-use development in various parts of the city are discussed in DEIS Chapter 3, *Land Use Patterns and Urban Form*, Section 3.3.3 through 3.3.6. Contrary to the commenter's statement that the Action Alternatives would result in people driving out of their neighborhoods to seek services, the Comprehensive Plan Update would likely improve access to amenities and diverse land uses. The composition of community amenities would likely shift to reflect a more mixed-use pattern of development with new community retail and services. In addition, the analysis in FEIS Chapter 11, *Transportation*, VMT per capita (average number of vehicle miles traveled by each Bellevue resident and/or worker) is expected to decrease under all Action Alternatives.

I-212-6 See Common Response 19 Zoning Details.

I-212

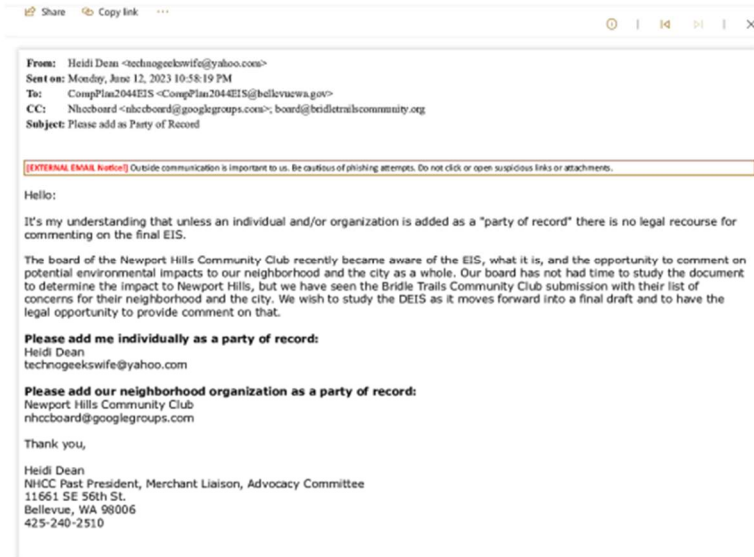
COMMENT

RESPONSE

I-212-7 Comment noted.

I-212-8 You are added as a party of record.

I-212-9 Your organization has been added as party of record.



I-212-7

I-212-8

I-212-9

I-213

COMMENT

RESPONSE

I-213-1 You are added as a party of record.



I-213-1

I-214

COMMENT

RESPONSE

From: Curt Allred <curtallred@live.com>
Sent on: Monday, June 12, 2023 11:23:46 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
Subject: Comprehensive Plan DEIS comments

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

Hello,
I am a 23 year resident of Bellevue. I am concerned that none of the alternatives covered by the Comprehensive Plan DEIS sufficiently address these 3 topics:

- 1 - Greenhouse Gas Emission
- 2 - Tree Canopy
- 3 - Traffic Gridlock

Greenhouse Gas Emission

The Plan and DEIS do not contain sufficient metrics, monitoring plans, and corrective actions to ensure that we will achieve a 50% reduction in GHG emission by 2030. The city is already falling short of that goal, and the growth alternatives will certainly add more GHG emission impact. All new construction must be net-zero emission or even net-negative to offset existing GHG sources. This will be difficult to institute, and major backlash from developers can be expected. I do not believe that, as written, this Plan has a chance of meeting the city's emission goals.

Tree Canopy

The Plan and DEIS do not contain sufficient provisions and analysis to ensure that we will achieve and maintain a 40% tree canopy. Bellevue is losing trees at an alarming rate, with little to no mitigation. Developers are currently allowed to clear-cut property when building their oversized, energy-inefficient monster houses. The few cases of mitigation are basically slubs or small trees to replace the 100-200 year old evergreens that were cut down. The new tree code being developed should be an integral part of this Comprehensive Plan, and must be written to insure growth in tree canopy, and incorporate enforcement with serious consequences to violators. This topic will also cause major backlash from developers and property owners. Unless this is addressed in the Plan with additional analysis and actions, I believe it has no chance of achieving a 40% tree canopy.

Traffic Gridlock

Traffic throughout Bellevue is a major problem, resulting in lost productivity hours, road rage incidents, pollution, and presumably mental and physical health problems for drivers. This will only be exacerbated by permitting higher density construction in neighborhoods far from convenient public transit. Growth in remote neighborhoods should NOT be encouraged or allowed unless sufficient transit is put in place to compensate for the additional traffic. All approved housing expansions must be located within walking distance (5 min) of a major transit corridor. Encouraging growth outside transportation corridors is irresponsible and should not be part of the plan.

Thank you for the opportunity to submit my comments.
Curtis Allred
13609 SE 43rd Pl, Bellevue

I-214-1

I-214-2

I-214-3

I-214-1 See Common Response 8, Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.

I-214-2 See Common Response 2 Tree Canopy.

I-214-3 In all of the alternatives, the majority of the residential growth capacity is within the Mixed Use Centers, especially Downtown, Bel Red & Wilburton, which are all well served by public transportation options such as light rail and bus service.

From: Curt Allred <curtallred@live.com>
Sent on: Monday, June 12, 2023 10:38:52 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
Subject: Comprehensive Plan DEIS comment re: GHG reduction

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

Hello,
I completely agree with and support Barbara Braun's comments submitted to you earlier, and copied below for your convenience.

Thank you,
Curtis Allred
13609 SE 43rd Pl, Bellevue

I-214-4

I-214-4 Comment noted.

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adopt or adopt into their comprehensive plans as part of their periodic update. The model element – described in the [2021 Budget \(Section 129.1126\)](#) – must be completed by June 2023 and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

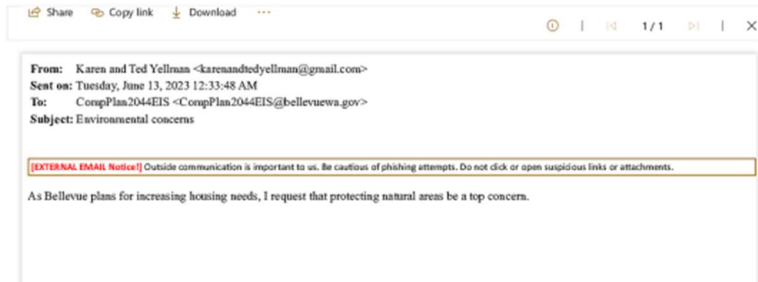
Thank you!

I-215

COMMENT

RESPONSE

I-215-1 See Common Response 16 Critical Areas.



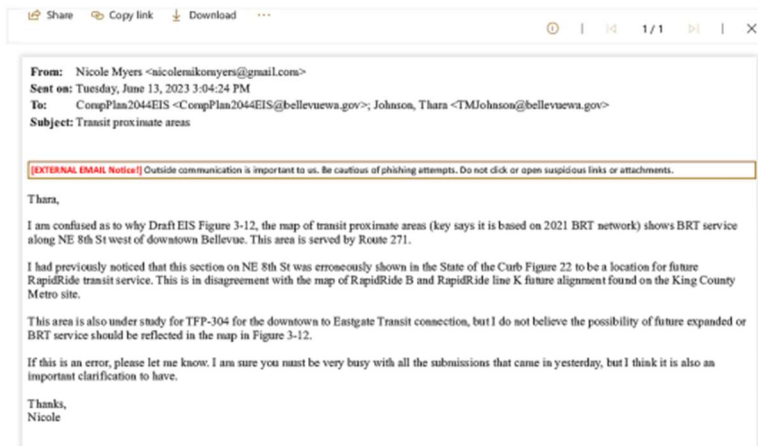
I-215-1

I-216

COMMENT

RESPONSE

I-216-1 The map of transit proximate areas is based on the frequent transit network (FTN) map that the city has used for many purposes. The FTN includes frequent bus service, not just the RapidRide buses. The FTN was created in 2019 and has been carried forward, though bus routes have changed over the pandemic and recovery period.



I-216-1

L-1

COMMENT

RESPONSE

June 12, 2023

TO: City of Bellevue Development Services Department
CompPlan2044EIS@bellevuewa.gov

FM: Richard Gelb, Environmental Health Planner, Public Health Seattle/King County

RE: City of Bellevue Comprehensive Plan EIS scoping proposal

L-1-1

Public Health Seattle & King County appreciates the transit-focused growth approaches of the City of Bellevue's Comprehensive Plan alternatives and the importance of the focus areas: equity, displacement, and economics.

By inducing physical activity, transit-focused growth has significant health benefits over more car dependent land uses, however from a Public Health perspective, it is important to achieve this growth pattern without placing income-restricted housing units directly adjacent to very high-volume roadways. In general, residential uses are where building-scale air and noise mitigation measures are proving least effective.

Diesel exhaust is the main source of potential cancer risk from air pollution sources in King County.¹ Noise pollution from vehicle traffic contributes to high blood pressure, heart disease, sleep disturbances, and reduced school performance.^{2,3} After an extensive assessment, the California Air Resources Board recommends avoiding sensitive uses within 500 feet of roadways carrying over 100k average vehicles per day.⁴

L-1-2

Given the health consequences of high-volume (> 100k AADT) roadway-adjacent residential uses, it would be helpful to include an alternative in the final EIS that: 1) puts non-residential uses and/or market-rate housing in the zone closer to high volume roadways, and 2) sets back (>500') uses that include income-restricted housing units. This approach might be considered an 'Affordable Housing Highway Setback Alternative'.

Thank you for considering including in the City of Bellevue Comprehensive Plan EIS scope (including for the Wilburton Commercial Area study) a growth alternative that avoids placing more-vulnerable building occupants (income-restricted housing) in geographies with outsized exposure to noise and air pollution from high volume traffic corridors.

¹ Puget Sound Clean Air Agency, Chinatown-International District Air Toxics Study, 2016, <https://pscleanair.gov/DocumentCenter/View/3398>.

² HEI Panel on the Health Effects of Traffic-Related Air Pollution, "Traffic-related air pollution: a critical review of the literature on emissions, exposure, and health effects", HEI Special Report 17, Boston, MA: Health Effects Institute, 2010.

³ <https://iopscience.iop.org/article/10.1088/1748-9326/ac1bd8#erlac1bd8bib16>

⁴ [ARB's Air Quality and Landuse Handbook \(ca.gov\)](#)

L-1-1

See Common Response 4, Housing Alternatives. See Common Response 6 Noise. See Common Response 8 Air Quality/GHG.

L-1-2

See Common Response 8, Air Quality. Many of the places adjacent to high-volume roadways that have a future land use designation different from the existing designation are identified as some type of mixed use. The mitigation measures you mention and those contained in Chapter 8 and recommendations in Appendix J are steps the City could take to reduce the impact on people in general and especially those households with the lowest incomes.

L-2

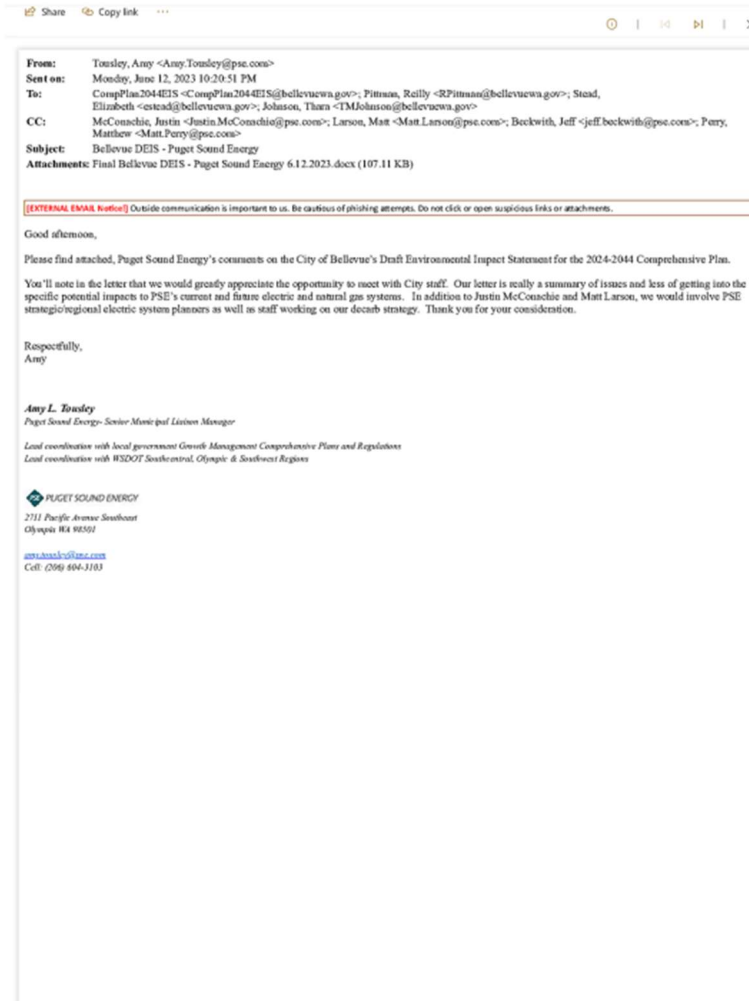
COMMENT

RESPONSE

L-2-1

City staff will continue to coordinate with PSE on planning for future growth.

L-2-1



L-2

COMMENT

RESPONSE

L-2-2 Comment noted.

L-2-3 FEIS Chapter 10, *Public Services and Utilities*, directly acknowledges PSE as a non-city managed utility.



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

June 12, 2023

Reilly Pittman, Senior Planner
City of Bellevue Development Services Department
450 110th Avenue N.E.
Bellevue, WA 98004

Re: 2024-2044 Comprehensive Plan (Periodic Update) and Wilburton Vision Implementation
Draft Environmental Impact Statement

Dear Mr. Pittman:

This letter from Puget Sound Energy (PSE) pertains to the Draft Environmental Impact Statement (DEIS) issued on April 27, 2023. The DEIS has been prepared to address both existing conditions and potential impacts based on three Action Alternatives. These alternatives will be considered in the Final Environmental Impact Statement (FEIS) established for the City's 2024-2044 Comprehensive Plan and Wilburton Vision Implementation documents.

First and foremost, the DEIS is well composed and provides a comprehensive analysis of the Action Alternatives proposed. It articulates the interrelatedness of other plans, policies and regulations that are part of the periodic update. Without a doubt, there has been a lot of change in conditions since 2015. This is certainly true for Puget Sound Energy where planning and implementation programs like PSE 2030 and Beyond Net Zero are part of the comprehensive plan framework.

As part of the scoping process, PSE submitted a letter on October 31, 2022. We acknowledge that these comments have generally been reflected or referenced in various Chapters of the DEIS. We offer the following comments on the DEIS:

Chapter 1. Summary
The DEIS states that citywide impacts to public services and utilities will be identified through the City's capital facilities planning process as the means to address potentially adverse impacts.

L-2-2

L-2-3

L-2

COMMENT

RESPONSE

L-2-4 The city looks forward to continued coordination with PSE on electrical and natural gas facility planning for the Comprehensive Plan.

L-2-5 The city looks forward to continued coordination with PSE on improvements that may be needed to address growth.

Reilly Pittman, City of Bellevue
June 12, 2023
Page Two

L-2-3

This suggests that the evaluation and mitigation strategies specifically address only city owned utilities and not non-city owned utilities. The mitigation measures list does identify that non-city utility providers may need to plan for new or improved facilities. It is important for the City to work with non-city owned utilities to support needed improvements in a timeframe that is concurrent with the growth forecasted in the Action Alternatives. This includes identifying mitigation measures to address potentially adverse impacts.

This is consistent with the City’s Comprehensive Plan framework to ensure that people who live, work, learn, and play in Bellevue: “Have a resilient built and natural environment”; and “Receive equitable and quality public service and capital facilities that support their daily needs”.

Chapter 2. Alternatives

While it is not PSE’s role to agree or disagree with how cities and counties plan for growth in their comprehensive plans; we do believe that it is our responsibility to convey how potential growth may or may not impact electric and natural gas facilities and services. After review of the DEIS, PSE believes that all of the proposed Action Alternatives including the No Action alternative will have potential impacts upon electric and natural gas systems.

L-2-4

	Existing Conditions	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
2022 Population	153,900				
Capacity for Additional Housing Units	62,000	41,000	59,000	77,000	95,000
Capacity for Additional Jobs	158,000	124,000	179,000	177,000	200,000
Capacity for Commercial Development		40M SF	58.5M SF	58.3M SF	67.3M SF

PSE would like to continue working with the City on how these Action Alternatives may or may not potentially impact electric and natural gas systems. These potential impacts could be reflected in the FEIS and/or the 2024-2044 Comprehensive Plan.

L-2-5

Chapter 3. Land Use Patterns and Urban Form

PSE believes that guiding additional growth to concentrated areas can be supported. However, addressing the growth may require additional and/or upgraded system improvements such as electric substations, transmission and distribution facilities. In general, these new and/or

L-2

	COMMENT	RESPONSE
	<p>Reilly Pittman, City of Bellevue June 12, 2023 Page Three</p>	
L-2-5	<p>upgraded facilities should be located proximate to the area creating the additional demand for services. Proposed land use and zoning should recognize, support and compliment the need for additional utility facilities in or near urban centers as well as citywide.</p>	
L-2-6	<p>Chapter 4. Relationships to Plans and Policies. The DEIS identifies numerous plans and policies which are connected to the successful implementation of the 2024-2044 Comprehensive Plan and subsequent development regulations. We appreciate the City's understanding that PSE is a regulated electric and natural gas utility in the state of Washington. As such, PSE is required to have an approved Integrated Resource Plan (IRP) with the Washington Utilities Transportation Commission. The IRP and other plans are developed, approved and implemented to meet the state's energy, climate and equity requirements. PSE encourages the City to continue integration of these plans including PSE's to address the final Preferred Alternative in the FEIS.</p>	<p>L-2-6 FEIS Chapter 10, <i>Public Services and Utilities</i>, references PSE's Integrated Resource Plan.</p> <p>L-2-7 See Common Response 13 Growth Targets. The City looks forward to coordinating with PSE in planning for future populations.</p> <p>L-2-8 The EIS analyses the impacts broadly under a buildout scenario. It is not expected that buildout will be achieved by 2044. The broad impacts to electrical facilities can be found in DEIS Chapter 10, <i>Public Services and Utilities</i>. The city looks forward to working with PSE to plan for electrical service to meet the needs relative to the 2044 growth targets.</p> <p>L-2-9 See Common Response 14 Equity and Environmental Sustainability Metrics.</p>
L-2-7	<p>Chapter 5. Population and Employment The DEIS aptly addresses the methodologies for population, housing and employment forecasts. It will be helpful to ensure that the City and PSE are utilizing similar data to address utility impacts for the Preferred Alternative in the FEIS and the 2024-2044 Comprehensive Plan.</p>	
L-2-8	<p>Chapter 6. Aesthetics While the DEIS is considered to be a programmatic (non-project) action, all of the Action Alternatives will necessitate the construction of new and/or upgraded infrastructure to meet the demands of growth. PSE understands that when proposed, these new and/or upgraded facilities will identify project related impacts and mitigations measures through a separate process. We believe that the DEIS could identify in broad terms the overall potential impacts to all facilities and services.</p>	
L-2-9	<p>With an increased focus to examine infrastructure decisions through an equity based lens, the City's existing goal to preserve "neighborhood character" can at times reinforce the imbalanced placement of facilities and potential impacts to areas of the City not deemed "residential character neighborhoods," which typically correlates with multifamily and multipurpose zones, where lower income communities are often located. PSE looks forward to working with the City to shift land use practices away from utility placement decisions prioritizing character compatibility, and instead based primarily on service level demand, and their equitable distribution.</p>	

L-2

COMMENT

RESPONSE

Reilly Pittman, City of Bellevue
 June 12, 2023
 Page Four

L-2-10

Chapter 7. Housing
 The City's DEIS presents numerous strategies to implement new requirements to address immediate housing challenges as well as those anticipated over the planning horizon. With the requirement to transition away from fossil fuel energies, PSE will continue to be engaged with development code amendments that increase electrification of heating and cooling systems in residential and other building uses. This includes the addition of new and/or upgraded energy facilities such as electric vehicle charging facilities; battery storage facilities, solar facilities, and other Distributed Energy technologies.

L-2-10 Comment noted.

L-2-11 The city can choose to implement the mitigation measures in DEIS Chapter 8, *Air Quality*, and the recommendations in DEIS Appendix J. The location of the recommendation in the FEIS does not make it more or less likely that the city will take that action. The city may, but is not required to, incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

L-2-11

Chapter 8. Air Quality
 With the continued transformation away from vehicles which use fossil fuel combustion engines to those that use electrical/battery engines, the DEIS should better address the potential for improved air quality over the planning horizon. We also suggest that some of the information outlined in Appendix J - Air Quality and Land Use Planning be integrated into Chapter 8.

L-2-12 Comment noted. See Common Response 6 Noise.

L-2-13 FEIS Chapter 10, *Public Services and Utilities*, has been revised to directly refer to Puget Sound Energy as a non-city owned utility and to reference PSE's Integrated Resource Plan.

L-2-12

Chapter 9. Noise
 The DEIS sufficiently addresses the potential noise impacts under the Action Alternatives. Any potential noise impacts from PSE's electric and natural gas facilities will be addressed at the project level application and will be regulated through city, state and federal requirements.

L-2-14 See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

L-2-13

Chapter 10. Public Services and Utilities
 As mentioned above, the DEIS identifies potential impacts to public service and utilities especially city owned facilities. PSE encourages the City to include more discussion about other non-city owned services especially since the DEIS states, "Non-city utility providers will also experience increased demand for services and will need to plan for new or improved facilities". PSE has well-established processes for planning and constructing its electric and natural gas facilities (e.g., IRP). One component of PSE's planning involves referring to local government comprehensive plans including potential land use and zoning densities.

L-2-14

Chapter 11. Transportation
 The DEIS provides a comprehensive analysis of the Action Alternatives and the potential impacts to traditional types/modes of transportation facilities and services. Where applicable, these transportation impacts should also address the electrification of the transportation system including the network of charging infrastructure to support it. While the City has referred to the electrification of its fleet, there does not appear to be much analysis or mitigation measures for citywide transportation electrification whether located on public or private property.

L-2

COMMENT

RESPONSE

Reilly Pittman, City of Bellevue
June 12, 2023
Page Five

L-2-15

Will the City's Transportation Demand Management (TDM) Strategies include transportation electrification in the update to the 2015 Plan?

L-2-15

The Comprehensive Plan was amended in 2022 to modify a policy regarding the inclusion of electric vehicle charging stations. The FEIS does not mention transportation electrification as a mitigation measure because the city is not responsible for the decisions of individuals traveling through the city. However, actions like the inclusion of electric vehicle charging stations in development review are steps the city can take to support the transition to electric vehicles.

L-2-16

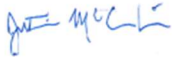
Chapter 12. Cumulative Impacts
The DEIS has considered several direct, indirect and cumulative impacts of the Action Alternatives. Again, PSE proposes working with the City to recognize potential cumulative impacts to the electric and natural gas systems in the FEIS and 2044 Comprehensive Plan.

L-2-16

The city looks forward to coordinating with PSE on planning for the Comprehensive Plan.

PSE would like to thank the City for the opportunity to provide comments throughout the update process. Should there be any questions or information that we can provide to assist the City, please do not hesitate to contact me at (206) 517-3432 or at justin.mcconachie@pse.com.

Sincerely,



Senior Municipal Liaison Manager
Puget Sound Energy

Cc: Elizabeth Stead, City of Bellevue
Thara Johnson, City of Bellevue
Matt Larson, PSE

M-1


COMMENT

RESPONSE


Public Comment Meeting

In re: City of Bellevue's Comprehensive Plan Update

May 18, 2023



206.287.9066 | 800.846.6989
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email: info@buellrealtime.com



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CITY OF BELLEVUE

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

VIRTUAL PUBLIC MEETING
PUBLIC COMMENT PERIOD

Taken via Zoom Videoconference

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

REPORTED BY: Sierra Zanghi RSR, CCR 22004202

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1 REMOTE; THURSDAY, MAY 18, 2023
2 6:00 P.M.
3 --oOo--
4 KRISTIN ANDERSON: We are now moving, as
5 Thara said, to the public comment period. You're
6 invited to provide comments on the EIS alternatives and
7 policies and how they best reflect the City of
8 Bellevue's needs, accuracy of information in the DEIS,
9 assumptions used in the environmental analysis, where
10 clarification is needed, and potential impacts and
11 mitigation.
12 Next slide, please. So this is how
13 we'll do things tonight. Some of you have
14 preregistered when you registered for the meeting to
15 give comments tonight. And we'll start with that group
16 of people.
17 You'll log in. I will call your name
18 and the names of the next two people in line to provide
19 comment. You can look for a notification that will
20 look like this one that's shown here on the screen to
21 unmute yourself. You won't be on camera. And when you
22 start, please first state your full name and physical
23 address, and then you'll have three minutes to speak,
24 after which you'll be muted and we'll go on to the next
25 person. And a reminder that we have a court reporter

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

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

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

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

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

22 So Clifford Cawthon?

23 CLIFFORD CAWTHON: Yes.

24 KRISTIN ANDERSON: Yes. Great.

25 CLIFFORD CAWTHON: Thank you for

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1 allowing me to speak here tonight.
 2 I just wanted to express -- so I'm the
 3 advocacy and policy manager for Habitat for Humanity in
 4 Seattle and King and Kittitas Counties, and we've been
 5 working alongside the great staff at the City of
 6 Bellevue, as well as a number of community members, to
 7 provide input during the process.
 8 And I just want to say that we see that
 9 there is a bright future ahead, and that Alternative 3
 10 puts us on a path to get there. But we can go even
 11 further.
 12 While Alternative 3 incorporates a
 13 number of principles, having affordability tools in the
 14 process such as inclusionary zoning mechanisms
 15 throughout the city to ensure that affordable units get
 16 made, as well as making sure that policy is right-sized
 17 so we can actually build the kind of affordable housing
 18 that our community desperately needs is essential.
 19 So I just want to contribute that
 20 perspective. And particularly when it comes to
 21 impact -- yes, when it comes to impact, to recognize
 22 that when we talk about equity, particularly racial
 23 equity in thinking of economic inequality, that we
 24 remember that the kind of exclusionary zoning --
 25 patterns of exclusionary zoning were very much a part

M-1-1

M-1-2

M-1-3

M-1-1 Comment noted.

M-1-2 Comment noted. The DEIS includes three action alternatives that analyze inclusionary affordability tools and increased incentives across the city to encourage more affordable housing at a range of income levels. The FEIS provides further analysis on the Preferred Alternative and mandatory and voluntary inclusionary housing affordability tools. See Common Response 4 Housing Alternatives.

M-1-3 See Common Response 14 Equity and Environmental Sustainability Metrics.

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

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

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

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

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

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

24 T. J. Woosley?

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

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M-1-3

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

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

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

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

M-1-4 Comment noted.

M-1-5 Comment noted.

M-1-6 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

M-1-4

M-1-5

M-1-6

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

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

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

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

21 Next up, Stanley Xu.

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

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1 your family or who uses the computer.
2 Is there -- let me -- I'm just going to
3 look -- I want to make sure Todd Stabler or Stanley Xu,
4 if there are other names or if you think you're
5 misrepresented, like your nameplate is different in
6 what you're seeing at the bottom of your -- the square
7 where you're showing up, but you're -- okay. I wanted
8 to just give that opportunity just in case. And if
9 just -- yeah. Okay. All right.
10 Well, right now, we'd like to open the
11 floor to folks if they didn't preregister and haven't
12 commented already but would like to comment tonight.
13 Okay. Jacquie Quarre. And remember,
14 you can unmute yourself and then state your first
15 name -- your full name, excuse me, and your full
16 address.
17 JACQUIE QUARRE: Okay, thank you. This
18 is Jacquie Quarre, and my address is 285 Southeast 10th
19 Circle in North Bend, Washington. We spend a lot of
20 time in Bellevue and are working with property owners
21 in Bellevue.
22 I'm a land use attorney. I work for
23 Tharsis Law, and wanted to thank staff for all of their
24 work that's gone into this process. We've been
25 participating and tracking along the way and really

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M-1-7 See Common Response 19 Zoning Details.

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

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

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

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

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

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

25 I just -- I really like these plans.

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M-1-7

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M-1-8 Comment noted.

M-1-9 The DEIS includes three action alternatives that analyze inclusionary affordability tools and increased incentives across the city to encourage more affordable housing at a range of income levels. The FEIS provides further analysis on the preferred alternative and mandatory and voluntary inclusionary housing affordability tools. See Common Response 4 Housing Alternatives.

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M-1-8

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

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

M-1-9

11 And that's all.

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

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

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

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

M-1

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M-1-10 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

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

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

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

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

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M-1-10

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M-1-11 Comment noted.

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

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

15 Thank you.

16 KRISTIN ANDERSON: Thank you.

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

19 STANLEY XU: Yes, I'm here.

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

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

M-1-10

M-1-11

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M-1-12 See Common Response 4 Housing Alternatives.

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M-1-11

1 the most density for the housing units.

M-1-12

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

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

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

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

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

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

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1 the kind of official comment period.
 2 T. J. WOOSLEY: Thank you.
 3 KRISTIN ANDERSON: All right, I'll pause
 4 just momentarily, see if anyone else would like to
 5 provide -- give public comment tonight. We have plenty
 6 of time. Looks like Phyllis White.
 7 So, Phyllis, let's see. We can -- are
 8 you able to unmute yourself? Is it working? All
 9 right, we're working on it, Phyllis. Oh, no. Did we
 10 lose Phyllis? Oh, no.
 11 All right, Phyllis, if you change your
 12 mind -- it looks like your hand went down. I want to
 13 make sure that wasn't an accident. Technology can be
 14 finicky. Oh, good -- Phyllis. I see your hand is
 15 raised. Let's see if we can come up with a way to --
 16 looks like there's -- you're having trouble or we're
 17 having trouble on our end unmuting you. Give us just a
 18 minute, we're working on it.
 19 Okay. Well, we -- Phyllis?
 20 PHYLLIS WHITE: Can you hear me?
 21 KRISTIN ANDERSON: Yes. Are you -- it's
 22 coming through "Lime White." Is that you, Phyllis?
 23 PHYLLIS WHITE: Yes, that's me.
 24 KRISTIN ANDERSON: Okay. I'm hearing a
 25 little bit of an echo, so I don't know, if you're

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

4 PHYLLIS WHITE: Hold on.

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

7 PHYLLIS WHITE: Okay. Can you hear me?

8 KRISTIN ANDERSON: Yes. There we go.

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

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

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

25 We don't have sidewalks. Our streets

M-1-13

M-1-14

M-1-15

M-1-13 See Common Response 2 Tree Canopy. See Common Response 16 Critical Areas.

M-1-14 See Common Response 4 Housing Alternatives.

M-1-15 The Bellevue Mobility Implementation Plan provides for sidewalks on both sides of all arterial streets. Within neighborhoods on local streets, programs such as the Neighborhood Sidewalk Program and Neighborhood Enhancement can provide funding for missing sidewalk segments, with neighborhood support.

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

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

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

14 KRISTIN ANDERSON: Thank you.

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

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

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

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

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M-1-15

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M-1-16 DEIS Chapter 10, *Public Services and Utilities*, discusses police protection in the city.

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1 full name. Sorry.

2 KRISTIN ANDERSON: No problem.

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

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

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

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

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

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1 KRISTIN ANDERSON: Jasper. Thank you.

2 JASPER LEE: Sorry about that.

3 KRISTIN ANDERSON: No problem.

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

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

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

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

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

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M-1

COMMENT

RESPONSE

M-1-17 See DEIS Chapter 5, *Population and Employment*, for statistics on the current population of Wilburton. See DEIS Chapter 10, *Public Services and Utilities*, for information on potential impacts to schools and water and sewage systems. See Common Response 2 Tree Canopy.

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1 beautiful evening with the team here, listening and
2 providing comment.
3 JULIE BEFFA: Thank you.
4 KRISTIN ANDERSON: If you're still here,
5 we've also provided a link to where you can provide
6 your comments online in the chat. And you can click on
7 that link.
8 I am still noticing that we have quite a
9 few participants in the meeting. I would just remind
10 you that this does conclude the evening for us unless
11 someone would like to provide public comment.
12 Looks like we have a hand raised. Can
13 we go back up to the timer slide? Thank you. Steve
14 Williams?
15 STEVE WILLIAMS: Yes. Can you hear me?
16 KRISTIN ANDERSON: Yes.
17 STEVE WILLIAMS: My name is Steve
18 Williams. We live in the Wilburton area just above the
19 International School.
20 I'm new to this and really hadn't done
21 much research, but the first thing that occurs to me is
22 what is the current population of the Wilburton area?
23 And when we're talking about these alternatives, what
24 sort of a percentage increase is that? Are we doubling
25 the population? And what's the impact of that on our

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M-1-17

M-1

COMMENT

RESPONSE

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M-1-17 |

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

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

M-1-18 |

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

M-1-19 |

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

M-1-20 |

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

M-1-18 Open space requirements and landscape standards for future development will be considered in development of land use code amendments. See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space.

M-1-19 See DEIS Appendix G, *Relationship of Climate Change Vulnerability to the Alternatives*, for more information on steps the city can take to address energy conservation.

M-1-20 See Common Response 4 Housing Alternatives. See Common Response 11 Impact of COVID-19.

M-1

COMMENT

RESPONSE

M-1-21 See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.

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1 town to get services.

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

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

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

18 KRISTIN ANDERSON: Thank you.

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

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

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M-1-20

M-1-21

M-1

COMMENT

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

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

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

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

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

14 --oOo--

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COMMENT

RESPONSE

Public Comment Period - Day 3


In re: City of Bellevue's Comprehensive Plan Update

June 1, 2023



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COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

Page 1

CITY OF BELLEVUE

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

PUBLIC MEETING
PUBLIC COMMENT PORTION

Taken at Bellevue City Hall
450 110th Avenue Northeast
Bellevue, Washington 98004

DATE TAKEN: June 1, 2023, at 6:00 p.m.
REPORTED BY: Sierra Zanghi RSR, CCR 22004202

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COMMENT

RESPONSE

M-2-1 See Common Response 14 Equity and Environmental Sustainability Metrics.

M-2-2 See Common Response 4 Housing Alternatives.

Public Comment Period - Day 3 - 6/1/2023

Page 2

1 BELLEVUE, WASHINGTON
 2 THURSDAY, JUNE 1, 2023
 3 6:00 P.M.
 4 --oOo--
 5 JIM LAUNER: Good evening. My name is
 6 Jim Lauinger, L-a-u-i-n-g-e-r. I live at 202 118th
 7 Avenue Southeast, Apartment C-12, in the Wilburton area
 8 of Bellevue, 98004.
 9 I come to you with a statement relative
 10 to my work with BDAN. I'm a member of the Bellevue
 11 Diversity Advisory committee. And when we start
 12 talking about increasing housing and affordable
 13 housing, I want to remind you that as we look at making
 14 Bellevue an equitable place to live in, much of that
 15 has to do with making sure that we have affordable
 16 housing for everybody. Everybody can belong. If it's
 17 not, then a lot of people cannot belong and live in
 18 Bellevue. Right now, 89 percent of the people that
 19 live in Bellevue commute; so that's kind of a
 20 frightening statistic to be looking at.
 21 From another committee that I sit on,
 22 the ARCH, affordable housing committee, we're looking
 23 at a lot of plans relative to helping Bellevue and
 24 other cities with affordable housing. If Bellevue is
 25 going to make its affordable housing goals -- the

M-2-1

M-2-2

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M-2

COMMENT

RESPONSE

M-2-3 See Common Response 4 Housing Alternatives.

M-2-4 Comment noted.

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M-2-2

1 housing goal is 35,000; the affordable portion at 50
2 percent and below AMI is 10,400 units. If we're going
3 to be able to do that, I strongly urge that you make
4 your housing policies, choose which one or two can
5 certainly be mandatory rather than voluntary on the
6 part of developers. This is going to be critical.

M-2-3

7 If Redmond can do it, and they did it
8 about two decades ago with their inclusionary zoning
9 and have built about 600 apartments -- affordable
10 apartments in downtown Redmond; and if Kirkland can
11 more recently do it with their, I believe, multifamily
12 tax incentive; then Bellevue can certainly do it. And
13 that is the key to making sure you make your affordable
14 targets in the next number of years.

M-2-4

15 I saw an old quote from a plan. I don't
16 know how old it is. It might go back to before 2000.
17 But it mentioned that Bellevue's MFTE program -- this
18 is made by Bellevue -- has not produced any units of
19 affordable housing in that period of time. So if it
20 didn't back then, it probably still hasn't. Thank you
21 for listening.

22 ALEX ZIMMERMAN: My name is Alex
23 Zimmerman, and I'm candidate for Bellevue Council
24 position No. 3. You can start.
25 "Sieg Heil," Nazi pig. What is you

M-2

COMMENT

RESPONSE

M-2-5 Comment noted.

Public Comment Period - Day 3 - 6/1/2023

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1 doing? It's exactly what I told you first time in '96
2 when Microsoft come. I told you only freaking idiot
3 can open factory with 50,000 people. And this exactly
4 happened. Well, we destroy it totally.

5 But what is you doing? This only smell
6 like a Nazi Gestapo principle. Why we cannot talking
7 together? You separate because you don't want people
8 to listen one to another, make a discussion. You are
9 real Nazi pig. And I go to council chambers all over,
10 speak more than 3,000 times. I speak right now, every
11 week, approximately 10 to 15 times everywhere. It's
12 exactly what is you doing: You separate people.

13 You, by definition, are bandito, are
14 mafia. That's exactly who you are. Why we cannot
15 speak together? It's a room with 100 people who
16 interest in making discussion. Somebody can talking
17 for three minutes, somebody can have different opinion.
18 You are Nazi pig -- Nazi, Nazi, Nazi pig.

19 So situation, what we have right now, is
20 simple: Dirty government with absolutely Democrat Nazi
21 psychopath council in Amazon bandito. You know what
22 this means? There's three companies who want to
23 control us. This is the point.

24 But as I talk many time everywhere, and
25 exactly in Bellevue because I am candidate right now:

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M-2-5

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RESPONSE

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M-2-5

1 Go more money, more money, more money. This three
2 group of crooks -- you know, what this means? -- a
3 bandito, a mafia, a Nazi pig -- have only one goal.
4 Make money from us.

M-2-6

5 Who pay for this? Who pay for traffic?
6 Who pay for housing? Who pay for service? We pay.
7 Low-income pay for this. People who make less than
8 \$50,000. We all move out for another three year when
9 Amazon brings this year start bringing 30,000 slave
10 from jungle. You know what this means? Bellevue right
11 now a nightmare.

M-2-7

12 And I live here very long and talk about
13 this a thousand times. And nobody listen to me because
14 by definition you are bandit, you are mafia, you are
15 criminal. You understand what this mean? You destroy
16 America. You destroy people. You destroy people's
17 life. It's exactly what's happened.

M-2-8

18 A hundred thousand -- Amazons brings us
19 30,000. A hundred thousand low-income people will be
20 moved out from Bellevue. They cannot afford.
21 80 percentage from what? From \$150,000? So you give a
22 good apartment to people who make 100, 120 grand? This
23 exactly 80 percentage? How about people like me who
24 have only social security? And another 50,000 people
25 who very, very low income: Disabled senior citizens,

M-2-6 Comment noted.

M-2-7 Comment noted.

M-2-8 See Common Response 4 Housing Alternatives.

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

Page 6

M-2-8

1 people who make \$15 per hour.

M-2-9

2 What's happening, Nazi fucking pig?

3 CHRISTOPHER RANDELS: My name is

4 Christopher Randels. I live at 2501 148th Avenue

5 Southeast, Apartment C-5, Bellevue, Washington 98007.

6 Okay. Awesome. And I just want to make

7 clear that I'm commenting in a personal capacity

8 tonight, just a personal resident, and wanted to

9 express my strong support for Alternative 3.

10 I attended the pride ceremony celebration

11 today at City Hall, and we were talking about the

M-2-10

12 sweeping anti-trans, anti-gay legislation that's being

13 passed around the country. And thinking about how

14 there's attacks on civil rights, attacks on queer

15 rights, attacks on women's rights.

16 Thinking about how, with climate change

17 happening, we're actually one of the areas that is

18 slated to undergo the least dramatic effects from

M-2-11

19 climate change, it feels like a moral imperative that

20 we really need to grow as much as we can to make as

21 much space for as many neighbors as we can, because

22 people are going to be coming here.

M-2-12

23 And really, my comments are just to make

24 Alternative 3 better, in my view: One, just do want to

25 make sure that the final EIS incorporates state

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M-2-9 Comment noted.

M-2-10 Comment noted.

M-2-11 See Common Response 4 Housing Alternatives. See Common Response 15 Climate Change and State Planning Framework.

M-2-12 Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis of environmental impacts related to HB 1110 and HB 1337.

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

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M-2-12

1 legislation HB 1110 and 1337.
2 Also just want to provide the comment that
3 all missing middle housing typologies should be allowed
4 in all neighborhoods. Please don't do the 75-percent
5 threshold thing, or if you meet the 75-percent

M-2-13

6 threshold, you meet the conditions of 1110. Don't do
7 that, because that's not equitable. That's just going
8 to create some neighborhoods that have middle housing
9 and some that don't, and that doesn't line up with the
10 City's equity goals.

11 Additionally, I would say that the City
12 should be really proactive with TOD development and how
13 that relates to frequent transit service via buses.

M-2-14

14 As mentioned, I live in -- oh, I guess I
15 haven't mentioned that yet. I live in the neighborhood
16 of Lake Hills. I've lived there for eight years.
17 There is extremely frequent transit service there. I
18 would say it's the most frequent transit service in
19 Bellevue outside of downtown. I use it all the time.
20 It's really great. It could be better, but it's good.

M-2-15

21 But Alternative 3, the land use map still
22 only has us going to low residential, and I think
23 there's room to really up that a bit to get to mixed
24 use or even higher residential capacities. There's
25 poll data out there that exists that shows that a

M-2-13 See Common Response 14 Equity and Environmental Sustainability Metrics.

M-2-14 Bellevue works with transit service providers, King County Metro and Sound Transit, to ensure Bellevue residents have access to transit.

M-2-15 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

M-2

COMMENT

RESPONSE

M-2-16 See Common Response 19 Zoning Details.

M-2-17 Comment noted.

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M-2-15

1 majority of Bellevue residents would support mixed-use
 2 development -- more mixed-use development near frequent
 3 transit, and I think Lake Hills is very primed for
 4 that. So would really encourage that be evaluated
 5 further for Alternative 3.

M-2-16

6 And finally, I would push the City evaluate
 7 opportunities for small-scale commercial space,
 8 thinking about a garage business. So for example,
 9 small doctors' offices, small bars or cafes or corner
 10 stores. Allowing these in all of our residential area
 11 creates that really 15-minute city, that 15-minute
 12 neighborhood, and enables more people to access their
 13 daily needs within walking and biking distance. So
 14 would want that evaluated more.

M-2-17

15 CLIFF CAWTHON: So my name is Cliff
 16 Cawthon. I'm the advocacy and policy manager for
 17 Habitat for Humanity in Seattle, King and Kittitas
 18 Counties. We're located in Renton. I personally live
 19 in Kent and actually work in Bellevue part-time as a
 20 teacher at Bellevue College. So both, you know, doing
 21 the Millennial thing, full-time and part-time gig.
 22 But I say all that to say that I've
 23 testified several times in front of the planning
 24 commission, in front of -- sorry, Bellevue City
 25 Council, and at these public meetings. So I've stated

M-2

COMMENT

RESPONSE

M-2-18 See Common Response 4 Housing Alternatives.

M-2-19 See Common Response 2 Tree Canopy. See Common Response 4 Housing Alternatives.

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M-2-17

1 our position before. But one thing I want to state is
2 that as the DEIS process is starting to turn a corner
3 that Alternative 3 really is the greatest -- holds the
4 greatest potential to produce more affordable housing
5 and really leverage the kind of value that is coming
6 from the kind of economic growth that we see in
7 Bellevue.

M-2-18

8 89 percent of the workforce, myself
9 included, doesn't live here. As I teach at Bellevue
10 College online, or if I were to even teach in person, I
11 have no economically feasible way of living here in
12 Bellevue, and neither do many of my colleagues that
13 live either on the Eastside, in Kirkland or Redmond, or
14 as far away as Newcastle or Renton, or they live in
15 south King County alongside myself. And that's not
16 sustainable in order to really continue the kind of
17 economic growth that Bellevue has seen.

M-2-19

18 And I've heard so many residents talk
19 about the environmental impact that they are concerned
20 about when it comes to tree conservation, when it comes
21 to energy use, and all various types of ecological
22 impact. And utilizing middle housing types and really
23 leaning into exploring ways to leverage density and
24 leverage neighborhood centers, mixed-use centers to be
25 able to build affordable housing so people can live in

M-2

COMMENT

RESPONSE

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M-2-19

1 15-minute neighborhoods, is the best
2 ecologically-conscious strategy to address growth.

M-2-20

3 And then last but not least, you know,
4 one of the things I want to applaud but also highlight
5 is the City's commitment to racial equity. And we know
6 Bellevue has had a history dealing with exclusion. And
7 the best way to address the mistakes of past is to
8 chart a really intentional future, and that means
9 having a diversity of different housing types,
10 including affordable home ownership opportunities, in
11 order to address those kind of exclusionary policies of
12 the past.

M-2-21

13 So I'm grateful to the staff for really
14 pushing this process forward and for their hard work,
15 as well as the City. And I would encourage the City to
16 really lean into this, for the FEIS (sic) to focus on
17 Alternative 3, and to keep it pushing forward. Thank
18 you.

M-2-22

19 RICHARD HUGHES: So my name is Richard
20 Hughes, 13709 Northeast 48th Place, Bellevue 98005 in
21 the Bridle Trails neighborhood.

22 Okay, three points. One, I'm concerned
23 that the DEIS does not consider the impact of the
24 recently passed House Bill 1110. The impact of this is
25 not yet known. It's only just passed into law. The

M-2-20 See Common Response 14 Equity and Environmental Sustainability Metrics.

M-2-21 Comment noted.

M-2-22 Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis of environmental impacts related to HB 1110.

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

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M-2-22

1 comment time of June the 12th is perilously close.
2 More time is now needed for the City to assess the
3 impact of HB 1110 in DEIS Alternatives 0 to 3.

M-2-23

4 As the DEIS is written today,
5 Alternative 0 would need to be completely rewritten. A
6 new DEIS is needed so residents can review and comment
7 on the current reality rather than how things used to
8 be.

M-2-24

9 Two, I'm concerned that DEIS does not
10 fully consider the impact of the COVID pandemic on work
11 patterns and locations. Many tech staff left their
12 offices to work from home. Some have now returned to
13 their offices part-time, yet others remain working from
14 home, and yet others have moved out of the City to
15 Eastern Washington.

M-2-25

16 We do not currently know what the future
17 of remote versus office work will be. We do not know
18 how many offices and homes will be needed in Bellevue.
19 Three, the City proposes to update the
20 tree code this year. Bridle Trails already has a
21 stronger tree code, yet significant and landmark trees
22 are cut down, sometimes on a weekend, as houses are
23 torn down and rebuilt on larger footprints. The DEIS
24 needs to be rewritten to consider the updated tree
25 code.

M-2-23 As described in DEIS Chapter 2, *Alternatives*, the No Action Alternatives assumes continuation of the current Comprehensive Plan, while the three Action Alternatives are based on variations of housing and job capacities, distribution throughout the city, and implementation of new policies.

M-2-24 See Common Response 11 Impact of COVID 19.

M-2-25 See Common Response 2 Tree Canopy.

M-2

COMMENT

RESPONSE

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1 I'm especially concerned, from where I
 2 live, about how the removal of large trees will impact
 3 the wildlife in Bridle Trails. I live a five-minute
 4 walk from the Bridle Trails State Park and have seen
 5 deer, bobcats, bear -- I've heard of the bear -- barred
 6 owls, bald eagles, coyotes, raccoons, and numerous
 7 other birds in my yard and using the trails surrounding
 8 my yard. I'm aware of cougar sightings in the state
 9 park.

10 I've also heard the park rangers say
 11 that the state park is, quote, "a perfectly balanced
 12 ecosystem." Does the DEIS rigorously address what will
 13 happen to the wildlife and trees when you permit
 14 greater development in Bridle Trails? Bridle Trails is
 15 currently considered a rural neighborhood by the City.
 16 Where would the wildlife go when you cut down their
 17 homes? Have you studied the impact of noise on
 18 wildlife?

19 The DEIS needs to be rewritten to
 20 rigorously consider the impact on the state park and
 21 the entirety of Bridle Trails.

22 DON MARSH: I'm Don Marsh. I live at
 23 4411 137th Avenue Southeast.

24 Good evening. My name is Don Marsh, and
 25 I am speaking tonight on behalf of the nonprofit

M-2-26 The impact of the alternatives on Bridle Trails State Park is outside of the scope of the EIS. See Common Response 2 Tree Canopy. See Common Response 9 Plants and Animals.

M-2-27 See Common Response 2 Tree Canopy.

M-2-26

M-2-27

M-2

COMMENT

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1 organization 300 Trees, which I founded to distribute
2 thousands of free native trees to Bellevue residents,
3 schools, houses of worship, and small businesses.

4 I recently served on the Bellevue 2044
5 strategy team, providing input regarding the
6 comprehensive plan update.

7 We commend Bellevue for its effort to
8 thoughtfully address our city's housing and traffic
9 challenges through the comp plan update. However,
10 given the importance of Bellevue's urban tree canopy in
11 maintaining the health of residents and the ecosystem,
12 the beauty of our city in a park, the mitigation of
13 climate issues such as summer heat islands and winter
14 flood risk, we must ask why the DEIS avoids any
15 quantitative analysis of tree canopy impacts?

16 It seems obvious that the different
17 growth alternatives described in the DEIS would have
18 varying impacts on the tree canopy.

19 For example, increasing the zoning
20 density in parts of Cougar Mountain or Bridle Trails,
21 as envisioned in at least one of the alternatives,
22 would require removal of hundreds or thousands of
23 trees. That might be a sacrifice we are willing to
24 make to achieve other goals, but without a shred of
25 information about the trade-offs, the DEIS leaves us

M-2-27

M-2

COMMENT

RESPONSE

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1 blind in an area that most Bellevue residents care
2 deeply about.

3 The DEIS evaluates the alternatives' impacts
4 related to land use compatibility, air quality, noise,
5 and aesthetics. The document concludes that these
6 impacts would be similar for each of the alternatives;
7 however, each of these metrics would be impacted by the
8 tree canopy and therefor some alternatives might be
9 more attractive than others if a credible analysis of
10 tree canopy is done.

11 We ask that tree canopy impacts be considered
12 in the final EIS or a supplemental EIS. For the sake
13 of our city and future generations, we need to have a
14 unifying vision regarding the importance of a healthy
15 tree canopy and a shared understanding of what kind of
16 tradeoffs will be allowed between trees and
17 development.

18 If too many trees are removed, it's not just
19 trees that would be harmed; the quality of our lives
20 and the lives of our kids and grandkids would also be
21 diminished. Thank you.

22 JOHN DARVISH: My name is John Darvish.
23 I live in 7835 Southeast 42nd Street in Mercer Island,
24 98040.

25 Hi. My name is John Darvish, and I'm

M-2-27

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

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1 here to speak to the three alternatives that the
2 committee has determined. I want to express my support
3 for the Alternative 3 with respect to Wilburton area.
4 I can only speak to that because that's been the area
5 of interest for me.

6 We have owned a business and have owned
7 a property in the area that's under consideration for
8 the past 20-plus years, and we have been following this
9 development very closely. And I can tell you that we
10 are all really excited about the possibilities that it
11 will create.

12 One of the things that I think it would
13 add to the life of the residents of Bellevue is to be
14 able to gather together in an environment and meet and
15 greet with each other. And I think this alternative
16 would create that, concentrating the residential
17 around the TOD would be an amazing opportunity for
18 people to get to know each other as well as creating a
19 community in Bellevue.

20 I think by allowing the mixed-use area,
21 extending it all the way to north Bel-Red Road, I think
22 we may lose some medical office buildings in that area,
23 but I think we can supplement that by looking at the
24 area that's north of Bel-Red, on 116th, and to see how
25 we can up-zone that area to create some more dense

M-2-28 Comment noted.

M-2-29 The Preferred Alternative studied in the FEIS continued medical focused future land use in the area described.

M-2-28

M-2-29

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

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M-2-29

1 medical office buildings there.

2 I think that's about all I have. I just
3 didn't really prepare for anything, but I think that's
4 all I have. Thank you so much.

5 KATE SAYERS: Kate Sayers, 832 170th
6 Place Northeast, Bellevue 98008.

M-2-30

7 All right. My question is, number one,
8 do the assumptions about 70,000 new workers in Bellevue
9 still hold, given what's happening with COVID?

M-2-31

10 Why aren't there more variable heights
11 in the EIS around Wilburton rather than making
12 everything standard throughout the thing? I would like
13 to see tall buildings, low buildings, and everything
14 mixed up.

M-2-32

15 I would like to see stacked housing for
16 people so that there are no stairs for seniors.

M-2-33

17 I would like to see a driverless train
18 connecting the area with that area in Wilburton but
19 also with downtown.

M-2-34

20 I would like them to buy the Tech Center
21 so we can use that for housing and keep the park as-is.

M-2-35

22 I would like the City to develop an
23 ownership and equity program so low-income people can
24 buy housing and develop equity.

M-2-36

25 I would like to see more multiuse around

M-2-30 See Common Response 11 Impact of COVID-19. The Comprehensive Plan is a document that plans for long term growth. The city acknowledges that there are business cycles, and that employment will fluctuate over the 20-year planning time frame. However, the 70,000 new jobs remains the job target that Bellevue must plan for and accommodate under the King County Planning Policies.

M-2-31 The three Action Alternatives analyzed in the DEIS consider a variety of building heights ranging from 7 to approximately 45 stories in height. The Preferred Alternative analyzed in the FEIS also considers this range of building heights within the Wilburton study area.

M-2-32 Comment noted.

M-2-33 See FEIS Chapter 11, *Transportation*, for suggested mitigation measures. A driverless train is not among the suggested mitigation measures, but your idea is noted.

M-2-34 Comment noted. See Common Response 1 Non Project vs. Project Level SEPA Review.

M-2-35 Comment noted.

M-2-36 Development under all alternatives will result in additional development activity citywide. The Comprehensive Plan Periodic Update will include policies that support mixed uses and higher-density development in Mixed Use Centers and Neighborhood Centers.

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

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M-2-36 |

1 schools, six-story apartments, et cetera.

M-2-37 |

2 I would like the area around Somerset
3 and Bridle Trails to have more density. Specifically,
4 I'd like red density coming down Highland Drive, and
5 I'd like transit added there.

M-2-38 |

6 I want to make sure that all trees are
7 protected.

M-2-39 |

8 I don't see density as being put in
9 high-income areas, and I think that's a big disservice
10 to normal people.

M-2-40 |

11 I would like the City of Bellevue to
12 insist that all City workers live in the city and pay
13 them enough so that they can.

M-2-41 |

14 I think the land density use is not
15 appropriate. And given that we're all going to have
16 ADUs, I'd like to see a more bold and less boring
17 practice.

M-2-42 |

18 I'd like to see tall housing around the
19 golf course and around some of the other parks we have
20 in the city.

M-2-43 |

21 I'd like to make sure that COVID has not
22 changed the work patterns entirely so that we have
23 livable areas that are smaller where people who are
24 working from home can go.

M-2-44 |

25 I would like to see more rezoning,

M-2-37 Comment noted.

M-2-38 See Common Response 2 Tree Canopy.

M-2-39 Comment noted. This is outside the scope of the EIS.

M-2-40 Comment noted. This is outside the scope of the EIS.

M-2-41 Comment noted.

M-2-42 Comment noted.

M-2-43 See Common Response 11 Impact of COVID-19.

M-2-44 See Common Response 19 Zoning Details.

M-2

COMMENT

RESPONSE

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Page 18

M-2-44

1 especially around the well-served housing areas.

M-2-45

2 I'd like to see mandatory housing in any
3 building that is an employer building. I'd like to see
4 those apartments made to be bought so that people can
5 have equity, and that every building that we have in
6 downtown Seattle has housing for low-income people that
7 they own.

M-2-46

8 Oh, one more comment. I don't think the
9 City program is bold enough. I think it's more of the
10 same old claptrap. I don't think they're innovative or
11 creative, and I think they need to rethink this whole
12 thing.

M-2-47

13 WALTER SCOTT: My name is Walter Scott.
14 My address is 400 112th Avenue Northeast,
15 Suite No. 230, Bellevue, Washington 98004.

16 I am in the commercial real estate
17 business. We have two properties that are relevant in
18 this case. One is five acres across the street from
19 Bellevue City Hall between 6th and 4th Street, along
20 the freeway, along the west side of the freeway. And
21 our second property actually has more relevance to
22 Wilburton because it's in Wilburton, and it's across
23 the street from Overlake Hospital. It's also five
24 acres.

25 And my comments are not necessarily

M-2-45 See Common Response 4 Housing Alternatives. See Common Response 14 Equity and Environmental Sustainability Metrics.

M-2-46 Comment noted.

M-2-47 Comment noted.

M-2

COMMENT

RESPONSE

M-2-48 See Common Response 19 Zoning Details.

M-2-49 Comment noted.

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Page 19

1 about those properties, other than to say that, in
2 general, I think it's important that the City allow for
3 more freedom of the developers to choose the uses
4 within certain guidelines. Because the developers have
5 a vested interest, they're going to be the ones making
6 the investment, and they have to pay for that
7 investment.

8 And so there's some examples I can give
9 of controls gone awry, like there's some retail in
10 Bellevue that got built recently, like in the last
11 10 years, where they don't allow some kind of medical
12 uses but they allow others, which is confusing to the
13 market and to the developers.

14 And I just want to make the point that
15 wherever the City can give flexibility on uses and
16 provide incentives for doing what they want to do --
17 what they want people to do, and maybe disincentives
18 for less density, for things they don't want people to
19 build, that may be the way to handle it, as opposed to
20 strictly saying it's prohibited.

21 And I think that retail is the glue that
22 holds all neighborhoods together. And my example is
23 Old Main. It's heavily, heavily retailed by
24 independent locals, for the most part, and it works
25 really well. It's an exciting place to go. And I'd

M-2-48

M-2-49

M-2

COMMENT

RESPONSE

M-2-50 Eastrail will provide excellent access within Wilburton and connections to the region. As new development occurs within Wilburton, new local Eastrail access points will be built.

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M-2-49

1 like to see that happen along 6th Street, from 405 all
2 the way -- or actually, from City Hall across from 405
3 all the way to 120th.

M-2-50

4 There happens to be some room in between
5 Uwajimaya and Mutual Materials for bike trails --
6 mountain biking trails with a down-route and an
7 up-route. It could be a real amenity, not only for
8 people who are using their bikes to get to and from
9 work, but they're also using their bikes to have free
10 time.

(Concluded at 8:00 p.m.)

--oOo--

M-2

COMMENT

RESPONSE

Public Comment Period - Day 3 - 6/1/2023

Page 21

C E R T I F I C A T E

1
2 STATE OF WASHINGTON)
3) ss.
4 COUNTY OF SNOHOMISH)


5 I, Sierra Zanghi, Certified Court Reporter in and for
6 the State of Washington, reported the within and foregoing
7 hearing on Thursday, June 1, 2023; that pursuant to RCW
8 5.28.010 the witnesses were first by me duly sworn; that
9 said hearing was taken by me in shorthand and thereafter
10 under my supervision transcribed; and that the same is a
11 full, true and correct record of the proceedings including
12 all testimony and questions, answers, and objections, if
13 any, of counsel.


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

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

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

IN WITNESS WHEREOF I have set my hand this 13th day
of June, 2023.


SIERRA ZANGHI, RSR,
WA CCR NO. 22084202



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M-3


COMMENT

RESPONSE

Public Comment Meeting - Day 2


In re: City of Bellevue's Comprehensive Plan Update

May 23, 2023



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COMMENT

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Public Comment Meeting - Day 2 - 5/23/2023

Page 1

CITY OF BELLEVUE

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

PUBLIC MEETING
PUBLIC COMMENT PORTION

Taken at Crossroads Community Center
16000 Northeast 10th Street
Bellevue, Washington 98008

DATE TAKEN: May 23, 2023, at 6:00 p.m.
REPORTED BY: Sierra Zanghi RSR, CCR 22004202

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M-3

COMMENT

RESPONSE

M-3-1 See Common Response 4 Housing Alternatives.

M-3-2 The Preferred Alternative studied in the FEIS included future land use around Lake Bellevue with a RC-M (Residential/Commercial-Medium) character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.

Public Comment Meeting - Day 2 - 5/23/2023

Page 2

1 BELLEVUE, WASHINGTON
 2 TUESDAY, MAY 23, 2023
 3 6:00 p.m.
 4 --oOo--
 5 KRISTINE LINN: So my name is Kristine
 6 Linn, and I work at 9 Lake Bellevue.
 7 And I'm really excited about the
 8 development plans all over the City, but mostly I'm
 9 excited about transit-oriented housing. I live in
 10 Seattle, and when the light rail came through, it just
 11 revamped our neighborhoods near, you know, like, the
 12 three-block area around the light rail with all kinds
 13 of new housing and different, like, condos but also
 14 apartments, low-income housing, and cafes, mixed-use.
 15 And now those are amazing neighbors that are connected
 16 with light rail.
 17 And so I'm really hopeful that that kind
 18 of development can happen around the new light rail in
 19 Bellevue too, because it just -- it's made community, I
 20 feel like, in South Seattle, and it could do the same
 21 thing on that side of Bellevue; so.
 22 But very specifically, to the plans, I
 23 think that only the third option, I think, out of the
 24 three has increased development around Lake Bellevue,
 25 and that's right at the light rail station. So I think

M-3-1

M-3-2

M-3

COMMENT

RESPONSE

Public Comment Meeting - Day 2 - 5/23/2023

Page 3

M-3-2

1 that that plan to develop that area should be in all
2 three options for more housing and kind of focusing on
3 right there at that station. So that's my input.

4 DAVE PLUMBER: My name's Dave Plumber.
5 I live in Bellevue.

M-3-3

6 Okay. What I'd like the City to do is
7 to publish information that explains where they got the
8 numbers for jobs and housing units in the three action
9 alternatives. They came up with those numbers somehow;
10 so I'd like to get some information like studies,
11 reports, something, put into the EIS that shows where
12 those numbers came from. Okay. Thank you.

M-3-4

13 CLIFFORD CAWTHON: So my name is Cliff
14 Cawthon. I'm the advocacy and policy manager for
15 Habitat for Humanity, and we're based in Renton. And,
16 fun fact, I actually teach part-time at Bellevue
17 College; so I'm here quite frequently. And I'm really
18 happy with the outreach that the City of Bellevue is
19 doing, really grateful to be welcomed here.

M-3-5

20 And so we, as an organization, support
21 Alternative 3, that we think it's the best way forward
22 when it comes to not just building affordable housing
23 and setting the stage for a more inclusive city, but we
24 also urge that the City pursue Alternative 3,
25 particularly because these mixed-use centers create a

M-3-3 See Common Response 13 Growth Targets.

M-3-4 Comment noted.

M-3-5 See Common Response 4 Housing Alternatives.

M-3

COMMENT

RESPONSE

M-3-6 Risk of Displacement is discussed in DEIS Chapter 7, *Housing*, on page 7-21 and mapped in figure 7-10.

Public Comment Meeting - Day 2 - 5/23/2023

Page 4

1 great opportunity to create more affordable housing for
2 more people at a time where our entire region just
3 really needs it, and Bellevue is a hub of the Eastside.

4 But also, spreading that throughout the
5 city will also, or spreading density throughout the
6 city, will eliminate the kinds of patterns of
7 residential segregation we've seen historically, as
8 well as, you know, fully utilizing the value of the
9 increased heightened neighborhood centers with a
10 variety of different affordable housing tools,
11 everything from inclusionary zoning as well as using
12 fee-in-lieu tools will allow the construction of more
13 affordable housing. So with affordable housing,
14 obviously I've mentioned several times, it needs to be
15 a priority.

16 And with that, in terms of the EIS, that
17 we would definitely like to see displacement quantified
18 in the DEIS, because we want to be clear that when
19 we're talking about economic displacement, we're
20 talking about people who have been either
21 disenfranchised or who are economically disadvantaged
22 people like many of our homeowners who are now living
23 as homeowners in many of our developments.
24 Particularly, you know, we have development over here
25 at Holy Cross where we are working with community to

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M-3-5

M-3-6

M-3

COMMENT

RESPONSE

M-3-7 Comment noted.

M-3-8 Comment noted.

Public Comment Meeting - Day 2 - 5/23/2023

Page 5

M-3-6

1 develop affordable homes for folks.

M-3-7

2 So to sum it all up, that Bellevue, in
3 this process, can chart the way, utilizing all these
4 tools as well as non-profit owned land for affordable
5 housing as well and, you know, including duplexes and
6 triplexes and cottage housing, all the way up to the
7 four- and six-plexes, albeit affordable, new transit in
8 order to build on the requirements in 1110.

M-3-8

9 Because right now, we have a city where
10 about 89 percent of the people who work here do not
11 live here. In order to become a livable, vibrant,
12 inclusive city and make sure that housing security is
13 more of a reality for more people, that we should -- I
14 encourage the City of Bellevue to move boldly ahead.

15 DAN RENN: I'm Daniel Renn. I live at
16 603 129th Place Northeast, in the middle of Wilburton.

17 First comment is that I wish we would
18 call it the "Wilburton Commercial Area" or "Wilburton
19 West Edge," because when people talk about the
20 "Wilburton vision implementation," everybody in my
21 neighborhood panics that you're going to change our
22 single-family homing area. And all we're talking about
23 is "Wilburton West Edge." I was on the CAC back in '17
24 and '18 when we discussed that, and we tried to be very
25 careful about calling it the "Wilburton Commercial

M-3

COMMENT

RESPONSE

M-3-9 Comment noted.

M-3-10 See FEIS Chapter 11, *Transportation*. This chapter includes suggested actions that can mitigate the impacts of parking and traffic that could accompany the development of housing.

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1 Area."
 2 The second thing I'd have to say is that
 3 back in about 1980 or so, when the City Hall was down
 4 where the Lexus dealer is, I was involved with City
 5 Council talking about the same kind of thing we're
 6 talking about today. And they said, "Oh, well, we have
 7 to have more development. We have to have more
 8 businesses. We have to have more housing to keep our
 9 tax rate lower."

M-3-9

10 And my comment at that time was, "Are
 11 you trying to tell me that the tax rate in Manhattan is
 12 lower than the tax rate in Fall City?" I don't believe
 13 that's true. I think we're pushing more towards
 14 Manhattan and less like Fall City. It will make it a
 15 less desirable place to live and less like Bellevue
 16 should be. We've got so much commercial going on that
 17 we can't manage it all now.

M-3-10

18 And the other thing is that our transit
 19 system is underutilized and probably overbuilt and not
 20 going to be developed. We need to have parking places
 21 for all the cars that the people have in their
 22 apartments, and the idea of building apartments with
 23 200 apartments and 150 parking places is not
 24 satisfactory. We have to have enough parking for all
 25 the apartments, because many of these apartments are

M-3

COMMENT

RESPONSE

M-3-11 See Common Response 4 Housing Alternatives.

Public Comment Meeting - Day 2 - 5/23/2023

Page 7

M-3-10

1 going to have two cars in them, not just one, and
2 certainly not a half.

3 That's really my comments for today.

4 And as I say, I was on the Citizens Advisory Committee,
5 I know what's happening in Wilburton's West Edge. And
6 I understand that we need some development and some
7 increased population, but we don't push it too far.
8 Thank you.

9 ALIA ATWELL: I am Alia Atwell. I live
10 at 541 166th Avenue Northeast.

11 And I just wanted to say how excited I
12 am by the second and third alternatives, because I see
13 the importance of increasing density even in my
14 single-family area.

M-3-11

15 I think it's really important because we
16 just don't see people on the streets anymore. Like,
17 there's not -- there's not children playing, and that
18 means our schools get shut down. And, like, because
19 it's kind of shutting out, like, who can live there,
20 because my house has doubled in price in the last
21 six years since I bought it. There's -- it's outside
22 of the price range that I would look for if I were
23 searching for a home again.

24 And so unless we increase housing, then
25 we continue to have that problem. And unless we

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COMMENT

RESPONSE

M-3-12 See Common Response 4 Housing Alternatives. See Common Response 14 Equity and Environmental Sustainability Metrics.

Public Comment Meeting - Day 2 - 5/23/2023

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1 increase the density of that housing, you can't get the
 2 purchase prices low enough for most people. And when
 3 most people can't live there, the only people who move
 4 there are people also like me, who are double-tech
 5 incomes and don't have kids and don't, like, get as
 6 involved with community and, you know, tend to stay a
 7 little bit more isolated.

M-3-11

8 And then that breaks down the community,
 9 and the community becomes isolated, and then the people
 10 who move there extra don't want to be involved with the
 11 community because it's a cycle that creates a community
 12 that's not advantageous for us, going into the future.

13 I really appreciate everything that
 14 people are doing to increase the number of people who
 15 can live here, the people who can live here from
 16 different backgrounds, and really restart that cycle of
 17 where people can move in, people can care for their
 18 families, which means they can get involved with the
 19 schools here, they can be involved with the local area,
 20 we support more diversity of businesses, you know, all
 21 the great restaurants and cafes we're, you know,
 22 getting from being so multicultural, you know, that
 23 further drives more people to want to live here, and
 24 that's how we make a really positive community in a
 25 place like Bellevue that is never going to not be

M-3-12

M-3

COMMENT

RESPONSE

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M-3-12

1 urban. We just are urban. So, like, we should act
2 like it. And so I appreciate that.

M-3-13

3 MATT GARDNER: My name is Matt Gardner.
4 I live at 161 165th Avenue Northeast in Bellevue.
5 And as far as what we've seen today, I'm
6 most interested in Option 3. I like to see more mixed
7 use. I like that there is housing around the lake in
8 that option.

M-3-14

9 More broadly, I think what they're
10 looking to do in Wilburton is great. You know, I'm in
11 support -- the whole neighborhood looks like it's going
12 to be really cool.

M-3-15

13 I'd really like to see more small
14 commercial stuff spread throughout the city, in
15 addition. I think that's one of the things that we are
16 missing most. I imagine that's probably not something
17 that's been, you know, one of the things they studied
18 in the Environmental Impact Plan, and I know doing that
19 is a lot of work, and I'm not trying to suggest slowing
20 down and redoing all of that.

M-3-16

21 But I think, you know, if people could
22 get to more things that are much closer to their house,
23 that's going to reduce traffic congestion, maybe even
24 get them out of their cars entirely for a lot of trips.
25 And I would love to see that in the City of Bellevue.

M-3-13 Comment noted.

M-3-14 Comment noted.

M-3-15 The EIS studied the concept of Neighborhood Centers – small commercial nodes within predominantly residential areas. These Centers were in Alternatives 2 & 3 as well as the Preferred Alternative.

M-3-16 See FEIS Chapter 11, *Transportation*. This chapter includes actions that could mitigate the traffic and parking impacts of additional housing. The EIS discloses both the transportation-related impacts associated with this additional housing and the potential mitigation measures, and the city may incorporate some of the environmental analysis and mitigation for transportation impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

M-3

COMMENT

RESPONSE

M-3-17 Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis related to HB 1110.

Public Comment Meeting - Day 2 - 5/23/2023

Page 10

1 LORETTA LOPEZ: My name is Loretta

2 Lopez. I'm here to represent the Bridle Trails

3 Community Club. The address of the club is 6619 132nd

4 Avenue Northeast, No. 193, Kirkland, Washington 98033.

5 Our comments concern the issues that are

6 not addressed in the DEIS. And the Bridle Trails

7 Community Club, BTCC, requests that the DEIS be revised

8 to address the issues and reissued with that

9 information.

10 The main issues that have not been

11 addressed are, No. 1, the passage of HB 1110 that was

12 signed into law by Governor Inslee on May 8th, 2023,

13 and that bill overrides local zoning. It fundamentally

14 changes the way zoning has historically been

15 addressed -- significant, major change.

16 The DEIS was prepared in advance of the

17 passage of that bill. That bill has not been analyzed,

18 I think, by most people. And as in the case with new

19 legislation, it requires an attention to detail and the

20 assessment of many issues, including unintended

21 consequence and loopholes. Since this was passed into

22 law on May 8th, it's almost impossible that that has

23 been done by the City. Perhaps the City has done that,

24 and if so, it should be stated in the DEIS.

25 The alternatives that have been

M-3-17

M-3

COMMENT

RESPONSE

M-3-18 See Common Response 11 Impacts of COVID-19.

M-3-19 See Common Response 2 Tree Canopy.

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M-3-17

1 presented in the DEIS need to be revised or they need
2 to address the changes that are going to be required by
3 HB 1110, including the no-action alternative, and that
4 has not been done. And that is a significant
5 deficiency in the DEIS.

M-3-18

6 No. 2, on the issue of COVID. I haven't
7 read every word in the DEIS; however, in my review of
8 it, I don't see that there has been any consideration,
9 or not much consideration, of the changes that COVID
10 has brought to the entire world and that the world has
11 changed. So the numbers and the data that's used to
12 determine how many people would be commuting downtown,
13 how many would be living here and there -- that has not
14 been addressed in the DEIS and is another deficiency.

M-3-19

15 In addition, the City is going to change
16 its tree code, and the tree code has not been addressed
17 in this DEIS. Thank you.

18 (Proceedings concluded at 7:56 p.m.)

19 --oOo--

20
21
22
23
24
25

M-3

COMMENT

RESPONSE

Public Comment Meeting - Day 2 - 5/23/2023

Page 12

CERTIFICATE

STATE OF WASHINGTON)
) ss.
COUNTY OF SNOHOMISH)


I, Sierra Zanghi, Certified Court Reporter in and for the State of Washington, reported the within and foregoing hearing on Tuesday, May 23, 2023; that pursuant to RCW 5.28.010 the witnesses were first by me duly sworn; that said hearing was taken by me in shorthand and thereafter under my supervision transcribed; and that the same is a full, true and correct record of the proceedings including all testimony and questions, answers, and objections, if any, of counsel.


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

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

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

IN WITNESS WHEREOF I have set my hand this 6th day of June, 2023.


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WA CCR NO. 22004202



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O-1

COMMENT

RESPONSE

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

O-1-1 Comment noted. See Common Response 19 Zoning Details.
O-1-2 See Common Response 4 Housing Alternatives.
O-1-3 Comment noted. See Common Response 19 Zoning Details.
O-1-4 See Common Response 4 Housing Alternatives.

O-2

COMMENT

RESPONSE

O-2-1 Artma Pop-Up is excited about the progress of the Bel-Red Art District. We think it is important to remember that creating an art district in Bellevue can not happen organically because of the lack of affordable rent and facilities in the area. Rather a focused effort has to be made to create the right conditions. In order for artists and art businesses to thrive, we need a leadership that is committed to promoting and sustaining an art district through legislation and financial investment.

O-2-1 Comment noted. This is outside the scope of the EIS.

O-3

COMMENT

RESPONSE

O-3-1 See Common Response 2 Tree Canopy.

O-3-1

Good evening.

My name is Don Marsh, and I am speaking tonight on behalf of the non-profit organization 300 Trees, which I founded to distribute thousands of free native trees to Bellevue residents, schools, houses of worship, and small businesses. I recently served on the Bellevue 2044 Strategy Team providing input regarding the Comprehensive Plan Update.

We commend Bellevue for its effort to thoughtfully address our city's housing and traffic challenges through the Comp Plan Update. However, given the importance of Bellevue's urban tree canopy in maintaining the health of residents and the ecosystem, the beauty of our "City in a Park," and mitigation of climate issues such as summer heat islands and winter flood risk, we must ask why the DEIS avoids any quantitative analysis of tree canopy impacts.

It seems obvious that the different growth alternatives described in the DEIS would have varying impacts on the tree canopy. For example, increasing the zoning density in parts of Cougar Mountain or Bridle Trails, as envisioned in at least one of the alternatives, would require removal of hundreds or thousands of trees. That might be a sacrifice we are willing to make to achieve other goals, but without a shred of information about the tradeoffs, the DEIS leaves us blind in an area that most Bellevue residents care deeply about.

The DEIS evaluates the alternatives' impacts related to Land Use Compatibility, Air Quality, Noise, and Aesthetics. The document concludes that these impacts would be similar for each of the alternatives. However, each of these metrics would be impacted by the tree canopy, and therefore, some alternatives might be more attractive than others if a more credible analysis of tree canopy is done.

We ask that tree canopy impacts be considered in the Final EIS or a Supplemental EIS. *For the sake of our city and future generations, we need to have a unifying vision regarding the importance of a healthy tree canopy and a shared understanding of what kind of tradeoffs will be allowed between trees and development. If too many trees are removed, it's not just trees that would be harmed. The quality of our lives and the lives of our kids and grandkids would also be diminished.*

Thank you.

Don Marsh

4411 137th Ave, SE
 Bellevue, WA 98006
 don.m.marsh@gmail.com

O-4

COMMENT

RESPONSE

O-4-1 Comment noted.

O-4-2 See Common Response 4 Housing Alternatives.

O-4-3 See FEIS Chapter 11, *Transportation*, for information on a variety of transportation issues, potential impacts, and potential mitigation measures.



March 23, 2023

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

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

VIA EMAIL to:

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

RE: City of Bellevue Housing Options Comment Letter

Dear Brooke, Janet, and Kate:

O-4-1

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

O-4-2

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

O-4-3

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

O-4

COMMENT

RESPONSE

O-4-3	<p>(connecting the Wilburton Station to the Grand Connection and to communities north and south) all represent a tremendous public investment in transit and in pedestrian/bicycle transportation connections. These connections are all close to or adjacent to the Beta-Bellevue Property in Wilburton. We encourage the City to take full advantage of these public investments by increasing opportunities for housing in this area within easy walking or biking distance from transit.</p>	O-4-4	See Common Response 4 Housing Alternatives. See Common Response 10 Wilburton Street Grid.
	<p>We urge the City to plan for significant residential growth by authorizing significant, high-rise transit-oriented housing with ¼-mile of the Wilburton Station. This approach to accommodate growth provides myriad benefits and addresses or mitigates many of the concerns raised during the housing forums and in other public meetings related to the current comprehensive plan process.</p>	O-4-5	See Common Response 4 Housing Alternatives.
O-4-4	<ul style="list-style-type: none"> • More Housing Units. The region is in a housing crisis, and the City of Bellevue desires to create additional housing of all types that meets the needs of people at all stages of life. Thoughtfully located residential towers can provide housing with efficiency, density, and public amenities that cannot be matched by other housing typologies, such as typical wood over concrete apartments, townhomes, single family housing, or accessory dwelling units. Of course, all housing typologies are necessary and desired. However, the City should seize this unprecedented opportunity to provide meaningful high-rise transit-oriented housing as it prepares to update its Comprehensive Plan and enact the Wilburton rezone. The Wilburton area has the infrastructure and location to be a posterchild for successful transit-oriented, sustainable, and affordable housing. 	O-4-6	See FEIS Chapter 11, <i>Transportation</i> , for more information on transportation options.
O-4-5	<ul style="list-style-type: none"> • Neighborhood Transitions. High-rise transit-oriented housing encourages growth in already urbanized areas. Placing growth in these urbanized areas, in turn, reduces pressure to accommodate growth in areas commonly viewed as single family neighborhoods or transitional areas near these neighborhoods. 	O-4-7	See Common Response 4 Housing Alternatives.
O-4-6	<ul style="list-style-type: none"> • Access to Transit and Jobs / Reducing Congestion. High-rise transit-oriented housing encourages growth near transit. Placing growth near transit provides residents with access to transit and jobs. In turn, these transportation options reduce vehicular trips and congestion, and create an overall more sustainable community. 	O-4-8	Comment noted.
O-4-7	<ul style="list-style-type: none"> • Affordable Housing. When incentive zoning and MFTE are properly aligned with market forces and incentive-based zoning, high-rise residential development provides market-rate and affordable housing units. 		
O-4-8	<ul style="list-style-type: none"> • Other Uses. Recent economic forces have dampened demand for office development. Office redevelopment should remain allowed as a permitted use in these transit-oriented areas, but residential uses should also be a permitted use in these areas for the reasons above. Together, the residential and commercial uses will create a vibrant mixed-use urban fabric. Residents both in the Wilburton area and surrounding neighborhoods will benefit from the opportunities for services and workplaces that are accessible via transit or on foot. 		

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

Sincerely,

Jacquie Quarré
Tharsis Law

O-5

	COMMENT	RESPONSE	
O-5-1	<p>1. Hello - I'm an Affordable Housing Advisory Committee member for CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing (senior and family) at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. While a redevelopment is several years away, the City has a unique opportunity to make significant gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing. This can be achieved by supporting a height variance of 16 stories on these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these two properties.</p>	O-5-1	Comment noted.
O-5-2		O-5-2	See Common Response 4 Housing Alternatives.

O-6

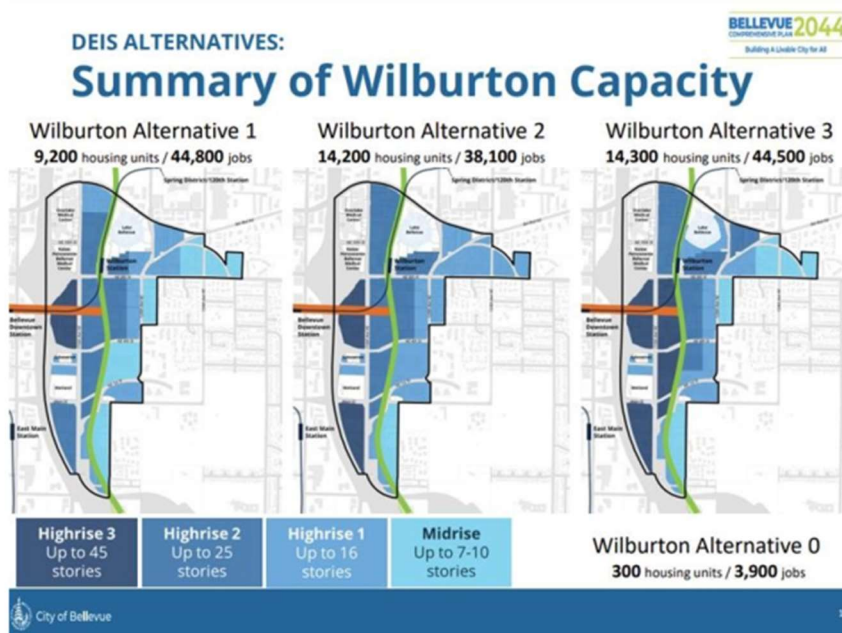
	COMMENT	RESPONSE	
O-6-1	<p>2. Hello - I'm an Affordable Housing Advisory Committee member for CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these two properties.</p>	O-6-1	Comment noted.
O-6-2		O-6-2	Comment noted.
O-6-3		O-6-3	See response to O-5-2. See Common Response 19 Zoning Details.

O-7	COMMENT	RESPONSE
O-7-1	To whom it may concern.	O-7-1 Comment noted.
O-7-2	<p>I'm advocating on behalf of CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these three properties.</p> <p>I feel this could be a once-in-a-generation opportunity for Bellevue and its residents, and I hope you can give these requests serious thought.</p> <p>Gratefully,</p> <p>F J Pane</p>	O-7-2 Comment noted.
O-7-3		O-7-3 See response O-5-2.
O-8	COMMENT	RESPONSE
O-8-1	<p>Hello - I'm advocating on behalf of CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these three properties.</p>	O-8-1 Comment noted.
O-8-2		O-8-2 Comment noted.
O-8-3		O-8-3 See Response O-5-2.

O-8

COMMENT

RESPONSE



O-9

Please see attached letter.

COMMENT

RESPONSE

O-9-1 See Common Response 14 Equity and Environmental Sustainability Metrics.



O-9-2 See Common Response 4 Housing Alternatives. See Common Response 15 Climate Change and State Planning Framework.

O-9-1

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

O-9-3 Comment noted.

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

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

O-9-2

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

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

Further Support & Emphasize Multimodal Transportation Options

O-9-3

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

O-9

COMMENT

RESPONSE



O-9-4

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

O-9-5

O-9-6

O-9-7

O-9-8

O-9-9

O-9-10

O-9-4

See FEIS Chapter 11, *Transportation*. This chapter includes a full spectrum of mitigation measures that the city can consider. The city may incorporate some of the environmental analysis and mitigation for transportation-related impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

O-9-5

Comment noted.

O-9-6

Comment noted.

O-9-7

The FEIS analyzes potential environmental impacts associated with the range of alternatives identified in the EIS and identifies potential mitigation for those impacts; but the EIS does not create a hierarchy of preferred mitigation measures. This is outside the scope of the EIS as a disclosure document.

O-9-8

See FEIS Chapter 11, *Transportation*, for additional information on potential mitigation measures.

O-9-9

The EIS analyses the environmental impacts of a buildout scenario and proposes measures the city can take to mitigate those impacts. The Mobility Implementation Plan provides the vision for a complete and connected transportation system. The Plan does not include an implementation schedule as this ultimately is a policy decision regarding funding. However, the city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

O-9-10

Prioritization of transportation projects is outside the scope of this EIS. Identifying and prioritizing transportation network projects begins with the Transportation Facilities Plan and an initial methodology to address performance target gaps is provided in the Mobility Implementation Plan.

O-9

COMMENT

RESPONSE



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

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

Housing & Land Use Policies Need to Support our Equity Goals

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

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

O-9-11 The DEIS refers to the Mobility Implementation Plan that describes the complete and connected network and performance targets for all modes. A programmatic mitigation approach (rather than prescribing specific projects) relies on the circumstances that evolve over time to identify and prioritize projects for funding through the Transportation Facilities Plan. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations. However, the EIS is a disclosure document that identifies the environmental impacts associated with the potential build out of the range of growth alternatives analyzed in the EIS.

O-9-12 Comment noted.

O-9-13 See Common Response 4 Housing Alternatives.

O-9-14 One of the goals of the Growth Management Act is to "identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance (RCW 36.70A.020.13)." Establishing a historical preservation program is one recommendation in DEIS Appendix D, *Historic Resources Survey*, Section 5. The City may adopt some, all, or none of the recommendations in the appendices of the DEIS.

O-9-15 The EIS is a disclosure document that analyzes the potential environmental impacts associated with the range of growth alternatives studied in the EIS, and the EIS identifies potential mitigation for those impacts. The City may choose to include some, all, or none of the environmental impact analysis, identified mitigation measures, and recommendations in the EIS in the update to the Comprehensive Plan.

O-9-11

O-9-12

O-9-13

O-9-14

O-9-15

O-9

COMMENT

RESPONSE



O-9-15

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

O-9-16

- The final EIS should include a more detailed methodology for how future displacement is estimated. The analysis makes clear that a PSRC-created index is used for today, but for future timescales the methodology seems unclear. How are "lower", "moderate", and "higher" defined in terms of displacement risk? What distinctions are being made between "physical" displacement and "economic" displacement? We ask that the precise impacts of increased housing supply and more affordability tools on reduced displacement risk be made clear in the Final EIS.

O-9-17

- City leadership have repeatedly expressed the importance of both creating affordable retail space and supporting the 15-minute city paradigm by making it easier for residents to access their daily needs nearby without a car. To support both of these priorities, our organization encourages the city to, in its final preferred alternative, evaluate the impacts of land use policies that would allow for small-scale & low-impact businesses – like corner stores, bars, coffee shops, doctor's offices, etc. – to be established in residential neighborhoods. Allowing businesses that meet the daily needs of nearby residents to operate out of people's homes supports the creation of affordable retail space by removing the requirement for entrepreneurs to rent a separate commercial space. Enabling the creation of small-scale commercial spaces in residential neighborhoods also supports increased social cohesion and community bonding through the support of "third places" – areas separate from work and the home that contribute to a sense of belonging. Our organization would also posit that creating more amenities & necessities closer to where people live & play would reduce negative impacts to the overall transportation system by reducing trip lengths, thus making it possible for more people to complete more trips outside of a car. To determine whether this hypothesis is true, we strongly encourage the inclusion of such an evaluation in the final EIS.

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

Sincerely,

Christopher Randels
Director, Complete Streets Bellevue
470-205-4310
crandels@cs-belleveue.org
he/him

O-9-16

The EIS is an evaluation of a buildout scenario which will likely take more than the planning timeframe of 20 years to achieve. As such, the EIS provides a non-project analysis of environmental impacts and identifies potential mitigation for those impacts to inform the city's non-project policy decisions. Given this non-project framework, more general estimates better reflect the range of outcomes under the different growth alternatives analyzed in the EIS. Additional study of displacement has been done outside of the EIS in the Racially Disparate Impact Analysis.

O-9-17

The City conducted a complementary Economic Analysis. The results of this analysis can be found on the Engaging Bellevue website at engagingbellevue.com.

O-10

COMMENT

RESPONSE



Wig Properties LLC

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

June 8, 2023

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

Dear Reilly and Members of the Staff:

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

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

O-10-1

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

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

O-10-2

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

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

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

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

3. Finally, we would recommend examining taller building heights (~450') along the freeway in the high density East Main district if a shorter residential building was constructed at 112th & Main St in the EIS. This would:

O-10-3

- a. Shift height away from the Surrey Downs neighborhood and toward I-405;

O-10-1 Comment noted.

O-10-2 The proposed changes have been made.

O-10-3 The FEIS did not include an analysis of a change in the development standards in the East Main zones. These zones were recently adopted and assumed to continue with the same general standards.

O-10

COMMENT

RESPONSE

O-10-3

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

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

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

Warm regards,

Mon Wig
Wig Properties


Leshya Wig
Wig Properties

O-11

COMMENT

RESPONSE

O-11-1

O-11-2

O-11-3

Hello - thank you for the opportunity to provide feedback on the DEIS for Wilburton neighborhood. Downtown Action to Save Housing, DASH, has been rebranded as CIRC, an affiliate of Transforming Age. We are in conceptual planning for two of our Bellevue projects; Evergreen Court Retirement, 900 124th Avenue NE, and Glendale Apartments, 12640 NE 10th Place. These properties are promising locations to add more badly needed affordable housing for seniors and families in Bellevue. They have provided this critical resource since our ownership over the last 20+ years. Given the age of the buildings, the Wilburton Vision, and the ever increasing demand for more housing, these are ideal for a redevelopment. We advocate for alternative 2 overlay on these locations to allow up to 16 stories. Additionally, Transforming Age made a significant commitment to this redevelopment by entering into a contract to acquire a third contiguous lot located at 12520 NE 10th Place, which greatly enhances the ability to redevelop our existing two properties, and significantly increase the affordable housing we can develop on these three parcels. We advocate for a boundary modification to include this third parcel in the Wilburton study area with the alternative 2 overlay, as it is the most logical way to bring these three sites together. Lastly, in our planning, we recognize an opportunity to optimize this redevelopment with a future Right of Way modification to vacate NE 10th PL.

Thank you!
Alicia

O-11-1

Comment noted.

O-11-2

Comment noted. See Common Response 19 Zoning Details.

O-11-3

The FEIS did not include an analysis of a change in the development standards in the East Main zones. These zones were recently adopted and assumed to continue with the same general standards.

O-12

COMMENT

RESPONSE



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

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

June 12, 2023

VIA ELECTRONIC SUBMITAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS Comment

Dear Reilly:

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

Specifically, my comments on the DEIS are:

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

However, the DEIS indicates that the land use designation will be "mostly" office with "some" housing and other uses for Office-Highrise-1 and "mostly" housing with "some" office and other uses for Residential-Commercial-Highrise-2. We encourage the City to adopt a Preferred Alternative that is not prescriptive as to the size of the permitted uses that can be allowed within the development envelope. The City's updated Comprehensive Plan and zoning will guide the City for over two decades. No one can accurately predict the precise market and financial conditions over that horizon. The City should not be overly prescriptive in dictating uses within the development densities for these areas. Instead, the Preferred Alternative should allow for maximum use flexibility to be responsive to market demand.

- **For the Bel-Red subarea, the City should expand the eligible projects for transportation impact fee credits to include all right of way dedications and new infrastructure necessary to implement the Code-required street grid.**

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

Sincerely,
Radiance Tower, LLC
Northrup Center LLC

By: Stanley Xu
Managing Member

- O-12-1 The details of the future land use designations included in the Preferred Alternative can be found in DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.
- O-12-2 See Common Response 17 BelRed Street Grid.

O-12-1

O-12-2

O-13

COMMENT

RESPONSE

Dear City of Bellevue,

Thank you for seeking input on the Comprehensive Plan DEIS.

There are many aspects that I support:

O-13-1 See Common Response 4 Housing Alternatives.

O-13-2 All of the action alternatives and the Preferred Alternative provide for increased opportunities for housing and jobs near transit.

O-13-3 See Common Response 7 Parks and Open Space.

O-13-4 All alternatives will include some amount of redevelopment. The DEIS acknowledges in Chapter 3, *Land Use Patterns and Urban Form*, on page 3-53 that '[a]s redevelopment occurs, there is potential for localized land use compatibility impacts to occur where newer development is of greater height and intensity than existing development. These compatibility impacts, if they occur, are likely temporary and would resolve over time. The extent of these conflicts varies by alternative and can be reduced by the application of existing or new development and design standards.' The EIS includes analysis of the impact to public views but the impact to private views is outside of the scope of the EIS. See Common Response 19 Zoning Details.

O-13-5 Comment noted.

- O-13-1 • Continued housing growth to alleviate the housing affordability crisis
- O-13-2 • Concentration of growth around public transportation to confer environmental benefits and attenuate traffic congestion
- O-13-3 • Improving key recreational corridors and connections to them like Eastrail

This growth can occur in full and without impediment while also considering a concern I have together with hundreds of fellow neighbors. I live at Bellevue Towers, downtown's largest condominium communities with 1200 residents. Depending on how buildings are situated on the block between 4th & 6th and I-405 & 116th, hundreds of residents from our community stand to lose one of the last remaining views of nature to the East.

It is completely possible to develop properties to the most intensive alternative in the comprehensive plan and also preserve that small remaining view - by having requirements for siting and massing. Again, this would not lower the developable capacity in any way!

A proposal that I and fellow neighbors support is to have slim towers on the northern end of the block, with the tower portion sited as north as possible. Towers on the southern end of the block have a smaller impact but would benefit from a mirror treatment.

While it may seem small to some, retaining a connection to nature from home is proven to have positive health effects (especially since as Americans we spend over 87% of our lives indoors) and given that this impacts hundreds of residents, I think it is a worthwhile request. Again, I fully support the development to its fullest extent, this is a harmless way to achieve multiple goals at the same time.

As an added benefit, this would also enhance eastern views from the proposed I-405 Lid Park as well, so there is a broader public benefit as well.
Thank you for considering my and my fellow neighbors' feedback.

Ed Anderson

President, BoD Bellevue Towers Homeowners Association

O-14	COMMENT	RESPONSE
	Thank you for the opportunity to comment on the Bellevue/Wilburton DEIS. First, we are excited about the future prospects for the area, as well as the entire City.	O-14-1 Comment noted.
O-14-1	Our family built, and continues to own, four buildings in the Wilburton study area. These properties are just south of The Spring District, equidistant between the Wilburton and Spring District light rail stations. This is the western part of the BelRed Corridor.	O-14-2 See DEIS Appendix B, <i>Land Use Patterns and Urban Form Appendix</i> , for details of the land use that was studied in the FEIS as part of the Preferred Alternative.
O-14-2	We look forward to the time when these buildings, built about fifty years ago, can be redeveloped into a much more urban form. We support the City's overall goal of accommodating growth in Bellevue's growth corridors.	O-14-3 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.
O-14-2	Overall, we support Alternative 3, which would grant the highest likelihood redevelopment would be economically viable. Alt. 3 would also create the best opportunity to provide the supply of housing our growing community needs.	O-14-4 See FEIS Chapter 11, <i>Transportation</i> . The city uses a multimodal approach to meeting transportation demand.
O-14-3	We also request the greatest flexibility in the types of Permitted Uses possible. With the rapidly changing dynamics of real estate demand, there is unprecedented uncertainty in the future needs of a growing City.	O-14-5 The extension of NE 6th Street to 116th Avenue NE is common to all alternatives. An arterial extension between 116th Avenue NE and 120th Avenue NE is analyzed as a 5-lane arterial. The Preferred Alternative considers anticipated advantages and disadvantages of a new arterial.
O-14-3	If the City desires housing over non-residential development, we recommend creating incentives to make housing even more economically attractive than alternative uses.	O-14-6 Comment noted.
O-14-4	Regarding transportation, we believe it is imperative for the future success of the City, and the study area in particular, to abide by the letter and intent of Comprehensive Plan Transportation Policy TR-2. Furthermore, the City should allocate capacity based on its forecasted demand (rather than grant preferential treatment to any particular mode). The goal should be to maximize the overall throughput of all people traveling on Bellevue's transportation network.	O-14-7 See Common Response 5 Assumption of Buildout.
O-14-5	Specific to the Wilburton area, we strongly encourage the City to complete the last, best complete street project available... the N.E. 6th Street Extension to 120th Avenue N. E. Please do not make the same mistake made decades ago in Downtown, when Bellevue failed to build out a better grid system.	
O-14-5	Downtown's super blocks have been bad for pedestrians and motor vehicles. Wilburton should have a robust complete street grid system, especially with an arterial that connects Wilburton and BelRed to I-405 at the upcoming N.E. 6th Street. A great example to emulate is Spring Boulevard through The Spring District. It has outstanding facilities for all modes of travel. N.E. 6th Street's extension to 120th Avenue. N.E. Is part of the BelRed Transformation's transportation investment program. This extension was also part of Bellevue's TIFIA loan funded transportation grid. Without it, congestion at many system	

O-14

COMMENT

RESPONSE

O-14-6 | intersections would be even worse. One of the major impacts of failing to finish this long-planned project would be diminished access to Downtown and BelRed. Another negative impact would be the discouragement of workers returning to work because congestion is such a turnoff. Better mobility means greater economic vitality.

O-14-7 | Finally, we ask the City to reconsider the “market factor” it used in its assumptions regarding how much redevelopment would occur in the various study alternatives. The assumption that development would occur at 100% of what the Land Use Code would allow generally overstates what would actually occur. This, in turn, overstates the impacts of each alternative. We encourage the City to use more nuanced and accurate development yields in its SEPA analysis.

Thank you for the consideration of our comments . We look forward to the continued collaboration between the City and property owners in crafting the best Alternative, Comprehensive Plan and Land Use Code possible.

Sincerely,

T.J., Todd and David Woosley
Brierwood Center. LLC

O-15

COMMENT

RESPONSE

O-15-1 Comment noted.

O-15-2 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-MU-M on the BelRed Property identified and OLB on the Eastgate Property identified. For more information on future land use designations, see DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.



June 12, 2023

VIA ELECTRONIC SUBMITTAL

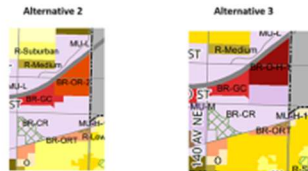
Reilly Pittman
 Planning Manager
 City of Bellevue
 Department of Community Development
 450 110th Avenue NE
 Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS Comment

Dear Reilly:

I am writing on behalf of 520 Bellevue, LLC and 520 Bellevue II, LLC, which owns property at 14404 – 14408 NE 20th Street (Bel-Red Properties), and I-90 Bellevue I Investments, LLC, which owns property at 3245 158th Avenue SE (Eastgate Property). Thank you for the opportunity to comment on the City of Bellevue’s Comprehensive Plan Draft Environmental Impact Statement (DEIS) for the 2044 Comprehensive Plan (2044 Comp Plan). Our comments on the DEIS are:

- **Preferred Alternative should study and apply BR-MU-M densities to encourage viable mixed-use development options for the Bel-Red Properties.**
 - The Alternatives appear to show the Bel-Red Properties as BR-CR zoning. This is a lower-density Bel-Red designation, especially when considering that the Alternatives propose new mixed-use densities up to 15 stories to the east.



BR-CR	BR-CR	BelRed - Commercial/Residential, Midrise
	BR-MU-M	BelRed - Mixed Use - Midrise, Mix of

O-15-1

O-15-2

O-15

COMMENT

RESPONSE

June 12, 2023
Page 2 of 2

O-15-3 | It is unclear, but Alternative 3 appears to show a distinction in purple colors on the Land Use Map that suggests the area north of 20th Street – including the Bel-Red Properties – is being increased Bel-Red Mixed-Use Midrise (BR-MU-M). The story structures on the Bel-Red Properties are candidates for redevelopment within this planning horizon. The City should plan for and encourage mixed-use redevelopment of low-rise buildings on NE 20th Street.

O-15-4 | o The Preferred Alternative should include the Bel-Red Properties at BR-MU-M designation to support infill development opportunities along 20th Street.

O-15-5 | **• Support for Alternative 3 for the Eastgate Property, but encourage the Preferred Alternative to evaluate and propose Mixed-Use Midrise for the site.**

O-15-5 | o We support Alternative 3 for the Eastgate Property, which designates it as Mixed-Use Lowrise (MU-L). We would encourage the City to evaluate and propose a Mixed-Use Midrise designation for the Eastgate Property. Our Eastgate Property is likely to redevelop within the 2044 Plan time horizon.

O-15-5 | While a Mixed-Use Lowrise designation would encourage townhome or stacked flat development options, increasing the densities to Mixed-Use Midrise would provide additional flexibility for creative housing typologies that would support more ground floor retail or on-site open space options. This will help the Eastgate area develop its neighborhood serving amenities.

O-15-6 | **• Preferred Alternative should allow for flexibility in the mix of allowed uses.**

O-15-6 | The City's planning for uses should be less restrictive. The Preferred Alternative should allow for all commercial, residential, retail, and lodging uses within Bel-Red and Eastgate areas, rather than being overly prescriptive.

O-15-7 | **• The City should expand the eligible projects for transportation impact fee credits to include all right of way dedications and pedestrian infrastructure necessary to implement Code-required grids in Bel-Red and Eastgate areas.**

O-15-3 | This commenter is correct, the parcels referenced in this comment were not labeled in the Map for Alternative 3, but the color indicates that they were studied with a future land use designation of BR-MU-M.

O-15-4 | Comment noted.

O-15-5 | See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

O-15-6 | See Common Response 4 Housing Alternatives.

O-15-7 | See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This is a non Project EIS and specific changes to code are beyond the scope of the EIS.

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

Sincerely,



Jonathan Tran
Principal – Rainier Pacific Properties

520 Bellevue, LLC – Authorized Representative
520 Bellevue II, LLC – Authorized Representative
I-90 Bellevue I Investments, LLC – Authorized Representative

1618 S Lane Street Suite 203 Seattle, WA. 98144

O-16

COMMENT

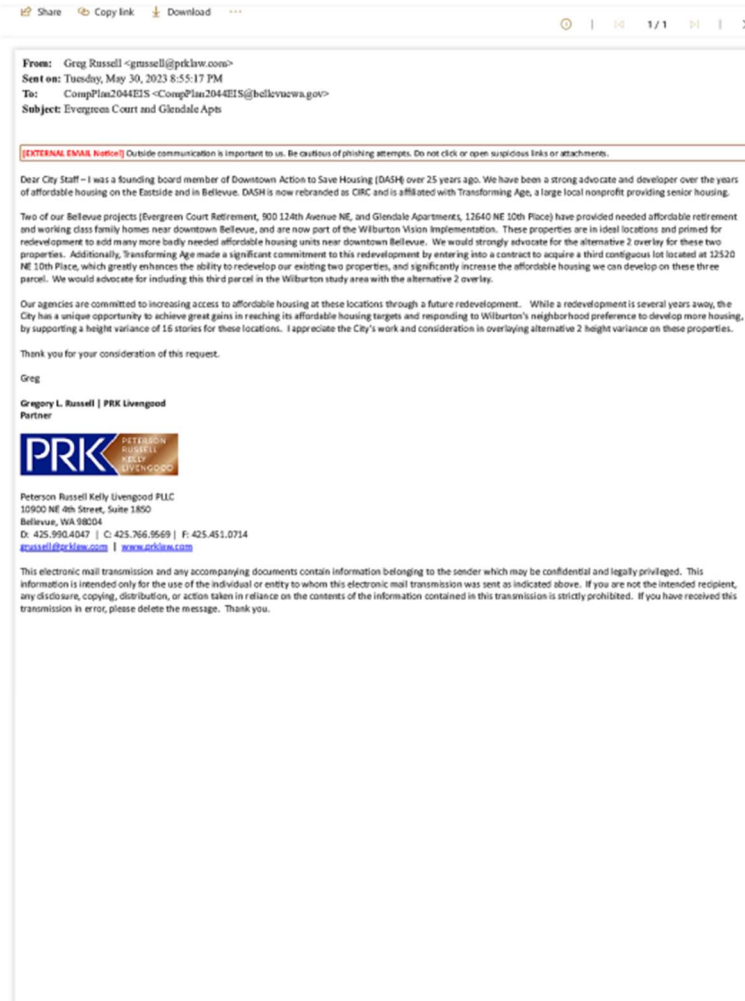
RESPONSE

O-16-1 Comment noted.

O-16-2 Changes to study area boundaries are not part of the EIS scope, which analyzes environmental impacts associated with the Comprehensive Plan Periodic Update and the Wilburton Vision Implementation planning initiative, but these type of changes may be considered as part of different city Comprehensive Plan amendment processes in the future.

O-16-3 These sites were studied with an RC-M designation in the Preferred Alternative. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.

O-16-1
O-16-2
O-16-3



O-17

COMMENT

RESPONSE

O-17-1 See Common Response 4 Housing Alternatives.

O-17-2 See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.

O-17-3 See Common Response 2 Tree Canopy.

O-17-4 See Common Response 4 Housing Alternatives.

RE: Bellevue Comprehensive Plan Draft EIS

The Earth and Climate Action Ministry of East Shore Unitarian Church supports Option 3* of the Bellevue 2044 Comprehensive Plan as it is more sensitive to our environment and will offer more housing, especially more affordable housing.

Option 3 allows more development throughout the city, thus increasing housing potential. With more dispersed housing and commercial areas, walking and bicycling become more reasonable options and the idea of fifteen-minute city more chance of becoming a reality. Fewer car trips would mean less emissions and better air quality. Improving intercity and intracity transit are paramount for reducing car trips and ensuring the success of Option 3.

However, whatever option is chosen, there must be monitoring and concern about meeting our GHG goals. The Comprehensive Plan must include policies that require sustainable growth practices. For example, new or redeveloped buildings should be all electric, meet high efficiency performance standards (LEED Platinum or better), include EV charging stations, and have waste management systems that include composting and recycling.

Great attention needs to be given to green canopy and green spaces and insure the 40% is met throughout the city. Maintaining tree canopy throughout the city will reduce heat island effect for all and slow stormwater runoff. Developers should be required to keep the best trees on the property.

Please adopt Alternative 3 as the best way to manage our growth and our environment while at the same time providing more affordable housing than the other alternatives.

Kristi Weir
Earth and Climate Action Ministry
East Shore Unitarian Church



*Partial Description of Alternative 3 from the Comprehensive Plan Draft EIS.
"Alternative 3: Providing options throughout the city. Alternative 3 would allow a greater diversity of housing types in all centers and along transit corridors, combining the areas of focus in Alternatives 1 and 2. There would be capacity for an additional 95,000 housing units (which is 54,000 more units of housing capacity than the No Action Alternative). Mandatory or inclusionary affordable housing would be required in Mixed Use Centers, with incentives for affordable housing in other locations."

O-18

COMMENT

RESPONSE

O-18-1 Comment noted.

O-18-2 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

Sternoff LLC
SandyAllen2017@Outlook.com
 206-743-4006

June 8, 2023

Via Email: CompPlan2044EIS@bellevuewa.gov

Elizabeth Stead
 City of Bellevue
 Land Use Director and SEPA Responsible Official

Re: **City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS**
Comments from Sternoff LLC

Dear Ms. Stead:

Thank you for the opportunity to submit comments on the City's DEIS for the 2024-2044 Comprehensive Plan Periodic Update.

The Sternoff family has owned property and operated businesses in the City of Bellevue for several decades. We are invested in the community and in the future growth of the City. One of our family companies, Sternoff LLC ("Sternoff"), owns real property located within the study area at 1750 124th Ave NE 98005 ("Sternoff Property"). We submit these comments on its behalf.

A. Property and Neighborhood Characteristics

The Sternoff Property is approximately 116,203 square feet. It is improved with industrial warehouse space that was constructed in or around 1982 and the entirety of the site is covered by impervious surface. The Sternoff Property is zoned BelRed—Office/Residential and is within the Bel-Red Subarea. It is within short walking distance of the Spring District Light Rail Station (less than 1,000 feet) and is adjacent to the developing Spring District.

Given the tremendous growth the region and the City have witnessed and the forecasts for future growth it is imperative that the land use policies the City selects for the Bel-Red area, *especially those properties that are within walking distance of high-capacity transit*, maximize density. The Sternoff Property and many of the surrounding properties are presently developed with light industrial warehouse uses. As the City notes in the Bel-Red Subarea Plan, and as we have witnessed, Bel-Red's light industrial past has seen significant declines.¹ Existing land use regulations are aimed at accommodating this trend and seek to transition the area away from light industrial to an urban environment. Recent investment in the addition of high-capacity light rail and the success of the Spring District will expedite that transition. It is likely that the remaining properties in the Bel-Red Subarea with light industrial uses will re-develop under the plans and policies the City is considering in this DEIS. Once redeveloped, the opportunity to re-

¹ Bel-Red Subarea Plan at 11.

O-18-1

O-18-2

O-18

COMMENT

RESPONSE

O-18-2

shape development of the area will not arise again until the useful economic life of the buildings has expired.

B. The DEIS Should Consider Alternatives With Even Greater Density Within Walking Distance of High-Capacity Transit

The City should not miss the opportunity to capitalize on the investment made in light rail and should be considering policies that would allow even greater density for parcels within walking distance of high-capacity transit than what is presently considered in the DEIS. As noted above, many if not all the remaining light industrial properties proximate to high-capacity transit will be redeveloped under the policies and regulations the City implements as part of this process. High-capacity transit is a significant, once-in-a-lifetime investment in the transportation network for the City and region. The new land use policies should reflect that.

O-18-3

We applaud the City for recognizing the need to capitalize on this investment as evidenced by its focus on the BelRed Look Forward to increase density around light rail. We believe the City should consider even greater density for properties proximate to these stations than what is presently under review. Allowing even greater density in these areas will serve a number of local and regional planning goals including, but not limited to, reducing housing costs via supply and demand, providing more opportunity for affordable housing, and focusing growth around transit. Perhaps most importantly, allowing higher density options around transit centers will help the City minimize the impact of accommodating future growth beyond this planning cycle. If properties proximate to transit are underdeveloped the City will need to upzone surrounding neighborhoods where high-capacity transit does not exist to accommodate future growth projections. This could have significant impacts that are not reviewed or assessed in the DEIS. In short, the City should be considering policies for properties proximate to high-capacity transit, like the Sternoff Property, that will accommodate growth over the next 60 years, not 20.

C. In the Event that City does not Propose Higher-Density Options, the City Should Select Alternative 3 as the Preferred Alternative Because It Most Closely Aligns with Regional and Local Planning Goals and Policies

As noted above, the City should consider higher-density options for areas within walking distance of high-capacity transit. In the event the City elects not to consider higher-density options, the City should identify Alternative 3 as the preferred alternative because it most closely aligns with the needs of the region and the City. As noted above, the addition of high-capacity light rail fundamentally changes the demands on land in the Bel-Red sub-area. The City's land use policies and regulations must be updated to address those demands.

O-18-4

A significant component of Vision 2050 is the regional development of high-capacity transit to manage impacts associated with growth. Vision 2050 focused on the "unprecedented" investment the public has made for a regional transportation network. Vision 2050 focuses on transportation centered land use policies recognizing that commercial and housing density proximate to high-capacity transit further quality-of-life goals, climate goals and social-equity promises. To that end, Vision 2050 establishes a goal that 65% of the region's population growth and 75% of the region's employment growth be located in regional growth centers and within walking distance of access to high-capacity transit. As of 2019, less than one-third of housing units within the City of Bellevue were in transit proximate areas. (DEIS 7-30).

O-18-3 Each action alternative in the DEIS provides for significant opportunities for new development near light rail stations (except South Bellevue where wetlands and steep slopes constrain development potential).

O-18-4 See Common Response 4 Housing Alternatives. See Common Response 14 Equity and Environmental Sustainability Metrics. See Common Response 15 Climate Change and State Planning Framework.

O-18

COMMENT

RESPONSE

O-18-5 See Common Response 4 Housing Alternatives, which address HB 1110.

O-18-6 The Preferred Alternative studied in the FEIS included a future land use designation of BR-RC-H-1 for the property identified, the same future land use designation as in Alternative 3.

O-18-7 See Common Response 4, Housing Alternatives.

O-18-8 See Response to O-18-7.

O-18-5

Allowing more density near light rail stations will help guide future growth into efficient and climate-friendly sites while reducing the pressure on existing neighborhoods, particularly in light of the recent passage of HB 1110, the so-called missing middle housing bill. Alternative 3 is the only alternative that proposes high density employment and residential designations for parcels within walking distance of transit stations to achieve those goals.

D. If the City Elects An Alternative Other Than Alternative 3 as the Preferred Alternative, it Should Maintain the Alternative 3 Land Use Designations for Properties Within Walking Distance to the Light Rail Station Like the Sternoff Property

If the City does select an alternative other than Alternative 3 as its preferred alternative, the City should maintain the Alternative 3 designations for properties within walking distance to high-capacity transit stations. The alternative impacts assessed in the DEIS assess impacts of an alternative as a collective whole across the City and does not assess impacts on a localized basis. Thus, while Alternative 3 may generate higher impacts in some areas City-wide, those impacts are not as great in specific areas like Bel-Red. For example, while Alternative 3 has a higher risk of housing displacement across the City, the risk for displacement in the BelRed area is "low to moderate". (DEIS at 7-27). Likewise, Alternative 3 is identified as having an adverse impact to Land Use Compatibility. (DEIS at 3-83). The discussion, however, suggests that this impact is most attributable to land use changes proposed in areas of the City outside of the Mixed-Use Centers. Thus, if the impacts cause the City to select an alternative other than Alternative 3 as the preferred alternative, it should maintain the Alternative 3 designations for properties within walking distance of high-capacity transit.

O-18-6

E. Affordable Housing Regulations Should be Incentive Based and the DEIS Does Not Assess How Mandatory Affordable Housing Might Impact Redevelopment Goals

The alternatives discussion state that mandatory affordable housing will be required in the "Mixed-Use Centers" while incentive-based affordable housing would be available in "other locations." The DEIS does not explain why affordable housing will be mandatory in Mixed Use Centers but incentive-based elsewhere. To the extent the City is aiming to develop more affordable housing in the Mixed-Use Centers it should assess voluntary inclusionary housing incentives as well as mandatory incentives in Mixed Use Centers.

O-18-7

Mandatory affordable housing policies, if not properly balanced can undermine the redevelopment goals the City seeks to achieve with this update.² Portland witnessed unintended impacts including a drop in multi-family housing projects following implementation of mandatory affordable housing policies.³ Seattle's ongoing experiment with mandatory affordable housing has produced less

O-18-8

² The lawfulness of mandatory affordable housing regulations is also an open question. A case challenging Seattle's application of its MHA ordinance is pending in US District Court for the Western District of Washington. *Adams v. City of Seattle*, Western Washington District Court Cause No. 2:22-cv-01767.

³ <https://cityobservatory.org/inclusionary-zoning-portlands-wile-e-coyote-moment-has-arrived/>

O-18

COMMENT

RESPONSE

O-18-9 Comment noted.

O-18-10 See Common Response 19 Zoning Details.

O-18-11 Each action alternative anticipated 'transit oriented development' near light rail stations (except South Bellevue where wetlands and steep slopes constrain development potential).

O-18-8

affordable units than those created under incentive based affordable housing policies like the multifamily tax exemption (MFTE) program.⁴

If the aim is to generate actual affordable units in Mixed Use Centers incentive-based programs are more likely to achieve that end over mandatory programs. Under both Portland and Seattle's mandatory affordable housing programs developers have overwhelmingly elected to pay a fee instead of constructing affordable units. The DEIS should prioritize incentive-based affordable housing policies in Alternative 3 or, at a minimum, consider land use regulations and policies that would permit developers to utilize an incentive-based affordable housing program to satisfy affordable housing requirements.

O-18-9

Finally, in balancing its affordable housing incentive program, the City should also take into account the total costs of development including impact fees, utilities and transportation infrastructure, updated building and energy codes, and the costs of development standards and other desired community benefits to ensure the program will result in development and achieve its residential density goals.

F. The DEIS Should Consider Limited Policy Amendments to Exclude Existing Impervious Surfaces from Buffer Setbacks for Redevelopment of Properties Within Walking Distance of High-Capacity Transit

O-18-10

Maximizing density within walking distance of high-capacity transit is a primary goal of regional and local planning policies. As part of its update the City should consider limited amendments to its critical areas code to ensure that existing developed parcels within walking distance of high-capacity transit may be fully redeveloped within the existing developed footprint. As currently written, the Bellevue Code excludes the footprint of a "structure" from the critical area buffer. That exclusion does not, however, extend to ancillary development like sheds, garages or impervious surfaces that support the structure. And expansion of the structure into the buffer may only be allowed subject to a Critical Areas Report.

Application of the code could disincentivize redevelopment of developed lots within walking distance of the light rail station or result in an underutilization of the existing built environment. The City should consider limited amendments to its critical areas code to exclude a structure and any lawfully constructed supporting improvements (including impervious surfaces) from the buffers for streams and wetlands for parcels within walking distance of transit. This amendment will allow for full utilization of the existing built environment in areas within walking distance of high-capacity transit.

O-18-11

G. The City Should Consider Transit-Oriented Policies in Addition to Density

The City should consider other transit-oriented policies in addition to increasing density for properties proximate to the transit stations. For example, the City should assess reducing or eliminating mandatory parking requirements for properties within walking distance to high-capacity transit stations. Not only would such policies encourage transit use (and reduce the load on the road network) it would help minimize housing costs by reducing or eliminating the need for subgrade, structured parking.⁵

⁴ See Roger Valdez, Series: Challenging Mandatory Inclusionary Zoning, Forbes available at: <https://www.forbes.com/sites/rogervaldez/2023/01/11/series-challenging-mandatory-inclusionary-zoning/?sh=1609507b4b5c>

⁵ . One study found that a single unit of structured parking adds an average of \$50,000 in costs per-unit. <https://www.brookings.edu/research/parking-requirements-and-foundations-are-driving-up-the-cost-of-multifamily-housing/>

O-18

COMMENT

RESPONSE

O-18-12

Likewise, the DEIS should assess and consider adjusting development regulations that limit density like prescriptive floorplate sizes, tower step-backs and setbacks and lot coverage limits. Application of these regulations could work to undermine the City's density goals under each alternative.

We look forward to working with the City to do our part to increase residential density near light rail stations. Thank you for considering these comments.



Sandy Sternoff-Allen

Cc: JT Cooke (via email)
Campbell Mathewson (via email)

O-18-12 See Common Response 19 Zoning Details. In addition, the capacity for each alternative is not the goal. The growth targets remain the same under any alternative.

O-19

COMMENT

RESPONSE

O-19-1 The Preferred Alternative studied in the FEIS included a future land use designation of MU-H-3 on the properties identified, which is similar to Alternative 3 in the DEIS.

DITTY PROPERTIES
Part of Bellevue since 1928

June 8, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: Bellevue 2044 Comprehensive Plan DEIS Comments

Dear Liz and Reilly,

We appreciate the opportunity to build on our scoping comment letter (a copy of which is attached) with additional follow-up comments that we have prepared on the City of Bellevue's (the "City") Draft Environmental Impact Statement ("DEIS") for its 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. Our family owns property at 11635 - 11647 NE 8th Street, which is located in the heart of the Wilburton Study Area, approximately 200 feet south of the future Wilburton light rail station across the new NE 8th Street Eastrail bridge, and abutting Eastrail (the "Midlakes Site" or "Site"). This Site is also convenient to Overlake Medical Center, Kaiser Permanente and the I-405 on- and off-ramps. The City has identified the Site for MU-H-3 zoning in Alternative 3 and this designation should be carried forward to the Preferred Alternative.

We hope to redevelop the site for high-rise residential use, which would be consistent with the MU-H-3 designation and help activate and complement Eastrail. For us, the Site represents the continuation of a nearly century-long legacy of family engagement in Bellevue's development. The site is at the intersection of the Eastrail bike and pedestrian route, the Grand Connection, and the new Wilburton light rail station; and provides an unparalleled opportunity in the City for high-density residential development. It could house workers from the immediate area—for instance medical workers from Overlake and Kaiser—or from across the region who will have convenient access to transit.

To better understand the Midlakes Site's capacity to provide new housing, we commissioned an architectural feasibility study. In case it is helpful for your reference, an excerpt of that study, showing a proposed site plan for housing, is provided below. This study has informed our enclosed comments on the DEIS.

O-19-1

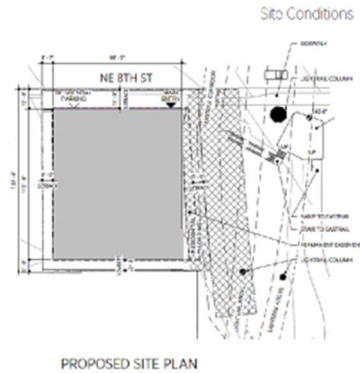
O-19

COMMENT

RESPONSE

O-19-2 See Common Response 4 Housing Alternatives.

Page | 2



1. The FEIS Should Adopt Alternative 3 as the Preferred Alternative to Support Clean Air, Transit-Oriented Development, and Housing Supply through the Highest Possible Densities in Wilburton.

As the City knows, Wilburton is unique in the region. It is located at a true confluence of transportation modes, surrounded by Link Light Rail, Eastrail, the Grand Connection, I-405, and the Eastside's only existing bus rapid transit line on NE 8th Street. Wilburton presents one of the best opportunities in the state for transit-oriented development. Its location provides the City an opportunity to embrace and enhance the good work done by the CAC, especially now that Light Rail and Eastrail are nearly open and the City, County and State are all focused on how to create new transit-oriented density for housing at all income levels. Wilburton's central and connected location makes it the obvious site for new multifamily homes that can efficiently and sustainably integrated with the City and region's multi-billion dollar investments in transit, bike, and pedestrian infrastructure.

For the City to truly realize the transit-oriented, residential density it is targeting, it should adopt Alternative 3 as its Preferred Alternative for Wilburton in the Final EIS. This Alternative appropriately designates the central portion of Wilburton MU-H-3, which will allow a mix of high-rise uses, including high-rise residential towers up to 450'. If the City chooses not to adopt Alternative 3 in its entirety as its Preferred Alternative, then it should retain the MU-H-3 designation for the central portion of Wilburton located between NE 8th Street to the north, NE 4th Street to the south and Eastrail to the east, including the Midlakes Site. This area is the heart of Wilburton and it is appropriate to locate the highest density and intensity of uses here where the surrounding streets and transportation facilities provide natural buffers to surrounding lower density areas.

O-19

COMMENT

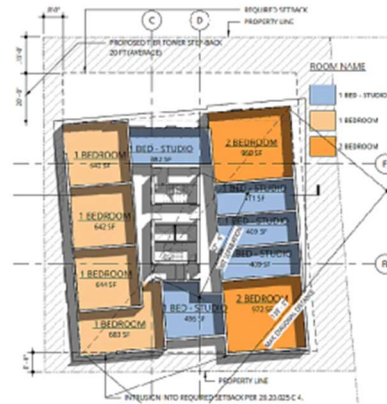
RESPONSE

O-19-3 See Common Response 4 Housing Alternatives.

Page | 3

O-19-3

Wilburton also represents the City's greatest opportunity for housing supply to meet growth targets. The City will need to grow three times faster in the next 20 years compared to the last 20 in order to meet the identified housing targets. The City will only be successful in doing so if it provides sufficiently zoned land for robust residential development. Locating some of the highest density zoning in Wilburton is a necessary step to achieve this growth.



O-19-4 Comment noted.

O-19-5 This is outside the scope of analysis for this EIS and is instead a comment regarding specific development regulations, standards, and amendments to the text of the city's Land Use Code.

O-19-4

Based on our concept study shown above for every 10 feet of height, 11 or 12 additional units could be created, and the gap between the potential yield in Alternative 1 and 2 with a MU-H-2 designation for the property that allows 25 stories versus MU-H-3 at 45 stories is as many as 300 units. Given the City's ambitious housing targets and its limited supply of infill transit-oriented land, the FEIS Preferred Alternative should incorporate and not foreclose the highest densities for central Wilburton and it should include MU-H-3 zoning on the Midlakes Site.

2. The FEIS Should Disclose Development Standard Assumptions and Study Modifications of Current Standards

O-19-5

Beyond building heights, we are concerned with the lack of potential development standards disclosed in the DEIS. Development standard assumptions should be disclosed in the FEIS. For residential development in particular, the City should move to a form-based code that allows specific building forms rather than a traditional zoning code that regulates height, bulk, and FAR. The FEIS should also evaluate the negative environmental and housing impacts of additional constraints that are implicated by prescriptive floorplate sizes, tower step-backs and setbacks, multifamily play areas, lot coverage limits, and similar development standards. Such standards all constrain transit-oriented development and add cost to new residential density at both market and affordable rates.

O-19

COMMENT

RESPONSE

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O-19-6

Instead, the City should specifically incorporate the study of removing an FAR limit in the FEIS. Residential building form should be governed by height, flexible floorplate limits that correspond to efficient building forms (upper limits no less than 12,500 square feet for 450' residential towers and not less than 13,500 for 240' residential towers), and modest setbacks that are consistent with IBC fire code separation requirements. These standards should be studied as alternatives to the City's typical current standards in the FEIS. The City should also study removal of its multifamily play area requirement and instead implement a residential amenity standard and include a children's park and play area incentive as part of the incentive zoning structure.

O-19-6 This is outside the scope of analysis for this EIS.

O-19-7

3. Provide Off-Ramps and Alternative Standards for Small Sites.
The City should also acknowledge in the FEIS that development standards alternatives should be considered for small sites less than 40,000 square feet to ensure development can occur. Alternative development standards should apply to these sites, and they should be exempt from requirements like upper-level setbacks because towers will not be able to shift elsewhere onsite. In addition, the City should allow administrative departures from all development standards aside from height through Design Review to ensure that standards can be applied efficiently on a site-specific basis.

O-19-7 This is outside the scope of analysis for this EIS.

O-19-8 See Common Response 4 Housing Alternatives.

O-19-9 Comment noted. See Response to Comment O-19-8.

O-19-8

4. Deploy Bold Incentives for Affordable Housing, Instead of Inflexible Mandates that Stifle Growth.
Next, incentivizing construction of workforce and affordable housing through an incentive system in Wilburton will encourage the housing mix we need at the locations where people can commute by bus, train, and foot rather than by car. Specifically, the FEIS Preferred Alternative should incorporate an affordable housing program that: (A) is incentive-based above a base height (increase or remove current limits to allow more affordable housing using provisions), (B) includes an in-lieu fee option, and (C) accounts for the total cost of development including the City's requirements for other community amenities in development, impact fees, changing building codes, and utilities and transportation infrastructure. Such a program will best ensure that the code is workable in response to evolving market conditions.

O-19-10 See Common Response 4 Housing Alternatives.

O-19-9

The City's density and affordability goals depend on builders delivering a robust supply of housing at a rate higher than the City has seen before. For such a supply to incorporate market-rate and affordable housing in the face of market uncertainty it must be calibrated to incentivize development overall at a baseline and offer incentives for affordable housing that are meaningfully accretive to projects. The City must consider and plan for the economy's effects on housing goals and it should not adopt programs that compound negative economic news and force building plans onto the shelf.

O-19-10

Recent studies have shown that in the areas where Seattle has chosen an affordability mandate, a chill on new residential units has resulted.¹ Unfortunately, the DEIS not only fails to discuss this

¹ Krimmel, Jacob and Betty Wang. *Upzoning with Strings Attached: Evidence from Seattle's Affordable Housing Mandate*, Furman Center for Real Estate & Urban Policy (New York Univ.) (May 5, 2023). https://furmancenter.org/files/publications/Upzoning_with_Strings_Attached_508.pdf ("new construction fell in the upzoned, affordability-mandated census blocks. Our quasi-experimental border design finds strong evidence of

O-19

COMMENT

RESPONSE

Page | 5

O-19-10

effect; it appears to take for granted that the City will pursue just the kind of program that has been shown to stifle new housing. *See, e.g.,* DEIS at 1-26 (“Citywide Impacts”); Chapter 2, *passim*; Chapter 3 (in discussion of residential displacement); 7-38 through 7-39; 7-41. *Bellevue’s FEIS must study the likelihood that continuation and expansion of a top-down affordability mandate would result in significant negative environmental impacts by chilling the development of housing in the most sustainable and transit-oriented locations. The biggest risk with such a program is that it is ill calibrated and has a chill on development at a time when the City needs the exact opposite; incentive programs are proven to respond better to changing market conditions as they do not carry risk that development will not occur. Instead of mandates, the Preferred Alternative should focus on incentive-based affordable housing programs.*

The FEIS should acknowledge what the data shows: inclusionary mandates result in unintended consequences such as losses in density and transit-oriented development, which will directly counteract the City’s goals for new housing, less pollution, and relieved congestion.

5. Properties on Eastrail Should be Encouraged to Integrate with this Community Amenity.

O-19-11

The City should encourage trail-adjacent development to activate and integrate with the trail. For properties with private agreements with the County, this should include building cantilevers over the trail level at a height of at least 20’ that can provide some weather protection to the trail. For other developments, the incentive system should encourage small, trail-adjacent retail spaces as activating uses that provide opportunities for local businesses.

6. Parking Mandates Enable and Incentivize Congestion and Pollution, and Should Be Discouraged – Especially Near Transit.

O-19-12

To reduce the traffic and air-quality impacts of the new units needed in Bellevue, the FEIS should review and acknowledge that multi-modal neighborhoods like Wilburton provide a great opportunity to build new homes while still minimizing air pollution and traffic impact. *Specifically, the FEIS should study whether decreasing or eliminating mandatory parking will improve the affordability of city living and keep the air cleaner for all of us, and if so, adopt a preferred alternative that embraces the modern approach with no minimum parking requirements.*

O-19-13

By encouraging and enabling true transit-oriented development and density in Wilburton and similar neighborhoods like Bel-Red, the City can take its best available opportunities to reduce and offset traffic and air quality impacts, by directly helping more residents and commuters embrace Light Rail, BRT, the Eastrail, and the Grand Connection. Doing so would reduce the greenhouse gas (“GHG”) emissions and other pollutants in the air we breathe, reduce the congestion on our street networks, and reduce reliance by workers and families on expensive commutes by motor vehicle. The DEIS identifies significant air quality impacts of growth from GHG emissions, but it does not measure the benefit of eliminating parking minimums and creating true transit-oriented neighborhoods as mitigation measures. The FEIS should include this study. Zero parking requirements are essential for affordable housing, where the cost of

developers strategically siting projects away from MHA-zoned plots—despite their upzoning—and instead to nearby blocks and parcels not subject to the program’s affordability requirements.”)

- O-19-11 An Eastrail Framework Plan is in development, with King County as lead agency and Bellevue a participant with particular interest in how the trail is integrated with new development in Wilburton. Land Use Code Amendments will follow the Comprehensive Plan Periodic Update and will detail the specific requirements for new development related to Eastrail access within the framework studied in this EIS.
- O-19-12 See FEIS Chapter 11, *Transportation*. The city uses a multimodal approach to accommodating transportation demand.
- O-19-13 Parking requirements are a zoning detail. See Common Response 19 Zoning Details.

O-19

COMMENT

RESPONSE

Page | 6

O-19-13

building parking is high, and use by residents is low, especially where light rail is located so nearby.

Thank you for taking the time to review and consider our comments, and for all the work you have done and continue doing to plan the greatest possible future for the City of Bellevue. Again, we endorse and encourage the City to adopt Alternative 3 as the Preferred Alternative, or short of that, continue to designate our site and the surrounding area MU-H-3. I appreciate your consideration of our comments.

Sincerely,



R. Kirk Mathewson

Cc: Emil King, Planning Director
Janet Shull, Senior Planner
Thara Johnson, Planning Manager
Abigail DeWeese and Josh Friedmann, HCMP
Campbell Mathewson, CMRE Partners

ND: 23171.002 4864-1421-0660v3

O-20

COMMENT

RESPONSE

O-20-1

The Preferred Alternative studied in the FEIS includes a future land use designation of MU-L on the property identified. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.



June 12, 2023

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

Re: Bellevue 2044 Comprehensive Plan DEIS Comment
Bellevue Technology Center – Support for Alternative 3 with Mixed-Use Midrise

Dear Reilly:

On behalf of Bellevue Technology Center, we appreciate the opportunity to comment on the City's Comprehensive Plan Draft Environmental Impact Statement (DEIS). As you know, the Bellevue Technology Center is the heart of the City's BTC Area neighborhood center in Northeast Bellevue. Bellevue Technology Center is also identified as a Transit Proximate Area.

The DEIS notes that diverse land uses in the Transit Proximate Areas can "reduce vehicle miles traveled, encourage physical activity for residents and employees, and improve equitable access to amenities and community gathering spaces." DEIS, pg. 3-37. We strongly agree.

We encourage the City to adopt a Mixed-Use Midrise designation as the Preferred Alternative to support infill transit-oriented development at the Bellevue Technology Center.

The City must ensure that development under the Mixed-Use Midrise designation is achievable, including supporting the variety of residential uses contemplated with these zones. The DEIS does not disclose or evaluate Northeast Bellevue subarea policies that are inconsistent with a mixed-use designation, such as Policy S-NE-7 that prohibits multifamily uses at Bellevue Technology Center, along with nearby parcels in Northeast Bellevue Districts 1 and 2. The Land Use Code currently allows for senior housing and other residential uses in these Northeast Bellevue districts. The Preferred Alternative must also allow the full variety of residential uses.

As always, thank you for your consideration. Please contact me with any questions.

Sincerely,
s/ Jason Espiritu

O-20-1

O-21

COMMENT

RESPONSE

Please find the enclosed comments of the 116th Avenue Coalition, including Wallace Properties, Wig Properties and Blu Compass LLC.

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June 12, 2023

Reilly Pittman
 Planning Manager
 City of Bellevue
 Department of Community Development
 450 110th Avenue NE
 Bellevue, WA 98004
 Via Email: compplan2044ejs@bellevuewa.gov

Re: 116th Avenue Coalition Comment Letter to Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (DEIS), Issued April 27, 2023

Dear Reilly:

Thank you for the opportunity to comment on the Draft EIS for the Bellevue 2044 Comprehensive Plan Update. The 116th Avenue Coalition is submitting comments on behalf of property owners representing the privately owned land adjacent to the north side of NE 12th Street between I-405 and Spring Boulevard, located at the addresses in the table below, and outlined in red in the map (collectively, the "Property"). On October 31, 2022 we provided a letter explaining that the existing zoning for the Property precludes any viable redevelopment, requesting an extension of the future BR-MO-1 zoning north to include the Property and the other parcels outlined in black in the drawing, and explaining that enabling this increase in allowed development density is justified given the proximity of the Property to the soon-to-be-opened light rail stations at Spring District and Wilburton (see current zoning map above).



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

O-21-1 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-MO-H-2 on the property identified. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

O-21-2 Comment noted.

O-21-1

O-21-2

O-21

COMMENT

RESPONSE

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O-21-3 Modifications to the Wilburton study area boundary are not part of the scope of this EIS.

O-21-4 Comment noted. See Common Response 19 Zoning Details.

In this letter, we:

- Continue to request that the Property receive the same future Comprehensive Plan designation and zoning as our neighbors to the south.
- Support the City's designation of the Property as BR-MO-H-2 (which is the same designation as our neighbors to the south) in all three Alternatives in the Citywide study.
- Request that the FEIS include the Property in the Wilburton Study Area as well.
- Provide the results of our studies as to the suitability of the heights called for in Alternatives 2 & 3 to development of the Property and cohesiveness with the surrounding area. The studies are provided for reference in **Attachment A**.
- Provide additional comments to the DEIS and recommendations for improvements to the land use code to support of viable redevelopment of the Property and a competitive medical and life sciences district.

O-21-3

The drawing below shows the parcel map that corresponds to the yellow-highlighted area on Alternatives 1-3 Citywide zoning maps in Appendix B. All three alternatives designated the Property as BR-MO-H-2, which is described on Appendix B's Land Use Map Key as "Medical office & life sciences with ground floor active uses in highrise towers up to around 24 stories."¹ We also support the inclusion of the parcels north of the Property in the same zone, and refer to the Property and these additional parcels as the "Expansion Area".



As it pertains to the rest of the corridor, Alternative 1 would produce an odd stepdown of the land to the south (BR-MO-H-1) by permitting only 16 story buildings south of NE 12th Street but 24 story buildings to the north. Alternative 1 would also leave the land to the north of the Expansion Area (BR-MO) inappropriately underzoned as well.² In terms of building heights and transition, we support either Alternative 2 or 3, as they provide the same zoning to the south and a reasonable

O-21-4

¹ Appendix B is incorporated into the DEIS document in **Section 1.6, Additional Analysis**, where it states that Appendix B relates to Chapter 3 and provides additional information on zoning designations and overlay districts. **Section 3.1, Introduction**, refers to Appendix B.

²The current BR-MO zone has a maximum FAR of 1.0, which effectively precludes development of all but raw land. The City should consider updating the zoning at the north end of the corridor to something that is viable for redevelopment, and entirely eliminating BR-MO from the code, or attributing much more significant FAR to BR-MO.

O-21

COMMENT

RESPONSE

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O-21-5 Comment noted.

O-21-6 Comment noted.

O-21-7 See Response O-21-3.

O-21-5

transition point to the north where the scale of building heights, and presumably density, reduces for the land outside of the light rail stations' 15-minute walkshed.

O-21-6

We appreciate the City's continued support for medical and new focus on life sciences, which is appropriate for the area given the presence of Overlake Hospital, Childrens Hospital and Kaiser Permanente, and the proposed life sciences project at the intersection of Spring Boulevard and 120th Ave. NE. Extension of the Hospital District in this manner, and proposing zones that facilitate efficient medical office and hospital development (discussed below), will support the existing hospitals and enable growth of medical and life sciences jobs on the Eastside. Doing so supports the City's economic development goals and diversifies its jobs base, all consistent with the City Council's Economic Development Vision, and consistent with other planning goals.

O-21-7

In the FEIS, we ask that the City amend the Wilburton Study Area to include the Expansion Area. From a planning standpoint, the 116th corridor has a stronger relationship with the properties included in the Wilburton subarea to the south of NE 12th Street than the Bel-Red Area to the east. The BR-MO-1 properties to the south of NE 12th Street are included in the Bel-Red Study Area, but they have also been added to the Wilburton Study Area. The Expansion Area should be included as well. As we indicated in our previous letter, treating the Property the same as the currently-zoned BR-MO-1 properties to the south is appropriate because the siting and completion of the light rail stations and Spring Boulevard brings the Property within the walkshed of the stations. This is true of the Expansion Area

parcels if the 15-minute walkshed is used. The current 1.0 maximum density for the Property precludes redevelopment of the land. We would like to have the ability to start planning for development under zoning that matches the property to the south as soon as possible, and would prefer not to have to wait for the Bel-Red update to be completed.



Last year we asked the City if we should submit for a site-specific rezone or participate in the current Comp Plan Update, and were asked to do the latter. If the Property is not going to be included in the Wilburton Study Area we would like to see provisions that make it easier for us to complete a site-specific rezone to the same land use designation as the property to the south; as such, we ask that the FEIS study the Property as the same land use designation as the property to the south.

O-21

COMMENT

RESPONSE

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O-21-8 Project-specific details are outside of the scope of this EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA Review. Development standards for specific Land Use Districts and regulation of private property is considered under the city's Land Use Code.

Please consider the following code provisions for the Property zone (BR-MO-H-2 or otherwise):

- Allow multifamily residential as a permitted use (not currently allowed in BR-MO-1). Vertically integrated mixed use buildings with medical services on the ground floor and residential above are viable. Wallace Properties is currently building an apartment project in Green Lake with a Swedish Medical Clinic on the ground floor. Horizontally integrated projects, such as the Alexandria/Burnstead project on Spring Boulevard, with life sciences and apartment buildings on the same site, are also viable. Permitting this flexibility can help realize both the job and housing goals stated in the Comp Plan Update. Residential or hospitality in close proximity to hospital uses serves patients and hospital workers alike.
- Allow restaurants, retail, professional services, R&D, and computer programming as permitted uses. Current BR-MO-1 zoning does not permit restaurants, many types of retail or professional services, other, computer programming or R&D services. The increased density in the new zone creates the opportunity for integration of retail uses with medical. Projects should not be prohibited from leasing space to non-medical professional services tenants. The new focus on life sciences means that computer programming and R&D should be permitted. Hospitals and life science uses thrive in areas where supportive services to hospital patients and workers are permitted outright; doctors, patients, lab workers and nurses need places to eat and drink, and places to buy things.
- Dimensional requirements. The zone should include the following:
 - For non-residential buildings, allow 30,000 GSF/F Floor Plates to 150' and 24,000 GSF/F above, with floorplate averaging. BR-MO-1 currently allows 28,000 GSF/F up to its height limit of 150'. The 30,000 GSF/F floorplates will improve the viability and competitiveness of life sciences buildings. 24,000 GSF/F is consistent with the floorplate limits for highrise buildings in Downtown zones, such as O-1 and OLB, and is important for highrise office viability.
 - For residential buildings, a 9,000 GSF/F limit is too small. Consider the 13,500 limit in downtown, and a 20,000 GSF/F limit for buildings 150' and below.
 - The impervious surface limits for the Washington Park and Blu Compass parcels are problematic because the grade of the existing street is so much higher than the existing land. Ideally we would build a level parking structure across the site and provide outdoor plaza at the street level. Impervious surface and lot coverage should be increased to 100% in all urban areas; stormwater codes and landscaping requirements can account for stormwater and aesthetic mitigation.
 - Please measure height in feet, not stories (we understand this is how the zoning will be drafted). The height of this zone should be at least 250' to allow for a 17-story R&D or hospital building.
 - Our studies show the maximum FAR will need to be approximately 8.0 to support buildings of this scale on the Property.
 - The existing parking minimums in 20.25D.120 are too high to be viable for highrise, high density development. Please analyze the required parking needs and set the minimums appropriately. Within these light rail walksheds, consider reducing parking minimums to zero and allowing the market to dictate parking supply.

O-21-8

O-21

COMMENT

RESPONSE

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O-21-9 See Response to O-21-3.

O-21-10 Comment noted.

O-21-11 Modifications to the Wilburton study area boundary are not part of the scope for this non-project EIS. The Preferred Alternative studied in the FEIS includes future land use designations of BR-MO-H-2, BR-MOR-H-2 and MI on the properties identified. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

O-21-12 See Common Response 16 Critical Areas.

O-21-9

O-21-10

O-21-11

O-21-12

Section Comments.	
Section	Comment
1.3	Include the Expansion Area in the Wilburton Study Area.
1.7	The analysis of the elements listed in this summary for Wilburton would not change if the Expansion Area were included. Since the Expansion Area is already being analyzed as BR-MO-H-2, the Land Use Patterns and Urban Form, Aesthetics, Housing, Air Quality, Noise, Public Services and Utilities and Transportation all have the same outcomes whether the Expansion Area remains only in the Citywide analysis or is included in the Wilburton Study Area.
2.1	<i>As it pertains to the Mixed-Use Centers</i> , we support Alternative 2 or 3 to be adopted as the Preferred Alternative in the FEIS. Either of these alternatives produce an aggressive amount of new growth by historical standards. Whether to pursue an outcome close to 2 or 3 depends on the ability to mitigate recognized impacts, particularly transportation impacts.
2.2	Include the Expansion Area in the Wilburton Study Area.
2.3	Modifying the Expansion Area to BR-MO-H-2, or a zone consistent with the property to the south, is consistent with the Bellevue City Council Principles for the Wilburton Study Area – particularly the goal of integrated station area planning, since the Expansion Area is within the station area/walkshed of the Wilburton and Spring District light rail stations, and economic vitality, given the opportunity to create jobs. The location of the Expansion Area does not pose adverse impacts on any nearby residential neighborhoods.
2.3.3	The Changes to Alternatives as a Result of Scoping Comments provides, “Expansion of the [BR-MO-1] node in all three alternatives reflecting similar changes to the BelRed Medical Office (BR-MO-1) density south of NE 12 th Street.” This expansion of the node has led to the Expansion Area being designated BR-MO-H-2, which is appreciated. This decision also justifies inclusion of the Expansion Area in the Wilburton Study Area.
2.3.4-2.3.7	We support the proposal in Alternatives 1, 2 and 3 to zone the Property as BR-MO-H-2, or a matching zone to the south, provided that residential, retail, R&D, and restaurants are permitted uses. Either of Alternatives 2 or 3 are acceptable for the Expansion Area. Alternative 0 does not meet the goals stated in the DEIS and Alternative 1 is not favored because it would produce an odd reduction in height (15 stories) for the properties south of NE 12 th , while leaving the Expansion Area height limit at 24 stories.
3.2	Placing the Expansion Area within the Wilburton Study Area may result in some need to revise the statistics in this section, but the overall impact to Wilburton would be nominal.
3.2.2	As shown in the map below, the Expansion Area is subject to a number of critical areas, particularly steep slope critical areas, that may hinder redevelopment if current City code requirements continue to apply. The City must study the Plan’s impacts to steep slope areas, and the Critical Areas Ordinance’s impact on the delivery of density, or risk an inadequate EIS. The DEIS does not include adequate analysis of the Plan’s potential impacts to critical areas, including streams and steep slopes. The lack of analysis renders the EIS potentially inadequate. As part of this analysis, the City should analyze the impacts of the Critical Areas Ordinance on the deliverance of density such that decisionmakers can understand the impacts the steep slope

O-21

COMMENT

RESPONSE

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O-21-12		regulations and stream buffers may have on density. The DEIS portrays areas as "developable" when the opposite is true due to the application of the steep slopes portion of the Critical Areas Ordinance. Manmade steep slopes currently impact our properties; these manmade steep slopes are currently regulated just as a true steep slope hazard area on a natural cliff would be. The City must study the impact of the ordinance on density and disclose impacts such that decisionmakers are aware of the potential that proposed density may not be feasible under current regulations. Please incorporate such analysis into the Preferred Alternative in the FEIS.
O-21-13	3.3	Including the Expansion Area in the Wilburton Study Area and rezoning to BR-MO-H-2, or the same zone to the south would further the ability to meet the growth targets. The large land areas in the Expansion Area would enable appropriate transitions between zones, and this issue could be further ameliorated by including the entire 116 th corridor in the Wilburton Study Area. Displacement and access to community assets is not affected by including the Expansion Area in the Wilburton Study area.
	Ch. 4	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
	Ch. 5	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
O-21-14	5.4.3	Mitigation measures related to business displacement should be carefully studied in the FEIS and such impacts disclosed to decisionmakers. Requiring displaced businesses be given a "right to return" or requiring Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City's idea of an "MFTE" program for small business location is a creative idea that could actually result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS.
O-21-15	Ch. 6	The Expansion Area is surrounded by commercial properties north and south, I-405 to the west and the rail corridor and PSE substation to the east. This means there would few, if any, aesthetic impacts to the surrounding area from its redevelopment in a manner consistent with the proposed BR-MO-H-2 zoning, from making the modifications to the BR-MO-1 code that we request on pages 3-4 above, nor from inclusion of the Expansion Area within the Wilburton Study Area. Redevelopment of these sites would not interfere with any viewsheds, cast undue shadows on homes, and the buildings would be designed to reduce/eliminate light and glare impacts. Including the Expansion Area within the Wilburton Study Area would enable the City to impose the same standards on the Expansion Area as the remainder of the BR-MO-H-2 zoned land.
	Ch. 6	The DEIS states that additional transition measures or other measures to reduce Aesthetic Impacts could be considered as mitigation. We strongly suggest that such mitigation measures be limited for the BR-MO-H-2 zone. As stated above, the property that the DEIS proposes to receive this zoning designation is surrounded by I-405, the rail corridor and other commercial

- O-21-13 Modifications to the Wilburton study area boundary are not part of the scope for this non-project EIS.
- O-21-14 The EIS is a disclosure document that will inform the city's future policy decisions with respect to the Comprehensive Plan Periodic Update and the Wilburton Vision Implementation planning initiative. Although the EIS identifies potential mitigation measures for the environmental impacts associated with the range of growth alternatives studied in the EIS, the City may adopt some, all, or none of the mitigation measures, and/or incorporate some of the environmental analysis in the EIS, into its policies, codes, standards, or regulations.
- O-21-15 Analysis of the impact on views is based on public views, not private views. However, analysis of mitigation measures like setbacks is outside of the scope of this EIS. See Common Response 19 Zoning Details.

O-21

COMMENT

RESPONSE

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O-21-16 See Common Response 4 Housing Affordability.

O-21-17 See Common Response 8 Air Quality/GHG.

O-21-18 See Common Response 6 Noise regarding the regulatory framework for noise levels.

O-21-15		properties. Accordingly, the transition measures should not be applied. Allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings and technology buildings should be allowed larger floor plates. Street or upper level setbacks should not be required in a dense urban environment surrounded by two freeways. Shadows on private property should not be regulated. Views from freeways, and private views, should not be regulated. Any protected public views should be very clearly and narrowly defined. Please include this analysis in the FEIS.
O-21-16	Ch. 7	Alternatives 2 and 3 both contain concerning language about the need for “deeper affordability” to receive a majority of new units that are affordable to <80% AMI. We request that the City closely study the economic and legal issues surrounding housing affordability requirements. Any proposed affordable housing program must be legal, meaning it cannot require a disproportionate share of affordable housing/payment for affordable housing beyond a project’s impacts to affordable housing. Any program must be consistent with HB 1220, which requires “honest planning” to achieve required housing targets. Assuming it is structured reasonably, we support the notion of a “voluntary inclusionary affordability program” in Mixed Use Centers and Neighborhood Centers as stated in Alternative 2 and oppose a “mandatory inclusionary affordability program” in Mixed Use Centers as stated in Alternative 3. Bellevue’s current program for incentivizing 80% AMI affordable housing production, and creating more units through the use of MFTE, should continue. Achieving affordable housing targets below that level, particularly in the 0-30% and 30-50% AMI ranges is not viable through an inclusionary housing program aimed solely at developers. Instead, the City must study and consider the full range of the tools currently available to the City to provide housing at these AMI levels, and ensure that any program does not negatively impact the production of jobs or housing in Bellevue. Such tools to produce a large number of 0-50% AMI units could include a housing levy, a fee-in-lieu program, and housing vouchers. Please disclose these tools to decisionmakers and include this analysis in the FEIS.
O-21-17	Ch. 8	The long-term benefits of redeveloping existing buildings with new projects that are mandated by State code to provide high quality HVAC systems should be considered. In other words, enabling new development is a long-term benefit to air quality. Including the Expansion Area within the Wilburton Study Area has no impact on air quality. “Air quality buffers” from pollution-generating streets impact density production and their impacts must be properly analyzed and disclosed to decisionmakers. The mitigation measure is not well-defined; based on Wilburton’s location, most of Wilburton could qualify for being located in a high air pollution area given its location proximate to I-405 and other major arterials. The City also suggests requiring very expensive air handlers for residential projects near freeways that would significantly increase the cost of housing in Bellevue. The City should carefully study what would happen to its density projections if such a mitigation measure is adopted, and instead the City should consider recommending less severe mitigating measures such as some of those stated in the DEIS: constructing air pollution buffers along freeways and arterials, and reducing Vehicles Miles Traveled (“VMT”) through transportation mitigation measures. Reducing the source of pollution as much as possible should be the first mitigation measure. Please study the impact of inclusion of this mitigation measure in the FEIS.
O-21-18	Ch. 9	The Property, and much of the Wilburton Study Area, lies in proximity to I-405. Bellevue’s current standards for noise control in BCC 9.18.045B.A requires incorporation of sound

O-21

COMMENT

RESPONSE

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O-21-19 See Response O-21-11.

O-21-20 See Response O-21-11.

O-21-18

O-21-19

O-21-20

	<p>attenuation measures intended to reduce interior noise levels to 40 dBA in sleeping areas near areas with 65 decibel exterior ambient noise levels, as opposed to the 45 dBA stated in the DEIS. The 40 dBA level is out of step with similar cities, has resulted in excessively expensive housing costs and will lead developers to seek nonresidential development options for sites near the freeway. We encourage the City to research and implement a more appropriate decibel level.</p> <p>Including the Expansion Area within the Wilburton Study Area has no impact on noise issues.</p> <p>Noise mitigation from existing sources of noise such as roads should not be considered in a dense urban City. Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. These onerous requirements could impact the ability of a Hospital District to form. Please study the impact a potential noise buffer area and other excessive noise mitigation requirements would have on the ability for transit-oriented density to be achieved in the Hospital District. The impact of such mitigation measures should be disclosed in the EIS.</p>
Ch. 10	Including the Expansion Area within the Wilburton Study Area has no impact on public services and utilities.
Ch. 11	The Property is located adjacent to two primary arterials, within the watershed of two light rail stations, and is well served by bus transit, bicycle and pedestrian facilities. Changing the zoning to BR-MO-H-2, or zoning to match the properties to the south, will not result in undue transportation impacts. Including the Expansion Area within the Wilburton Study Area has no impact on transportation.

In summary, we appreciate your work in the DEIS, would appreciate the property being considered for inclusion in the Wilburton Study Area, and if inclusion is not possible we would appreciate studying a zone that allows a site-specific rezone to a similarly dense zone to occur more quickly than the Bel-Red look forward. Thank you for the opportunity to comment. We look forward to working with you in the future.

Sincerely,

DocuSigned by:

882F440962F0481F
Eric Hansen
Manager,
Blu Compass LLC

DocuSigned by:

8B7F7038A8E0487D
Kevin Wallace
Manager,
Wallace Properties –
Washington Park LLC

DocuSigned by:

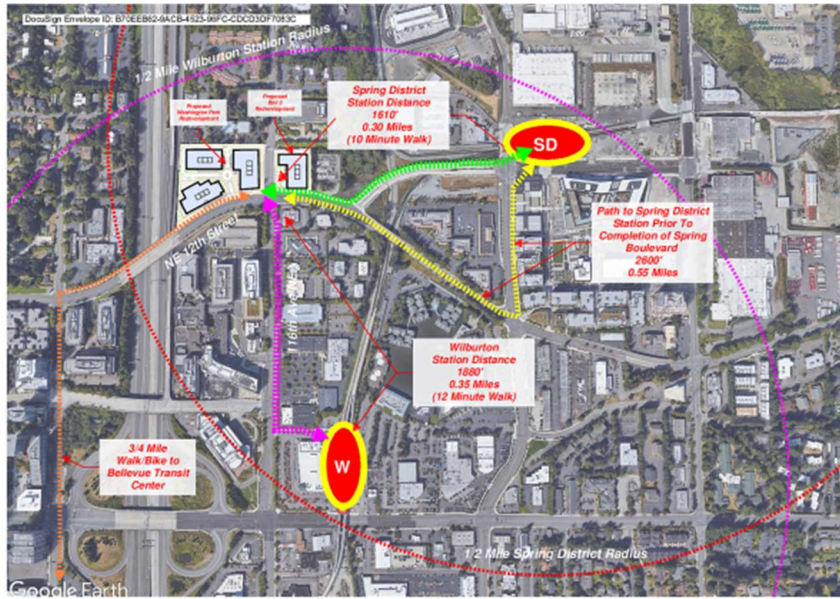
7A26C02271878E
Leshya Wig
Partner/Managing Director,
Wig Properties LLC

Attachment A: Light Rail Station Proximity; Mobility Map; Light Rail Station Watershed Maps; Development Propensity Map and Views.

O-21

COMMENT

RESPONSE

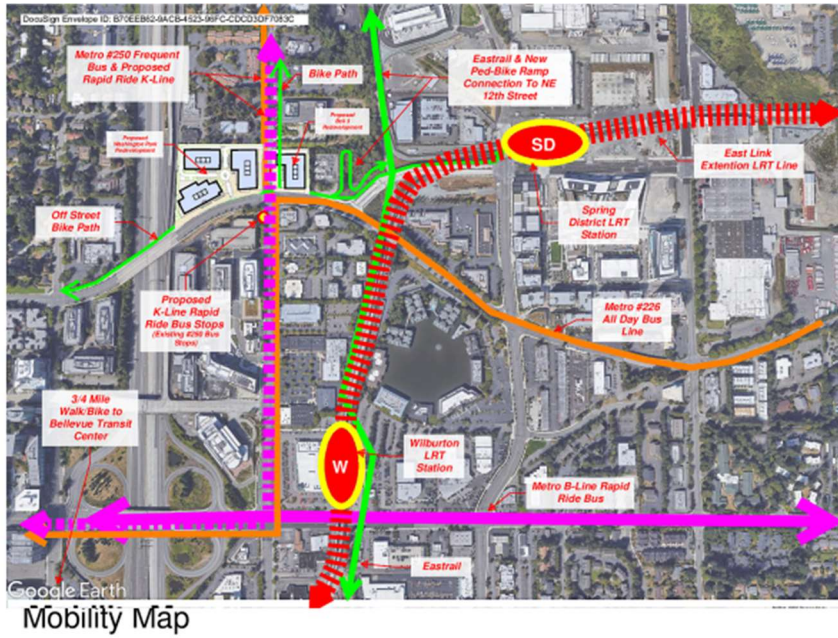


Light Rail Station Proximity

O-21

COMMENT

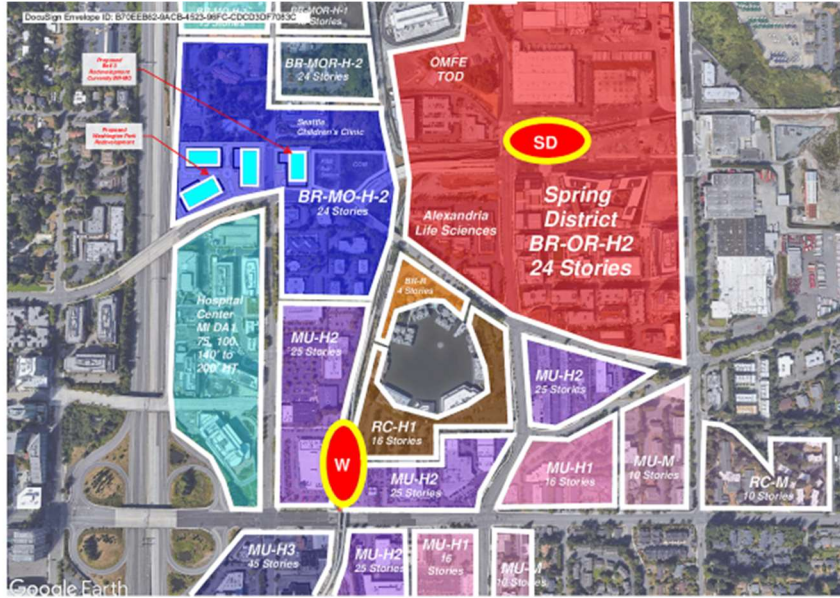
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O-21

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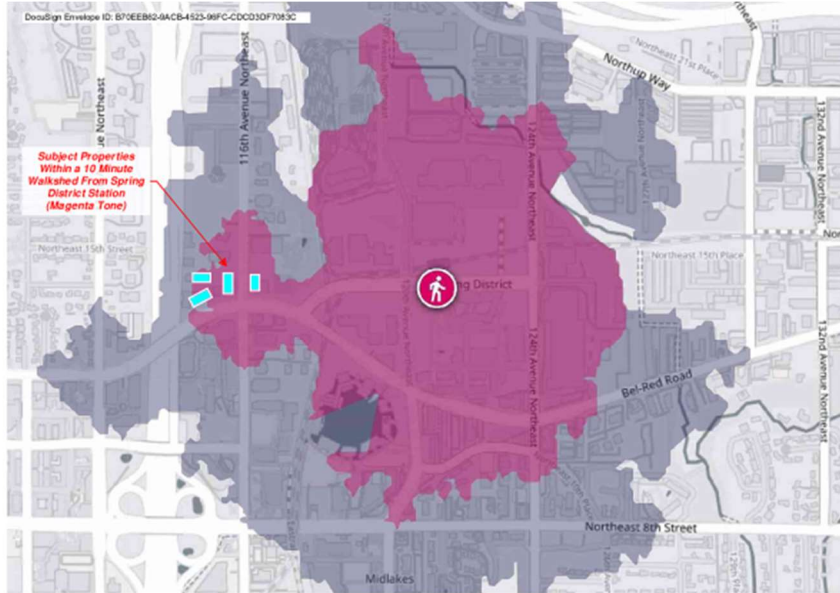
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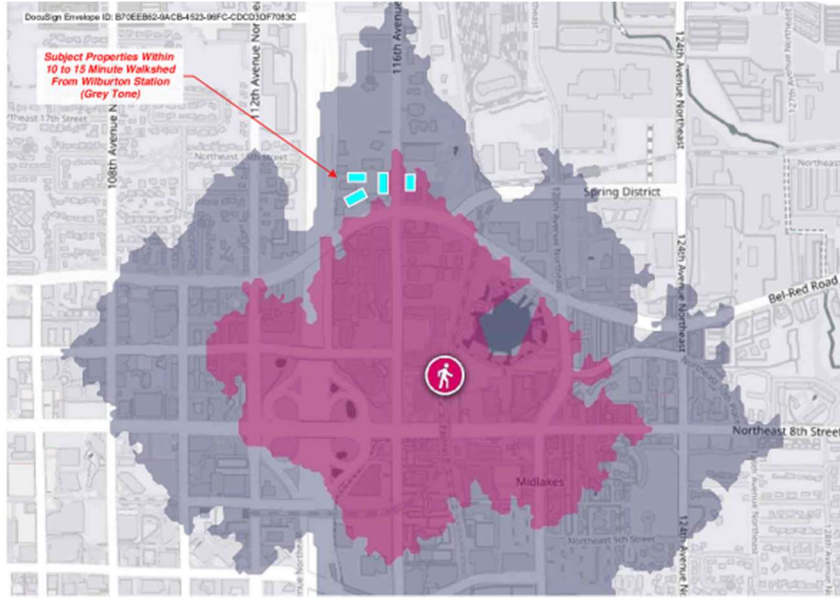


Walkshed 10 Minutes From Spring District Station

O-21

COMMENT

RESPONSE

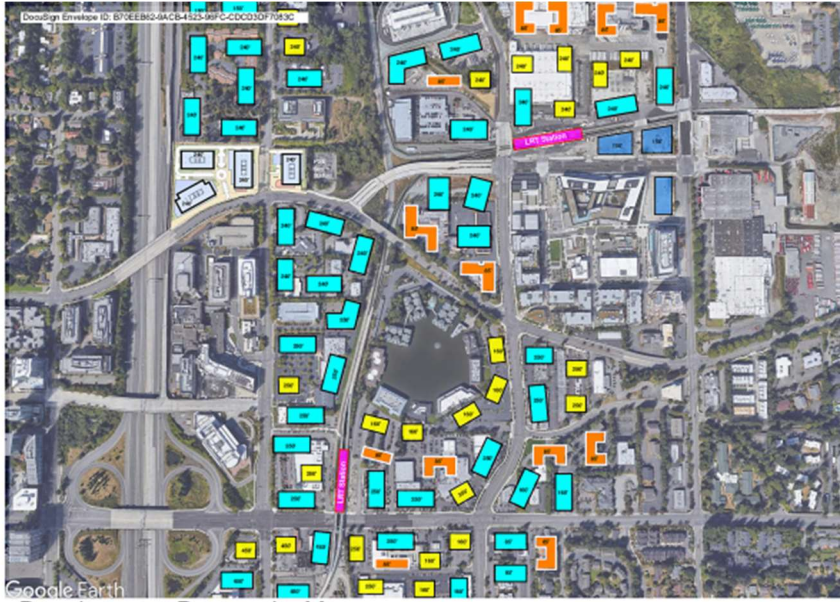


Walkshed 15 Minutes From Wilburton Station

O-21

COMMENT

RESPONSE



Development Propensity Map

O-21

COMMENT

RESPONSE



Future Development Propensity Views

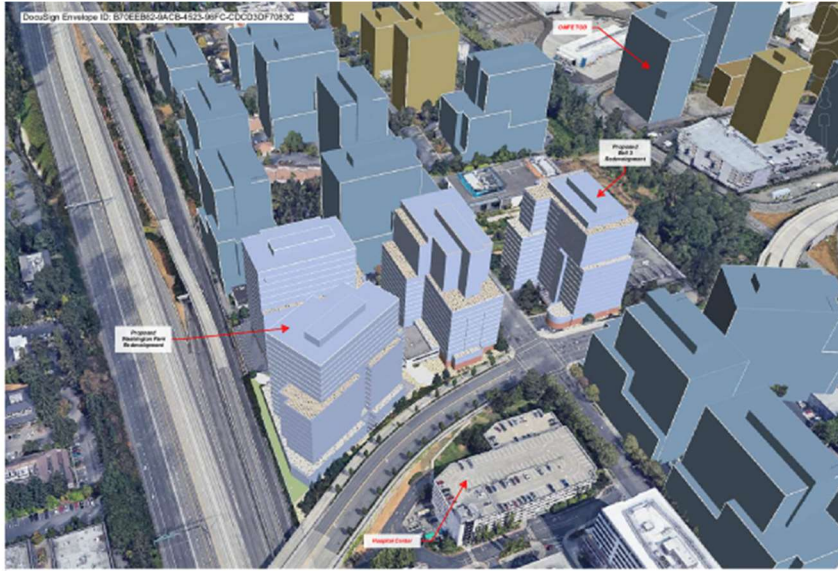
This development estimate was generated using the UrbanSim model, which is a land-use and transportation model that simulates the spatial and temporal patterns of urban growth. The model is based on a set of assumptions and parameters that are derived from historical data and expert judgment. The results of the model are subject to uncertainty and should be used as a guide rather than a definitive prediction. For more information, please contact the UrbanSim team at www.urban-sim.com.

M

O-21

COMMENT

RESPONSE



Future Development Propensity Views

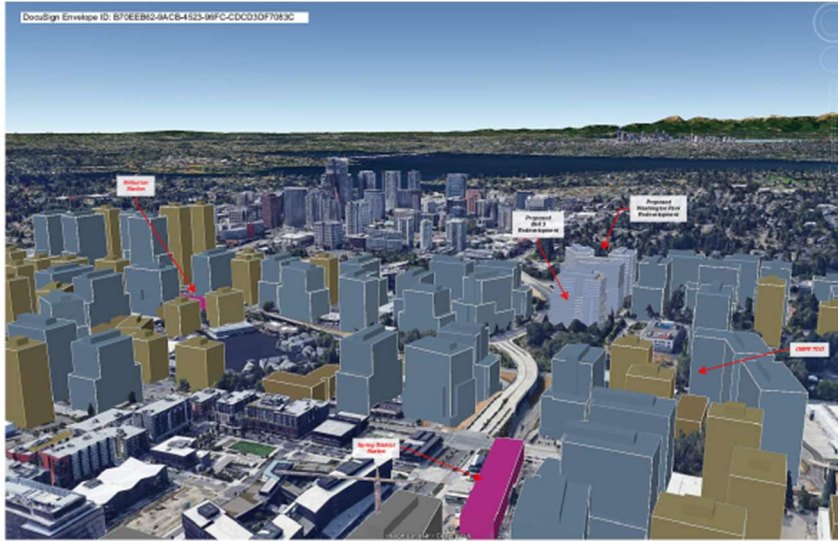
This is a conceptual rendering of future development propensity views. It is not a guarantee of future development. The views are based on current zoning and land use designations. The views are subject to change based on future development and planning. The views are not intended to represent any specific project or development. The views are for informational purposes only. © 2024 MWHAVE. All rights reserved.



O-21

COMMENT

RESPONSE



Future Development Propensity Views

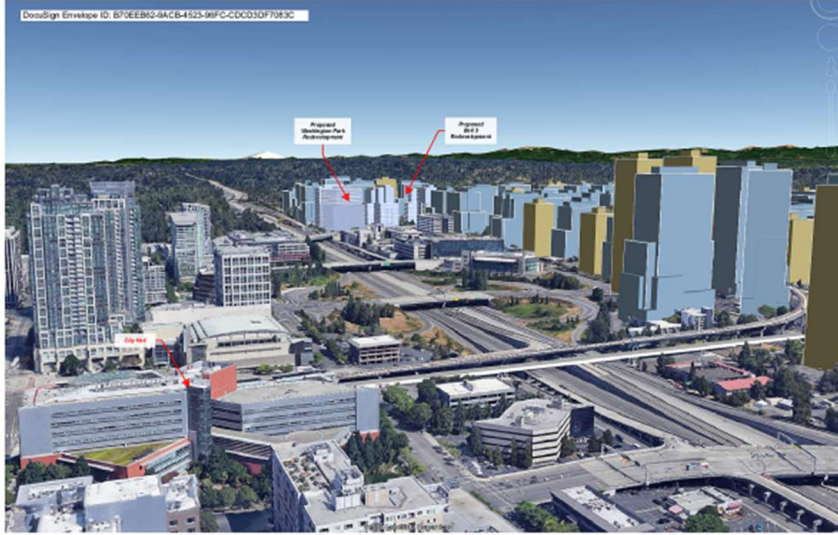
This is a conceptual rendering of future development propensity views. It is not a guarantee of future development. The views are based on current zoning and land use designations. The views are subject to change based on future development and planning. The views are not intended to represent any specific project or development. The views are for informational purposes only. © 2024 MWH Global, Inc. All rights reserved.



O-21

COMMENT

RESPONSE



Future Development Propensity Views

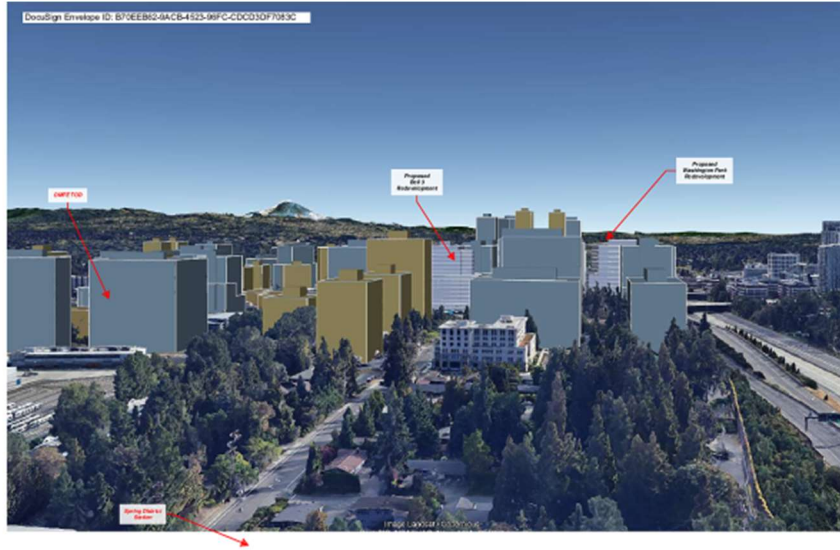
This rendering shows a conceptual view of future development propensity. It is not a guarantee of future development. The rendering is based on current information and is subject to change. The rendering is for informational purposes only and does not constitute an offer of any financial product or service. The rendering is not intended to be used as a basis for any investment decision. The rendering is the property of the City of Bellevue and is not to be reproduced without the City's written permission.

M Metropolitan

O-21

COMMENT

RESPONSE



Future Development Propensity Views

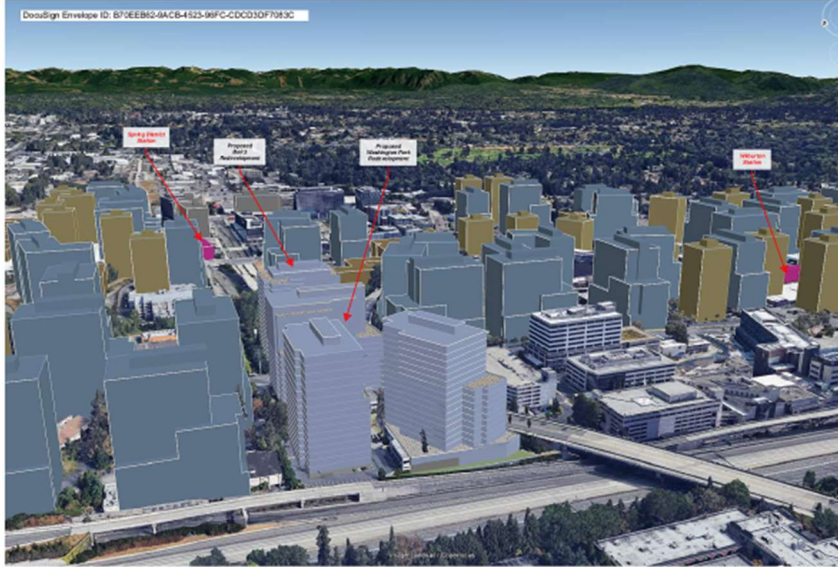
This rendering is for informational purposes only and does not represent any specific project or development. It is intended to provide a general overview of the future development propensity in the area. The rendering is based on the information provided in the DEIS and is subject to change. The rendering is not intended to be used for any other purpose. © 2024 MWH Global, Inc. All rights reserved.



O-21

COMMENT

RESPONSE



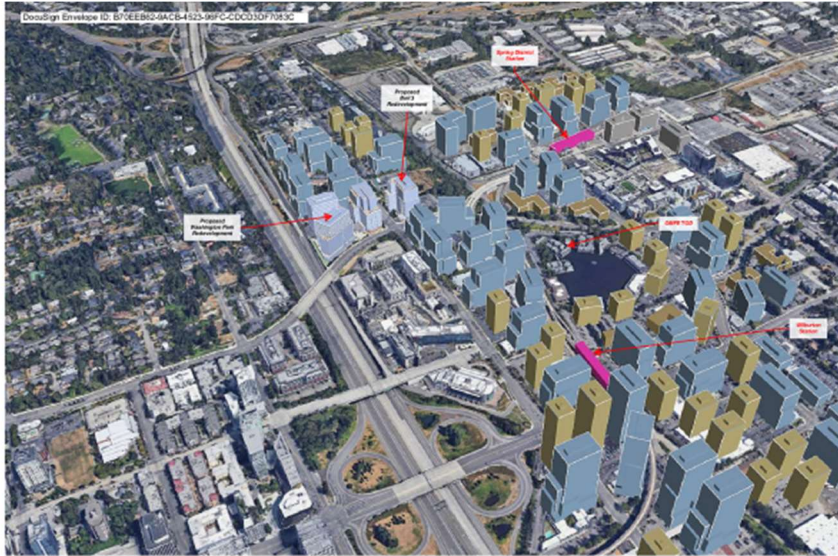
Future Development Propensity Views

This is a conceptual rendering of future development propensity views. It is not a guarantee of future development. The views are based on current data and assumptions. The views are subject to change. The views are not intended to be used for any other purpose. M

O-21

COMMENT

RESPONSE



Future Development Propensity Views

Map data © OpenStreetMap contributors, Imagery © Mapbox
 This development propensity map is a conceptual visualization of potential future development based on various factors including land use, density, and proximity to transit. It is not a guarantee of future development and is subject to change based on future planning and market conditions. For more information, please contact the City of Bellevue Planning Department.

O-22

COMMENT

RESPONSE

O-22-1 | Eastridge Partners wants to thank Staff for their ongoing support in working with interested parties to ensure we collectively find a win - win solution for the Wilburton rezone. We recognize that this is no easy task with sometimes opposing goals and objectives however all parties acknowledge that change will occur and that we must be prepared to get the maximum benefit for the City, its Constituents and the other Eastside cities.

O-22-1 Comment noted.

O-22

COMMENT

RESPONSE

EASTRIDGE PARTNERS LLC

11911 NE 1st St, Suite 101, Bellevue, WA 98005
Phone: 425-462-9400

June 12, 2023

O-22-2 Comment noted.

O-22-3 Comment noted.

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS Comment
Eastridge Partners, LLC – 11811 – 11911 NE 1st Street

Dear Reilly:

On behalf of Eastridge Partners LLC (Eastridge Partners), thank you for the opportunity to comment on the City of Bellevue's (City's) Bellevue 2044 Comprehensive Plan Draft Environmental Impact Statement. Eastridge Partners has been a participant in the visioning for the future of the Wilburton neighborhood since the CAC Committee between 2017-2020. We are pleased to see the City reach this key DEIS milestone in the process. We look forward to the City's Comprehensive Plan adoption and implementation of zoning that will bring this process to a successful conclusion.

Background.

Eastridge Partners owns two parcels at 11811 - 11911 NE 1st Street in Bellevue between NE 1st Street and Main Street (Properties). The Properties total 5 acres. Each parcel is developed with a 1980s' era 3-story office building. The Properties are currently zoned Office and are within the Wilburton/ NE 8th Street Subarea.

O-22-2

O-22-3

O-22

COMMENT

RESPONSE

O-22-4 See Common Response 10 Wilburton Street Grid.

O-22-5 The Preferred Alternative studied in the FEIS includes a future land use designation of RC-M for the property identified. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

Planning Principles.

We continue to believe Wilburton is the City’s best opportunity to accommodate dense growth. It is ideally located for dense growth, adjacent to Downtown, and served by all of the City’s major transportation infrastructure. It is at the intersection of our major highways, and will soon be served by light rail. The City is also improving pedestrian infrastructure in Wilburton with plans for a walking amenity along the BNSF rail line, and the Grand Connection LID. While some infrastructure needs remain in Wilburton, tax revenue from development in the area will facilitate those needed improvements. To that end, the City should not limit block size in the Wilburton area nor impose a street grid to that end; such limitations stagnate market-led development and are impractical on a site-by-site basis. The City should continue to invest in multi-modal forms of transportation and focus on incentive-based regulations that facilitate mixed-use developments.

O-22-4

Comments on the DEIS.

Eastridge Partners’ comment on the DEIS are:

- **Alternative 3 should be the City’s Preferred Alternative, with modifications.**

Alternative 3 best prioritizes smart growth within areas well served by transit. Currently, Alternative 3 shows the Properties as “Residential/Commercial Highrise 1” land use designation. While Eastridge Partners agrees the Properties and their vicinity are most appropriate for proposed designated use. Due to our proximity to the City’s Arboretum and educational infrastructure we encourage the City to consider additional density if affordable housing is included in future developments of our property to help ensure that we meet the City’s long term housing requirements.

O-22-5

The Preferred Alternative should allow for a variety of uses – residential, office, lodging, and retail, without restrictions on the maximum densities of use within the envelope. The City is planning for a 20-year growth horizon. The City should prioritize the flexibility of uses within the general development envelope.

This will allow for market conditions to determine the appropriate uses over time.

O-22

COMMENT

RESPONSE

O-22-6 Comment noted.

- **Wilburton's circulation and permeability system requirements should be flexible and incentive-based to support viable future redevelopment.**

The Wilburton Draft Circulation and Permeability map (Figure 11-28) shows north/south non-motorized connection occurring on the eastern edge of the Properties and another running continuing east from the Properties along NE 1st Avenue towards Wilburton Elementary School. Eastridge Partners agrees that multimodal connectivity to the public and civic assets like Wilburton Hill Park and the Botanical Gardens is a positive for the City and current and future Wilburton residents, employees, and visitors. However, the City must ensure that any non-motorized connections that require access to private property be: (1) flexible in the ultimate design location and not overly prescriptive; (2) include reasonable, defined, and objective standards to provide predictability for future development; and (3) incentive-based to ensure that they are not disincentivizing future redevelopment.

O-22-6

- **Aesthetic mitigation in Wilburton should prioritize smart-growth density. Mitigation measures must be evaluated for impact on development viability.**

The DEIS states that mitigation measures for Aesthetic impacts in Wilburton may include, among other measures: (1) regulations around public spaces; and (2) viewshed regulations for "certain public views." DEIS, pg. 6-62. We encourage the City's Preferred Alternative to focus on aesthetic mitigation, if warranted, through building form and materiality regulations. Wilburton's strategic positioning next to I-405 gives it the advantage of inward facing perspectives, a perfect and logical place to host density and not through prescriptive and excessive upper-story setbacks or new regulations around public spaces or creating viewsheds.

O-22-7

If the Preferred Alternative elects to include regulations around public spaces or viewshed regulations, the DEIS must fully disclose and evaluate those mitigation measures for their impact on the potential for development for affected properties. This will ensure that the City Council has adequate information to evaluate impact and make appropriate policy decisions. Aesthetic mitigation measures should not frustrate the purpose of the added density in Wilburton for housing and jobs by making redevelopment of properties infeasible due to additional regulatory burden.

O-22-7 The city may incorporate some, all or none of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. However, the EIS is a disclosure document, which informs, but does not dictate, the policy decisions that the city may make in the future. See Common Response 19 Zoning Details.

O-22	COMMENT	RESPONSE
O-22-8	<ul style="list-style-type: none"> • <u>Eastridge Partners agrees with the comments included in the Wilburton Owners' Coalition's comment letter and incorporates those by reference.</u> <p>Thank you for the opportunity to comment. We will look forward to the City's continuing work on the Comprehensive Plan and implementation. Please feel free to contact me with any questions.</p> <p>Sincerely, Eastridge Partners, LLC</p> <p><i>Panfilo Morelli</i> s/Panfilo Morelli Partner</p> <p><i>Gardner Morelli</i> s/Gardner Morelli Managing Partner</p>	O-22-8 Comment noted.
O-23	COMMENT	RESPONSE
O-23-2	<p>We would like to be considered a party of record. On the Wilburton Vision Implementation specifically, we would like to see a balance of additional building height that is allowed, especially on the east edge towards existing single family residential areas.</p>	<p>O-23-1 You are added as a party of record.</p> <p>O-23-2 Comment noted.</p>

O-24

COMMENT

RESPONSE



June 11, 2023

City of Bellevue Development Services Department
Attn: Elizabeth Stead
450 110th Ave. NE
Bellevue, WA 98004

RE: 2024-2044, Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Stead,

Thank you for the opportunity to comment on the City of Bellevue's Comprehensive Plan Periodic Update and Wilburton DEIS. We believe it is appropriate for the City to consider long-term development alternatives for the Wilburton area and support mobility and access across all modes in proportion to travel demand. Our comments and questions, as in the past, focus on transportation. In reviewing the transportation chapter in the DEIS, we have several questions and concerns about the plan's mitigation measures and lack of analysis and evidence to support its findings and conclusions.

Our primary concern is that the DEIS does not provide adequate or appropriate mitigation for traffic impacts in any of the proposed alternatives, resulting in a stated plan for intersection failure and gridlock. This is not acceptable.

Section 11.6 of the Comprehensive Plan DEIS focuses on Avoidance, Minimization and Mitigation Measures for the impacts of proposed alternatives. The impacts are entirely on system intersection V/C ratio, primary corridor speed, and state facilities (Table 11-4.0). Mitigation strategies listed do not include a discussion of capacity improvements that are needed to accommodate the City's projected increases in vehicle miles traveled (VMT), or address these significant performance target gaps. The previous Wilburton DEIS, released in 2018, pointed to several capacity improvements that would reduce the V/C ratio at intersections. Capacity solutions to decrease delay at intersections caused by upzoning should be explored in a similar fashion as in 2018.

The Mobility Implementation Plan (MIP) prioritization framework guides Bellevue's mitigation strategy. The DEIS states that, per the MIP, "some gaps (particularly related to System Intersections and Primary Vehicle Corridors) will remain because reducing intersection congestion and increasing vehicle speeds must be balanced against priorities including safety, environmental stewardship, land use impacts, etc." Reducing traffic congestion should not be seen as a separate or competing priority among others listed, but one that is directly related to public safety, environmental stewardship, and land use impacts.

For example, policy decisions that do not prioritize traffic congestion relief and allow vehicular delays to worsen may impact emergency response times and health outcomes for the public. In 2017, Harvard researchers examined 10 years' worth of patient records and analyzed death rates among Americans who had a heart attack or cardiac arrest near a major marathon where there were multiple street closures. They found that ambulance vehicles were delayed by an average 4.4 minutes on marathon days (32% longer than on days not delayed by marathons), which resulted in a spike of 15% higher likelihood of death among non-marathon patients admitted on race day. The researchers noted that every minute counts and while "the study findings do not establish cause and effect between street closures and greater mortality...many studies have shown that even very small delays in

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O-24-1 See FEIS Chapter 11, *Transportation*, for additional information on impacts and potential mitigation measures.

O-24-2 In the Wilburton DEIS in 2018, transportation analysis was based on concurrency standard that has since been repealed and replaced with the Mobility Implementation Plan (MIP). The performance targets and mitigation measures used in this EIS are aligned with the current MIP, adopted in 2022. The Multimodal Concurrency Code looks at the entire transportation network, not just the automobile network, and helps the city optimize transportation across modes. The MIP provides for a process to identify and prioritize for consideration in the Transportation Facilities Plan, project concepts to address performance target gaps. The analysis in the EIS is based on a buildout scenario that shows that the transportation network will not meet the Performance Targets at many system intersections at buildout. However, this is a very conservative approach, and the full build out analyzed in the EIS is not expected to be achieved by 2044. This FEIS does not provide specific projects for any mode to address performance target gaps. Instead, the city's environmental review provides disclosure and analysis of environmental impacts associated with the range of growth alternatives identified in the EIS and mitigation for the impacts identified in the EIS.

O-24-3 See FEIS Chapter 11, *Transportation*. The analysis in the DEIS did not consider a change to the street grid such as closing streets as in the example. The mitigation measures are actions the city can take to improve the effectiveness of all forms of transportation. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

O-24-1

O-24-2

O-24-3

O-24

COMMENT

RESPONSE



O-24-3 | getting care could make the difference between life and death.¹¹ This is an element of safety that is not at odds with reducing traffic congestion. How will DEIS policy choices that allow failed intersection and corridor speed performance targets to "remain," considered alongside the City's other transportation planning documents that guide future projects, cumulatively impact emergency response times in Bellevue?

O-24-4 | The DEIS must include an honest and robust discussion of strategies that will measurably reduce traffic congestion, including existing City-supported transportation projects. This would align with policy TR-2 ("To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users"). TR-2 does not state that the City ought to merely look at or consider congestion impacts to all users, but aim to "reduce" congestion. WAC 197-11-050(1) requires the City to consider the "range of proposed activities, alternatives, and impacts" – this should include an analysis of mitigation strategies, like capacity improvements, that would result in reduced traffic congestion, and can be added to Section 11.6.

O-24-5 | Rather than providing a complete list of mitigation strategies and evidence that they will produce meaningful results, the DEIS provides a partial list of mitigation measures that will be informed by Transportation Demand Management (TDM) strategies, transportation systems operation and management, agency partnerships, parking strategies, and safety strategies. What will each of these measures accomplish in accommodating or even shifting demand?

O-24-6 | Specific to TDM, the DEIS references California Air Pollution Control Officers Association (CAPCOA) research, which suggests TDM programs will produce a 5-10 percent vehicle trip reduction, but the findings in that document are not context-sensitive to Bellevue, do not consider available US Census travel data specific to Bellevue, and are not explained in the DEIS.

O-24-7 | For PMA 1, the DEIS recommends addressing intersection V/C ratios and primary corridor vehicle speeds that don't meet performance targets by focusing "primarily on building out the pedestrian and bicycle network," "exceptional TDM" requirements, "Smart Mobility solutions, and parking code reforms. The notion that "primarily building out the pedestrian and bicycle network" will improve intersection V/C ratios and primary corridor vehicle speeds is not supported by any data or analysis in the DEIS. Bellevue's own modal projections show minimal increases in walking, no increases in biking, and increases in SOV driving among both Bellevue workers and Bellevue residents when comparing the No Action Alternative to Alternative 3 (Table 11-33). It is not appropriate or reasonable to expect bike and pedestrian infrastructure to mitigate expected increases in VMT. The City needs to provide evidence that building out the pedestrian and bike network is an adequate mitigation strategy for higher levels of traffic congestion, or remove this from the mitigation strategies list. Evidence can be provided by showing whether targeted spending on bike and pedestrian infrastructure in Bellevue has, historically, produced intersection and corridor speed improvements in the area where the infrastructure was provided.

O-24-8 | Those who commute to work in Bellevue by car (including workers in poverty, 60% of whom drive alone or carpool to work), as well as emergency responders and freight, will not benefit from bike and pedestrian infrastructure (which they do not use and which could increase traffic congestion in areas where the City plans to convert travel lanes to bike lanes).

O-24-9 | Further straining the analysis contained in the DEIS is the assumption that proposed high-rise buildings densely placed between NE 4th and NE 8th (critical service corridors for emergency responders, freight and commuters) without planned capacity improvements will not have detrimental impacts on transportation in Bellevue.

¹¹"Delays in Emergency Care and Mortality during Major U.S. Marathons," by Anupam B. Jena, M.D., Ph.D., N. Clay Mann, Ph.D., et al., The New England Journal of Medicine, April 13, 2017, at <https://www.nejm.org/doi/full/10.1056/NEJMoa1614073>.

O-24-4 | See FEIS Chapter 11, *Transportation*. The analysis in the EIS does not include analysis of changes to the street network or capacity. Mitigation measure outline actions the city can take to reduce congestion impacts and improve the travel experience for all. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

O-24-5 | The mitigation measures are actions the city can take to reduce the impact of the potential changes. The actions have varying degrees of impact on traffic and other environmental concerns. It is possible for the city to choose to include some, all, or none of these measures in the update to the Comprehensive Plan. It is also possible for the city to take other actions to reduce the impact on traffic and other environmental concerns.

O-24-6 | The evaluation of the effectiveness of the mitigation measures is not within the scope of this EIS. The California study indicated that TDM programs may be effective at reducing vehicle trips.

O-24-7 | This analysis is outside of the scope of the EIS. The EIS is a document to disclose the potential impact of the proposed program on the environment. The mitigation measures are actions the city can take to reduce the impact to varying degrees. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations.

O-24-8 | The Mobility Implementation Plan provides the vision for a complete and connected multimodal transportation network throughout the city. The Bike Bellevue project (Transportation Commission beginning in September 2023) will provide design concepts and transportation network analysis for new bicycle facilities in the Urban Core.

O-24-9 | See FEIS Chapter 11, *Transportation*. The informed build out of the area referenced under all alternatives would have an impact on transportation.

O-24

COMMENT

RESPONSE



O-24-10

Given the lack of information in the DEIS on capacity improvements that would help mitigate some of the expected pressure on Bellevue's transportation network, it is not surprising to see Table 11-40 showing multiple intersections, primary vehicle corridor speeds, and state facilities that will be significantly impacted from all action alternatives and which will therefore not meet respective performance targets. It is, however, surprising that the DEIS simply dismisses this reality, stating that, "While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities would remain."

This is a plan for transportation failure, with proposed mitigation measures that are unlikely to mitigate the more significant traffic problems the DEIS projects will occur.

The City must propose adequate mitigation to reduce traffic congestion, comply with TR-2, and prevent intersection and corridor failure. We do not agree that it is acceptable for these significant adverse impacts to "remain" or to become exacerbated by the cumulative impacts of proposed changes in the comprehensive plan and other City planning documents.

O-24-11

Bellevue is a beautiful, growing city. The policy decisions made today can either improve or deteriorate future mobility and access, which is central to Bellevue's economic growth and success. For any growth alternative that is selected, please consider providing adequate transportation mitigation that expands arterials and strategically adds capacity to areas that are already gridlocked during peak hours of the day in order to accommodate the vehicular demand the City anticipates over the next two decades.

Sincerely,

Mariya Frost
Director of Transportation
Kemper Development Company

O-24-10 See FEIS Chapter 11, *Transportation*, for updated information on potential impacts and mitigation measures.

O-24-11 The EIS discloses potential mitigation measures for the transportation-related environmental impacts associated with the growth alternatives studied in the EIS. The EIS is a document to disclose the potential environmental impacts related to the proposed non-project program. In turn, the mitigation measures are actions the city can take to reduce the identified impact to varying degrees. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

O-25

COMMENT

RESPONSE

O-25-1 Comment noted.

O-25-2 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-L on the property identified. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.



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June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

**RE: Bellevue 2044 Comprehensive Plan DEIS Comment
 North Towne Shopping Center – 2620 Bellevue Way NE**

Dear Reilly:

Thank you for the opportunity to comment on the City of Bellevue's 044 Comprehensive Plan Draft Environmental Impact Statement (DEIS). We are writing to comment on the DEIS evaluation related to the North Towne Shopping Center at 2620 Bellevue Way NE (Property), specifically, support for Alternative 3 with modifications to support more mixed-use opportunities.

The Property is approximately 3.2 acres along Bellevue Way NE and is abutting the City's Northtowne Neighborhood Park to the north and existing residential areas to the east and south.

Our comments on the DEIS are:

- **Alternative 3 should be the City's Preferred Alternative as modified for the Northtowne Shopping Center as a Mixed-Use Midrise land use designation.**

Alternative 3 best prioritizes smart growth within areas well served by transit. Currently, Alternative 3 includes the Property as "Mixed Use – Lowrise," which would support a mixture of residential and commercial uses at up to four stories.

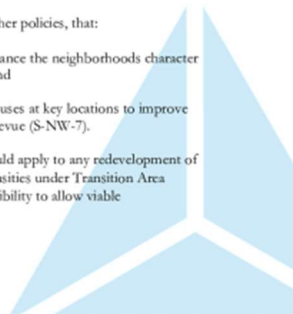
We encourage the City's Preferred Alternative for the Property to be Mixed Use – Midrise, which would allow for densities of up to seven stories. We agree that the Property's future is best as a mixed-use center with flexibility modernization with a mixture of commercial and residential uses. As you know, North Towne Shopping Center is a destination shopping and services hub for the Northwest Bellevue area.

The Northwest Bellevue Subarea Plan provides, among other policies, that:

- Encourage new development to maintain and enhance the neighborhoods character of the individual sub-neighborhoods (S-NW-6); and
- Explore opportunities for small-scale commercial uses at key locations to improve access to goods and services throughout NW Bellevue (S-NW-7).

The City's Transition Area Design District regulations would apply to any redevelopment of the Property. Redevelopment at Mixed Use – Lowrise densities under Transition Area standards is unlikely to support sufficient capacity and flexibility to allow viable

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O-25-1

O-25-2

O-25

COMMENT

RESPONSE

O-25-3 See Common Response 4 Housing Alternatives.

O-25-3



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redevelopment, particularly if a new project hoped to attract a destination grocer tenant to continue to provide services for Northwest Bellevue.

The City's Preferred Alternative should apply a Mixed Use – Midrise designation to the Property, which would provide more flexibility and opportunities to develop context sensitive mixed-uses projects with vibrant ground floor commercial uses, while still applying Transition Area standards for compatibility with residential uses.

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

Sincerely,

Richard Leider
Trinity Real Estate, LLC
Member

Pete Stone
Trinity Real Estate, LLC
Member

Lex Wieneke
Trinity Real Estate, LLC
Member

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O-26

COMMENT

RESPONSE

McCULLOUGH HILL, PLLC

June 12, 2023

Reilly Pittman
 Planning Manager
 City of Bellevue
 Department of Community Development
 450 110th Avenue NE
 Bellevue, WA 98004
 Via Email: compplan2044eis@bellevuewa.gov

Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS
 McCullough Hill Bel-Red properties comment letter

Dear Reilly:

Thank you for your work on the Bellevue 2040 Comprehensive Plan DEIS. McCullough Hill represents several property owners in the Bel-Red area and would like to submit the following comments on their behalf.

O-26-1 |
 O-26-2 |
 O-26-3 |
 O-26-4 |
 O-26-5 |
 O-26-6 |

- We endorse Alternative 3.
- The DEIS's FAR and density assumptions must be disclosed in the FEIS, as well as any economic analyses performed as part of the affordable housing discussion.
- The Comprehensive Plan appears to carry forward the City's current approach to the Future Land Use Map, which is to match implementing zones exactly. In the FEIS, study an approach that designates all Bel-Red properties as "BR" with a variety of implementing zones with locational criteria. This would simplify future planning and zoning efforts and allow for City and property owner flexibility in the future.
- The City should be less restrictive with uses in the Bel-Red area. Rather than being prescriptive about office, retail, and residential use, allow uses generally in this urban neighborhood.
- The City must review the land uses, heights, and densities being studied in the City of Redmond's Comprehensive Plan update for the Overlake neighborhood, and consider that information in the FEIS. Bellevue has limited heights and densities on its side of the border, while Redmond has fully embraced the transit-oriented development vision for the Overlake neighborhood. Much of the Bellevue side of the Overlake neighborhood is within walking distance to the Overlake station; densities should be planned in that area as if they were within walking distance of the Bel-Red or Wilburton stations.
- There is a large area in Bel-Red that remains designated "O" for Office. Office zones are not designated in Alternative 3 for any growth or more flexible uses. This is a lost opportunity in the 20-year horizon. Consider O zones as MU zones, or allow for significant additional growth in these O zones which are likely to redevelop in the 20 year horizon.
- Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Northup Way corridor and the NE 24th corridor may have more transit in the future running locally between Bellevue/Kirkland/Redmond. BR-GC is 1-2 story strip center zoning and is

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- O-26-1 Comment noted.
- O-26-2 See Common Response 4 Housing Alternatives for a discussion of how affordable housing was analyzed in the EIS. See Common Response 5 Assumption of Buildout.
- O-26-3 See Common Response 18 Future Land Use Categories.
- O-26-4 The City of Redmond is undergoing a separate Comprehensive Plan update, including an EIS, and is outside of Bellevue's jurisdiction. Staff from the two cities do meet and share information regularly.
- O-26-5 There are no areas in the BelRed Neighborhood Area with a future land use designation of O in the Preferred Alternative. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more details on future land use classifications.
- O-26-6 See Common Response 19 Zoning Details.

O-26

COMMENT

RESPONSE

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Page 2

O-26-6

proposed to remain for the next 20 years in Bel-Red. This seems to be a lost opportunity. Consider the R-High designation or an MU designation along this and other similar corridors.

- The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NIE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS fails to disclose and evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan's vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS must evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.

O-26-7

- **Critical Areas/Stormwater/Trees.** The EIS will be inadequate unless the City analyzes impacts to critical areas; the current 4-page memorandum in the Appendix is not enough. The City must study implementation of the following:

O-26-8

- Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue.
- The "critical areas penalty" should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review.
- The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code are weak and do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20- or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decisionmakers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City's current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue.
- Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the DEIS's subsequent LUCA amendments are in place. All Mixed-Use Centers should be exempt like downtown is exempt.
- Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Bel-Red regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

O-26-10

O-26-11

O-26-7

The city's Comprehensive Plan must be in compliance with the State Growth Management Act, the Puget Sound Regional Council's Vision 2050, and King County's Countywide Planning Policies. The FEIS includes analysis of the impacts of recent state legislation including HB 1220, HB 1110, and HB 1337. Changes to the Comprehensive Plan policies will come after the publication of the FEIS.

O-26-8

See Common Response 16 Critical Areas.

O-26-9

Potential changes to the City's development regulations in BelRed, including the city's development regulations, critical areas protections, and incentives that would apply to site-specific project proposals in BelRed are outside the scope of the EIS.

O-26-10

Analysis of revisions to the Tree Code are outside the scope of the EIS process.

O-26-11

Potential changes to the City's stormwater or other project-specific development regulations are outside the scope of the EIS. See Common Response 19 Zoning Details.

O-26

COMMENT

RESPONSE

June 12, 2023
Page 3

O-26-12

- **Housing Affordability**

- Any approach to affordable housing must be legal, and should consider the velocity at which residential units can be developed. The FEIS should analyze any affordable housing program in the context of existing and contemplated Bellevue zoning regulations—affordable housing is just one portion of the incentive “stack,” and projects cannot afford to provide every incentive. For example, in Bel-Red, properties are often burdened by stream buffers and road requirements. Adding affordable housing requirements to this mix may create an unbuildable project.

O-26-13

- **State Legislation Analysis / General SEPA**

- Please analyze the recently passed state laws related to SEPA thresholds, design review, permitting reform and the like, to ensure that these new regulations can be implemented as soon as possible in Bellevue.
- Mitigation is not required as part of an FEIS; it is

O-26-14

- **Transportation:**

- The transportation analysis presumed 100% buildout, which is an exceedingly conservative study. We support the City’s reliance on the mitigation strategies disclosed in the DEIS related to bicycle and pedestrian improvements and the use of transportation demand management strategies.
- We believe that the existing “required” road grid in Bel-Red should be studied and reconsidered. It has been exceedingly difficult to build a road grid in Bel-Red after 10 years of zoning implementation, again due to the fact that the proposed road grid had no regard for property boundaries, steep slopes, or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.

O-26-15

We appreciate this opportunity to comment and look forward to working with you in the next stages of Comprehensive Plan adoption and implementation.

Sincerely,

McCullough Hill, PLLC

O-26-12 See Common Response 4 Housing Alternatives.

O-26-13 The Determination of Significance was issued on September 29, 2022. The FEIS complies with all the requirements for an EIS as of that date. See Common Response 4 Housing Alternatives.

O-26-14 The EIS is a disclosure document, disclosing potential impacts of the development. As the EIS explains, all development analyzed under the build out scenario utilized by the EIS will likely not occur during the planning period.

O-26-15 See Common Response 17 BelRed Street Grid.

O-27

COMMENT

RESPONSE

O-27-1 Comment noted.

O-27-2 Comment noted. All of the alternatives include higher density around light rail stations.

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June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: *Bellevue 2044 Comprehensive Plan DEIS Comments*

Dear Liz and Reilly,

We are writing in reference to the 2044 comp plan and specifically the DEIS on the Wilburton upzone. Weber Thompson is a 70-person interdisciplinary design firm focused on multifamily housing, with a huge portfolio of projects at scales from two story townhomes to 50 story towers in Bellevue and Seattle. Our team have designed a large portion of the residential towers in Seattle over the last two decades, have conducted hundreds of feasibilities, and just finished the first fully affordable housing high-rise in Seattle in the last 50 years. We are devoted to multifamily housing in the region and would like to leverage our expertise and thoughts on the current draft to help the City of Bellevue realize their vision and goals for housing. Our hope is that the City can evolve their zoning standards to create a new model for the region that encourages a mix of housing types, density, and bold design to set a precedent for the region and nation. A few of our suggestions from decades of work are below; we hope to be a part of the discussion in the future:

Should you have the signature here? If not, you need it at the end.

1. Create a variety of scales, density and building types around nodes and stations in lieu of blanket upzoning.

We realize the current DEIS was performed years ago and does not reflect the current landscape of the City, but we hope you consider re-evaluating the zoning alternatives to create varieties in scale and zoning heights for Wilburton. While Alternative 3 best represents the right direction, it places the highest density near I-405 and separated from bike and rail routes by several major roads. The absolute highest density should ideally be located around the new light rail stations and Eastrail bike corridor, and not around I-405 and major streets that are hurdles for pedestrians. Bellevue is built around the

O-27-1

O-27-2

O-27

COMMENT

RESPONSE

O-27-3 Comment noted. See Common Response 4 Housing Alternatives.

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O-27-3

automobile, and this kind of planning only furthers that. Putting density near the grand connection over I-405 is good but should be maximized near public transport. Locating the highest density adjacent to light rail stations – a model Burnaby, Surrey and Brentwood, BC have all embraced – has been highly successful in encouraging density where needed. Added density around the Wilburton station, not several blocks away, is critical for safety and ease of use. To further the concept, density should be re-distributed near other major corridors and nodes of development, encouraging mixes of uses instead of large fields of mid-rise buildings. The Spring District should be acknowledged as a dense work hub, with increased density and height between it and Lake Bellevue to create a mix of building scales and uses. Recognize the new East Main developments, light rail and zoning to connect over I-405 to that station and development. At the edges and farther from those stations, reduce density to blend scales and create a larger mix of housing types. Please refer to the attached diagram.

O-27-4 Potential changes to the City's project-specific development regulations and incentives are outside the scope of the EIS and may be considered when those codes and regulations are updated. See Common Response 18 Future Land Use Categories.

O-27-4

2. Align zoning heights with real building standards and codes to optimize value.

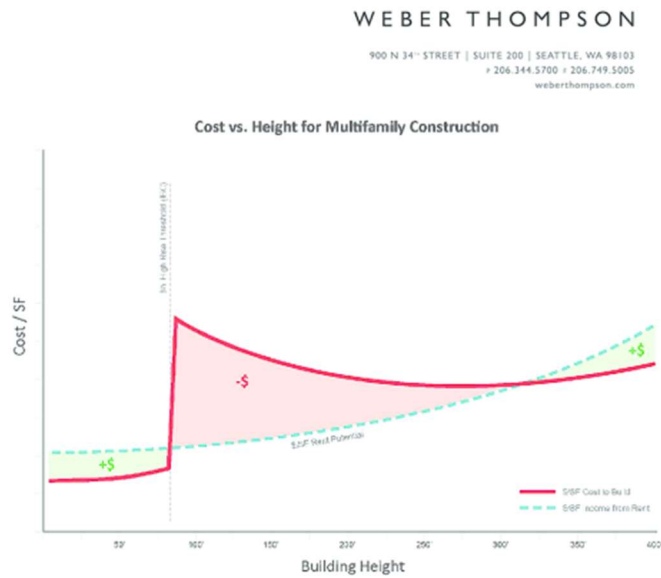
The 90'-160' building height is challenging for developers from a financial standpoint; it is the main reason very few projects pursue that height. Per the IBC (International Building Code), which Bellevue uses as the basis for its building code, any structure over 75' from the highest occupied floor (which typically results in a building height of about 85') requires high-rise building systems. These systems quickly increase the cost of a building, and severely limit their viability until the buildings reach a height where the added efficiency and rent premiums justify those costs. The graph below explains the current cost curve for multifamily buildings and why that scale is difficult to build and finance. With Type IV-B mass timber construction that can reach 180' we are starting to see major interest in the scale between 160'-180', so considerations for this new low carbon building typology should be accommodated and incentivized.

O-27

COMMENT

RESPONSE

O-27-5 See Response to O-27-4.



Recommended zoning heights:

- **45'-55'** is a good boundary zone height and allows 4-5 floors with a 15' retail floor at the base to allow activation.
- **70-85'** are the max for Type III-A and Type V-A wood construction (typically referred to as "5 over 2" or "podium-style" buildings).
 - Allow adequate overrun heights above this for elevators and mechanical equipment which are the only things allowed to exceed those heights. 16' minimum.
- **160-180'** is the max for Type IV-B mass timber with exposed wood structure. This is what we foresee as the next big building typology in the region as it uses far less carbon than concrete, creates warm natural, inviting wood spaces, and can be constructed much faster.
 - Create incentives to encourage this new innovative building type.

O-27-5

O-27

COMMENT

RESPONSE

O-27-6 See Response to O-27-4. See Common Response 19 Zoning Details.

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- o To make these financially feasible, they need larger floorplates. Allow this building typology to exceed tower floorplates and go up to 16-20k.
- **240'** is the next trigger where development of buildings changes. At 240' a tower needs to go through structural peer review, increasing both the process, time and cost to build.
 - o Allow large floorplates beyond 15,000 SF
 - o These are a great height and provide excellent efficiency for high-rise affordable housing. The larger floorplates create more value for affordable projects and allow lower \$/SF.
 - Perhaps consider allowing additional floor plate size for affordable housing
- **450'** is an ideal height for high-rise residential, and it allows for a standard shear core design.
 - o Remove FAR for the highest density residential zones. FAR requirements create massive assemblages of sites to create a single tower, drastically increasing land costs (driving up rent), while creating sprawl and disconnected ground planes with buildings separated by long distances.
 - The metrics of office vs. residential are very different, and if treated equally like in the current downtown zoning code, you end up without a mix of building types and uses like in the current Bellevue downtown pipeline.
 - Residential towers in Downtown Seattle are FAR exempt, and many times would have a FAR over 35 if actually calculated.
 - o The varying trigger height provisions are almost always just averaged since stepping a tower form is difficult, costly, and inefficient. If these are removed, and there is a defined limit for towers over 240', that trigger height won't make the floorplate size different on every site.
 - A 12,500 SF plate is ideal for this height range with a shear core, two stairs, a single perimeter line of columns and optimal unit depths. This number should be allowed to be averaged to increase flexibility for unique design. This achieves both the slender buildings the city desires and allows for predictable, efficient plates.
 - o 20' for mechanical is not enough for towers this height; elevator over-runs for this height are typically 40'.
 - o To make these towers more energy efficient, allow incentives for energy performance beyond PV, the small footprint and massive mechanical requirements typically take the full roof area of these structures.
 - Consider special incentives for district and shared energy systems.
 - Consider incentives for façade-mounted or -integrated PV, which has a very high cost threshold.

O-27-6

O-27

COMMENT

RESPONSE

O-27-7 See Response O-27-4. See Common Response 19 Zoning Details.

O-27-8 See Response to O-27-4.

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3. How can zoning create a more viable affordable housing market, what have we learned on over a dozen projects and how can zoning and policy change that:

- How F.A.R. hurts affordability:
 - Every comparable size of building still has to meet building codes and has the same structure, waterproofing, fire systems, egress, ADA requirements, etc. The only variable is the finishes, so with an equal FAR for different rent profiles the highest \$/SF is nearly always the financially viable option. There needs to be significant area incentives to make projects affordable and justify lower \$/SF rent. The costs for construction vary little between market rate and affordable.
- Parking requirements have deterred residential development, especially affordable housing, in Bellevue for years. With the cost to build a parking stall frequently over \$50k each, it creates a huge burden on developing housing in Bellevue. Considered allowing market forces and housing types to dictate parking. In Seattle's downtown for example, where zero parking is required, the market still demands a roughly 0.6 per stall ratio for market rate apartments, but low income requires none. Allow that money to go towards actual housing, not parking garages.
 - Why require any parking next to a hub of light rail stations, bus routes and bike + pedestrian corridors?
- 80' tower floorplate restrictions should be removed and instead a tiered approach should be adopted. Allow 18-20k floorplates up to 160', and then incrementally step down. As stated above, the cost to construct a short tower in the 100'-240' is a tough financial proposition due to the high-rise systems required and limited floor area to generate rent to pay for them. The cost for towers is not linear, and the highest dollar per square foot is for the shortest tower (anything over 75' to the highest occupied floor is technically a high-rise by the International Building Code and requires all the associated systems). Allow dynamic sizing to accommodate, see the graph in Section 1.
- No one building type is perfect for affordable housing, create diversity in scales so that different approaches can be used to address this issue.
- Remove MDP requirements if a developer wants to add both a market rate and affordable building on their site; they just adds cost and make the project less affordable. All of the same planning can be part of the ADR.

O-27-7

4. Other notes and comments to consider:

- Provide provisions and incentives for innovative and carbon lowering building practices like modular construction, mass timber construction, and flexibility for new systems as they are developed.

O-27-8

O-27

COMMENT

RESPONSE

O-27-9 See Response to O-27-4. See Common Response 19 Zoning Details.

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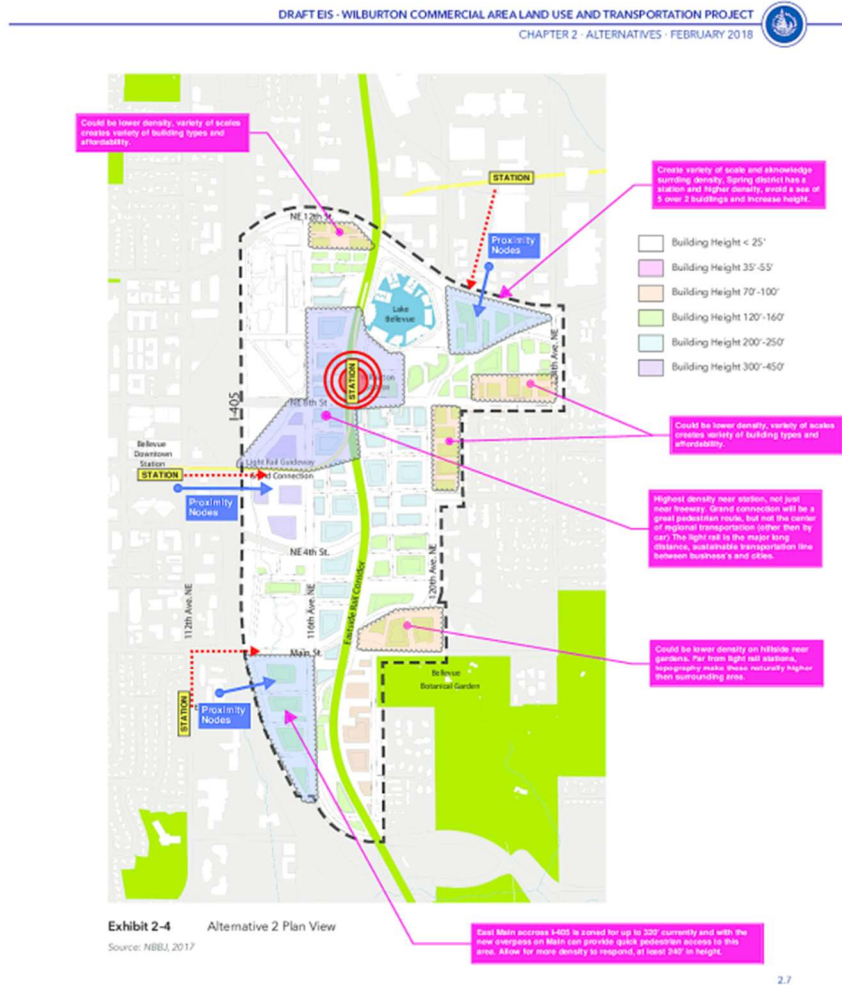
- Incentivize open space instead of making it a burden for small sites and affordable housing. Current codes contradict each other with build-to lines and massive open space requirements that planners request along the street fronts.
- Encourage mixed uses that allows reduced travel and encourages walking and biking, and complements and supports multiple transit options.
 - Remove residential FAR in high density zones to encourage residential over office or hotel, one example of true mixed-use.
 - Allow connections above grade, so buildings can create a horizontal network of spaces at multiple levels and allow easier pedestrian access over roads, alleys, etc.
 - Create incentives for public uses beyond the ground level, imagine how can high-rise buildings create an interconnected network of spaces rather than only private spaces. Is t
 - Retail should be exempt anywhere in the building, not just at grade.

O-27-9

O-27

COMMENT

RESPONSE



O-28

COMMENT

RESPONSE

O-28-1 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-OR-H-2. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the future land use designations.



June 9, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1150 124th Avenue NE in Bel-Red

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Swire Coca-Cola ("Swire") as part of the public comment process for the City of Bellevue ("City") 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). We recently provided written and oral testimony to the Planning Commission on the DEIS and appreciate the opportunity to expand upon our testimony in this Comment Letter. We are asking the City to identify the BR-OR-H-2 designation for our property in the FEIS Preferred Alternative because of its size and proximity to transit, as further explained below. If zoned correctly, our property presents a truly transformational development opportunity representing several billion dollars of investment that would benefit the City for the next hundred years.

As anticipated in our written testimony to the Planning Commission, this Comment Letter is supplemented by a detailed study by our architect, NBBJ, which demonstrates the potential future development opportunity on our property with BR-OR-H-2 zoning (attached as [Exhibit 1](#), 23-30). Building on that study we offer the following DEIS comments.

I. Background

Swire Coca-Cola sells and distributes Coca-Cola products throughout the Intermountain West. As a member of the Swire Group of companies, we are part of a larger business that has operations around the world in industries as diverse as property, beverages, and aviation. Our properties division is a leading developer, owner and operator of mixed-use, principally commercial properties.

Swire Coca-Cola USA DEIS Comment Letter Final page 1
 ND: 23765.002.4877-0942-6281v1



O-28-1

O-28

COMMENT

RESPONSE

O-28-2 Comment noted.

O-28-3 See Common Response 19 Zoning Details.



Swire owns the Coca-Cola bottling plant property at 1150 124th Avenue NE in Bel-Red (the “Site” or the “Swire Site”). The Swire Site is the single biggest underdeveloped site in Bel-Red totaling over 20 acres, and it is one of the largest sites in the City for potential redevelopment. It is located immediately across 124th Avenue NE from The Spring District. The entire property has excellent transit access on Bel-Red road, and is within a 10-minute walkshed from both The Spring District/120th Sound Transit light rail station and the Bel-Red/130th station. (See DEIS Fig. 11-14).

O-28-2

Swire originally purchased the Site in 2017 with no plans for redevelopment. Since then, the City has proceeded with its Comprehensive Plan Periodic Update, that will pave the way for the long-awaited Bel-Red “Look Forward” to align zoning with modified future land use map designations. We recognize the community is changing and we want to be good partners with Bellevue as it plans for future growth. With so much potential for change in Bellevue in the coming years, we now view the Site for potential development. To better serve customers in every community across the growing region and to be a good partner in achieving Bellevue’s growth plans – Swire Coca-Cola recognizes our business may operate more optimally from other areas in Washington.

II. DEIS Comments

I. The Preferred Alternative should identify the BR-OR-H-2 designation for the Swire Site due to its large size and transit proximity.

O-28-3

The City’s three action alternatives in the Draft EIS would allow additional density on the Swire Site compared to current zoning, but none of them go far enough to capture the Site’ full development potential. The Site is nearly the size of the adjacent Spring District, and, if zoned correctly, could deliver several thousand housing units, more than a million square feet of commercial office or life sciences space, and more than a hundred fifty thousand square feet of public open space adjacent to a city park. To achieve this, the Preferred Alternative in the FEIS should identify the Swire site for BR-OR-H-2 future land use map designation with a 24-story-plus height limit and supporting density to facilitate a robust development incorporating high rise residential towers, office buildings, retail, infrastructure and services.

The BR-OR-H-2 designation is particularly appropriate for the Swire Site given its proximity to light rail and other dense, mixed-use development (both realized and anticipated development). The BR-OR-H-2 zoning designation will provide appropriate flexibility in uses, including a robust mix of commercial and residential buildings. This designation is also more consistent with the Comprehensive Plan vision that promotes a healthy mix of office and residential uses in this node proximate to the 120th light rail station. Further, a single zoning designation for the Site is preferable to split zoning and ensures it can be master planned effectively to construct infrastructure across multiple phases, respond appropriately to site conditions, and plan for adjacent uses.

NBBJ’s study captures what development of the Site could look like with BR-OR-H-2 zoning. A mixed-use community is envisioned with office buildings on the west side of the Site to complement The Spring District



O-28

COMMENT

RESPONSE



O-28-4 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

O-28-5 See Common Response 5 Assumption of Buildout and Common Response 19, Zoning Details. The FEIS includes an analysis of mandatory and incentive-based affordable housing systems (see Common Response 4 Housing Alternatives). This will inform future work on details of zoning such as FAR in mixed use areas such as BelRed.

O-28-4

and residential towers on the east side surrounding a significant central open space park. The development heights envisioned range within the maximum story height, and would complement identified 14-story lower height to the east because of sloping topography. See Exhibit 1 at 26. Based on the high-level metrics provided, such a project could fit within the BR-OR-H-2 designation's 24 story height limit, and deliver 3,200 housing units and nearly 6,000 jobs based on a 60% residential / 40% office split. If the MFTE program is used, then 640 of the housing units could be affordable workforce housing.

2. The FEIS Preferred Alternative should disclose density assumptions and should study FARs that will achieve efficient development at the heights envisioned.

The DEIS does not identify the Floor Area Ratio ("FAR") or dwelling unit per acre limits assumed as part of the zoning designations that will implement the City's identified future land use map designations. This is a significant shortcoming of the DEIS analysis. Most zoning in the City currently regulates development intensity with both height and FAR or dwelling unit per acre limitations. The DEIS only discloses an assumed number of stories that corresponds to an assumed height limit (DEIS Appendix B notes "story" heights are around 10 feet for residential uses and 12 feet for commercial development), but does not identify any other development standard limits assumed. In order to validate that the assumed heights/stories are achievable in future development, the City should identify the FAR or dwelling unit per acre and other development standards proposed.

O-28-5

Further, the City should consider revising all dwelling unit per acre limits to a FAR measurement City-wide. The dwelling unit per acre standard is outdated and more appropriate in a suburban jurisdiction as it encourages larger dwellings rather than dense, urban development. The DEIS acknowledges that the City needs to grow three times faster in the next two decades than in the prior two decades and so it must move away from suburban standards.

Similarly, the City should also consider removing a FAR limit for residential uses. It is difficult to precisely calibrate residential heights and FARs because of unique site conditions. Removing a FAR limit as an additional barrier to housing production will ensure residential development is maximized to the heights envisioned. As part of removing a specific FAR limit for residential development, the City should also study recalibrating its incentive system in the Preferred Alternative in two ways: (1) modifying the incentives themselves to reflect current City priorities, including affordable housing, sustainability measures, and parks and opens spaces, and (2) moving to an incentive system that requires participation based on development above a "trigger height" similar to Downtown zoning. Such a system would ensure development delivers public benefits that reflect the City's greatest needs and priorities. An incentive-based system is also better than a mandatory inclusionary housing scheme (identified as a component of Alternative 3) because it does not carry the risk of foreclosing all development if calibrated improperly.



O-28

COMMENT

RESPONSE

O-28-6 See Common Response 17 BelRed Street Grid.



3. New Bel-Red developments should be granted latitude to identify appropriate multi-modal infrastructure within the block limit, and Bellevue should support the use of service alleys (and larger service alley networks) as the City continues to densify.

A historic problem with the existing Bel-Red zoning is a rigid local street grid. We were pleased to see that the City's transportation analysis for Bel-Red does not appear to rely on additional, prescriptive, local street connections. This approach should be carried forward in the Preferred Alternative study in the FEIS. Large development sites like the Swire Site should be granted flexibility to plan internal streets, pedestrian, bicycle, and service connections in the manner that best fits the site conditions, surroundings, and development objectives. The NBBJ study reflects one such way connections could be planned, but there are numerous. See [Exhibit 1](#) at 15.

Swire further requests that the City support the use of private service alleys and alley networks in new master-planned developments and study the use of service alleys in the FEIS transportation analysis. Currently, the City does not have a concept of alleys in its street manual—instead, the lowest street type are private streets that require sidewalks on both sides. These private streets are wider than what is efficient for a service alley. The result of this is that back of house services cannot be efficiently consolidated and coordinated with adjacent buildings, and essential utility functions must be accessed from streets, which can increase congestion.

The proposed alley network on the Swire Site envisions alleys as service-oriented and providing increased functionality of the street network. See [Exhibit 1](#) at 15. These are 20-foot-wide service-focused only and do not provide cut-through vehicle and pedestrian connections. Bellevue should embrace alleys, especially on the Swire Site, as a way to improve efficiency and create a more modern, urban and streamlined streetscape. The City should identify alleys in the FEIS mitigation measures for general land use and transportation impacts. It is one more tool in the land use toolbox to create expanded service connections and lessen congestion on our streets that should be supported in the City.

Last, we note that the identified mitigation measures in the City's transportation analysis place a primary focus on Transportation Demand Management rather than building additional street capacity. (DEIS at 11-117). We applaud the City for this focus and request the City carry-forward this prioritization in the FEIS for Bel-Red. We believe best way to reduce transportation impacts and congestion is to place density near transit and to complete robust multi-modal improvements. The potential Swire Site development will do both if zoned with BR-OR-H-2 zoning: it will complete an internal infrastructure system that will move pedestrians and bicycles in and through the site, and it will also place appropriate density within a 10 minute walk of two regional light rail stops. This is the right approach to adding density and it should be incorporated into the FEIS Preferred Alternative.

O-28-6



O-28

COMMENT

RESPONSE

O-28-7 See Common Response 5 Assumption of Buildout and Common Response 19 Zoning Details.

O-28-8 See Common Response 16 Critical Areas.



4. The FEIS should include increased floor plate sizes in the Preferred Alternative to promote more efficient and flexibly designed buildings in Bellevue.

Like FAR assumptions, the City must disclose other development standard assumptions in the FEIS for the Preferred Alternative to validate the development capacity assumed. Alongside this, the City should study increased floor plate sizes compared to floor plates in existing zoning and disclose those figures in the FEIS. Larger floorplates will result in more efficient building forms, more design flexibility, and reduce bulk and scale at the neighborhood level through efficient site design and planning.

O-28-7

As written, it is unclear what floor plates sizes have already been assumed by the City in the DEIS alternatives. Disclosing this analysis, and considering increased floor plate sizes in the FEIS compared to current zoning standards, is essential to confirm the City's development assumptions are feasible. More specifically, *the City should study floor plate sizes of up to 14,000 sq. ft. for residential uses between 85' and up to 240' and include this figure in the FEIS shadow analysis.* Swire believes that a 14,000 sq. ft. floor plates maximum for residential buildings strikes the correct balance between much needed efficiently constructed density to hit housing targets while also maintaining thoughtful building design. The City should also increase the flexibility for connected floorplates in all buildings up to 160' or 180' using light gauge steel or cross-laminated timber construction types.

5. The City should identify revisions to its Critical Areas Ordinance to align its steep slope provisions with best available science.

The Swire Site is burdened by naturally occurring and man-made steep slopes, both of which are currently recognized as environmentally critical areas under the Bellevue Land Use Code ("LUC") in the Critical Areas Ordinance ("CAO"), LUC 20.25H. See [Exhibit I](#) at 12. As written, the CAO fails to distinguish between manmade and naturally occurring steep slopes, and both require buffers, setbacks, and reduce development capacity (the "CAO development penalty"). Manmade steep slopes should not be subject to the CAO development penalty: they do not warrant protection in order to maintain geologic stability. Subjecting development on properties with manmade steep slopes to the CAO reduces development capacity solely because of existing development the City agreed was safe and authorized in historic permits. This does not make sense and is not justified by best available science. This circumstance further adds cost to development and results in an unnecessary burden on City resources through needless permit processing to modify manmade slopes, setbacks and buffers, and ultimately delays development. This should be avoided. The FEIS should study, at minimum, modification to the CAO to remove man-made slopes from regulation.

O-28-8

Additionally, steep slope areas which are revegetated through redevelopment to become "active" outdoor spaces such as courtyards, lawns, or parks (regardless of whether they are manmade or naturally occurring) *should not count towards impervious surface calculations.* Once revegetated, these spaces no longer meet the Bellevue City Code's definition of impervious surface, and they functionally infiltrate stormwater. See BCC 24.06.040.I ("Impervious surface' means nonvegetated surface area that either prevents or retards the entry of water into



O-28

COMMENT

RESPONSE

O-28-9 See response to comment to O-28-8.

O-28-10 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-OR-H-2 on the site indicated.



O-28-9

the soil mantle as under natural conditions prior to development.”). Sites with such features should not be further penalized in impervious surface calculations, and this code change should similarly be studied in the FEIS.

These common-sense and limited revisions to the CAO will significantly ease the burden on new development from slopes while maintaining the highest level of protection for environmentally critical areas that serve environmental goals. Again, the City should identify these changes and study their impacts in the FEIS.

III. Conclusion

O-28-10

Thank you for the opportunity to comment on the DEIS. Swire commends the City for proposing action alternatives in the DEIS which address Bellevue’s housing challenges through well-managed growth while prioritizing a high quality of life and balanced job growth. But, with respect to the Site, the alternatives do not go far enough to identify an appropriate level of density and the City should identify the BR-OR-H-2 map designation for the Site in the Preferred Alternative.

Swire looks forward to engaging with the City and working with staff as the comprehensive planning process continues. As a longtime resident of Bellevue, Swire is enthusiastic about partnering with the City to achieve Bellevue’s vision for a mixed-use, transit-rich future and that with the suggested changes, the Preferred Alternative in the FEIS could achieve this vision should the company transition operations in the future. Please let us know if we can answer any questions or provide additional details on these comments.

Sincerely,

Jon Yearsley
Vice President, Manufacturing and Engineering



O-29

COMMENT

RESPONSE

O-29-1 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-L/M on the Kelsey Creek Center property. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

Kelsey Creek Center LLC
 15015 Main Street, Suite 203
 Bellevue, WA 98007

June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS Comment
 Support for Alternative 3 with Mixed-Use Midrise Densities at Kelsey Creek Center

Dear Reilly:

I am writing on behalf of Kelsey Creek Center LLC, who owns the 16.7-acre Kelsey Creek Center at the southeast corner of Main Street and 148th Avenue Southeast (Kelsey Creek Center).

As you know, Kelsey Creek Center is classified as a Neighborhood Center and serves the surrounding neighborhood with a variety of commercial and office uses. We appreciate the opportunity to comment on the City of Bellevue's Comprehensive Plan Draft Environmental Impact Statement (DEIS) for the 2044 Comprehensive Plan (2044 Comp Plan). Our comments are:

- **Preferred Alternative should be Mixed-Use Midrise for Kelsey Creek Center.**
 - All Alternatives show Kelsey Creek Center as Mixed-Use Lowrise, which would support commercial and residential uses of up to four story densities.

This is a missed opportunity. We encourage the City's Preferred Alternative for Kelsey Creek Center to be Mixed-Use Midrise, which would allow for densities of up to seven stories. Kelsey Creek Center is well served by transit. It is a destination amenity for East Bellevue for restaurants and shopping. It is adjacent to the Lake Hills Greenbelt Park and the 150-acre Kelsey Creek Community Park. We agree that Kelsey Creek Center's future is as a modernization of a mixed-use center with vibrant commercial and residential uses. **A Mixed-Use Midrise designation is most appropriate for Kelsey Creek Center to support redevelopment as a vibrant center.**

We have envisioned a conceptual plan for Kelsey Creek Center below at a midrise density with surface and above-grade parking. This could allow for approximately 1400 residential units and over 125,000 sf. of new retail and commercial uses. The Mixed-Use Midrise designation best supports the redevelopment of vibrant, modern neighborhood center for East Bellevue.

O-29-1

O-29

COMMENT

RESPONSE

O-29-2 See Common Response 19 Zoning Details.

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Page 2 of 3



The Mixed-Use Lowrise densities and application of the Transition Area standards is unlikely to support sufficient capacity and flexibility to allow viable redevelopment, particularly if a new project wished to retain a destination grocer and fitness user, among other uses. In order to support the redevelopment of the area and retain key anchor uses, **the Preferred Alternative must be a Mixed-Use Midrise for Kelsey Creek Center.**

- **Preferred Alternative should allow for range of uses in Neighborhood Centers.**

- The City's planning for uses should be less restrictive in the Neighborhood Centers, including eliminating the minimum parking requirements for residential units and relaxing parking standards for retail and restaurant uses.

The City should allow the market to decide parking standards for neighborhood centers. The Preferred Alternative should allow for above-grade parking at Kelsey Creek Center due to the existence of environmental constraints like Kelsey Creek that make below-grade parking infeasible.

- **The Preferred Alternative must evaluate – and where necessary – repeal existing concomitant zoning agreements inconsistent with the new zoning.**

The Kelsey Creek Center was originally developed in 1969 as part of the Lake Hills annexation. Since then, it has been redeveloped with a site-specific rezone and series

O-29-2

O-29

COMMENT

RESPONSE

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Page 3 of 3

O-29-3 See Common Response 19 Zoning Details.

O-29-4 Please see Common Response 4 Housing Alternatives, which describes the additional analysis related to the environmental impacts associated with detached accessory dwelling units and allowing up to four housing units per lot (or six per lot within one-quarter mile walk of a major transit stop or when two units are affordable). An Economic Analysis of Neighborhood Centers was performed outside of the EIS process. That document can be found on the City's website: <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.

O-29-3

of concomitant zoning agreements, including in 1987, 2000, 2004, 2010, and most recently, in 2013 with Ordinance 6127. These antiquated zoning agreements do not reflect the City's transit-oriented development concepts in the 2044 Plan. When implementing the new zoning with the 2044 Plan update, the City should ensure that the adopting ordinance repeals all antiquated concomitant zoning agreements and conditions that are inconsistent with the preferred Mixed-Use Midrise designation.

- **The Final EIS must include economic analysis to evaluate viability of redevelopment for neighborhood center sites in the Phase 2 LUCA.**
 - We understand that the 2044 Plan EIS analysis will help inform the Phase 2 Land Use Code Amendment (Phase 2 LUCA) considerations of increased height and density in neighborhood centers, including Kelsey Creek Center.

O-29-4

A Mixed-Use Midrise designation, allowing up to 10 stories, allows for maximum flexibility and economy in site planning and construction types.

The Final EIS should evaluate and disclose the impacts of any inclusionary zoning requirements – including on-site or fee-in-lieu affordable housing – on the viability of redevelopment to ensure that any mandates are economically balanced to provide true incentives for private participation.

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

Sincerely,

s/Brian Franklin
Kelsey Creek Center LLC

O-30

COMMENT

RESPONSE

- O-30-1 Comment noted.
- O-30-2 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-RC-H-1 on the property indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.
- O-30-3 See Common Response 4, Housing Alternatives. See Common Response 19, Zoning Details.



PO Box 3558, Federal Way, WA 98063

June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1500 124th Avenue NE*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Alco Spring District LLC ("Alco") as part of the public comment process for the City of Bellevue ("City") 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). We have reviewed the DEIS, and are impressed by the City's thoughtful approach to density changes that maximize public transit investments. This approach provides the best opportunity to move workers and residents away from single-occupant vehicle use, and is a clear way to avoid associated traffic, GHG emissions, and other impacts from density.

Alco purchased the property at 1500 124th Avenue NE in 2023 (the "Site"). The site is immediately west of The Spring District, and within 1/4 mile of the future 122nd Sound Transit light rail station. Given this proximity to transit, we agree with the direction in the DEIS action alternatives to identify the Site for additional future density. We support Alternative 3, which identifies the BR-RC-H-2 designation for the Site, and request this designation, or a similar mixed-use designation be carried forward in the Preferred Alternative. We also offer the following additional DEIS comments:

- I. **The Preferred Alternative should allow heights of 250-feet plus on parcels in Bel-Red within 1/4 mile of light rail stations to maximize future housing production.**

As noted above, we agree with the BR-RC-H-2 designation for the site identified in Alternative 3 because it would allow up to 25 stories of height. We think this is an appropriate height for future development that will provide riders for the nearby light rail line. Alternatively, we would support the BR-OR-H-2 designation that is proposed with nearly the same height limit and that

O-30-1

O-30-2

O-30-3

O-30

COMMENT

RESPONSE

O-30-4 See Common Response 19 Zoning Details.

O-30-5 See Common Response 4 Housing Alternatives for how the EIS analyzed the impact of mandatory and voluntary affordable housing programs on the production of affordable units.

O-30-6 See Common Response 19 Zoning Details.

appears to provide greater flexibility in uses. We view the Site primarily for residential future development and have commissioned a theoretical capacity study that shows how 850 large (800 sf average) residential units could be accommodated on the site. The study is attached and is incorporated herein by this reference.

O-30-4

Although we view the site primarily for residential development currently, we do not have any immediate development plans, and flexibility in future use is vital to ensure redevelopment can occur in light of unknown future market conditions. The City should not prescribe specific uses for the Site and it should provide zoning that supports building forms for a variety of uses. Instead of carrying forward the "Office/Residential" and "Residential/Commercial" designations in current zoning, in the FEIS, the City should study creating a "Bel-Red Mixed" zoning designation that would allow 250 feet of height, but not restrict specific uses.

II. Any potential affordable housing program in the Preferred Alternative should be incentive-based and account for the additional cost of high-rise construction.

O-30-5

We note that the different DEIS alternatives all appear to identify different affordable housing programs, yet the DEIS does not disclose any assumptions on affordable unit production or economic information on how such programs would be calibrated. Any affordable housing program in the Preferred Alternative should have an incentive-based structure, similar to current Bel-Red zoning. This program has yielded results in recent years, and shows promise if replicated and calibrated appropriately. Appropriate calibration is the most important part of any program, and the FEIS should disclose robust economic information detailing assumptions and demonstrating how such a program would work to encourage housing development overall while also delivering affordable units or in-lieu fees, and taking into account high-rise construction costs and current economic conditions.

III. The Preferred Alternative should study revised development standards in the densest areas of Bel-Red within 1/4 mile of light rail stations.

O-30-6

We have reviewed the development standards in the current RC zoning designation with our architects, and have significant concerns that some of the standards appear suburban and not aligned with the City's future vision outlined in the DEIS. Further, any changes to development standards beyond height are not clearly called out in the DEIS. We recommend the City study the following development standard adjustments in the Preferred Alternative, and clearly state how standards would be modified in the FEIS:

- a. **FAR to support 250 feet of height should be identified.** Current FAR limits are low. Even the densest areas of Bel-Red have a maximum FAR of 4.0. The FAR limit should increase considerably in order to support true high-rise development. The City should consider FAR limits of at least 8.0 on large sites to support tower development. The FEIS should also study removing a residential FAR limit altogether.

O-30

COMMENT

RESPONSE

O-30-7

b. 100% lot coverage and impervious surface should be allowed. Current RC zoning contains lot coverage and impervious surface limits. These standards should be removed or adjusted to 100% in the Preferred Alternative. Similar to Downtown, areas within 1/4 mile of light rail should not have these additional restrictions on density. In order to meet the City's sustainability goals, the City could study introducing sustainability standards as an incentive or a flexible green factor limit.

O-30-7 See Common Response 19 Zoning Details. Note that the City currently offers an incentive program that allows for increased FAR on projects that meet specified sustainable building standards.

O-30-8

c. Larger residential floorplates should be allowed. Current RC zoning limits upper-level residential floorplates to 9,000 square feet, which are too small to create an efficient high-rise floorplate. Our architects advise a 10,500-12,000 average upper-level floorplate is more efficient, and our capacity study assumes these larger floorplates. The Preferred Alternative should incorporate similar larger floorplate size limits.

O-30-8 See Common Response 17 BelRed Street Grid.

d. Eliminate residential parking minimums. The Preferred Alternative should shift from residential parking minimums to parking maximums, especially for sites within 1/4 mile of light rail stations.

O-30-9 See Common Response 19 Zoning Details.

e. Eliminate multifamily play area requirements. The City should replace its current multifamily play area requirement with a more typical residential amenity requirement in future zoning changes. The City should also identify parks infrastructure investments and funding sources as part of the FEIS, as it is more efficient for families with children to use a few large park amenities compared to smaller piecemeal parks that are not public. The City's focus should be on enhancing its current park resources to benefit all current and future Bellevue residents.

f. Eliminate the block length requirement. Our Site does not currently have any required local streets identified. Because of the Site's location between the light rail tracks on the north and Spring Boulevard on the south, any additional streets would be redundant and the Preferred Alternative should not study expansion of the local street grid. In addition, the City should not require the Site to be broken up based on any rigid block size or length requirement. Rigid requirements will undercut the ability for a future development to plan the Site in the most efficient manner that connects with contemporary surrounding uses.

IV. The Preferred Alternative should retain the existing framework in Bel-Red that allows historic industrial uses to continue.

O-30-9

Finally, while we are excited about development on the Site at some future date, it is currently used as a bottling plant and that use will continue for at least the next decade. Current Bel-Red zoning allows the existing manufacturing use to continue and for upgrades to occur without having to phase out on any specific timeline. We encourage the City to retain this existing use framework that is workable and fair. Development and progress occur over a long time horizon.

O-30

COMMENT

RESPONSE

O-30-10 Comment noted.

O-30-10

The DEIS has a twenty-year view, and we are certain Bel-Red will look considerably changed by then, but the City should not outlaw existing industrial uses as this could just lead to property sitting vacant and becoming a target for property crime.

Thank you for this opportunity to comment. We congratulate the City on its hard work to date. You have set out a compelling vision for the future for a City that is dense, highly amenitized, and connected by transit. We look forward to being a part of that future vision.

Sincerely,

Adam Rosen
Portfolio Manager
Alco Investment Company, Sole Member of Alco Spring District, LLC

Cc: Emil King
Thara Johnson
Abigail DeWeese, HCMP



1500 124th Ave NE, BELLEVUE, WA 98005

BelRed Expansion Vision
JUNE 2023

PREPARED FOR: ALCO INVESTMENT COMPANY
PREPARED BY: STUDIO MENG STRAZZARA

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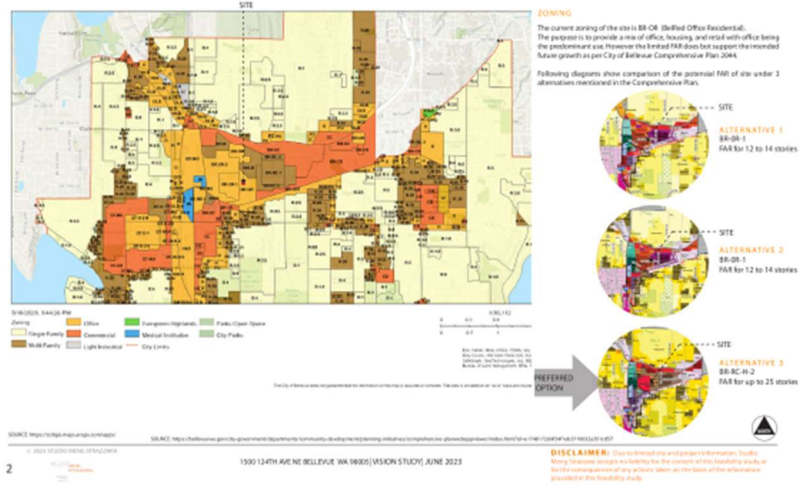


O-30

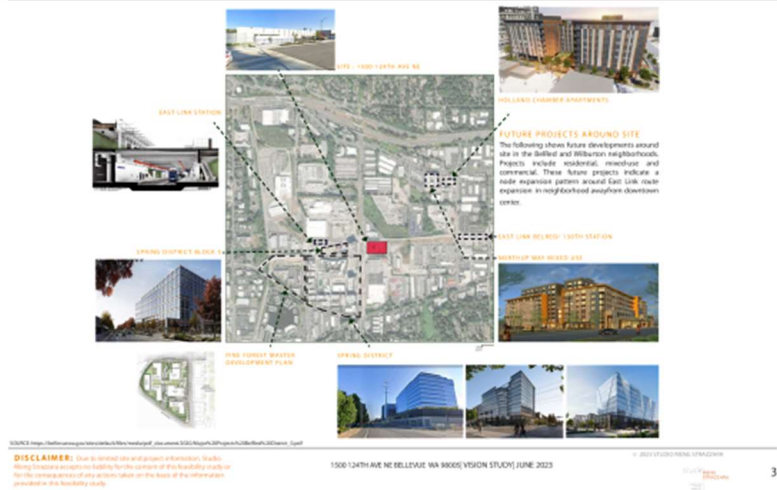
COMMENT

RESPONSE

CURRENT ZONING MAP



BLOCK STUDY - FUTURE DEVELOPMENT



O-30

COMMENT

RESPONSE

VISION, OPPORTUNITIES AND DESIGN GOALS

VISION AND DEVELOPMENT PRIORITIES

Our vision is to prepare the BelRed neighborhood for the Comprehensive Plan approved by the City of Bellevue to accommodate the growing need of jobs and housing by the year 2044. As the City aspires growth in housing, it generates the need for a variety of live, work, and play spaces.

Some of the goals outlined by the Growth Management Act (GMA) adopted by Washington State include urban growth, reducing urban sprawl, protecting the environment, economic development, and accommodating housing affordable to all economic segments.

We propose Alternative 3 as the most feasible zoning option that can be adopted under the Bellevue Comprehensive Plan 2044 as it aligns with these goals.

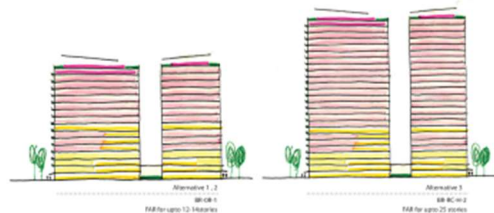
We believe up-zoning plays an important role in increasing the density of future cities. It gives the opportunity to condense residential use, work spaces in a smaller footprint while opening the potential to explore dynamic spaces for parks and recreation. Dense mixed-use development near areas of public transit ensure walkability and high influx of population into neighborhoods. Safe and walkable access to amenities in neighborhood centers also helps reduce carbon emissions.

This alternative focuses on the development of existing Neighborhood Centers and areas near public transit as well as encouraging development of new Neighborhood Centers. It aligns with our vision to create self-sustaining neighborhood within the city. New development permits local businesses to thrive. Plus encouraging innovative development.

Alternative 3 proposes an increase in housing typologies across the city, ensuring exclusionary affordability in mixed-use centers. This promotes equitable distribution of live, work and play environments within the neighborhood to meet State wide and global standards of sustainability.

DESIGN GOALS

An effective way to achieve a sustainable growth of a dense housing and mixed-use neighborhood is to create pedestrian-friendly and welcoming environments around buildings and areas of public transit. Our design focuses on creating mixed-use play spaces for ground-level activities to thrive, along with providing walkable destinations and evoking human-centric environments. The idea of density brings newer dimensions of how buildings can be designed.



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1500 124TH AVE NE BELLEVUE, WA 98005 (VISION STUDY) JUNE 2023

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SITE



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Site 0.7 miles from Wilburton study area

TRANSIT PROXIMATE AREA

Alternative 3 proposes major development in transit proximate areas which are 0.2 miles in the radius of transit network. The proximity to the transit stations will bring a major population into the BelRed neighborhood on a daily basis. Future residential and mixed-use projects developing around the site give us the opportunity to envision self-sustaining and dense residential neighborhood.



Site 0.2 miles away from 120th Station on East Link rapid transit (high capacity transit serving local development)

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O-30

COMMENT

RESPONSE

PROJECT VISION IN SITE CONTEXT



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PROJECT VISION

Tower	Floors	GSF per Floor	GSF Total
A	12	10,500	126,000
B	20	10,500	210,000
C	20	10,500	210,000
D	14	10,500	147,000
E	12	10,500	126,000

Total GSF (Residential): 840,000
 Total RSF (Residential): 800,000
 Total target units: 650 up to 800 GSF average
 GSF (Office): 50,000
 GSF (Commercial / Retail): 80,000
 Overall Total GSF: 950,000

Zoning Code Note:
 1. Building Floor Plate above 80' of 15,100 GSF
 2. Building separation at 80' of average.

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O-30

COMMENT

RESPONSE

PROJECT VISION



View 1 from 124th Ave NE and NE Spring Blvd

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PROJECT VISION



View 1 from 124th Ave NE and NE Spring Blvd

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O-30

COMMENT

RESPONSE

PROJECT VISION



View 2 from 124th Ave NE looking south

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1500 134TH AVE NE BELLEVUE, WA 98005

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10

PROJECT VISION



View 3: Streetfront plaza

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O-30

COMMENT

RESPONSE

PROJECT VISION



View 4: Deck

12

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1500-134TH AVE NE BELLEVUE, WA 98005 (VISION STUDY) JUNE 2023

DISCLAIMER: This is a conceptual rendering and does not represent a final design. It is intended to provide a general impression of the project and is not intended to be used for any other purpose. The rendering is based on the information provided in the feasibility study.

PROJECT VISION



View 5: Courtyard

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DISCLAIMER: This is a conceptual rendering and does not represent a final design. It is intended to provide a general impression of the project and is not intended to be used for any other purpose. The rendering is based on the information provided in the feasibility study.

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O-30

COMMENT

RESPONSE

PROJECT VISION IN SITE CONTEXT



View looking SW



View looking NE



View looking NW



View looking NE

14

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DISCLAIMER: Due to limited site and project information, Jacobs Perini is unable to provide a site plan for the purposes of this feasibility study. Any other information of any nature shown on this plan is for informational purposes only and is not intended to be used for any other purpose.

O-31

COMMENT

RESPONSE

O-31-1

The Preferred Alternative studied in the FEIS includes a future land use designation of O for the property indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.



June 12, 2023

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

VIA UPLOAD

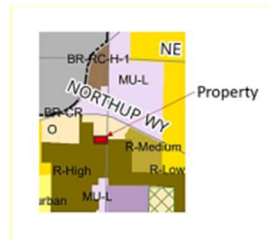
Re: Bellevue 2044 Comprehensive Plan DEIS Comment
 1811 156th Avenue NE – Crossroads Mixed-Use Center

Dear Reilly:

Thank you for the opportunity to comment on the City of Bellevue's 2044 Comprehensive Plan Draft Environmental Impact Statement (DEIS). We are writing to comment on the DEIS evaluation related to the property located at 1811 156th Avenue NE (Property). The Property is approximately 1.6 acres along 156th Avenue NE in the Crossroads Mixed Use Center. The Property is abutting residential uses to the south and west and office uses to the north.

Under all Alternatives, the Property appears to remain as an "Office" land use designation. The Property is in the Crossroads Mixed Use Center (Figure 3-9). The Property also is in or immediately adjacent to the City's defined Transit Proximate Areas (Figure 3-11).

Under Alternative 3 (shown below), the Property is an isolated node of Office designated land between areas of Residential High and Mixed-Use land use designations. This pocket of office designated area is especially isolated and small when considering that the one large Office designated parcel in this node east of 156th Avenue NE is occupied by a church.



SEATTLE
 411 1st Avenue South, Suite 650, Seattle, WA 98104 Phone: (206) 728-8500 Fax: (206) 825-9133
 Intracorp, NW, LLC

INTRACORPHOVES.COV

O-31-1

O-31

COMMENT

RESPONSE

Bellevue 2044 Comprehensive Plan DEIS Comment



O-31-2

- **The Preferred Alternative for the Property should study – and then apply – a Mixed-Use designation to provide max flexibility for potential redevelopment.**

O-31-2 Comment noted.

O-31-3

We support Alternative 3 as the best option for the City's future growth. **The Preferred Alternative should designate the Property with a Mixed-Use Lowrise or Mixed-Use Midrise designation.** The Property is within the Crossroads Mixed Use Center. It is surrounded by Residential High to the south and west and Mixed-Use designations to the north and northeast across Northrup Way. Under either of those two designations, new residential and mixed-use developments would be allowed and encouraged at heights up to six stories.

O-31-3 See Common Response 19 Zoning Details.

O-31-4

An Office designation is not anticipated to support growth or redevelopment.

O-31-4 Comment noted.

O-31-5

The Property is located on a frequent transit corridor and within proximity to multimodal transit options. The Property is at the edge of the Crossroads Mixed-Use Center and isolated from the commercial/mixed use core of the Mixed-Use Center further south along 156th Avenue. An Office designation does not provide sufficient flexibility to respond to changing conditions over the next 20 years. The Mixed-Use designation will support transit-oriented redevelopment options.

O-31-5 Comment noted.

O-31-6

- **Preferred Alternative should allow for range of uses in Mixed-Use Centers.**

The City's planning for uses should be less restrictive in the Mixed-Use Centers. Allow all uses within the Mixed-Use Center rather than being prescriptive with where to promote (or discourage) specific uses within the Mixed-Use Centers.

O-31-6 The policy S-CR-63 is part of the assumptions of the No Action Alternative. That alternative assumes that land use and policies remain as they are at the time of analysis. All other alternatives included the assumption that this policy was repealed and are compared to the No Action baseline.

- **The Preferred Alternative must evaluate – and where necessary – provide mitigation for subarea plan policies that frustrate the goals of the 2044 Plan.**

As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited. The Crossroads Subarea Plan prohibits multifamily uses at the Property, along with nearby parcels, as currently defined by Policy S-CR-63.

This is a missed opportunity for vibrant, transit-oriented redevelopment of aging low-density office buildings, including the potential for mixed-use housing types.

The DEIS fails to disclose and evaluate the impacts of Policy S-CR-63 and other restrictive Subarea Plan policies which will frustrate the implementation of the 2044 Plan's vision. The Final Environmental Impact Statement must evaluate – and where necessary – mitigate for these Subarea Plan policies that are inconsistent with the intent of the 2044 Plan by repealing such contrary policies.

O-31

COMMENT

RESPONSE

Bellevue 2044 Comprehensive Plan DEIS Comment



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

Sincerely,

Brandon Burrowes
IS Property Investments LLC

O-32

COMMENT

RESPONSE

O-32-1 Comment noted.

O-32-2 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

CH&C CAIRNCROSS&HEMPELMANN
ATTORNEYS AT LAW
524 2nd Ave., Suite 500 office 206.587.0700
Seattle, WA 98104 fax 206.587.2508
www.cairncross.com

June 12, 2023

VIA EMAIL

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

Re: Public Comment
City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and
Wilburton Vision Implementation Environmental Impact Statement (EIS)
File Number: 22-116423 LE

Dear Ms. Johnson:

We represent Aegis Senior Communities, LLC ("Aegis"), owner of land in the Lake Hills neighborhood, Tax Parcel No. 883890-0271 (the "Parcel"). The City of Bellevue has established ambitious objectives that focus on housing for its 2044 Comprehensive Plan update. We applaud the City's endeavors to upzone areas within the City that will pave the way for future growth and development in the coming decades. On behalf of Aegis, we hereby request that the City include in its 2044 Comprehensive Plan Update and in the Final EIS analysis, provisions that more directly drive market-feasible housing development in the Lake Hills neighborhood.

The Aegis Parcel is located near the intersection of 145th Pl SE and SE 16th St in the Lake Hills neighborhood. The Parcel is currently zoned Neighborhood Business ("NB"). Aegis initially acquired this land to develop an assisted living facility. Unfortunately, that development plan did not pencil out. Now, as an investment asset, Aegis seeks to sell the property for its highest and best use. The highest and best use plainly is multifamily housing, particularly given the current housing constraints and affordability crisis in Bellevue and the overall Puget Sound region. Unfortunately, under the current NB zoning, residential developers are uninterested in the Parcel. This is because the NB zoning limits new housing to only development of low-rise mixed-use buildings with retail or office on the ground floor and just one story of housing above. This product type is not economically feasible and, therefore, many areas in Bellevue that are zoned NB sit under-developed or under-developed, all while the City faces a housing crisis.

In the City's Draft EIS for the 2044 Comprehensive Plan update, all three Alternatives would rezone Aegis' Lake Hills property from NB to Mixed-Use Lowrise ("MU-L"). In general, all lands within the City's existing NB zones would be rezoned to the new MU-L zoning classification. MU-L zoning is described,

{04794599.DOCX:5 }

nngerr@cairmcoss.com
direct: (206) 254-4117

O-32-1

O-32-2

O-32

COMMENT

RESPONSE

City of Bellevue Development Services Department
 June 12, 2023
 Page 2

generally, as providing for a mix of residential and commercial use in low-rise buildings between 2 and 4 stories. However, no specific details are provided as to the uses to be allowed in the MU-L zone. For example, it is unknown if townhomes would be allowed, or if stand-alone apartment buildings will be allowed.

We ask that the strategy for the 2044 Comprehensive Plan be updated so as to provide market-feasible development potential for the Aegis Parcel, and for all land in the current Lake Hills Neighborhood Business zone. Simply carrying forward the existing uses allowed in the NB zone into the new MU-L zone will not result in new housing production on the Aegis Parcel or similarly situated lands. Even prior to the fundamental shift in retail and office uses brought on by the Covid-19 pandemic, development of low-rise mixed-use buildings with retail or office on the ground floor and just a few stories of housing above was not feasible. No one is actively building these types of structures because it is too difficult to find viable tenants for the commercial component, and the meager amount of residential development allowed above the commercial uses is not enough to ensure the project will break even or make a profit with vacant commercial space on the ground floor.

The vital need for housing in the City of Bellevue is no secret. According to the 2021 buildable lands report, the City is currently projected to achieve only 79% of its previous goal. To ensure the City remains on course to meet its future housing targets outlined in the 2044 Comprehensive Plan, it is imperative that the City adopt a preferred alternative that facilitates significantly higher residential unit growth throughout the City. We ask the City to craft the Preferred Alternative in the FEIS to assure that the specific permitted uses for the Aegis Parcel including the following: multi-family housing, including either townhomes up to three stories, or stand-alone apartment buildings with at least 5 stories, together with allowances for separate commercial structures, and that the new zoning classification allow development or re-development of projects that are 100% residential. In our view, such an allowance also makes sense when applied to all lands in the current NB Zones which the DEIS targets for rezoning to MU-L.

We commend your forward-thinking approach in acknowledging the necessity for additional housing units in Bellevue and in ensuring that the zoning code effectively directs future growth for the coming decades. We are delighted to offer our assistance to the City in any capacity possible. We appreciate your time and consideration. Thank you.

Very truly yours,

Nancy Bainbridge Rogers

NBR:alw

{04794599.DOCX;5 }

O-32-3 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-L on the property described. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations. The EIS review is not looking at the specific mix of uses on each parcel but rather the overall impact on the city of a mix of uses in a future land use designation of MU-L. See Common Response 19 Zoning Details.

O-32-4 Comment noted.

O-32-3

O-32-4

O-33

COMMENT

RESPONSE

H E A R T L A N D

June 12, 2023

City of Bellevue Planning Commission
c/o Thara Johnson

Send via email:

CompPlan2044EIS@bellevuewa.gov

Thara Johnson: TJohnson@bellevuewa.gov

Re: DEIS Comment Letter-Neighborhood Centers & Newport Hills Shopping Center

Planning Commissioners:

Heartland LLC is a Seattle based real estate advisory firm that has been engaged by Rainier Northwest, the owner of Newport Hills Shopping Center (NHSC) to help them reposition their property to be the vibrant center of the Newport Hills neighborhood for generations to come.

We appreciate the hard work that City Staff and the Planning Commission have put into the Comprehensive Plan process so far and look forward to working collaboratively to ensure that NHSC contributes to the City's ability to achieve its long-term goals. This letter provides some important background about the NHSC and offers some observations and recommendations for the City to consider as it moves forward with the FEIS and the formation of zoning and development standards.

The following summarize our findings, which are discussed in more detail in the body of the letter:

- Revitalization of the NHSC has been a stated objective of the City for decades. The current, low-density NB zoning has been cited by City commissioned studies and several private developers as one of the major obstacles to realizing the vision for a vibrant mixed-use neighborhood center. The other major impediments to redevelopment include the limited growth of new households in the surrounding neighborhood and fundamental shifts in retail over the last 40 years.
- While we support growth Alternative 3 in principle, it only just begins to address the need for more households to support retail in Newport Hills by modestly increasing housing options surrounding the NHSC. As discussed below, the proposed MU-L zoning is entirely insufficient to support mixed use redevelopment and provide desperately needed housing outside of the expensive, high-density growth centers of Wilburton and the Bel-Red. The MU-M zoning designation provides the bare minimum residential density necessary to support redevelopment of NHSC and we encourage the Planning Commission to consider it for NHSC.
- At almost 6 acres, NHSC is a unique opportunity to convert a downtrodden 1960s strip center into a true mixed-use neighborhood center. Large sites like this offer flexibility to configure buildings to incorporate public amenities that can have a profound impact on placemaking (e.g., public plazas) and are otherwise unachievable on typical sites. In addition to the densities allowed in the MU-M zoning (Base FAR), we encourage the Planning Commission to apply an incentive zoning system to MU sites in Neighborhood Centers, that are greater than 4 acres so

801 2nd Avenue, Suite 614 Seattle, Washington 98104 TEL 206 682-2500 WEB WWW.HEARTLANDLLC.COM

O-33-1 Comment noted.

O-33-2 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-L on the property described. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

O-33-3 See Common Response 4 Housing Alternatives.

O-33-1

O-33-2

O-33-3

O-33

COMMENT

RESPONSE

O-33-4 See Common Response 19 Zoning Details.

O-33-5 See Common Response 19 Zoning Details.

that the neighborhoods can benefit from the type of site-specific development standards and process employed in other parts of the city.

O-33-4

Context:

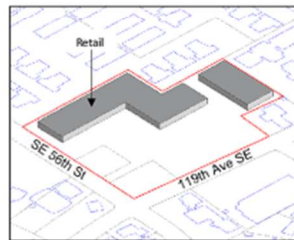
Located at the intersection of 119th Ave SE and SE 56th St, NHSC is a 5.89 acres (256,583 SF) site. Three of four buildings on the property were built in 1963 totaling to a gross building area of 55,310 SF. The vacant retail store at the northwest corner of the site was built in 1977 with a gross building area of 6,128 SF. The property is dominated by surface parking at 53% followed by buildings at 24%. The existing tree canopy is approximately 5% of the site area and almost 95% impervious surface.



O-33-5

Existing Zoning and Policy:

The site is currently zoned Neighborhood Business District (NB). NB zones are small scale, mixed-use commercial areas that provide housing opportunities, retail, and service businesses for the surrounding residential community. Though NB zoning encourages a mix of uses, the combination of a 20 feet height limit, maximum lot coverage of 35% and restrictions against locating residential uses on ground level has made redevelopment of this site infeasible. The existing shopping center makes out the current development capacity making potential for redevelopment of site unattractive.



O-33

COMMENT

RESPONSE

O-33-6 Comment noted.

O-33-7 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

In its Threshold Review of the 2018 Comprehensive Plan Amendment Application, city staff summarized the ineffectiveness of the City's land use policy on NHSC over the last two decades:

While passage of time is not a significantly changed condition, the Comprehensive Plan anticipated that Neighborhood Business would be up to the task of revitalizing this aging neighborhood commercial center. Instead, the history of revitalization attempts including land use and feasibility analyses, proposed code changes, Bill Pace's farmers market tenure, two (2) ten-year GMA updates of the general Plan, development applications, and now two comprehensive plan amendments, demonstrate the unanticipated consequence of the marginal success of NB. Lacking the intent to deliver on three promises of Subarea Plan policy, the designation has failed to bring these revitalization efforts together: 1) mixing in housing as a new ingredient; 2) sustaining local business; and 3) maintaining the "third place" role of the center in the community.

The Neighborhood Business designation and zoning on the Newport Hills Shopping Center site were established with the 1993 Newport Hills annexation and 1994 adoption of the Newport Hills Subarea Plan. The subarea has seen nine comprehensive plan amendment actions since then.

Application	Proposal	Date	Outcome
Newport Hills Subarea	Plan adoption	October 1994	Resolution 5823
West Ravine	SF-L to SF-UR and SF-H	October 1995	Ordinance 4803
Olson Coal Creek	SF-M to MF-M	December 1998	Ordinance 5118
Wittman Open Space	Open Space Taxation designation	May 1998	Withdrawn
The Oaks	Delete trail requirement	December 1998	Denied
113th Pl SE	West Ravine SF-UR to O	December 2001	Denied
Dana	SF-H to MF-L	October 2003	Denied
Lakevue Luxury Storage	West Ravine SF-UR to U	April 2004	Withdrawn
Newport Hills Village	NB to MF-M and NB	June 2016	Withdrawn
Newport Hills Shopping Center Redevelopment	NB to NMU	January 2018	Withdrawn

O-33-6

The Newport Hills Subarea Plan supports the overarching goal of a vibrant, mixed-use redevelopment at NHSC:

Redevelopment opportunities in the Newport Hills commercial district could include a mixed-use component where retail and housing are integrated. Introducing housing to this neighborhood business area may help support a greater variety of retail uses.

- POLICY S-NH-10. Support development proposals that include housing opportunities in all Neighborhood Business (NB)-zoned land in the Newport Hills commercial district.
- POLICY S-NH-25. Recognize the Newport Hills commercial district as a neighborhood center, now, and in redevelopment efforts.
- POLICY S-NH-26. Emphasize unique retail uses which enhance Newport Hills identity in a redeveloped shopping and commercial district.
- POLICY S-NH-27. Encourage new commercial and residential development and redevelopment to minimize impervious surfaces.
- POLICY S-NH-28. Ensure that all new development and redevelopment includes measures to protect and enhance surface water quality.

O-33-7

O-33

COMMENT

RESPONSE

O-33-8 Comment noted.

O-33-9 See Common Response 19 Zoning Details.

O-33-10 See Common Response 19 Zoning Details.

O-33-8

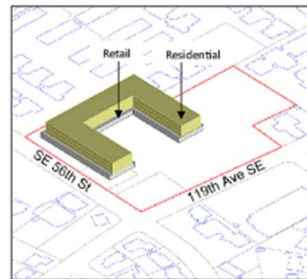
- POLICY S-NH-50. Include the following elements in a redeveloped commercial district:
 - street tree beautification plan;
 - pedestrian access from streets to shops that is separated and buffered from auto areas;
 - parking which is convenient and accessible, but which is in back or to the side of new buildings;
 - new commercial buildings at the street edge;
 - a consistent architectural identity, including facades, materials, signs, seating areas, street lighting, and Metro bus stop shelters; and
 - an outdoor information kiosk.

The 2044 Bellevue Comprehensive Plan is the opportunity to create the conditions necessary to support redevelopment at NHSC and finally achieve these policy objectives for the benefit of the residents of Newport Hills.

O-33-9

Proposed Comp Plan Designation:

The densest alternative in the Bellevue Comprehensive Plan Update DEIS proposes the single-family areas around NHSC to be designated as Residential Low (R-Low) which may, over time, result in some infill housing units. While all new housing units are helpful to support neighborhood retail, this modest allowance for incremental change cannot alone make redevelopment of NHSC feasible. The DEIS calls for NHSC to be rezoned to Mixed Use-Lowrise (MU-L), which is defined as "a mix of residential & commercial use in lowrise buildings between 2-4 stories." The housing density range in each alternative is assigned at 8 – 30 du/acre. At 30 du/acre the site yields approximately 175 units.



O-33-10

The existing buildings at NHSC are long past their usefully life so the vision for Newport Hills outlined in the comprehensive plan and subarea plan cannot be achieved without redevelopment. The MU-L zoning will not support redevelopment of the NHSC in a manner that is consistent with the objectives in the Comprehensive Plan in large part because housing drives the economics of mixed-use projects, not the retail which is, at best, a break-even component of the project. Where substantial amounts of retail space is required (and the high parking demand that comes with it) there must be sufficient residential for the project to be economically viable. Additional housing density is also needed to fund extraordinary public amenities. In the case of Newport Hills, both the retail and amenities are crucial to placemaking therefore a reasonable baseline of housing density needs to be allocated as well as a process for securing bonus density to fund the public amenities that will emerge from future site planning process.

O-33

COMMENT

RESPONSE

O-33-11 Comment noted.

O-33-11

The ownership of NHSC is committed to working collaboratively with the City and neighborhood stakeholders throughout the comprehensive planning process to formulate a land use designation and master planning process that will finally allow for redevelopment of NHSC.

Sincerely,

HEARTLAND LLC



Matt Anderson
Principal & Senior Project Director

O-34

COMMENT

RESPONSE



600 STEWART ST. SUITE 1920 - SEATTLE, WA 98101 COASTHOSPITALITY.COM

June 9, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS

Dear Mr. Pittman:

We are the operators of the Coast Hospitality property at 625 116th Avenue NE and we are writing to provide comments on the Draft Environmental Impact Statement ("DEIS") prepared by the City of Bellevue ("City") for the Bellevue 2044 Comprehensive Plan Update. Our comments are as follows:

- We support Alternative 3 to be adopted as the Preferred Alternative in the FEIS. Alternative 3 provides the most flexibility in future uses in the Wilburton subarea and is consistent with the direction provided by the City Council for future development in Wilburton. However, the maximum zoning in the core of Wilburton in Alternative 3 should be extended north to NE 8th Street on 116th Avenue. NE 8th Street is characterized by large-scale urban development throughout downtown, and the urban pattern should be no different in Wilburton immediately west of I-405. In addition, NE 8th Street is an extraordinarily wide right-of-way, so there is no need to reduce the scale of development adjacent to it (as is evidenced Downtown).
- The EIS alternatives should provide the most flexibility possible for future development of sites to follow market conditions. Therefore, all urban uses should be permitted in the core of Wilburton, including residential, office, hotel, entertainment, and research & development uses. The plan for the core of Wilburton should mimic the existing regulations for Downtown.
- NE 6th Avenue should terminate at 116th and should not be extended to 120th Avenue NE. Alternative 3A considers the possibility of this extension of NE 6th Avenue to 120th Avenue NE. The DEIS properly identifies the adverse impacts associated with this alternative.

O-34-1

O-34-2

O-34-3

O-34-1 The Preferred Alternative studied in the FEIS includes a future land use designation of OR-H-3 on the property identified, similar to Alternative 2. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

O-34-2 Comment noted.

O-34-3 Comment noted.

O-34

COMMENT

RESPONSE

June 9, 2023
Page 2 of 3

O-34-4	<ul style="list-style-type: none"> • Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to propose a street grid. In the core of Wilburton, public streets extending east or west of 116th Avenue NE make no sense, since such streets would not connect to any network. Pedestrian connections throughout the core of Wilburton should be promoted, but not vehicular connections. 	O-34-4	See Common Response 10 Wilburton Street Grid.
O-34-5	<ul style="list-style-type: none"> • Affordable housing in the core of Wilburton should be based on an incentive program, allowing additional floor area for the development of affordable housing, and not as a mandatory element. It would be important to allow such affordable housing to be developed off-site, at other locations in the Wilburton subarea. 	O-34-5	See Common Response 4 Housing Alternatives.
O-34-6	<ul style="list-style-type: none"> • The “air quality buffers” along pollution-generating arterials referred to in the DEIS should be eliminated. No such buffers exist in the Downtown on the west side of I-405, so it would be inappropriate to impose them in the core of Wilburton. Furthermore, indoor air quality in new development is easily provided based on state-of-the-art air circulation systems. 	O-34-6	See Common Response 8 Air Quality/GHG.
O-34-7	<ul style="list-style-type: none"> • The DEIS is wrong to suggest that mitigation related to “Aesthetic Impacts” could be appropriate in the core of Wilburton. The scale of development proposed in Alternative 3 on the east side of I-405 is comparable to the development currently allowed and under application on the west side of I-405 Downtown. No aesthetic impacts were identified in connection with the Downtown rezoning in 2017, so it would be improper to manufacture new impacts in the Wilburton core. 	O-34-7	See DEIS Chapter 6, <i>Aesthetics</i> , for information on potential impacts and potential mitigation measures.
O-34-8	<ul style="list-style-type: none"> • The city must study the Plan’s impact to Critical Areas and should consider amendments to the Critical Areas Ordinance (CAO). Bellevue’s CAO reflects a focus on suburban development. In order to implement the Alternative 3 plan in the DEIS (or any of the other alternatives, for that matter), the CAO must be revised to allow a more flexible approach to urban development. This is particularly the case with regard to steep slopes, which can easily be addressed in the context of urban development without risks to the environment. Conversely, the City’s failure to update the CAO to be consistent with the new Wilburton Plan will simply interfere with the implementation of the plan, and in that case the adverse impacts of the CAO should be disclosed in the DEIS. There is, after all, a reason that the Downtown area is not subject to the CAO. The approach in Wilburton should be the same. 	O-34-8	See Common Response 16 Critical Areas.
O-34-9	<ul style="list-style-type: none"> • Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. This will impact the developability of housing and affordable housing. Again, the regulations of urban development on the east side of I-405 should not be different from the Downtown. 	O-34-9	Please see Common Response 6 Noise regarding the regulatory framework for noise levels.
O-34-10	<ul style="list-style-type: none"> • The Final EIS should consider a broader range of incentives for affordable housing. This would include a revision to the City’s multifamily tax exemption program to make it more 	O-34-10	See Common Response 4 Housing Alternatives.

O-34

COMMENT

RESPONSE

O-34-11 The analysis of development agreements is outside of the scope of this EIS. See Common Response 19 Zoning Details.

June 9, 2023
Page 3 of 3

O-34-11

usable for a broader range of affordability.

- The City of Bellevue has traditionally limited the use of development agreements as an entitlement tool. This means that the city is unnecessarily limiting its ability to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton.

We appreciate the City's undertaking of Bellevue 2044 and the City's vision in planning for growth in the next 20 years. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,



Douglas Rigoni
President/CEO
Coast Hospitality LLC

O-35

COMMENT

RESPONSE

O-35-1 The parcel indicated is adjacent to Mercer Slough Nature Park with a significant portion of the site in the floodplain. The Preferred Alternative studied in the FEIS included a future land use designation of O, similar to the No Action Alternative and all three Action Alternatives. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.

O-35-2 See Common Response 18 Future Land Use Categories.

June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 DEIS Comments/Bellefield Office Park
Dear Mr. Pittman:

We are writing to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan. For reference, Talon owns and manages the Bellefield Office Park, generally located at 1450 114th Avenue SE ("property"). The buildings on the property are 1-3 story office buildings with surface parking located on the edge of Mercer Slough. The property is located approximately halfway between the South Bellevue light rail station, and the East Main light rail station. As with many office properties in the City of Bellevue, leasing has been challenging, particularly in aging office buildings. The City should look to properties like ours as potential infill and redevelopment opportunities that can help achieve a better environmental outcome for the City in the next 20 years as the City grows into a regional center.

We support Alternative 3, though it must be amended to attribute appropriate growth to the property. Alternative 3 maintains the property as "Office," which appears to allow only 1-2 stories of office without adding additional growth opportunity or flexibility of use. Given the proximity of the property to two light rail stations, and along 112nd which is a good bike/pedestrian corridor, and the likelihood that the buildings are suitable for creative infill or redevelopment in the near term, we believe more growth needs to be studied in the Office designation along 112nd. Either consider significant additional growth attributed to the Office designation, or consider this area for an MU-M designation. Please study this potential in the FEIS.

We have the following additional comments to the DEIS:

Land Use

- Uses/Designations. The potential Comprehensive Plan designations studied in the DEIS still appear to run property-by-property and would be very zone specific. Consider designating areas along major arterials like the property as "Mixed

O-35-1

O-35-2

O-35

COMMENT

RESPONSE

O-35-2

Use” areas broadly, such that any mixed use zone could implement the Comprehensive Plan designation.

- o Consider a broader mix of uses in the Office designation (residential, retail, hospital), or redesignate the property as MU-M in the Comprehensive Plan.

- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City.

O-35-3

O-35-3 The analysis of development agreements is outside of the scope of this EIS. See Common Response 19 Zoning Details.

O-35-4 This is outside the scope of analysis for this EIS. See Common Response 19 Zoning Details.

O-35-5 See Common Response 16 Critical Areas.

Transportation

- Parking requirements. Parking ratios in urban areas like the property should also be lowered. The property is between two light rail stations and currently high parking ratios limit infill or redevelopment of the property. Allow the market to decide parking ratios. Please study no minimum parking in areas like our property in the FEIS.

O-35-4

Critical Areas

- The “critical areas penalty” would currently apply to any redevelopment of the property and prevents any redevelopment of the property to something more environmentally friendly. Currently the property reflects the time in which it was built and is very auto-oriented with surface parking lots draining into Mercer Slough. It would not be possible to upgrade this system without fully redeveloping the property. Consider eliminating the critical areas penalty altogether, and consider allowing for reduction of wetland buffer, buffer averaging, and wetland mitigation banking to allow for this property to redevelop in a way that is consistent with current stormwater codes. Doing so would result in an environmental benefit on the property and would allow current property owners to right old “wrongs” of developments constructed prior to critical areas and stormwater regulations. The FEIS should consider this type of flexible regulatory environment.

O-35-5

We appreciate the City’s work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

Wende Miller
 Managing Director
 Talon Private Capital

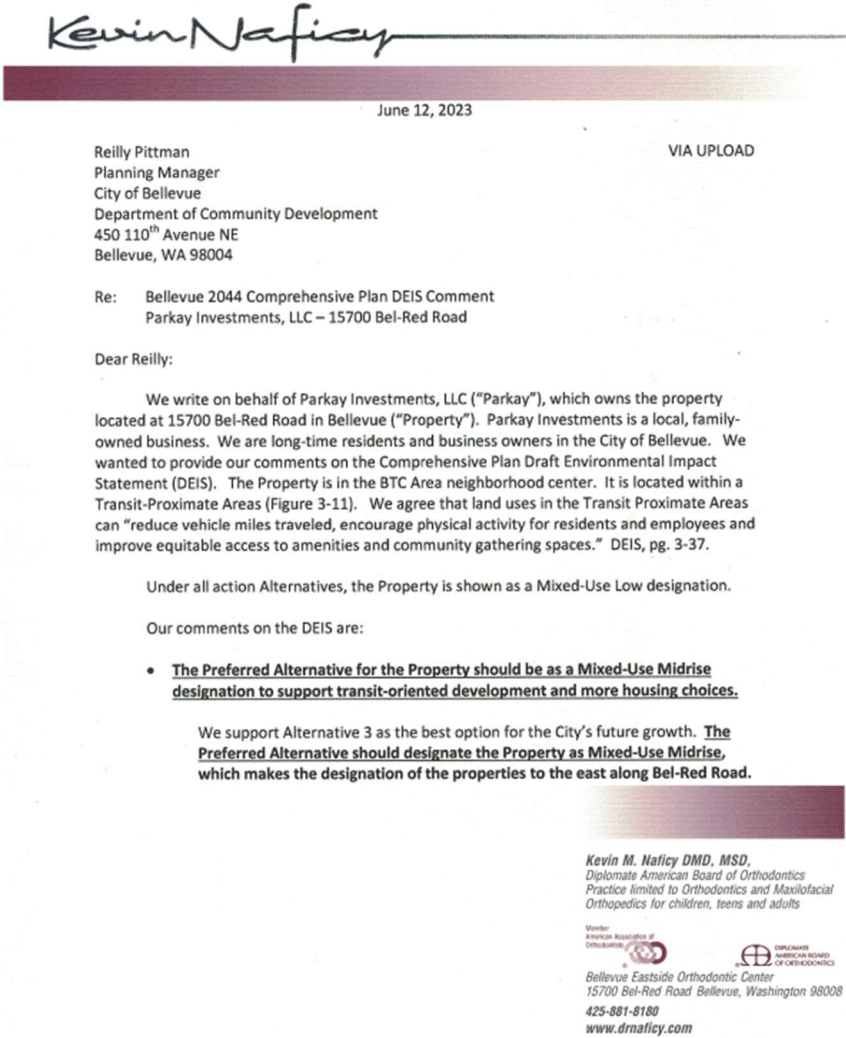
O-36

COMMENT

RESPONSE

Please see attached form.

O-36-1 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-M on the property indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.



O-36-1

O-36

COMMENT

RESPONSE

June 12, 2023
Page 2 of 2

O-36-2 Comment noted.

O-36-3 Thank you for highlighting those Neighborhood Area Plan policies. See Common Response 4 Housing Alternatives for more information on how housing was studied in the EIS.

O-36-2

The Property is located on a frequent transit corridor and within proximity to multimodal transit options, including within the walkshed of future light rail. The existing structures on the site are primed for redevelopment. A Mixed-Use Midrise designation would support a more diverse range of uses and encourage ground-floor commercial development and true transit-oriented development.

- **The Preferred Alternative must evaluate – and where necessary – provide mitigation for subarea plan policies that frustrate the goals of the 2044 Plan.**

As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited. The Northeast Bellevue Subarea Plan Policy S-NE-7 prohibits multifamily uses at the Property, along with nearby parcels in "District 1 and 2".

O-36-3

Northeast Bellevue Subarea Policy S-NE-7 is inconsistent with the Growth Management Act regulations that encourage vibrant housing options in zones that allow residential uses. The DEIS fails to disclose and evaluate the impacts of Policy S-NE-7 and other restrictive Subarea Plan policies which will frustrate the implementation of the 2044 Plan's vision and housing regulations, including HB 1220 and HB 1110. The Final Environmental Impact Statement must evaluate – and where necessary – mitigate for these Subarea Plan policies that are inconsistent with the intent of the 2044 Plan by repealing such contrary policies.

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

Sincerely,

s/Dr. Keyvan Naficy

O-37

Please see attached.

COMMENT

RESPONSE

O-37-1 See Common Response 19 Zoning Details.

O-37-2 The EIS studied general land use categories which can contain more than one zone. Studying site-specific zoning requests is outside of the scope of this FEIS.

June 12, 2023

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

Via email CompPlan2044FEIS@bellevuewa.gov

Re: *SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement, File Number: 22-116423 LE for EGBW38R Owner LLC*

Dear Director Stead and Mr. Pittman,

On behalf of EGBW38R Owner LLC, we submit the following SEPA comments on the City of Bellevue ("City") Draft 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). We are deeply appreciative of the hard work of city staff that is reflected in the DEIS, and we are excited about the bold future for Bellevue envisioned in the document. This comment letter builds upon the initial written testimony we provided during the scoping process last fall. In these SEPA comments, we now ask the City to clarify our property should be zoned Office and Limited Business District 2 ("OLB2") within the Office Limited Business ("OLB") land use map designation in the Final Environmental Impact Statement ("FEIS") Preferred Alternative due to its large size and central location. Additionally, we respectfully request that the City consider additional density and height in the OLB2 designation to allow midrise residential use up to 85 feet or greater. Both SEPA comments are further explained below.

As you know, EGBW38R Owner LLC acquired the former Boeing Computer Office Campus in Eastgate located at 2525-2810 160th Avenue SE (the "Site") in 2021. Since then, we have taken several initial steps to reposition the Site for more modern office use. We have submitted permit applications for a new parking garage to make progress on existing parking deficits, and we have tenant and landscape improvement work planned. We have not solidified our long-term plans for the Site beyond these preliminary permit submittals in hopes that the changes reflected in the FEIS and implemented in the Comprehensive Plan update and Land Use Code Amendments allow for greater flexibility and appropriate development potential.

1. The FEIS Preferred Alternative should designate the Site as OLB2.

Given its large size and campus setting, the Site presents an incredible opportunity for measured growth, but it is near its development capacity limit under current zoning. In all three Action Alternatives proposed in the DEIS, the future land use designation for the Site is OLB, which can support OLB, OLB2, and OLB-OS zoning. The Site is currently zoned OLB, which is less dense than OLB2. More specifically, the OLB2 District "has greater intensity and a larger mix of

O-37-1

O-37-2

O-37

COMMENT

RESPONSE

O-37-3 Comment noted. See Common Response 19 Zoning Details.

O-37-4 Comment noted. See Common Responses 19 Zoning Details.

O-37-3

uses than the OLB District.” Bellevue Land Use Code 20.10.285. Additional density provided through the OLB2 designation is particularly appropriate here because: (1) the Site is currently buffered from nearby residential areas by a significant landscape buffer that is protected by covenants and functionally cannot be removed, (2) access and circulation is provided to the south through office developments and higher-density zones, not residential uses, and (3) the Site includes significant underutilized land area in surface parking. Therefore, in order to provide future flexibility for redevelopment, we request the City identify a rezone of the site to OLB2 the FEIS Preferred Alternative. As drafted in the DEIS, it is impossible to determine whether the OLB2 zone is contemplated for the Site since the OLB future land use designation is all that is reflected in the DEIS. Additional zoning clarity in the FEIS is necessary to fully understand the City’s plans for density and future growth.

2. The City should consider additional density and height in the OLB2 zone.

O-37-4

In order to realize the full development potential of the Site, we ask that additional density and height, specifically up to 85 feet or greater for midrise residential use and supporting FAR (or unlimited residential FAR), be considered for the OLB2 designation. This modest 10-foot increase in height (current OLB2 height is 75 feet) can provide the flexibility needed to provide appropriate siting, bulk, and design of potential future buildings on the Site. Additional height would allow even greater flexibility. The bold future envisioned for Bellevue in the DEIS requires corresponding development standards that make the implementation of the vision possible and heights should correspond to efficient building forms. Eighty-five feet, the height limit for Type IIIA construction in the IBC, is commonly accepted as one of the most efficient building forms, and the City’s zoning should at least align with this building typology.

Thank you again for this opportunity to comment on the DEIS. We look forward to continuing to engage with you in the next steps of the City’s planning process. If you have any questions, please do not hesitate to contact us.

Sincerely,

Diego Rico, Vice President for EGBW3BR Owner LLC

cc: Thara Johnson, Comprehensive Planning Manager, tmjohnson@bellevuewa.gov
 Emil King, Planning Director, eking@bellevuewa.gov
 Abigail DeWeese, HCMP, abigail.deweese@hcmp.com

O-38

COMMENT

RESPONSE

- O-38-1 Comment noted.
- O-38-2 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-RC-H-2 for the properties indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.
- O-38-3 Comment noted.
- O-38-4 See Common Response 5 Assumption of Buildout and Common Response 19,Zoning Details.
- O-38-5 See Response O-38-4.

June 7, 2023

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

Re: Bellevue 2044 DEIS comment letter

Dear Reilly:

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

- Alternatives/Uses/Urban Form
- We Support Alternative 3, with the following items that should be studied:
 - The Property is designated as BR-RC-H-2, which is "Bel-Red Residential/Commercial Highrise-2; Residential highrise towers including ground floor active uses up to around 25 stories." While we appreciate the height and apparent density being contemplated for this area, we also believe that a variety of uses should be studied. It is true that today the office market would not support new development, but that might not be the case in the 20-year horizon. Consider allowing more flexible uses in all of the Bel-Red zones generally. Please study this in the FEIS.
 - We do not believe the Alternatives 1 and 2 that designate the property as BR-RC-1 (Mostly housing, with limited office, retail, and services in buildings between 2-14 stories) is adequate density within ¼ of a light rail station. We do not support Alternatives 1 or 2.
 - Consider a broader "Bel-Red" comprehensive plan designation that allows many zones to implement the plan. Please study this in the FEIS.
 - Please disclose the FARs utilized to achieve the density model used by the DEIS. A minimum of a 6 FAR should be allowed within ¼ mile of a light rail station. We encourage the City to "go big" on FAR as this is a 20-year plan.
 - As the City is considering the Bel-Red code and the various mitigating measures under aesthetics, revise floor plate restrictions to 28,000 below 85', and 13,500 above 85'. Attached is a buildout scenario for our property. As you can see, larger floor plates still result in appropriate light and air and a developable

O-38-1

O-38-2

O-38-3

O-38-4

O-38-5

O-38

COMMENT

RESPONSE

O-38-6 See Response to O-38-4. See Common Response 4 Housing Alternatives for information about how housing was analyzed in the EIS.

scenario. Under current zoning, upper level setbacks and floor plate limitations have created an unbuildable situation.

- Eliminate lot coverage and impervious surface limitations. This is an urban area and should be treated as such. The result is appropriate urban development next to light rail.
- Reduce setbacks and eliminate upper level setbacks. Again, this is an urban area. Design review can provide for modulation and articulation of larger building facades.
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope.
- Exempt below-grade areas from FAR. This will maximize positive urban development above-grade.
- Allow FAR to be freely allocated within a master-planned site, without requiring upgrades to remaining nonconforming conditions. In an evolving urban environment, retained uses and structures will likely redevelop in the near term. Allowing continued economic use of such structures without the need for major capital re-investment will promote the immediate redevelopment of other portions of the master-planned site.
- Maximum residential heights in TOD areas should not be less than 250 feet, in order to support viable high-rise development as well as low-rise (5-8 story) development. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 250 feet. Below 250 feet, high-rise development is difficult to underwrite in these urban centers. We appreciate the City's inclusion of 25 stories on our property and believe it is appropriate height and density.
 - We understand the City's focus on affordable housing in all areas of the City. We note that properly-calibrated incentive zoning, combined with the ability to utilize MFTE, has resulted in affordable housing being provided in other cities in the region, and is beginning to produce more market-created affordable units in Bellevue. We encourage the City to review these policies and calibrations to determine an appropriate outcome in Bellevue. High rise development should not be written off as "not affordable," because with the correct policies, it can create on-site affordable housing units, and/or fees-in-lieu for lower levels of affordability that would not be constructed on-site.
- Appropriately-scaled upper-level connections between buildings should be allowed and should be exempt from maximum floorplate limitations. Above-grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more directly. The code should promote these kind of connections.
- Tower spacing should be limited to 40 feet, as in the Downtown.
- Allow a wide range of uses consistent with urban center and TOD locations; avoid the restriction of uses within the available development envelope, which only reduces development capacity and flexible future proofing of buildings.

O-38-6

O-38

COMMENT

RESPONSE

O-38-17	<ul style="list-style-type: none"> ○ Provide flexibility to allow nonconforming uses and structures to continue and maintain necessary investment. Such sites will redevelop over time, but prior to redevelopment they can provide useful services in the urban environment. ○ Avoid being prescriptive about timing, sequencing and scale of different uses; allow the market to dictate development over time. In the past, the city has at times restricted the development of certain uses, in an effort to force the market. The city would be better positioned to allow all uses, but incentivize those that are preferred. ○ Allow interim, low-intensity uses in master-planned sites, such as parking and low-intensity commercial uses, so that sites may remain financially productive as development is being phased in. Allowing such interim uses will help to support the sooner urban development of other portions of master-planned sites. The future code should endorse such measures to promote near-term development in accordance with the new plan. 	O-38-7 See Common Response 2 Tree Canopy. See Common Response 16 Critical Areas.
		O-38-8 See Common Response 17 BelRed Street Grid.
O-38-7	<ul style="list-style-type: none"> • <u>Critical Areas/Trees</u> <ul style="list-style-type: none"> ○ The DEIS does not adequately study the impact of the Critical Areas Ordinance on the density portrayed in the different alternatives. For example, the "critical area penalty" does not appear to have an impact on any of the density presumed in the DEIS. Critical areas should be mapped and the penalty should be applied, and the results should be disclosed to the public and decisionmakers. Please include this specific analysis in the DEIS. ○ The DEIS should also study an alternative that includes no critical area penalty in any urban center, including Bel-Red, and disclose the impacts to density when the critical areas penalty is removed. ○ The DEIS should study the impact of the steep slope critical area and buffers on the density portrayed in the different alternatives. Many sites are shown as including towers when towers may not be able to be built due to the presence of a man-made steep slope. Decisionmakers should be made aware of the impacts of the application of the critical areas ordinance to man made steep slopes so that they can make decisions accordingly. Please include this study, as well as an alternative that specifically removes manmade steep slopes from the critical areas ordinance, in the FEIS. ○ A revised tree ordinance is being contemplated by the City. Bel-Red should be exempted from tree regulations, as in downtown. Requiring a reasonable tree replacement / tree planting ratio may lead to an expansion of the urban tree canopy rather than pitting trees against urban development across from light rail. Consider also a fee-in-lieu system that will assist the City in planting right-of-way trees and park trees when trees cannot fit in a right-of-way or on a project site (see Seattle's recent tree ordinance). 	O-38-16 Specific analysis of environmental impacts associated with amendments or revisions to the city's development regulations in Land Use Code and Transportation Code that regulate tree removal and replacement in the city is outside of the scope of this EIS.
O-38-16		O-38-17 Analysis of city regulation of nonconforming uses is outside of the scope of the EIS.
O-38-8	<ul style="list-style-type: none"> • <u>Bel-Red Grid System</u> <ul style="list-style-type: none"> ○ The DEIS transportation analysis should look at whether the currently-required Bel-Red road grid system is needed to reduce traffic congestion in Bel-Red. Please run the transportation model with either no grid system or a significantly reduced grid system. The Bel-Red grid system currently bisects properties in an 	

O-38

COMMENT

RESPONSE

O-38-8

inefficient manner that has hampered property developers' ability to construct the network, and the City has not participated in most of the grid buildout. Please also run a model that includes pedestrian and bicycle connectivity rather than car connectivity in areas of the grid system.

O-38-9 Comment noted.

O-38-10 A Determination of Significance was issued on September 29, 2022, for this project therefore the scope and format of the EIS is guided by the laws in place at that time.

O-38-9

- Transportation Mitigation/Approach
 - We applaud the City's proposed transportation mitigation measures stated in M-TR-1 through M-TR-4. The City rightfully cites the land use/transportation connection as the best way to mitigate transportation impacts. Specifically, the City states that Alternative 3 has "inherent transportation benefits compared to the No Action Alternative." We agree; in a dense urban environment, focusing on TDM strategies, encouraging transit use, and building out pedestrian and bicycle networks are the best way to move more people more efficiently. Creating a more walkable and bikeable area (not driveable area) also adds vibrancy to a neighborhood and supports ground level uses and neighborhood businesses, and supports light rail use.
 - We note that the transportation model presumes 100% density build-out; this is an extremely conservative model as 100% density build-out is almost impossible in the 20-year horizon. We appreciate the City utilizing a conservative model to ensure that all impacts are properly studied.

O-38-11 See Common Response 4 Housing Alternatives.

O-38-10

- Parking
 - Parking is no longer an "element of the environment" under SEPA as of January 2023. We strongly recommend eliminating minimum parking standards. The market should decide parking requirements; it is very effective at determining parking need and demand.
 - Eliminate parking requirements for street-level retail and restaurant spaces. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses. Ample street parking should be available to support street-level retail and restaurant spaces; on-street parking adds to vibrant street life and calms traffic by potentially narrowing roads.
 - Eliminate parking requirements for changes of use. This allows uses to be reused more easily should they become vacant.
 - On-site loading standards should be made more flexible. In urban environments, loading can be accomplished with a variety of vehicles and times of day and does not need to occur entirely within a structure. Code requirements should reflect this. The FEIS should analyze these parking issues in a similar way to the discussion in the transportation section.

O-38-11

- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options, avoid mandatory inclusionary requirements. Alternative 3 should be studied with an affordable housing goal in mind, and an economic analysis should be completed that shows how an incentive system can create the highest number of market rate and affordable housing requirements.

O-38

COMMENT

RESPONSE

O-38-12

- Avoid utilizing market-rate developers as the only “solution” for creating affordable housing. The City is an important partner in the affordable housing discussion. The EIS assists decision makers in making future zoning decisions. Please discuss and study in the FEIS the wide variety of tools in the affordable toolkit that the City could deploy to address housing affordability. These tools could include a housing levy, housing vouchers, and other funding sources to help build affordable housing.

O-38-12 See Response to O-38-11.

O-38-13

- Aesthetics:
 - In urban centers, transition zones should not be utilized. In a City, it is expected that buildings will be large.
 - If viewpoints/views are protected as a mitigation measure, they should be very closely defined. Private views are not protected under SEPA and protection of public views is limited.

O-38-13 This document is a non-project EIS that analyzes the growth alternatives, potential environmental impacts, and identifies potential mitigation for disclosed impacts broadly across the study area. See Common Response 19 Zoning Details.

O-38-14 See Common Response 8 Air Quality/GHG.

O-38-14

- Air quality:
 - The air quality discussion appears to be an “environmental health” discussion rather than an air quality discussion. Ironically, if “air quality buffers” are incorporated around freeways and major arterials, more growth will be pushed farther away from transportation systems, and more auto-oriented emissions will occur. We do not support an “air quality buffer” and believe the impacts of the mitigation on density should be adequately studied in the FEIS such that decision makers can make an informed decision.

O-38-15 See Common Response 22 Mitigation Measures Required.

O-38-15

- General: The FEIS should include a guide for decision makers related to their policy choices. When an FEIS is completed, SEPS does not require decisionmakers to mitigate impacts below a level of significance. Rather, mitigation is at the option of the decisionmakers. Currently, the DEIS infers that mitigation is “necessary” when it actually is optional. Please include additional information regarding this process for the public and decision makers.

We appreciate the opportunity to make comments, and we look forward to working with you through the Comprehensive Plan process.

Sincerely,

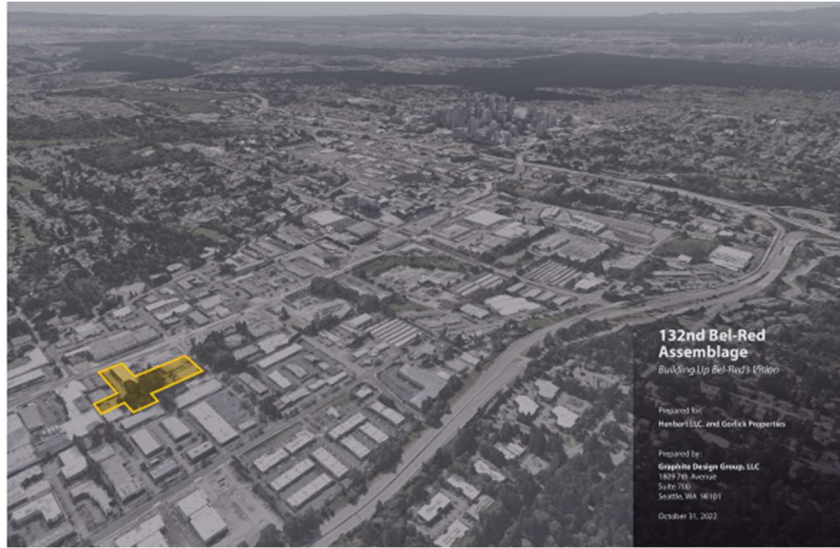
Mark Craig

President, Henbart, LLC

O-38

COMMENT

RESPONSE



Project Goal and Development Priorities

Goal

To ensure site development within the Bel-Red area will meet Bellevue's long term housing needs and anticipated job growth. This document shows what the current code allows on the project sites, and a vision for more dense development to the help achieve the goal statement.

Development Priorities

- 1. **Increased Development Density**
Increase development density throughout the Bel-Red sub-area, further progressing toward Bellevue's Growth Targets.
- 2. **Leverage Proximity of 132nd Link Station**
Increase development adjacent to Link Station, promoting mass transit use and reducing single occupant vehicles.
- 3. **Increase Flexibility in BelRed Zoning**
Allow projects to propose sensible zoning modifications in response to varying site constraints.



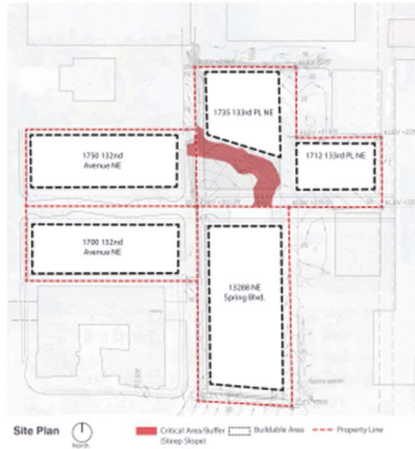
132nd Bel-Red Assemblage | 1300132nd | Avenue NE | October 31, 2022

O-38

COMMENT

RESPONSE

Site Plan With Critical Areas

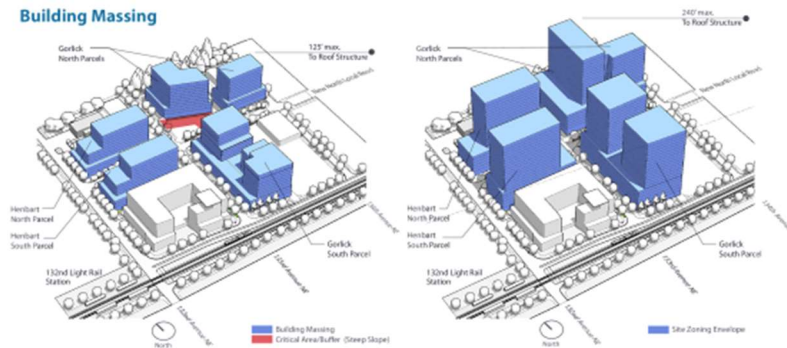


Critical Areas:

- Exempt Bel Red from the Critical Areas Ordinance, similar to Downtown
- Where the Critical Areas Ordinance applies in urban centers and TOD areas:
 - Eliminate the critical area density penalty entirely. In a dense urban environment, the density penalty does nothing to protect critical areas - it only reduces the long term opportunity for TOD. Critical areas can be well-protected without reductions in on-site density.
 - Provide for an exemption from (steep slope) critical areas, in cases where new development will provide properly engineered construction to maintain the stability of the slope. Seattle has employed this exemption to good effect for many years. Preservation of natural slope areas in a dense urban environment only creates orphaned, unusable land that could be put to better urban uses.

1 132nd Bel Red Assembly | 1700 132nd Avenue NE, October 31, 2022

Building Massing



Current Zoning

Zone: BR/RC-2
 FAR Max: 4
 Building Height: 45' base, 125' max.
 Front Setbacks: 15' at 40' height
 Side and Rear Setbacks: 25' at 40' height
 GSF above 40': 28,000 GSF Commercial
 GSF above 80': 12,000 GSF Residential
 28,000 GSF Commercial
 9,000 GSF Residential
 Lot Coverage Max: 75%

Current Zoning Data

Combined Total Area: 202,912 GSF (All 4 Parcels)
 Total Residential Area: 629,670 GSF
 Approx. Total Residential Units: 744 units (at 850 SF/Unit)

Proposed Zoning

FAR Max: 4
 Building Height: 85' base, 240' max.
 Front Setbacks: 10' at 85' height
 Side and Rear Setbacks: 10' at 85' height
 GSF up to 85': 28,000+ GSF Commercial
 28,000+ GSF Residential
 28,000 GSF Commercial
 13,500 GSF Residential
 Lot Coverage Max: 100%

Proposed Zoning Data

Combined Total Area: 202,912 GSF (All 4 Parcels)
 Total Residential Area: 1,572,320 GSF
 Approx. Total Residential Units: 1,935 units (at 800 SF/Unit)

4 132nd Bel Red Assembly | 1700 132nd Avenue NE, October 31, 2022

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COMMENT

RESPONSE

Development Challenges and Opportunities

Challenges and Requests:

Zoned **BB-RC-2** (Bel-Rail Residential/Commercial/Node-2) the project property's multi parcel development capacity is currently underutilized given the projected job growth for The City of Bellevue and the Puget Sound Region as a whole. Increasing the project's development potential supports Bellevue in achieving their growth targets.

1. Zoning Standards - FAR, height limits, and development standards must be calibrated to achieve appropriate density.

Density - Request the City of Bellevue to consider the following density approaches:

- Maximize heights and densities within ½ mile of light rail stations
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope
- Exempt residential uses from FAR. This is the single most effective way to promote residential development in new development regulations.
- Exempt below grade areas from FAR. This will maximize positive urban development above grade.

Floor Plate Sizes and Tower Standards

- Maintain appropriately sized residential floor plates above 85 feet, while permitting residential floor plates larger than 28,000-sf below 85 feet. The objective should be to maximize housing development opportunities, which means larger floor plates below 85 feet and smaller ones in towers above.
- Appropriately scaled upper level connections between buildings should be allowed and should be exempt from maximum floor plate limitations. Above grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more closely. The code should promote these kind of connections.
- **Incentive Amenity System** should allow development to achieve maximum density and heights above a base with flexible amenity options like affordable housing, flexible open space, and sustainability measures. The incentive system should allow fees-in-lieu in addition to on-site and off-site performance options for all amenities.
- **Critical Slope Areas** - Allow flexible solutions like building structure to help mitigate slope impact and remove additional buffer requirements currently required within the zoning code.

2. Flexible Development Envelope - Reduce and/or remove some of the current Zoning Envelope Requirements

- **Podium Height** - Allow podiums to have flexible programs and increased height, maximizing development at lower levels.
- **Tower Spacing** - Determine reasonable tower separation standards. Tower spacing should be variable on multiple tower sites. Also consider towers to be connected at upper levels so as to share usable spaces, that just corridor.

- **Upper level setbacks** - Do not implement arbitrary upper level podium setbacks that require a "wedding cake" design.
 - **Ground level setbacks** - Consider flexibility in required ground level setbacks beyond development B.O.B.s.
 - **Site Coverage and Impervious Surface Req's** - Urban centers and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID and hard surface coverage regulations, similar to Downtown.
- 3. Parking Density** - Establish maximum parking standards. The market should decide parking requirements, it is very effective at determining parking need and demand.

Opportunities:

The Project's vision supports Bellevue's current and future development goals. As a flexible, multi-use, urban in-fill development it achieves economies of scale, creates a synergistic neighborhood, and reduces the need to consume natural resources.

- 1. Multi-Parcel Neighborhood**
The combined site adjacent newly created streets, creating a 4 corner neighborhood with residential lobes and retail adjacent the pedestrian walkway creating engaging and synergistic connections between the 4 development sites.
- 2. Mass Transit Proximity**
The site are well positioned to fully utilize mass transportation networks given proximity to the Link Rail Station.
- 3. Dwelling Unit Demand**
Potential delivery of more than 3,000 housing units to help meet the City's demand for housing and growth targets. In order to achieve this, belt-and-panning will need to be flexible rather than prescriptive in development standards and uses.
- 4. Sustainability**
Environmental sustainability through high density residential development near jobs reduces impacts on public infrastructure and sprawl.
Higher density development lessens consumption of undeveloped land and reduced carbon emissions and fossil fuel consumption by residents.
New buildings provide opportunities for sustainable construction and technology like Mass Timber. In addition, ground-level landscaping and "woonerf" strategies create a unique, safe, and engaging ground level experience furthering the City's vision to be a "City in a Park".

1 | 132nd and Redmond Avenue/Maple | 1700 | 12th | Avenue NE | October 31, 2022

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COMMENT

RESPONSE

Please see attached.



June 12, 2023

Draft Environmental Impact Statement Comments
City of Bellevue Development Services Department
Attn: Liz Stead, Director and SEPA Responsible Official
Reilly Pittman, Environmental Planning Manager
Bellevue City Hall
450 110th Avenue NE
Bellevue, WA 98004

Via email to CompPlan2044EIS@bellevuewa.gov

Re: SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement, File Number: 22-116423 LE for Alexandria Center for Science and Technology – Bellevue

Dear Director Stead and Mr. Pittman:

On behalf of Alexandria Real Estate Equities, Inc. ("Alexandria"), we submit the following SEPA comments on the City of Bellevue ("City") Draft 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). As a major stakeholder in Bellevue, Alexandria was pleased to see the City's strategic vision for growth in the DEIS and we are optimistic for a bright future for Bellevue.

We have a successful track record of creating life sciences "clusters" that house some of the world's most important companies doing cutting-edge research to benefit all of humanity. We are excited to bring this model to Bellevue with our proposal for the Alexandria Center for Science and Technology—Bellevue ("ACST-Bellevue") in Bel-Red. We are seeking the City's partnership to make this potential development a success, and have identified in this letter Comprehensive Plan and future zoning topics that should be addressed in the FEIS Preferred Alternative to advance this effort.

I. Background

Alexandria is the leading owner, operator, and developer of collaborative campuses for life science, agtech, and technology companies in the nation's top innovation centers. The

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400 Dexter Avenue North, Suite 200 | Seattle, CA 98109
TEL 206.408.1550 | FAX 206.325.6348 | www.are.com

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O-39-1 Comment noted.

O-39-2 Comment noted.



trusted partner to over 850 tenants, Alexandria has a total market capitalization of \$33.0 billion and an asset base in North America of 75.6 million SF as of March 31, 2023, which includes 41.9 million RSF of operating properties and 33.7 million RSF of Class A properties undergoing construction, redevelopment or in design and entitlement for future development. Alexandria has a longstanding and proven track record of developing Class A properties clustered in life science, agtech and advanced technology campuses that provide our innovative tenants with highly dynamic and collaborative environments that enhance their ability to successfully recruit and retain world-class talent and inspire productivity, efficiency, creativity and success

The company is guided by its mission “[t]o create and grow life science ecosystems and clusters that ignite and accelerate the world’s leading innovators in their noble pursuit to advance human health by curing disease and improving nutrition.” Over almost three decades, Alexandria has created thoughtful cluster developments throughout the country, including in the Puget Sound Region working alongside the Fred Hutchinson Cancer Research Center, University of Washington Medicine, and the Bill & Melinda Gates Foundation.

The City of Bellevue has experienced significant growth over the past few years, but we continue to see an opportunity for Bellevue to diversify its jobs base with life sciences uses that are currently concentrated in elsewhere in this region like South Lake Union and Bothell. Science requires sophisticated facilities, and sensitive lab work cannot be done at home. This use is a valuable model that will bring in-office workers back to Bellevue and is a strong economic development driver.

Alexandria is deeply interested in the Action Alternatives contemplated in the DEIS as the owner of the property located at 1239 120th Avenue NE (the “Site”) where we plan to build ACST-Bellevue. The Site’s proximity to future Sound Transit Link light rail and The Spring District activity center, presents an exciting transit-oriented development opportunity to establish a new life science cluster connected regionally by light rail. We have advanced entitlements to support this effort, including an update to the existing Master Development Plan for 750,000 square feet of sophisticated lab space and extraordinary amenities, but we have also identified code issues that must be fixed in order to deliver the highest quality product for our future tenants. Our vision for this development is the first phase to ignite a true life sciences cluster in Bel-Red and that requires a thoughtful approach. We encourage you to consider our comments below so that the Preferred Alternative can be optimized this opportunity.

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O-39-1

O-39-2

O-39

COMMENT

RESPONSE



II. The proposed BR-OR-H-2 designation for the Site and Alternative 3 components should be advanced in the Preferred Alternative.

We have carefully reviewed the Action Alternatives presented in the DEIS. Alexandria supports the BR-OR-H-2 designation for the Site identified in Action Alternative 3 as it includes the highest combined amount of future capacity among the three Action Alternatives. DEIS at 2-27. More broadly, we support Action Alternative 3 because it correctly focuses on growth in Mixed Use Centers and in areas of high opportunity with good access to transit and jobs or near Neighborhood Centers. DEIS at 2-26. We are encouraged that Action Alternative 3 would have capacity for an additional 95,000 housing units, 200,000 jobs, and 67.3 million square feet of commercial development. DEIS 2-27. Contemplation of large figures such as these is necessary if Bellevue is to appropriately develop over the next 20 years and diversify its industries. Action Alternative 3 best recognizes the positive growth that the City is experiencing and will continue to experience in the years ahead.

Alternative 3 also identifies specific future land use map designations relevant to life science users. Adjacent to the Site, the identified BR-MO-H-1 and BR-MO-H-2 designations suggest future zoning that will support life sciences to form a cluster catalyzed by our development. We support zoning under the BR-OR and BR-MO designations that clearly call out research laboratory and science-based functions as allowed and preferred uses and the FEIS should identify these use types specifically in the Preferred Alternative.

III. The Preferred Alternative must incorporate study of development standards to support life science tenants.

Additional analysis is needed in the FEIS to identify changes to development standards necessary to create an optimal built environment for life science users. Our tenants are not typical office users: they require higher floor-to-floor heights to accommodate dense mechanical space, specific structural systems to minimize vibration, and larger floorplates and special HVAC systems to support experiments. We have attached a study provided by our mechanical consultant detailing some of these unique needs further; please consider it incorporated into these comments by reference. [Exhibit 1](#), GLUMAC Memorandum. The DEIS does not recognize these unique features, and they should be addressed in the FEIS to ensure future zoning can achieve the City's goals. We specifically recommend:

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- O-39-3 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-OR-H-2, which is similar to Alternative 3. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.
- O-39-4 See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

O-39-3

O-39-4

O-39

COMMENT

RESPONSE



O-39-5 See Common Response 19 Zoning Details.

O-39-6 The analysis of tax credits is outside the scope of the EIS.

O-39-7 Comment noted.

O-39-5

- Increased height in the BR-OR-H-3 designation up to 350'+ to allow 16'+ floor-to-floor heights with the number of stories identified;
- At least 30 feet of additional height to accommodate typical life science mechanical equipment, and unrestricted additional height to accommodate mechanical equipment meeting sustainability goals like natural ventilation systems;
- Removing property line setbacks inappropriate to an urban environment and relying on building code fire separation requirements; and
- Maintaining at least the current 28,000 sf floorplate limit up to the new heights envisioned, and consider expanding floorplate sizes to 50,000 sf below 180'.

Given the unique nature of life science land uses and the infrastructure they require to operate, the FEIS must study these features to ensure a feasible future for life sciences development in Bellevue.

IV. The Preferred Alternative should study creative economic development incentives for life science tenants to compete nationally.

Life sciences in Bellevue is untested. We think there are strong reasons for companies to want to locate in the City, but nationally and internationally, many jurisdictions recognize the value of these companies as economic development engines and are competing aggressively to attract them. Massachusetts, for example, provides significant tax credits ranging from \$15,000-25,000 for each job created. San Diego similarly provides a tax rebate of 45 percent of the local sales tax paid in connection with local operations. The DEIS does not identify any similar economic development measures in Bellevue. The City should challenge itself to think creatively and include discussion of such measures in the future Comprehensive Plan and the FEIS so that Bellevue can foster the programs it needs to attract the world's top biotech companies.

O-39-6

I. Conclusion

Thank you for the opportunity to comment on the DEIS. We look forward to continued engagement in the comprehensive planning process, and support advancing Alternative 3 as the Preferred Alternative with a BR-OR-H-2 designation for the site and with the

O-39-7

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RESPONSE



ALEXANDRIA.

modifications and incentives to further support life science use. We remain excited about partnering with the City on ACST-B and look forward to further conversations on how the City can best compete nationally for the top life sciences companies. If you have any questions, please do not hesitate to contact us.

Sincerely,

Christian Gunter
Senior Vice President – Development

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

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COMMENT

RESPONSE

From: Erin Powell <u2mngpio@icloud.com>
Sent on: Monday, June 12, 2023 8:23:44 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>
CC: board@bridletrailscommunity.org; pamjjo@msn.com
Subject: Comments from Erin Powell and Bellecrest Neighborhood Association

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

City of Bellevue Comp Plan 2044 EIS Planning Department and Elizabeth Stead,

Submitting request to be a person and organization of record: Erin Powell, u2mngpio@icloud.com and for our Neighborhood Association namely, Bellecrest Neighborhood Association for the Comp Plan 2044 EIS process. Also include Renay Bennett, renaybennett@msn.com as an interested person of record.

Bellecrest Neighborhood Association and the individuals here support and agree with the Bridle Trails Community Club letter of concerns and objects to Bellevue's Comp Plan 2044 EIS. Please refer to Bridle Trails Community Club letter of concerns as they reflect many of the same concerns we have within the Surrey Downs/Eastal area of Bellevue to which Bellecrest is identified as part of the West Bellevue area of town.

Thank you for your consideration,

Erin Powell
u2mngpio@icloud.com

Renay Bennett
renaybennett@msn.com

O-40-1 The persons listed and organization have been added as a party of record.

O-40-2 Comment noted.

O-40-1

O-40-2

O-41

COMMENT

RESPONSE

Share Copy link Download

From: Erin Kerway <erin.kerway@icloud.com>
Sent on: Monday, June 12, 2023 4:38:25 PM
To: CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Comp Plan 2044 <CompPlan2044@bellevuewa.gov>
CC: Council <Council@bellevuewa.gov>; City Manager <CityManager@bellevuewa.gov>; Hellman, Mark <MHellman@bellevuewa.gov>; McCormick-Huestelman, Mike <MHuestelman@bellevuewa.gov>; pjohnston <pamjjo@msn.com>; Cuthill, Theresa <TCuthill@bellevuewa.gov>; WCA Board <woodridgebellevue@gmail.com>
Subject: Re: DEIS and Registered Neighborhood Associations

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

Please add the Woodridge Community Association to this list as well. Our neighborhood has not been informed of the DEIS and we are an interested party.

Erin Kerway, President
 Woodridge Community Association
WoodridgeBellevue@gmail.com
 1861 123rd Ave SE, Bellevue, WA 98005

On Jun 10, 2023, at 11:40 PM, pjohnston <pamjjo@msn.com> wrote:

The City has solicited neighborhood associations to be added to the Registered Neighborhood Associations. Yet, this is not used for the DEIS. How was the distribution list of organizations defined? Why was the Registered Neighborhood Associations list not be part of the distribution list?

Please add

Bridle Trails Community Club
 6619 132nd Avenue NE #133
 Kirkland, WA 98033
board@bridletrailscommunity.org

Cordell,
Annika Johnston
 425-881-3301

O-41-1 Your organization has been added as a party of record.

O-41-2 Your organization has been added to the distribution list.

O-41-1

O-41-2

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COMMENT

RESPONSE



June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 DEIS Comments / SRM 991 118th Ave SE comment letter

Dear Mr. Pittman:

We are writing to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

SRM owns the property located at 991 118th Avenue SE ("property") and is currently contemplating a site-specific rezone to allow for additional residential density on the property. The property is well-located in a transit-rich area and accessible to two light rail stations (South Bellevue and East Main). The 118th Avenue corridor is proximate to downtown Bellevue and should be considered for growth opportunities. The following are SRM's comments to the Comprehensive Plan:

Land Use

- SRM supports Alternative 3 for the Property, which includes an "MU-M" designation. It is unclear what residential density is allowed by this designation, we recommend at least an FAR of 4 to provide the ability to build a 5- or 6-over-2 residential product on the site.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban

O-42-1

The Preferred Alternative studied in the FEIS includes a future land use designation of MU-M on the site indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on the land use designations. See also Common Response 19 Zoning Details. The analysis of development agreements is outside of the scope of this EIS.

O-42-1

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June 12, 2023
Page 2 of 3

O-42-2 development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City.

- The City has recently completed its Phase 1 affordable housing amendments, is studying its Phase 2 affordable housing amendments, and is looking at finalizing the C-1 amendments. SRM supports the creation of more affordable opportunities in Bellevue and supports these types of legislative efforts to increase affordable housing by incentivizing density.

Transportation

- Parking requirements. Parking ratios in urban areas like the property should also be lowered. The property is between two light rail stations and currently high parking ratios limit infill or redevelopment of the property. Allow the market to decide parking ratios. Please study no minimum parking in areas like our property in the FEIS.

Critical Areas

- The “critical areas penalty” would currently apply to any redevelopment of the property and may prevent any redevelopment of the property to something more environmentally friendly. The DEIS does not adequately study the City’s critical areas regulations and provide options to the decision-makers for consideration. Consider eliminating the critical areas penalty altogether, which would allow for development consistent with stormwater and critical areas codes, and a better environmental outcome than what currently exists on the property. The FEIS should consider this type of flexible regulatory environment.

Affordable Housing

- As a housing developer in many jurisdictions, SRM is aware of the need for affordable housing. Any affordable housing requirements should not stymie the development of housing units and should instead incentivize development. There are currently not enough housing units in the region; incorporating a regulation that reduces the velocity at which units can be produced would be a mistake. The FEIS should disclose the various economic analyses that were performed as part of the DEIS and its study of affordable housing options, and it should disclose how many affordable units were produced as part of the housing programs presumed.

Other Issues

- “Air quality buffers”. The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would appear that the property would be subject to such an air quality buffer, which would prevent redevelopment into housing. It is unclear that the City could implement such an air quality buffer and meet its housing and development goals. The Final EIS should eliminate this recommendation.
- Impervious Surfaces. The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The

O-42-2 See Common Response 19 Zoning Details.

O-42-3 Comment noted.

O-42-4 See Common Response 16 Critical Areas.

O-42-5 See Common Response 4 Housing Alternatives.

O-42-6 See Common Response 8 Air Quality/GHG.

O-42-7 Comment noted.

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COMMENT

RESPONSE

June 12, 2023
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O-42-8

requirement of significant pervious areas on dense urban sites should not be a part of future urban zoning regulations. Most other urban jurisdictions have identified ways to address storm water quality and lush landscaping without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

O-42-9

- Views. The DEIS should acknowledge that future development will impact views and solar access. The Final EIS should acknowledge that redevelopment will inevitably impact view and shadows in this way. Redevelopment of the property and the City is not possible without creating some view and shadow impacts; but it is not likely that any of these impacts would be significant. The City should not protect views from I-405.

We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,



Conor J. Hansen
Managing Principal, Affordable Housing
SRM Development

O-42-8 See Common Response 19 Zoning Details.

O-42-9 See DEIS Chapter 6, *Aesthetics*, for a discussion of how future development will impact views and increase shadow in the city. As discussed on page 6-13, all the alternatives would have some impacts on viewsheds because all alternatives expect some level of housing, commercial square footage, and job growth; this growth would be reflected in more building massing than in current conditions. Similarly, as discussed on page 6-36, all the alternatives are expected to have shadow impacts greater than current conditions due to growth. As concluded on page 6-13, with the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows are expected. Finally, there are no current plans to protect views from I-405 under any of the alternatives.

O-43

COMMENT

RESPONSE

I am submitting this letter via the portal just to be sure it is received. We also submitted the same letter via email on Friday, June 9.



June 9, 2023

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

City of Bellevue Community Development
Attn: Thara Johnson
450 110th Ave NE
Bellevue WA 98004

VIA EMAIL to CompPlan2044EIS@bellevuewa.gov
with a copy to: Thara Johnson, Planning Manager at tmjohnson@bellevuewa.gov

RE: DEIS Comments for Wilburton Vision Implementation EIS

Dear Ms. Johnson:

Thank you for this opportunity to provide comments on the City’s Draft Environmental Impact Statement (“DEIS”) for the Wilburton Visioning process and Comprehensive Plan update. This firm represents Beta-Bellevue Auto Center, L.L.C. (“Beta-Bellevue”). Beta-Bellevue is the owner of property in the City of Bellevue’s Wilburton planning area, located at 620 – 638 116th Ave NE (“Beta-Bellevue Property”). The Beta-Bellevue Property is a lightly developed, approximately 134,000 SF parcel located less than 500 feet from the Sound Transit Wilburton Station.

This comment letter supplements our comments during the May 18th and June 1st DEIS public meetings. We also submitted a scoping letter dated October 28, 2022 during the scoping comment period on the DEIS. In sum, this letter:

1. Supports Alternative 3, with modifications and clarifications as detailed in this letter, including keeping the incentive-based affordable housing policy, but removing the possibility of mandatory affordable housing from Alternative 3;
2. Requests that the City clarify the land use typologies, with the goal of encouraging flexibility for long-term planning and development;
3. Requests that the City strike Figure 11-28 from the FEIS (see p. 11-56 of the DEIS), which could be misconstrued to impose a street grid over Wilburton, negatively impacting 40+ properties and working against thoughtful project and long-range planning goals for the core of Wilburton;

O-43-1 Comment noted.

O-43-2 See Common Response 4 Housing Alternatives.

O-43-3 See Common Response 19 Zoning Details.

O-43-4 See Common Response 10 Wilburton Street Grid.

O-43-1

O-43-2

O-43-3

O-43-4

O-43

COMMENT

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O-43-5	4. Supports the location of the Grand Connection running directly east from NE 6 th St to I-405; and	O-43-5	Comment noted.
O-43-6	5. Requests that the contemplated 500-foot buffer for “air impacts” be removed because (1) the 500-foot buffer will significantly reduce development capacity in the station area, which conflicts with the City’s transit-oriented-development (“TOD”) and GHG reduction goals; and (2) any impacts can be addressed through existing building technology (as already identified in the DEIS).	O-43-6	See Common Response 8 Air Quality/GHG.
O-43-7	This letter supplements the WPOG letter to which Beta-Bellevue is also a signatory. Please accept the following comments on the DEIS that are intended to help the City refine the FEIS to align with the City’s stated goals for the Comprehensive Plan update:	O-43-7	Comment noted.
O-43-8	<p>1. Beta Bellevue supports a modified iteration of Alternative 3 that maximizes residential density near the transit station.</p> <ul style="list-style-type: none"> • Support Mixed Use – Highrise 3: Beta Bellevue supports Mixed Use – Highrise 3 as identified in Alternative 3 as related to the Beta-Bellevue Property, and requests that the City keep this designation. <ul style="list-style-type: none"> ○ Beta Bellevue agrees with the identified 45-story height authorization (or taller) as appropriate for Mixed Use Highrise, with the expectation that development regulations will allow adequate FAR to fully develop those height limits, and provide FAR bonuses and/or exemptions related to amenities and affordable housing that encourage redevelopment at higher densities through land use incentives. ○ As noted in our DEIS scoping letter, this area is currently developed with low-intensity, commercial uses, which means that providing high-rise residential development would not displace any existing housing types. This TOD option is consistent with, and advances, the City’s existing and pending comprehensive planning documents. • Strike Mandatory Affordable Housing in Mixed Use Centers: Alternative 3 proposes a mix of mandatory and incentive-based affordable housing, with mandatory inclusionary affordable housing required in Mixed Use Centers (see, e.g., DEIS p. 7-59). The mandatory affordable housing requirement under Alternative 3 in Mixed Use Centers should be stricken – or, at very least, modified – to allow flexibility for incentive-based affordable housing policies in the development regulations that will follow the Comprehensive Plan update. <ul style="list-style-type: none"> ○ The City’s Comprehensive Plan already establishes an incentive-based policy in exchange for increased development capacity, not mandatory 	O-43-8	The Preferred Alternative studied in the FEIS includes a future land use designation of MU-H-3, which is similar to Alternative 3. See DEIS Appendix B, <i>Land Use Patterns and Urban Form Appendix</i> , for more information about future land use designations.
O-43-9		O-43-9	See Common Response 19 Zoning Details.
O-43-10		O-43-10	Comment noted.
O-43-11		O-43-11	See Common Response 4 Housing Alternatives.

O-43

COMMENT

RESPONSE

O-43-12 Comment noted. See Response to comment O-43-11.

O-43-13 Comment noted.

O-43-14 See Common Response 19 Zoning Details.

O-43-12

exactions. See Comprehensive Plan Policy LU 28.4 (“Consider a land use **incentive system** that offers additional floor area in exchange for infrastructure and amenities that contribute to the public good.”). The City should follow its pre-established policy directive. A mandatory program is not an “incentive system.”

- Incentive-based affordable housing is a more effective means of attaining affordable housing as part of high-quality residential redevelopment. This is particularly true for the Wilburton area, where the City desires to maximizing the TOD opportunity. The provision of housing requires market flexibility and incentives that encourage development – not mandates that limit or prevent development.
- The City should not pigeon-hole the Mixed Used Centers into mandatory affordable housing in the Comprehensive Plan update; it should instead leave options open to establish a market-supported incentive system when development regulations are drafted.

O-43-13

- At the public meetings, many community members expressed support for affordable housing, including members who supported incentive-based affordable housing over mandatory policies. Community members from the Wilburton area also expressed their support for maximum flexibility and the biggest “envelope” possible for development. Incentive-based affordable housing achieves both the flexibility and the density that the community wants in Wilburton.

2. Land use typologies should be clarified to maximize flexibility.

O-43-14

- **Clarify that “Mixed Use Highrise” may be residential *and/or* office:** The “land use types” identified in the DEIS are unclear. For example, the DEIS states that “Mixed Use Highrise” would be a “mix of residential and office uses.” It is unclear what that “mix” means. The City should clarify that the “Mixed Use Highrise” typology can be a “mix” of residential and office, as dictated by the market. Residential and office uses each have unique demands and financing obligations that fluctuate independently of each other. A prescriptive “mix” of office, residential, or other uses could slow or stop redevelopment in Wilburton, and should not be required in the Comprehensive Plan or in future codes.

- “Mixed-Use Highrise” should be clarified to state: “mix means a mix of residential **and/or** office uses”.
- This clarification would allow towers to be filled with 100% office or residential uses as the market allows, with certain requirements for street-

O-43

COMMENT

RESPONSE

O-43-15 Comment noted.

O-43-16 See Common Response 10 Wilburton Street Grid.

O-43-17 Comment noted.

O-43-18 See Response O-43-16.

level activation for commercial uses that support the residential and/or office use in the stories above.

O-43-15

- **Prioritize Residential:** If the City intends to require certain percentages or ratios of uses within Mixed Use Highrise (which we discourage), it should prioritize residential uses. To maximize flexibility, there should not be a cap on the total amount of residential development allowed within a zone.

3. Strike Figure 11-28 (Wilburton Study Area Draft Circulation and Permeability).

O-43-16

- **The City should strike Figure 11-28 from the FEIS.** The figure creates an unnecessary grid impacting 40+ properties that is not required for any aesthetic or transportation mitigation.



O-43-17

- In support of the request to strike Figure 11-28, the attached Transpo Group Study concludes: “The DEIS does not include information to substantiate the need for ‘access’ connections. It is unclear the value of the figure. As such, we suggest it be removed.”¹

- The DEIS includes only one paragraph describing Figure 11-28:

“The Action Alternatives assume there would be additional *multimodal connections* in the Wilburton study area; a conceptual diagram showing potential connections is shown in **Figure 11-28**. Therefore, the *pedestrian network* may have additional connections beyond those provided under the No Action Alternative providing a benefit to the area (though they would not count toward the MIP system completeness metric). Therefore, no adverse impact on the Wilburton study area pedestrian network is identified under the Action Alternatives.” (emphasis added).²

O-43-18

- Figure 11-28 is described in the DEIS as “conceptual” and shows “potential connections”. The figure also notes on its face that it is “illustrative only”. But it is not clear what the figure is illustrative of, what purpose it serves in the DEIS, or

¹ Transpo Group Study dated June 9, 2023, p. 1.

² DEIS p. 11-54 and 11-57

O-43

COMMENT

RESPONSE

O-43-19 See Response to O-43-16.

O-43-20 See Response to O-43-16.

if it is showing outdated and hypothetical access connections that first appeared in the 2018 Wilburton DEIS.

- Including Figure 11-28 in the DEIS will adversely impact the redevelopment of Wilburton.
 - Figure 11-28 draws a grid across at least 40 different parcels of private property. It is not clear what “access” means, or the difference between “access” and “non-motorized.” If the lines remain, this figure could be misused to demand a pre-defined grid of undefined “access” connections for redevelopment in Wilburton, running from Overton Lake south to NE 4th St and from I-405 to 102nd Ave NE.
 - Although Figure 11-28 is discussed as an “illustrative only” diagram showing “access” and “non-motorized” connections, there has been confusion in other areas of the City over figures that are construed as *requiring* placement of certain connections. If this were to happen, Figure 11-28 would prevent viable development, because the properties would be sliced and diced in a manner that does not allow full development of the uses studied for those properties under the DEIS (e.g., Mixed Use Highrise). This application would be inconsistent with the goal of creating TOD that maximizes development potential in this part of Wilburton.
 - Similarly, if “access” is misconstrued to mean dedicated right-of-way, it will further prevent viable development of the affected properties because it would require elements of development that severely hinder or even prevent redevelopment; for example, utility easements and easements for curbs / sidewalks. Perhaps most significantly, the City prohibits underground garages beneath dedicated right-of-way, which would make it impossible to design and build projects that effectively incorporate underground garages in this area.
 - If Figure 11-28 remains, the City must analyze and disclose its impact on the development potential in Wilburton.
- The text supporting Figure 11-28 appears to state that new development may require additional connections. That sentiment can be included in the FEIS without the additional uncertainty and potential problems associated with Figure 11-28.
 - This sentiment is already captured in Table 2-9 on page 2-3 of the DEIS: “[n]ew multimodal connections create smaller, more walkable blocks throughout the Wilburton study area, but with a greater emphasis in the mixed-use node.”
 - The City could retain Table 2-9 but replace Figure 11-28 with a clear statement that: “New access connections, if any, should be identified during

O-43-19

O-43-20

O-43

COMMENT

RESPONSE

O-43-21 The EIS does not say the street grid is mandatory. It says it is a “conceptual diagram showing potential connections.”

O-43-20

project permitting informed by a project-specific transportation study. When new connections are required, the City authorizes private easement roads (that allow for underground improvements) in lieu of dedicated right-of-way.” The attached Transpo Group Study supports this recommendation: “The narrative in the EIS should be modified to specifically note that the number and location of these “access” connections will be based on future development.”

- o Private connections, not dedicated right-of-way, allow for master planning, shared underground garages, and additional flexibility to enact the City’s vision for Wilburton. As identified in the attached Transpo Group Study: “The narrative lacks definition as to whether this access is a private street or public right of way (ROW). In order to achieve the high density envisioned in the plan, it will be necessary to consider shared on-site parking between buildings spanning a larger footprint. If these access roads were considered public ROW that would impact the overall footprint and limit the ability to constructing parking beneath the access connections. This would limit the parking plate sizes, ultimately increasing development costs for the site.”

O-43-22 The route of the Grand Connection is outside of the scope of this EIS.

O-43-21

- **Alternatively, if the City does not strike Figure 11-28, it should clarify that it does not mandate a street or access grid:** Striking Figure 11-28 is the cleanest and simplest way to avoid the potential confusion it creates. However, if the City does not strike Figure 11-28, the City should provide analysis and clear language in the FEIS to clarify that: (1) Figure 11-28 does not mandate placement or construction of the “access” grid; (2) the “access” lines shown on Figure 11-28 are not intended for vehicular access or a dedicated right-of-way; (3) placement of any private access routes through a property will be planned as part of project-specific permitting, and specific placement of access routes is not mandated by the Comprehensive Plan.

O-43-22

4. The Grand Connection is appropriately placed / Roads connecting 116th Ave NE to 120th Ave NE.

- The City should maintain the location of the Grand Connection running from NE 6th Street across I-405 to Eastrail. This location of Grand Connection is a logical connection point that allows for safe movements and signalization as identified in the City’s DEIS, which connects the City to the new Eastrail trail network.
- We understand there may have been requests that the City reconsider the location of the Grand Connection (or a portion thereof) on the east side of I-405. We ask the

O-43

COMMENT

RESPONSE

O-43-23 With the exception of the extension of NE 6th to 120th, the alignment of future streets and pathways is outside of the scope of this EIS.

O-43-22

City not to revise the location of the Grand Connection for the following reasons, which are supported by the Transpo Group Study attached to this letter:

- Moving the Grand Connection (or a portion thereof) north would locate it in close proximity to NE 8th St. This would impact the function and operation of 116th in ways that would require additional study.
- Moving the Grand Connection (or a portion thereof) north would reduce the amount of space available for TOD residential development, conflicting with the City's TOD goals.
- Moving the Grand Connection (or a portion thereof) north would create a misalignment with City Hall, the light rail, the potential future lid park, and the potential future bicycle and pedestrian bridge, which the City and its partners have invested significant time and resources into studying and designing.
- Any northward movement of the Grand Connection would also conflict with the existing structures that may not be redeveloped in the future, and poses additional challenges due to the existing system of onramps and offramps for I-405, south of NE 8th Street.

O-43-24 See Common Response 8 Air Quality/GHG.

O-43-23

- Similarly, the FEIS should not include any east-west roads or pathways connecting 116th to 120th on the Beta-Bellevue Property. As identified in the attached Transpo Group Study, roadway or pathways located north of the planned Grand Connection could impact operations of 116th Ave NE and pose additional challenges because of the system of onramps and offramps for I-405 south of NE 8th Street. It would also seriously limit or prevent redevelopment on the Beta-Bellevue Property, conflicting with the goals of the Comprehensive Plan update.

5. A 500-foot buffer is not needed as a mitigation measure for air impacts.

O-43-24

- **The City should strike the 500-foot buffer mitigation measure for air impacts:** Page 8-21 of the DEIS lists measures that could be applied to any of the alternatives to reduce exposure to air pollutants, including: “[t]he leading measure is to limit development of residential units with land use buffers (e.g., within 500’ of major roadways in the City).” The proposed 500-foot buffer from “major roadways” should be stricken because it conflicts with the TOD goal for Wilburton, and increases negative air impacts.
 - As the DEIS repeatedly notes, TOD is a climate solution. If development is prevented or limited in TODs because of 500-foot setbacks, that density will be pushed into other areas that do not benefit from proximity to transit.

O-43

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O-43-24
O-43-25
O-43-26

This will increase reliance on motor vehicles, which will negatively impact greenhouse gas emissions and air quality.

- o Existing technology for buildings will mitigate any air impacts. For example, the DEIS already acknowledges and identifies this mitigation on page 8-22 (“[p]romote the use of high-efficiency ventilation filters in buildings within 1,500 feet of high-volume roadways”). This is the most effective way to reduce impacts to air quality without reducing TOD density.

- **The City should clarify terminology related to air impacts:** In addition to removing the 500-foot setback mitigation, the City should clarify the terminology used in its analysis of air impacts. For example, the FEIS should specifically identify the threshold for the “major roadways” or the “high-volume roadways” that trigger necessary air-related mitigation. These terms are not defined, leaving it unclear whether a “major roadway” could include NE 116th Ave NE, NE 8th St., NE 4th St. etc. A 500-foot setback from these roadways would significantly reduce the development capacity in Wilburton.

- **The City should support its thresholds and analysis with data:** The FEIS should use health data to identify significant air impacts and mitigation for the same. Currently, the DEIS terminology, thresholds, and rationale for exceeding the threshold for significant adverse environmental impacts are unclear and appears to be unsupported by data. The result is that the DEIS is ambiguous as to what mitigation will be required, and where.

Thank you for the opportunity to provide these comments on the DEIS. We look forward to working with the City as it continues the process of working on the Wilburton amendments and LUCA in the near future.

Sincerely,



Jacquie Quarre
Tharsis Law

Enclosure: Transpo Group Study dated June 9, 2023

O-43-25 DEIS Appendix J, *Air Quality and Land Use Planning Report*, includes a definition of high-volume roadways as, “a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.” The city may choose another definition if regulations are developed.

O-43-26 See Common Response 8 Air Quality/GHG.

O-43

COMMENT

RESPONSE



MEMORANDUM

Date: June 9, 2023 **TG:** 1.21260.00
To: Jeremy Eckert & Jacquie Quarre, Tharsis Law P.S.
From: Michael Swenson, PE, PTOE
Subject: Wilburton Vision Implementation Draft EIS Transportation Review Comments

This memorandum summarizes our comments on the DEIS related to two primary items.

1. Wilburton study area and Draft circulation and permeability graphic
2. Alignment of the Grand Connection east of I-405

Wilburton Study Area and Draft Circulation and Permeability Graphic (Fig 11-28)

Figure 11-28 of the DEIS includes a depiction of future access connections east of 116th Avenue NE. There are several issues with the presentation of this figure as noted in the following: "The Action Alternatives assume there would be additional multimodal connections in the Wilburton study area; a conceptual diagram showing potential connections is shown in Figure 11-28. Therefore, the pedestrian network may have additional connections beyond those provided under the No Action Alternative providing a benefit to the area (though they would not count toward the MIP system completeness metric). Therefore, no adverse impact on the Wilburton study area pedestrian network is identified under the Action Alternatives." Since the graphic also contains non-motorized connections, it is presumed that these connections are for the vehicle network.



The DEIS does not include information to substantiate the need for the "access" connections. It is unclear the value of the figure. As such, we suggest it be removed. If it were to remain, we request that the following issues be addressed:

- The number and location of vehicle connections are shown illustratively. However, there is not the appropriate narrative to note that these connections can and should be defined based on future development. To optimize the development potential and achieve the high density envisioned by the City, the location of these access roads will need to respond to future development in this area and not be preset based on the graphic in the EIS. **The narrative in the EIS should be modified to specifically note that the number and location of these "access" connections will be based on future development.**

O-43

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- The narrative lacks definition as to whether this access is a private street or public right of way (ROW). In order to achieve the high density envisioned in the plan, it will be necessary to consider shared on-site parking between buildings spanning a larger footprint. If these access roads were considered public ROW that would impact the overall footprint and limit the ability to constructing parking beneath the access connections. This would limit the parking plate sizes, ultimately increasing development costs for the site. **The intended classification for these access connections should be better defined in the EIS.**

Alignment of the Grand Connection east of I-405

The City should maintain the location of the Grand Connection running from NE 6th Street across I-405. The location of Grand Connection running from NE 6th Street across I-405 is a logical connection that allows for safe movements and signalization as identified in the City's DEIS. Shifting the connection from its current location would need to consider the following impacts:

- Moving the Grand Connection north would locate the Grand Connection in close proximity to NE 8th Street. Depending on the configuration of the connection at 116th Avenue NE (i.e. surface or grade separated), locating it closer to NE 8th Street could impact the function and operations of 116th Avenue NE that need to be studied further.
- Moving the Grand Connection north would create a misalignment with City Hall, the light rail, the potential future lid park, and the potential future bicycle and pedestrian bridge that the City and its partners have invested heavily into studying and designing.
- Any northward movement of the Grand Connection would also conflict with the existing structures that may not be redeveloped in the future, and poses additional challenges because of the system of onramps and offramps for I-405 south of NE 8th Street.



O-44

COMMENT

RESPONSE

O-44-1 The Preferred Alternative studied in the FEIS includes a future land use designation of R-Medium on the site indicated, which is similar to Alternative 1. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations. See also Common Response 19 Zoning Details.

1515 Bellevue Way LP

June 12, 2023

VIA ELECTRONIC MAIL

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

Re: Bellevue 2044 EIS Scoping Comments

Dear Mr. Pittman:

We are submitting this letter to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

1515 Bellevue Way LP owns “The Park in Bellevue” apartments at 1515 Bellevue Way NE, immediately north of Downtown in the Northwest Bellevue Subarea (the “Property”). The Property comprises an area of approximately 9.4 acres and is developed with 23 multifamily residential buildings containing a total of 184 dwelling units – a density of 20 units per acre.

Our comments are as follows:

- We support Alternative 3 in the DEIS. However, the DEIS should also include a study of the enhancement of zoning in the Bellevue Way corridor just north of the Downtown. The Property is presently zoned R-20. Outside of the mixed-use and urban center zones, the densest multifamily zones in Bellevue are the R-20 and R-30 zones, allowing a maximum of 20 and 30 dwelling units per acre, respectively. These zoning designations are now over 40 years old. They date back to a time when the predominant multifamily typology in Bellevue was two-story walk-up apartments with large areas of surface parking.
- This 40-year-old zoning reflects a density that is 80% to 90% less than comparable 6 or 7 storey (5-over-1 or 5-over-2) apartment development that is predominant in the market throughout the Puget Sound. It would be appropriate to update this zoning to current standards in locations adjacent to major urban centers as it would add hundreds, if not thousands, of units to the City’s housing inventory. Bellevue Way is a major arterial and the Property is located adjacent to Downtown so upgrading the site zoning to accommodate 5-over-2 development is appropriate. We note that upgrading the zoning in this key location, to expand the housing inventory, can be accomplished while still providing generous usable open space and neighborhood buffers.

10900 NE 4th Street, Suite 1440 • Bellevue, Washington 98004 • (425) 462-0700 • Fax (425) 462-0760

O-44-1

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June 12, 2023
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O-44-2

- It is widely acknowledged that there is a housing crisis in Bellevue and The City cannot afford to forego this opportunity to update 40-year-old zoning in an effort to address this issue. Failure to update this zoning adjacent to the densest development center in the City – the Downtown – would be a reaffirmation of the small-scale suburban development pattern rejected in Alternative 3.
- The City should be looking to add density in areas where transit is in place today, and also where it prefers transit to be in the future. In 2019, Bellevue Way north of the Downtown experienced 22,600 average weekday car trips. Given the high volumes of traffic and the direct access from Downtown to SR 520 along Bellevue Way (bypassing 405 and serving more of West Bellevue), it would seem likely that this will become a more transit-heavy corridor in the future. Anticipating the additional transit service, sound urban planning practices suggest it would be appropriate to update the zoning with increased density along Bellevue Way north of the Downtown core.


O-44-3

O-44-4

Finally, we note that the land use analysis in the DEIS does not accurately depict the structure of the City's Comprehensive Plan. The DEIS collates the many various Comprehensive Plan land use designations in a smaller, simpler list of land use categories. In fact, the Comprehensive Plan future land use map simply mirrors the many distinct zoning categories throughout the City and includes far too many classifications. This unnecessary complexity in the future land use map is an obstacle to zoning evolution in the City, since a rezone application must also be supported by an associated Comprehensive Plan amendment. Instead, the Comprehensive Plan should be based on a simpler list of land use categories. The DEIS should note this distinction and should discuss the merits of transitioning the future land use map to a more flexible structure with far fewer land use categories.

We appreciate the opportunity to provide these comments.

Sincerely,



1515 Bellevue Way LP

O-44-2 Comment noted.

O-44-3 See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*. This document is an appendix that relates to DEIS Chapter 3, *Land Use Patterns and Urban Form*. 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, including the preferred alternative, at the end of DEIS Appendix B.

O-44-4 See Common Response 18 Future Land Use Categories.

O-45

COMMENT

RESPONSE

O-45-1 Comment noted.

O-45-2 Comment noted.

Jane G. Blair
Lindsey Properties LLC

June 9, 2023

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

Re: Bellevue 2044 Comprehensive Plan DEIS

Dear Mr. Pittman:

Lindsey Properties LLC is the owner of the property located at 120 -116th Avenue NE in Wilburton and we are writing to provide comments on the Draft Environmental Impact Statement ("DEIS") prepared by the City of Bellevue ("City") for the Bellevue 2044 Comprehensive Plan Update. We have owned the property for over 100 years and are deeply committed to the future of the Wilburton neighborhood.

We support Alternative 3 to be adopted as the Preferred Alternative in the Final EIS. Alternative 3 provides the most flexibility in future uses in the Wilburton subarea and is consistent with the direction provided by the City Council for future development in Wilburton. It creates the greatest opportunities for jobs and housing in the neighborhood.

We also want to endorse and support the DEIS comment letter from the Wilburton Property Owners Group. Please consider those comments incorporated here. We appreciate the opportunity to provide these comments and look forward to working with the City as the plan moves forward.

Sincerely,

Jane G. Blair
206-595-1999

Cc:
Becky Gordon
Joseph Golberg

O-45-1

O-45-2

O-46

COMMENT

RESPONSE



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

American Capital Group
15 Lake Bellevue Dr. Suite 200
Bellevue, WA 98005

June 12, 2023

RE: Bellevue Comprehensive Plan DEIS

Dear Reilly,

American Capital Group (ACG) is a Bellevue native, a leading West Coast Real Estate Developer, and a local small business that has called the City of Bellevue our corporate home for nearly 4 decades. Our personal home for even longer. Despite our longstanding presence in the City, our attempts to develop nearly 1,000 apartment homes in Wilburton and Bel-Red over the past 3 years have been unsuccessful. We attribute this to factors such as the City's focus on the Comprehensive Plan Update and the lack of staff resources to review our proposals.

Our corporate office is on Lake Bellevue, and our parking lot is the largest developable site around the lake, directly adjacent to the Wilburton light rail station. It is an underutilized property, just one of many lots around the City, near a major transit station with immense untapped potential. As owners of multiple businesses and property in Wilburton, we have a vested interest in its health, success, and the impacts of the City's decisions during these updates.

We believe it is important to plan Wilburton with flexibility in mind. The City, region, and economy is changing at a pace we haven't seen in generations and our ability to meet the needs of the City for the next 20 years relies on our decisions throughout this process embracing that fact.

We appreciate the City's thoughtful and patient consideration of the future of Wilburton and Bellevue's many great neighborhoods. We look forward to working with the City on comprehensive solutions to serve the people of this great community for years to come.

ACG supports Alternative 3 as the preferred alternative in the Final EIS.

Alternative 3 supports the greatest opportunity for growth in an area well served by transit. While the City has benefitted from the infrastructure investment in the region's major transit stops and light rail, we have fallen short of zoning these areas to allow the density that will most benefit the majority of the Wilburton and Bellevue population, especially in regard to affordable housing. Without a healthy supply

O-46-1 The Preferred Alternative studied in the FEIS includes future land use around Lake Bellevue with a RC-M character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

O-46-2 Comment noted.

O-46-3 Comment noted.

O-46-1

O-46-2

O-46-3

O-46

COMMENT

RESPONSE

O-46-4 See Common Response 19 Zoning Details.

of housing, preferably within walking distance to major transit stops and light rail, the City will have a great challenge finding feasible, impactful, solutions to contribute to our affordable housing needs.

All alternatives should include high density flexible zoning around Lake Bellevue

In the original EIS Lake Bellevue was left out of all proposed alternatives. In the DEIS this year, Lake Bellevue was included in Alternative 3 but not to the height and density required for most development achieve feasibility. The Wilburton light rail station and the Grand Connection pedestrian bridge are located right next to the lake with no existing housing nearby to use them. The existing zoning allowed for any use in this area is the below bare minimum, unsupportive of any development that would serve the community and a great example of a massive opportunity missed for the City of Bellevue.

O-46-5 The analysis of Planned Unit Development and design review is outside of the scope of the EIS.

Concerns were raised by the City throughout multiple meetings regarding the potential environmental impacts of developing the surrounding Lake Bellevue area, yet the EIS required for the light rail proved those impacts are minimal. We hired an independent environmental consultant prior to our Comprehensive Plan Amendment application that was not supported by the City to ensure our vision for this area would not negatively impact the environment or the lake. It was determined by our consultant that our proposed development (and any proposed development in this area) would be an improvement over the existing condition and to the environment of Lake Bellevue. They stated "Based on the conceptual project design that results in no net increase of impervious surfaces and the modernization of the existing stormwater system meet current standards, it is expected that there will be a modest improvement in water quality, a leveling of peak flows, and maintenance of hydrology to Sturtevant Creek. For heavily urbanized areas such as the subject property, improvements in these functions are crucial for downstream fisheries including federally listed species such as Winter Steelhead and Fall Chinook, which are both identified as present in the downstream portions of Sturtevant Creek. In addition, Sturtevant Creek directly contributes to Kelsey Creek which is listed as a 303d water for temperature, bacteria, and dissolved oxygen. Improvements to water quality with the Kelsey Creek Basin has a clear benefit for the downstream systems." As part of this consideration, any burdensome Critical Areas Ordinance or unreasonable penalties such as the proposed "density penalty" will deter development in Wilburton and all areas of the City where this could be imposed. Since no critical area ordinance or buffers are applied downtown, other growth areas, and mixed use centers should receive similar treatment. In fact, all other proposed developments should have an alternative to a development focused penalty when considering development in these areas.

O-46-4

All Alternatives and the Comprehensive Plan update should encourage the highest density within walking distance of major transit stops and light rail, with flexible, market driven zoning.

The existing Comprehensive Plan was to drive housing and development near transit. Due to the lack of, or complexity of the current zoning we fell well short of meeting this goal. The updated plan must allow for flexibility in the base zoning, or at the very least a PUD (Planned Unit Development) process for variations in site design and density. This could be in return for a public comment period and design review to ensure compatibility with the setting. Currently there is no pathway to work together with the City towards smart development solutions if the zoning and development are not perfectly aligned. Objective HO-18 in the existing Comprehensive Plan calls for the City to "Promote working partnerships with housing developers to help create a variety of housing types in the community" Our experience through multiple proposals for new developments in many different sub areas of Bellevue is that we are far from achieving this goal. Three unsuccessful attempts can be attributed to not following through on this commitment. The next comprehensive plan can provide an opportunity to create the flexibility required to achieve this goal, saving the City and the public significant time and resources.

O-46-5

O-46

COMMENT

RESPONSE

O-46-6 See Common Response 10 Wilburton Street Grid.

O-46-6

All Alternatives should not include implementing a road grid.

Figure 11-28 of the DEIS appears to propose a road grid. ACG disagrees with the notion that a City-imposed road grid, disregarding property boundaries, topography, and the City's ability to deliver the road grid an efficient manner with regard to the development goals of Wilburton, would align with the vision of either proposed Alternative. The City should conduct a thorough examination to determine whether the access/road grid should be obligated to accommodate cars or if it should prioritize connections for pedestrians and bicycles, aligning with the transportation mitigation policies outlined in M-TR-1 through M-TR-4.

ACG commends the City's transportation mitigation measures outlined in M-TR-1 through M-TR-4, acknowledging the strong link between land use and transportation in mitigating transportation impacts. The City correctly identifies Alternative 3 as having inherent transportation benefits compared to the No Action Alternative. ACG shares this view, in a dense urban setting, promoting transit usage, and expanding pedestrian and bicycle networks are the most effective means of enhancing transportation efficiency and accommodating a larger number of people. Additionally, prioritizing walkability and bike-friendliness, rather than car-centricity, brings vitality to neighborhoods and supports local businesses and activities at the street level.

These pedestrian connections should be adaptable and consider property boundaries, ensuring these connections do not inadvertently hinder the vision for new development and the urban environment. An example of unnecessary proposed connections can be found on DEIS page 11-56. Specifically the area around Lake Bellevue. This figure proposes pedestrian paths and vehicular access lanes cutting through private property, not working with it. There is no existing or ability for future public access to or around Lake Bellevue, in fact, all Lake Bellevue development is located on the Lake itself and acts as a barrier to the Lake. Therefore, vehicular and pedestrian pathways around the lake as depicted in the following image are unnecessary and will negatively impact/deter development around Wilburton Station.



O-46

COMMENT

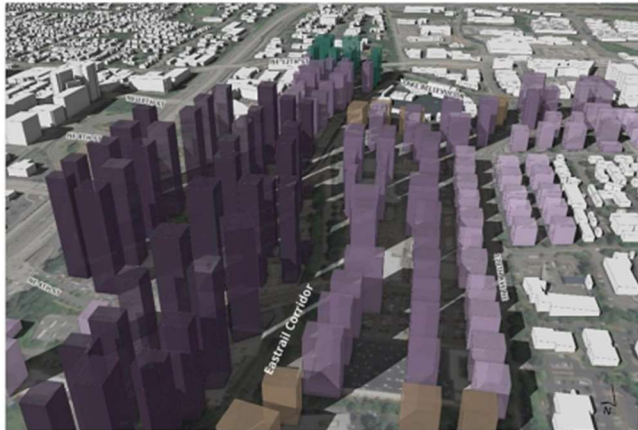
RESPONSE

O-46-7 Comment noted.

O-46-7

Density should be market/needs driven, especially around major transit stops and light rail stations. We encourage the City to allow greater height and density around Transit. Page 6-47 provides an example of how Alternative 3 reduces density near Wilburton Station and around Lake Bellevue. This area should mimic the heights along NE 8th or be taller. There is naturally occurring high groundwater in this area that will be a deterrent for subgrade parking, requiring future development to provide all above grade parking due to cost. In an area directly adjacent to Transit, we implore the City to consider allowing taller heights and greater density in these areas to foster future development and aim to achieve the most meaningful results near transit. The greater the density, the more achievable it will be for most developments to include affordable housing at the existing MFTE levels.

Figure 6-60 below provides a visual example of the City proposed reductions around Lake Bellevue.



O-46-8 The EIS discloses and analyzes environmental impacts associated with the growth alternatives identified in the EIS and then identifies potential mitigation for the impacts to the environment associated with those alternatives. However, the EIS is a disclosure document that is designed to inform future city policy decisions, but the EIS does not mandate that the city incorporate the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. Evaluating the wisdom of the mitigation measures identified in the EIS is outside of the scope of this EIS.

O-46-8

Proposed mitigation measures could stifle development goals.
 Requiring a "right to return" or Community Benefit Agreements for displaced businesses raises legal and procedural concerns. Instead, if the City decides to assist displaced small businesses, it should provide incentives in the Land Use Code, such as bonuses for small business spaces. Additionally, the City should facilitate ease of movement for small businesses by eliminating parking minimums for relocated businesses, streamlining tenant improvement and sign permits, waiving traffic impact fees, and considering higher SEPA thresholds for relocated businesses to avoid burdensome SEPA review. The City's proposal of an "MFTE" program for small business locations is a creative idea that could effectively retain small businesses. Before limiting redevelopment opportunities, the City should assess existing

O-46

COMMENT

RESPONSE

O-46-8

policies and procedures in Bellevue that hinder businesses from operating in the city. The potential impact of these mitigation measures should be thoroughly studied and disclosed in the FEIS. Requiring interior noise levels of 45 dBA or lower along noisy arterials will impose significant cost burdens on new projects, which will ultimately be passed on to tenants. Bellevue's noise requirements are more stringent than those of any other city. It is crucial to study the potential impact of implementing noise buffer areas or expensive windows that could hinder density in Wilburton or increase housing costs. ACG has developed in other jurisdictions directly on I-5 with far more friendly acoustic requirements and have been able to achieve a quiet, audibly safe living environment. The effects of these mitigation measures should be thoroughly studied and disclosed in the EIS. Including acoustic studies and comparisons to other jurisdictions with similar conditions.

O-46-9 Please see Common Response 6 Noise regarding the regulatory framework for noise levels.

O-46-10 Comment noted.

O-46-11 See Common Response 4 Housing Alternatives.

O-46-12 Comment noted.

O-46-9

O-46-10

The Preferred Alternative should not include affordable housing mandates.
We acknowledge the significant challenge of creating affordable housing for all income levels in our City and the region. Private development can contribute to addressing this issue by increasing the overall housing supply and incorporating affordable housing through well-designed height and density bonuses, as well as tax programs like MFTE. However, we believe that imposing strict affordable housing mandates on private development, which would raise the cost of housing and likely hinder further development, is not the appropriate solution for Bellevue. The mandatory inclusionary affordable housing program proposed in Alternative 3 should not be pursued in the FEIS Preferred Alternative.

O-46-11

Instead, in the Preferred Alternative, the City should explore the expansion of a carefully calibrated height or density-based affordable housing incentive program in Wilburton. Additionally, the City should explore alternative tools and funding sources that do not rely solely on private development to create affordable housing. When designing an incentive-based program, it should take into account the comprehensive cost of development, including infrastructure, building codes, development standards, and current market conditions. Lastly, the City should offer an in-lieu fee option within the incentive program, which can serve as a valuable funding tool for the City to directly support city-driven housing projects or partner with local nonprofits that develop and build affordable housing. The pricing of the in-lieu fee should be based on the value of the incentivized square footage to the development. Other incentives could include partial exemptions from City permit fees and finding thoughtful ways to assist developers in contributing to the City's affordable housing needs. HO-29 in the existing Comprehensive Plan encouraged the City to do just that. We should continue that line of thinking while taking a step back to consider the significant developer costs associated with these programs.

O-46-12

The Comprehensive Plan update should consider reviewing areas left behind during other Sub Area updates, like East Main.
Last year the City achieved a great milestone with the completion of the East Main Subarea plan. We applaud the efforts and time it took accomplish this task. The EM-TOD Districts aim was to provide mixed-use, transit-oriented Development within one-half mile of the East Main Light Rail Station. However, an example of an area that could have easily been a part of this reprogramming is the Northeastern corner of the Richards Valley Sub Area, a small unnecessarily isolated group of approximately 3 parcels that are suitable for higher-density residential development. This area is conveniently located just .7 miles from the East Main Light Rail Station and directly across from the Wilburton Park and Ride. By integrating daily commuters who can easily access transit on foot, the City can more efficiently revitalize underutilized properties in transit-served areas, fostering opportunities for future businesses, developments, and residents to flourish. The city should prioritize areas primed for development today while focusing on the needs of tomorrow.

O-46

COMMENT

RESPONSE

O-46-13 Comment noted.

O-46-14 Comment noted.

O-46-13

Doing so would allow for multiple new developments, including a residential development with approximately 264 market rate and 52 affordable units today. The City has an opportunity to expand the zoning in order to see an existing proposed development move forward. These considerations will also help the City come closer to meeting a number of housing goals, such as HO-11, HO-12, HO 14, HO-16, HO-18, HO-23, HO-26, and TR-7 from the current Comprehensive Plan.

O-46-14

In conclusion, as a long-standing local business and developer in Bellevue, ACG emphasizes the importance of flexible planning for Wilburton and the need for the City to embrace the changing landscape of the region. ACG acknowledges the City's thoughtful consideration and thanks the City's hard work thus far, as we look forward to collaborating on comprehensive solutions for the benefit of the community throughout this process.

ACG supports Alternative 3 in the Final EIS, emphasizing its potential to best address the City's housing needs and promote growth, especially near transit hubs. We encourage the City to permit higher density in all alternatives, to allow future developments to have the flexibility necessary to meet the needs of the community, especially in the East Main Corridor, the Wilburton Sub Area, and around Lake Bellevue. We recommend high-density zoning around Lake Bellevue and acknowledge the potential for high-density development to have a net positive impact on the Lake and the environment. The Comprehensive Plan should encourage market-driven density near transit, fostering partnerships with developers like ACG, who remain committed to the success of this City. The proposed road grid should be assessed for its impact on development and congestion with consideration given to property boundaries and pedestrian/bicycle connections. Mitigation measures like affordable housing and interior noise levels should be evaluated for their effect on development goals. ACG suggests exploring incentive-based programs and alternative funding sources for affordable housing. A flexible and adaptive approach to planning is crucial for smart and sustainable development in Bellevue.

Thank you for your outreach and commitment to our City. We welcome the opportunity to answer questions or provide additional comments should the opportunity arise and look forward to the positive impact these changes are sure to create.

Sincerely,

BJ Kuula: Chief Executive Officer
American Capital Group

Levi Singleton: Chief Operating Officer
American Capital Group

David Sinnett: Vice President of Development
American Capital Group

Sean Thorson: Director of Acquisitions
American Capital Group

O-47

COMMENT

RESPONSE

O-47-1 Comment noted.



June 12, 2023

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

[Via email to CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Bellevue 2044 Comprehensive Plan DEIS Comments

Dear Director Stead and Mr. Pittman,

As written in our scoping comments of October 27, 2022 (a copy of which is attached for your reference), we again share our thanks for your vital work to shape our City's future through the 2024 Comprehensive Plan process and its recently completed Draft Environmental Impact Statement ("DEIS"). We also appreciate the opportunity to provide comments on the DEIS.

Careage Health Care of Washington, Inc. ("Careage") and our senior living communities provide a complete spectrum of quality care for older adults of all ages and abilities. We have been a part of the Bellevue community since 1996, providing services such as rehabilitation and occupational therapy and degenerative chronic condition care to Bellevue's older citizens and others at our 60,000 square foot Mission Healthcare facility located at 2424 156th Avenue NE ("Mission Healthcare Site" or "Site"). The facility has operated for the past 25 years under a conditional use permit, and it does not currently provide residential services.

As Careage and the City look toward the future, we hope the Mission Healthcare Site will be able to provide additional residential density and services for active adults, senior citizens, and others with new facilities that replace the current outdated infrastructure. A redevelopment of the of the Site would better embrace its immediate proximity to the Bel-Red subarea, frequent transit (including frequent bus service and light rail), and Redmond's rapidly densifying Overlake mixed-use neighborhood.

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O-47-1

O-47

COMMENT

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As previously written, mixed-use development and densification on the Mission Healthcare Site could provide notable support for the City's housing and employment density goals, but this will not be possible unless the City makes comprehensive planning and zoning changes that support such redevelopment. The current DEIS Action Alternatives do not contemplate such changes, which is a critical misstep for the City that must be rectified in the FEIS. The Preferred Alternative should designate the MU-M designation for the Site to meet these goals.

- I. **The Preferred Alternative should designate future land use at the Mission Healthcare Site to at least "MU-M," rather than discouraging new housing with "MU-L."**

In our scoping comments, we requested that the City study extension of denser subarea and zoning designations to edge properties poised for redevelopment like ours. We were dismayed to see that the DEIS' action alternatives at most suggest a MU-L designation for the Site (Alternatives 2 and 3), which would only allow 2-4 stories of height. Such a designation is a major missed opportunity to support the City's housing and employment density goals.

As we have written during scoping and commented before the Planning Commission, the location of and uses surrounding the Mission Healthcare Site make it an excellent candidate for greater density of transit-oriented housing supply, including housing that could serve Bellevue seniors. The Mission Healthcare Site is situated at the corner of two major arterials (156th Avenue NE and Bel-Red Road), and based on the DEIS maps, is in both a frequent transit area and a Neighborhood Center. This provides an excellent opportunity for the Future Land Use Map in the Preferred Alternative to set the City's housing goals in motion by allowing senior housing or traditional housing to be developed on this site in its most cost-efficient typology, which is 6-8 story wood frame construction.

Further, the Mission Healthcare Site is directly across the street from portions of Redmond's rapidly densifying Overlake neighborhood where minimum structure height is proposed to be 6 stories, and maximum height is proposed to be between 14 and 30 stories for residential uses. Although that neighborhood is outside of the City's jurisdiction, immediately adjacent density is absolutely relevant in the land use context, and the Mission Healthcare Site provides the City with an opportunity to provide a gentle transition between Redmond's greater heights and lower-density areas of Bellevue further east. Likewise, immediately surrounding uses in the Overlake neighborhood and Bellevue's other adjoining properties are not occupied with sensitive users, so the Mission Healthcare Site is an opportunity to provide transit-oriented density with less risk of land use conflicts. Enclosed as an attachment is a study showing the immediately surrounding

O-47-2 The Preferred Alternative studied in the FEIS includes a future land use designation of MU-M for the site indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

O-47-3 Comment noted.

O-47-2

O-47-3

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O-47

COMMENT

RESPONSE

O-47-4 Comment noted.



O-47-5 See Common Response 19 Zoning Details.

O-47-4

uses, which include a gas station, shopping center, midrise multifamily buildings and an office park. The transit-oriented development that is possible on our Site would integrate seamlessly with these uses and be well buffered.

O-47-5

Finally, it should be noted that Alternative 3's proposed MU-L zoning is more or less equivalent in development potential to the Mission Healthcare Site's zoning at present, which is not consistent with the City's growing aspirations and goals for denser housing proximate to transit and sustainability. A reasoned increase to MU-M in the Preferred Alternative would better align with the City's stated policies and goals.

O-47-6 Comment noted.

II. Future land use designations within Neighborhood Centers should account for proximity to transit or other features that could influence a more complex future land use designation within each Center.

Generally, the DEIS is an impressive demonstration of how front-end environmental analyses can inform a preferred alternative that minimizes and mitigates negative environmental impacts to the greatest possible extent. To ensure consistency and thoroughness in this approach, however, the FEIS must account for transit proximity in future land use designations within Neighborhood Centers.

O-47-6

We understand that Alternatives 2 and 3 suggested the undesirable MU-L designation for the Site in part because the future land use designations proposed within Neighborhood Centers did not account for the nuances of proximity to transit or other local features that could influence a more complex future land use designation within each center. The FEIS should reconsider this approach because the environmental and public policy impacts within Neighborhood Centers will be directly changed – for better or worse – by the proximity of zoned housing density to transit. Whether in Neighborhood Centers or elsewhere, mapping future land uses without consideration of transit proximity is a recipe for inefficient housing growth and will burden the City's ability to meet its goals for traffic, greenhouse gases, other roadway pollution, and efficient growth of new housing stock.

The FEIS must map future land uses in the Preferred Alternative based on proximity to transit in Neighborhood Centers in order to inform both a complete disclosure of environmental impacts and the best possible alternative for our community and our goals.

III. In addition to modest increased height, the Preferred Alternative should eliminate FAR restrictions and other development standards that reduce housing potential.

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COMMENT

RESPONSE

O-47-7 See Common Response 19 Zoning Details.



O-47-8 See Common Response 19 Zoning Details.

As written in our scoping comments, the Preferred Alternative should remove residential FAR limits because they artificially constrain development potential. As an alternative, form-based standards as contemplated in the City’s “Next Right Work” will better facilitate the aesthetically integrated growth that the City hopes to see.

O-47-9 See Common Response 4 Housing Alternatives.

Similarly, other development standards that stifle housing growth should be reexamined and reimagined, and we appreciate the work that the City is already doing and will continue to do to this end. Because “[t]he Action Alternatives would require the development of new or revised zoning and development regulations,” DEIS at 4-18, the Preferred Alternative is the right place to specify that development standards should be updated or eliminated where they are unnecessarily constraining housing. This is consistent with King County Countywide Planning Policy H-13, DEIS at 7-6, and in myriad scoping comments already received, DEIS at Scoping Comment Summary at 8.

For midrise housing in particular, the FEIS Preferred Alternative should study the following development standards to be implemented in MU-M areas, in addition to unlimited residential FAR:

- Eliminate floorplate limits for midrise wood frame construction types up to 85 feet in height;
- Eliminate prescribed upper-level step-backs and setbacks for midrise wood frame construction types up to 85 feet in height;
- Codify green roof and other functional alternatives available to meet impervious surface limits;
- Eliminate the multi-family play area requirements for residential development and replace them with reasonable market-informed residential amenity standards;
- Provide incentives for family sized units;
- Provide incentives for ground-floor active uses, not mandates, within Neighborhood Centers; and
- Eliminate residential parking minimums in frequent transit areas.

IV. Affordable housing programs are important but should remain incentive-based and provide offramps for senior housing.

As the City identifies options to do its part to address the region’s housing affordability crisis and meet its housing supply goals, we must restate our final comment provided during the scoping process. The suggestions above will help provide additional housing supply on sites like ours and should go hand-in-hand with policies that support affordable housing units. Addressing the housing needs of our community is important work, and we

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O-47-10 See Common Response 4 Housing Alternatives.



O-47-9

are pleased to be able to contribute to this as a housing provider in other markets, and hopefully, a future housing provider in Bellevue.

O-47-10

We are deeply concerned with the mandatory inclusionary affordable housing program identified in DEIS Alternative 3. While market-based affordable housing programs are undoubtedly an important tool to create affordable housing, we do not support mandatory programs that carry the risk of stifling development. Instead, in the FEIS Preferred Alternative, the City should continue its focus on incentive-based programs that can meet the same goals without the high risk of shutting down the development pipeline. For housing projects, an incentive program should focus on additional height, not FAR as the City should move to an unlimited FAR model as noted above. Other key elements of any such incentive program that should be included in the FEIS study are: reasonable "base" heights; true incentives to construct bonus heights calibrated to incentivize development generally in addition to affordable housing production; and in-lieu fee alternatives based on the value of the bonus height achieved.

Any such program should also be calibrated to account for the different cost and rent price points of different construction types, and a detailed economic analysis with clear methodology should be included in the FEIS to support the code development. Finally, the incentive program should recognize the challenges of providing typical affordable housing in senior housing projects because of various rent and ownership models, so it should also provide a variety of alternative means of compliance for senior housing.

We appreciate the City's hard work on this critical project and look forward to continued collaboration with you in planning and building an equitable, affordable, and clean City of Bellevue. Again, the Preferred Alternative's Future Land Use Map should identify at least MU-M density on our Site in order to avail the City of an important and ideally placed opportunity for density.

Please do not hesitate to contact me if you have any questions about these comments.

John Hogan
President
Careage Inc.
(253) 377-3160

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O-47

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Image A: Looking North on 156th Ave NE towards seven story multifamily construction within Redmond city limits.



Image B: Chevron service station directly across 156th Ave NE



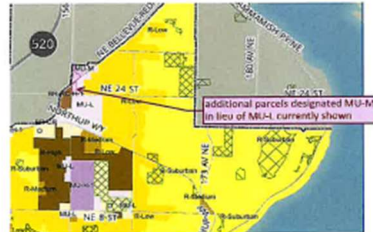
Image C: Shopping center on the southwest corner of NE 24th St & 156th Ave NE



Image D: Bellevue Technology Center (SE corner of NE 24th St & 156th Ave NE)



Vicinity Map & View Key



Suggested revision to Bellevue Comp Plan DEIS Alternative 3

O-48

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RESPONSE

O-48-1 See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for details about the future land use studied around the 120th Light Rail Station / Spring District.

THE SPRING DISTRICT

June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for The Spring District

Dear Director Stead and Mr. Pittman:

This SEPA comment letter is submitted on behalf of WR-SRI 120th LLC on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). WR-SRI is the principal owner and developer of The Spring District that is in the heart of the 120th "Node" in Bel-Red and encompasses the 120th / Spring District light rail station. The District is a catalyst development decades in the making and represents true transit-oriented development with opportunities to live, work, and play. Although the District has been substantially built out under current Bel-Red zoning and our Development Agreement, eight parcels remain as future development sites. In order to ensure the greatest potential for those sites to be developed in the coming years, we support zoning changes to add additional height and density to the District.

We have reviewed the DEIS and provide the following comments that should be incorporated into the Final EIS ("FEIS") analysis:

1. The Preferred Alternative should promote the highest density and height in mixed use centers within a quarter mile of Sound Transit light rail stations, and increased height and density must be added adjacent to the 120th Station.

We are encouraged by the analysis in the DEIS, which reflects a bold vision for the future of Bellevue that recognizes the densifying nature of the city in its mixed-use centers. While we commend the City's effort to update the Comprehensive Plan so that it "looks ahead to the challenges Bellevue needs to address[,]" we feel that Action Alternative 3, which includes "the highest combined amount of future capacity among the three Action Alternatives" does not go far enough to meet this goal with appropriate density in the area surrounding the 120th Station and The Spring District. DEIS at 1-2, 2-27. Alternative 3 identifies The Spring District for a BR-OR-H-2 designation that would allow 25 stories, but this height is insufficient compared to density surrounding other stations. Light rail is a multi-billion dollar taxpayer investment that deserves supportive density that can realize its powerful potential to get people out of their cars and reap the benefits of less congestion and greenhouse gas emissions.

O-48-1

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O-48-2 See Common Response 19 Zoning Details.

O-48-3 See Common Response 4 Housing Alternatives.

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O-48-2

Comparing the density proposed for The Spring District and 120th Station (25 stories) to the density that will be allowed at the other Eastlink stops, it is clear that more density should be granted to achieve parity and support the taxpayer investment. Development surrounding the East Main station is allowed up to 300 feet, development surrounding the Downtown station is allowed up to 600 feet, and development surrounding the Wilburton station is proposed up to 450 feet. In Redmond, the City is similarly discussing height near its Overlake station of 30 stories. Based on these comparisons, it makes sense for The Spring District, already on its way to significant transit-oriented development, to receive additional height and density. Therefore, we request the City modify the BR-OR-H-2 zoning in the Preferred Alternative to allow up to 35 stories (350 feet) of height and supporting density and apply this designation to The Spring District. Allowing this expanded density and height within a quarter mile of Sound Transit light rail at The Spring District will continue to carry out the vision for the 120th Station node set out in the last Comprehensive Plan update to "provide for a mix of office, housing and retail uses, with office as the predominant use." Policy S-BR-87.

2. The City should recalibrate Bel-Red's incentive zoning system instead of adopting affordable housing mandates.

We appreciate the City's head-on approach to addressing affordable housing, beginning with an acknowledgment (and corresponding analysis) that the No Action Alternative will result in significant adverse impacts on affordability. DEIS at 7-44. Affordable housing is one of the critical problems facing Bellevue and our region. However, we are deeply concerned that Alternative 3 identifies a mandatory inclusionary affordable housing program that risks stifling development. We do not support this approach. If not calibrated correctly, such mandatory programs result in no development occurring. That is a much riskier proposition compared to an incentive-based program that would only result in developer choice to build larger or smaller if calibrated incorrectly.

O-48-3

Based on the level of growth Bellevue needs and is planning for in the next two decades, it does not have the luxury of taking a high risk on a mandatory program. Instead, in order to ensure development continues and keeps pace with our needs for growth, the City should study in the Preferred Alternative continuing the current incentive-based system in Bel-Red, but recalibrating it to align with current City priorities - including a significant focus on affordable housing. The current incentive system reflects the City's priorities in 2007 when the zoning code was adopted and not current issues. Through recalibration to focus its tiers first on affordable housing for both residential and office development, along with appropriate in-lieu fee compliance methods, the City can increase the amount of affordable housing provided as a public benefit with development.

Such recalibration combined with other incentives like the Multifamily Housing Tax Exemption will provide powerful tools to create more workforce affordable housing in Bel-Red. This combined potential of incentive system recalibration and MFTE should be studied in the FEIS.

230612 DEIS comment tr.docx

O-48

COMMENT

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THE SPRING DISTRICT |
Draft Environmental Impact Statement Comments
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Page 3

O-48-4 Analyzing the impacts of specific development requirements related to parking is beyond the scope of the FEIS.

O-48-5 See Response to O-48-1 and to O-48-2.

3. The DEIS fails to adequately study the impact of lowering or eliminating minimum parking requirements as mitigation for transportation impacts.

We applaud the DEIS's exploration of "lowering or eliminating minimum parking requirements and reducing the maximum parking requirements" as potential mitigation of transportation system impacts. DEIS at 11-127. We similarly commend the City for striving to "[e]nsure that supply of private parking does not incentivize driving to the point that it degrades the performance of the overall multimodal system." DEIS at 11-125.

The City further acknowledges that "[t]he degree to which these strategies can mitigate traffic congestion impacts depends on the types of strategies and how aggressively they are implemented as well as the context of the impacted area, for example, location, other available mobility options, and magnitude of the impact." DEIS at 11-127. Yet, no specifics are provided on what the City is envisioning for parking changes. For the City to take an affirmative step towards achieving these goals, the contemplated mitigation of lowered or eliminated parking minimums must be further explained in the FEIS, and it should be ultimately adopted in the Preferred Alternative. As a forward-looking document, it is important the Comprehensive Plan reflect and acknowledge multimodal transportation that is central to our region's future.

Conclusion

For more than 15 years WR-SRI has partnered with the City to envision and execute a catalyst transit-oriented neighborhood in The Spring District. We remain committed to the development and believe that future changes aligned with the Comprehensive Plan can only result in a better development if they represent appropriate levels of density. We therefore ask the City to modify the BR-OR-H-2 zoning in the Preferred Alternative and allow 350' of height and supportive density on The Spring District.

We appreciate your hard work and commitment to creating a bold vision for the future of Bellevue, and we look forward to continued engagement in this process.

Sincerely,



Gregory K. Johnson
Authorized Signatory
WR-SRI 120th LLC


230612 DEIS comment 1tr.docx

O-49	COMMENT	RESPONSE
	To whom it may concern:	O-49-1 See Common Response 14 Equity and Environmental Sustainability Metrics.
O-49-1	Hopelink is a nonprofit organization working to end poverty in North and East King County. To support our vision of a community free of poverty, we identify and support the implementation of policies that seek to address the root causes of poverty. Accessing affordable housing and reliable transportation options are both key to maintaining stability and exiting poverty.	O-49-2 Comment noted.
O-49-2	We are writing to express support for Alternative 3 for the comprehensive plan update. We commend your work towards creating a vibrant and inclusive community in Bellevue and we appreciate the opportunity to share our feedback as an organization serving Bellevue and the surrounding area.	O-49-3 See Common Response 4 Housing Alternatives.
O-49-3	As our region continues to grow, it is crucial that we prioritize the development of affordable housing options, especially for families earning less than 80% of the Area Median Income. Access to stable housing is a necessity, and the foundation on which a thriving, equitable city is built. Low-income people are most vulnerable to displacement and homelessness, and ensuring housing is available to those at the lowest income levels should be prioritized.	O-49-4 Comment noted.
O-49-4	Low-income families also face disproportionate transportation burdens, spending a significant portion of their income commuting. Access to reliable and affordable transportation is vital for individuals to access employment, education, healthcare, and other essential services. Hopelink supports policies intended to ensure that mobility and mobility infrastructure are accessible, affordable, convenient, coordinated, reliable, and safe for all. This means supporting all modes of transportation, including public transit, biking, pedestrian, and rolling options. We believe jurisdictions should partner with other stakeholders including transportation providers, residents, businesses, city officials, human services organizations, and community advocates to improve transportation and mobility options.	O-49-5 The Mobility Implementation Plan provides the vision for a complete and connected multimodal network throughout the city.
O-49-5	We want to see a Bellevue where everyone can thrive, regardless of their income. This comprehensive plan update is an opportunity to make a lasting impact and progress toward that goal.	O-49-6 Comment noted.
O-49-6	Thank you again for this opportunity to participate in the comprehensive plan update process.	O-49-7 Comment noted.
O-49-7		

O-50

COMMENT

RESPONSE



bellevuechamber.org
425-454-2464
staff@bellevuechamber.org

Reilly Pittman
Planning Manager
City of Bellevue
Department of Community Development
450 110th Avenue NE
Bellevue, WA 98004
Via Email: compplan2044eis@bellevuewa.gov

Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS
Bellevue Chamber PLUSH Committee Comments

Dear Reilly:

The Bellevue Chamber and PLUSH Committee applaud the City of Bellevue for the projected capacity, building heights, and thoughtful analysis proposed in the DEIS. The alternatives proposed target significant amounts of employment and housing in close proximity to transit, which will serve Bellevue's growth well in the next twenty years. The length of this comment letter should not indicate a poor opinion of the City's work—to the contrary, PLUSH considers this to be a strong document—but as a reflection of the wide range of topics the City is pursuing to improve its ability to handle growth in Bellevue.

PLUSH would like to submit the following comments to the DEIS:

- **We strongly endorse Alternative 3. Alternative 3 best accommodates housing that must be built in Mixed-Use Centers.**
 - Bel-Red, Wilburton, and Downtown accommodate most of Alternative 3's growth. This is true "smart growth" as placing most of Bellevue's growth in Mixed-Use Centers and surrounding transit will minimize traffic impacts by leveraging transit investment in these TOD areas.
 - Taller heights incorporated in Alternative 3 (above 16 floors) allow density to spread out vertically, rather than sprawl horizontally. Higher building heights can translate into more open space and human-scaled ground planes. Taller heights also enable high-rise building typologies to be more feasible economically than height limits between 8-16 stories.
- **General Questions and Comments:**
 - What are the DEIS's "informed build-out" assumptions? How is developable and re-developable land defined? Please provide this in the FEIS to determine that impacts were studied adequately.
 - What are the DEIS's FAR or density assumptions for the alternatives? Please provide these details in the FEIS to help inform our analysis of the impacts that were studied.

O-50-1 See Common Response 4 Housing Alternatives.

O-50-2 See Common Response 5 Assumption of Buildout.

O-50-3 See Common Response 19 Zoning Details.

O-50-1

O-50-2

O-50-3

O-50

COMMENT

RESPONSE

O-50-4	<ul style="list-style-type: none"> o We understand that an economic analysis was included in the study of the affordable housing options, and possibly in the study of the informed build-out assumptions. This economic analysis should be attached as an appendix in the FEIS so that economic assumptions can be publicly reviewed. 	O-50-4	See Common Response 4 Housing Alternatives.
O-50-5	<ul style="list-style-type: none"> o What was the City's methodology/criteria used to designate new land use designations? Particularly with respect to the MU-L and MU-M designations in Neighborhood Centers? We understand the City may not have accounted for frequent transit proximity in identifying these designations. If that is the case, the Preferred Alternative should revisit these designations and identify sites for MU-M if they are within transit proximate areas. 	O-50-5	See DEIS Chapter 2, <i>Alternatives</i> . Designations in Neighborhood Centers were based on the proximity to the current commercial area in the 13 centers, not the proximity to transit.
O-50-6	<ul style="list-style-type: none"> o The property at 12th and 8th, known as Evergreen Court and Glendale is listed at 16 floors in Alternative 2 but only 7-10 floors in Alternative 3. Please state the difference in assumptions and the outcome; is this reduction of height related to affordable housing assumptions? We prefer the higher density on this property in Alternative 2. 	O-50-6	The Preferred Alternative studied in the FEIS includes a future land use designation of RC-M on the site indicated, which is similar to Alternative 3.
	<ul style="list-style-type: none"> • Uses / Mapped Land Use Designations: 		
O-50-7	<ul style="list-style-type: none"> o We recommend studying a more agnostic mix of uses between residential and commercial uses in Mixed-Use Centers in the FEIS. In Mixed-Use Centers, consider allowing residential and commercial generally interchangeably, rather than tightly controlling uses. This will greatly simplify the Land Use Code and drafting of future regulations, and result in a code that is more responsive to market conditions. While we recognize and strongly support housing as a priority, the overall velocity of both commercial and residential projects will increase as flexibility increases. 	O-50-7	See Common Response 19 Zoning Details.
O-50-8	<ul style="list-style-type: none"> o Consider the wide application of a "Mixed-Use" zone in the Mixed-Use Centers. For example, is there a reason to have East Main-focused, Wilburton-focused, Bel-Red-focused, and Eastgate-focused separate land use codes? Utilizing one "Mixed-Use" zone in each of these centers will give the City the ability to more easily and quickly rezone centers. It would also result in permitting efficiency as staff would have fewer zoning designations to apply. 	O-50-8	See Common Response 19 Zoning Details.
O-50-9	<ul style="list-style-type: none"> o Study a less prescriptive approach with Comprehensive Plan map designations. Currently there are 53 different land use designations listed in the Comp Plan cityside (page 653). For example, in Wilburton, rather than including individual designations on each parcel, consider determining the whole area as "Wilburton Mixed Use Center" in the Comp Plan. Consider including a range of implementing zones that can be utilized to implement the Comp Plan map. Similar approaches could be used in Downtown and Bel-Red. Decoupling the Comp Plan/FLUM from the zoning map is allowed by the Growth Management Act and allows flexibility in zoning in the future. 	O-50-9	See Common Response 18 Future Land Use Categories.
O-50-10	<ul style="list-style-type: none"> o Office ("O") zones are not designated for any growth, nor for any ability to have more flexible uses or additional FAR in Alternative 3. We consider this to be a lost opportunity in the 20-year horizon; these 1-2 story office buildings are the buildings that are being hit the hardest by the current office leasing crisis (these buildings are most often older Class B office). This is an opportunity to incentivize development or reuse of underutilized buildings/properties in areas typically close to transit or major arterials. Please study the ability to do all residential / mixed use buildings in the O zones, with heights up to 6 stories, and up to 4 FAR. 	O-50-10	This was not studied in the FEIS under the Preferred Alternative.
O-50-11	<ul style="list-style-type: none"> o Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Bellevue Way corridor may have more transit in the future running locally between Bellevue and Kirkland. As a major arterial, particularly north of Bellevue, there 	O-50-11	Additional housing along transit corridors was considered as part of Alternatives 2 & 3 but was not included in the Preferred Alternative because HB1110 increased allowable density across the city.

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- should be additional density considered in this corridor in the 20-year horizon. Consider the R-High designation or an MU designation along this and other similar corridors.
- We support the creation of a medical / hospital district surrounding Overlake and to the north—consider sufficient densities and heights that will allow MOB and life sciences to develop. Consider allowing some residential, retail, R&D and other supportive uses in this subarea to support hospital workers and those needing to stay longer term for medical treatment; Bellevue currently lacks these housing options near the hospital. Given the current lack of traditional office market, medical office/lab space is more likely to develop in the short term. Consider adding more space to the Wilburton Study Area (north of 12th) that is designated for medical use to allow for these properties to develop in the shorter term.
 - Please study higher densities than currently shown in Alternative 3 in the areas along 520, south of NE 24th, along Northrup Way, and near the border of Redmond's Overlake Urban Center (especially at the intersection of 156th and Bel-Red Road). These areas are currently designated generally MU-L, which would only allow low-rise buildings in a mix of 2-4 stories. BR-GC is also only 1-2 stories. Extend Bel-Red zoning to these areas with the BR-MU-M designation or a similar zone. Again, in the next 20 years it is very likely that the buildings along 520 will need to be redeveloped. More density will also fit better with the future context. For example, on the Redmond side of the of NE 20th and 148th intersection, Redmond is planning for high density/25-story towers. Bellevue should match the height and density that Redmond is planning in Overlake in border areas. These are areas of potential growth that do not impact single-family neighborhoods or lower density zones, and placing growth in these areas could be traded for growth currently designated in neighborhood centers that may also be not well served by transit or create problematic transitions to single family zones.
 - Please study a higher density for OLB zones (OLB and OLB2). It is our understanding that OLB zones will be a part of the Phase 2 code amendments. In Eastgate, a large area of OLB exists along the freeway, up 139th and in the vicinity of 161st. Is there a better designation for this area given its proximity to Bellevue College and its need for housing? Or is it more appropriate to add density to OLB zones and keep this area OLB? Consider a more flexible zone like an MU zone in the Eastgate area.
 - Along 116th south of Downtown, please study a "future vision" for this area rather than designating generally what exists today. This area is close to downtown and is served well by transit near SE 8th. For example, consider whether an LI zone should remain in this area for the next 20 years?
 - Study all center boundaries and ensure parcels are not split zoned (half in centers, half out). For example, on the southwest corner of the downtown boundary, parcels are split zoned downtown and R. This inhibits development in a key corner of downtown along Old Main. Similar conditions may exist in the other centers, particularly in Eastgate. Please review these edge conditions in all Centers and ensure parcels are adjusted to be fully in or out of Centers. Review Centers and determine whether they should be expanded slightly given context.
 - The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management

- O-50-12 The Preferred Alternative includes the study of a mix of residential and office uses in the medical area in the Wilburton TOD Area. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations and a map of the Preferred Alternative.
- O-50-13 Modifications to the Wilburton study area boundary are not part of the scope of this non-project EIS.
- O-50-14 This area is being studied in the FEIS with a designation of MU-M in the preferred alternative. See Draft EEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations. Changing the boundary of the BelRed neighborhood is outside of the scope of this EIS.
- O-50-15 OLB designations are being studied in the Preferred Alternative in the FEIS with densities and uses similar to OLB2. OLB and OLB2 fall under the same future land use designation of OLB in the EIS. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.
- O-50-16 Some of this area was identified as MU-M in the preferred alternative and the additional density was studied in the FEIS. The light industrial (LI) remained the same in all alternatives and the Preferred Alternative. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.
- O-50-17 Thank you for highlighting those Neighborhood Area Plan Policies. See Common Response 4 Housing Alternatives.

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Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS should evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan’s vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS should evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.

O-50-18 As the commenter noted, the EIS studies buildout. See Common Response 5 Assumption of Buildout.

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- **Aesthetic Visual Analysis – Wilburton.** (pages 6-19 through 6-50): We have concerns that the massing model may appear to overstate the density possible in Wilburton. The public could misunderstand what these models represent failing to understand that the EIS needs to show 100% re-developable build out to show a “highest-growth case scenario.” Understandably, the massing doesn’t reflect existing property configurations and shows built form on unbuildable wetlands, the existing substation, and does not leave space for planned city parks and the planned bridge for the Grand Connection, all of which would reduce the extent of built form. The City should also develop more realistic propensity diagrams that take into consideration these real-world conditions so that the public has more accurate information to gauge impacts. We feel the EIS should also include additional written explanation to accompany the current diagrams. We suggest inserting the following:

O-50-19 See Common Response 19 Zoning Details.

O-50-20 See Common Response 16 Critical Areas.

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Please note these massing diagrams represent 100% development capacity expressed as built form for each alternative. Many property and land-use determinants that would reduce buildable areas were not considered when creating these diagrams. There is no real estate development precedent to support 100% build out as shown in the next 25 years.

- We also caution the City against increasing transition zones in the Mixed-Use Centers. In a City, fewer step-down transitions are expected. Transition zones are better suited adjacent to single-family zones, and the City should consider whether the reduction in density currently deployed by transition zones is an effective approach to “mitigate aesthetics” or whether it simply stops redevelopment from occurring.
- The mitigation related to viewsheds should be tightly defined and controlled. Private views are not protected by SEPA, and any public views to be protected should be very specifically defined.
- We are concerned about mitigation related to “Aesthetic Impacts” that will further reduce the efficient creation of density. We strongly suggest that such mitigation measures be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85’ should be allowed larger floor plates, and residential towers above 85’ should be sized such that residential units can be delivered more efficiently (upper-level setbacks add cost to structures). The City should not look to current upper-level tower limits, but instead, look to the market to inform the most efficient forms to avoid adding unnecessary cost to projects. Inserting a cost/benefit analysis of potential mitigation measures may assist decision-makers. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation.

O-50-20

- **Critical Areas/Stormwater/Trees.** The City should analyze impacts to critical areas; the current 4-page memorandum in the Appendix is insufficient. The City should study implementation of the following:
 - Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made

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O-50-20	steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue and does not reflect best available science.	O-50-21 See Response to O-15-20.
O-50-21	<ul style="list-style-type: none"> The "critical areas penalty" should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review. 	O-50-22 See Common Response 19 Zoning Details.
O-50-22	<ul style="list-style-type: none"> The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20-or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decision makers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City's current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue. The City must also recognize that areas of Sturtevant Creek in Wilburton are on WSDOT property within the "limited access area" that is highly regulated by FHWA and no daylighting or additional mitigation may be possible in these areas. The City should account for this in the regulatory context section of the FEIS. 	O-50-23 See Common Response 16, Critical Areas.
O-50-23	<ul style="list-style-type: none"> The FEIS should study the loss of housing units and consequently affordable housing if the current critical areas requirements remain; these impacts should be disclosed to decision-makers. The FEIS should study the use of Mitigation Banking. The FEIS should study alternate stream designations such as the "Urban Stream" designation used by the City of Woodinville, these designations recognize that even a salmon-bearing stream can be properly protected in an urban area without large 100-foot buffers, and that it may actually be positive for stream function to incentivize improvement of current stream function. 	O-50-24 See Common Response 16 Critical Areas.
O-50-24	<ul style="list-style-type: none"> The FEIS should study properties in Bel-Red and Wilburton that are most impacted by critical areas and determine whether redevelopment will be possible given current critical area requirements. The FEIS should study alternate forms of mitigation and ways in which the sites most impacted could still re-develop. If the critical area requirements are so onerous so as to prevent any re-development from occurring, then the critical area will never realize any improvement, which is exactly the opposite of the intent of the critical area requirements. 	O-50-25 See Common Response 2 Tree Canopy. The FEIS includes a tree canopy technical report (FEIS Appendix M). However, analysis of specific city regulations in the Land Use Code that regulate tree removal in the city is outside the scope of this EIS process.
O-50-25	<ul style="list-style-type: none"> Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the Comprehensive Plan and subsequent LUCA amendments are in place. The City should complete a supplemental FEIS analysis on tree impacts following Comprehensive Plan implementation and disclose how any tree ordinance could impact the density assumed in the FEIS. All Mixed-Use Centers should be exempt like downtown is exempt. 	

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O-50-26	<ul style="list-style-type: none"> o Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton or Mixed-Use Center regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly. 	O-50-26 Analysis of development regulations that address impervious surfaces is outside of the scope of the FEIS.
	<ul style="list-style-type: none"> • Housing Affordability 	O-50-27 See Common Response 4 Housing Alternatives.
O-50-27	<ul style="list-style-type: none"> o Any approach to affordable housing must be legal. Affordable housing requirements cannot exceed the impacts created by new development, and must meet the requirement of WAC 365-196-870, that increased density can be achieved given the affordable housing requirements and other development regulation constraints. 	O-50-28 See Common Response 4 Housing Alternatives.
O-50-28	<ul style="list-style-type: none"> o The City should also consider itself as an essential partner in the housing affordability issue. Rather than focusing solely on market-rate developer-created funding or housing, which is generally limited to 80% AMI and above, the City should explore and disclose in the FEIS the many tools it may deploy to address housing affordability, such as a housing levy, housing vouchers, impact fee waivers for market-rate units that have performed inclusionary housing at a lower AMI, parking reductions, expanded MFTE, expedited land-use and building permits, financing programs and resources, making underutilized or surplus public properties available, raising SEPA thresholds, etc. and other ideas. WAC 365-196-870 requires the City to review and apply these incentives. 	O-50-29 The FEIS includes analysis of the Preferred Alternative. The FEIS includes an analysis of a mandatory and incentive approach to affordable housing irrespective of the alternative.
O-50-29	<ul style="list-style-type: none"> o The FEIS should include each affordability program applied to each alternative to show decision makers the relative efficiency of each program. There is no housing production data associated with the different programs or alternatives, please provide this data in the FEIS. 	O-50-30 See Response to O-50-28.
O-50-30	<ul style="list-style-type: none"> o The FEIS should recognize that inclusionary zoning housing policies need a sustained level of market-rate development in the local market or IZ policies will not generate a meaningful number of new affordable housing units. In most cases, jurisdictions provide development incentives to ensure the feasibility of development projects affected by an IZ policy. The principal incentives are direct subsidies, density bonuses, tax abatements (MFTE), and reduced parking requirements. Individually, and especially in combination, these incentives can substantially enhance the feasibility of development projects affected by an IZ policy. 	O-50-31 See Response to O-50-28.
O-50-31	<ul style="list-style-type: none"> o The FEIS should disclose the option of a fee in lieu of developing IZ units, and the city can use those collected fees to support construction for lower-income households directly. Setting the in-lieu payment amount affects IZ outcomes. If the payment amount is set high, developers may not be able to feasibly support the in-lieu payments and will either be able to deliver the below-market units within a project or not build at all. Further, the fee needs to be context-oriented and calibrated with the bonus received to yield better results for both developers and policymakers such as considering market prices, development types, and macroeconomic conditions. 	O-50-32 Comment noted. O-50-33 Comment noted.
O-50-32	<ul style="list-style-type: none"> o To the extent that land use requirements and/or fee arrangements impact the building envelope or constructability of buildings, the city should conduct a more cumulative analysis of the effects. For example, land use incentives for affordable housing and childcare facilities must be considered concurrently to ensure they can complement each other. 	
O-50-33	<ul style="list-style-type: none"> o Affordable housing is just one "spoke" of the livable City wheel. Other needs that are often obtained via development projects include park dedications/fees, deep green development, trails, sidewalks and street furnishings, roads/road dedications, daycare, community facilities, and stream restoration. Depending on the extent of the affordability program, disclose in the 	

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FEIS via an economic analysis the ability of a project to “do it all” — most projects cannot do it all, and will not develop if regulations are collectively too onerous.

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• **State Legislation Analysis / General SEPA**

- SB 5412. This state law requires jurisdictions to exempt from SEPA review all projects that include one or more housing unit. Please include the required analysis according to the new RCW 43.21C.229(2)(d) such that Bellevue can comply with the state law and allow for streamlined permitting of residential units following adoption of development standards.
- HB 1293. This state law requires jurisdictions to apply only “clear and objective development regulations governing the exterior design of new development” and limits design review application to only the exterior of buildings, not interior uses. Design regulations also may not result in a reduction in density, height, bulk, or scale below the applicable development regulations for the zone. Compliance with this state law is required within 6 months of the adoption of the Bellevue 2044 Comprehensive Plan. Please incorporate analysis of this state law within the Preferred Alternative as it relates to the adoption of Wilburton Design Guidelines (p. 6-63), as well as mention of the new state law regarding all other applicable design guidelines and how these must be augmented to meet the requirements.
- SB 5290. This state law requires consolidated permit timelines. The City should include study of the following items that would significantly streamline permit timelines:

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- Define SEPA thresholds for changes of use / procedures for change of use more clearly and increase SEPA thresholds generally for commercial uses.
- Eliminate parking requirements for changes of use; allow existing nonconformities to continue; this will allow for the more flexible use of existing spaces.
- Allow an administrative land use exemption process to modify issued MDPs between uses; this will allow for a better reuse/adoption of existing MDPs in an era when permitted office spaces may not be built.
- Standardize the permit review process for both land use and technical (building, utility, shoring) permits; currently many different permits are reviewed in different ways with corrections being emailed rather than stored on the permit system. Study ways to make the clear and grade permit process happen more smoothly and more predictably.
- In general, the FEIS should include a basic statement about what the FEIS mitigation suggestions are, and what they are not. Under SEPA, impacts of the proposed action have already been determined to be significant. SEPA does not require impacts to be mitigated to a level of non-significance as part of the FEIS process. As such, mitigating measures are suggestions only, and are not required by SEPA. Decision-makers and the public should be made aware of this distinction.
- As of January 2023, parking is no longer an element of the environment required to be reviewed by SEPA. The FEIS should recognize the connection between car usage and free ample parking (free parking promotes car usage) and should continue to discuss parking policy in the context of transportation mitigation.

• **Transportation**

- For Wilburton, we believe SE 6th should be extended only to 116th, not to 120th. The DEIS shows that there is almost no difference between the traffic impacts of Alternative 3 and 3A, and that traffic may be a bit worse for the extension option. In addition, the impacts to Eastrail of another crossing are not acceptable.

O-50-34 The city is familiar with SB 5412, and the criteria that must be met to qualify for the new SEPA categorical exemption. Consistent with this criteria, the city may incorporate some of the environmental analysis and proposed mitigation measures included in the EIS into its policies, codes, standards, and regulations. Bellevue will comply with the state law and allow for streamlined permitting of residential units following adoption of development standards.

O-50-35 The design guidelines noted on DEIS p. 6-63 are a mitigation measure the city could take. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

O-50-36 See Common Response 19 Zoning Details.

O-50-37 See Common Response 22 Mitigation Measures Required.

O-50-38 The Determination of Significance was issued on September 29, 2022. The FEIS complies with all the requirements for an EIS as of that date.

O-50-39 Comment noted.

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- o Prioritize the Grand Connection's connector bridge as an essential public investment in a broader range of mobility choices. The usefulness of the Eastrail system is contingent on this link to downtown. This connection should be a top priority in city funding; SB 5452 has been passed allowing pedestrian and bicycle improvements to be paid for by transportation impact fees. Further, consider the use of zoning incentives in the bonus amenity program for adjacent sites to respond.
- o Figure 11-28 shows a street grid in Wilburton. Just as in Bel-Red, we have significant concerns about a road grid that does not reflect property boundaries or the City's ability to effectively deliver the road grid in an efficient manner. The City should study whether a built out road grid in Wilburton would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is actually necessary from a transportation standpoint. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.

O-50-40 Outside of the Comprehensive Plan Periodic Update process and the selection of a Preferred Alternative, the city will soon commence to prepare preliminary design for a new bridge for pedestrians and bicyclists over I-405 between the Downtown light rail station and Eastrail. Following the selection of a preferred alternative, Comprehensive Plan policy amendments will describe the vision and implementation, and potential future amendments to the text of the Land Use Code, if adopted, would provide regulatory requirements.

O-50-41

- o It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. The Chamber supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
- o We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
- o Similarly, in Bel-Red, we believe that the existing "required" road grid should be studied and reconsidered. It does not appear that completion of the road grid is a component of the transportation analysis. In general, it has been exceedingly difficult to obtain a road grid in Bel-Red, again due to the fact that the proposed road grid had no regard for property boundaries or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.

O-50-41 See Common Response 10 Wilburton Street Grid. FEIS Chapter 11, *Transportation*, contains additional qualitative analysis of proposed internal access and mobility within the Wilburton study area.

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O-50-42 See Common Response 17 BelRed Street Grid.

O-50-43

- **Mitigation**
 - o **Commercial displacement.** Requiring displaced businesses be given a "right to return" or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement and sign permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City's idea of an "MFTE" program for small business locations is a creative idea that could result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS such that decision-makers can truly weigh and balance the relative benefits of such mitigation measures.

O-50-43 The EIS discloses potential environmental impacts associated with the growth alternatives. It includes and identifies measures that can be taken to mitigate those impacts. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

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o **Noise.** Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in large swaths of the City. The impact of such mitigation measures should be studied and disclosed in the EIS. As an alternative, we suggest raising the dBA to make Bellevue consistent with other cities that have high-rise buildings near these arterials. Seattle is one example of this.

O-50-44 See Common Response 6 Noise regarding the regulatory framework for noise levels.

O-50-45

o **"Air quality buffers".** The DEIS suggests air quality "buffers" for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would seem that this mitigation is better placed in the "environmental health" section, as the DEIS identifies freeways as an environmental health hazard. Based on Wilburton's location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City's key transit corridors, so the implementation of such buffers would completely undermine the City's urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. The City has identified a significant impact without an applicable threshold and without taking into consideration the impact of transportation mitigation measures on GHG emissions. This analysis is flawed and must be updated in the FEIS. Further, the City's 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton, Bel-Red, Factoria, and Eastgate would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The FEIS should eliminate this recommendation.

O-50-45 See Common Response 8 Air Quality/GHG.

O-50-46 See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.

O-50-47 See Common Response 19 Zoning Details.

O-50-46

• **Greenhouse Gas Emissions.** The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will soon shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the FEIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code. This should be done while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure. Incentives to incorporating district energy systems should be explored in zoning codes and in the FEIS.

Since building form and bulk controls influence multiple chapters in the DEIS, the Chamber recommends the following adjustments to LUCA development standards be considered in parallel with the Comp Plan Update and studied in the FEIS as much as possible. Many of the standards addressed below are currently barriers to housing production and positive economic development.

O-50-47

1. **Plan BelRed and Wilburton Concurrently.** Continue to simultaneously plan for Wilburton and BelRed as both areas are concurrently responding to the light rail investment and both areas have tremendous redevelopment propensity. As you shape the LUCA amendments, we urge you to update these areas with common development standards and incentive programs. These neighborhoods can and will evolve as distinct districts and subdistricts, but the approach to land-use and zoning controls should have the same underpinnings. This amendment process is a great opportunity to make the

O-50

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code more consistent, concise, approachable for the public and more workable for the city staff and the real estate development community.

O-50-48 See Common Response 18 Future Land Use Categories.

O-50-48

2. **Revisit the 53 land use designations in the DEIS.** We suggest reducing these in number and making them more "use-agnostic" as mixed-use zones. Redmond is currently doing this in Overlake.

O-50-49 Retention of Light Industrial (LI) uses is included in the Preferred Alternative and has been studied in the FEIS.

O-50-49

3. **Industrial Uses.** Consider eliminating future Industrial/Manufacturing uses in Bel-Red and Wilburton that create pollution, noise, or dust. These uses are incompatible with livable TOD neighborhoods at high-capacity light rail stations. Compatible light industrial uses could be a conditional use in certain perimeter locations while current industrial/manufacturing uses would remain until those properties redevelop. The existing use framework in Bel-Red has proven fair, and it should be retained and could be expanded to Wilburton.

O-50-50 See Common Response 19 Zoning Details.

O-50-50

4. **Floor Area Ratio.** Traditional floor area ratios do not translate well in Bel-Red/Wilburton due to a concentration of both extremely large and small parcels, critical areas, and lack of a street grid.
 a. Eliminate Residential FAR. We believe residential development is better managed and ultimately encouraged by just using bulk controls (height, floor plate, setbacks, tower separation, etc.) and administrative design review rather than setting FAR limits. Some of Seattle's SM-SLU and downtown codes use this methodology. Base/minimum FAR can still be used for calculating incentive programs, or the City could use a height model for incentives, like Downtown.
 b. Commercial FARs should remain but be increased from current limits to utilize increased heights and floor plate limits. Specifically, commercial FARs should be increased within a quarter mile around all light rail stations. A balance of jobs and housing around all stations is key to create a vibrant station area, provide both daytime (office worker) and evening (residents) to support local retail, and to maximize the transit benefits and reduce vehicular traffic.

O-50-51 See Common Response 19 Zoning Details.

O-50-52 See Common Response 19 Zoning Details.

O-50-51

5. **Height Limits.** We applaud the bold heights proposed in the DEIS alternatives.
 a. Exclude elevator/mechanical screens/stair overruns/solar panels/railings/parapets from floor/height limits and provide adequate additional heights or provisions for these important features. As energy codes evolve, even more height is needed to accommodate rooftop mechanical equipment and we encourage the City to be flexible rather than prescriptive with these standards.
 b. Work with the building official and fire department to consider allowing "6 over 2" construction (6 levels of Type III-A wood frame over 2 levels of Type I-A concrete). This is allowed in Seattle and is a very popular and more feasible way of building rather than 5 over 3 construction.

O-50-52

6. **Floor Plate Limits:**
 a. Commercial
 i. No floor plate limit under 85' tall
 ii. Increase maximum floor plates on buildings between 85' and 180' tall to 50,000 SF to attract more national/international tech, medical and life science users.
 iii. Heights over 180' – 24,000 SF Floor plate.
 b. Residential - Size by typology to allow efficiency and better feasibility as follows:
 i. Midrise to 85' Unlimited

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O-50-52

- ii. Highrise 85' to 180': 20,000 SF
- iii. Highrise above 180': 12,000 SF
- c. Allow averaging of floorplates above and below the sizes listed above.
- d. Create new design guidelines and administrative design review for modulation, articulation, top expression, etc.

O-50-53 See Common Response 19 Zoning Details.

O-50-53

7. **Upper-Level Setbacks and Step Backs.** Eliminate this standard for midrise and make it only a design guideline for tower buildings over 85' tall. This would enable better feasibility and more housing production. Step backs force large, inefficient units that do not stack, which can prevent projects from pursuing MFTE. Using design guidelines to allow flexibility and case by case/ site specific/ context/ affordability/ materials/ modulation issues can be considered. Also, when the setback is required for towers, raise the podium transition height from 40' to 48' so taller floor heights can be achieved in a 3-story commercial or 4 story residential podium with higher retail ceilings at the ground level.

O-50-54 See Common Response 19 Zoning Details.

O-50-55 See Common Response 19 Zoning Details.

O-50-54

8. **Parking:**
- a. Ratios: Reduce or eliminate minimums. The market will provide parking as necessary and affordable housing projects near high-capacity transit and unusual shaped properties can respond appropriately. We support the DEIS's page 74 statement on parking that *"...Bellevue should focus on...parking code reforms to eliminate parking minimums near Link light rail stations, and potentially odd further maximum parking limits..."*
 - b. Compact parking: Allow at least 50% of stalls to be compact, and up to 65% in Mixed Use Centers.
 - c. Allow additional flexibility (height, locations, exemption from FAR, exposure to public ROW) for above-grade parking where critical areas and high-water table are key development determinants.
 - d. Do not require additional parking requirements for changes of use; this will allow existing spaces to be re-tenanted more easily.

O-50-56 See Common Response 16 Critical Areas.

O-50-55

9. **Build to Lines.** Eliminate this requirement. We feel this is an outdated suburban planning tool that has historically been used to keep surface parking out of streetscapes. This is no longer necessary as new projects consistently create urban street wall conditions as they generally need every square foot of land to make projects feasible. Also, plazas and public open spaces are incentivized and encouraged, but the built to line standard requires granting a departure.

O-50-56

10. **Critical Areas, Manmade Slopes, Grading and Streams:**
- a. Exempt all man-made slopes/grading from critical area setbacks. Allow for historic/natural grades to set criteria for critical area mapping and steep slope setbacks.
 - b. Reduce setbacks from manmade stream channelization or consider flexibility where streams have been altered.
 - c. Allow creative habitat and ecological solutions to be explored as an alternative to a linear setback.
 - d. Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
 - e. Alternate stream designations, such as the "Urban Stream" designation used by Woodinville should be adopted.

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O-50-56

f. Approve the use of mitigation banks in lieu of critical area setbacks. For example, The Keller Farm mitigation bank is already approved for the Lake Washington watershed (approved by Corps, Ecology, WDFW, EPA and Muckleshoot Tribe).

O-50-57 See Common Response 6 Noise regarding the regulatory framework for noise levels.

O-50-57

11. **Noise Ordinance.** Revisit the thresholds in the noise ordinance to better accommodate urban conditions.

O-50-58 See Common Response 19 Zoning Details.

O-50-58

12. **Lot Coverage & Impervious Surface Limits.** Allow 100% coverage in all Mixed-Use Centers and areas considered to be more urban zones, which is typical in dense, urban, and transit-rich areas. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.

O-50-59 See Common Response 19 Zoning Details.

O-50-59

13. **Landscape Buffers.** Elimination of the 10' landscape buffer on interior lot lines. Building codes and fire separation will determine setbacks from lot lines and in most cases, assure setbacks if window openings are provided. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.

O-50-60 See Common Response 19 Zoning Details.

O-50-60

14. **Multifamily Play Areas.** Current standards are too onerous. The market already demands/provides amenity space. Also, public investment in our parks system (including park impact fees) should be taking care of play equipment. We feel the public would rather have larger, high-quality playgrounds shared by all versus dozens of segregated, privatized ones that are mediocre.

O-50-61 See Common Response 4, Housing Alternatives for how affordable housing incentives were studied in the EIS. See Common Response 19 Zoning Details.

O-50-61

15. **Bonus Amenity Incentives.** Beyond the current lists, consider including the following as Tier 1 Priorities:

- a. Larger, family-sized units (2 & 3 bedroom)
- b. Affordable and mid-market housing at 80-120%
- c. Daycare/early learning centers
- d. Green building/LEED/Passive House/Living Building Challenge / Salmon Safe
- e. Enhancement, construction, public amenities, and active retail adjacent to the Grand Connection Bridge and Eastrail bike/ped network.
- f. Construction of missing street grid (see below)
- g. Allowing large properties to allocate a portion of the site to a non-profit development partner for a standalone affordable building and to receive credit for the affordable housing bonus as "on site" or "inclusionary" for the whole property.

O-50-62 See Common Response 17 BelRed Street Grid.

O-50-62

16. **Street Grid Challenges.** Revisit the aspirational 660' square street grid in Bel-Red, which is based on the historic 1785 BLM Township and Range land divisions.

- a. Consider the realities of topography (e.g., streets can follow contour lines rather than go off a cliff).
- b. Look for ways the city can fund construction, better incentivize, or facilitate achieving this with multiple landowners to complete street segments already started.
- c. Continue to include these easement areas as the FAR property basis. Flexibility and public funding may be needed to create useful and complete rights-of-way.
- d. For unconnected spur streets - focus on creating interim uses rather than requiring full build out until adjacent properties can also respond. These include pedestrian connections, bike paths, shared or private fire access lanes on permeable paving and community uses such as playgrounds or pea patches.

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O-50-63

e. Ensure that these challenges are also addressed in the Wilburton "street grid."

O-50-63 See Common Response 10 Wilburton Street Grid.

O-50-64

17. Administrative Flexibility. In Mixed Use Center and Neighborhood Center zones, allow administrative design review departures from all standards aside from height and commercial FAR to ensure projects can best respond to their unique site conditions.

O-50-64 See Common Response 19 Zoning Details.

18. Large Property Flexibility & Discretion:

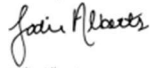
- a. Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and support an 18-hour neighborhood.
- b. Study allowing more flexibility and discretion in the application of key development standards for large properties with multi-building/multi-phase development with development agreements. These include:
 - i. Height averaging for towers to allow for a sense of building hierarchy, to better manage shadowing/neighbor impacts and to create an interesting skyline profile.
 - ii. Dedication of a portion of the site to a dedicated affordable building that would meet the entire properties requirement for onsite inclusionary housing.
 - iii. Open space consolidation with partial completion by phase.
 - iv. Allowance of "alleys with addresses" in areas of the City other than downtown that allow private roads to function as alleys that still access public roads. Introduce the new concept of a service alley that can consolidate back of house activities away from public and private streets and pedestrian activities, which will benefit the public realm and transportation system. Such service alleys would not have pedestrian facilities.

O-50-65 See Common Response 19 Zoning Details.

O-50-65

Thank you for the opportunity to comment on the City of Bellevue's DEIS. The Chamber and PLUSH look forward to continuing this important work alongside City staff, the Planning Commission, and City Council.

Sincerely,



Jodie Alberts
Vice President, Government Affairs



Jessica Clawson
PLUSH Committee Chair

O-51

COMMENT

RESPONSE

O-51-1 See Common Response 13 Growth Targets.



June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update DEIS Comments
 c/o Thara Johnson, Comprehensive Planning Manager
 City of Bellevue
 450 110th Avenue NE
 Bellevue, WA 98004

Via electronic mail: CompPlan2044EIS@bellevuewa.gov

Re: Amazon comments on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Johnson,

On behalf of Amazon, thank you for the opportunity to comment on the City of Bellevue's 2023 Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. We applaud city staff on their work to deliver a thorough draft analysis. We also appreciate the City of Bellevue's public engagement, including direct engagement with the business community as stakeholders.

As a major employer that is growing in Bellevue, we support the city's effort to chart a bold vision for how Bellevue should grow, locate housing and jobs, and make investments in transportation, utilities, and parks in the next twenty years. Amazon is committed to partnering with the City of Bellevue and the community on this important planning effort.

Amazon first opened an office in Bellevue in 2017 and we had about 450 employees in the city at the time. As customer demand increased through the years, we continued to hire and grow in the Puget Sound region. In 2019, we announced plans to invest much more on the Eastside—bringing 25,000 jobs, and making Bellevue and the Eastside the location of our future growth in the Puget Sound region.

Building off of our EIS Scoping letter submitted on October 31, 2022 where we emphasized the importance of striking balance between job growth and housing stock, we highlighted three areas for consideration:

- Study 80,000 housing units and 30,000 job capacity above the No Action Alternative
- Prioritize density around frequent and reliable transit
- Study multimodal solutions as mitigation of growth and dense, mixed-use development

We thank the Bellevue 2044 team for taking our comments into consideration in the draft analysis. Specifically, we see our inputs reflected in Alternative 3 where housing capacity increased from initially 65,000-70,000 housing units to 95,000 housing units and jobs capacity increase from 145,000 jobs to

2121 7th Avenue
 Seattle, WA 98121

O-51-2 Comment noted.

O-51-1

O-51-2

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O-51-3

200,000 jobs. Additionally, we see our comment to prioritize density around frequent and reliable transit and increase height and density in BelRed and Wilburton reflected in Alternative 3 where additional height and density was studied. Last, we support the city's use of a multimodal transportation analysis, based on the Mobility Implementation Plan (MIP) adopted by City Council in 2022, to evaluate various growth alternatives within the DEIS.

O-51-3 Comment noted.

O-51-4 See Common Response 4 Housing Alternatives.

O-51-5 See Common Response 4 Housing Alternatives.

Consistent with those priority themes shared in our initial comment letter, Amazon offers the following comments for consideration for the final Environment Impact Statement (FEIS) and selection of the preferred alternative:

O-51-4

- **Alternative 3 Best Reflects Bellevue's Needs:** Upon review of the three Action Alternatives, we believe Alternative 3 allows for the diversity and density of housing and job growth that best reflect Bellevue's needs. Alternative 3 also focuses growth in BelRed, Wilburton, and Downtown, where there are existing and planned transit investments to encourage transit-oriented development. We also support the taller heights in Alternative 3 to allow for more flexibility for housing and better feasibility for high-rise building typologies.

O-51-6 See Common Response 18 Future Land Use Categories.

O-51-5

- **Connection between Alternatives and Affordable Housing Programs:** We suggest the city clarify in the FEIS why each Action Alternative is paired with different affordable housing programs such as incentive zoning versus mandatory inclusionary affordable housing and whether they can be decoupled. Additionally, it would be instructive to study how various affordable housing programs and calibrations of those programs might yield different outputs in each of the Action Alternatives. We suggest the city show, in the FEIS, analysis that compares estimated market-rate and affordable housing unit output, broken down by area median income (AMI) affordability levels, for each of the Action Alternatives. The analysis should compare the different affordable housing policy tools that are being considered, including but not limited to incentive zoning, mandatory inclusionary (with and without fee-in-lieu and deed-in-lieu options), and MFTE. The analysis should account for how these different policy tools, such as incentive and mandatory inclusionary zoning, affects overall residential development decisions. The analysis should also take into consideration the role of other non-land use related affordable housing funding and financing tools such as the Washington State Housing Trust Fund and the federal Low Income Housing Tax Credit. This level of analysis would help the city select affordable housing policy approaches informed by data and modeling.

O-51-7 See Common Response 13 Growth Targets.

O-51-6

- **Simplify Land Use Designations:** The current maps show 53 land-use designations which is quite complicated. We suggest finding ways to consolidate them into more flexible 'mixed use' zones.

O-51-7

- **Reflect Phased Buildout Over 25 Years:** For baseline comparison, it would be informative to show in the FEIS previous pace of growth in Bellevue. For example, show the percentage of developable land that was redeveloped within the last 25 years. The city can apply that baseline to the alternatives to provide a data-informed, more realistic view on how each of the alternatives could potentially meet, not meet, or exceed the King County Growth Targets of 35,000 housing and 70,000 jobs over a 25-year span in Bellevue. In part, Amazon supports Alternative 3 because we understand that capacity does not necessarily result in development. Alternative 3 provides ample capacity, and therefore flexibility, to help the city accommodate the expected growth and achieve a more favorable housing to jobs ratio. Based on Figure 2-10 on page 2-32, in order to meet or exceed the 35,000-housing target, 59% of all developable residential capacity would need to be built in Alternative 1, 45% in Alternative 2, and most realistically, 37% in Alternative 3. The FEIS should reflect phased build out based on historic development data so that decision-makers and the public can use that information

O-51

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O-51-7	<p>to select a Preferred Alternative. On the contrary, the aesthetic visual analysis for Wilburton (pages 6-19 to 6-50) show a 100% buildout without distinction from undevelopable sites such as parks or wetlands. Without a disclaimer or clarification, we are concerned that the massing images shown will cause confusion and alarm.</p>
O-51-8	<ul style="list-style-type: none"> • Study Barriers to Fully Achieve Housing Capacity: While we understand the primary requirements of an EIS is to identify growth target distribution approaches and evaluate the impacts of growth distribution, we believe there are gaps between zoning capacity studied in the EIS and what might actually get built after factoring in floor-to-area (FAR) ratios and development standards. Alternative 3 allows for 95,000 housing units but the DEIS does not specify FAR assumptions for any alternative which could dramatically alter actual unit output and development feasibility. It would be helpful for the city to clarify FAR assumptions used for modeling. The city should also analyze other potential barriers to fully achieving the housing capacity numbers, including development standards and parking requirements. For example, if zoning allows for residential development to achieve a certain height, other factors such as landscape buffers or setbacks may render it less feasible to fully achieve or max out on the development capacity. It would be helpful to understand how those factors might impact the city's ability to realistically meet housing targets.
O-51-9	<ul style="list-style-type: none"> • Catalog Publicly-Owned Surplus Land Suitable for Affordable Housing Near Transit: Through Amazon's Housing Equity Fund, we have invested \$514 million in loans and grants in the Puget Sound region to create and preserve 5,200 affordable homes for families making between 30% and 80% of Area Median Income (AMI). In Bellevue, we have increased the restricted affordable housing stock by approximately 20% as of August 2022 and continue to increase that number by supporting 233 new affordable housing units near Bellevue's 120th Street light rail station. Through our experience over the past few years, we have noted that increasing land costs presents further challenges to bringing more affordable housing online. It would be prudent for the city to identify publicly-owned land that is underutilized or surplus, particularly in Mixed-Use or Neighborhood Centers, and designate them as potential sites for affordable housing.
O-51-10	<ul style="list-style-type: none"> • Bolster Mitigation Measures under Transportation: We believe the stated Avoidance, Minimization, and Mitigation Measures in Section 11.6 is a good starting place to reduce the significance of the adverse impacts identified in the Action Alternatives. However, while we support building out pedestrian and bicycle network per the city's Mobility Implementation Plan, we encourage the city to consider additional vehicle and road-focused solutions to mitigate impacts on System Intersection V/C ratios, Primary Vehicle Corridor speed, and state facility LOS. For example, page 11-132 states, "vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps." It would be helpful to clarify what those potential vehicle capacity expansions could be and how it might mitigate the adverse impacts.
O-51-11	<ul style="list-style-type: none"> • Add Mention of the Grand Connection I-405 Non-Motorized Crossing Throughout the Transportation Chapter: Given the City of Bellevue issued a Request for Qualifications for consulting firms to conduct preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing in April this year, the DEIS should include mention of the project in the Transportation section. This includes, but is not limited to, the following references: <ul style="list-style-type: none"> ○ In section 11.4. Regulatory Context, add mention of the I-405 non-motorized crossing within the list of 'Relevant Plans and Policies'.

O-51-8	<p>The development estimates in the EIS are conservative to ensure the analysis takes into account the environmental impacts associated with maximum buildout. As noted, regulations in the Land Use Code may limit future development in a more nuanced way; however, such site-specific analysis is outside of the scope of this EIS.</p>
O-51-9	<p>Bellevue's adopted Affordable Housing Strategy (AHS) includes five strategies and 21 actions to increase the availability and access to affordable housing. Action C-2 focuses on opportunities to work in partnership with various agencies to develop affordable housing on suitable surplus public lands near transit hubs. Implementation of this action is ongoing.</p>
O-51-10	<p>The EIS is primarily a document to disclose potential environmental impacts of the city's non-project action, and the EIS identifies potential mitigation for the environmental impacts identified. The city may choose to implement some, all, or none of these measures in the update to the Comprehensive Plan. It is also possible for the city to take other actions to reduce the impacts of the action.</p>
O-51-11	<p>Analysis of specific transportation projects is outside of the scope of the EIS.</p>

O-51

COMMENT

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- O-51-12
 - Clarify on page 11-43, under I-405 Corridor Program, whether the I-405 non-motorized crossing is counted as one of eight new pedestrian and bicycle crossings over I-405 referenced in that section.
 - In Mitigation Measures M-TR-1, 2, and 3, reference Eastrail and I-405 non-motorized crossing as key strategies to expand pedestrian and bicycle network.
 - Under Section 11.5.1, clarify if the Grand Connection I-405 non-motorized crossing between City Hall and Eastrail is assumed to be in place in at least one of the Action Alternatives. Also clarify whether in Alternatives 1-3 in the same section, which specific non-multimodal connections in the Wilburton study area were included in the system performance modeling.
- O-51-13
 - **NE 6th Street Extension in the Wilburton Study Area:** Under Alternative 3A in the Wilburton Study Area (page 11-110), we agree with the city's analysis that a NE 6th Street extension to 120th Ave NE with an at-grade intersection at 116th Ave NE and Eastrail would greatly impact the experience for Eastrail users by adding another trail crossing and new modal conflict. We support a NE 6th Street extension to 116th Ave NE for local East-West access, not limited to HOV access to I-405.
 - **Incentivize Trail-Oriented Development along Eastrail and Grand Connection I-405 Crossing:** As mitigation to aesthetic impacts in the Wilburton Study Area outlined in Chapter 6, we suggest the city consider incentivizing trail-oriented development along Eastrail and the Grand Connection I-405 non-motorized crossing. For example, Section 6.5.3 "Other Proposed Mitigation Measures", only references adding more regulations and requirements that could limit a project's flexibility to best deliver trail-oriented design on the ground-level. Adding incentives to the toolbox of mitigation measures could ultimately help realize the Wilburton vision.
- O-51-14

O-51-12 A planned new I-405 bridge for pedestrians and bicycle riders is assumed in Action alternatives 1-3, and it will be incorporated into the preferred alternative. Preliminary design is expected to be initiated in the fall of 2023 with an expectation of 30% design by the end of 2024. System intersections in Wilburton and at arterial intersections throughout the city are listed and mapped in the Mobility Implementation Plan.

O-51-13 Comment noted.

O-51-14 Comment noted.

Once again, we want to thank the City of Bellevue for your consideration of these comments. We appreciate Bellevue leadership and staff's work on this periodic update. We look forward to working together to ensure Bellevue is not only prepared for future growth, but is well positioned to continue to thrive and be a fantastic place to live, work, and play for all. Should staff have any questions or would like to discuss these comments further, please contact me at phleung@amazon.com.

Sincerely,



Pearl Leung
Senior Manager, Public Policy
Amazon

CC:
Bellevue City Council
Brad Miyake, City Manager, City of Bellevue
Diane Carlson, Deputy City Manager, City of Bellevue
Michael Kattermann, Director of Community Development, City of Bellevue
Emil King, Planning Director, Community Development Department, City of Bellevue
Liz Stead, Interim Development Services Director and Land Use Director, City of Bellevue

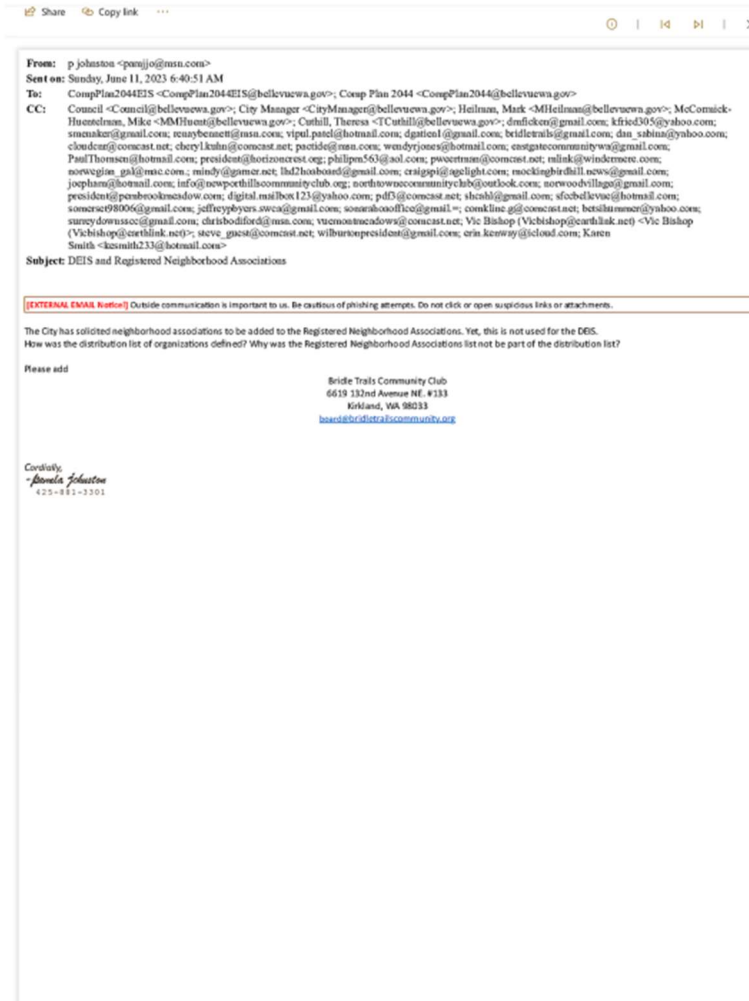
O-52

COMMENT

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O-52-1

The DEIS notice of availability was distributed in accordance with Washington Administrative Code 197-11-55(1) and 197-11-55(2). The distribution list included persons who provided comments during the 30-day scoping period (September 29, 2022, to October 31, 2022). The Bridle Trails Community Club did not submit formal comments during the scoping period and therefore was not on the DEIS distribution list. However, the organization has been added as a party of record for the FEIS distribution.



O-52-1

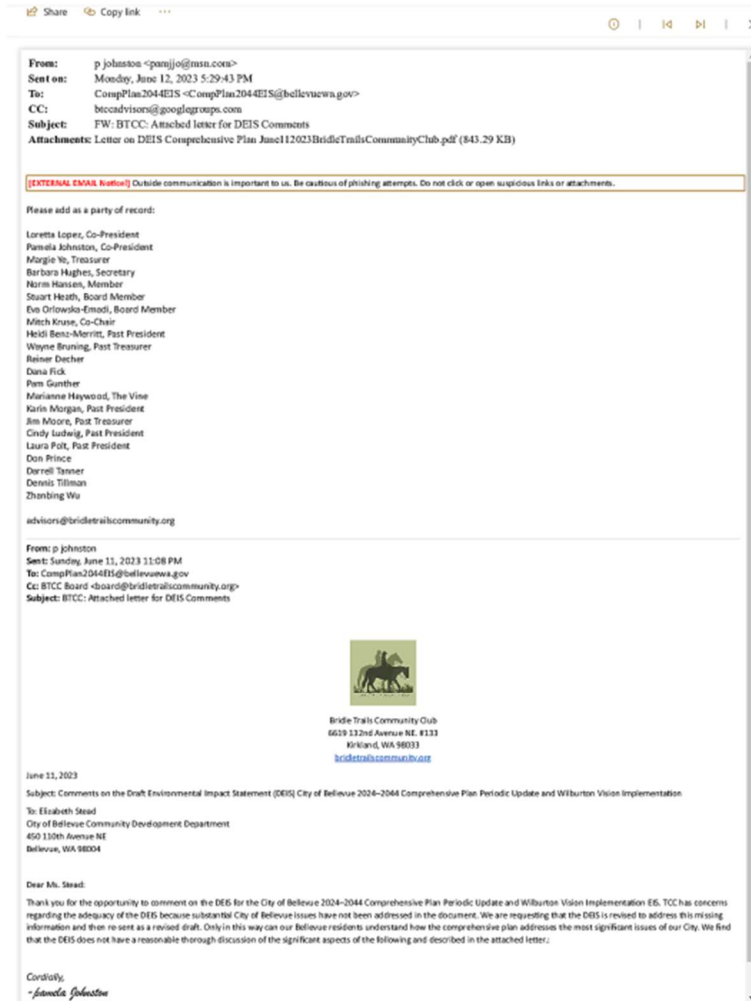
O-53

COMMENT

RESPONSE

O-53-1 You are added as a party of record.

O-53-1



O-54

COMMENT

RESPONSE

O-54-1 Comment noted.

McCULLOUGH HILL PLLC

June 12, 2023

VIA ELECTRONIC SUBMITTAL
CompPlan2044EIS@bellevuewa.gov

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

Re: Bellevue 2044 DEIS Comments

Dear Mr. Pittman:

We are writing on behalf of KG Investment Properties and Rockwood Capital to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investments and Rockwood Capital own 7 acres on the east side of 116th Avenue NE, between NE 4th Street and NE 6th Street (the "Property") – the heart of the Wilburton subarea and the point at which the Grand Connection and Eastrail will one day intersect. A map of the Property is attached for your reference. The Comprehensive Plan update will be important to the future use and development of our property and the role it will play in Bellevue's growth as a regional center.

General

- We support Alternative 3 as the Preferred Alternative in the FEIS. Alternative 3 achieves the most amount of growth in an area well-served by transit and other strong local and regional means of transportation, including bicycle and pedestrian connections, as well as a host of community-serving uses, such as grocery stores, medical services, restaurants, department stores and entertainment. It also provides the most flexibility in future uses in the Wilburton subarea.

O-54-1

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June 12, 2023
Page 2 of 8

Land Use

O-54-2

- **Uses.** Like Downtown, the range of permitted uses in Wilburton zones should be very broad, including all typical urban uses. The Plan should not attempt to micro-manage land uses within the Subarea, but it should instead allow flexibility for future development to follow market demand.

O-54-2 Permitting is outside the scope of this EIS. See Common Response 19 Zoning Details.

O-54-3

- **Urban Form.** Bellevue has traditionally used setbacks, building setbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitious buildings as designers substitute these dimensional tables in place of creative and site-specific design solutions. These types of regulations increase the cost of construction, reduce building efficiencies and the financial viability of new development – new development which is critical to realizing the Plan vision. Since the DEIS is an evaluation and disclosure document, it should also explore other options to solve the issues of building massing, human scale proportionality, site permeability and design rather than limiting the analysis to prescriptive and strict dimensional requirements. Developers should be allowed flexibility in how they achieve these urban design goals in lieu of prescriptive numbers.

O-54-3 See Common Response 19 Zoning Details.

O-54-4

- **Build-out of the Grand Connection and Eastrail.** The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. In Wilburton, Eastrail will extend the Grand Connection north and south throughout the region. The City created Code provisions decades ago to promote the dedication and development of the Pedestrian Corridor. These provisions have and continue to be successful in incentivizing the development of the Corridor, and these same approaches should be used for the extended areas of the Grand Connection and Eastrail. Specifically, we suggest that the Final EIS evaluate the use of the “superbonus” provided in the Downtown Code for the future dedication and development of the Grand Connection and Eastrail in Wilburton. As in Downtown, the dedication and development of the Grand Connection and Eastrail could create FAR amenity points at a 16:1 ratio and those bonuses could be used to develop floor area above the height and density limitations otherwise applicable in the Wilburton zone. This has been a successful approach to the build-out of the pedestrian corridor downtown, and its use in Wilburton would promote the implementation of the Grand Connection. [In addition, we note that the State Legislature adopted SB 5452 in this year’s session, allowing transportation impact fee revenue to be dedicated to the development of bicycle and pedestrian facilities. The Final EIS should discuss the importance of making this new tool available to support the future development of the Grand Connection and Eastrail.

O-54-5 See Common Response 1 Non-Project EIS vs. Project Level SEPA.

O-54-5

- **City Property.** The City-owned property on the west side of 116th Avenue NE near NE 6th Street (as extended) is a key element in formulating future land use patterns in Wilburton. Its location at the eastern end of the future Grand Connection I-405 Non-Motorized Crossing makes it an ideal location for potential public open space and neighborhood facilities. We encourage the City to explore such options in the Final EIS.

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COMMENT

RESPONSE

O-54-6	<ul style="list-style-type: none"> • Unit Density. The maps outlining future housing density by alternative (see, for example, Figure 2-2) establish 141 units per acre as a maximum residential density. This figure is quite low for an urban center environment; one would expect actual average densities in core areas to be much higher. The Final EIS should discuss actual projected residential densities in these core areas and determine whether this adjustment requires a refinement to the analysis.
O-54-7	<ul style="list-style-type: none"> • Future Land Use Map. The DEIS depicts the City's Future Land Use Map (FLUM) in Figure 3-6. However, this depiction does not accurately reflect the City's FLUM. Figure 3-6 is instead a highly generalized version of the FLUM, aggregating dozens of different actual land use categories into more general buckets. This generalization may be helpful for the reader, but it tends to mask a significant shortcoming of the City's Comprehensive Plan which the Final EIS should discuss. Bellevue's Comprehensive Plan in many areas employs FLUM designations that effectively mirror the zoning, so that in many cases there can be only a single implementing zone for a FLUM designation. The result in these cases is to prevent a rezone from being approved with a corresponding and prior amendment to the FLUM. This substantially reduces the ability of the rezoning process to be used as a tool for land use evolution in the periods between major Comprehensive Plan updates. The Final EIS should discuss converting the FLUM to a more generalized map, such as shown in Figure 3-6, to allow greater flexibility in zoning decisions going forward.
O-54-8	<ul style="list-style-type: none"> • Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton. <p>Transportation</p> <ul style="list-style-type: none"> • The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts. <p>For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years, with probably less than 50% of full build-out. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final</p>
O-54-9	<ul style="list-style-type: none"> • The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts.
O-54-10	<p>For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years, with probably less than 50% of full build-out. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final</p>

O-54-6	Density in mixed use areas was studied on a FAR-basis allowing for flexibility in the number of units provided in individual buildings.
O-54-7	See Common Response 18 Future Land Use Categories. See also DEIS Appendix B, <i>Land Use Patterns and Urban Form Appendix</i> , for more information on future land use designations.
O-54-8	The EIS is an analysis of potential future land use classifications, not specific zoning details. This level of detail will be addressed most appropriately through the city's development code.
O-54-9	As this EIS is a disclosure document, consistent with the requirements of SEPA, the assumptions are conservative to ensure that the analysis in the EIS adequately discloses and captures all potential transportation-related environmental impacts.
O-54-10	See Common Response 5 Assumption of Buildout.

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O-54-10

EIS should note that the likelihood of such 100% build-out occurring for any alternative within the life of the Plan is essentially zero. To ensure that the legislative policy discussion regarding the Plan is rooted in reality, the Final EIS should also provide comparative impact analysis for lesser build-out scenarios for each of the alternatives.

O-54-11 Comment noted.

O-54-12 See Common Response 10 Wilburton Street Grid.

O-54-13 Comment noted.

O-54-14 This is outside the scope of analysis for this EIS. See Common Response 19 Zoning Details.

O-54-11

- NE 6th should terminate at 116th Avenue NE. Alternative 3A proposes an extension of NE 6th Street to 120th Avenue NE and the DEIS properly notes the reasons to reject this concept. We suggest that Alternative 3A be eliminated from the Final EIS. The intersection of the Grand Connection with Eastrail is a special opportunity for trail-oriented development that could become the gateway to Bellevue from the regional trail system. The extension of NE 6th Street to 120th Avenue NE would not only destroy this potential, but it would also require an enormous investment of funding, resources and time. Introduction of yet another Eastrail crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets Eastrail and dramatically undermine the pedestrian development potential and experience between NE 4th and NE 8th. We believe extending NE 6th Street with a termination at 116th Avenue NE is the best option for Wilburton for all of the reasons cited in the DEIS. Introducing another auto crossing of Eastrail does not meet the neighborhood or City vision for Eastrail and introduces significant safety issues to Eastrail (DEIS, p. 11-110). In addition, extension of SE 6th to 120th achieves nothing material in terms of transportation or circulation benefits (DEIS, p. 11-111).

O-54-12

- Street Grid. Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a proposed road grid. No requirement of a “street grid” should be imposed on Wilburton. Grid streets can work well, as in Bel-Red, when they can be developed on generally flat or gently sloping topography and when they truly provide connections through and across a larger neighborhood to various destinations. Neither is the case here. The significant grades across the Property impair the use and activation of any such grid streets and those streets would not connect to any larger network – they would only dead-end into Eastrail or a retaining structure that supports it. The development of the Property can and should accommodate east-west pedestrian connections between 116th Avenue NE and Eastrail, but the introduction of vehicular access through the Property would be a mistake.

O-54-13

- Access from 116th Avenue NE. The Plan proposes to redevelop 116th Avenue NE into a new boulevard street. We endorse this design concept for 116th Avenue NE, but it must also be recognized that 116th Avenue NE will provide the only vehicular access for the high-density urban development sites adjoining it. Therefore, 116th Avenue NE must be planned and designed to satisfy these fundamental access requirements.

O-54-14

- Parking requirements. Required parking ratios should be flexible, demand-based and consistent with market requirements across other urban centers in Bellevue. Parking ratios that are too high or too low will only impede new urban development in this area. Furthermore, new development in Wilburton may reflect greater parking requirements than

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O-54-15 A description of the Grand Connection is included in DEIS Chapter 3, *Land Use Patterns and Urban Form*. A description of Eastrail is included in FEIS Chapter 11, *Transportation*. Impacts to Eastrail and the Grand Connection are included as part of the impacts to the Wilburton study area.

O-54-14

seen in Downtown and Bel-Red, based on potential technology tenants. The DEIS should address this reality.

O-54-16 Land use changes due to transit proximity have been removed from the Preferred Alternative.

O-54-15

- Grand Connection I-405 Non-Motorized/Bike/Ped Crossing of I-405. In April 2023, the City initiated the process of preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing (the "Grand Connection Crossing"). As we know, the Wilburton Subarea Plan includes an evaluation of the Grand Connection in general, which includes the Grand Connection Crossing. The vitality and design of future land uses in Wilburton will be significantly improved by the completion of the Grand Connection Crossing. The Final EIS should include a more thorough evaluation of the Grand Connection Crossing within the future transportation network. The Grand Connection Crossing should be identified as a key mobility mitigation measure both for Wilburton and the City as a whole.

O-54-17 The analysis of specific transportation projects is outside of the scope of this EIS.

O-54-16

- Transit Proximate Areas. The depiction of Transit Proximate Areas in the DEIS is based on current data as of 2023. This fails to account for the likely expansion of transit service throughout the City over the next 20 years. The Final EIS should evaluate the potential for such transit expansion and should recommend possible land use changes to accompany such expansions, if they occur.

O-54-17

- Eastrail Design. The DEIS should address the land use/urban design impacts of a grade-separated Eastrail crossing of NE 4th Street. In particular, the Final EIS should evaluate the potential impacts of a grade-separated alternative, including:
 - Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 4th Street will require approaches that stretch 500 feet north and south into key redevelopment areas under the Plan. Approximately 80% of the unique pedestrian experience along the Eastrail between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.
 - Such ramp structures will create a wall down the center of the Plan area and will divorce much of the Eastrail from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the Eastrail).
 - The substantial cost of a grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

An at-grade crossing option for NE 4th Streets was supported by the Wilburton CAC and has no adverse transportation impacts. It also allows a much-improved relationship between the Eastrail and adjoining land uses and avoids the construction of a wall through the middle of the Plan area. The Final EIS must fully evaluate the at-grade option in all Plan alternatives and undertake a complete assessment of the impacts of the grade-separated alternative as well.

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O-54-18 Comment noted. See Common Response 19 Zoning Details.

O-54-19 See Common Response 22 Mitigation Measures Required.

O-54-20 See Common Response 16 Critical Areas.

O-54-21 The EIS is an analysis of potential future land use classifications, not specific development regulations, or city code requirements regulating impervious surface in connection with specific private development proposals. Amendments to city regulation of impervious surfaces are most appropriately through amendments to specific city code provisions, which is outside the scope of this non-project environmental review.

Other Issues

O-54-18

- **“Air quality buffers”.** The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The Final EIS should eliminate this recommendation.

O-54-19

- **Mitigation.** The DEIS includes potential mitigation measures for many elements of the environment. It should be noted in the Final EIS that adoption of new comprehensive plan policies and zoning will be a legislative decision of the Bellevue City Council, and that since an environmental impact statement is being prepared, no mitigation is required under SEPA to address any adverse environmental impacts. The listing of potential mitigation measures in the DEIS only provides the City Council with options in the decision-making process. Ultimately, whether to adopt any mitigation measure identified in the DEIS lies in the sole discretion of the City Council.

O-54-20

- **Critical Areas.** Although the DEIS addresses a full comprehensive Plan update, it fails to address the City’s critical areas regulations. This is a significant omission. Bellevue’s critical areas regulations are outdated and inconsistent with the nature of urban development contemplated by the DEIS. The Final EIS should fully address this issue and identify revisions to the City’s critical areas regulations to promote urban development. These revisions for Wilburton would include:
 - Eliminating the density penalty included in the critical areas ordinance.
 - Rationalizing the ability of urban developments to address steep slope conditions with engineered retaining structures as an exemption to critical area ordinance compliance. This will be particularly important to ensure that development can occur alongside Eastrail and that the Eastrail experience can provide urban activation.

O-54-21

- **Impervious Surfaces.** The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should

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update its regulations accordingly.

- Views.** The DEIS should acknowledge that future development will impact views and solar access. The DEIS evaluates the impacts of future development in Wilburton on views from public places and on shadows on other public places, such as Eastrail. The Final EIS should acknowledge that Wilburton redevelopment will inevitably impact view and shadows in this way. Redevelopment of Wilburton is not possible without creating such impacts; but it is not likely that any of these impacts would be significant. The segment of Eastrail between NE 4th Street and NE 8th Street is a unique opportunity on the entire trail for activation and urban-scale trail-oriented development. While there will be outstanding opportunities for light and view along the full Eastrail system, this is the one location on the entire Eastrail where there is the opportunity for significant trail-oriented urban development. This opportunity should not be limited or lost in an effort to address views and shadows on this limited segment of Eastrail. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation. Private views should also similarly not be regulated, and impacts to density should be reviewed. If public views are regulated, the City should specifically define a public view (from what viewpoint, views of which features are protected), and the impacts to potential density and the tradeoffs of protecting views and shadows in this manner should be adequately studied.

The DEIS should also evaluate the ways in which Plan implementation will create new views and solar access. Implementation of the Plan will create enormous new areas of open space and pedestrian paths and connection, which in turn will offer new viewpoints and opportunities for solar access throughout the Plan area. The Grand Connection by itself will become perhaps the best and most unencumbered viewpoint in the City to take in views of Mt. Rainier, the cityscape and the Cascade Mountains. Further, the Plan will transform the Wilburton area from one that is currently hostile to pedestrians to an urban village with robust new pedestrian activity, meaning that thousands more will be able to enjoy the new views created by the Plan. These comparative impacts should be evaluated in the Final EIS.

- District Energy Solutions.** The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the Final EIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure.

O-54-22 The EIS analyses impacts to public view only. As the commenter notes, development may impact some existing views and create new views. See DEIS Chapter 6, *Aesthetics*, for more information on the impact to views.

O-54-23 The scope of the DEIS was to determine the physical effects of future growth under each of the alternatives on the environment. Consideration of how best to encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and energy demand will be evaluated at the time growth under the Preferred Alternative is implemented.

O-54-22

O-54-23

O-54

COMMENT

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June 12, 2023
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We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,


John C. McCullough

cc: Rockwood Capital
KG Investment Properties

O-55	COMMENT	RESPONSE
O-55-1	<p>We support Alternative 3 - it is the only option presented that comes close to providing enough housing for our growth targets. We don't love the increased jobs, we think we need closer to a 1:1 ratio of jobs and housing, but we'll take it because it is the option that provides the most housing. We especially like the inclusion of housing on Lake Bellevue - nearly all of the waterfront in this region is privately owned and it's such a shame more people don't get to even approach or see it.</p>	<p>O-55-1 See Common Response 4 Housing Alternatives. See Common Response 13 Growth Targets.</p>
O-55-2	<p>The city should not be considering any roadway expansions including extending NE 6th. Roadway expansions only induce more people to drive and the expensive, new infrastructure will quickly be full of traffic. We must make it easy for people to get places without personal vehicles - it is the ONLY way to improve the mobility in this region. The city should consider repurposing existing travel lanes for buses and bikes, and we need to be doing this quickly and flexibly. The city absolutely should consider eliminating parking minimums.</p>	<p>O-55-2 The transportation chapter does include an analysis of the extension of NE 6th. Other potential changes to the transportation network, including expansion of non-car transportation, are included as possible mitigation measures to manage the overall impact on the transportation network. See FEIS Chapter 11, <i>Transportation</i>.</p>
O-55-3	<p>The city should not be considering any roadway expansions including extending NE 6th. Roadway expansions only induce more people to drive and the expensive, new infrastructure will quickly be full of traffic. We must make it easy for people to get places without personal vehicles - it is the ONLY way to improve the mobility in this region. The city should consider repurposing existing travel lanes for buses and bikes, and we need to be doing this quickly and flexibly. The city absolutely should consider eliminating parking minimums.</p>	<p>O-55-3 The Bellevue Mobility Implementation Plan provides the vision for a complete and connected network for all modes throughout the city. The Bike Bellevue project will consider design concepts for bicycle corridors in the urban core (Downtown, BelRed, Wilburton) that may include repurposing existing travel lanes.</p>
O-55-4	<p>We believe the most significant thing Bellevue could do to improve mobility would be to allow some types of commercial businesses in residential areas. Corner store groceries in every neighborhood would allow people to get their most essential and frequent errands taken care of without a vehicle. Accessory Commercial Units could be an option to consider - allowing residents to have small shops, cafes, bars, salons, clinics, etc on their residential property instead of needing to commute to a job and allowing other neighbors to get some needs met without driving to a commercial center.</p>	<p>O-55-4 See Common Response 19 Zoning Details.</p>
O-55-5	<p>We believe the most significant thing Bellevue could do to improve mobility would be to allow some types of commercial businesses in residential areas. Corner store groceries in every neighborhood would allow people to get their most essential and frequent errands taken care of without a vehicle. Accessory Commercial Units could be an option to consider - allowing residents to have small shops, cafes, bars, salons, clinics, etc on their residential property instead of needing to commute to a job and allowing other neighbors to get some needs met without driving to a commercial center.</p>	<p>O-55-5 See Common Response 19 Zoning Details.</p>
O-55-6	<p>Overall, we are dismayed by the entire comp plan process because of how rigid and inflexible it is. "Smoke season" only started in the last 5 years - what other unanticipated climate impacts will we see in the next 10 years? Charles Darwin said "It is not the strongest of the species that survives, not the most intelligent that survives. It is the one that is the most adaptable to change." We need to learn to be more flexible and able to roll out changes incrementally and quickly, and iterate from what we learn.</p>	<p>O-55-6 Comment noted.</p>
O-55-7	<p>Overall, we are dismayed by the entire comp plan process because of how rigid and inflexible it is. "Smoke season" only started in the last 5 years - what other unanticipated climate impacts will we see in the next 10 years? Charles Darwin said "It is not the strongest of the species that survives, not the most intelligent that survives. It is the one that is the most adaptable to change." We need to learn to be more flexible and able to roll out changes incrementally and quickly, and iterate from what we learn.</p>	<p>O-55-7 See Common Response 12 Impacts of Climate Change.</p>

O-56

COMMENT

RESPONSE

Please see attachment.



p 425.453.1223 | f 425.646.6634
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10900 NE 4th St, Suite 250
Bellevue, WA 98004

June 12, 2023

City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

Re: BDA Comments on Draft Environmental Impact Statement for the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To Whom it May Concern:

We are writing on behalf of the Bellevue Downtown Association (BDA) to share comments on the Draft Environment Impact Statement (DEIS) that serves to identify and analyze potential unavoidable or adverse impacts and mitigation measures that could result from the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The City's has been successful advancing proactive policies and strategic investments in support of a thriving Downtown Bellevue has proven to be a highly successful and effective approach, supporting the long-term economic and cultural wellbeing of the entire city. Our comments reinforce this strategy and incorporate feedback from our BDA-member workgroup focused on the DEIS. Their discussion was framed by a set of principles for desired outcomes generated by the [BDA Board of Directors](#).

1. Balance uses to support sustainable growth and long-term viability.
2. Focus density around light rail and encourage transit-oriented development (TOD).
3. Promote flexibility to ensure plans can adapt to changing conditions.
4. Support maximum density to optimize development potential.

We recommend the City pursue land use Alternative 3 for both the City at-large and Wilburton study area as the preferred alternatives. The primary reason is because both options provide the most opportunities to increase development capacity for housing to match the City's needs and support flexibility for neighborhood development based on changing conditions. In addition, the workgroup identified additions for the Final Environment Impact Statement (FEIS) to ensure a holistic body of information to inform future work on the Comprehensive Plan policies and Wilburton Vision Implementation. If topics outlined in our feedback do not fall within scope of the FEIS, we request the City clarify what future initiatives and/or body of work will cover the desired information so that the BDA and its members can plan appropriately.

Our feedback is outlined under two categories: 1) City at-large, representing the DEIS information about the Comprehensive Plan Update and 2) Wilburton, representing the DEIS information about the Wilburton Vision Implementation.

1

O-56

COMMENT

RESPONSE

CITY AT-LARGE

Requests for additional information or analysis to be included in the FEIS.

- O-56-1 | 1. Analyze benefits and tradeoffs of development incentives versus mandates related to housing, particularly on affordable housing. The preferred alternative should not select a specific approach, instead it should recognize that an affordable housing program may be incorporated with the upzone, and it should study the pros and cons of each approach, including legality. The FEIS must also disclose all assumptions, economic study, and assumed number of housing units under the various programs studied.
- O-56-2 | 2. Provide detailed information about how the multimodal transportation network will accommodate increased density, noting benefits and tradeoffs.
- O-56-3 | 3. Clarify how the City plans to mitigate vehicular congestion impacts to meet performance targets and examine whether there are any significant impacts even if the identified mitigation measures are implemented.
- O-56-4 | 4. Last-mile solutions will be critical to supporting the growth proposed in the land use alternatives. Provide more information about how transit and pedestrian pathways will be supported, noting benefits and tradeoffs.

WILBURTON

Key points regarding the Wilburton information and requests for include additional information or analysis for the following topics to be included in the FEIS.

Key Points

- O-56-5 | 1. Add specific information about Grand Connection and Eastrail, including the future I-405 non-motorized crossing that is part of the Grand Connection. These major investments will shape Wilburton's future. The FEIS must reflect these multimodal improvements to support the growth alternatives and the neighborhood's future potential.
- O-56-6 | 2. Recognize Wilburton can be an important complement to Downtown that will develop as its own unique neighborhood over time with distinctive qualities and amenities. Future work to examine the relationship between Downtown and Wilburton's potential is important information to supporting the vision's implementation.
- O-56-7 | 3. Recommend NE 6th Extension project end at 116th Ave NE. If built to 120th Ave NE, the project could negatively impact both the Grand Connection and Eastrail, as well as future housing and commercial development. Furthermore, the FEIS should disclose the transportation benefits and tradeoffs of this connection to inform future decision making.

Additional Information or Analysis to Include in FEIS

- O-56-8 | 1. Share more information on how to support housing production, particularly affordable and workforce. Include 1) analysis regarding benefits and tradeoffs of development incentives versus mandates and 2) details regarding which development standards hinder or promote building forms that support multifamily midrise housing.

- O-56-1 | See Common Response 4 Housing Alternatives for information on how affordable housing was analyzed in the EIS.
- O-56-2 | See FEIS Chapter 11, *Transportation*. The mitigation measures suggested are actions the city can take to minimize the impact on the transportation network as a whole. The measures have varying levels of impact on the city's attainment of its performance targets. Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area and does not include a cost-benefit analysis of each mitigation measure. The city may, or may not, incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations.
- O-56-3 | The EIS is a disclosure document, disclosing potential impacts of the development. It includes measures that can be taken to mitigate those impacts. The EIS also discloses potential unavoidable significant adverse environmental impacts, which are impacts that may not be mitigated to a less than significant level in connection with the full build out of the growth alternatives analyzed in the EIS. Nevertheless, the EIS also discloses that the environmental analysis utilizes a conservative approach with respect to this build out and impact analysis.
- O-56-4 | See FEIS Chapter 11, *Transportation*. The mitigation measures suggested are actions the city can take to minimize the impact on the transportation network, including the first mile/last mile of trips. The measures have varying levels of impact on the city's attainment of its performance targets. Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review. This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area and does not include a cost-benefit analysis of each mitigation measure. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, plans, standards, or regulations.
- O-56-5 | A description of the Grand Connection is included in DEIS Chapter 3, *Land Use Patterns and Urban Form*. A description of Eastrail is included in FEIS Chapter 11, *Transportation*. Impacts to Eastrail and the Grand Connection are included as part of the impacts to the Wilburton study area
- O-56-6 | Comment noted.
- O-56-7 | The EIS is a disclosure document that analyzes the range of alternatives, potential environmental impacts, and potential mitigation for those impacts; but the analysis of trade-offs is outside of the scope of this EIS.
- O-56-8 | See Common Response 4 Housing Alternatives.

O-56

COMMENT

RESPONSE

O-56-9

2. Provide more details on how land use scenarios can leverage East Link, Eastrail, and the Grand Connection. Also, provide insights into development incentive that can leverage these major multimodal projects.

O-56-10

3. Include more information about specific areas of Wilburton to support future consideration of potential subareas.

- Examine the development viability of the growth areas based on constraints and opportunities associated with topography, existing built environment, mobility connectivity and access.
- Share how master plan developments of a large parcel or series of parcels can impact the area; note benefits and tradeoffs.

O-56-11

4. Examine conditions that would support dynamic places in Wilburton with vibrant 18-24-hour amenities and attractions.

O-56-12

5. Provide more information about how the proposed street network interacts with existing conditions, such as topography, parcel constraints, properties likely or not likely to redevelop, and tools/methods to advance neighborhood buildout.

- Examine lessons learned from Bel-Red's rezone and vision implementation.
- Study whether the proposed street network is necessary or beneficial for neighborhood mobility.

O-56-13

6. Provide more information on the air quality findings and how these findings will impact future development. Examine how potential buffers compare to Downtown and East Main mitigation measures and study how air qualities standards measure up to market-driven solutions.

We appreciate the City's effort to undergo an intensive process to examine existing conditions and collect community input. Thank you for leading the City's growth and continued support of Downtown.

Sincerely,



Patrick Bannon
BDA President & CEO



Matt Jack
BDA Director of Public Policy

O-56-9

This is outside the scope of analysis for this EIS. In DEIS Chapter 1, *Summary*, Table 1-1, the document is identified as a non-project EIS that analyzes the proposals and alternatives broadly across the study area. 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. A non-project EIS does not provide site-specific detailed analysis or mitigation.

O-56-10

This is outside the scope of analysis for this EIS. In DEIS Chapter 1, *Summary*, Table 1-1, the document is identified as a non-project EIS that analyzes the growth alternatives broadly across the study area, identifies environmental impacts associated with those alternatives, and identifies potential mitigation for the impacts disclosed. The environmental review in the EIS is not evaluating master development plans, or other project-level development proposals that may occur in Wilburton following any amendments that may be adopted to the Wilburton policies or regulations.

O-56-11

This is outside the scope of analysis for this EIS, which analyzes the environmental impacts associated with a range of growth alternatives and identifies potential mitigation for the impacts disclosed.

O-56-12

See Common Response 10 Wilburton Street Grid.

O-56-13

See Common Response 8 Air Quality and GHG.

O-57

COMMENT

RESPONSE

O-57-1 See Common Response 4 Housing Alternatives.



City of Bellevue Development Services Dept
 Attn: Elizabeth Stead
 450 110th Ave NE,
 Bellevue WA 98004

6/12/2023

To Elizabeth Stead and City of Bellevue Development Services,

Hello, my name is Cliff Cawthon, and I am the Advocacy and Policy Manager for Habitat for Humanity of Seattle-King & Kittitas Counties. We are a permanent affordable housing developer that has built homes in partnership with community members in King County for 37 years. I am writing to provide comments on Bellevue's Draft Environmental Impact Study and to encourage you and the staff to explore the Draft Environmental Impact Study's (DEIS) Third Alternative.

We applaud the work that Bellevue's city staff has already done to create an inclusive conversation around how to tackle the City of Bellevue's housing crisis. The third study alternative in the DEIS is the best positioned to maximize the value of Bellevue's implementation of mandatory inclusionary zoning. The alternative analyzes the potential of adding 90,000 plus additional housing units and the potential for tens of thousands of jobs that will come to Bellevue soon.

According to the County and Bellevue's estimated housing need people making less than 80% of Area Median Income (AMI), particularly below 30% AMI are in desperate need of housing. Habitat homeowners like Lila will be the first in her family to own a new home because of the opportunities we can create through aligning land use codes to make affordable homeownership possible. Congregants of Holy Cross Lutheran Church who are facing displacement are enthusiastically partnering with us to build our new Orchard Gardens community development in response to the lack of housing which drives 89% of Bellevue's labor force to commute into the city every week.

Alternative Three goes the farthest in the areas that are key to building affordable housing: addressing housing needs, permitting more middle housing construction, addressing economic displacement and identifying strategies for acquiring and allocating surplus land for more affordable housing. To comply with HB 1110, the middle housing bill, the preferred Alternative must make modifications to Alternative Three, to increase the range of middle housing options allowed throughout Bellevue to accommodate fourplexes citywide, and sixplexes when two of the homes are affordable or near transit.

O-57-1

O-57

COMMENT

RESPONSE

O-57-2

The FEIS analyzes the preferred alternative that is a hybrid of alternatives studied in the DEIS and most-closely resembles Alternative 3. The FEIS studies, at a policy level, both mandatory and voluntary (incentive-based) affordable housing programs as options in the FEIS. The FEIS provides further analysis on mandatory and voluntary (incentive-based) inclusionary affordable housing tools, including additional information on how mandatory affordable housing requirements would compare to voluntary provisions when development potential is increased. Additional discussion is also provided in the FEIS related to HB 1220 and provides additional analysis on sufficient land capacity to accommodate the city's projected housing needs.

Other options, such as the no-change option do not address these areas of concern in a satisfactory way. With the no-change option, without changes to the zoning map to allow for more multifamily housing development and mixed-use centers the City of Bellevue will disincentivize continued growth. Under this status quo, Bellevue will continue to have exclusive neighborhoods that prevent its workforce from living near where they work.

Alternative One, while it begins to allow more density, it is limited to the downtown core, Wilburton, and the Bel-Red Corridor. These limitations would miss the value that could be captured in mixed-use and neighborhood centers throughout the city including near new and growing transit centers. Alternative Two goes further but it still concentrates on certain growth corridors in the city and does not meet the expectations for middle housing under state law and with best practices. The decrease in office capacity in Alternative Two also may potentially stifle economic growth and the potentiality of leveraging commercial development to increase the capacity for affordable housing.

As the DEIS notes, Alternative 3 has the greatest potential to reduce economic displacement by creating more housing overall and more affordable housing. This effect should be quantitatively estimated and explicitly defined to accurately compare overall residential economic displacement risks between the alternatives. Likewise based on HB 1220, the city must conduct an analysis of inventory and housing needs in alignment with King County's housing allocation targets. This alternative would support developing appropriate anti-displacement strategies and effective tools, such as inclusionary zoning. The Final Environmental Impact Survey (FEIS) should also analyze the impact of midrise low-cost housing typologies; such as, townhomes, duplexes, and housing types all the way to sixplexes.

The city's FEIS should investigate the gap between current funding sources and the projected need for funding for potential affordable housing projects. One example of a funding tool that has resulted in substantial support for affordable housing projects is a fee-in-lieu (FIL) alternative. A FIL structure would allow developers flexibility and the city of Bellevue to invest in affordable housing.

Best Regards,

Cliff Cawthon

Advocacy and Policy Manager
Habitat for Humanity of Seattle-King & Kittitas Counties
(206) 747-7694
Cliff.cawthon@habitatskc.org

O-57-2

O-58

COMMENT

RESPONSE

ETA's East King County I-405 Unfunded Project List

Bellevue

Description of Capacity Projects, (Updated to Transportation 2050, Appendix D)

I-405 Master Plan (S. 43rd St., Renton to 164th St. SW, Lynnwood)	Estimated		City	Legislative District(s)	PSRC App. D Project #	App D pg.	Source
	\$ Million						
Downtown Bellevue Access I-90 to NE 4th St	\$ 486		Bellevue	41, 48	4338	155	1, 2
Downtown Bellevue Access NE 4th to SR 520	\$ 837		Bellevue	41, 48	5638	155	1
SR 520 @ 124th Ave. NE Half Diamond IC, Bellevue	\$ 175		Bellevue	48	4528	196	1, 2
I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1, Bellevue	\$ 640		Bellevue	41	5441	156	1
I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2, Bellevue	\$ 349		Bellevue	41	4376	157	1
I-405, NE 8th St. and SR 520 Interchange Improvements, Bellevue	\$ 973		Bellevue	48	4382	159	1
I-405, SR 520 Interchange, Direct Connection, Bellevue to Redmond	\$ 454		Bellevue	48	4383	162	1
I-405, SR 520 to NE 70th Pl. Northbound Auxiliary Lane, Bellevue, Kirkland	\$ 30		Bellevue, Kirkland	48	4346	162	1
I-405, SR 520 to NE 70th Pl. Southbound Auxiliary Lane, Bellevue, Kirkland	\$ 25		Bellevue, Kirkland	48	5653	163	1
I-405, SR 520 to SR 522 (Widening - SR 520 to NE 124th St), Bellevue, Kirkland	\$ 174		Bellevue, Kirkland	45, 48	4387	163	1
I-405, SR 169 to I-90 Widening and Interchange Imp., Renton, Newcastle, Bellevue	\$ 1,072		Bellevue, Renton	11, 41	4315	162	1
Bellevue Total		\$ 5.2 Billion					

Source of project cost data:

- PSRC 2050 Regional Transportation Plan - Appendix D: <https://www.psrc.org/media/5938>
- City of Bellevue 2022 Legislative Agenda

Eastside Transportation Association (ETA), Victor H. Bishop, P.E., Chair Emeritus
Approved by the ETA Board of Directors, Nov 2, 2022

Bellevue

Urban Eastside Unfunded State Highway Project List

Description of Capacity Projects, (Updated to Transportation 2050, Appendix D)

App D pg.	I-405 Master Plan (S. 43rd St., Renton to 164th St. SW, Lynnwood)	Estimated		City	Legislative District(s)	PSRC App. G Project #	Status	Complete	PSRC Score
		\$ Billion	Source						
155	Downtown Bellevue Access I-90 to NE 4th St	\$ 0.486	1, 2	Bel	41, 48	4338	Candidate	2030	72
155	Downtown Bellevue Access NE 4th to SR 520	\$ 0.837	1	Bel	41, 48	5638	Candidate	2040	71
196	SR 520 @ 124th Ave. NE Half Diamond IC, Bellevue	\$ 0.175	1, 2	Bel	48	4528	Approved	2026	69
156	I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1, Bellevue	\$ 0.640	1	Bel	41	5441	Candidate	2030	65
157	I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2, Bellevue	\$ 0.349	1	Bel	41	4376	Unprogrammed	2040	69
159	I-405, NE 8th St. and SR 520 Interchange Improvements, Bellevue	\$ 0.973	1	Bel	48	4382	Unprogrammed	2040	70
162	I-405, SR 520 Interchange, Direct Connection, Bellevue to Redmond	\$ 0.454	1	Bel	48	4383	Candidate	2030	71
162	I-405, SR 520 to NE 70th Pl. Northbound Auxiliary Lane, Bellevue, Kirkland	\$ 0.030	1	Bel, Kr	48	4346	Unprogrammed	2040	59
163	I-405, SR 520 to NE 70th Pl. Southbound Auxiliary Lane, Bellevue, Kirkland	\$ 0.025	1	Bel, Kr	48	5653	Candidate	2030	59
163	I-405, SR 520 to SR 522 (Widening - SR 520 to NE 124th St), Bellevue, Kirkland	\$ 0.174	1	Bel, Kr	45, 48	4387	Unprogrammed	2040	61
162	I-405, SR 169 to I-90 Widening and Interchange Imp., Renton, Newcastle, Bellevue	\$ 1.072	1	Bel, Ren	11, 41	4315	Candidate	2030	70
Bellevue Total		\$ 5.2 Billion							

Source of project cost data:

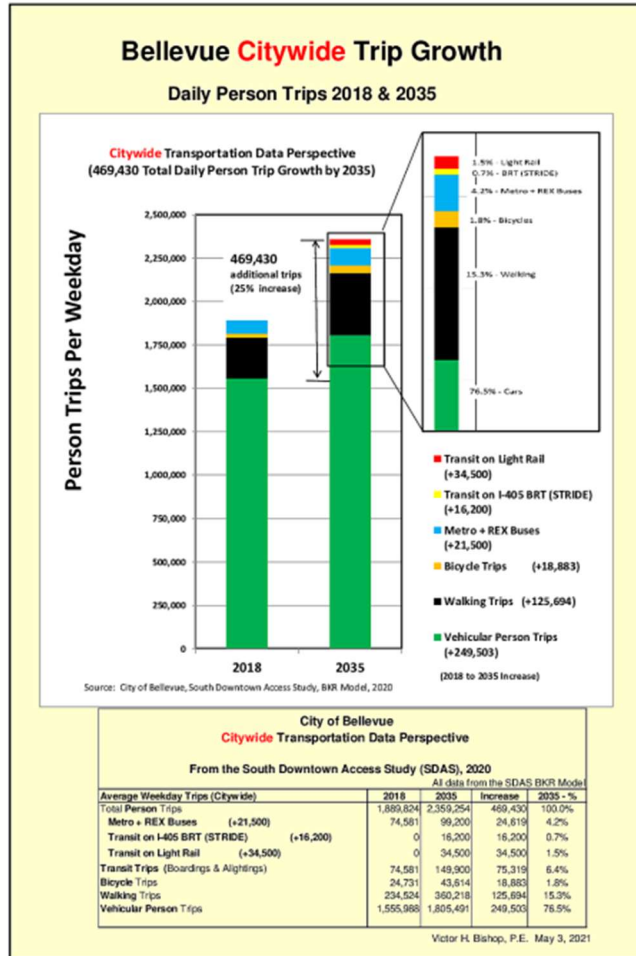
- PSRC 2050 Regional Transportation Plan: https://www.psrc.org/sites/default/files/appendix_d_regional_capacity_project_list_administrative_procedures_011322.pdf
- Bellevue Chamber of Commerce 2022 Transportation Committee Legislative Agenda

Eastside Transportation Association (ETA), Victor H. Bishop, P.E., Chair Emeritus
Approved by the ETA Board of Directors, Nov 2, 2022

O-58

COMMENT

RESPONSE



O-58

COMMENT

RESPONSE



Dedicated to improving our quality of life and environment by reducing congestion through increased mobility.
www.eastside transportation.org

Summary by Legislative District

PSRC Transportation 2050 unfunded Eastside State Highway Projects included in the PSRC Appendix D Project List ¹ by Legislative District (\$ Billion)			
Legislative District	I-405 Master Plan Projects	Non I-405 Eastside Capacity Projects	Total PSRC Appendix D Eastside Capacity Projects on I-405 & State Highways
District 21	\$ 0.04	-	\$ 0.04
District 1	\$ 3.3	\$ 0.25	\$ 3.5
District 45	\$ 1.9	\$ 0.19	\$ 2.1
District 48	\$ 3.9	\$ 0.10	\$ 4.0
District 41	\$ 3.5	\$ 0.09	\$ 3.6
District 5	-	\$ 0.43	\$ 0.4
District 11	\$ 4.5	\$ 0.34	\$ 4.8

Source:
 1. PSRC 2050 Regional Transportation Plan - Appendix D. Regional Capacity Projects:
<https://www.psrc.org/media/5938>
 Note: Multiple projects in multiple Districts - Sum of individual Districts greater than total projects

Summary by City

PSRC Transportation 2050 unfunded Eastside State Highway Projects included in the PSRC Appendix D Project List ¹ by city (\$ Billion)			
City	I-405 Master Plan Projects	Non I-405 Eastside Capacity Projects	Total PSRC Appendix D Eastside Capacity Projects on I-405 & State Highways
Bellevue	\$ 5.2		\$ 5.2
Bothell	\$ 3.2	\$ 0.12	\$ 3.3
Kirkland	\$ 1.9		\$ 1.9
Lynnwood	\$ 1.1		\$ 1.1
Renton	\$ 3.3	\$ 0.34	\$ 3.6
Tukwila	\$ 1.8		\$ 1.8
Redmond		\$ 0.10	\$ 0.1
Woodinville		\$ 0.06	\$ 0.1
Issaquah		\$ 0.09	\$ 0.1
Maltby		\$ 0.11	\$ 0.1
Unincorporated Snohomish Co.		\$ 0.13	\$ 0.1

Source:
 PSRC 2050 Regional Transportation Plan - Appendix D. Regional Capacity Projects:
<https://www.psrc.org/media/5938>
 Note: Multiple projects in multiple cities - Sum of individual cities greater than total projects

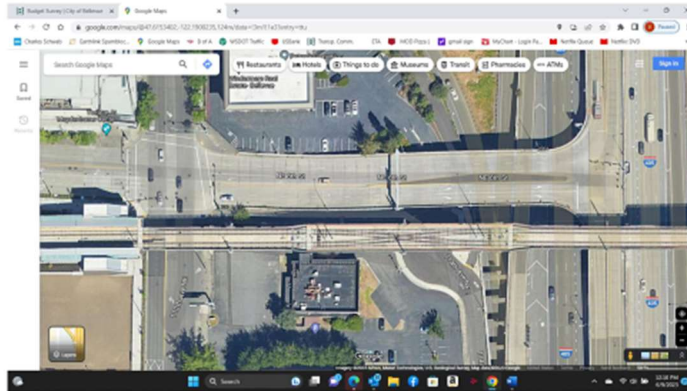
Eastside Transportation Association, PO Box 50621, Bellevue, Washington 98015

O-58

COMMENT

RESPONSE

NE 6th St., 112th Ave. NE to center of I-405, Google Maps screenshot, June 9, 2023



ETA's Urban Eastside Unfunded I-405 Project List

Description of Capacity Projects. (Updated to Transportation 2050, Appendix D)

Description of Capacity Projects	Estimated \$ Million	City	Legislative District(s)	PSRC App. D Project #	App. D Prg. Source
I-405 MASTER PLAN - Renton (SW 43rd St.) to Lynnwood (264th St. SW)					
SR 520 @ 124th Ave. NE Half Diamond IC	\$ 175	Bellevue	48	4528	396 1, 2
Downtown Bellevue Access I-90 to NE 4th St	\$ 486	Bellevue	41	4338	335 1, 2
Downtown Bellevue Access NE 4th to SR 520	\$ 837	Bellevue	41, 48	5618	335 1
I-405; SR 520 Interchange, Direct Connection	\$ 454	Bellevue	48	4383	362 1
I-405; NE 80th St. and SR 520 Interchange Improvements	\$ 973	Bellevue	48	4382	339 1
I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1	\$ 640	Bellevue	41	3441	236 1
I-405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2	\$ 349	Bellevue	41	4376	237 1
I-405; SR 520 to NE 70th Pl. Northbound Auxiliary Lane	\$ 30	Bellevue, Kirkland	48	4346	362 1
I-405; SR 520 to SR 522 (Widening - SR 520 to NE 124th St)	\$ 174	Bellevue, Kirkland	45, 48	4387	363 1
I-405; SR 520 to NE 70th Pl. Southbound Auxiliary Lane	\$ 25	Bellevue, Kirkland	48	5653	363 1
I-405; SR 165 to I-90 Widening and Interchange Imp.	\$ 1,072	Bellevue, Renton	11, 41	4315	362 1
I-405; North General Purpose Interchanges	\$ 1,207	Kirkland, Bothell	1, 45, 48	4388	339 1
I-405; No. Corridor HOV/ETL Direct Access R., NE 195th St. IC	\$ 424	Bothell	1	4398	339 1
I-405; SR 527 to I-5 ETL Widening and Interchange Improvements	\$ 662	Bothell, Lynnwood	1	4401	364 1
I-405; SR 527 to I-5 ETL	\$ 463	Bothell, Lynnwood	1	4402	365 1
I-405 Corridor Park and Ride Expansion, Full Corridor	\$ 90	King County Metro	48	5699	50 1
I-405; NE 85th St. to NE 124th St. Widening, I GP each way	\$ 39	Kirkland, Bothell	45	4351	358 1
I-405; NE 124th St. to SR 527 Widening	\$ 572	Kirkland, Bothell	1, 45	4392	358 1
I-405; I-5/I-405 to 264th St. SW; Auxiliary Lane	\$ 39	Lynnwood, Snoh. Co.	21	5714	358 1
I-405; SR 167 Interchange Area Improvements (Tier 1)	\$ 299	Renton	11	4307	360 1
I-405; SR 167 - 180th St./20th 43rd St. to I-405 Widening	\$ 398	Renton	11	4310	361 1
I-405; SR 167 Interchange Area Improvements (Tier 2)	\$ 1,201	Renton	11	4314	361 1
I-405 @ I-5 Tukwila Interchange Improvements	\$ 1,083	Tukwila	11	4360	356 1
I-405; I-5 to SR 367 ETL 2nd Phase, SR 381 IC	\$ 466	Tukwila, Renton	11	4364	357 1
I-405; SR 167 Interchange SR 381 to SR 167	\$ 291	Tukwila, Renton	11	5617	361 1
Subtotal, I-405 Master Plan Completion \$ 11.9 Billion					

Source of project cost data:
 1. PSRC 2050 Regional Transportation Plan - Appendix D: <https://www.psrc.org/tra/ra/2050>
 2. City of Bellevue 2022 Legislative Agenda

Eastside Transportation Association (ETA),
 Victor H. Bishop, P.E., Chair Emeritus
 Approved by the ETA Board of Directors, Nov 2, 2022

O-58

COMMENT

RESPONSE

O-58-1 Comment noted.

Eastside Transportation Association

"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"
 P.O. Box 50621
 Bellevue, WA 98015-0621

June 9, 2023

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

Re: 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation DEIS

Dear Ms. Stead,

The Eastside Transportation Association (ETA) submits this comment letter on the Draft Environmental Impact Statement (DEIS) for the referenced project.

You have before you a very significant transportation policy document for review and comment with recommendations. The Comprehensive Plan amendments and Wilburton Vision Implementation could fundamentally change the policy of the city regarding traffic congestion.

ETA's comments primarily relate to Chapter 11 - Transportation.

In 2021, City Council unanimously adopted Comprehensive Plan policy TR-2, which states the goal:

To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users.

This Comprehensive Plan policy was unanimously adopted by the Council after robust community discussion about revisions to the previous version of this policy which stated: **"Strive to reduce congestion and improve mobility"**.

A. ETA's summary of significant DEIS transportation disclosures

The adoption of TR 2 sent the strong message by the Council to "...aggressively plan, manage, and expand transportation investments to reduce congestion..." Language in the DEIS appears not to align with this stated goal. For example:

1. The first paragraph of Section 11.1, page 11-1 states: "Bellevue's approach to mitigating potentially significant impacts on the transportation system is presented in the Avoidance, Minimization, and Mitigation Measures section..."
2. Table 11-36, pp 11-104-105, lists 33 **System Intersections** that would be 'significantly impacted' by Alternative 3. Twenty-four of these System Intersections would have a volume/capacity (V/C) ratio greater than 1.0. A ratio greater than 1.0 means that more than 100% of the vehicle carrying capacity of an intersection is consumed by the projected vehicle volume. This results in traffic signal operations deteriorating to the point of vehicles waiting multiple red light cycles to get through the intersection, an obvious "significant impact," as identified in the DEIS.

O-58-2 See FEIS Chapter 11, *Transportation*, for additional information on potential impacts and mitigation measures.

O-58-3 Comment noted.

O-58-1

O-58-2

O-58-3

O-58

COMMENT

RESPONSE

Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023

O-58-4

3. Table 11-37, p 11-107, lists 19 **Primary Vehicle Corridors** that would have operation speeds not meeting the Performance Target, seven of which clearly represent a “significant impact” all over the City, some with operating speeds of four to five miles per hour. Operating speeds of four to five miles per hour (pedestrian walking speed) over more than one-half mile reflects the failed System Intersections identified above.

O-58-5

4. Table 11-38, p 11-110, lists 4 **State Facility study locations** that would not meet the Washington State Department of Transportation’s (WSDOT) standard (Volume-to-LOS D Maximum Service Volume Ratio). This means that I-405 and SR 520 East of I-405 would continue to have multiple hours of severe congestion daily.

O-58-6

5. Table 11-40, p 11-115 summarizes Significant Impacts Resulting from Action Alternatives. For Alternatives 1, 2, and 3 **only the Intersection V/C, Primary Vehicle Corridor Travel Speed and State Facilities have Significant Impacts**. There are no significant impacts listed for the Pedestrian Network, Bicycle Network, Transit Network, Safety, Parking, VMT (vehicle miles traveled) Per Capita, nor Transit Travel Time. The only significant impacts identified are automobile related impacts.

O-58-7

6. Section 11.6 Avoidance, Minimization, and Mitigation Measures, pp 11-116 to 11-133, discusses the Mobility Implementation Plan (MIP), Transportation Demand Management Strategies (TDM), Smart Mobility, Agency Partnerships, Parking Strategies, Safety Strategies, and Transportation Mitigation measures. Where is the discussion on traffic congestion relief?

O-58-8

7. There are no recommendations, suggestions, or ideas related to the TR-2 mandate **“To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users.”** “All users” includes the 64% to 66% of the people in Bellevue that will use cars to get around (Table 11-19, p 11-75; Table 11-26, p 11-88; and Table 11-33, p 11-101) – let’s say two-thirds of all person trips in the city.

O-58-9

8. There are no capacity projects identified. Worse, the proposed policies appear to presume the long-planned N.E 6th Street Extension to 120th Avenue N.E. will be cancelled at a time when the DEIS clearly identifies the need for more motor vehicle capacity. ETA believes the N.E. 6th Street extension is Bellevue’s best opportunity to not only comply with TR-2 but comply with SEPA and mitigate impacts of the alternatives under consideration.

O-58-10

9. Mitigation Measure M-TR-1, p 11-130, suggests that the way to address the performance target gaps for System Intersection V/C ratios and Primary Vehicle Corridor speed in Wilburton is for Bellevue to consider:

- a. Building out the pedestrian and bicycle network,
- b. Promoting “Exceptional TDM” requirements to reduce SOV driving demand,
- c. Incorporating “Smart Mobility” solutions,
- d. Enacting parking code reforms.

O-58-11

10. ETA agrees that these actions would marginally impact drive-alone trips. However, none of these measures have shown to be *significant* reducers of the public’s preference to travel by car. The “TDM requirements” have a multi-decade history of city focus on the employees of large employers in downtown with marginal success. The other three are more recent ideas with very little data to support the underlying aspirational assumption that the traveling public in Bellevue will change travel modes (except the bicycle usage data, which shows a declining proportional usage from 2019-2021 – see attached data).

O-58-4 Comment noted.

O-58-5 Comment noted.

O-58-6 In Table 11-40, the impact is on the completeness of the pedestrian network, bicycle network and transit system, not the level of use of these networks. This is in line with the city’s performance targets in the Mobility Implementation Plan (MIP). The performance targets for vehicles using the roadway is based on use.

O-58-7 The process for identifying mitigation measures follows the process outlined in the MIP (see section 11.6.1 in the FEIS). This process is not specific to the project type but rather focuses on projects that address specific gaps in meeting performance targets.

O-58-8 This EIS is a document that discloses potential impacts of a non-project action. The city may elect to implement none, some or all of mitigation measures that are suggested in the EIS. The city may also choose to take other measures to address transportation impacts.

O-58-9 See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

O-58-10 Comment noted.

O-58-11 The EIS is a disclosure document, disclosing potential environmental impacts of the range of growth alternatives identified and analyzed in the EIS. It includes measures that can be taken to mitigate those impacts. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations.

O-58

COMMENT

RESPONSE

Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023
 11. In addition, M-TR-1 suggests that "Roadway or intersection capacity expansion should be a mitigation measure of "last resort" in PMA 1" (Wilburton, BelRed, and Downtown).

B. ETA's Recommendations

ETA Recommends:

1. The City issue a Supplemental DEIS for each project separately, with its own schedule. The combination of the 2024-2044 Comprehensive Plan Updates and the Wilburton Vision Implementation strategy into a single Draft Environmental Impact Statement has created a very complex and difficult document to effectively comment on and/or communicate about. This is massive and nearly incomprehensible. This process is NOT USER FRIENDLY.
2. Make a new BKRCast Travel Forecast Model run for the separate Wilburton supplemental DEIS which would include:
 - a. Add general purpose traffic as an assumed use to NE 6th St. overcrossing of I-405 to effectively use the new crossing.
 The existing portion of NE 6th St. from 112th Ave NE to the center of I-405 is constructed with a five-lane arterial cross section, obviously designed, and constructed for more than just HOV and Bus traffic. See the attached screenshot of NE 6th St. (City staff indicated that WSDOT directed the City to prohibit general purpose traffic from this crossing for the South Downtown Access Study and that position was used here. Why? WSDOT has not put that restriction on the 142nd Ave. SE direct access interchange in Eastgate nor the N.E. 128th Ave. direct access interchange in Kirkland.)
 The prohibition of general-purpose vehicles on the NE 6th St. crossing of I-405 significantly reduces the assigned traffic volume on the extension of NE 6th St. from 116th Ave. NE to 120th Ave. NE as reflected in the V/C model results of Alternative 3A shown in Table 11-39, p. 11-114.
 - b. Add a new crossing for all traffic including bicycles on NE 2nd St. between 112th Ave. NE and 116th Ave. NE. This is an obvious Downtown grid system missing link that would connect Downtown to Wilburton and needs to be included in the Wilburton buildout scenarios DEIS.
 - c. Include all road capacity projects that are identified in the current Capital Investment Program, the Transportation Facilities Plan, and the Transportation Improvement Program in the future year networks for the new BKRCast model run.
 - d. Use a population and employment estimate for the horizon year of 2044 in the BKRCast travel forecast model as well as the unknown (and unknowable) time frame of the "land use capacity build-out" option used in the DEIS BKRCast model.
 - e. Determine the maximum potential transportation system that could be constructed and determine the population and employment levels that transportation system can handle within the City's performance targets.
3. Aggressively expand the arterial grid system by, among other arterial gap infills, extending NE 6th St. as a general-purpose arterial from 110th Ave. NE to 120th Ave. NE. See the attached BelRed Transformation map of Capital Improvement Projects dated March 2, 2023, that shows NE 6th St. as a planned extension to 120th Ave. NE.
 Eliminate the proposed policy to protect Eastrail by prohibiting new general purpose road crossings of the trail – which proposed policy would prohibit the extension of NE 6th St. to 120th

O-58-12

O-58-12 Comment noted.

O-58-13

O-58-13 Comment noted. Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review, which explains that the EIS studies a range of alternatives to support the consideration of plans, policies, or programs. As noted in Common Response 1 and on DEIS Chapter 1, *Summary*, page 1-9, the non-project EIS does not provide a project level or site-specific detailed analysis of impacts associated with specific development proposals.

O-58-14

O-58-14 A. The NE 6th Street Over I-405 will be modeled as HOV/HOT and Transit. B. In the South Downtown Access Study, a new I-405 overpass at NE 2nd Street was ruled out. C. BKR includes all reasonably foreseeable vehicle capacity projects. D. See FEIS Appendix K for a transportation model using a 2044 land use scenario. E. A hypothetical maximum transportation system and the hypothetical capacity of that system to accommodate growth is not part of this analysis.

O-58-15

O-58-15 NE 6th Street exists and is planned as an HOV/HPT and transit arterial between 112th Ave NE and 116th Ave NE. It serves general purpose traffic between 110th Ave NE and 112th Ave NE. Any potential extension of NE 6th Street would accommodate general purpose traffic. Policy recommendations regarding a potential interface between NE 6th Street and Eastrail is to be determined following the FEIS, on recommendation from the Transportation Commission and the Planning Commission.

O-58

COMMENT

RESPONSE

Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023 Ave. NE. See Planning Commission Study Session Item 399 for the May 24, 2023, Planning Commission Meeting Agenda, Attachment A: Draft Comprehensive Plan Amendments to the Wilburton/N.E. 8th Street Subarea Plan, prepared by city staff. This proposed policy includes: **"Prohibit new general-purpose vehicular crossings across Eastrail"**. This significant Transportation Policy recommendation was buried in the Open Space and Natural Systems section of the planning staff recommendations.).

4. Add turn lanes, signal coordination, additional lanes, etc. to 116th Ave. NE within Wilburton and BelRed to alleviate all System Intersection and Primary Arterial Corridor significant impacts.
5. Add a new NE 2nd St. crossing of I-405 to 116th Ave. NE with bicycle extensions to Eastrail.
6. Complete Phase 4 of the 120th Avenue N.E. expansion project.
7. Remove the aggressive editorializing in the DEIS.
8. Identify policies to articulate proportional modal investments in accordance with DEIS mode shares.
9. Model the effects of full build-out of the approved I-405 Master Plan to determine this critical regional highway's ability to help reduce the overall increase in congestion Bellevue's continued growth is forecast to cause. Typical networks for future year evaluation only include the funded portions of long-range plans like the I-405 Master Plan.

C. ETA's Position

The ETA's long-standing position has been that traffic congestion is the problem, and we do have the power to reduce it and improve access and mobility for everyone. We recognize several established, well-documented realities:

1. Bellevue residents and employees have chosen the automobile as their preferred choice of mobility as reflected in the mode of travel data in the city's BKR travel forecast models (see the DEIS tables referenced in item A. 7 above and the attached 2018-2035 citywide mode split charts attached per the South Bellevue Access Study BKR model previously produced by ETA using city data).
2. The 2018 and 2020 bi-annual Bellevue Budget Surveys consistently show that 'traffic' and 'development impacts' are the top-of-mind issues in Bellevue.
3. Bicycle usage in Bellevue is at an extremely low level of about 0.25% of total trips (one out of more than 400 trips) per the City's bicycle count data from 2019-2021 and is decreasing as a portion of total trips. (See the attached ETA analysis of City of Bellevue actual ground count bicycle usage data. This DEIS estimates that bike usage will get up to 1% per the mode split tables referenced, an aspirational estimate with no City of Bellevue data basis.)
4. The I-405 Corridor is the transportation lifeline of Bellevue and its economy.
5. The I-405 Master Plan is incomplete. See attached ETA letter to Mayor Robinson, February 17, 2023 with attachments and WSDOT's program web site at <https://wsdot.wa.gov/construction-planning/major-projects/i-405sr-167-corridor-program>.
6. Significant traffic volume is diverted from I-405 to Bellevue's arterial streets due to severe congestion on I-405. Bellevue Way, 112th Ave. NE and SE, 116th Ave. NE and SE, and 148th Ave. NE and SE, plus connecting East-West arterials, are obvious recipients of this diverted traffic from the massively congested I-405 Corridor.
7. The state Growth Management Act requires cities to accept growth and provide a transportation system to accommodate that growth through the Concurrency requirement.

O-58-16 Comment noted.

O-58-17 The feasibility of a NE 2nd Street extension was analyzed in the South Downtown Access Study. It is not considered in this DEIS as it was determined to be incompatible with existing and planned development projects and environmentally sensitive areas. This project was not included in the 2022-2033 Transportation Facilities Plan. This project was not included in the 2024-2029 Transportation Improvement Program.

O-58-18 Comment noted.

O-58-19 The commenter requests that 'aggressive editorializing' of the DEIS be removed; however, no examples are provided, and further response cannot be provided.

O-58-20 Comment noted.

O-58-21 All alternatives use the same transportation network for the analysis which is the existing network plus new transportation investments adopted in the 2022-2033 Transportation Facilities Plan (TFP). Alternative 3 and the Preferred Alternative include the evaluation of the extension of NE 6th St as well. Evaluation of proposed and planned transportation projects by Bellevue or other agencies is evaluated through other processes.

O-58-22 Comment noted.

O-58-16
O-58-17
O-58-18
O-58-19
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O-58-21

O-58-22

O-58

COMMENT

RESPONSE

O-58-22

Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023

8. The city has decided to denigrate the automotive travel mode by eliminating its Concurrency Standard of V/C ratios through adoption of the Multimodal Level of Service (MMLoS) "targets" and the Mobility Implementation Plan.
9. The ridership of Sound Transit (ST) light rail (opening in 2025?) and Bus Rapid Transit systems and King County Metro's bus transit system have historically stagnated at about 5-6% of total daily trips and is projected to remain so when Eastrail is mature. (ST projects that about 80% of the projected 45,000 Eastrail daily riders are already taking the bus (e.g., ST's Route 550 between Downtown Bellevue and Downtown Seattle will be eliminated and ST's Route 554 between Issaquah and Downtown Seattle will be truncated at Mercer Island).
10. The way we reduce congestion is to build highway, intersection, and arterial capacity projects at strategic bottleneck locations in coordination with the population and employment growth we are experiencing.
11. The interconnectability of the Arterial grid system is fundamental to an effective street system. We need all the grid system gaps to be constructed.
12. The City Council recognizes the importance of accelerating the reduction of congestion as articulated in the unanimously approved Comprehensive Plan Policy TR 2.

Thank you for the opportunity to comment on this important transportation planning document.

Sincerely,

Victor H. Bishop, P.E.,
 Legislative Chair,
 Eastside Transportation Association
 (425) 518-3343
vicbishop@earthlink.net

Attachments (attached separately to the email transmittal of this letter as pdf files):

1. ETA's Bicycle Use Data in Bellevue based on city data
2. ETA's Trends in Bicycle Use in Bellevue
3. NE 6th St., 112th Ave. NE to center of I-405, Google Maps screenshot, June 9, 2023
4. BelRed Transformation map showing NE 6th St. assumed to be extended to 120th Ave. NE
5. ETA's Citywide Mode split Chart
6. ETA's I-405 Master Plan project lists:
 - a. ETA letter to Mayor Robinson and City Council, Feb. 23, 2023, I-405 unfunded project lists
 - b. Full I-405 Unfunded Project list.
 - c. I-405 Unfunded Project list of projects in Bellevue.
 - d. Summary of Unfunded I-405 projects by Legislative District.

References:

1. Capital Investment Program
2. Transportation Facilities Plan
3. Transportation Improvement Program
4. 2018 Bellevue Budget Survey and 2020 Bellevue Budget Survey

O-58

COMMENT

RESPONSE



Dedicated to improving our quality of life and environment by reducing congestion through increased mobility.
www.eastsidetransportation.org

February 17, 2023

Mayor Lynn Robinson
Bellevue City Council

Dear Mayor Robinson and Council Members,

The Eastside Transportation Association (ETA) encourages you to request our legislative delegation in the 41st and 48th Legislative Districts to make a significant investment in the I-405 corridor in the 2023-2025 Washington State Transportation Budget in this legislative session. Given the enormity of the need, ETA recommends you request the Legislature add at least an additional \$800 million for I-405 capacity projects over the next six years. These investments should help restore the economic vitality of King County's Eastside cities, which have been significantly impacted by workers not returning to urban centers.

The ETA recommends these high priority projects for inclusion in any 2023 Transportation Funding package adopted by the 2023 Legislature. We have identified four (4) projects (See adjacent map) as the immediate next increment to finish the I-405 Master Plan. The first three of these projects are fully within the City of Bellevue and the 41st and 48th Legislative Districts. The 4th project on the adjacent map is an accumulation of ten (10) High Priority Auxiliary Lane Projects. Two of these projects are within the City of Bellevue and the 41st and 48th Legislative Districts.

ETA 2023 Priority Projects



Overall, there are 25 unfunded projects worth \$11.9 Billion in the I-405 Corridor (see attached Full I-405 Project List) included in PSRC's Regional 2050 Transportation Plan that are scheduled for construction in the next decades. **Eleven (11) of these projects worth \$5.2 Billion are wholly or partially within Bellevue and the 41st/48th Legislative Districts.** ETA

O-58

COMMENT

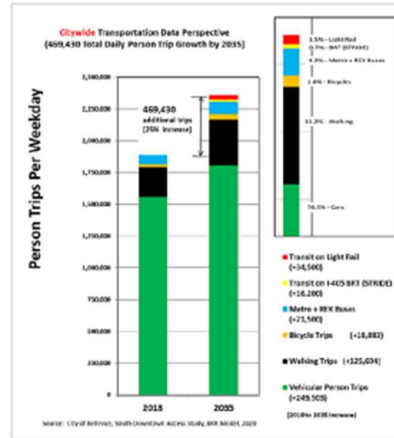
RESPONSE

Eastside Transportation Association

has compiled similar project lists for all seven legislative districts and six cities that have portions of the I-405 Corridor within them (see attached Summary by Legislative District and City).

For your information, existing and travel forecast projections predict over 76% of all daily person trips in East King County are and will be by automobile. The next largest group (mode) are pedestrians at 12-15%; then transit at 6-8% and finally bicycles at under 2%. Both the Puget Sound Regional Council (PSRC) and the City of Bellevue (source of adjacent graph) travel forecasts support this data.

The PSRC recently adopted a new Regional 2050 Transportation Plan (May 28, 2022) which relies heavily on the Approved I-405 Master Plan (2002), endorsed by 31 jurisdictions including all cities in the corridor. Every city, chamber of commerce, and several state, county, port, and transit agencies in the corridor endorse the completion of the I-405 Master Plan.



The ETA is a private sector non-profit organization dedicated to an improved highway system as an integral part of the multimodal transportation system that safely and efficiently moves people, goods, and services. We understand that the I-405 corridor is the backbone of the entire transportation system in East King County. About one million people travel on I-405 every weekday. The announced and projected explosive growth of jobs demands a clear understanding of how people travel.

I stand ready to discuss this data at your convenience. I encourage you to think about the 1 million people who daily use the I-405 corridor, many of whom are frustrated by the daily 4-6 hours of I-405 congestion.

Thank you for your consideration.

Victor H. Bishop, P.E.
 Chair, ETA Legislative Committee
 Eastside Transportation Association
vcbishop@earthlink.net
 (425) 518-3343

Eastside Transportation Association, PO Box 50621, Bellevue, Washington 98015

O-58

COMMENT

RESPONSE

Bicycling in Bellevue- What the Data Shows

Oct. 18, 2022, Victor H. Bishop, P.E,

Bicycling in Bellevue represented about one quarter of one percent (0.25%) of the daily trips in Bellevue in 2019-2020 (4,500/day) and has been reduced by about 26% by the pandemic.

The City of Bellevue has a robust bicycle counting program developed by the Transportation Department in 2018-19. The city has 14 locations on city streets and collects or collaborates with WSDOT to collect bike data on the three regional trails in Bellevue on I-90, SR-520 and the EasTrail. The city locations were implemented in August 2019 while the regional trail count locations have been collecting data for decades.

Data is collected at each location using an Eco-Counter system that provides electronic bike data by direction accumulated every 15 minutes 24 hours a day, every day of the year. The city now has about 3 years of detailed bicycle use data at 14 reasonably representative locations around the city on multiple types of city streets plus the three regional trails.

The city also maintains a vehicle count program that provides data for traffic volumes on the 14 street locations where the bicycle data is collected. The adjacent map shows the 17 locations with the 2019-2020 average weekday bicycle data and the comparable annual average weekday vehicle data at each location.



Summary of Bicycle and Vehicle counts at bicycle count stations

Location	Bicycles	Vehicles	People in Vehicles @ 1.23 ppc	Total People	% of People on Bikes
City Streets	701	156,300	192,249	192,950	0.36%
Eastrail	86	0	-	86	
SR 520 Trail	190	147,720	181,606	181,886	0.10%
I-90 Trail	444	181,920	223,762	224,206	0.20%
Total	1,421	485,940	597,706	599,127	0.24%

The August 2019-April 2020 data is summarized for these locations in the Table. There was an average of 701 bicycles per day counted at the 14 city street locations and 720 bicycles per day

at the three regional trails. At the same time there were 156,249 vehicles counted on the city streets, but significantly more on I-90 and SR 520. The vehicles counted were converted to people using a factor of 1.23 people per car.

O-58

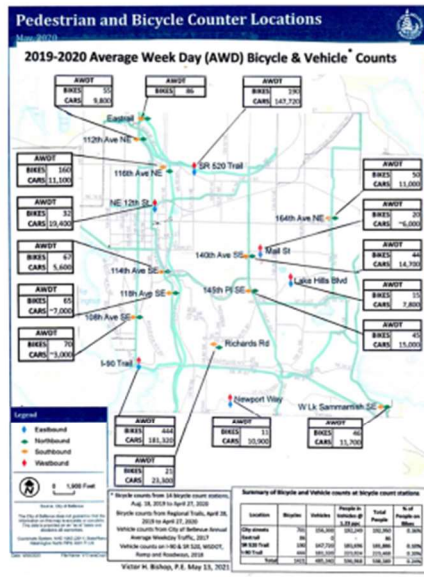
COMMENT

RESPONSE

Stated as a portion of the person trips at these 17 locations, **bicycle trips represented 0.24% of the bicycle plus vehicle person trips (excluding pedestrians and transit riders) in 2019-2020 (pre-pandemic).**

When applied to citywide travel, the bicycle portion translates to about **4,500 daily bike trips on an average weekday¹**

The calendar year 2021 bicycle data totaled 1052 bicycles at the 17 locations on an average weekday, **a reduction of 26% from the pre-pandemic data.**

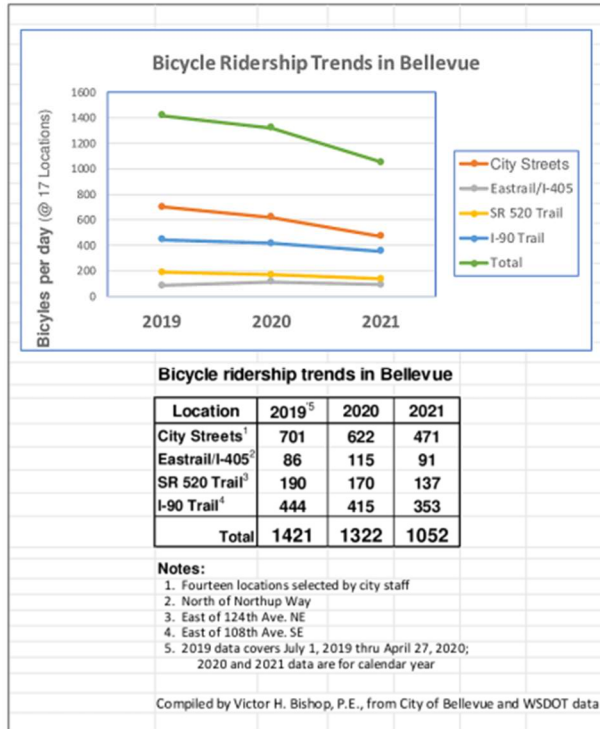


¹ The city uses its Bellevue Kirkland Redmond (BKR) Travel Forecast Model to evaluate alternative build scenarios of development growth and infrastructure investments. In 2020 the city used the BKR model to evaluate alternatives for the South Downtown Access Study. Bellevue city staff used 2018 data as the base year for the analysis. In 2018 there were an estimated 1,889,824 daily person trips on an average weekday. Using the 0.24% factor from the bicycle data results in about 4,500 bicycle trips daily on the streets and trails on an average weekday pre-pandemic.

O-58

COMMENT

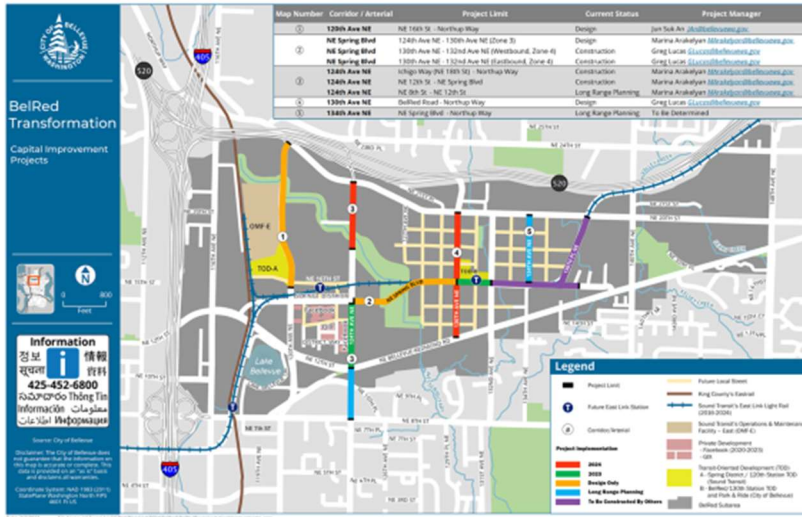
RESPONSE



O-58

COMMENT

RESPONSE



O-59

COMMENT

RESPONSE

O-59-1 See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*. This document is an appendix that relates to DEIS Chapter 3, *Land Use Patterns and Urban Form*. 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, including the preferred alternative, at the end of DEIS Appendix B.



June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS

Dear Mr. Pittman:

We are the owners of nine parcels of land, totaling about 12 acres, all located immediately southeast of the I-90 / I-405 intersection in Factoria, and we are writing to provide comments on the Draft Environmental Impact Statement ("DEIS") prepared by the City of Bellevue ("City") for the Bellevue 2044 Comprehensive Plan Update. Our comments are as follows:

- We support Alternative 3 to be adopted as the Preferred Alternative in the FEIS. Alternative 3 provides the most flexibility in future uses in the City and supports the boldest vision for growth of housing and jobs in Bellevue. We further suggest the following:
 - There should be no GC zoning between Factoria Boulevard and I-405, north of SE 38th ST. This area is immediately next to where Sound Transit will ultimately construct a light rail station, and should therefore have high-density mixed use zoning.
 - All parcels inside the area bounded by Factoria Boulevard / SE 38th / I-405 / I-90 – because of their proximity to the future light rail station, should have higher density zoning than for properties south of SE 38th or east of Factoria Boulevard, due to proximity to future rail. In Alternative 3, this would mean designating all such parcels MU-H-2.
- As the DEIS notes, Factoria is the only Mixed Use Center in Bellevue that does not provide for mixed-use development. Our site totals about 12 acres immediately north of the Marketplace at Factoria and is suitable for a wide range of uses. In order to promote housing, jobs and place-making in Factoria, the Comprehensive Plan should support the widest possible range of allowable uses in this Mixed Use Center, including our properties.

777 108th Ave NE, Suite 2150
Bellevue, WA 98004

Phone: 425-455-8100
Fax: 425-455-8165

O-59-1

O-59

COMMENT

RESPONSE

O-59-2

- ST4 targets high-capacity transit service to Factoria and points east on I-90. The DEIS should consider ways to prepare the future land use in Factoria for this critical new regional transportation connection. Development in the core of Factoria that will be served by regional light rail should reflect the same scale and density as seen in Bel-Red and Wilburton.

O-59-2 The FEIS studies a preferred alternative that includes mixed use in the area next to I-90. The specific route of a new line and the station location has not yet been determined and so specific station area planning is not included in this analysis.

O-59-3

- Future implementation of the new Comprehensive Plan should be discussed in the DEIS. Bellevue's land use planning system has historically been resistant to change on the micro level. Rezones are challenging without a foundation being laid in an area-wide update to the Comprehensive Plan. This makes it difficult for land uses in the City to evolve and adapt to changing circumstances. The Comprehensive Plan should create a process to accommodate such zoning changes and the DEIS should review alternative paths toward this end.

O-59-3 See Common Response 19 Zoning Details.

O-59-4

- The "air quality buffers" along pollution-generating arterials referred to in the DEIS should be eliminated. The logical location for density in the City is near arterials and transit corridors. A new regulation that limits future density in the very location where it belongs will just undermine the City's housing and jobs goals.

O-59-4 See Common Response 8 Air Quality/GHG.

We appreciate the opportunity to provide these comments.

Sincerely,

O-60

COMMENT

RESPONSE

O-60	Hello Bellevue Staff. I'm submitting this comment on behalf of the People for Climate Action Bellevue Chapter's leadership team.	O-60-1	See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.
O-60-1	In general, we feel the that the Bellevue Comp Plan DEIS is quite light in addressing the city's commitment to cut greenhouse gas emissions 50% by 2030 and 80% by 2050. A 20-year comprehensive plan needs to be pretty detailed and aggressive for the city to hit those commitments. Consequently, PCA Bellevue looks forward to discussions with city staff in the months ahead in developing such climate related details.	O-60-2	See Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.
O-60-3	Through the summer and fall, we suggest that the city staff be watching for further climate related guidance recommendations that will be coming from the WA Dept. of Commerce later this year. FYI, we're informed by Commerce staff that, due to the passage of HB1181 in the recent legislative session, detailed guidelines, including a long checklist of approximately 300 climate related topics for possible inclusion in a city comp plan, is somewhat delayed, but will be issued by the end of this year.	O-60-3	See Common Response 12 Impacts of Climate Change.
O-60-2	In the meantime, with the understanding that we see the need for a great deal more expansion of the comp plan relating to climate change mitigation and resilience, we offer the following comments on the DEIS.	O-60-4	Comment noted.
O-60-4	1. ALTERNATIVES:	O-60-5	Comment noted.
O-60-5	a. Alternative 3 appears to be the most climate friendly option because:	O-60-6	Comment noted.
O-60-6	i. It more broadly distributes high density growth, rather than concentrating such growth primarily downtown.	O-60-7	Comment noted.
O-60-6	ii. It allows greater Mixed-Use Areas with residential and commercial density around major transit stops to make it easier for more people to reduce their car trips.	O-60-8	See Common Response 2 Tree Canopy. Common Response 12 Impacts of Climate Change. See Common Response 15 Climate Change and State Planning Framework.
O-60-7	iii. It allows greater focus on distributed locations for small convenience commercial developments with a goal of more walkable neighborhoods and the reduced use of cars.		
O-60-7	iv. It allows more types of lower cost housing options distributed broadly across the city, with a goal of enabling more people who work in Bellevue to live in Bellevue, and thereby reduce long distance commuting.		
O-60-8	b. Growth must be done wisely and in parallel with other equally important goals - reducing greenhouse gas emissions by 50% by 2030; increasing our tree canopy to 40% city wide; maintaining our excellent quality of life in		

O-60	COMMENT	RESPONSE
	<p>Bellevue. A summary needs to be provided stating that Alternative 3 can meet these other goals. At adoption, measures and accountabilities should be in place to monitor progress.</p>	<p>O-60-9 Under the Growth Management Act, growth is monitored by the county, regional and state bodies every 5 years.</p>
O-60-9	<p>c. The buildout of Alternative 3 should be done in a monitored and managed fashion. Growth data should be updated every 2-3 years. Building growth rates could be managed through new building size caps, and density caps, in concert with incentivization of near zero carbon footprint remodeling of existing buildings, and with the city's development of zero emissions transportation alternatives.</p>	<p>O-60-10 Building and energy codes, and project-specific development standards, are outside the scope of the FEIS. The FEIS provides environmental analysis consistent with SEPA, but the EIS itself is not a policy document. However, the Comprehensive Plan is a policy document and proposed policies addressing building electrification, green building performance standards, and electric vehicles are under review as part of the current Comprehensive Plan Periodic Update. This is in keeping with Bellevue's Environmental Stewardship Plan, which establishes targets, and articulates strategies for achieving those targets, related to decarbonization, building electrification, green building performance standards, and electric vehicles, among other sustainability topics. See Common Response 8 Air Quality/GHG.</p>
O-60-10	<p>2. AIR QUALITY AND GREENHOUSE GAS EMISSIONS: a. Reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed in the Comp Plan. Each Alternative should be analyzed on its ability to meet the goal. No plan should be adopted without full confidence that the goal will be met. b. Growth must not come at the expense of missing our GHG emissions reduction targets. We must do both. Growing this rapidly AND meeting GHG emissions targets can only be achieved if the Comprehensive Plan includes concrete plans/mitigations, policies and development regulations that require sustainable growth practices. Alternative 3 must do BOTH and include mitigations and policies that require all growth (new builds, redevelopment, transportation, and all infrastructure) to be built and operated with ultra low greenhouse gas emissions practices</p>	<p>O-60-11 The scope of the DEIS was to determine the environmental impacts of future growth under each of the alternatives studied in the EIS, and to identify potential mitigation for the environmental impacts disclosed in the EIS. Consideration of how best to meet the increase in electricity demand associated with future growth will be evaluated at the time growth under the Preferred Alternative is implemented.</p>
O-60-12	<p>c. New or redeveloped buildings should: i. be all electric (i.e., no new gas hookups), ii. be required to meet high efficiency performance standards such as LEED Platinum certification or better, iii. include EV charging stations, and iv. have appropriate waste management systems including composting and recycling, d. Affordable housing, mitigations should meet the same GHG emissions building standards as other buildings.</p>	<p>O-60-12 Building and energy codes, and project-specific development standards, are outside the scope of the FEIS. The FEIS provides environmental analysis consistent with SEPA, but the EIS itself is not a policy document. However, the Comprehensive Plan is a policy document and proposed policies addressing building electrification, green building performance standards, and electric vehicles are under review as part of the current Comprehensive Plan Periodic Update. See Common Response 8 Air Quality/GHG.</p>
O-60-11	<p>e. With more electrification, mitigations need to include requirements that our utility company offer programs to modulate peak electricity loads such variable rate schedules and "Demand Response." For example: i. The City should require PSE to create an hourly time variable rate schedule that would incent people to charge EVs and use other appliances at low demand times of the day. ii. The City should require PSE to provide a rigorous "Demand Response"</p>	

O-60	COMMENT	RESPONSE
	<p>program whereby they could remotely turn off water heaters, refrigerators, and other non-essential appliances at peak demand hours of the day to lessen peak loads on the grid.</p>	<p>O-60-13 See Common Response 2 Tree Canopy. See Common Response 3 Water Quality, which describes future site-specific project analyses and regulations.</p>
O-60-13	<p>3. LAND USE PATTERNS AND URBAN FORM a. Mitigation of heat island and runoff impacts must be required for Mixed Use Areas, large square footage developments (commercial or public), and other high-density development. Mitigation regulations should include highly reflecting or green planted roofs , rainwater detention to slow stormwater runoff or rainwater capture for use in irrigation, shade and shade tree scaping, pavement minimization, pervious pavement where pavement is allowed, and underground or multi story parking structures where vehicle parking is needed so as to minimize paved land.</p>	<p>O-60-14 See Common Response 2 Tree Canopy.</p>
O-60-14	<p>b. All roads could be lidded with tree scaping. c. Tree canopy analysis was excluded from the DEIS. This is unacceptable. The canopy impact needs to be studied in the comp plan and must explicitly include plans/mitigations, policies and development regulations that require and ensure 40% tree canopy throughout the City. d. It is urgent to maintain our cooling tree canopy by getting better tree preservation ordinances in place asap, by requiring minimum tree canopy requirements for new and redevelopments and by preserving and protecting, in perpetuity, the current remaining trees and forested areas within the City.</p>	<p>O-60-15 See Common Response 2 Tree Canopy. See Common Response 7 Parks and Open Space.</p>
O-60-15	<p>e. Tree preservation and canopy improvements need to be incorporated into development regulations. Developers should have to show that they've designed their buildings to keep the best (largest, oldest) trees on the property, and they should be required to replant and maintain trees to bring every lot up to a minimum tree canopy goal. f. Land needs to be identified in the plan for new parks, protected forests, and beaches. Zoning regulations should be developed to set new areas aside for these uses and to ensure our existing parklands and open spaces are not converted to residential or commercial uses.</p>	<p>O-60-16 Comment noted.</p> <p>O-60-17 The commenter suggests that treescaping should be used as a mitigation strategy for noise, air quality, and aesthetics impacts. DEIS Chapter 6, <i>Aesthetics</i>, Page 6-4 acknowledges that street trees are present throughout the study area, primarily on 116th Avenue NE, 120th Avenue NE, NE 12th Street, and NE 4th Street. Page 6-62 identifies Other Proposed Mitigation Measures including that the city could require for vegetation on major streets to screen development and enhance the pedestrian experience. DEIS Appendix E, <i>Plant and Animals Technical Memorandum</i>, acknowledges that Bellevue's tree canopy is a critical environmental asset and central to the vision of a 'City in a Park.' Bellevue's Environmental Stewardship Plan Action N.1.1 calls for a comprehensive review and update of provisions in the Land Use Code and City Code for tree preservation, retention, replacement, and protection during construction. Amendments to Bellevue's Land Use Code and City Code may update tree preservation, retention, replacement, and protection provisions to better support citywide tree canopy goals. DEIS Appendix E further states that most of the housing and job capacity identified in the Comprehensive Plan Periodic Update alternatives is in areas with little tree canopy, including Mixed Use Centers, Neighborhood Centers, or along transportation corridors. The city will have the opportunity to require developers to add trees in these areas through the separate non-project actions addressing</p>
O-60-16	<p>g. All current forests in Bellevue should be set aside in perpetuity as public forests. These forests should be managed to maximize their carbon sequestration services as well as for public access. h. Incentivize the development of remote work hubs in Mixed Use centers to reduce the amount of office space required and distribute workers throughout the City. This will increase the viability of small businesses in the Mixed Use areas.</p>	
O-60-17	<p>4. NOISE AND AESTHETICS</p>	

O-60

COMMENT

RESPONSE

- ~ ~ ~ | a. Dense tree scaping should be used as a traffic noise, air quality and aesthetics mitigation strategy.
- 5. TRANSPORTATION
- ~ ~ ~ | a. Mitigations must include intensive intercity traffic congestion management.
- ~ ~ ~ | b. Mitigations must include a major investment in intercity mass transit to reduce VMT and GHG emissions.
- O-60-18 | c. Mitigations should include tax or other disincentives to drive gas cars in Bellevue.
- ~ ~ ~ | d. Mitigate and manage congestion through programs in partnership with large businesses. For example, move commuters to mass transit by via high parking fees/taxes or parking restrictions based on license plate numbers (odd or even days), incent businesses to allow remote work, promote free use of public transit passes, etc.

specific city amendments to development regulations. These same legislative processes will provide an opportunity to consider amendments to development regulations to require clustered development and preservation of large trees.

The effectiveness of vegetation in the absorption of sound was analyzed in the California Department of Transportation (CALTRANS) document Technical Noise Supplement to the Traffic Noise Analysis Protocol. The document states that, despite a general perception of its effectiveness in lowering noise levels, shielding by shrubbery and trees typically used in landscaping along highways provides an imperceptible amount of noise reduction (less than 1 dB).[1]

O-60-18 The EIS is primarily a document to disclose potential environmental impacts of the city's non-project action. The identified mitigation measures are actions the city can take to reduce the impact of the potential environmental impacts. The actions have varying degrees of impact on traffic and other environmental concerns. It is possible for the city to choose to include some, all, or none of these measures in the update to the Comprehensive Plan. It is also possible for the city to take other actions to reduce the impact on traffic and other environmental concerns.

O-61

COMMENT

RESPONSE

O-61-1 Comment noted.



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Brent Droze
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June 12, 2023

VIA USPS AND EMAIL

City of Bellevue Development Services Department
Attn: Rebecca Horner, Land Use Director and SEPA Responsible Official
Reilly Pittman, City of Bellevue Environmental Planning Manager
Elizabeth Stead, Land Use Director
450 110th Avenue NE
Bellevue, WA 98004
CompPlan2044EIS@bellevuewa.gov

Re: Bellevue College's Comments Regarding the Draft Environmental Impact Statement (the "DEIS") for the City of Bellevue's Proposed 2024-2044 Comprehensive Plan Periodic Update (the "Comprehensive Plan Update")

To whom it may concern:

These comments are provided to the City on behalf of this firm's client, Bellevue College, a public institution of higher education authorized under Chapter 28B.50 of the Revised Code of Washington ("Bellevue College"). As you are likely aware, Bellevue College's campus is located on approximately 100 acres in the City's Eastgate subarea. The future land use map in the City's current Comprehensive Plan classifies Bellevue College's campus as a Public Facility/Single Family-High Density land use ("PF/SF-H," or the "Current Comprehensive Plan Designation"). The City's current zoning map depicts the Bellevue College campus as within a Single-Family Residential 5-acre land use district (the "Current Zoning").

Bellevue College strongly supports the City's proposed redesignation of its campus from the current PF/SF-H designation to an "Institutional" designation in the proposed Comprehensive Plan Update. Bellevue College agrees with the City's acknowledgment in the DEIS that Bellevue College's campus is "not expected to redevelop as single-family" and, instead, should be developed in the future as an "Institutional" land use that contemplates development of "classroom[s], office[s], and dormitories in a campus setting" on the Bellevue College campus. We encourage the City, in the Final Environmental Impact Statement ("FEIS") and the Comprehensive Plan Update, to adopt the proposed reclassification of the Bellevue College campus to an Institutional land use as contemplated in the DEIS.

DWT.COM

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O-61

COMMENT

RESPONSE

Bellevue College Comments on DEIS for Comprehensive Plan Update
 June 12, 2023
 Page 2

O-61-2 Zoning changes must be in alignment with the Comprehensive Plan. Creating an institutional future land use category is the first step in complying with the cited state regulations. See Common Response 19 Zoning Details.

O-61-2 *Note, however, that this redesignation is just one of several steps the City should take, as soon as possible, to avoid hindering future development of Bellevue College's campus consistent with the College's educational purpose and mission.* As you may be aware, the City has a legal duty to accommodate regional Essential Public Facilities ("EPFs") like the campus pursuant to the Growth Management Act ("GMA"). The proposed Comprehensive Plan redesignation is a step in the right direction, of course. Nevertheless, we and our client remain deeply concerned that the Current Zoning does not reflect the institutional uses present or planned on the Bellevue College campus. As you know, the GMA requires that the City adopt development regulations to implement the policy decisions made in any comprehensive plan update. *See, e.g.,* RCW 36.70A.040(3). We thus urge the City to take prompt action to also amend the City's Land Use Code ("LUC") to allow for the further development of this important EPF in the City. This should be done concurrently with—or, alternatively, promptly after—the City adopts the Comprehensive Plan Update.

O-61-3 The City acknowledges the Bellevue College comment regarding the importance of establishing new development regulations for institutional use standards. Following the EIS process, the city will develop specific edits to the Comprehensive Plan Land Use Map, Comprehensive Plan, and Land Use Code that will be the subject of public meetings and public hearings by the Planning Commission and City Council. See Common Response 19 Zoning Details.

O-61-3 In our review of the current LUC, we find no land use district that seems to implement an Institutional future land use designation under the City's Comprehensive Plan. So, to implement the Comprehensive Plan Update's redesignation of the Bellevue College campus as an Institutional land use, the City will not only need to rezone the campus on the City's zoning map, but also craft new development regulations to permit future Institutional development across the campus. These implementing actions should be reviewed as soon as possible to avoid further delay to final City action in furtherance of its obligation to accommodate this important EPF. Ideally, the City would initiate an expedited rezone of the Bellevue College campus following the City's adoption of the Comprehensive Plan Update, if it is not done concurrently.¹

Time is of the essence for Bellevue College, as its campus needs to be rezoned as soon as possible. As you may be aware, a permitting agreement signed by the City and Bellevue College in 1985 (the "Permitting Agreement") broadly permitted institutional development on the campus. But the Permitting Agreement was recently terminated, leaving the campus subject to the underlying residential zoning regulations that are obviously a poor fit for the long-term development of an EPF like a college campus. The lack of Institutional zoning, together with the termination of the Permitting Agreement hinder Bellevue College's ability to develop facilities on its campus necessary to accommodate its growing student body and expanding educational mission. The City can remedy this problem by promptly processing a rezone and adopting Institutional development standards for the College.

¹ Bellevue College encourages the City, in its Comprehensive Plan Update or as soon as possible thereafter, to consider discussion of the baseline standards that should govern development within the LUC's new Institutional land use district that will be promulgated following the adoption of the Comprehensive Plan Update. In addition, the FEIS for the Comprehensive Plan Update should consider the types of development that could occur in the forthcoming Institutional land use district and study the potential environmental impacts that will result from a rezone of the Bellevue College campus from R-5 to Institutional.

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Bellevue College Comments on DEIS for Comprehensive Plan Update
June 12, 2023
Page 3

We appreciate your consideration of these comments. Please feel free to contact the undersigned with any comments or questions related to the issues raised in this comment letter.

Sincerely,

Davis Wright Tremaine LLP



Clayton Graham / Brent Droze

cc: Client

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O-62

COMMENT

RESPONSE

O-62-1 Comment noted.

MAX CAPITAL LLC & ALCO INVESTMENT CO
 14510 NE 20TH STREET – SUITE 205
 BELLEVUE, WA 98007

June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: *Bellevue 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation DEIS
 Comments for 411 116th Avenue NE*

Dear Director Stead and Mr. Pittman,

We appreciate the considerable time and work that has clearly gone into the City of Bellevue’s (the “City”) Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation (“DEIS”). The DEIS represents a very promising leap toward our shared goal of building an equitable, transit-oriented, affordable, sustainable and economically healthy community.

Our group owns the nearly 4.5-acre Auto Nation Ford site located at 411 116th Avenue NE (the “Site”). We believe the Site could provide a significant opportunity for redevelopment that embodies the City’s vision for a dense, multimodal and sustainable Wilburton, complementing Downtown and our community’s many recent investments in transit and other infrastructure if zoned appropriately. We support the identified MU-H-3 designation for the site in Alternative 3, and request that designation be carried forward to the FEIS Preferred Alternative, along with addressing the other topics we’ve identified in this letter.

I. Background

The Site is uniquely suited to dense, mixed-use, highrise development that will support a transit-oriented future for Bellevue. First, it is exceptionally well connected. The Site is adjacent to I-405 and NE 4th Street, within a quarter mile of both the Downtown and Wilburton Link light rail stations, and just one block from the City’s future Grand Connection bridge and Eastrail. Located just across the NE 4th Street overpass from Downtown, the Site provides both a transition from Downtown that integrates seamlessly with the City’s skyline and a gateway to Wilburton as a new, dense neighborhood. Finally, the considerable size of the Site can lend itself to master planning that will yield a unique identity with open spaces, pedestrian connections and a mix of land use types that activate the streetscape and build community.

We have completed a test fit of potential future development that has informed these comments, and that study reveals the site could deliver some 1,500 housing units, several hundred thousand square feet of commercial development, and an overall sustainable, smart and transit-oriented configuration. Our initial test fit is attached as Exhibit A, and incorporated herein by this reference.

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 PHONE: 425-746-1500

O-62-1

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Of course, realizing this development opportunity for the City depends upon the future zoning and development standards.

II. DEIS Comments

1. To maximize efficient use of land, opportunity for affordable housing, and transit-oriented development, the City's Preferred Alternative should build upon DEIS Alternative 3.

We appreciate the City's recognition in all of the DEIS action alternatives that the area between NE 8th Street on the north, NE 4th Street on the south, and 116th to the east is best positioned for the tallest, 450', heights for Wilburton. We agree with this conclusion. This area is closest to Downtown, and will be directly linked in the future by the Grand Connection, so it deserves the highest densities.

Although all action alternatives propose 450' heights for this area, we support the City advancing Alternative 3 because of the proposed "Mixed Use" versus "Office / Residential" designation. The City should provide the greatest flexibility in uses possible to ensure that development can occur, and the "Mixed Use" designation achieves this.

We caution being overly prescriptive with use designations. Instead, we encourage the City to study and devise a land use code that sets out the building forms necessary and achievable for a variety of uses, and to allow the market to dictate what uses are needed at any given time. On our Site in particular, we envision a mix of uses in both separate structures and mixed-use structures, and we encourage you to study a wide variety of uses as part of the FEIS Preferred Alternative.

2. Development standards must support the density envisioned.

The DEIS notes that "development standards in the Wilburton study area would likely be informed by development standards established in other subareas." DEIS 1-22. We urge the City to look beyond the standards established elsewhere and avoid standards that advance form over function, efficiency, and cost. The FEIS must include more detail about the range of development standards contemplated for Wilburton to support the heights identified, including the assumed Floor Area Ratio limits. The Preferred Alternative should include study of up to 8 FAR for commercial use and unlimited residential FAR for the MU-H-3 designation. Our attached design study supplies additional specific comments on reasonable development standards that should be studied on page 9.

3. Instead of losing density to road buffers, the FEIS should acknowledge and embrace market-driven approaches to mitigate air and noise pollution impacts.

The DEIS reasonably identifies a concern with air quality and noise associated with developing housing and other uses in freeway- and arterial-dense neighborhoods. *See, e.g.*, DEIS at 1-23 ("Reduce Exposure to Contaminated Sites and Traffic") and 1-28 ("Long-Term"); DEIS at 9-15. Although we question the appropriateness of using permitting thresholds for air quality in the DEIS

O-62-2 The Preferred Alternative studied in the FEIS includes a future land use designation of OR-H-3 on the site indicated. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*.

O-62-3 See Common Response 19 Zoning Details.

O-62-4 See Common Response 8 Air Quality.

O-62-2

O-62-3

O-62-4

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O-62-5 Analysis of specific parcels and changes to transportation routes is outside of the scope of the EIS. See Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

analysis as a basis for the City’s conclusion on significant impacts, we certainly acknowledge that air quality is a concern and we all want to have abundant fresh air where we live and work. *See, e.g.,* DEIS at 1-35 (recognizing Air Quality as an area of potentially significant unavoidable adverse impacts); 5-16 through 5-18; and chapter 8. Similarly, homes should be reasonably free of ambient noise.

For air quality, the City’s focus should be on realistic projections and appropriate mitigation measures. In the FEIS, the City should: (a) first account for the potential GHG reductions that will result from transportation mitigation measures like TMPs and transit-oriented development in measuring the expected air quality impact, and then (b) rely on the market to deliver technical solutions to HVAC design and indoor air quality filtration to mitigate concerns. Likewise, the City should focus on technical noise mitigation solutions. We are confident there are technical solutions to these issues and developers will implement these in a reasonable manner. Twenty-first century technologies provide cutting-edge ways to reduce exposure to traffic pollution and noise, whether by state-of-the-art, low-cost retrofits and electrification, alternative window materials, modern HVAC ventilation, filtration and air quality testing technologies, or other sustainability measures and best practices for the built environment. If developers do not address air quality and noise concerns voluntarily, then tenants would choose to live or work elsewhere, so this is an issue that the market will address without specific intervention or regulation by the City. We further caution against devising a one-size-fits-all technical approach to these issues because of the rapid pace of technological change, and because individual project circumstances are unique.

We also strongly oppose identifying any air quality or noise mitigation measures that rely on buffers and unnecessarily remove buildable land from the limited stock that can provide new housing and employment density. The DEIS contemplates, among other things, “land use buffers,” “roadside barriers,” and “limit[ing] residential uses within a certain distance of contaminated sites and freeways” as possible ways to mitigate the impacts of vehicle-borne air pollution and noise. *See, e.g.,* DEIS at 1-23, 1-28, 9-15 and Table 9-4. These strategies would remove buildable land from the City and limit development choices, thereby undermining the City’s housing and employment density goals, and they should be especially avoided where, as here, there are technical solutions available that will be implemented by the market anyway.

4. The FEIS should carry forward the progressive tools for traffic mitigation identified in the DEIS, but provide more detail.

We are strongly supportive of the measures identified in M-TR-1 for PPM1 (that includes Wilburton), which focuses on coordination with transit agencies, building out the pedestrian and bicycle infrastructure, and only identifies adding street capacity as a last resort. *See* DEIS 11-130. This approach should be carried forward to the FEIS. But, in order to bolster the adequacy of the analysis, the City should also provide more details on the identified mitigation measures – including identifying specific locations for additional bike and pedestrian infrastructure, identifying specific streets or corridors targeted for BRT expansion, and identifying specific intersections where improvements could be implemented (and where they cannot) along with identified impacts on development potential for adjacent properties.

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COMMENT

RESPONSE

O-62-6 The analysis of transportation projects is outside of the scope of the EIS. Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

O-62-6 We note there are some potential transportation impacts disclosed proximate to our Site, and additional detail should be provided in the FEIS on how the City intends to address these specific impacts. For instance, the vehicle travel speed performance target is not satisfied on NE 4th next to our Site. Figure 11-45. However, this deficiency is true today and in the No Action Alternative (see Figure 11-33), and stems from the fact that the road cannot be widened over the interstate. The City should confirm in the FEIS that this is a situation that can only be mitigated through programmatic and not physical solutions. Similarly, the DEIS discloses the intersection V/C ratio is exceeded for the NE 4th and 116th intersection under Alternative 3 (see Figure 11-46), but it is unclear from the analysis whether there are possible physical intersection improvements that could mitigate this condition, or if it too is constrained by the existing infrastructure and surrounding uses. This should be disclosed in the FEIS. Fundamentally, the FEIS should include robust analysis of the trade-offs, feasibility, and environmental impacts of road widening and intersection improvements in contrast with other available mitigation options.

O-62-7 See Common Response 4 Housing Alternatives.

O-62-7 **5. The FEIS should study ways to create affordable housing through incentive programs calibrated based on construction type, not through mandates that have been shown to stifle development.**

We appreciate the City's dedication to creating a mix of affordable, workforce and market rate housing, and the City's thoughtful discussion of housing impacts in the DEIS. See, e.g., DEIS at 1-26 ("Citywide Impacts"); Chapter 2, *passim*; Chapter 3 (in discussion of residential displacement); 7-38 through 7-39; 7-41. Abundant housing at all income levels to meet the needs of our community is a common goal. However, the FEIS must differentiate those housing policies that are shown to work in all economic conditions from those that have been shown to result in unintended consequences. Specifically, the Preferred Alternative should include incentive-based affordable housing systems where developers achieve density bonuses in exchange for constructing or paying an in-lieu fee for affordable housing, and should not contemplate mandatory affordability minimums that too often forestall new projects and work against housing goals.

O-62-8 See Response to O-62-7.

O-62-8 Mandatory affordability minimums, or inclusionary zoning mandates, have been implemented in other cities in recent years as one tool in the municipal toolbox for providing affordable housing. However, the FEIS should acknowledge what the data shows: inclusionary mandates result in unintended consequences such as losses in density and transit-oriented development. A recent study of Seattle's MHA program by New York University's Furman Center for Real Estate & Urban Policy found:

"new construction fell in the upzoned, affordability-mandated census blocks. Our quasi-experimental border design finds strong evidence of developers strategically siting projects away from MHA-zoned plots—despite their upzoning—and instead to nearby blocks and parcels not subject to the program's affordability requirements."¹

¹ Krimmel, Jacob and Betsy Wang. *Upzoning with Strings Attached: Evidence from Seattle's Affordable Housing Mandate*, https://furmancenter.org/files/publications/Upzoning_with_Strings_Attached_508.pdf, at 2.

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O-62-9 See Response to O-62-7.

O-62-10 The FEIS includes an analysis of inclusionary zoning mandates. See Common Response 4 Housing Alternatives.

O-62-11 See Common Response 16 Critical Areas.

O-62-9

A more tried and true method is *incentive zoning*, which has shown tangible results in Bellevue for decades. The critical difference between incentive zoning and mandatory affordability programs is that the mandatory model creates a “go-no-go” binary – if the mandated affordability is not economic, even with the upzone, then the site in question is likely to remain undeveloped or underdeveloped, with no resulting increase affordable or market-rate housing. By contrast, incentive zoning replaces the binary with an allowance for creativity – where an upzone with affordability is economic, the incentive will be seized. Where that combination is not economic, a lower density may be built, but at least the land won’t languish while it awaits a change in the City’s policy.

O-62-10

To be complete in its evaluation of alternatives, baseline assumptions and mitigation measures, the FEIS must acknowledge the effects of inclusionary zoning mandates in driving new housing away from sites where those programs are implemented and it should avoid this result by focusing on an incentive program for affordable housing production in the Preferred Alternative. An incentive-based program, especially one that is calibrated to make sense for different construction types and provide true incentives for development, is a powerful tool to create affordable housing and more housing overall.

6. The FEIS and Comprehensive Plan should support updates to Bellevue’s Critical Areas Ordinance.

The DEIS does not clearly disclose how Critical Area Ordinance (“CAO”) requirements influence its density and development assumptions. This is a clear analysis gap that must be filled in the FEIS.

Additionally, the FEIS analysis should study the trade-offs of eliminating or providing exemptions to the CAO in Wilburton, similar to the current structure for Downtown. We support such an exemption given Wilburton’s importance as a future urban neighborhood that may accommodate upwards of 25% of the City’s future growth.

O-62-11

Bellevue’s CAO rightfully protects many of our City’s most beloved features, like its streams, wetlands and critical habitats. However, it is outdated in several important ways that undermine the City’s climate, transportation and housing development goals. By way of example, perhaps the most troubling shortcoming of the current CAO is that the presence of a critical area or buffer *automatically* reduces the development potential of a lot, without any consideration for the actual risks or ecological values implicated. The current CAO contains a mathematical, mandatory density reduction on CAO parcels *without regard to whether the proposed project actually has any impact to the critical area, or whether it improves the critical area. See LUC 20.25H.045 (not permitting modification of formulae by critical areas report); see also LUC 20.20.010(13); 20.25L.030(9); 20.25P.060(7) (“Lot coverage is calculated after subtracting all critical areas and stream critical area buffers.”)*. This formulaic, inflexible loss of development capacity, without adjustment for qualitative factors, is categorically inapposite to the City’s density and sustainability goals. Even if a project were to demonstrably *improve* the environmental value or safety of an on-site or off-site critical area, the permitted density or envelope is still shrunk by formula. This can result in making a project non-viable regardless of its impacts or non-impacts, even if it had the potential to *improve* the environmental value of a critical area.

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O-62-12 Comment noted.

O-62-11

Due to the proximity of many streams and their buffers to new transit infrastructure and development centers, Bellevue is unfortunately full of instances where development capacity is lost by this rigid formula rather than retained through the use of creative architecture or critical area enhancement. On our site, for example, development may be reduced by the presence of an off-site portion of Sturtevant Creek that is within the WSDOT right-of-way and FHWA limited access zone, and therefore, is inaccessible for private mitigation. A development project could undoubtedly improve the creek conditions with off-site native plantings, upgraded stormwater systems and modern approaches to sustainability, but such a project should not also be penalized in available development capacity for improving onsite and offsite conditions.

Surely such results cannot be the City's intended policy outcome, so we look forward to working with you to update and improve the CAO or exempt Wilburton from its regulations altogether. Again, the Preferred Alternative should contemplate CAO updates, including a Wilburton-specific amendment or exemption during the forthcoming LUCA, so that outdated provisions of the CAO do not stymie the City's growth targets and policy goals.

III. Conclusion.

O-62-12

We appreciate the tremendous amount of time and effort that the City and its consultant team have clearly put into the DEIS, which is a remarkable and impressive body of work. We strongly support the MU-H-3 designation for our Site that is proposed in Alternative 3 and it should be carried forward in the FEIS Preferred Alternative.

We look forward to continuing to engage with you through the FEIS, Comprehensive Planning and LUCA processes, and your many other efforts to build a sustainable, affordable and economically healthy Bellevue.

Please do not hesitate to contact us if you have any questions or if there is any further support we can provide.

All the best,



Neal Mulnick
On behalf of Max Capital LLC and Alco Investment Co

cc: Emil King, Planning Director
Janet Shull, Strategic Planning Manager
Justin Panganiban, Senior Urban Designer/Planner
Abigail P. DeWeese, HCMP

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Bridges Vision and Development Priorities

Vision

To ensure site development will respond proactively to Bellevue's long term housing needs and anticipated job growth, and to allow engaging and supportive design opportunities for exterior and interior environments.

The owner has developed the site concept herein that meets this vision, based on the concept of "Bridges."

Development Priorities

- 1. **Flexible Mixed-Use**
Contribute to a vibrant, high-quality, mixed-use Wilburton neighborhood
- 2. **High Density Development**
Achieve High Density Development Complementary to Bellevue's Downtown and Further Progress Toward Growth Targets
- 3. **Grand Connection Destination**
Provide a Destination Near the Terminus of the Grand Connection, and Proximity to both Light Rail and Eastlink.

Site

The 4.5-acre property is situated at the gateway between Downtown Bellevue and the Wilburton neighborhood, with 1400 and Sparrows Creek to the west, NE 4th Street to the South, 116th Avenue NE to the east, future Grand Connection to the north, and Eastlink one block to the east. Perhaps no site is better situated to shape the character of the transition between Downtown and Wilburton.



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Aerial View 4 - Looking Northeast



Street View 3 - Looking East from NE 4th



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Streetscape and Ground Level Vision

Design Goals

1. **Ground Level Engagement**
Design using ground level engagement between exterior and interior spaces.
 - Plaza spaces along 116th Avenue NE.
 - Transparent and active facades along internal sidewalks, private roads, alleys and driveways.
 - Walk up entries along streets where feasible.
2. **Variety of Spaces**
Incorporate a variety of spaces, both active and passive.
3. **Integrated Perimeter Site Design**
Merge service access, green buffers, and building access into a sustainable and secure site perimeter.



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Development Opportunities

Bridges vision has many opportunities helping support Bellevue's current and future development goals. Inherent within flexible, multi-use, urban-in-fill developments are economies of scale, synergistic neighborhood support, and reduced resource needs.

Opportunities:

1. **Uniqueness**
The site is one of the remaining underutilized sites near Downtown that can accommodate large-scale development.
2. **Grand Connection & Transit Proximity**
The site is well-connected by the street and transportation network, with proximity to the Grand Connection and Light Rail.
3. **Dwelling Unit Demand**
Potential delivery of more than 1,200 housing units to help meet the City's demand for housing and growth targets. In order to achieve this, Urbanism zoning will need to be flexible rather than prescriptive in development standards and uses.
4. **Sustainability**
Environmental sustainability through high density residential development new jobs reduces impacts on public infrastructure and spread. Higher density development lowers consumption of undeveloped land and reduced carbon emissions and fossil fuel consumption by residents. New buildings provide opportunities for sustainable construction and technology. In addition, ground level landscaping furthers the City's ethos to be a "City in a Park."
5. **Multi-Building Connections**
Provide multi-level connections between project towers; ground level, podium level, and sky level.



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Development Challenges - Flexibility...Flexibility...Flexibility

Zoned OLB (Office and Limited Business), the 411 site does not currently support Bridges vision for a Multi-Use development. To support a Live, Work, and Play environment, the current Urbanism neighborhood zoning will need to be reviewed with emphasis given to higher density, program flexible development approaches.

Challenges and Requests:

1. **Zoning Standards** - FAR, height limits, and development standards must be calibrated to achieve appropriate density.
 - **Density** - Bridges Group requests City to consider the following density limits:
 - Residential Developments: at least 8 FAR and up to unskirted FAR, 13,500 S.F. max. floor plate size, 45' height limit
 - Commercial Developments: at least 5 FAR, 24,000 S.F. max. floor plate size.
 - **Buffers from off-site** - Surrounding context should not constrain adjacent allowed density. Sites with critical areas should be given additional flexibility in building design/development standards to achieve density.
 - **Incentive Amenity System** should allow development to achieve maximum density and heights above a base with flexible amenity options like affordable housing, flexible open space, and sustainability measures. The incentive system should allow best-in-class in addition to on-site and off-site performance options for all amenities.
2. **Flexible Development Envelope** - Multiple tower projects share a connected podiums to support a variety of uses.
 - **Large Podiums** - Allow podiums to be large as long as they are well-articulated and modularized.
 - **Tower Spacing** - Determine reasonable tower separation standards. Tower spacing should be variable on multiple tower sites. Also, consider towers to be connected at upper levels so as to share usable spaces. (not just corridors)
 - **Upper-level Setbacks** - Do not implement arbitrary upper level podium setbacks that require a "wedding cake" design.
 - **Multiple Towers** - Provide additional design flexibility for multiple tower projects with a variety of proposed heights.
3. **Flexible vs. Prescriptive Uses** - Be flexible rather than prescriptive in allowed use designations.
4. **Market Parking** - Avoid parking requirements and allow on the market to supply adequate parking.
5. **Hybrid Service/Access Road** - Allow service uses like loading, trash collection, and others to be consolidated in a service road with a minimum 10' driveway width.
6. **Reasonable Noise Reduction Standards** - Set reasonable noise reduction level standards as part of development guidelines for residential developments.
8. **Reasonable Emissions Standards** - Rely on design standards as mitigating measures to prevent vehicle emissions from reducing air quality standards for public outdoor areas.

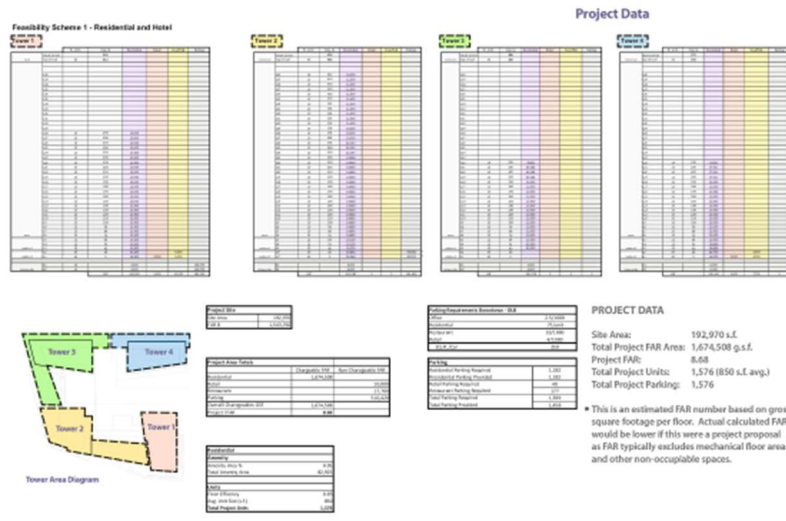


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Flexibility...Flexibility...Flexibility

Enbridge goal is to propose comparable zoning and development strategies from the region that are adjusted to suit Bellevue's unique conditions. For comparison, located in the Denny Triangle neighborhood of Seattle, One's mixed-use project 2301 7th Avenue is a high-density development with multiple residential towers along atop a podium of commercial office a red-ground-level retail.

2301 7th Avenue utilized Seattle's zoning code guidelines and residential incentives to maximize project development. With incentives, the maximum commercial FAR is 8 with unlimited residential FAR up to 440.

2301 7th Avenue Project Data

Commercial Area:	311,000 s.f.	FAR equivalent: 8
Residential Area:	712,000 s.f.	FAR equivalent: 18.3
Project Total Area:	1,023,000 s.f.	FAR equivalent: 26.3
Site Area:	38,000 s.f.	



Density Comparison



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RESPONSE

MOUNTVUE PLACE LLC
14510 NE 20TH STREET – SUITE 205
BELLEVUE, WA 98007

June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1150 124th Avenue NE in Bel-Red*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Mountvue Place LLC (“Mountvue”) as part of the public comment process for the City of Bellevue (“City”) 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (“DEIS”). Thank you for your work to date on the DEIS—we are impressed by the clear vision it sets out for bold growth in the City over the next two decades.

Mountvue owns the property located at 14506 NE 20th Street in Bel-Red (the “Site”). The Site is currently developed as a commercial office and retail center, but we believe it is a compelling location for residential development, and we offer the following DEIS comments with this future in mind:

1. Retain the BR-MU-M designation in the Preferred Alternative.

Alternative 3 identifies BR-MU-M for the Site. We support this designation as it would allow maximum flexibility for midrise residential development in wood frame construction, in addition to the retail and office uses that exist today. We request the BR-MU-M designation for the Site be incorporated into the Preferred Alternative. This designation will not only fit within the broader character of Bel-Red as it densifies, but it provides a transition to Redmond’s Overlake neighborhood, just one block east of the Site, which is being considered for significant additional density as well. The BR-CR designation in Alternatives 1 and 2 that reflects current zoning and would only allow development between 4 and 6 stories. Retaining current zoning would result in underdevelopment of the Site for a future housing project and this outcome should be avoided.

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O-63-1 Comment noted.

O-63-2 The Preferred Alternative studied in the FEIS includes a future land use designation of BR-MU-M on the site indicated, which is similar to Alternative 3. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

O-63-1

O-63-2

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MOUNTVUE PLACE LLC
 14510 NE 20TH STREET – SUITE 205
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O-63-3 See Common Response 19 Zoning Details.

O-63-4 See Common Response 19 Zoning Details.

O-63-5 See Common Response 19 Zoning Details.

O-63-6 See Common Response 4 Housing Alternatives.

2. Add FAR to make midrise multifamily development more feasible.

A significant issue with the Site's current BR-CR zoning is the low FAR limit of 2.0. This limit is too low to support true midrise residential density across the Site the under current zoning, and it should be adjusted with the addition of the BR-MU-M designation. The Preferred Alternatives should clearly identify and study additional FAR of at least 6.0 in the FEIS to support the nine story building typologies envisioned.

3. Allow connected floorplates up to height limit and adjust rear setbacks.

Connected floorplates result in more efficient midrise buildings that still retain features like massing shifts, modulation, materials variation, and other design tools that break down building scale and result in more appealing structures. The current connected floorplate departure in Bel-Red zoning is only available to connect three stories above 40 feet in height. LUC 20.25D.080.B.1. To maximize midrise residential density and building efficiency, connected floorplates should be allowed in buildings up to the height limit in the BR-MU-M designation.

Further, the DEIS does not disclose assumed setbacks for the BR-MU-M designation as it would result in new zoning, however, the document does note that standards could be similar to current zoning. Several Bel-Red zones include significant, required 25' building setbacks from side and rear property lines above 40 feet if building height exceeds 80 feet. See LUC Chart 20.25D.080.A note 15. As with connected floorplates, this standard should be adjusted to apply to buildings that exceed 90 feet so that the midrise residential building envelope is more efficient and results in the creation of more housing units.

Adjustment of both of these standards should be clearly identified and studied in the Preferred Alternative in order to result in the most efficient building forms for housing.

4. Retain Bel-Red's incentive zoning structure, but recalibrate incentives.

As residential development has begun in Bel-Red in the last few years, the incentive zoning structure has resulted in affordable units and funds for affordable housing, especially when paired with the City's updated MFTI Program. We believe the incentive program coupled with MFTI can be powerful tools for housing creation. The Preferred Alternative should retain the current incentive structure for Bel-Red, and if the City's priorities for incentives have shifted, then it could study modifying the incentive tiers to reflect those shifted priorities. For instance, the Tier 1 affordable housing component for residential projects could be expanded to be a greater increment of the overall incentive, compared to the other components. We support recalibration and retaining the incentive structure compared to affordable housing mandates that have a high likelihood of halting redevelopment efforts as market conditions evolve. The FEIS Preferred Alternative should not include affordable housing mandates, and all assumptions of any mandatory program identified in the FEIS for other alternatives should be fully disclosed.

14510 NE 20TH STREET – SUITE 205 BELLEVUE, WA 98007
 PHONE: 425-746-1500

O-63

COMMENT

RESPONSE

O-63-7 See Common Response 16 Critical Areas.

MOUNTVUE PLACE LLC
14510 NE 20TH STREET - SUITE 205
BELLEVUE, WA 98007

5. Study exempting man-made slopes from critical area regulation.

There are several historic rockeries on our Site and immediately adjacent that were created as a result of prior, permitted development. Because the City's current Critical Areas regulations treat rockeries as steep slopes if they exceed 10 feet of height, this condition impacts development capacity and allowed location of development on the Site even though these "slopes" do not provide any environmental or geologic function. The Preferred Alternative should identify excluding man-made slopes from Critical Area regulation and should study the impacts of doing so. The FEIS should also identify the potential housing versus ecological benefit of continuing to regulate man-made slopes. Thank you for this opportunity to comment. We look forward to working with you over the next year plus as the Comprehensive Plan and future Bel-Red zoning changes are implemented. Please do not hesitate to contact me if you have any questions.

Sincerely,



Neal Mulnick for Mountvue Place LLC

cc: Emil King, Planning Director
Janet Shull, Strategic Planning Manager
Justin Panganiban, Senior Urban Designer/Planner
Abigail P. DeWeese, HCMP

14510 NE 20TH STREET - SUITE 205 BELLEVUE, WA 98007
PHONE: 425-746-1500

O-64

COMMENT

RESPONSE



O-64-1 Comment noted.

O-64-2 Comment noted.

June 12, 2023

VIA ELECTRONIC SUBMITTAL

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

Re: Bellevue 2044 Comprehensive Plan DEIS
 Wilburton Property Owners Group comment

Dear Reilly:

The Wilburton Property Owners Group (“WPOG”) is the coalition of property owners representing the Wilburton Neighborhood. Together, the WPOG represents many of the property interests in the Wilburton subarea; WPOG was formed to ensure that the property owners’ voices are clearly represented in the Wilburton planning and implementation stages. WPOG believes it is important to plan Wilburton with development flexibility in mind, given that the upcoming plan change represents a 20-year planning horizon during which much will change in Bellevue. WPOG has been an active partner with City staff since the original Citizens Advisory Committee was formed in 2017. WPOG is incredibly excited about the arrival of Eastlink, EastTrail, and the Grand Connection. It cannot be understated how transformative these infrastructure projects can be when combined with the right zoning. The Wilburton neighborhood can be a world class example of transit-oriented and trail-oriented development.

WPOG appreciates all of the City’s work to date, the City’s commitment to its published timeline, and the City’s attention to the Wilburton subarea in the Draft Environmental Impact Statement (“DEIS”). We look forward to working with the City on the Wilburton amendments and LUCA in the near term. The following are WPOG’s comments to the DEIS:

- **WPOG supports Alternative 3 to be adopted as the Preferred Alternative in the FEIS.**
 Alternative 3 achieves the most amount of growth in an area well-served by transit and other means of transportation. It also provides the most flexibility in future uses in the Wilburton subarea.
- **Allow additional flexibility in future uses.** The City should take an additional step in allowing flexibility in future uses in Wilburton. Figure 3-26 of the DEIS shows “proposed land uses in the Wilburton Study area.” Many of the areas are called “Mixed Use,” however, some areas are labeled as “Residential/Commercial Midrise or Highrise.” One of the issues that has stifled growth in the City of Bellevue is an overregulation of use within Comprehensive Plan and Zoning designations—many areas can only build office, or residential, but not both or either. Some areas also have unworkable, prescribed ratios of office and residential uses. The City should move away from

O-64-1

O-64-2

WPOG DEIS Comments
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O-64-3 See Common Response 19 Zoning Details.

O-64-4 See Common Response 18 Future Land Use Categories.

O-64-5 See Common Response 10 Wilburton Street Grid.

O-64-2

attempting to prescribe uses on a granular level. Instead, it should allow a broad array of uses across Wilburton with building forms that can support them.

O-64-3

- **Consider all areas of Wilburton as “Mixed Use” (in the purple shades) to allow the market to decide uses.** We cannot predict what uses will come to Bellevue in the next 20 years—indeed, we could not have predicted 20 years ago the growth that Bellevue is currently experiencing. Allowing wide flexibility in zoning helps the best businesses land in Bellevue; this approach is consistent with the City Council’s Economic Development Vision.
 - Mitigation Measure 2, Land Use Plans and Policies calls for development standards to be “informed by development standards established by other subareas.” While we think the Bellevue Land Use Code should remain internally consistent, we believe the City has an opportunity in Wilburton to more broadly allow for uses and development compared to other subareas such as East Main and Bel-Red. We encourage the City to be bold and flexible in its drafting of the Wilburton land use codes, and consider in the Preferred Alternative an analysis of this sort of flexibility in use.

O-64-4

- **Consider creating a “Wilburton” Comprehensive Plan designation in which all of the mixed use zoning may implement the Comp Plan designation—this allows for flexibility in zoning in the future and reduces private and City administrative burden when the market calls for a change of zoning.** This would allow for more efficient rezones of property and would reduce both private and public burden to make flexible land use changes in the 20-year horizon.

O-64-5

- **Learn from past mistakes and avoid implementing unworkable, expensive, and unnecessary road grids.** Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a potentially proposed road grid. **WPOG does not agree that a road grid for automobiles is necessary. WPOG has significant concerns about a proposed road grid that appears to have no regard for property boundaries, existing topography or the City’s ability to effectively deliver the road grid in an efficient manner.** By all accounts the City’s requirement for a local street grid in Bel-Red has hindered development and added to housing costs for the properties that have developed. The City should learn from this record. Instead, in the Preferred Alternative, the City should study whether a built out road grid would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is truly necessary. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.
 - It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. WPOG supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
 - We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
 - **WPOG also applauds the City’s inclusion in its TFP for funding for East Trail and encourages a Comprehensive Plan policy and inclusion in the TFP for flexible funding for the Grand Connection.** It cannot be overstated how important these multimodal connections are to the future of the City of Bellevue and to the development of the Wilburton neighborhood. Completing the first phase of the Grand Connection as fast as possible with a reasonable improvement that delivers baseline connectivity to the neighborhood should be a top City priority.

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COMMENT

RESPONSE

O-64-6	<ul style="list-style-type: none"> • WPOG applauds the City's proposed transportation mitigation measures stated in M-TR-1 through M-TR-4. The City rightfully cites the land use/transportation connection as the best way to mitigate transportation impacts. Specifically, the City states that Alternative 3 has "inherent transportation benefits compared to the No Action Alternative." WPOG agrees; in a dense urban environment, focusing on TDM strategies, encouraging transit use, and building out pedestrian and bicycle networks are the best way to move more people more efficiently. Creating a more walkable and bikeable area (not driveable area) also adds vibrancy to a neighborhood and supports ground level uses and neighborhood businesses. 	O-64-6 See FEIS Chapter 11, <i>Transportation</i> , for additional information on potential impacts and mitigation measures.
O-64-7	<ul style="list-style-type: none"> • WPOG has concerns regarding the GHG significance finding and "air quality buffers" along pollution-generating arterials. Most of Wilburton could qualify for being located in a high air pollution area given its location proximate to I-405 and other major arterials. Yet, the DEIS admits that there is no applicable level of significance for air quality, and it also admits that the air quality analysis does not consider the impact of the TDM mitigation measures identified in the transportation chapter. Together, we are concerned these shortcomings overstate the GHG impact. The FEIS should study the mitigating impact of transportation mitigation measures on air quality as the first line of mitigation measures. Only then should the City's suggestion for air handlers for residential projects near freeways be considered. Ultimately this should be left to the market to design solutions. Building designers can creatively deploy HVAC design to intake air away from major arterials and use other technology to ensure safe indoor air quality. The City should rely on the market to deliver solutions rather than requiring specific systems that would significantly increase the cost of housing in Bellevue. If the City does desire to proceed with air handler requirements, then it should carefully study what would happen to its density projections if such a mitigation measure is adopted. Again, reducing the source of pollution as much as possible should be the first mitigation rather than enacting stringent mitigation measure that would disallow much development in Wilburton. 	O-64-7 See Common Response 8 Air Quality/GHG. O-64-8 See Common Response 19 Zoning Details. O-64-9 See Common Response 16 Critical Areas.
O-64-8	<ul style="list-style-type: none"> • WPOG is concerned about mitigation related to "Aesthetic Impacts" that will further reduce the efficient creation of density. The DEIS states that additional transition measures or other measures to reduce Aesthetic Impacts could be considered as mitigation. Such mitigation measures should be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85' should be allowed larger floor plates, and residential towers above 85' should be sized such that efficient residential units can be delivered (upper level setbacks add cost to structures). Further, like Downtown, small sites less than 40,000 square feet should be given off-ramps from prescriptive standards to ensure efficient use of land. In addition, shadow impacts should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density and cost to deliver projects (including increased appeal risk) related to such a regulation. Impacts on public views should also similarly not be regulated. The City already considered this and decided it was not the correct answer during the Downtown upzone with respect to views of Mt. Rainier from City Hall. This issue has been put to bed and should not be relitigated. 	
O-64-9	<ul style="list-style-type: none"> • The City must study the Plan's impacts to Critical Areas, or risk an inadequate EIS. The DEIS does not include adequate analysis of the Plan's potential impacts to critical areas, including streams and steep slopes. The lack of analysis renders the EIS potentially inadequate. As part of this analysis, the City should analyze the impacts of the Critical Areas Ordinance on the deliverance of density such that decisionmakers can understand the impacts the steep slope regulations and stream buffers may have on density. Developable area portrayed by the DEIS as being feasible is oftentimes rendered infeasible due to the application of steep slope buffers, wetland buffers (like around Lake 	

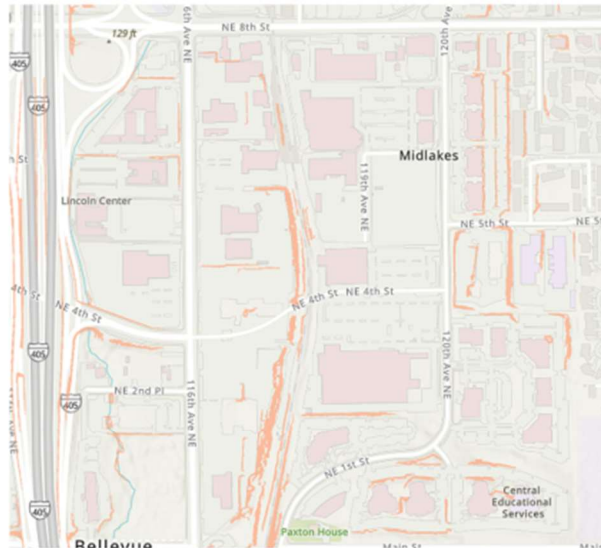
O-64

COMMENT

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O-64-9

Bellevue), and stream buffers; this misleads decisionmakers into thinking building may occur in certain areas when it will not. Sturtevant Creek runs through the heart of Wilburton and many steep slopes (manmade and otherwise) exist within the Wilburton subarea. A strip of the City-mapped steep slopes (in orange) in a portion of Wilburton is included to show how impacted this area is by Critical Areas and buffers. The City should analyze impacts of changing the critical areas ordinance to allow man-made steep slopes to be redeveloped and not require buffers. The City should also analyze the impacts of the Critical Areas Ordinance "density penalty" on development in Wilburton and determine how the penalty would impact the ability of the Wilburton vision to be achieved. The critical area penalty should not be applied in Wilburton, similar to how it does not apply in Downtown. Please incorporate such analysis into the Preferred Alternative.



O-64-10 The EIS is a disclosure document, disclosing potential environmental impacts associated with the range of growth alternatives studied in the EIS. It also includes measures that can be taken to mitigate those impacts. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. In addition to the 'right to return' policies, tenant relocation assistance, and community benefits agreements, additional mitigation measures include the following: incentives that encourage affordable commercial space for small businesses, especially in areas at high risk of displacement. These could include reducing parking standards and setting average or maximum sizes for new ground floor spaces that result in space sizes that are more affordable for small businesses (see Draft IES page 3-88); and, creating a program to ensure that affordable office and retail sales are available. The programs could consider financial incentives such as tax abatements, technical assistance and outreach, or integration of office/retail affordability with livability initiatives (see DEIS page 5-27).

O-64-10

- WPOG has concerns with additional potential mitigation measures:
 - Requiring displaced businesses be given a "right to return" or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize space for small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated

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RESPONSE

O-64-10

business, streamlined tenant improvement and sign permits for small businesses, traffic impact fee waivers, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City's idea of an "MFTE" program for small business location is a creative idea that could actually result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS.

O-64-11

- o Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in Wilburton or increase the cost of housing. The impact of such mitigation measures should be studied in disclosed in the EIS.

O-64-12

- **The Preferred Alternative should include affordable housing incentives, not mandates.**
 - o We recognize and agree that creating abundant housing affordable to all income levels is one of the biggest challenges facing our City and the region as a whole. We believe private development has two roles to play in addressing this issue: first, private development of new housing increases the supply of housing overall, easing market pressures on rent and price; second, private development can be successfully incentivized to incorporate or pay an in-lieu fee for affordable housing through thoughtfully calibrated height and density bonuses and tax programs like MFTE. Beyond these roles, there are limits to what private development can deliver, and we strongly believe exacting affordable housing mandates that increase the cost of housing overall and carry a high risk of freezing the development pipeline are not the right answer for Bellevue. The City identified components of a mandatory inclusionary affordable housing program in Alternative 3, and it should not move forward with this concept in the FEIS Preferred Alternative.
 - o Instead, in the Preferred Alternative, the City should study expansion of a thoughtfully calibrated height or density-based affordable housing incentive program in Wilburton, and it should identify other tools and funding sources that do not rely on private development to create affordable housing. Further, such an incentive-based program should consider the total cost of development in its calibrations, including the cost of infrastructure, updated building codes, development standards, and current market conditions, when determining the value that is available for such a program. Last, the City should provide an in-lieu-fee alternative in the incentive program, which can be a valuable funding tool for the City to deploy to directly fund housing subsidies or new affordable units. Such an in-lieu fee should be priced based on the value of the incentivized square footage to the development.

O-64-13

O-64-14

WPOG believes that the confluence of light rail, regional trails, easy access to freeways and arterials, make the Wilburton neighborhood unique in the region and a great opportunity for the City of Bellevue. We look forward to working with the city to create a regulatory environment that leads to future development that brings real benefits to everyone in the larger community and helps address some of our region's most pressing challenges. We appreciate the City's undertaking of Bellevue 2044 and appreciate the City's bold

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O-64-11 The comment expresses concern that requiring an interior noise level of 45 dBA for residential development would place an unfair cost burden on some areas within Bellevue and that the interior noise requirements should be uniform throughout the City.

Bellevue Municipal Code Section 9.18.045B Development Restrictions establishes an interior noise standard applicable to all development within the City. Specifically, new residential structures shall not be approved for construction if the exterior Ldn anywhere along the proposed building lines of the structure exceeds 65 dBA unless sound attenuation measures are incorporated into the site design and/or the design and construction plans of the structure which are intended to reduce the maximum interior Ldn to Forty dBA or lower for sleeping areas and forty-five dBA or lower for nonsleeping areas. Consequently, the interior noise requirements within the City of Bellevue are applicable to all areas within the City where exterior noise exceeds 65 dBA, Ldn. Additionally, the costs associated with meeting the interior standard have been a requirement since the ordinance was adopted into the City Code in 2007.

O-64-12 See Common Response 4 Housing Alternatives.

O-64-13 See Response to O-64-12.

O-64-14 Comment noted.

O-64

COMMENT

RESPONSE

vision in planning for growth in the next 20 years. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

WPOG

Gardner Morelli, Eastridge Partners LLC

Panfilo Morelli, Eastridge Partners LLC

Bill Finkbeiner, Finkbeiner Building LLC | Bellevue Vista Properties LLC

Jon Roskill, Bellevue Vista Properties LLC.

Sydney Ostrem, RCJ Properties

Jenifer Thornton, RCJ Properties

Lew Brunhaver, Beta-Bellevue Auto Center LLC

Steve Kramer, Bellevue Development LLC | Bellevue Development Westridge LLC | 8th Street BK LLC

Andrew Coates, KG Investment Properties LLC | Bellevue 116th Avenue LLC | Bellevue 116th Avenue South LLC | 457-120th Avenue NE LLC

Roger Kuula, American Capital Group

BJ Kuula, American Capital Group

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David Sinnett, American Capital Group

Levi Singleton, American Home Builders

Sean Thorson: ACG Development

Kenny Dudunakis, Berkadia

Kirk Mathewson, Midlakes, LLC | Ditty Properties

Campbell Mathewson, Midlakes, LLC | Ditty Properties

T.J. Woosley, Hal Woosley Properties, Inc. | Brierwood Center LLC

Todd Woosley, Brierwood Center LLC.

David Woosley, Brierwood Center LLC

Doug Exworthy, TRF Capital LLC

Jane Blair, Lindsey Properties

Kendall Anderegg, President and CEO Mutual Materials

Bob Griffith, The Pumphouse Bar & Grill

Paul Etsekson, Max Capital LLC

Michele Mulnick, Max Capital LLC

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COMMENT

RESPONSE

Neal Mulnick, Max Capital LLC

Doug Rosen, Alco Investment Company

Adam Rosen, Alco Investment Company

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COMMENT

RESPONSE

O-65-1 The Preferred Alternative studied in the FEIS includes future land use around Lake Bellevue with a RC-M character. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.



June 12, 2023

VIA ONLINE PORTAL, EMAIL, AND U.S. MAIL

Elizabeth Stead
 Bellevue Development Services
 City of Bellevue
 450 110th Ave. NE
 Bellevue, WA 98004
 Email: CompPlan2044EIS@bellevuewa.gov

Re: Wilburton Vision DEIS Comment

Dear Ms. Stead:

This Firm represents the Nine Lake Bellevue Owner's Association, which consists of members of the Nine Lake Bellevue Condominium (sometimes referred to as Nine Lake). On behalf of the Association, we submit this comment letter in response to the DEIS for the Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The Nine Lake Bellevue Condominium contains a 25-unit office building on the west side of Lake Bellevue in the Wilburton study area. The Condominium also owns a surface-level parking lot south of the office building and southwest of the Lake. The Nine Lake parking lot is adjacent to the Link light rail Wilburton Station, which is anticipated to open in 2024 or 2025. Right next to the Station, the parking lot is a prime location for sustainable, transit-oriented development (TOD).

Per the [City website](#), the primary goals of the Wilburton Vision Implementation are to "facilitate redevelopment in the Wilburton study area, improve amenities, incentivize transit- and trail-oriented uses and establish a unique identity for the area." Similarly, the Scope of Work Summary for Wilburton Vision states that the City hopes to "realize the vision of a vibrant, inclusive and sustainable future for Wilburton." The broader DEIS touches on similar themes of sustainability, TOD, and increased housing capacity.

The Nine Lake Bellevue Condominium owners share the City's goal of building a sustainable future with vibrant neighborhoods, greater housing choices, and TOD. Thus, the owners were disappointed to learn that only Alternative 3 of the DEIS proposes upzoning on the Lake Bellevue properties, including the Nine Lake property (parcel no. 609350000). Alternatives 1 and 2 show no upzoning to the Lake Bellevue properties. The DEIS does not explain why Alternatives 1 and 2 propose no upzoning around

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O-65-1

O-65

COMMENT

RESPONSE

Elizabeth Stead
June 12, 2023
Page 2

Lake Bellevue while Alternative 3 does propose upzoning. Given the many opportunities at Lake Bellevue for TOD adjacent to the new Wilburton Station, omitting TOD options in Alternative 1 and 2 makes no sense.

Almost all of the dry land on the Lake Bellevue properties consists of parking lots:



Failing to upzone the Lake Bellevue properties would most likely cause those parking lots to remain as such—parking lots—even though the Wilburton Station will be within a few minutes of level walking distance of those lots. That would be totally incongruent with the City's stated goals of adding capacity for sustainable development, TOD, and housing.

Therefore, we respectfully request that **all** of the FEIS alternatives propose upzoning on the Lake Bellevue properties, including Nine Lake Bellevue.

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O-65

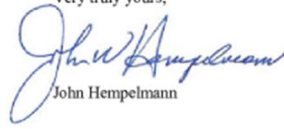
COMMENT

RESPONSE

Elizabeth Stead
June 12, 2023
Page 3

Thank you, and we look forward to working with you in building a vibrant and sustainable future.

Very truly yours,



John Hempelmann



Maxwell Burke

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O-66

COMMENT

RESPONSE

O-66-1 The Preferred Alternative studied in the FEIS included a future land use designation of MU-H-2 on the site indicated, which is similar to Alternative 3. See Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

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June 12, 2023

VIA EMAIL AND US MAIL

City of Bellevue Development Services
Attn: Elizabeth Stead
450 110th Ave NE
Bellevue, WA 98004
CompPlan2044EIS@bellevuewa.gov

Re: Wilburton Vision Implementation DEIS
RCJ Properties, LLC Comment

Ladies and Gentlemen:

Thank you for the City's careful thinking and process about the future of the Wilburton neighborhood. Thank you also for the opportunity to comment on the proposed Wilburton Vision. We represent RCJ Properties, LLC, the owner of the land where the Whole Foods Market is located northeast of the intersection of NE 8th and 116th NE. The family that owns RCJ has owned this Property for approximately 50 years, and has a deep commitment to the City. The Property is adjacent to, and subject to easements benefiting the new Wilburton Light Rail Station and the Eastrail Multi-use Corridor. RCJ is proud to have played a direct role in completing the multi-modal connections that are transforming the Wilburton neighborhood into one of the best-connected neighborhoods in the region. While the Property is now developed, RCJ, like the City, is very interested in looking out and planning decades in the future to ensure the Wilburton neighborhood continues to be an important contributor to transit and trail oriented development and the City's future growth.

RCJ strongly supports the City's adoption of Alternative 3 detailed in the Wilburton Vision Implementation DEIS. We have seen our City grow for many decades and we know that it will continue to grow much more in the future. Thus, providing for the broadest options for new development in the Wilburton neighborhood makes the most sense. This is particularly true because the region is spending tens of billions of dollars in Wilburton on high-capacity transit infrastructure including, most prominently, the Sound Transit East Link Light Rail and the I-405 Bus Rapid Transit project. Bellevue must take advantage of these huge investments in our City. All the properties within the 1/4-1/2 mile walking distance of the Wilburton Light Rail Station should be planned for intense development that can rely upon and benefit from the Light Rail and reduce dependence upon automobiles. As you are aware,

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O-66-1

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City of Bellevue Development Services
June 12, 2023
Page 2

studies show that people who have access to high-capacity transit stations can reduce reliance on automobiles and have more dollars available for housing, education, recreation, and other priorities that positively grow communities.

Alternative 3 provides for maximum development flexibility, allowing the market to determine the right mix of office, retail, and residential uses. Alternative 3 allows for the most effective development of offices closer to new homes and retail amenities to support both office and residential uses. We know our region is facing a housing crisis. We need more housing of every type, closer to transit, office uses, and retail. The Wilburton area has many acres of underdeveloped property that can be developed for more housing and mixed uses. In addition to the ability to move via mass transit, the development of Eastrail will provide a wonderful amenity that not only attracts new residents and office users but facilitates movement without automobiles.

The Wilburton Light Rail station also will serve our hospitals and medical services sectors. This sector will continue to grow, and the Wilburton Vision should actively support this growth. Alternative 3 provides the best way to support health care-related business and housing opportunities to both grow quality jobs for medical centers and take advantage of easy access to those medical centers.

Alternative 3, with its focus on mixed use and density close to the City's existing arterials, new transit systems, and Eastrail, represents the best approach to smart, transit-oriented development over the next several decades. For these reasons, RCJ strongly supports Alternative 3 in the Wilburton Vision Implementation DEIS.

Very truly yours,



Stephen P. VanDerhoef

SPV:kmc

{04798000.DOCX;1 }

O-67

COMMENT

RESPONSE



City of Bellevue Development Services Department
Attn: Elizabeth Stead
450 110th Ave NE, Bellevue WA 98004

Subject: Eastside Affordable Housing Coalition Comment on Bellevue 2024-2044 Comprehensive Plan Update Draft Environmental Impact Statement

O-67-1 The Eastside Affordable Housing Coalition is committed to advancing housing affordability through Bellevue's Comprehensive Plan update. We thank you for the opportunity to comment on this once-in-a-decade major update and appreciate the work Bellevue has done to prepare the Draft Environmental Impact Statement (DEIS). **We are writing to express our strong support for allowing an abundance of homes to be built, alongside expanded funding and robust inclusionary zoning policies to create new homes affordable for low-income families.**

O-67-2 Bellevue faces a housing crisis. Home prices and rents in Bellevue have spiraled out of reach for so many people. This reflects Bellevue's desirability as a city and a basic job-to-housing imbalance that forces workers to commute long distances into Bellevue. To sustain itself, Bellevue must build homes affordable to its essential workers—the teachers, nurses, firefighters, and restaurant workers that make the city's economy and society function.

O-67-3 Bellevue has a window to make significant progress in advancing affordability and the opportunity to be a regional leader in addressing the housing crisis. This Comprehensive Plan Update is a major opportunity to create a more livable, equitable, and vibrant Bellevue.

O-67-3 **Alternative 3, by allowing the highest amount of housing capacity alongside implementation of mandatory inclusionary zoning, goes the furthest to realize a vision of abundant, affordable housing throughout Bellevue.** Allowing more housing to be built will help address Bellevue's housing shortage and job-to-housing imbalance. Mandatory inclusionary zoning allows the public to capture some of the added value from upzoning and ensure we are directly creating homes affordable to low-income people.

O-67-4 Alternative 3 will also help create a better city for Bellevue residents, by creating complete neighborhoods with a mix of housing options, jobs, services, and multimodal transportation. It will expand walkable access to small businesses and retail, giving more people the choice to meet their daily needs without a car. It will support investments in frequent and convenient transit and safe and connected walking and biking routes. And it will help more Bellevue residents of all income levels and life stages find a place to call home in a city they love.

O-67-1 Comment noted.
O-67-2 See Common Response 4 Housing Alternatives.
O-67-3 See Common Response 4 Housing Alternatives.
O-67-4 Comment noted.

Housing Development Consortium
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- O-67-5 See Common Response 19 Zoning Details.
- O-67-6 See Common Response 4 Housing Alternatives.
- O-67-7 See Common Response 19 Zoning Details.
- O-67-8 See Common Response 4 Housing Alternatives.

Beyond our general preference for Alternative 3, the Eastside Affordable Housing Coalition has a number of specific recommendations and comments on the DEIS. We hope you carefully consider our recommendations, as you judiciously work to shape a preferred alternative and the Final Environmental Impact Statement (FEIS).

Detailed Policy Comments & Recommendations

- O-67-5 **Mandatory Inclusionary Zoning** – In this Comprehensive Plan update, Bellevue has the opportunity to build many more homes, harness private development, and create broad-based and equitable growth. **It can only maximize this potential and meet Bellevue's substantial need for homes affordable to low-income people by pairing strong inclusionary zoning with ambitious housing growth.** Furthermore, the preferred alternative should incorporate a commercial fee-in-lieu, to ensure new commercial and office development also contributes to the development of affordable homes.
- O-67-6 **Affordable Housing Need** - Bellevue's housing need allocation demonstrates the need to build many homes affordable to low-income people over the course of this Comprehensive Plan Update—over 29,000 affordable at less than 80% of Area Median Income (AMI), including 18,000 affordable at less than 30% AMI¹. All of the alternatives should quantitatively analyze the impact of various growth strategies and housing production rates on the total homes affordable by area median income (AMI) band, with special attention paid to residents making less than 30% of AMI, 30-50% of AMI and 50-80% of AMI.
- O-67-7 Additionally, while inclusionary zoning is an important policy for scaling up the production of affordable housing in Bellevue, it will likely need to be complemented by other funding sources for affordable housing. **The FEIS should analyze the gap between current available funding for affordable housing and the resources it would take to meet the need for affordable housing.**
- O-67-8 **Midrise Housing** - While any new housing requires subsidies to be affordable to low-income people, lower cost typologies like midrise apartments will reduce the subsidy required, and should therefore be maximized in the preferred growth strategy. According to the Department of Commerce's draft guidance for jurisdictions to meet their allocated housing needs across the income spectrum, as is required under HB 1220, higher-cost cities can *only* demonstrate the ability to meet housing need allocations for low-income (0-80% AMI) housing with zoning that allows for midrise multifamily development.²

¹ King County Housing Needs Dashboard.
² Washington Department of Commerce, [Draft Guidance for Land Capacity Analysis](#), p. 14, Exhibit 9, December 2022.

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O-67-9 See Common Response 19 Zoning Details.

O-67-10 The transit proximate areas was not used to identify areas for changes to future land use in the Preferred Alternative.

O-67-11 See FEIS Chapter 11, *Transportation*. Most of the light rail stops are within Mixed Use Areas which are the centers of residential and commercial growth.

O-67-12 See Common Response 4 Housing Alternatives.

O-67-9

Alternative 3 goes the furthest to permit midrise, mixed-use apartments within walking distance of frequent transit service and neighborhood centers. We believe that the Future Land Use Map designations in areas currently zoned for multifamily and/or commercial use are broadly appropriate in Alternative 3, though we specifically recommend that the “R-High” land use designation be revised to incorporate midrises up to 8 stories, from the current 4-6 stories. This reflects the maximum height that can be feasibly developed using cost-effective wood-frame construction typologies. Revising the midrise height to 8 stories would better allow tree canopy to be preserved and enhanced, by reducing the footprint of new buildings.

O-67-10

However, comparing the Future Land Use Map of Alternative 3 to the Transit-Proximate Areas Map reveals that many transit-rich, high-opportunity locations currently zoned for single-family housing are not contemplated for land use changes to allow for midrise housing. **The Future Land Use Map of Alternative 3 should be revised to align with the high-level policy intent and description of this alternative, by allowing for midrise housing within the full ¼ mile walkshed of frequent bus transit in all residential zones.** Allowing midrise housing near transit in single-family zoned areas will advance environmental justice, as few, if any, of these areas are located within 500 feet of highways.

O-67-11

Light Rail & Transit-Proximate Areas – Light rail will transform transit mobility on the Eastside. A plan for the next 20 years of growth and development in Bellevue must holistically consider all of the light rail station areas. The Transit-Proximate Areas and commensurate housing density should expand as the transit service increases over time, and projections for future transit nodes should be incorporated into the FEIS alternative selected. **To this end, the FEIS should map the ½ mile walkshed around each of the light rail stations in Bellevue. This analysis of light rail access should then inform the development of preferred alternative, which should allow midrise housing or greater in the ½ mile walkshed around each of the light rail stations.**

O-67-12

Middle Housing – Alternative 3 would legalize a range of middle housing options, including duplexes, triplexes, and cottage housing, throughout the entirety of Bellevue. Allowing middle housing across the city is key to equitably distributing growth and creating more options for people. These options can create new affordable rental and homeownership options while still reflecting a residential character and allowing space for trees. **To comply with HB 1110, the middle housing bill, the preferred alternative must go further than Alternative 3, to increase the range of middle housing options allowed throughout Bellevue to accommodate fourplexes citywide, and sixplexes when two of the homes are affordable or near transit.**

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O-67-13 DEIS Chapter 7, *Housing*, includes a discussion of displacement risk (beginning page 7-21). Economic and physical displacement are not called out separately. Because this is a non-project EIS, environmental impacts are broadly identified.

O-67-14 Cataloging surplus land is outside of the scope of this EIS. Bellevue’s adopted Affordable Housing Strategy includes five strategies and 21 actions to increase the availability and access to affordable housing. Action C-2 focuses on opportunities to work in partnership with various agencies to develop affordable housing on suitable surplus public lands near transit hubs. Implementation of this action is ongoing.

O-67-15 See Common Response 19 Zoning Details.

O-67-13 **Distinguishing Economic & Physical Displacement** – It is important to clearly distinguish physical and economic displacement. Physical displacement is the result of direct demolition, while economic displacement occurs when residents and businesses cannot afford escalating rents or property taxes. The DEIS notes the likely directional effect of the alternatives on physical and economic displacement (“*physical displacement may be lower in the No Action Alternative because of its lower overall capacity for housing growth. Economic displacement will be higher in the No Action Alternative given that it does not include additional strategies to increase affordability*”). **The FEIS should go beyond this qualitative directional assessment, to quantify the expected impacts of each of the alternatives on economic and physical displacement.**

Economic displacement can far outpace physical displacement, as the price of existing housing is bid up in the context of a housing shortage. The City of Seattle analyzed rates of economic and physical displacement between 2010 and 2018, finding a net loss of over 24,000 rental homes affordable at less than 50% AMI—even after accounting for new affordable housing development—while physical displacement of low-income tenants due to demolition was measured at 5,264.³

As the DEIS notes, Alternative 3 has the greatest potential to reduce economic displacement relative to the other alternatives, by creating more housing overall and more affordable housing. This effect should be quantitatively estimated, to accurately compare overall residential displacement risks between the alternatives and develop appropriate anti-displacement strategies.

O-67-14 **Surplus Land and Land Acquisition Strategies** – Land costs are a major driver of the increasing cost of building affordable housing. Bellevue has made strides in recognizing the importance of leveraging underutilized land owned by public, religious, and non-profit entities through the C-1 Affordable Housing Density Bonus. **As part of the FEIS, Bellevue should catalog the locations of such surplus or underutilized land across and designate these sites for midrise housing, especially in locations served by frequent transit or within walking distance of neighborhood centers.**

O-67-15 **Development Standards** – Requirements for setbacks, upper level setbacks, modulation, and articulation increase development costs, reducing feasibility and the value that can be captured for affordable housing, in exchange for limited or subjective aesthetic benefits. Such development standards require more complex building envelopes, directly reducing energy efficiency and making innovative construction methods like cross-laminated timber or modular construction more difficult. **Therefore, we recommend against advancing development standards such as setback, stepback, or building form requirements as mitigation measures for aesthetic impacts in the FEIS.**

³ City of Seattle, [Displacement Risk Indicators](#).

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RESPONSE

The Eastside Affordable Coalition looks forward to working with the City of Bellevue throughout the Comprehensive Plan Update process. We are committed to shaping Bellevue's land use to allow more affordable homes to be built, and to creating a more equitable, affordable, and green city.

Thank you,

Chad Vacuín
Advocacy and Mobilization Manager
Housing Development Consortium

Jesse Simpson
Government Relations and Policy Manager
Housing Development Consortium

Cliff Cawthon
Co-Chair
Eastside Affordable Housing Coalition

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COMMENT

RESPONSE

O-68-1 Comment noted.

O-68-2 Comment noted.

McCULLOUGH HILL PLLC

June 12, 2023

VIA ELECTRONIC SUBMITTAL
CompPlan2044EIS@bellevuewa.gov

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

Re: Bellevue 2044 DEIS Comments

Dear Mr. Pittman:

We are writing on behalf of KG Investment Properties and Rockwood Capital to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investments and Rockwood Capital own 7 acres on the east side of 116th Avenue NE, between NE 4th Street and NE 6th Street (the "Property") – the heart of the Wilburton subarea and the point at which the Grand Connection and Eastrail will one day intersect. A map of the Property is attached for your reference. The Comprehensive Plan update will be important to the future use and development of our property and the role it will play in Bellevue's growth as a regional center.

General

- We support Alternative 3 as the Preferred Alternative in the FEIS. Alternative 3 achieves the most amount of growth in an area well-served by transit and other strong local and regional means of transportation, including bicycle and pedestrian connections, as well as a host of community-serving uses, such as grocery stores, medical services, restaurants, department stores and entertainment. It also provides the most flexibility in future uses in the Wilburton subarea.

O-68-1

O-68-2

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Land Use

O-68-3	<ul style="list-style-type: none"> • Uses. Like Downtown, the range of permitted uses in Wilburton zones should be very broad, including all typical urban uses. The Plan should not attempt to micro-manage land uses within the Subarea, but it should instead allow flexibility for future development to follow market demand. 	O-68-3 See Common Response 19 Zoning Details.
O-68-4	<ul style="list-style-type: none"> • Urban Form. Bellevue has traditionally used setbacks, building setbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitive buildings as designers substitute these dimensional tables in place of creative and site-specific design solutions. These types of regulations increase the cost of construction, reduce building efficiencies and the financial viability of new development – new development which is critical to realizing the Plan vision. Since the DEIS is an evaluation and disclosure document, it should also explore other options to solve the issues of building massing, human scale proportionality, site permeability and design rather than limiting the analysis to prescriptive and strict dimensional requirements. Developers should be allowed flexibility in how they achieve these urban design goals in lieu of prescriptive numbers. 	O-68-4 See Common Response 19 Zoning Details.
O-68-5	<ul style="list-style-type: none"> • Build-out of the Grand Connection and Eastrail. The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. In Wilburton, Eastrail will extend the Grand Connection north and south throughout the region. The City created Code provisions decades ago to promote the dedication and development of the Pedestrian Corridor. These provisions have and continue to be successful in incentivizing the development of the Corridor, and these same approaches should be used for the extended areas of the Grand Connection and Eastrail. Specifically, we suggest that the Final EIS evaluate the use of the “superbonus” provided in the Downtown Code for the future dedication and development of the Grand Connection and Eastrail in Wilburton. As in Downtown, the dedication and development of the Grand Connection and Eastrail could create FAR amenity points at a 16:1 ratio and those bonuses could be used to develop floor area above the height and density limitations otherwise applicable in the Wilburton zone. This has been a successful approach to the build-out of the pedestrian corridor downtown, and its use in Wilburton would promote the implementation of the Grand Connection. [In addition, we note that the State Legislature adopted SB 5452 in this year’s session, allowing transportation impact fee revenue to be dedicated to the development of bicycle and pedestrian facilities. The Final EIS should discuss the importance of making this new tool available to support the future development of the Grand Connection and Eastrail. 	O-68-5 The analysis of specific zoning regulations is outside the scope of this EIS. See Common Response 19 Zoning Details.
O-68-6	<ul style="list-style-type: none"> • City Property. The City-owned property on the west side of 116th Avenue NE near NE 6th Street (as extended) is a key element in formulating future land use patterns in Wilburton. Its location at the eastern end of the future Grand Connection I-405 Non-Motorized Crossing makes it an ideal location for potential public open space and neighborhood facilities. We encourage the City to explore such options in the Final EIS. 	O-68-6 Planning for specific use of the city-owned property on the west side of 116th Avenue NE is outside the scope of analysis for this non-project EIS. See Common Response 1 Non-Project EIS vs. Project Level SEPA.

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O-68-7	<ul style="list-style-type: none"> • Unit Density. The maps outlining future housing density by alternative (see, for example, Figure 2-2) establish 141 units per acre as a maximum residential density. This figure is quite low for an urban center environment; one would expect actual average densities in core areas to be much higher. The Final EIS should discuss actual projected residential densities in these core areas and determine whether this adjustment requires a refinement to the analysis. 	O-68-7	The densities shown in DEIS Chapter 2, <i>Alternatives</i> , Figure 2-2, 2-4, 2-6, and 2-8 are across a broad area and not specific to any one site. The density on a particular site may be higher or lower than the average.
O-68-8	<ul style="list-style-type: none"> • Future Land Use Map. The DEIS depicts the City's Future Land Use Map (FLUM) in Figure 3-6. However, this depiction does not accurately reflect the City's FLUM. Figure 3-6 is instead a highly generalized version of the FLUM, aggregating dozens of different actual land use categories into more general buckets. This generalization may be helpful for the reader, but it tends to mask a significant shortcoming of the City's Comprehensive Plan which the Final EIS should discuss. Bellevue's Comprehensive Plan in many areas employs FLUM designations that effectively mirror the zoning, so that in many cases there can be only a single implementing zone for a FLUM designation. The result in these cases is to prevent a rezone from being approved with a corresponding and prior amendment to the FLUM. This substantially reduces the ability of the rezoning process to be used as a tool for land use evolution in the periods between major Comprehensive Plan updates. The Final EIS should discuss converting the FLUM to a more generalized map, such as shown in Figure 3-6, to allow greater flexibility in zoning decisions going forward. 	O-68-8	See DEIS Appendix B, <i>Land Use Patterns and Urban Form Appendix</i> , for more detailed future land use maps and information about future land use designations. See also, Common Response 18 Future Land Use Categories.
O-68-9	<ul style="list-style-type: none"> • Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton. 	O-68-9	The analysis of development agreements is outside of the scope of this EIS. See Common Response 19 Zoning Details.
O-68-10	<p>Transportation</p> <ul style="list-style-type: none"> • The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts. <p>For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years, with probably less than 50% of full build-out. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final</p>	O-68-10	The EIS is a disclosure document, disclosing potential environmental impacts of the range growth alternatives identified and analyzed in the EIS. All development will likely not occur during the planning period, and the EIS discloses that the environmental analysis utilizes a conservative approach with respect to build out and impact analysis.

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O-68-10

EIS should note that the likelihood of such 100% build-out occurring for any alternative within the life of the Plan is essentially zero. To ensure that the legislative policy discussion regarding the Plan is rooted in reality, the Final EIS should also provide comparative impact analysis for lesser build-out scenarios for each of the alternatives.

O-68-11 Comment noted.

O-68-12 See Common Response 10 Wilburton Street Grid.

O-68-11

- NE 6th should terminate at 116th Avenue NE. Alternative 3A proposes an extension of NE 6th Street to 120th Avenue NE and the DEIS properly notes the reasons to reject this concept. We suggest that Alternative 3A be eliminated from the Final EIS. The intersection of the Grand Connection with Eastrail is a special opportunity for trail-oriented development that could become the gateway to Bellevue from the regional trail system. The extension of NE 6th Street to 120th Avenue NE would not only destroy this potential, but it would also require an enormous investment of funding, resources and time. Introduction of yet another Eastrail crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets Eastrail and dramatically undermine the pedestrian development potential and experience between NE 4th and NE 8th. We believe extending NE 6th Street with a termination at 116th Avenue NE is the best option for Wilburton for all of the reasons cited in the DEIS. Introducing another auto crossing of Eastrail does not meet the neighborhood or City vision for Eastrail and introduces significant safety issues to Eastrail (DEIS, p. 11-110). In addition, extension of SE 6th to 120th achieves nothing material in terms of transportation or circulation benefits (DEIS, p. 11-111).

O-68-13 Comment noted.

O-68-14 See Common Response 19 Zoning Details.

O-68-12

- Street Grid. Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a proposed road grid. No requirement of a “street grid” should be imposed on Wilburton. Grid streets can work well, as in Bel-Red, when they can be developed on generally flat or gently sloping topography and when they truly provide connections through and across a larger neighborhood to various destinations. Neither is the case here. The significant grades across the Property impair the use and activation of any such grid streets and those streets would not connect to any larger network – they would only dead-end into Eastrail or a retaining structure that supports it. The development of the Property can and should accommodate east-west pedestrian connections between 116th Avenue NE and Eastrail, but the introduction of vehicular access through the Property would be a mistake.

O-68-13

- Access from 116th Avenue NE. The Plan proposes to redevelop 116th Avenue NE into a new boulevard street. We endorse this design concept for 116th Avenue NE, but it must also be recognized that 116th Avenue NE will provide the only vehicular access for the high-density urban development sites adjoining it. Therefore, 116th Avenue NE must be planned and designed to satisfy these fundamental access requirements.

O-68-14

- Parking requirements. Required parking ratios should be flexible, demand-based and consistent with market requirements across other urban centers in Bellevue. Parking ratios that are too high or too low will only impede new urban development in this area. Furthermore, new development in Wilburton may reflect greater parking requirements than

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O-68-14 | seen in Downtown and Bel-Red, based on potential technology tenants. The DEIS should address this reality.

O-68-15 | • Grand Connection I-405 Non-Motorized/Bike/Ped Crossing of I-405. In April 2023, the City initiated the process of preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing (the "Grand Connection Crossing"). As we know, the Wilburton Subarea Plan includes an evaluation of the Grand Connection in general, which includes the Grand Connection Crossing. The vitality and design of future land uses in Wilburton will be significantly improved by the completion of the Grand Connection Crossing. The Final EIS should include a more thorough evaluation of the Grand Connection Crossing within the future transportation network. The Grand Connection Crossing should be identified as a key mobility mitigation measure both for Wilburton and the City as a whole.

O-68-16 | • Transit Proximate Areas. The depiction of Transit Proximate Areas in the DEIS is based on current data as of 2023. This fails to account for the likely expansion of transit service throughout the City over the next 20 years. The Final EIS should evaluate the potential for such transit expansion and should recommend possible land use changes to accompany such expansions, if they occur.

O-68-17 | • Eastrail Design. The DEIS should address the land use/urban design impacts of a grade-separated Eastrail crossing of NE 4th Street. In particular, the Final EIS should evaluate the potential impacts of a grade-separated alternative, including:

- Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 4th Street will require approaches that stretch 500 feet north and south into key redevelopment areas under the Plan. Approximately 80% of the unique pedestrian experience along the Eastrail between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.
- Such ramp structures will create a wall down the center of the Plan area and will divorce much of the Eastrail from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the Eastrail).
- The substantial cost of a grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

O-68-18 | An at-grade crossing option for NE 4th Streets was supported by the Wilburton CAC and has no adverse transportation impacts. It also allows a much-improved relationship between the Eastrail and adjoining land uses and avoids the construction of a wall through the middle of the Plan area. The Final EIS must fully evaluate the at-grade option in all Plan alternatives and undertake a complete assessment of the impacts of the grade-separated alternative as well.

O-68-15 | Analysis of specific transportation projects is outside of the scope of the EIS. Bellevue is initiating preliminary design for a new bridge across I-405 to extend the Grand Connection to Eastrail for pedestrians and bicycle riders. The Grand Connection will function as part of internal circulation network in the Wilburton TOD area.

O-68-16 | Land Use changes due to transit proximity have been removed from the Preferred Alternative.

O-68-17 | The analysis of specific transportation projects is outside of the scope of this EIS.

O-68-18 | The FEIS includes additional qualitative analysis of internal access within the Wilburton study area, which includes a combination of local access and active transportation facilities. Additional refinements to internal access needs for the Wilburton study area will be done as part of future code and policy updates, and not as part of the FEIS.

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O-68-19 See Common Response 8 Air Quality/GHG.

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O-68-20 See Common Response 22 Mitigation Measure Requirements.

Other Issues

O-68-19

- **“Air quality buffers”.** The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The Final EIS should eliminate this recommendation.

O-68-21 See Common Response 16 Critical Areas.

O-68-22 See Common Response 19 Zoning Details.

O-68-20

- **Mitigation.** The DEIS includes potential mitigation measures for many elements of the environment. It should be noted in the Final EIS that adoption of new comprehensive plan policies and zoning will be a legislative decision of the Bellevue City Council, and that since an environmental impact statement is being prepared, no mitigation is required under SEPA to address any adverse environmental impacts. The listing of potential mitigation measures in the DEIS only provides the City Council with options in the decision-making process. Ultimately, whether to adopt any mitigation measure identified in the DEIS lies in the sole discretion of the City Council.

O-68-21

- **Critical Areas.** Although the DEIS addresses a full comprehensive Plan update, it fails to address the City’s critical areas regulations. This is a significant omission. Bellevue’s critical areas regulations are outdated and inconsistent with the nature of urban development contemplated by the DEIS. The Final EIS should fully address this issue and identify revisions to the City’s critical areas regulations to promote urban development. These revisions for Wilburton would include:
 - Eliminating the density penalty included in the critical areas ordinance.
 - Rationalizing the ability of urban developments to address steep slope conditions with engineered retaining structures as an exemption to critical area ordinance compliance. This will be particularly important to ensure that development can occur alongside Eastrail and that the Eastrail experience can provide urban activation.

O-68-22

- **Impervious Surfaces.** The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should

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update its regulations accordingly.

O-68-23

- Views. The DEIS should acknowledge that future development will impact views and solar access. The DEIS evaluates the impacts of future development in Wilburton on views from public places and on shadows on other public places, such as Eastrail. The Final EIS should acknowledge that Wilburton redevelopment will inevitably impact view and shadows in this way. Redevelopment of Wilburton is not possible without creating such impacts; but it is not likely that any of these impacts would be significant. The segment of Eastrail between NE 4th Street and NE 8th Street is a unique opportunity on the entire trail for activation and urban-scale trail-oriented development. While there will be outstanding opportunities for light and view along the full Eastrail system, this is the one location on the entire Eastrail where there is the opportunity for significant trail-oriented urban development. This opportunity should not be limited or lost in an effort to address views and shadows on this limited segment of Eastrail. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation. Private views should also similarly not be regulated, and impacts to density should be reviewed. If public views are regulated, the City should specifically define a public view (from what viewpoint, views of which features are protected), and the impacts to potential density and the tradeoffs of protecting views and shadows in this manner should be adequately studied.

O-68-24

The DEIS should also evaluate the ways in which Plan implementation will create new views and solar access. Implementation of the Plan will create enormous new areas of open space and pedestrian paths and connection, which in turn will offer new viewpoints and opportunities for solar access throughout the Plan area. The Grand Connection by itself will become perhaps the best and most unencumbered viewpoint in the City to take in views of Mt. Rainier, the cityscape and the Cascade Mountains. Further, the Plan will transform the Wilburton area from one that is currently hostile to pedestrians to an urban village with robust new pedestrian activity, meaning that thousands more will be able to enjoy the new views created by the Plan. These comparative impacts should be evaluated in the Final EIS.

O-68-25

- District Energy Solutions. The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the Final EIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure.

O-68-23 Analysis of the impact on views is based on public views, not private views. Specific analysis of project level impacts associated with potential mitigation measures identified in the EIS, like setbacks, is outside of the scope of this EIS. The city may incorporate some of the environmental analysis and mitigation for impacts identified in the EIS into its policies, codes, standards, or regulations. See Common Response 19 Zoning Details.

O-68-24 Comment noted.

O-68-25 See Common Response 8 Air Quality/GHG.

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COMMENT

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We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,



John C. McCullough

cc: Rockwood Capital
KG Investment Properties

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COMMENT

RESPONSE

O-69-1 See Common Response 4 Housing Alternatives.

City of Bellevue Development Services Department
 Attn: Elizabeth Stead
 450 110th Ave NE, Bellevue WA 98004

June 12, 2023

Subject: Eastside Housing Equity Coalition Comment on Bellevue 2024-2044 Comprehensive Plan Update Draft Environmental Impact Statement

The Eastside Housing Equity Coalition is a group of BIPOC-led organizations organizing our communities to advocate for more affordable housing in our neighborhoods. We know that people of color, immigrants, and low-income households are disproportionately impacted by our housing crisis. Our communities face higher barriers to access homes affordable to their incomes and have significantly higher rates of being housing cost burdened. We are dedicated to pursuing policies through a racial equity lens that will make more housing affordable in Bellevue. The Comprehensive Plan Update is a rare opportunity to lay the groundwork for an inclusive city that we all desire. We appreciate the opportunity to provide input on the Draft Environmental Impact Statement (DEIS) and look forward to working together to make Bellevue a healthy and affordable place for all.

Bellevue is currently facing a housing crisis, with home prices and rents skyrocketing beyond the reach of many people. The communities we speak to tell us repeatedly that it is getting harder and harder to find an affordable place for their family to live in Bellevue. Too many families have told us that while they want to live in Bellevue because that is where they work, go to worship, or where their kids go to school, they have been forced to move out of the city or move in with other families. For Bellevue to thrive, it must prioritize the construction of affordable homes for its essential workforce, including teachers, nurses, caregivers, and service workers, who all contribute to the city's thriving economy and vibrant culture.

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The Comprehensive Plan Update presents a unique opportunity for Bellevue to make significant progress in addressing the housing crisis and become a regional leader in promoting affordability. **By embracing Alternative 3, which allows for the highest amount of housing capacity and implements mandatory inclusionary zoning, Bellevue can work towards its vision of abundant and affordable housing throughout the city.** Allowing more homes to be built in more areas will help alleviate the housing shortage. Mandatory inclusionary zoning ensures that the public benefits from increased development capacity, that affordable homes are directly created for low-income individuals, and that mixed-income communities are created so that people from all incomes have access to high-opportunity areas.

Alternative 3 will also contribute to creating a better community for all Bellevue residents. It aims to develop complete neighborhoods with a mix of housing options, jobs, services, and accessible transportation. This will enhance walkability, promote local businesses, reduce dependence on cars for daily needs, improve public transit, and provide safe walking and biking routes. Ultimately, it will enable Bellevue residents from diverse ages and income levels to find affordable homes in the city.

In addition to supporting Alternative 3, the Eastside Housing Equity Coalition has specific recommendations and comments on the DEIS. As the preferred alternative and Final Environmental Impact Statement (FEIS) are developed, we hope that the following recommendations are considered to improve the ultimate outcomes for our communities.

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COMMENT

RESPONSE

Comments & Recommendations:

Affordable Housing Need

The allocation for affordable housing in Bellevue highlights the urgent need to build many homes affordable to low-income individuals during the Comprehensive Plan update. Each alternative in the FEIS should thoroughly analyze the effects of its growth strategy and housing production rates on the total number of homes affordable to various income levels. Because people of color and immigrants are disproportionately represented in the lower income levels, paying particular attention to those making less than 30% of the Area Median Income (AMI), 30-50% of AMI, and 50-80% of AMI is crucial.

It is also important to note that housing costs are forcing households to move out of Bellevue. This is most publicly visible with the shrinking of the Bellevue School District enrollment numbers. High housing costs and families moving to more affordable areas have been noted by the district as key factors in enrollment decline.

Additionally, while inclusionary zoning is crucial for increasing affordable housing production, it will likely require additional funding sources. The FEIS should analyze the funding gap between the currently available resources for affordable housing and the resources required to meet the demand.

Mandatory Inclusionary Zoning

Bellevue should seize the opportunity presented by the Comprehensive Plan update to maximize housing growth and achieve broad-based and equitable development. Strong inclusionary zoning policies must be paired with ambitious housing growth to meet the substantial need for affordable homes. Moreover, the preferred alternative should include a commercial fee-in-lieu provision to ensure that new commercial and office developments also contribute to affordable housing.

Environmental Justice

When considering places throughout the city for increased housing capacity, it is essential that the city incorporates the long-term health of the residents residing in those homes. Housing that is affordable and healthy communities are not tradeoffs of one another, but rather two ingredients that are foundational for a thriving community. The city should consider its Air Quality and Land Use Planning report and Seattle's ADU FEIS for mitigation strategies that will appropriately balance housing capacity and health concerns, and ultimately create more housing options that generate healthy communities.

One recommendation from the report that is especially important from an environmental and health equity perspective is the application of a land use buffer within Air Pollution Exposure Zones (a minimum of 500 feet from high-volume roadways) for new sensitive land use capacity. To retain housing capacity along with a land use buffer, midrise housing should be considered in transit areas to gain more housing capacity for housing near transit.

Midrise Housing

Maximizing the use of lower-cost typologies like midrise apartments are an economically efficient way to bring more homes that are affordable to the city. Although subsidies are necessary for affordable housing production, midrise housing can reduce the subsidy required. The preferred growth strategy should prioritize midrise multifamily development, as recommended by the Department of Commerce's draft guidance. This will enable higher-cost cities, like Bellevue, to meet their housing needs for low-income individuals. Of the three alternatives, Alternative 3 aligns most closely with this goal by

O-69-2 See Common Response 4 Housing Alternatives.

O-69-3 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

O-69-4 See Common Response 4 Housing Alternatives. See Common Response 19 Zoning Details.

O-69-5 See Common Response 6 Noise. See Common Response 8 Air Quality/GHG. See Common Response 14 Equity and Environmental Sustainability Metrics.

O-69-6 See Common Response 8 Air Quality/GHG.

O-69-7 See Common Response 4 Housing Alternatives.

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RESPONSE

O-69-7 permitting midrise, mixed-use apartments near transit and neighborhood centers. The Future Land Use Map should be revised to incorporate midrise housing up to 8 stories, utilizing cost-effective wood-frame construction.

O-69-8 **Middle Housing**
Allowing middle housing across the city is essential for distributing growth equitably and providing more options for residents. Alternative 3 proposes legalizing duplexes, triplexes, and cottage housing throughout Bellevue. These options can create affordable rental and homeownership opportunities while maintaining the residential character and preserving green spaces which are important to residents. It is important to note that Alternative 3 must go further to increase the range of middle housing options permitted in the city to be in compliance with the newly adopted middle housing bill, HB 1110.

O-69-9 **Light Rail & Transit-Proximate Areas**
Bellevue growth and development planning for the next 20 years must carefully consider all light rail station areas throughout the city. The FEIS should assess the ½ mile walkable area around each light rail station as part of this analysis. This analysis should ultimately inform the development of the preferred alternative, which should allow for midrise housing or greater within the ½ mile walkable area of each light rail station.

O-69-10 **Displacement**
Many people of color and low-income households face the greatest risk of displacement. It is crucial that a growth strategy is pursued that mitigates these risks. In this analysis, it is also important to differentiate between physical and economic displacement. Physical displacement occurs through direct demolition, while economic displacement results when residents and businesses can no longer afford the rising rents and/or property taxes. The FEIS should quantify the expected impacts of each alternative on economic and physical displacement, going beyond a qualitative assessment. Households are especially susceptible to economic displacement when housing shortages lead to the bidding up of the price of existing homes. Understanding these impacts in depth will help develop appropriate anti-displacement strategies. The DEIS notes that because Alternative 3 creates more housing overall, including more affordable housing, it is expected to have the highest chance of reducing economic displacement as compared to other alternatives.

O-69-11 **Surplus Land and Land Acquisition Strategies**
Land costs significantly contribute to the rising costs of building affordable housing. Bellevue's work around the C-1 Affordable Housing Density Bonus has been a great opportunity to capitalize on affordable housing production opportunities. To complement this work, Bellevue should seek additional ways to leverage underutilized land. As part of the FEIS, the city should identify surplus or underutilized land and designate these sites for midrise housing.

O-69-12 **Development Standards**
Development standards such as setbacks, upper-level setbacks, modulation, and articulation can increase development costs and reduce the feasibility of capturing value for affordable housing. These standards also limit energy efficiency and hinder innovative construction methods. In the FEIS, we recommend not to advance development standards as mitigation measures for aesthetic impacts. This will enable more cost-effective and sustainable housing development.

O-69-8 See Common Response 4 Housing Alternatives.

O-69-9 See DEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-20. Most of the capacity for housing growth is in Mixed Use Centers, including the Preferred Alternative. Mixed Use Centers have good access to transit and other daily essentials. Many Mixed Use Centers have one or more light rail stops.

O-69-10 The EIS is an evaluation of a buildout scenario which will likely take more than the planning timeframe of 20 years to achieve, and the EIS also discloses that the environmental analysis utilizes a conservative approach with respect to this build out and impact analysis. The analysis of environmental impacts associated with the buildout scenario reflects the range of outcomes under the different growth alternatives studied in the EIS. See Common Response 14 Equity and Environmental Sustainability Metrics.

O-69-11 Identification of surplus land is outside of the scope of this EIS.

O-69-12 See Common Response 19 Zoning Details.

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COMMENT

RESPONSE

By considering these recommendations, Bellevue can make significant progress in promoting racial equity and ensuring housing affordability for all residents. We request that you involve our coalition in future planning and decision-making processes related to housing so the voices of the community can be heard during the planning and implementation.

Sincerely,

Mohamed Bakr
Executive Director, Muslim Community Network Association

Debbie Lacy
Executive Director, Eastside For All

Patience Malaba
Executive Director, Housing Development Consortium of Seattle-King County

Lalita Uppala
Executive Director, Indian American Community Services

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RESPONSE

O-70-1 Comment noted.

O-70-2 See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations in the Preferred Alternative. Action alternatives studied in the DEIS provide for additional intensity and range of uses in neighborhood centers, in consideration of the context, one of the components of which is the availability of transit service. Development potential is increased in all Action alternatives in areas of BelRed, Eastgate and Factoria. Policies and development regulations will be considered following the selection of a Preferred Alternative.

[NAIOP Letterhead]

June 12, 2023

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

Via email to CompPlan2044EIS@bellevuewa.gov

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement*

Dear Director Stead and Mr. Pittman:

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to comment on the City's Draft Environmental Impact Statement ("DEIS") for the Comprehensive Plan Periodic Update and Wilburton Vision Implementation that will shape the future of the City. NAIOP commends the City on embracing growth and thinking strategically about where and how the City should grow in the next two decades. By 2024, the City will undoubtedly look much different, and now is absolutely the time for bold action. We have reviewed the proposed DEIS and are impressed. It is a long document with much detail, but overall Alternative 3 provides a strong initial framework to locate growth in the City and meet its housing and jobs needs. We support advancing Alternative 3 to be the Preferred Alternative in the FEIS, with the noted changes below.

I. The City should adopt Alternative 3 as the Preferred Alternative, with modifications that add even more density within Mixed Use and Neighborhood Centers and the following additional modifications:

1. All commercially zoned land within Mixed Use or Neighborhood Centers that are near frequent transit currently or will be within a 10-minute walkshed of a future light rail station should be upzoned to allow for midrise housing. For the most part, Alternative 3 advances this approach, but we understand that transit proximity was not accounted for in identifying future land use map and zoning changes in Neighborhood Centers specifically. The Preferred Alternative must account for this, specifically in areas along the SR 520 corridor north of Bel-Red, immediately outside the Bel-Red subarea near Redmond's Overlake neighborhood, and in the I-90 corridor near Factoria and Eastgate. Additionally,

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the FEIS should study and, where necessary, eliminate neighborhood policies and historic concomitant agreements that frustrate the purposes of multifamily midrise zoning.

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There is a significant need for housing in Bellevue. The Preferred Alternative maintains the emphasis on housing around the 130th Light Rail Station. See Common Response 4 Housing Alternatives.

O-70-4

Areas OLB and OLB2 fall under the same future land use designation in the EIS analysis.

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2. The City should retain its model for Bel-Red that focuses office density near the 120th / Spring District Link station and residential density near the 130th Link station. We note that Alternative 3 includes significant expansion of the BR-RC zoning and only modest expansion of BR-OR zoning. The 120th station node is already established as a strong jobs center because of The Spring District, and this should continue in the future. As an alternative to expanding BR-OR-H-1 and -2 zoning designations, the City could modify the OR and CR designations to allow greater use flexibility with a "MU-H" designation. Specifically, the Preferred Alternative should also study getting rid of the minimum residential component in the BR-OR zoning that applies to large sites.

O-70-5

An additional category has been added to the Preferred Alternative studied in the FEIS: MU-L/M. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information about future land use designations.

O-70-4

3. The City should rezone all OLB areas in Eastgate to at least OLB2, and add additional height and density, to facilitate development for residential uses and student housing near Bellevue College

O-70-6

The areas designated BR-MO in the Preferred Alternative studied in the FEIS are the same as in Alternative 3. See DEIS Appendix B, *Land Use Patterns and Urban Form Appendix*, for more information on future land use designations.

O-70-5

4. MU-L and MU-M areas identified in the DEIS need to be rethought in terms of heights. The MU-L areas allow only between 2 and 4 stories, and the MU-L areas allow between 7 and 10 stories. Neither of these height designations correlate closely to specific construction types. More information in the FEIS should be provided to describe the types of development envisioned, and the MU-M areas should allow up to 85 feet plus for midrise residential to maximize "five over three" wood frame construction.

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Both an incentive-based model and an inclusionary model have been studied. See Common Response 4 Housing Alternatives.

O-70-6

5. Expansion of the BR-MO area is critical for Hospital-adjacent uses including preventative care, stem cell research, and medical office. The Preferred Alternative should consider expanding zoning that supports these uses in the 120th station node and in Wilburton to ensure there is sufficient flexibility to realize the needed development. The zoning should provide clear use designations that allow research and development labs, biotech incubators, medical office buildings, and life sciences campuses. Further, the Preferred Alternative should consider allowing residential uses in these areas to provide needed housing options for medical workers and patients who may travel to the area for treatment.

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See Common Response 4 Housing Alternatives.

O-70-7

II. The City's Preferred Alternative should study an incentive-based affordable housing model, not an inclusionary mandate.

O-70-8

1. Although we support advancing Alternative 3 to the Preferred Alternative, we do not support any mandatory inclusionary system for affordable housing. We believe the market functions best when affordable housing is incentivized, not

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O-70-9 Comment noted.

O-70-10 See Response to O-70-7.

O-70-11 See Common Response 19 Zoning Details.

O-70-12 See Common Response 8 Air Quality/GHG.

O-70-8

mandated. Between COVID, rising interest rates, inflation escalation, and the recent banking crisis, there are many headwinds to development and we are skeptical it is possible to design a mandatory inclusionary program that accounts for the complexities of the market. There are high risks of incorrect calibration—namely that development will not occur—that will result in Bellevue not meeting its goals and our regional housing crisis worsening. The Preferred Alternative should focus on an incentive-based affordable housing program that is legal and calibrated to incentivize housing development and affordable housing. The FEIS must further disclose the economic and development assumptions underlying any program, and it should provide unit creation assumptions so it is possible to evaluate whether the study of housing impacts is adequate.

O-70-9

2. We understand the City also intends to use the FEIS as a basis to implement the “Phase 2 LUCA” work on affordable housing. If true, that should be clearly disclosed in the FEIS, along with all economic and development assumptions. Again, we support incentives, not mandates, and the Phase 2 program should be calibrated to encourage overall housing development to occur.

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3. Further, as part of the Preferred Alternative, the City should consider the existing incentive systems across the City and identify if they can be updated to be (a) more consistent, and (b) more reflective of the City’s current priorities. We are confident that an incentive-based system can meet the City’s goals for producing affordable housing, especially at the 80-120% AMI level, but that must also be a goal of the system. There are areas of Bellevue, like Downtown, where this is not the current goal, so the priorities should be revisited if affordable housing creation is the City’s top goal.

O-70-11

III. Mixed Use areas should allow the market to control the uses that are constructed. Zoning codes function best when they are focused on height, bulk, and form standards and do not overregulate uses. As much as possible, we encourage the Preferred Alternative to move to “mixed use” designations that do not prescribe specific uses in specific areas. This will allow development to meet market conditions and the City’s needs over the full twenty-year planning horizon.

O-70-12

IV. The City should rely on TOD and the market to address Air Quality impacts, and not implement any buffers. The DEIS identifies an air quality impact from anticipated GHG emissions, yet the threshold of significance appears inapplicable and the analysis does not account for identified transportation mitigation measures like TDM programs and electric vehicles. The analysis should be updated to confirm whether there will be a significant impact or not. But, even if emissions rise to the level of significance, the City should remove air quality buffers from consideration as a mitigation measure. Owners want to build buildings with safe indoor ambient air quality, so they will already deploy both design and mechanical measures to ensure this is the case. Further, adding in such

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a buffer is directly contrary to the conversations around where density is most appropriate at the state level—which is proximate to transit—so such a buffer could frustrate compliance with future state legislative mandates.

O-70-13 See FEIS Chapter 11, *Transportation*, for additional information.

O-70-13

V. The FEIS should continue to focus transportation mitigation measures primarily on TDM programs, not adding street capacity.

O-70-14 Comment noted.

O-70-14

1. We are impressed with the transportation mitigation measures identified for Mixed Use Centers that focus primarily on multimodal connectivity and programmatic interventions like TDMs as this focus recognizes it is not possible to accommodate growth and build our way out of all traffic congestion with new streets.

O-70-15 The EIS does not analyze changes to the transportation network with the exception of the extension of NE 6th Street. See Common Response 1, BelRed Street Grid.

O-70-15

2. The DEIS transportation analysis does not appear to rely on the Bel-Red local street grid to support the transportation network. The FEIS should acknowledge this clearly, and should study removing the unopened portions of the grid as requirements on future development. Our members have consistently identified the street grid as a barrier to development that should be rethought in future zoning changes.

O-70-16 See Common Response 10 Wilburton Street Grid.

O-70-16

3. Similar to Bel-Red, we do not support adding streets to Wilburton unless they are shown to be a significant benefit to the transportation network. The Preferred Alternative should remove references and figures that imply streets, and instead focus on how to best mitigate any impacts using existing facilities. Although we recognize there is a concern about large block lengths in Wilburton, these will be naturally broken down by master planned developments in the future, and specific projects should have the flexibility to plan driveways, private streets and service alleys, and other pedestrian connections in the manner that best fits their development and contemporary surrounding uses. Further, at the land use regulation and planning level there needs to be clear policy guidance that any identified street or pedestrian pathway connections are conceptual only and there is a clear project-level path to modify and implement connections in the manner that best supports project development

O-70-17 See Common Response 5 Assumption of Buildout.

O-70-17

VI. The FEIS must disclose the City's actual assumptions related to density and dimensional standards and it should study modifying current standards that result in inefficient buildings and added cost.

We hear from our members that there are many development standards in current zoning in the City's Mixed Use Centers that add cost to development that is ultimately passed on to the end users. The FEIS should clearly state assumptions about development standards, and we recommend the City consider the following changes as the top priorities in the Preferred Alternative:

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O-70-18 See Common Response 19 Zoning Details.

O-70-19 See Common Response 19 Zoning Details.

O-70-20 See Common Response 19 Zoning Details.

O-70-21 See Common Response 19 Zoning Details.

O-70-22 See Common Response 16 Critical Areas.

O-70-23 See Common Response 18 Future Land Use Categories.

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1. Density limits:

- Eliminate residential FARs and dwelling unit per acre limits. Instead of these limits, residential development should be limited by height, bulk, and scale standards. Layering on additional density restrictions is another artificial limiter on housing production solely based on site size, and not desired building forms. This should be avoided. Incentive programs for affordable housing can be based on height, not FAR, similar to Downtown.
- Retain FAR standards for commercial development, but increase FAR to better align with proposed heights.

2. Floorplate size recommendations:

- The City's floorplate sizes are too low for efficient development to support various uses. Instead, the City should implement the following limits:
 - Residential: (a) unlimited below 85', (b) 28,000 gsf/f, plus connected floorplate allowances up to 160', (c) 13,500 gsf/f for 240' towers, and (d) 12,500 gsf/f for 450' towers.
 - Commercial: (a) unlimited up to 48', (c) 50,000 gsf/f up to 180', and (c) 24,000 gsf/f beyond 180'.

3. Parking minimums should be eliminated in all transit proximate areas, and areas within 1/2 mile of future light rail stops.

VII. The FEIS should identify modifications to the Critical Areas Ordinance to exclude man-made slopes from regulation. The City's current Critical Areas Ordinance ("CAO") treats all man-made slopes and rockeries as critical areas if they meet the City's size, height, and slope definition. This is true even if there are historic permits that approved the grading activities that created the slopes. These "slopes" do not have environmental value, and modern grading approaches and removing the slopes often results in safer geotechnical conditions. Sites with these features have reduced development capacity and constrained building configurations because of setbacks and buffers under the current code. This is not the right result. Consistent with existing Comprehensive Plan policies, the FEIS should identify removal of man-made steep slopes from regulation as part of Comprehensive Plan implementation.

VIII. The Preferred Alternative's Future Land Use Map Designations Must Be Streamlined. Last, we encourage the City to create more general Future Land Use Map designations as part of the FEIS and Comprehensive Plan update. This is allowed by the Growth Management Act, and would more easily facilitate future rezones and zoning changes.

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O-70-24 See Response O-70-23.

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We recommend different subareas are just identified with "Downtown," "Wilburton," or "Bel-Red" designations, or the City could simply use "Mixed Use Center" and "Neighborhood Center" designations, then it could identify implementing zones. This approach is frequently used in other jurisdictions to achieve more streamlined results in the interactions between Future Land Use Map and zoning designations.

Thank you for this opportunity to comment on behalf of our members. We are excited about working with the City to realize the growth it has identified for the next two decades. Please do not hesitate to contact me if you have any questions.

Sincerely,

Danielle Duvall, NAIOPWA Interim Executive Director

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COMMENT

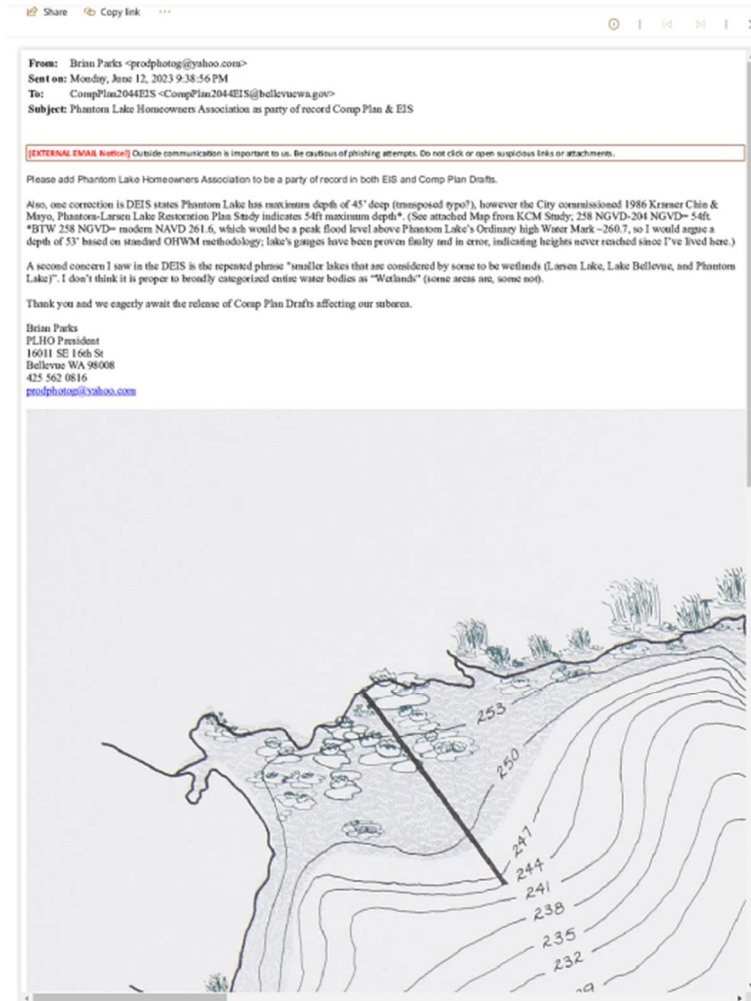
RESPONSE

O-71-1 Your organization has been added as a party of record.

O-71-2 See Common Response 20 Phantom Lake.

O-71-3 See Common Response 20 Phantom Lake.

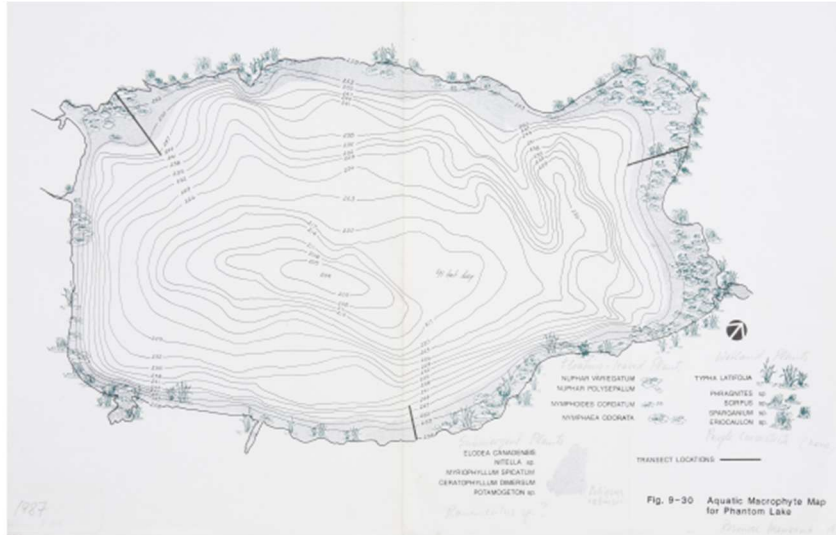
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COMMENT

RESPONSE



June 12, 2023

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

Re: Futurewise Comment on the Bellevue 2024 Draft Environmental Impact Statement

Dear Development Services Department:

Thank you for the opportunity to comment on the draft environmental impact statement ("DEIS") for the 2024 Periodic Comprehensive Plan Update at the City of Bellevue ("the City" or "Bellevue"). We will share our comment on the DEIS below.

Mission Statement

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Bellevue.

DEIS Comments

Based on the limited information provided, we believe that Alternative 3 is most likely to meet the goals and responsibilities of the City of Bellevue provided it fully complies with the Growth Management Act ("GMA"), Puget Sound Regional Council ("PSRC") VISION 2050, multicounty planning policies ("MPPs"), and King County Countywide Planning Policies ("CPPs") requirements, goals, and objectives. We recommend additional analysis to show how the alternatives comply, or do not comply, with the GMA, VISION 2050, MPPs, and CPPs.

Housing. Additional analysis is needed to meet new planning requirements under HB 1220. In alignment with Washington State Department of Commerce ("Commerce") guidance, we recommend that the City of Bellevue "plan for and accommodate housing affordable to all economic segments of the population" with the following analyses:

- **Inventory and analysis of all housing needs (draft guidance).** We appreciate that the City of Bellevue, through the December 2022 [Housing Needs Assessment](#) ("HNA"), documented projected housing needs for moderate, low, very low, and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing ("PSH"). Housing need inventory and analysis must be consistent with



O-72-1 All action alternatives, including the Preferred Alternative, have the potential to comply with GMA, Vision 2050 MPPs and King County CPPs. The EIS provides an analysis of the environmental impacts associated with the range of growth alternatives identified and studied in the EIS. The range of growth alternatives in the EIS incorporate and consider the requirements of the GMA, Vision 2050 MPPs and King County CPPs and disclose the environmental impacts associated with city compliance with those requirements. Additional analysis regarding the environmental impacts associated with the city's compliance with the GMA requirements, Vision 2050 MPPs, and King County CPPs is provided in the Final EIS, including in Chapter 7 (Housing) and Appendices Q and R. Specific policy details will be informed by the environmental analysis in the EIS and will comply with state law and align with regional planning documents as well.

O-72-2 See Common Response 4 Housing Alternatives.

O-72-3 The Comprehensive Plan will align with regional planning documents. Additional analysis regarding the environmental impacts associated with the city's compliance with applicable GMA requirements, HB 1220, and amended King County CPPs is provided in Chapter 7 (Housing) and Appendices Q and R.

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the CPP allocation through the Growth Management Planning Board and [ratified by the King County Council](#). This means that the alternative "gap analysis by affordability levels" methodology in the HNA cannot be used to update Bellevue's Comprehensive Plan.

- **Identify sufficient capacity of land for each income level and housing type, including special housing needs, based on current and proposed comprehensive plans and zoning (guidance).** City of Bellevue staff have indicated that this analysis is currently under review by Commerce. In advance of that feedback, we recommend that Bellevue consider some of the following implications of HB 1220:

- The housing element of the comprehensive plan must show sufficient capacity for each income level and housing type (including PSH, emergency housing, and middle housing) based on current zoning. The resulting analysis should relate zone designations and generalized zone categories to potential income levels and housing types, summarize residential capacity by zone category, and compare this capacity to projected housing needs. If a deficit is found, zoning actions must be implemented to increase capacity for one or more housing needs (income level and/or type).

O-72-4

Due to its economical form, low- and mid-rise wood frame housing types (4-8 stories) are most likely to provide housing affordable to 0-80% AMI households. According to the CPP allocations, Bellevue has a deep need for 0-80% AMI housing, with 29,646 units out of the total 35,000 unit growth target falling in this range. That represents 85% of Bellevue's growth target from 2019-2044.

We recommend that the City of Bellevue analyze each Alternative's ability to meet housing capacity requirements by income level with a special focus on low-rise and mid-rise wood frame construction typologies (4-8 stories). The analysis should include both affordable housing and market rate housing needs. Depending on the results of the analysis, this may require adjustments to the Future Land Use Map in the currently proposed DEIS Alternatives to accommodate additional mid-rise housing.

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- **Make adequate provisions for all housing needs, including documenting barriers to housing availability (guidance).** The updated GMA does not require jurisdictions to construct housing. However, jurisdictions are required to identify what kinds of barriers exist and programs and actions that, when implemented, have the potential to overcome barriers to housing production.

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- We appreciate the City's consideration of inclusionary zoning and incentives in the Alternatives as tools that can reduce barriers to, and increase funding for, 0-80% AMI housing.

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- To remove barriers to housing availability, we encourage the City to identify and consider a wider range of policies, funding, development regulations, and processes in addition to inclusionary zoning, existing incentives, and programs.

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The Comprehensive Plan will comply with the new requirements in the GMA that were added through HB 1220. The EIS discloses the environmental impacts associated with identified growth alternatives, which include Housing impacts related to the city's growth targets and city compliance with HB 1220, as codified in the GMA, and the King County Planning Policies addressing the requirements of HB 1220. Additional analysis regarding the environmental impacts associated with the city's compliance with applicable GMA requirements, HB 1220, and amended King County CPPs is provided in Chapter 7 (Housing) and Appendices Q and R. See also Common Response 4 Housing Alternatives.

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See Common Response 4 Housing Alternatives.

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Comment noted.

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See Common Response 19 Zoning Details.

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O-72-15

Housing tools will vary by market. Thus, Bellevue should study a contextualized range of housing tool options to understand what actions can remove barriers to housing. This analysis must be included in the Comprehensive Plan.

In particular, we suggest including a funding gap analysis to understand the relationship of existing funding tools and the need in the 0-80% AMI range. The market does not typically produce housing in this range and increased funding will be necessary to create this housing stock.

We also recommend exploration of surplus and land acquisition strategies. Land costs often represent a major barrier to housing development, especially for 0-80% AMI and special needs housing.

To remove barriers to housing availability, we encourage the City to identify aspects of the permitting process that limit housing, especially for lower AMI level housing and for types of housing such as permanent supportive housing, emergency housing, and emergency shelter. This should include an evaluation of the conditional use permit process for emergency housing and shelter now that the city has a better understanding of what constitutes a sufficient number of these housing types.

Housing policies, regulations, funding, and processes interact comprehensively. We therefore suggest a cumulative impact analysis of housing affordability tools to understand how they might function in totality vs. isolation.

- We thank the city for considering public transportation networks and employment locations in the growth alternatives. We agree with an approach that focuses more housing growth in areas that have high quality transit serving employment centers and areas of planned employment growth than elsewhere. This includes planning for housing types that are affordable to different segments of the local workforce.

Consider the wage level of jobs in the neighborhoods of Bellevue and the alignment with local housing affordability. Use [Census on the Map](#) to look at job counts and wage levels in census defined places.

We encourage Bellevue to map a ½ mile walkshed around future light rail stops to better understand the transit-proximate areas analysis. We further encourage Bellevue to consider a minimum zoning density around light rail stops that can accommodate mid-rise construction typologies (at least 4-8 stories), similar to the proposed provisions in [SB 5466](#). This can dually encourage transit-oriented development while creating capacity for zones compatible with 0-80% AMI housing development types.

- **Address racially disparate impacts, exclusion and displacement risk in housing through policies and regulations ([guidance](#)).** We look forward to reviewing the



O-72-8 See Common Response 4 Housing Alternatives.

O-72-9 Analysis of tools to address the funding gap for affordable housing is outside of the scope of this EIS.

O-72-10 Analysis of land acquisition strategies is outside of the scope of this EIS. Bellevue’s adopted Affordable Housing Strategy includes five strategies and 21 actions to increase the availability and access to affordable housing. Action C-2 focuses on opportunities to work in partnership with various agencies to develop affordable housing on suitable surplus public lands near transit hubs. Implementation of this action is ongoing.

O-72-11 Analysis of the city’s permitting process is outside of the scope of this EIS. As a part of the Affordable Housing Strategy and the prioritized “Next Right Work” actions, aspects of the permitting process that may limit housing are continually evaluated. Permitting process improvements for affordable housing is a focus of the “Next Right Work” actions, which aims to further increase housing production and affordable housing opportunities by making code improvements improving internal processes.

O-72-12 This type of analysis of housing affordability tools and mitigation measures is outside of the scope of the EIS. See Common Response 4 Housing Alternatives for more information on how housing was analyzed in the EIS.

O-72-13 Comment noted.

O-72-14 Each Action alternative analyzed in the DEIS provides the opportunity for significant development potential proximate to light rail stations (except the South Bellevue station where wetlands and steep slopes constrain development). Analysis of a minimum density around light rail is outside the scope of this EIS.

O-72-15 The Racially Disparate Impacts Analysis was released and is available on the Engaging Bellevue website at [engagingbellevue.com](#).

O-72

COMMENT

RESPONSE

Racially Disparate Impacts analysis that has been released in advance of the June 14th Planning Commission meeting. As the DEIS rightfully recognizes, this analysis is part of the new requirements in RCW 36.70A.070(2) that jurisdictions must now adopt into their housing element.

- o Depending on the results, the racially disparate impacts analysis may require adjustments to the Alternatives that can address and begin to undo identified racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. We recommend providing staff with the opportunity to adjust Alternatives based on the analysis findings.
 - For example, consider a hypothetical low-density neighborhood currently zoned single-family only. Consider also that this neighborhood has a documented history of racially restrictive covenants. If this neighborhood still has indicators of exclusion in housing—such as a smaller proportion of communities of color than the County or other parts of the City of Bellevue—then actions are required to document, address, and begin to undo this pattern of exclusion. Some policy options, recommended by Commerce on pg. 107 of their guidance, include:
 - Rezoning [to allow relatively more affordable housing types]
 - o “Zoning that may have a discriminatory effect” is specifically mentioned in RCW 36.70A.070(2)
 - Local programs to help build middle housing
 - Accessory dwelling units
 - Support programs that provide financial assistance and education to low-income homeowners

O-72-15

- o Consult impacted communities when assessing existing conditions, impact effects, and mitigation measures. VISION 2050 in MPP-DP-8 directs cities to “[c]onduct inclusive engagement to identify and address the diverse needs of the region’s residents.” Futurewise strongly recommends the City consult directly with members of the impacted communities for each type of environmental impact assessed in the DEIS. This engagement is especially pertinent in the racial disparate impacts analysis.

O-72-16

- o Based on the information provided in the available DEIS, we recommend that the City clarify the discussions and analysis on displacement. The DEIS should more clearly distinguish between the impacts of economic and physical displacement in each alternative. For example, lower growth targets may create less physical displacement but more economic displacement over time. The DEIS should also include cultural displacement impacts and distinguish between commercial and residential displacement. Knowing the type of displacement that has or is occurring is important for identifying policy or regulatory options to reduce the adverse impacts of displacement.

O-72-17

- **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.



O-72-16 See Common Response 14 Equity and Environmental Sustainability Metrics.

O-72-17 Comment noted.

O-72

COMMENT

RESPONSE

- **Physical displacement:** Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement falls into this category.
- **Cultural Displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Additionally:

- O-72-18
 - The City should demonstrate how alternatives comply, or do not comply, with HB 1110 requirements. While compliance for HB 1110 does not begin until 6 months after the 2024 CPPU, we recommend aligning the Bellevue Comp Plan with these requirements now to avoid a costly off-cycle update 6 months later.
 - We appreciate that the action alternatives look at residential targets higher than those provided by King County. The PSRC 'RGS-Action-8' provides that "Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement."
 - Considering bold alternatives for housing growth can help correct the housing-jobs imbalance we currently observe in Bellevue. We know that housing capacity is not equivalent with projected housing growth due to many factors like funding availability for low-income housing, market conditions, and the life-cycle stage of existing buildings on parcels. We believe that Alternative 3 will most realistically provide capacity for redevelopment to occur to meet Bellevue's 35,000 residential growth target provided it complies with the Growth Management Act, VISION 2050, the multicounty planning policies, and the countywide planning policies.
- O-72-19
 - **Climate Change and the Environment.** We appreciate the analysis in Appendix G that examines the relationship of climate change vulnerability to the Alternatives. This adequately analyzes climate change impacts.
- O-72-20
 - We encourage the city to consider the implications of the findings in Appendix J, and to consider air quality when planning for housing growth next to freeways. This is especially pertinent if air quality is expected to disproportionately negatively impact low-income and communities of color as Bellevue grows.
- O-72-21
 - **Transportation.** Futurewise appreciates that the DEIS uses a multimodal transportation analysis as the State Environmental Policy Act ("SEPA") and the GMA require. We recommend adding a discussion about how each Alternative complies, or does not comply, with the GMA, VISION 2050, MPP, and CPP goals and requirements.
- O-72-22
 - Futurewise recognizes the connection between transportation planning and climate change impacts. The [Washington State Department of Ecology](#) attributes nearly 40% of statewide annual greenhouse gas emissions to transportation. Emissions from on-road gasoline — personal cars and trucks — make up over half of total emissions in this category. As Bellevue continues the



- O-72-18 Please see Common Response 4 Housing Alternatives, which explains how the FEIS provides additional analysis of the environmental impacts associated with city compliance with the requirements of HB 1110.
- O-72-19 Comment noted.
- O-72-20 See Common Response 15 Climate Change and State Planning Framework.
- O-72-21 See Common Response 8 Air Quality/GHG.
- O-72-22 See FEIS Chapter 11, *Transportation*, for additional information. See DEIS Chapter 4, Plans and Policies, for information on how each Alternative complies with the plans listed.
- O-72-23 See Common Response 8 Air Quality/GHG.

O-72

COMMENT

RESPONSE

O-72-23

transition from a suburban jurisdiction to a more urban one, we understand the importance of simultaneously transitioning the transportation network from a car-centric model to a multimodal model with increased investments in biking, walking, and public transportation infrastructure. Futurewise recommends that the EIS:

- Emphasize transportation investment and mitigation strategies that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers (VISION 2050, MPP-T-12).
 - Based on the provided analysis in the DEIS, vehicle miles traveled (“VMT”) increases for Action Alternatives. We recommend exploring additional mitigation measures through dense, mixed-use land use patterns and locating growth close to jobs to further reduce VMT. We also recommend more transportation investments and allocation of street space that prioritize active transportation and transit alternatives to single occupancy vehicle trips.
- Increase the proportion of trips made by transportation modes that are alternatives to driving alone... by ensuring availability of reliable and competitive transportation options (VISION 2050, MPP-T-13).
 - We appreciate that other transportation modes, like walking and biking, are expected to increase in Action Alternatives.

O-72-24

In some alternatives, however, transit mode usage for Bellevue workers is expected to decrease. Consider mitigation measures and supporting the ongoing implementation and expansion of transportation demand management strategies and programs, such as those mentioned in the DEIS.

O-72-26

On page 11-122, the DEIS states that added density in Alternatives 1-3 will result in higher mode shares for walking, cycling, and transit than the No Action Alternative. However, the transportation model shows only very small increases for these modes from the higher density alternatives and shows a steep drop in carpooling, leading to an overall increase in single occupancy vehicle mode share. The city should explain why the transportation model shows these mode share outcomes in seeming contradiction of its own assertions. If this outcome is the result of an error in the model, this error should be corrected.

O-72-27

We challenge the City of Bellevue to consider the implications of certain planning goals, such as the 2.0 ‘transit travel time ratio’ performance target set in the Mobility Implementation Plan. This performance target ratio would mean that a transit trip takes no more than twice as long as the trip made by private vehicle. This goal seems insufficiently ambitious to ensure availability of reliable and competitive multimodal transportation options. In dense urban areas, transit with dedicated right of way is the only transportation option that provides rapid mobility to large numbers of people. In such locations, transit travel times are faster than private vehicle travel times. As Bellevue adds more residents and



O-72-24 See Common Response 8 Air Quality/GHG. See Common Response 15 Climate Change and State Planning Framework.

O-72-25 See FEIS Chapter 11, *Transportation*, for more information on transportation options.

O-72-26 The FEIS includes revised transportation impacts for the No Action Alternative and the Action Alternatives in addition to the estimated impact under the Preferred Alternative. Based on the updated modelling results, the vehicle mode share only increases relative to other modes for the Preferred Alternative. For Alternatives 1-3, the walking, bicycling, and transit mode shares increase relative to other modes. See FEIS Chapter 11, *Transportation*, for more information.

O-72-27 See FEIS Chapter 11, *Transportation*, for more information.

O-72

COMMENT

RESPONSE

O-72-27 | workers, transit will need to be given greater priority to maintain overall mobility in corridors with limited space for additional lanes. Setting an unambitious transit goal will reduce the emphasis on transit in the consideration of mitigation strategies.

O-72-28 |

- Avoid mitigation strategies that do not minimize the environmental impact of transportation (VISION 2050, MPP-T-8), such as road expansions. Instead, prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian- and transit-oriented densities and development (VISION 2050, MPP-T-15). Road widening will not help Bellevue achieve the goals of MPP-T-15. Additionally, increased vehicle traffic and vehicle speeds are a barrier to pedestrian and bicycle safety. Road diets should be considered instead as mitigation strategies for corridors with significant traffic safety impacts.
- Prioritize transportation safety in alignment with the VISION ZERO initiative goal of eliminating traffic deaths and serious-injury collisions on city streets by 2030 and VISION 2050 MPP-T-3.

O-72-29 | Safety is an important metric for transportation impacts. Bellevue should provide more detailed information on the geographic distribution of vehicle collisions than is provided in figure 11-22. In the current figure, collisions on I-90 and I-405 interchanges obscure patterns of collisions on city streets. Separating out collisions on city streets from collisions on grade-separated interstate highways and separating out collisions with more vulnerable street users like people walking or riding bicycles will show a clearer picture of where actions can be taken to increase safety that are under the City of Bellevue's control.

O-72-30 | Additionally, Bellevue should consider the implications of using vehicle travel speed as a positive environmental metric. Increased vehicle speeds increase the chance that a collision will lead to serious injury or death. This is especially concerning when Bellevue sets higher speed requirements for residential neighborhoods where children are more likely to be crossing the street and vulnerable to being hit by a car traveling at high speeds. In fact, increased safety at intersections inherently slows vehicle traffic.

O-72-31 |

- We recommend that Bellevue analyze impacts to Eastrail and the Grand Connection that might result from a NE 6th St extension to 120th Ave NE.



O-72-28 | The Bellevue Mobility Implementation Plan provides the vision for a complete and connected transportation network throughout the city. The Bike Bellevue Project is intended to describe design concepts that may include repurposing of existing travel lanes for bicycle corridors in the urban core (Downtown, BelRed, Wilburton).

O-72-29 | Comment noted.

O-72-30 | Comment noted.

O-72-31 | Please see Common Response 1 Non-Project EIS vs. Project-Level SEPA Review.

Thank you for considering our comments. If you require additional information, please contact me at telephone 253-886-2099 or email brady@futurewise.org.

Sincerely,

Brady Nordstrom
Eastside Program Coordinator, Futurewise

T-1

COMMENT

RESPONSE



DUWAMISH TRIBE
dx^wdəwʔabš

06/01/2023

City of Bellevue
2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

Dear Elizabeth Stead,

Thank you for the opportunity to comment on the draft environmental impact statement for the above named project. Bellevue, particularly Kelsey Creek and Meydenbauer Bay, are culturally significant places for the Duwamish and other tribes. Near the outfalls of the Mercer Slough and Coal Creek was a village site along the shores of Lake Washington. Prior to the creation of a permanent cut between Lake Washington and Lake Union and the Ballard Locks, the shore of Lake Washington filled in what is now the nature park at Mercer Slough. These areas were places where the Duwamish canoed, fished, hunted and gathered resources for food and materials to make clothings, mats, shelter and tools to hunt and fish.

The following elements of the environment from Table 1-2 were of most concern to the Tribe; air quality, noise and aesthetics. The Tribe would support Alternative 0 for those elements of the environment and Alternative 1 for transportation.

Element of the Environment	Alternative 0	Alternative 1	Alternative 2	Alternative 3
Air Quality	✓	X	X	X
Noise	✓	X	X	X
Summary of aesthetics including urban form, viewsheds, shadows, light and glare	✓	X	X	X
Transportation	X	✓	X	X

In addition, the density of net housing capacity was of concern for Alternatives 1, 2 and 3. These projections illustrated by the maps put additional environmental stress on streams and wetlands and their buffers. If impervious surfaces replace these environmentally sensitive areas, this decreases native vegetation for humans, native aquatic life, wildlife, birds and pollinators while potentially increasing seasonal urban flooding.

Thank you,
Duwamish Tribe Cultural Preservation



Duwamish Tribal Services | 4705 W. Marginal Way SW, Seattle, WA 98106 | 206-431-1582
www.duwamishtribe.org

T-1-1

See Common Response 6 Noise. See Common Response 8 Air Quality/GHG. See DEIS Chapter 6, *Aesthetics*, for more information.

T-1-2

Existing policies call for natural stream corridors to be protected and rehabilitated as development/redevelopment occurs. See Common Response 2 Tree Canopy. See Common Response 3 Water Quality. See Common Response 9 Plants and Animals. See Common Response 16 Critical Areas. See Common Response 21 Stormwater Infrastructure.

T-1-1

T-1-2

INTENTIONALLY BLANK

An illustration at the top of the page shows a stylized tree with a brown trunk and green leaves. Three silhouetted figures are shown: one on the left holding a banner, and two on the right reaching up to pick orange fruit from the tree. The background is a light blue sky with a white cloud and a dark blue mountain range silhouette. A large white number '0' is positioned on the right side of the illustration.

BELLEVUE 2044
COMPREHENSIVE PLAN

Building A Livable City for All

APPENDIX 0 **Urban Tree Canopy Assessment**

URBAN TREE CANOPY
ASSESSMENT

BELLEVUE, WASHINGTON

DECEMBER | 2023



AN ASSESSMENT OF
URBAN TREE CANOPY IN
**BELLEVUE,
WASHINGTON**



To be without
trees would,
in the most
literal way, to be
without our roots.

-Richard Mabey



PREPARED BY

PlanIT Geo, Inc., Wheat Ridge, Colorado

PREPARED FOR

City of Bellevue

COMPLETED

December 2023



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8,499
ACRES OF CANOPY

40%
OF BELLEVUE'S LAND
AREA WAS COVERED
WITH CANOPY IN 2021

EXECUTIVE

SUMMARY

BACKGROUND OF THIS ANALYSIS

The City of Bellevue is located within King County, Washington, in the Seattle metropolitan area (Figure 1). It is approximately 33.8 square miles or 21,623 acres. Flourishing woody neighborhoods and expansive network of trails have earned Bellevue its nickname "a city in a park". Bellevue has been a proud Tree City USA recipient for 32 years and acknowledges that a healthy and thriving urban forest is integral in providing residents with meaningful environmental, social, and economic benefits.

As established in Bellevue's Comprehensive Plan, the City has a goal of achieving a tree canopy of at least 40%, and has policies to promote tree preservation, planting, and tree protection. The Sustainable Bellevue Environmental Stewardship Plan seeks to advance these goals with actions to increase outreach and education, improve tracking, and update Bellevue's tree code, among others. This assessment mapped urban tree canopy (UTC), possible planting area (PPA), and analyzed how they are distributed throughout the City of Bellevue and its many geographic boundaries. Canopy size, extent and distribution was quantified, however this analysis does not attempt to define species composition or condition.

For the purpose of this report, urban tree canopy refers to the percentage of tree canopy coverage compared to the City's total land area, excluding water bodies.

PROJECT METHODOLOGY

The results, based on 2021 imagery from the USDA's National Agriculture Imagery Program (NAIP), provide a near-current look at land cover in Bellevue and will allow the City to revise existing and develop new strategies to protect and expand the urban forest. This study utilized modern machine learning techniques to create land cover data that are reproducible and allows for a more uniform comparison in future tree canopy and land cover assessments.

CITY OF BELLEVUE'S URBAN FOREST

In 2021, Bellevue contained 40% urban tree canopy cover, 20% possible planting area, and the other 40% of the City was classified as unsuitable for planting without significant land modification.

Of the six land use classes within Bellevue, Suburban Residential constituted 66% of Bellevue's land area, 64% of the citywide canopy distribution, and 77% of citywide PPA. The right-of-way (ROW) comprised 18% of the City's total area and contributed 10% towards the total canopy cover. Out of Bellevue's 16 neighborhoods, Lake Hills contained the greatest potential for canopy expansion, offering 555 acres of PPA or 13% of the City's total plantable space. The tree canopy in 2021 increased from 2019 by 0.2% to 40%. This assessment illustrates that despite some losses of trees due to development or other tree removals, the overall growth of the tree canopy surpasses any localized removal of trees, resulting in a net increase in citywide tree canopy.

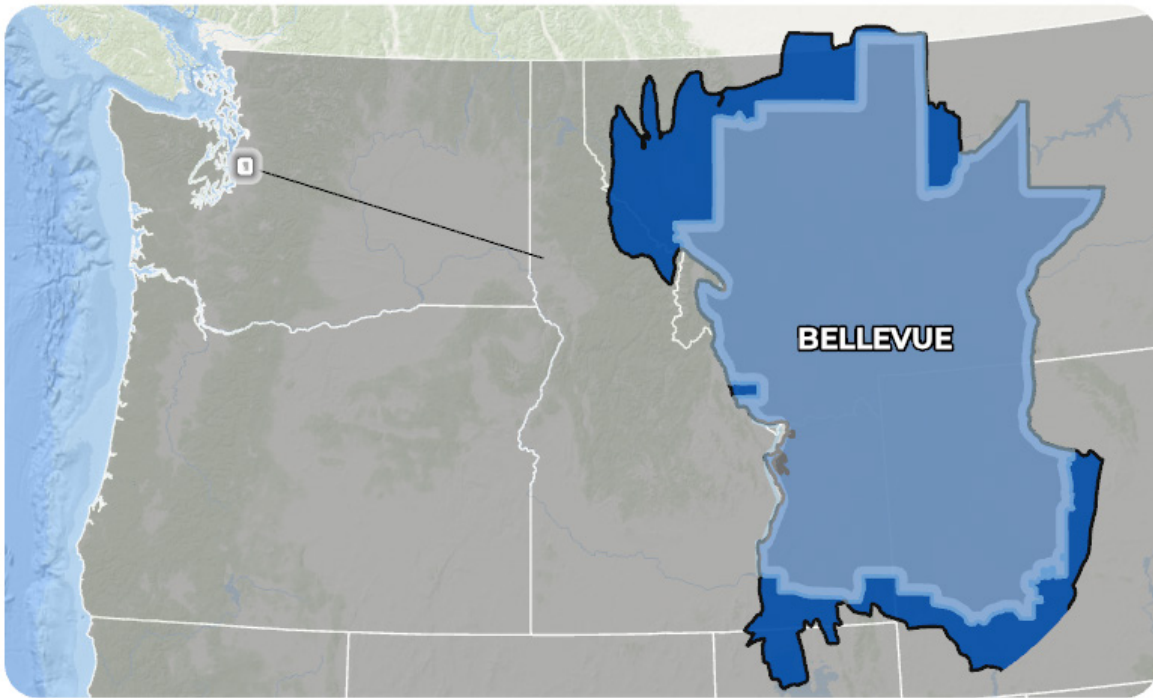


Figure 1. | Bellevue occupies approximately 33.8 square miles in King County, Washington.

RECOMMENDATIONS

The results of this analysis can be used to develop a continued strategy to protect and expand Bellevue's urban forest. This study revealed that the City of Bellevue contains 8,499 acres of tree canopy, with more than 4,300 acres potentially available for canopy expansion. Bellevue has the opportunity to continue to increase urban tree canopy coverage on both public and private property. There are over 370 acres of plantable space along Bellevue's stream corridors areas and an additional 510 acres of PPA within the right-of-way. Through partnerships, education, and outreach programs to private landowners, the City of Bellevue can aim to plant native species to stabilize riparian corridors, address tree inequity, and mitigate the urban heat island effect. It is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City should proactively work to protect the existing urban forest and replenish the canopy with additional trees and native shrubs and remove invasive species when possible. Through management actions, strategic plantings, and protections for existing canopy informed by the UTC and PPA metrics included in this report, the City of Bellevue has an exciting opportunity to expand the quality and quantity of its current urban tree canopy for the benefit of future generations.

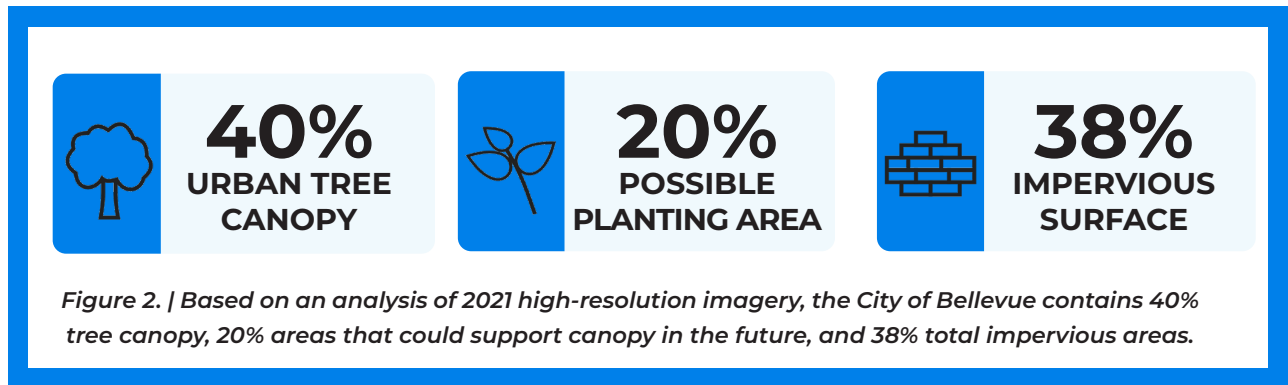


Figure 2. | Based on an analysis of 2021 high-resolution imagery, the City of Bellevue contains 40% tree canopy, 20% areas that could support canopy in the future, and 38% total impervious areas.

PROJECT

METHODOLOGY

Land cover, urban tree canopy, and possible planting areas were mapped using the sources and methods described below. These data sets provide the foundation for the metrics reported at the selected geographic assessment scales.

DATA SOURCES

This assessment utilized high-resolution (60-centimeter) multi-spectral imagery from the U.S. Department of Agriculture's National Agriculture Imagery Program (NAIP) collected in July of 2021 to derive the land cover data set. The NAIP imagery was used to classify all types of land cover. For canopy change analysis, 60 centimeter resolution NAIP imagery collected in October of 2019 and 1-meter resolution data was collected in August of 2011 to classify the historic tree canopy.

MAPPING LAND COVER

The land cover data set is the most fundamental component of an urban tree canopy assessment. Tree canopy and land cover data from the EarthDefine US Tree Map (<https://www.earthdefine.com/treemap/>) provided a six class land cover data set. The US Tree Map is produced using a modern machine learning technique to extract tree canopy cover and other land cover types from the latest available 2021 NAIP imagery. These six classes are shown in Figure 3 and described in the Glossary found in the Appendix.

Given the difference in resolutions between the datasets, specifically between 2011 and the subsequent years, it is worth considering whether this discrepancy could account for any observed differences in tree canopy coverage. Additionally, data collected in October of 2021 may have capture "leaf off" imagery, where trees have shed their leaves. This seasonal variation could also potentially influence the canopy analysis, possibly accounting for observed differences in tree canopy coverage when compared with data from other years.



Figure 3. | Six (6) distinct land cover classes were identified in the 2021 tree canopy assessment: urban tree canopy, shrubs, other vegetation, bare soil and dry vegetation, impervious surfaces, and water.

IDENTIFYING POSSIBLE PLANTING AREAS AND UNSUITABLE AREAS FOR PLANTING

In addition to quantifying the City of Bellevue’s existing tree canopy cover, another metric of interest in this assessment was the area where tree canopy could be expanded. To assess this, all land area in the City of Bellevue that was not existing tree canopy coverage was classified as either possible planting area (PPA) or unsuitable for planting.

Possible planting areas were derived from the vegetation and shrubs layer. Unsuitable areas, or areas where it was not feasible to plant trees due to biophysical or land use restraints (e.g. golf course playing areas, recreation fields, utility corridors, airports, etc.) were manually delineated and overlaid with the existing land cover data set (Figure 4). The final results were reported as PPA Vegetation, Unsuitable Impervious, Unsuitable Vegetation, Unsuitable Soil, and Water.

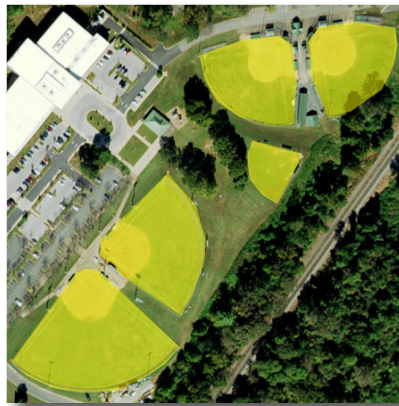
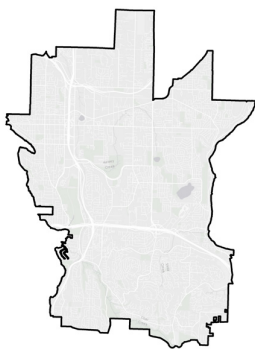


Figure 4. | Vegetated areas where it would be biophysically feasible for tree plantings but undesirable based on their current usage (left) were delineated in the data as “Unsuitable” (right). These areas included recreational sports fields, golf courses, and other open space.

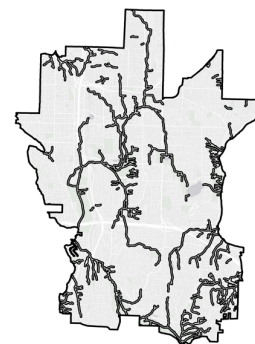
DEFINING ASSESSMENT LEVELS

In order to best inform Bellevue and its various stakeholders, urban tree canopy and other associated metrics were tabulated across a variety of geographic boundaries. These boundaries include the City boundary, land use classes, neighborhoods, stream corridors, drainage basins, schools, census block groups, and right-of-way by census block groups.



CITY BOUNDARY

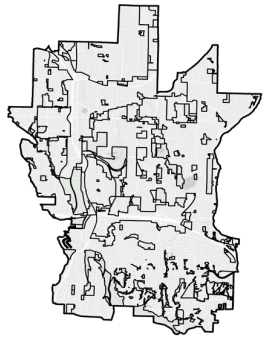
The City of Bellevue’s **citywide boundary** is the one (1) main area of interest over which all metrics are summarized.



STREAM CORRIDORS

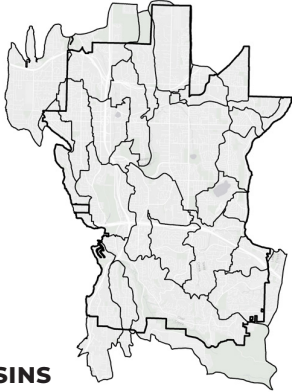
Stream corridors play an important role in urban environments. Tree canopy within 100 feet of streams was assessed.

Figure 5. | Eight (8) distinct geographic boundaries were explored in this analysis: the full City boundary, designated land use classes, neighborhoods, stream corridors, drainage basins, schools, census block groups, and right-of-way by census block groups.



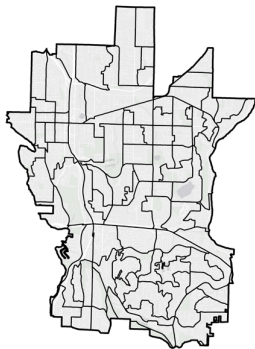
LAND USE

Six (6) **land use** classes were assessed to review the extent to which human interactions caused significant changes in the City's structure, pattern, and function of natural ecosystems.



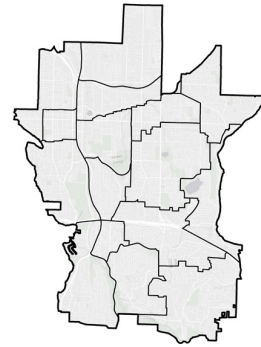
DRAINAGE BASINS

Because trees play an important role in storm water management, twenty-eight (28) **drainage basins** were also assessed. The boundaries for drainage basins extend beyond City boundaries.



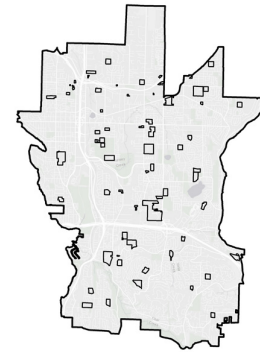
CENSUS BLOCK GROUPS

Eighty nine (89) **census block groups** were assessed to show relationships between canopy and sociodemographic factors, and highlight potential environmental justice issues.



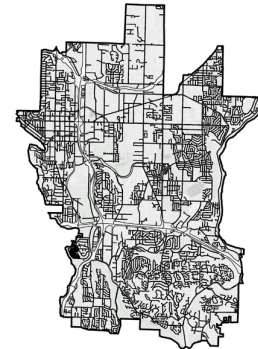
NEIGHBORHOODS

Sixteen (16) **neighborhoods** were assessed to quantify urban tree canopy at an easily- conceptualized scale.



SCHOOLS

UTC was assessed for all of the **schools** in Bellevue, totaling eighty-one (81).



RIGHT-OF-WAY BY CENSUS BLOCK GROUP

In addition to the UTC throughout the census block groups' entire areas, UTC was also assessed within the **right-of-way found within each census block group**. This measure is useful for quantifying and tracking Bellevue's street trees.

Figure 5. | Eight (8) distinct geographic boundaries were explored in this analysis: the full City boundary, designated land use classes, neighborhoods, stream corridors, drainage basins, schools, census block groups, and right-of-way by census block groups.

STATE OF THE CANOPY AND --- **KEY FINDINGS**



The results and key findings of this study, including the land cover map and canopy analysis results, are presented below. These results can be used to design a strategic approach to identifying existing canopy and future planting areas. Land cover percentages are based on the City Boundary as of 2021. The City boundary includes six land cover classes including tree canopy (over impervious surfaces and over pervious surfaces), shrub/scrub, soil and dry vegetation, other vegetation, impervious surfaces, and water (see Table 1 and Figure 6 for the breakdown of percentages). While citywide urban tree canopy includes urban tree canopy, PPA vegetation, unsuitable impervious, unsuitable soil (see Figure 8 for the breakdown of percentages).

Table 1. | Land cover classes in acres and percent in City of Bellevue.

Bellevue, WA	Acres	% of Total
City Limits	21,623	100%
Tree Canopy	8,499	40%
Possible Planting Area	340	20%
Unsuitable Area	4,126	40%

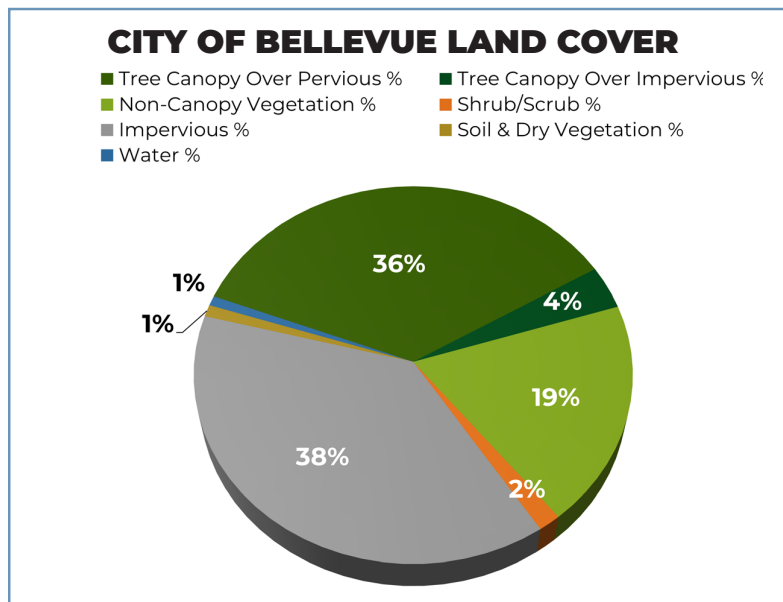


Figure 6. | Land cover classification results (percentages based on total area of Bellevue including water bodies).

CITYWIDE URBAN TREE CANOPY

This tree canopy assessment utilized the land cover data as a foundation to determine tree canopy cover and possible planting areas (PPA) throughout Bellevue. After assessing the City's 21,442 land acres, almost half (40%) of the study area was covered with canopy, with more than 4,300 acres still available to plant more trees. If the City utilizes all of its plantable space, it would theoretically have the potential to reach 60% tree canopy cover. This theoretical limit can be used to help the City set realistic goals regarding canopy expansion.

However, not all of the land area is feasible or readily available for trees. About 38% of the City is covered with impermeable surfaces such as roads and parking lots. While a greater investment, tree canopy adjacent to and over impervious surfaces can have the greatest impact in terms of reducing urban heat island effect. There is also another 2% composed of recreational sports fields, areas of bare soil and dry vegetation.



Land Cover Classification

Non-Canopy Vegetation	Tree Canopy
Soil and Dry Vegetation	Shrub
Impervious	Tree Canopy Over Impervious
Water	



Figure 7. | Distribution of land cover throughout Bellevue.

URBAN TREE CANOPY POTENTIAL **UNSUITABLE FOR PLANTING**

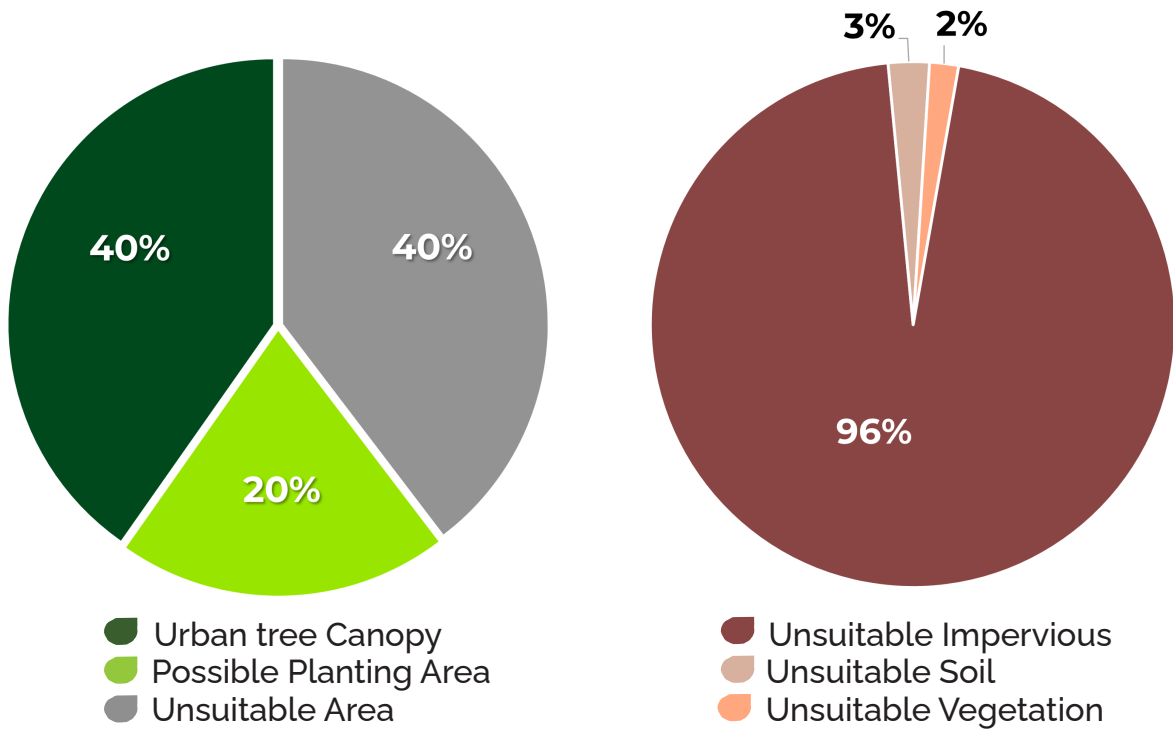


Figure 8. | Urban tree canopy, possible planting area, and area unsuitable for UTC (right). Total unsuitable area broken down by unsuitable soil, unsuitable impervious, and unsuitable vegetation percentages (left).

The presence and expansion of impervious surfaces, such as asphalt and concrete roadways, parking lots, driveways, sidewalks, and buildings, are the largest factor limiting the City's potential to increase its overall canopy coverage. However, these areas are the typically the most in need of additional canopy, to reduce urban heat island and improve stormwater quality.

A NOTE ON CANOPY AND IMPERVIOUS SURFACES



The City's 8,499 acres of urban tree canopy were further divided into subcategories based on whether the canopy was overhanging pervious or impervious surfaces. Tree canopy overhanging an impervious surface offers many ecological advantages such as localized cooling through shading and increased storm-water absorption. Results indicated that the City of Bellevue's UTC was predominantly overhanging pervious surfaces at 91%, while 9% was overhanging impervious surfaces. Planting trees in rights of ways, along streets and sidewalks, and in other public areas, as well as strengthening ordinances for planting around parking lots in new developments can help to offset the negative effects of impervious surfaces, such as urban heat island.

In addition to assessing Bellevue’s urban tree canopy using 2021 imagery, this study also quantified shifts in urban tree canopy by utilizing imagery from both 2019 and 2011. Previous studies conducted in 1998 and 2008 by American Forests determined that the City was losing its valuable tree canopy and the associated ecosystem benefits that trees provide at alarming rates, with a 12% loss in canopy from 1986-1996 and another 9% loss in canopy from 1996-2006. Much of these changes in the 1980’s and 1990’s were due to development and expansion of new single-family neighborhoods in previously undeveloped parts of Bellevue. However, the downward trend appears to have been reversed.



Bellevue experienced a net increase in canopy (450 acres) from 2011 to 2021.

In this comprehensive study, maps of land cover and urban tree canopy in 2011, 2019, and 2021 were produced using identical classification methodologies. All assessments used machine learning techniques on high-resolution (60 cm when feasible and 1-meter for 2011) color-infrared aerial imagery. Changes were assessed at all of the geographic assessment scales (citywide, land use, neighborhoods, stream buffers, drainage basins, schools, census block groups, and rights-of-way by census block groups). The most current boundaries were assessed in all years despite the fact that several of the geographic assessment scales may have changed due to annexation, population changes, and other land use reconfigurations since 2011.

CITYWIDE URBAN TREE CANOPY CHANGE

Over the 10-year study period, there was an overall increase in Bellevue’s urban tree canopy. Tree canopy increased by 410 acres citywide, a 1.9% raw increase from 2011 to 2019, and continued to increase by 40 acres between 2019 and 2021 resulting in an average canopy gain of 45 acres per year throughout the entire 10-year study period. This overall increase of 450 acres (+2.1%) of tree from 2011 to 2021, is a dramatic improvement from the upwards of 20% that was lost between 1986 and 2006.

However, it can be safely assumed that the tee canopy fluctuated, at least to some extent, throughout this analysis time frame. This assessment serves as a snapshot of the canopy at the time of imagery collection. Additionally, the extent to which invasive species (both trees and shrubs) are adding to this observation has yet to be assessed.

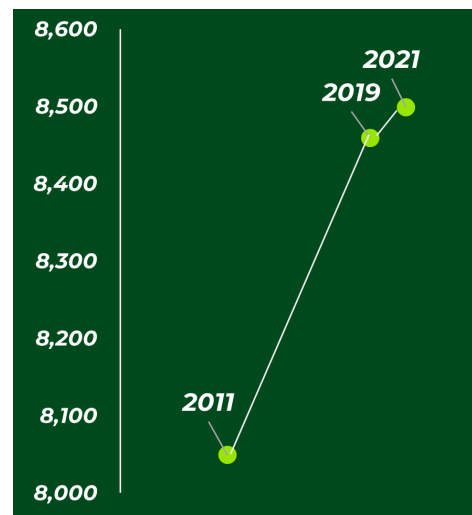


Figure 9. | Urban tree canopy in 2011, 2019, and 2021.

Generally, most losses of canopy can be traced back to commercial and residential developments near the I-405 corridor. Canopy growth can be attributed to the growth of existing trees, natural regeneration, and tree plantings in new residential and commercial development projects. Current levels of urban tree canopy in Bellevue can continue to be improved with careful planning and planting efforts of native species.

Table 2. | Urban tree canopy in 2011, 2019, and 2021.

City of Bellevue	Land Area	UTC 2011		UTC 2019		UTC 2021		UTC Change (2011-2021)	
	Acres	Acres	%	Acres	%	Acres	%	Acres	%
Urban Tree Canopy	21,442	8,051	37%	8,461	39%	8,499	40%	450	+2.1%

URBAN TREE CANOPY BY DESIGNATED LAND USE

Urban tree canopy was assessed for the City of Bellevue’s designated land use classes. Suburban Residential districts were by far the largest, and therefore the most significant, of the land use classes, representing 66% of Bellevue’s land area. So unsurprisingly, Suburban Residential land use had the most trees in total with 5,460 acres of canopy, which equates to 39% of its land area. However, areas designated for Parks had the highest canopy coverage, with 75% of all park area covered by tree canopy. Central Business District areas had the least amount of trees, with only 11% of its land area occupied by trees.

In terms of PPA, Suburban Residential land use area led with 23% or 3,611 acres available for new trees. So, Suburban residential areas contributed the greatest amounts of both UTC and PPA towards the citywide totals, making up 64% of the City’s UTC and 77% of all PPA in Bellevue. Both Industrial and Parks land use areas also had significant PPA available within their boundaries with 18% and 17% respectively.

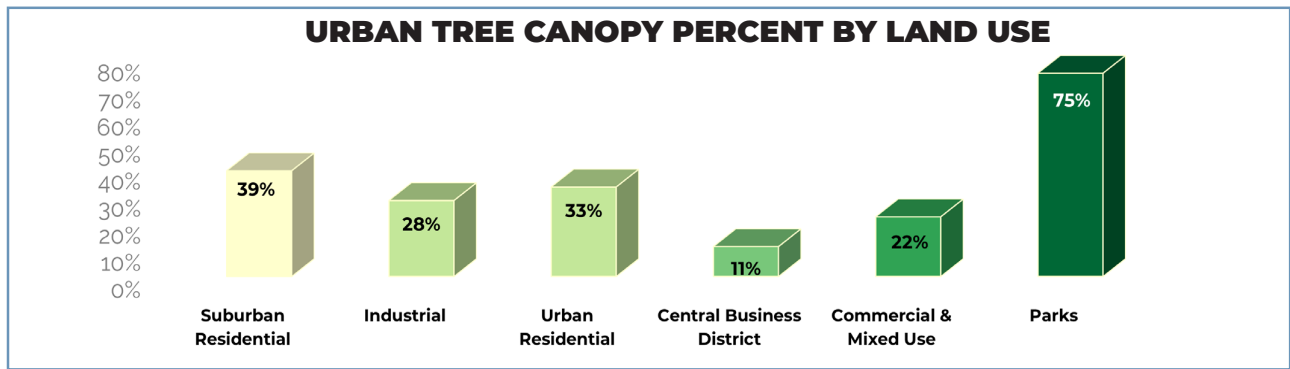


Figure 10. | Urban tree canopy assessment results by land use classes in 2021.

URBAN TREE CANOPY CHANGE BY DESIGNATED LAND USE

Dividing the urban tree canopy change results by the City’s designated land use categories offered some additional insights as to how Bellevue’s canopy has changed over time. Bellevue’s Industrial areas were the only land use type that had a net loss of canopy throughout the 10-year study period (-4 acres or a 2% loss). While areas designated for Central Business Districts only make up 2% of Bellevue’s total area, these areas experienced the largest percentage increase in canopy during the 10-year study period, from 6% (25 acres in 2011) to 11% (42 acres in 2021). Despite Parks experiencing a 2% loss of its canopy during the initial study period (2011 to 2019), the downward trajectory of canopy seems to be reversed. Between 2019 and 2021 Parks gained 62 acres of canopy.

Although Suburban Residential areas showed an overall gain during the entire ten year study period (+311 acres, the largest acreage gain of all land use types), it lost 65 acres of canopy from 2019 to 2021. In fact, this was the only land use type to lose canopy in the most recent three year research interval. This example shows the dynamic nature of Bellevue’s tree canopy. Its important for Bellevue to continue to monitor canopy in Suburban land use areas to ensure that this is not the start of a downward trend.

URBAN TREE CANOPY CHANGE BY LAND USE FROM 2011 TO 2021 (ACRES)

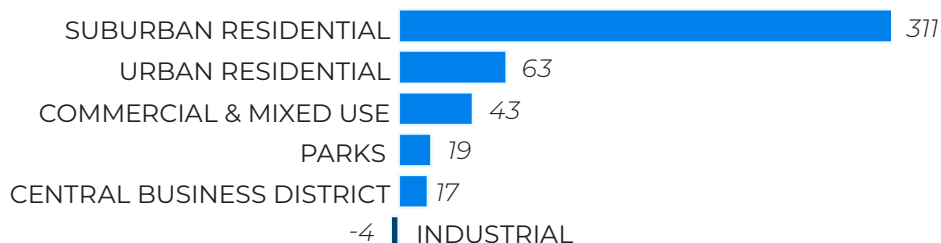


Figure 11. | Urban tree canopy change by designated land uses in Bellevue from 2011-2021.

URBAN TREE CANOPY CHANGE BY LAND USE FROM 2019 TO 2021 (ACRES)

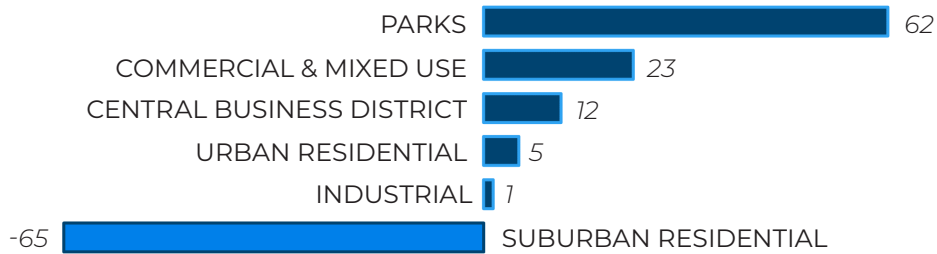


Figure 11. | Urban tree canopy change by designated land uses in Bellevue from 2011-2021.

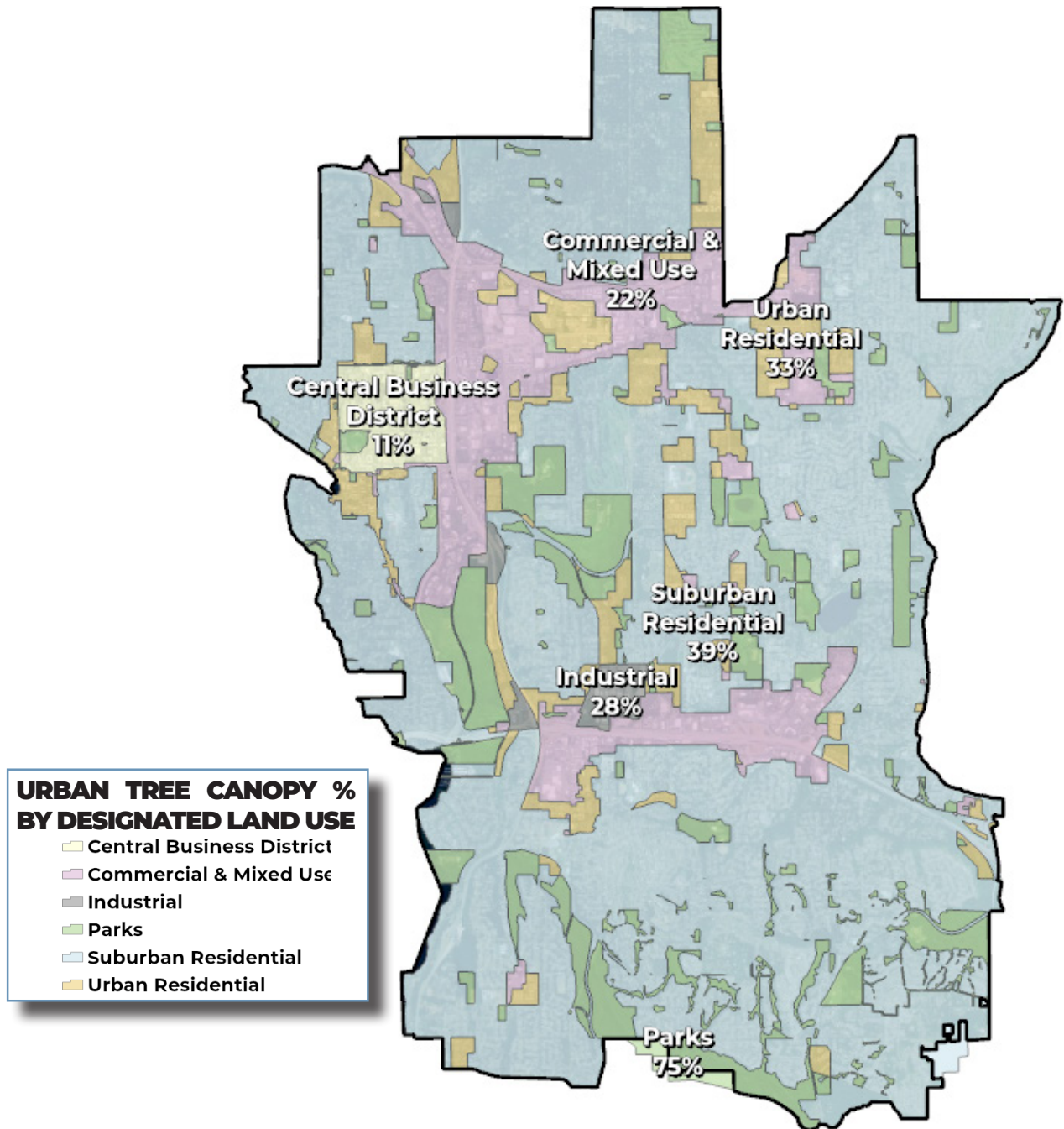


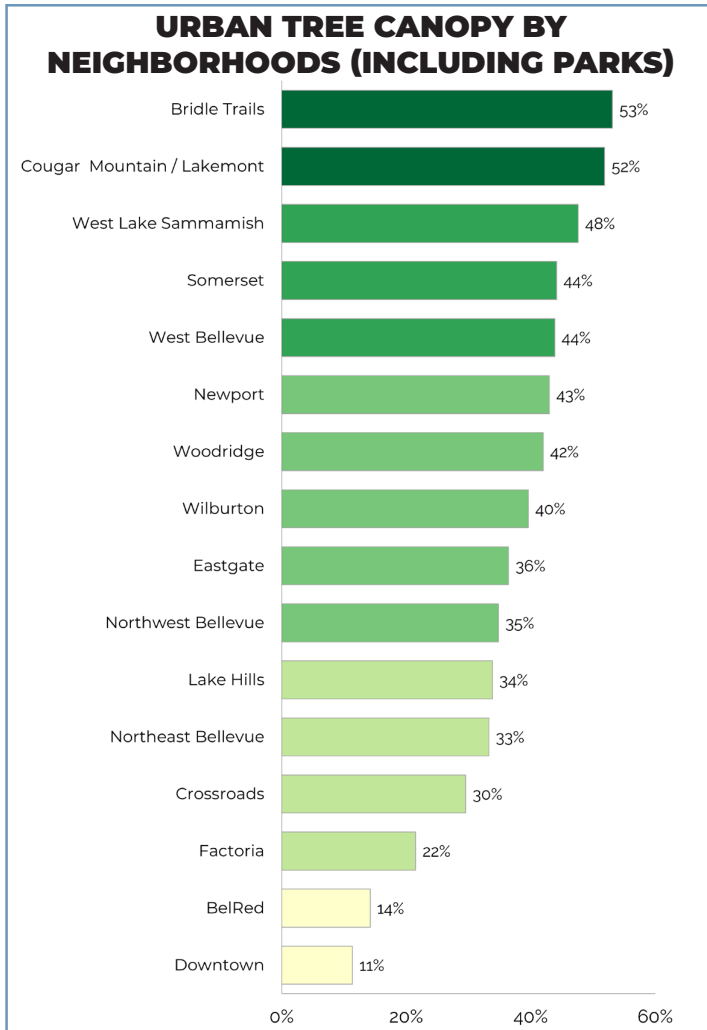
Figure 12. | Urban tree canopy in Bellevue by designated land use in 2021. * Designated Land Use acreage includes the Urban Growth Area in Cougar Mountain, which is outside of City limits, but included in the Comprehensive Plan, along with a portion of Newcastle Park, which the City owns and maintains.

URBAN TREE CANOPY BY NEIGHBORHOODS

Urban tree canopy metrics were also assessed at the neighborhood level. This 2021 analysis revealed that Bellevue has a great deal of variation in UTC throughout the City. While some neighborhoods such as Bridle Trails and Cougar Mountain/Lakemont had around 50% canopy cover, others such as BelRed and Factoria had less than half that. Neighborhood parks, greenbelts, and open spaces are included in these canopy metrics. Consequently, some neighborhoods may have inflated tree canopy measurements due to the presence of these designated greenspaces.

Bridle Trails had the highest canopy cover at 53%. This neighborhood was the second largest contribution of citywide canopy at 13% of the total. Cougar Mountain / Lakemont had slightly more canopy acres, contributing 14% of the citywide canopy cover. Lake Hills was one of the largest neighborhoods (containing 11% of the City's land area) but only contained 9% of the City's canopy cover. Fortunately, this neighborhood has the most room for new trees, with 555 acres, or 13% of the City's total PPA.

A majority of the neighborhoods remained relatively close to the citywide average of 20% PPA. Downtown had the least amount of tree canopy cover (just 11%) and also the lowest amount of PPA, with only 7%. The Downtown neighborhood would greatly benefit from tree planting since 80% of its land is covered with impervious surfaces. Similarly, Lake Hills had almost 900 acres of impervious surfaces. Introducing more trees to these areas of high impervious neighborhoods would improve aesthetics of the City, attract more shoppers and tourists to local businesses, and improve walk-ability throughout these residential areas.



Lake Hills

- 2nd largest neighborhood
- Lots of impervious
- Lots of plantable space
- Low canopy cover



Figure 13. | Urban tree canopy by neighborhoods including park lands.

URBAN TREE CANOPY CHANGE BY NEIGHBORHOODS

Subdividing the results by neighborhoods, it became evident that the bulk of canopy loss was concentrated in four neighborhoods. Over the course of a decade, Wilburton had the sharpest canopy decline of 2%, equivalent to a loss of 18 acres. Conversely, the Bridle Trails neighborhood gained the most canopy area, approximately 123 acres or 6% canopy increase over the same period. Although the Downtown neighborhood had the lowest canopy cover in 2021, it consistently gained canopy throughout the assessment, making a commendable 4% canopy increase in ten years.

Between 2019 and 2021, both Eastgate and Northeast Bellevue lost about 20 acres of canopy. During this time Lake Hills also saw a decline of about 35 acres. Fortunately, all three of these neighborhoods did experience an overall net increase from 2011 to 2021. Nevertheless, given their recent reductions in canopy, it would be prudent to monitor canopy in these neighborhoods.



-2%

The largest reduction of canopy occurred in Wilburton

Table 3. | Urban tree canopy change by neighborhoods.

Neighborhood	Land Distribution		UTC in 2021		UTC Change (2019-2021)		UTC Change (2011-2021)	
	Acres	%	Acres	%	Acres	%	Acres	%
BelRed	962	4%	137	14.2%	3	0%	-2	0%
Bridle Trails	2,027	9%	1,077	53.1%	39	2%	123	6%
Cougar Mountain / Lakemont	2,369	11%	1,229	51.9%	-1	0%	75	3%
Crossroads	815	4%	241	29.6%	-10	-1%	21	3%
Downtown	433	2%	49	11.4%	12	3%	17	4%
Eastgate	1,767	8%	644	36.5%	-24	-1%	42	2%
Factoria	389	2%	84	21.5%	6	1%	13	3%
Lake Hills	2,261	11%	765	33.9%	-35	-2%	59	3%
Newport	1,719	8%	739	43.0%	14	1%	-1	0%
Northeast Bellevue	1,415	7%	471	33.3%	-18	-1%	39	3%
Northwest Bellevue	1,327	6%	462	34.8%	2	0%	17	1%
Somerset	1,313	6%	580	44.2%	-5	0%	17	1%
West Bellevue	1,677	8%	736	43.9%	41	2%	-2	0%
West Lake Sammamish	1,126	5%	536	47.6%	-7	-1%	37	3%
Wilburton	1,113	5%	441	39.6%	10	1%	-18	-2%
Woodridge	731	3%	307	42.0%	13	2%	14	2%
Totals	21,444	100%	8,500	39.6%	+40	+0%	+451	+2%

URBAN TREE CANOPY BY NEIGHBORHOODS (EXCLUDING PARKS)

Bellevue is fortunate to have an extensive parks system that includes some heavily forested areas. As part of the canopy cover analysis, parks were removed from the neighborhood areas in an effort to demonstrate canopy growth (or decline) without the influence of these densely wooded regions. Bellevue contains almost 100 parks, totaling 2,514 acres of land set aside for open space, preservation and recreation. Combined, these areas contain 1,880 acres of canopy. The results show that with parks removed, the average canopy cover among neighborhoods drops from 40% to 35%. Even though the parks contain ample plantable space, it was not enough to alter the average PPA percentage across the neighborhoods.

Table 4. | Urban tree canopy change by neighborhoods minus park lands.

Neighborhood Areas Minus Bellevue Parks	2011 % UTC	2021 % UTC	Change from 2019 to 2021	Change from 2011 to 2021
BelRed	14.3%	14.0%	0.4%	-0.3%
Bridle Trails	47.6%	54.0%	2.3%	6.4%
Cougar Mountain / Lakemont	39.3%	42.4%	-0.3%	3.1%
Crossroads	26.8%	29.2%	-1.2%	2.4%
Downtown	6.4%	10.7%	3.0%	4.3%
Eastgate	33.6%	35.9%	-1.4%	2.3%
Factoria	18.1%	21.5%	1.4%	3.4%
Lake Hills	28.6%	30.6%	-1.9%	2.1%
Newport	36.0%	36.2%	0.5%	0.2%
Northeast Bellevue	27.6%	30.3%	-1.4%	2.7%
Northwest Bellevue	33.0%	34.4%	0.2%	1.4%
Somerset	32.2%	33.7%	-0.5%	1.5%
West Bellevue	37.4%	38.1%	0.3%	0.7%
West Lake Sammamish	38.6%	41.9%	-1.2%	3.3%
Wilburton	30.2%	29.9%	0.6%	-0.3%
Woodridge	33.9%	36.3%	1.5%	2.3%
Totals	32.9%	35.2%	-0.1%	2.3%

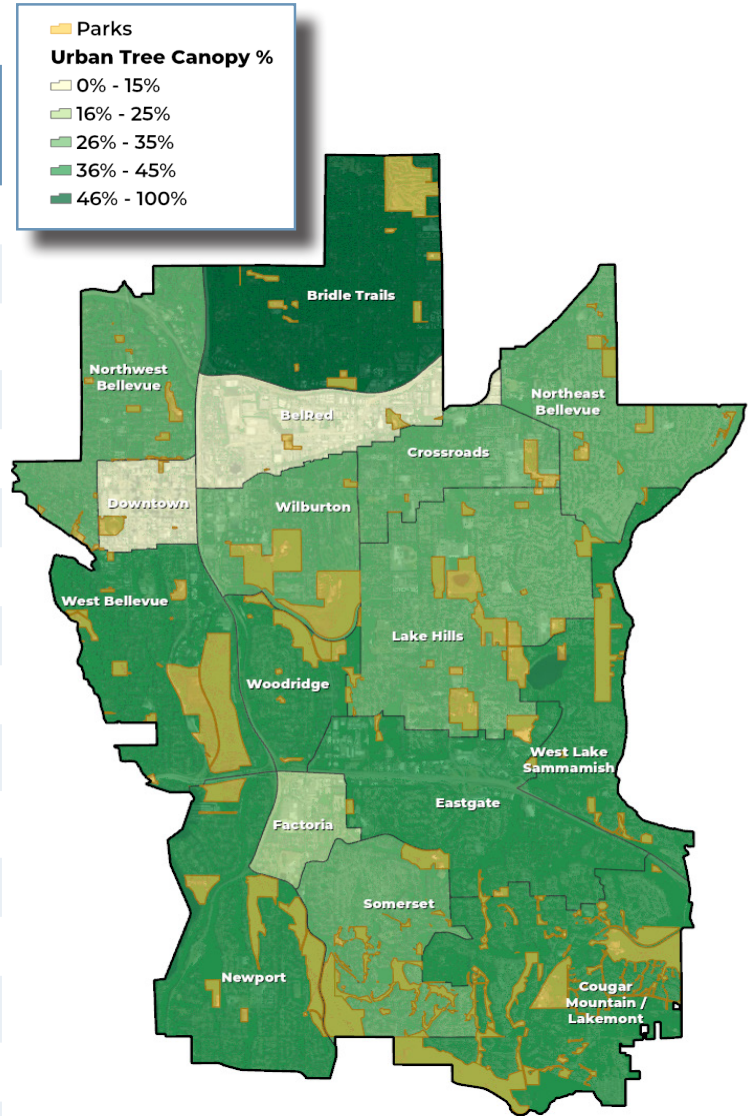


Figure 14. | Bellevue's neighborhoods excluding parks.

URBAN TREE CANOPY CHANGE BY NEIGHBORHOODS (EXCLUDING PARKS)

Looking solely at Bellevue's parks, those features collectively gained 20 canopy acres throughout the 10-year study period. On the other hand, with parks removed, neighborhoods had a net gain of 391 acres (or a consistent 2% increase) in canopy. Interestingly, the results show that tree canopy in Bellevue's neighborhoods actually had a slightly higher rate of canopy gain without the parks included (2.1% UTC change without the parks as opposed to 1.9% UTC change with the parks). In conclusion, while the parks do significantly contribute to the citywide canopy, the neighborhoods themselves are independently forested as well.

URBAN TREE CANOPY BY STREAM CORRIDORS

Stream corridors help maintain and promote a healthy natural environment in Bellevue by providing long-term protection of streams, enhanced wildlife habitat, as well as improved water quality. These corridors represent areas within 100 feet of a stream, on both sides of the stream.

These floodplains covered about 11% of the City's land area and contained 18% of the City's tree canopy cover. In 2021, Bellevue's stream corridors had an average of 66% tree canopy coverage, nearly 30% higher than the citywide average. The stream corridors studied contained 374 acres of possible planting area, or 9% of the City's total available space.

There are 385 acres (17%) of impervious surfaces within this riparian corridor. Trees planted near these impervious surfaces can aid in mitigating storm-water runoff that may otherwise carry unhealthy pollutants (such as nitrogen, phosphorous, and suspended sediment) into surface water bodies. Additionally, trees planted in these areas will provide shade for water bodies and in turn, reduce water temperatures to protect the aquatic ecosystem of endemic fish and reptile species. The Shoreline Management Act was created to empower Washington municipalities to restore and expand natural buffers in an effort to protect the state's 28,000 miles of marine shorelines. To fully comply with recommendations associated with this legislation, Bellevue should seek to increase canopy cover to near 100% to protect its natural resources for future generations.



URBAN TREE CANOPY CHANGE BY STREAM CORRIDORS

From 2011 to 2019, there was a slight decrease in tree canopy cover (-0.1%) in Bellevue's stream corridors. However between 2019 and 2021, 20 acres of canopy were gained in these areas. So during the entire ten year study period (2011 to 2021), the stream corridors experienced an overall increase in tree canopy. In total, there was a 1% net increase, or a gain of 19 acres. By 2021, 66% of these areas were covered with canopy, up from 65% in 2011.

These corridors provide a variety of important ecosystem services so it is important to preserve and protect the existing tree canopy in these areas.



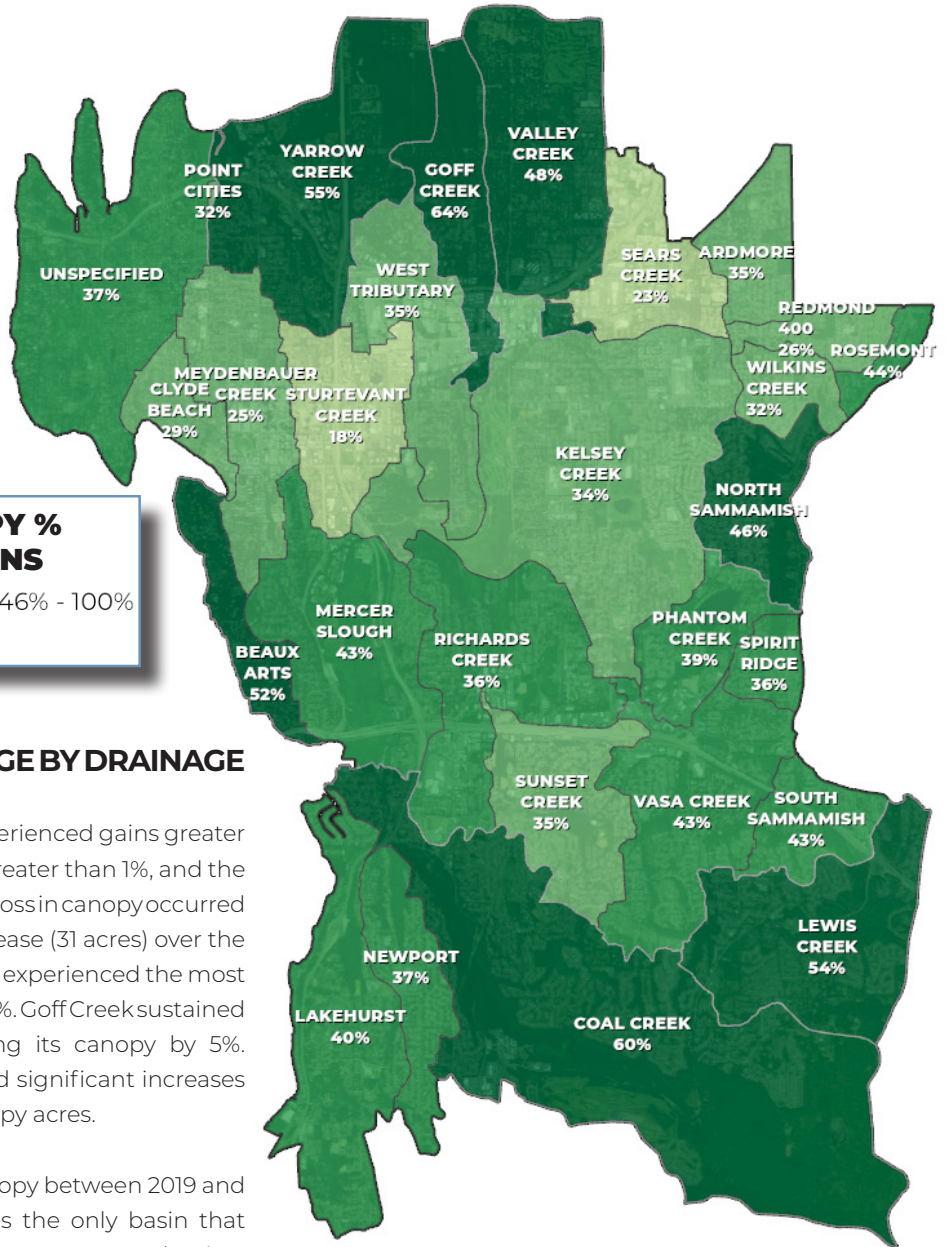
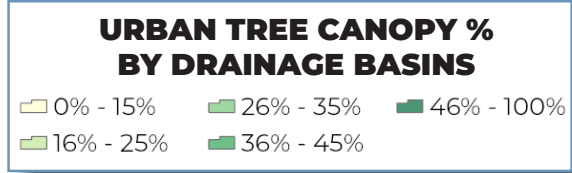
Figure 15. | Urban tree canopy in Bellevue's stream corridors.

URBAN TREE CANOPY BY DRAINAGE BASINS

Because of their benefits for regulating runoff, reducing flooding, and maintaining a healthy water cycle, urban tree canopy metrics were also assessed across the surrounding drainage basins. This assessment boundary extended beyond the City boundary to include additional areas that drain into Bellevue's City limits (see Figure 16). Generally, the basins near the northern and southern boundaries of the City contained the highest canopy cover. The basins with the lowest canopy cover were generally concentrated at the northern part of the City as well.

Within the various drainage basins, there was significant variation in both UTC and PPA. UTC ranged from to 64% in Goff Creek to only 18% in Sturtevant Creek. Coal Creek was the largest basin, representing 14% of the total study land area, and unsurprisingly represented 20% of the citywide canopy with its 2,401 acres of canopy. This basin also had an extremely high canopy cover within its boundaries at 60%. The only basin with a higher percentage of canopy cover was Goff Creek.

PPA ranged from 11% in Goff Creek to 29% in the Redmond 400 basin. Coal Creek and Kelsey Creek offered the greatest opportunities for expanding the City's canopy, containing 13% and 12% of the City's total PPA respectively. Lakehurst and Mercer Slough are also prime targets for tree planting opportunities with about 300 acres of plantable space each.



URBAN TREE CANOPY CHANGE BY DRAINAGE BASINS

Of the City's 28 drainage basins, 18 experienced gains greater than 1%, only one experienced a loss greater than 1%, and the other 9 remained relatively stable. That loss in canopy occurred in the Lakehurst basin, with a 2% decrease (31 acres) over the ten-year period. The Valley Creek basin experienced the most significant canopy gain of 84 acres, or 6%. Goff Creek sustained substantial canopy growth, increasing its canopy by 5%. Similarly, Lewis Creek also experienced significant increases in canopy, with the addition of 51 canopy acres.

Unfortunately, 16 of the basins lost canopy between 2019 and 2021. However, Lakehurst emerged as the only basin that persisted to lose canopy throughout the ten-year evaluation. This sustained decline merits vigilant monitoring to ensure that the basin's downward trajectory of canopy is corrected.

Figure 16. | Urban tree canopy in Bellevue and surrounding areas by drainage basin in 2021.

URBAN TREE CANOPY BY SCHOOLS

UTC was assessed for all 81 public and private school properties in Bellevue to determine how well the numerous benefits of the City's urban forest are reaching its next generation of residents. Exposure to green spaces has been shown to increase attention and concentration, and improve overall mental well-being in children.

Educational institutions within Bellevue collectively occupy 825 acres, constituting roughly 4% of the City's land expanse. Combined, the schools encompass a total of 220 canopy acres. With a canopy coverage of 27%, this falls notably below the citywide average of 40%. However, leveraging all 147 acres of PPA on school yards could raise the average canopy cover up to 45%.

Table 5. | Urban tree canopy by Bellevue's schools.

Schools	UTC Acres	UTC %	Schools	UTC Acres	UTC %	Schools	UTC Acres	UTC %
America's Child	0.1	19%	Eastgate	2.5	31%	Northwest University	0.4	35%
Ardmore	3.1	30%	Eastside Academics	3.7	40%	Odle	2.9	15%
Asia Pacific	0.3	23%	Eastside Academy	3.8	38%	Open Window	1.7	22%
Bellevue College (Main Campus) - Landerholm	33.9	35%	Eastside Montessori	0.8	25%	Overlake Specialty	0.4	38%
Bellevue College (Main Campus) - 145th Ave	0.2	41%	Eastside Preparatory School	0.0	0%	Phantom Lake	1.6	16%
Bellevue College (North Campus) - 29th Place	0.4	23%	Educational Service Center (East)	1.0	40%	Puesta Del Sol	4.7	35%
Bellevue College (Main Campus) - 145th Ave	0.3	40%	Educational Service Center (West)	1.1	42%	Ringdall	4.5	24%
Bellevue	13.0	33%	Emerald Heights	4.1	77%	Risdon	5.4	31%
Bellevue Big Picture	1.6	12%	Enatai	2.3	27%	Sacred Heart	2.6	28%
Bellevue Children's Academy (Lower Campus)	0.3	19%	Eton	0.7	52%	Sammamish	4.1	11%
Bellevue Children's Academy (Upper Campus)	0.3	11%	Forest Ridge	6.5	39%	Sarodgini Children's Academy	0.4	37%
Bellevue Christian School (Three Points Campus)	2.5	30%	French Immersion School	0.5	30%	Seattle Voctech	0.0	0%
Bellevue Christian School (Clyde Hill Campus)	0.9	10%	GIX	0.1	3%	Sherwood Forest	1.0	11%
Bellevue Management Support Ctr	1.2	19%	Hazelwood	5.1	36%	Somerset	4.2	41%
Bellevue Montessori School (Main Campus)	0.9	61%	Highland	3.7	18%	Spiritridge	3.1	34%
Bellevue Montessori School (Park Elementary Campus)	0.1	35%	Hillside	3.4	94%	St Louise	1.5	16%
Bellevue Montessori School (Rossano Campus)	0.2	24%	Interlake	10.2	26%	St Madeleine	3.0	29%
Bellewood	2.5	25%	International	5.8	30%	St Thomas	0.6	10%
Bel-Red Bilingual	0.2	44%	International Montessori	0.3	34%	Stevenson	1.0	10%
Bennett	2.2	23%	Jewish Day	0.9	15%	Sunset	3.9	28%
Cedar Crest	0.5	31%	Jing Mei	3.4	34%	Tillicum	2.1	12%
Cedar Park Christian	0.3	9%	Lake Hills	0.8	10%	Tyee	4.8	21%
Cherry Crest	6.8	67%	Little School	7.4	76%	Undeveloped	1.1	53%
Chestnut Hill	0.8	26%	Living Montessori	3.7	40%	Undeveloped	3.0	36%
Chinook	2.6	15%	Medina	0.9	15%	Wilburton	2.2	24%
Clyde Hill	1.4	20%	Newport	4.7	12%	Wilburton Instructional Service Ctr	0.5	8%
Cougar Ridge	2.9	29%	Newport Heights	2.4	26%	Woodridge	1.2	12%

Overall in 2021, canopy cover varied dramatically, ranging from a near 0% at Seattle Voctech School to 94% at the Hillside Student Community School. Interestingly, primary education (K-5 schools) boasted the highest average canopy cover. However, it is important to highlight that this grade level category had the highest number of schools compared to other grade level types.

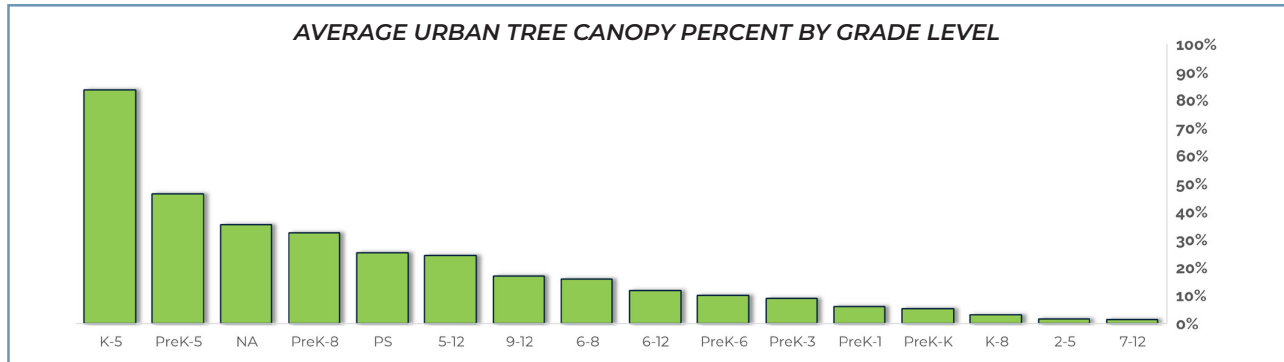


Figure 17. | Average urban tree canopy percent by school grade level.

The average PPA of 1.8 acres on school property reveals that while school properties are in need of additional tree canopy, there is minimal available space to plant trees. Bellevue College (Main Campus) - Landerholm offers the greatest opportunity, offering 15 acres of PPA. Similarly to UTC, when assessing grade level, K-5 schools had the highest average percentage of plantable space.

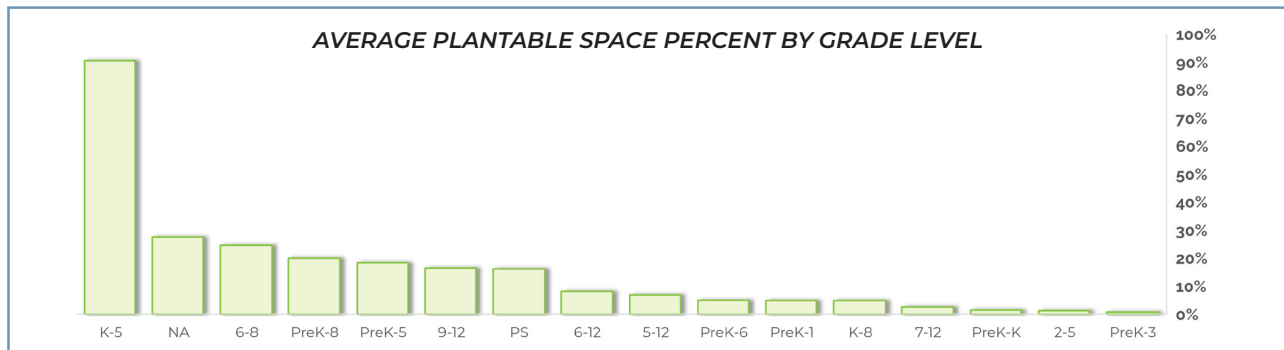


Figure 18. | Average plantable space percent by school grade level.

URBAN TREE CANOPY CHANGE BY SCHOOLS

Bellevue’s 81 school properties experienced a total net gain of 17 acres of tree canopy, or a 2.1% increase in canopy across the combined school areas. Wilburton Elementary School, which was built in 2017-2018, experienced the greatest reduction in canopy, losing four of its seven acres from 2011-2021 (equating to a 51% loss). Bellevue College’s Main Campus (on Landerholm Circle SE) is the largest school property in Bellevue, and that campus experienced the largest increase of canopy acreage from 29 acres in 2011 to 34 acres in 2021 (a gain of 5%). A majority of school properties (58 schools, or 72%) experienced increases in canopy cover over the ten year period. Targeting those 20 schools that lost canopy for tree planting events can serve as community-building activities, fostering collaboration among students, teachers, parents, and local organizations.

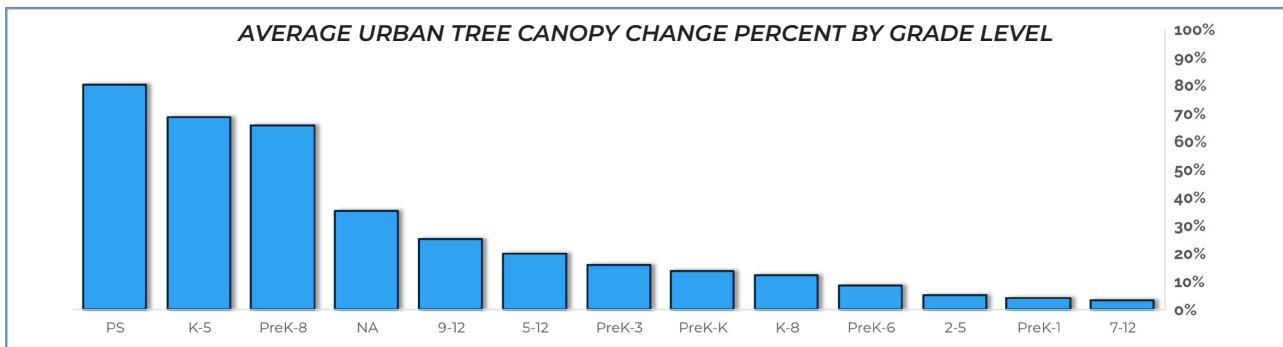


Figure 19. | Average tree canopy change percent by school grade level.

URBAN TREE CANOPY BY CENSUS BLOCK GROUPS

Urban tree canopy and possible planting areas were assessed at the census block group level. These boundaries are reviewed and updated at the start of every decade. The boundaries analyzed in this assessment were modified by the U.S. Census Bureau in 2020. This was the smallest geographic area unit analyzed in this assessment and is particularly valuable for assessing the equitable distribution of tree canopy throughout the City as the block groups are linked to all demographic and socioeconomic U.S. census data.

Results indicated that urban tree canopy varies substantially throughout the City, with one census block group containing only 6% cover and another containing as much as 90%. The areas of low canopy cover were generally concentrated in the northeastern portion of the City near the Northwest Bellevue and the Bel-Red neighborhoods. Areas of high canopy cover were seen along the edges of the City's perimeter, particularly in the vicinity of Coal Creek, Lakemont and West Lake Sammamish.

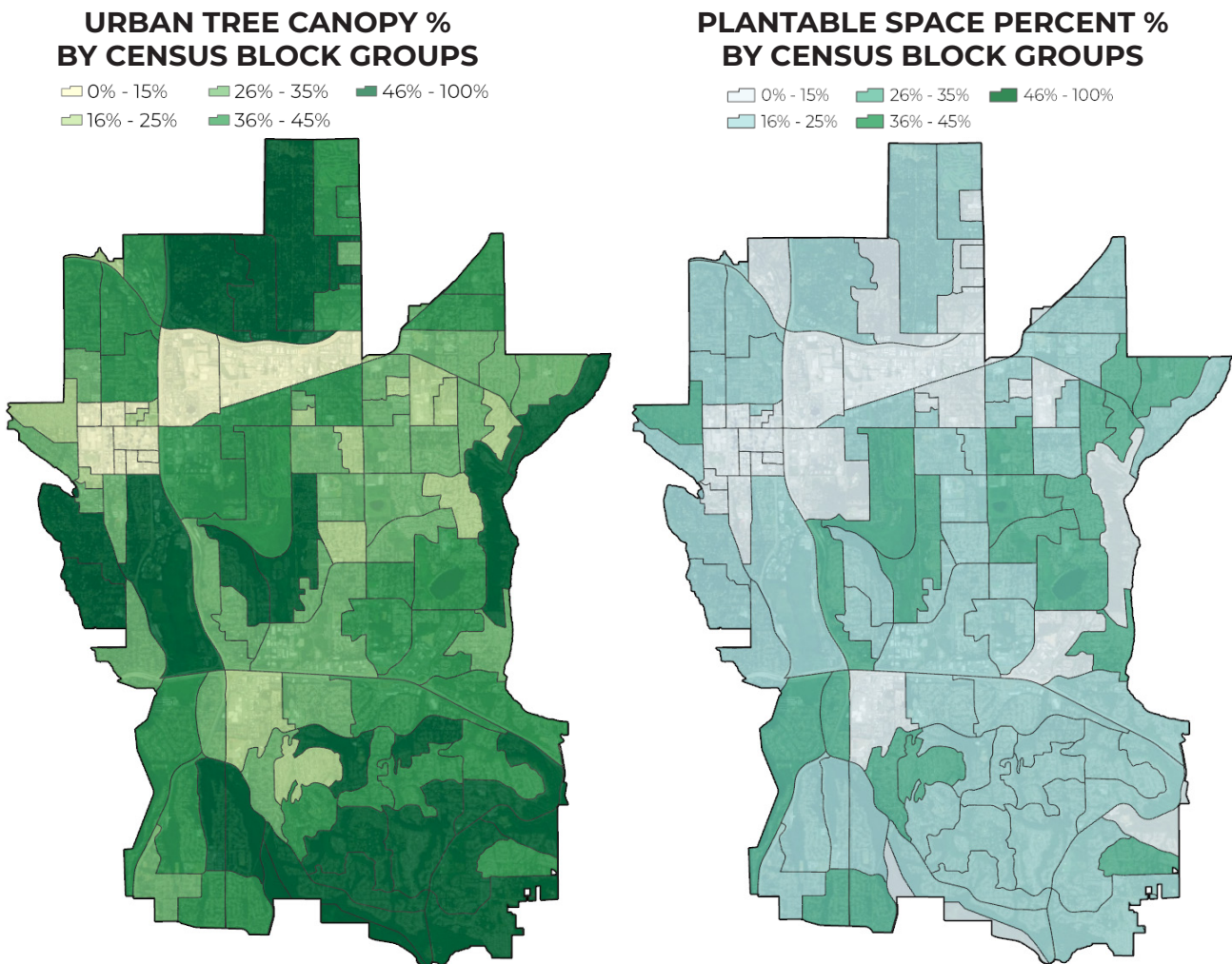


Figure 20. | Urban tree canopy percent (left) and plantable space percent (right) by census block groups.

PPA also varied somewhat across the block groups, with one containing only 2% PPA and another as much as 34% PPA. Unfortunately some of the areas of low UTC are also areas of low PPA, as seen in the more industrial neighborhoods in the northern portion of the City.

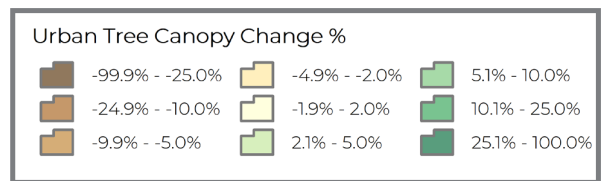
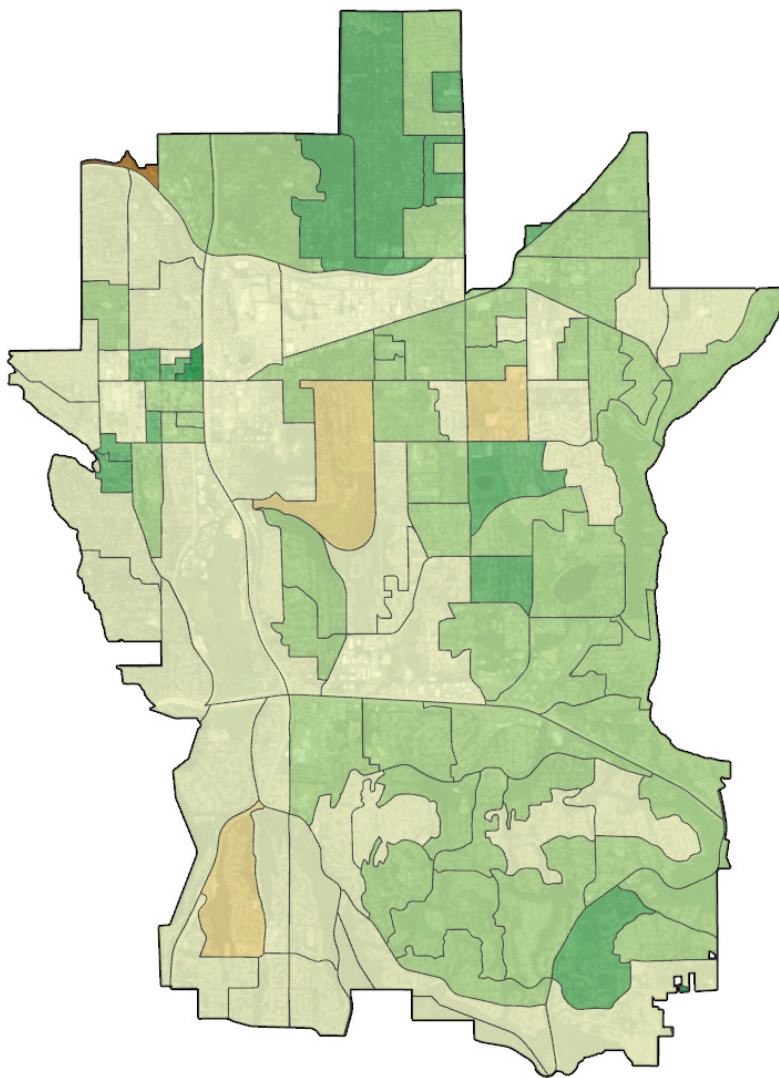
For the census blocks adjacent to I-405, I-90, and SR520, additional tree planting in the vicinity of the freeways can help improve air quality, reduce noise, and improve the experience for pedestrians in these areas.

URBAN TREE CANOPY CHANGE BY CENSUS BLOCK GROUPS

The most fine-grained unit of analysis for this assessment was the change in canopy across census block groups. As the smallest geographic unit covering the entire City, this assessment revealed changes in canopy at the finest scale. Some block groups lost as much as 5% of their canopy while others gained up to 18%. Losses in canopy tended to be concentrated near the center of the City and along the I-405 corridor. The most significant loss within one block group was a loss of 18 acres in the block group that contained the Glendale County Club. Generally, block groups in the northern part of the City experienced more canopy increases. The largest increase occurred in the block group containing Bridle Trails State Park with a gain of 51 canopy acres.

A deeper understanding of canopy trends may be gleaned from evaluating canopy change in more recent years. For instance, the largest block group, containing Mercer Slough, experienced the largest reduction in canopy, losing 68 acres of canopy between 2011 and 2019. Yet, this same area also had the largest increase in canopy with 52 acres from 2019 to 2021. So over the entire 10-year assessment period, the block group had a net loss of just 15 acres.

UTC CHANGES 2011-2021



UTC CHANGES 2019-2021

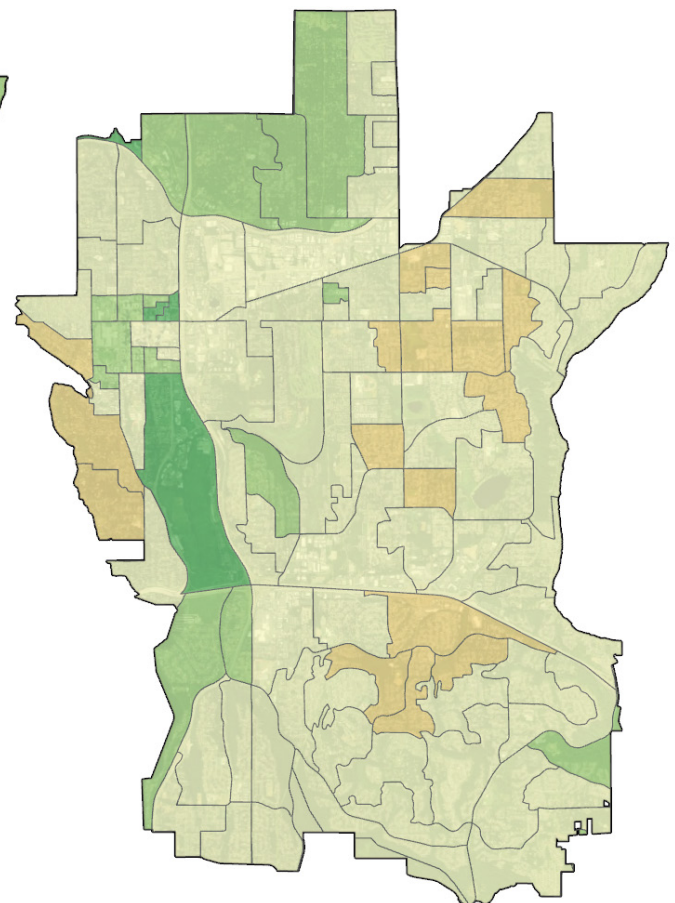


Figure 21. | Urban tree canopy change by census block groups. Canopy change from 2011 to 2021 on the left and changes from 2019 to 2021 on the right.

URBAN TREE CANOPY BY RIGHT-OF-WAY BY CENSUS BLOCK GROUPS

In addition to being assessed throughout each census block group's entire area, UTC was also assessed for the right-of-way (ROW) areas within each census block group. Right-of-way areas include the City's sidewalks, roadways, and medians that are publicly owned and maintained. This metric is helpful for quantifying the City's street tree resources, as trees in this area provide an especially valuable service in terms of air pollution control and shading, while still tying it to a small and significant unit of measure (census block groups).

The ROW occupies 3,867 acres of land, approximately 18% of Bellevue's land area. On average, Bellevue's rights-of-way had a UTC of 24% in 2021. This figure fell well below the citywide average of 40%. Additionally, 63% of the ROW surface was classified as impervious and therefore unsuitable for tree planting without major land modification. However, there are 510 acres of plantable space, or 13% of the right-of-way is composed of open vegetation available for new trees.



Figure 22. | Urban tree canopy in the right-of-way.

URBAN TREE CANOPY CHANGE BY RIGHT-OF-WAY BY CENSUS BLOCK GROUPS

Changes in canopy cover within the rights-of-way of each census block group were assessed to gain insight on street trees citywide. Throughout the entire 10-year study period these areas had an overall increase of 3% which was greater than the citywide average of 2%. In more recent years, street trees gained 26 acres or saw an increase of 1% from 2019 to 2021. Changes across census block groups varied with the greatest decrease at -14% and the greatest increase at 19%.

ASSESSMENT OF ECOSYSTEM BENEFITS

Using the best available science from i-Tree tools, values were calculated for some of the benefits and functions provided by the urban tree canopy in Bellevue, Washington. The urban forest holds millions of dollars of savings in avoided infrastructure costs, pollution reduction, and stored carbon. The following values were calculated using the USDA Forest Service’s i-Tree Landscape tool with the City of Bellevue’s total acres of urban tree canopy as the input data.

AIR QUALITY

Trees produce oxygen, indirectly reduce pollution by lowering air temperature, and improve public health by reducing air pollutants which cause death and illness. The existing tree canopy in Bellevue removes approximately 520,300 pounds of air pollution annually, valued at over \$2,589,762.

BENEFIT	UNITS	VALUE
Pollution Removed	520,284 tons/yr	\$2,589,763
Runoff Avoided	700 M gal/yr	\$6,259,703
CO2 Sequestered	7,172 tons/yr	\$1,223,204
ANNUAL VALUE PROVIDED		\$10,072,669
CO2 Stored	362,446 tons	\$61,815,465

STORM-WATER AND WATER QUALITY

Trees and forests mitigate storm-water runoff which minimizes flood risk, stabilizes soil, reduces sedimentation in streams and riparian land, and absorbs pollutants, thus improving water quality and habitats. The tree canopy in Bellevue absorbs over 700 million gallons of water per year. Extrapolated citywide, this means that the City of Bellevue’s existing canopy provides over \$6,259,702 annually in storm-water benefits.

CARBON STORAGE AND SEQUESTRATION

Trees accumulate carbon in their biomass; with most species in a forest, the rate and amount increase with age. The trees of Bellevue store approximately 362,450 tons of carbon, valued at over \$61.8 million (or \$170 per ton), and each year the tree canopy absorbs and sequesters approximately 14.3 million pounds of carbon dioxide, valued at over \$1.2 million.

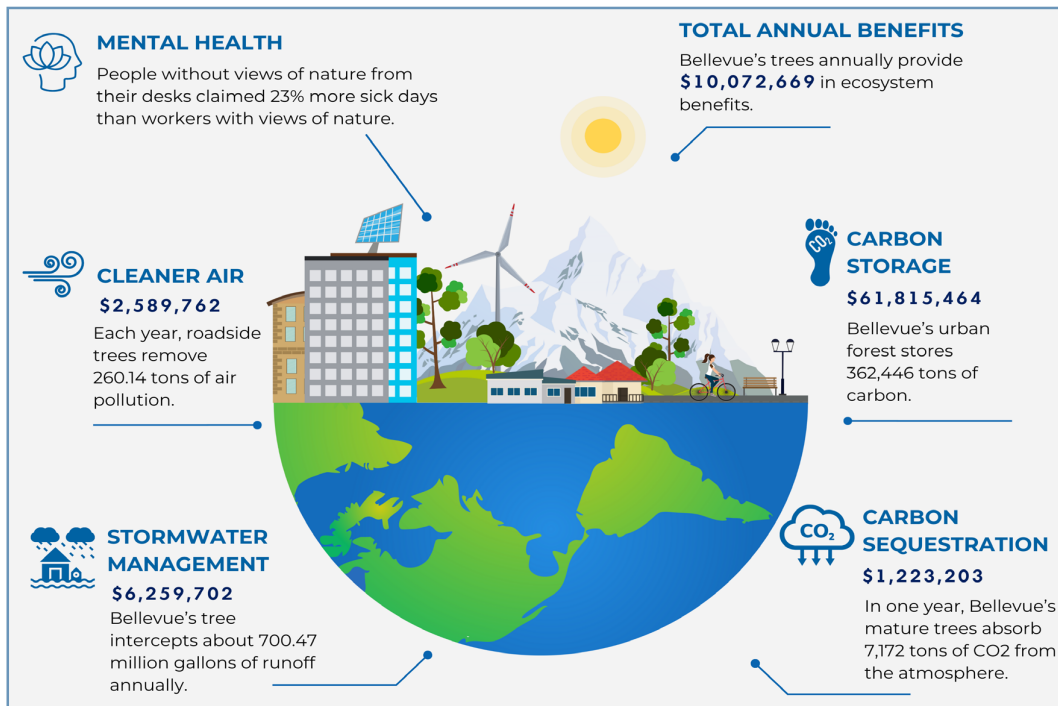


Figure 23. | Eco-benefits of Bellevue’s urban forest derived from I-Tree. Additional data sourced from the [Arbor Day Foundation](#) and the [EPA](#).

CONCLUSIONS AND

RECOMMENDATIONS

SUMMARY OF KEY FINDINGS

Overall, the City of Bellevue and the surrounding areas within Bellevue's drainage basins have very large resource of Urban Tree Canopy and Plantable Spaces. Along with this resources comes the responsibility to protect and preserve these green infrastructure, especially in light of the current rapid pace of urbanization, development, and overall growth. The key findings in the figure below represent a selection of actionable findings that this analysis uncovered. Page numbers are included for quick reference to the most important information.

... PAGE 9 ...

Tree canopy within the City boundary increased by 2% in ten-years.

... PAGE 10 ...

Suburban residential areas contributed the greatest amounts of both UTC and PPA towards the citywide totals, making up 64% of the City's UTC and 77% of all PPA in Bellevue.

... PAGE 12 ...

Lake Hills was one of the largest neighborhoods (containing 11% of the City's land area) but only contained 9% of the City's canopy cover. However, this neighborhood has the most room for new trees, with 555 acres, or 13% of the City's total PPA.

... PAGE 13 ...

Canopy loss was concentrated in four neighborhoods. Over the course of a decade, Wilburton had the sharpest canopy decline of 2%, equivalent to a loss of 18 acres.

... PAGE 15 ...

In 2021, Bellevue's stream corridors had an average of 66% tree canopy coverage. This is nearly 30% higher than the citywide average.

... PAGE 17 ...

Educational institutions within Bellevue collectively have an average canopy cover of 27%. However, leveraging all 147 acres of PPA on school yards could raise the average canopy cover up to 45%.

... PAGE 19 ...

For the census blocks adjacent to I-405, I-90, and SR520, additional tree planting in the vicinity of the freeways can help improve air quality, reduce noise, and improve the experience for pedestrians in these areas.

... PAGE 21 ...

Bellevue's ROW contains 501 acres of plantable space.

RECOMMENDATIONS

1. Leverage the results of this assessment to promote the urban forest and monitor trends

The results of this assessment should be used to encourage investment in urban forest monitoring, maintenance, and management; to prepare supportive information for local budget requests/grant applications; and to develop targeted presentations for City leaders, planners, engineers, resource managers, and the public on the functional benefits of trees in addressing environmental issues. The land cover, tree canopy, and plantable space data should be disseminated to diverse partners for urban forestry and other applications while the data are current and most useful for decision-making and implementation planning. The information from this study can help establish new canopy cover goals for the short- and long-term to continue to expand City of Bellevue's urban forest to its known potential. Recurring assessments of the City's tree canopy represent important steps in ensuring the long-term health of its urban forest. Refining management strategies and revisiting strategic documentation can empower the City and its stakeholders to not only evaluate its progress towards current objectives, but also formulate new ones as well.

In 2021, Bellevue's 39.6% tree canopy fell just short of the City's comprehensive plan goal of 40% tree canopy. In the 2007 study, American Forests provided the following recommendations for tree canopy in different land use types:

Table 6. | Urban tree canopy cover of each land use type compared to American Forests' 2007 recommended goals.

Land Use Types	Suggested UTC Goal %*	Current UTC %
Urban Residential	35%	33%
Suburban Residential	50%	39%
Central Business District	15%	11%
Commercial & Mixed Use	25%	22%
Industrial	25%	28%
Parks	75%	75%
Right-of-way	25%	23%

**In the American Forest's 2007 Tree Canopy Assessment, the report recommended tree canopy goals by land use type as a best practice. Further analysis of these goals is needed to determine relevance for Bellevue in terms of community character, feasibility, and desirability, especially for the suburban residential goal.*

2. Use the urban tree canopy data to identify areas to prioritize canopy expansion

The City and its various stakeholders can utilize the results of the UTC and PPA analyses to identify the best locations on City-owned and private property to focus future tree planting and canopy expansion efforts. Trees can play a large role in improving public health by improving air quality, reducing temperatures, and addressing climate change. The City can acquire parcels for public use as part of redeveloped neighborhoods to be used as carbon sinks to address community access to nature, climate, human health, and equity. This assessment should be used to identify areas with the greatest need for canopy expansion. In addition to low canopy coverage, other socio-economic factors and environmental justice considerations can be used to identify areas for protecting and expanding the tree canopy in residential areas.

Additionally, the right-of-way often contains high concentrations of impervious surfaces. Utilizing the 501 acres of plantable space in the right-of-way could provide significant shading for walkways and roadways. The City can develop a proactive street tree maintenance program to take on the responsibility of planting and managing street trees, ensuring healthy trees are distributed equitably across the City. The City should evaluate City codes to increase tree preservation, protect existing trees during the development process, and set aside space for new larger stature trees to be planted within the public right-of-way to maximize the benefits of trees. Adopting ordinances and policies that reflect a "complete green streets" design methodology can help harmonize gray and green infrastructure, simultaneously maximizing public functionality and environmental benefit, while reducing associated costs.

3. Develop outreach programs towards private landowners

Suburban Residential and Urban Residential accounted for 71% of City's total tree canopy and contained 82% of all Citywide PPA. The City should focus on community outreach and education programs to better inform residents and private landholders of the environmental, health, social, and financial benefits that trees provide and consider other strategies to help preserve existing trees and grow the tree canopy in the 3,525 acres of plantable space on these residential zoned lands. The City's new urban forestry programs such as the annual Trees for Bellevue Tree Giveaway, the Tree Ambassador program, and Tree Tours all help to increase knowledge of the value and benefits of trees and encourage tree planting and preservation. The City should explore options to develop grant programs for tree maintenance or removal of hazard or invasive trees within the City to remove barriers for overburdened communities which lack tree canopy. Tree planting programs, and tree maintenance events can help to promote proper pruning techniques for maintaining healthy, resilient trees. The City should also continue to develop partnerships with Community Based Organizations and individual champions throughout neighborhoods to build stewardship at the community level. In addition, the City should continue to conduct volunteer tree planting and tree maintenance events to increase awareness levels in the community.

4. Use TreePlotter to identify areas in need of tree canopy, prioritize planting efforts, and continue to monitor the urban forest

Performing a canopy assessment every five years is recommended. The City's current subscription to TreePlotter Canopy will guarantee updated assessments occur once than every 2-3 years. To maximize impact, see greater return on investment, and provide the greatest number of benefits to the community, we recommend that the City focus planting and management efforts in areas with high weighted priority rankings. Planting priority maps and data, displayed in TreePlotter™ CANOPY, show land cover metrics and the areas of highest priority collectively and individually for all planting prioritization criteria. Additionally, TreePlotter can be used to create unique weighted scenarios to focus efforts in targeted areas that meet specific criteria.



For instance, the City could find areas that have low UTC, high PPA, or would offer the greatest benefits to improving air quality and reducing summertime temperature. Focusing urban forest management resources on expanding and maintaining tree canopy in areas like these will have positive impacts on multiple factors that the City has deemed important. Efforts should focus on outreach to the residents of these neighborhoods, as well as local business and landowners, in order to promote new tree plantings and continued maintenance of existing trees. NAIP imagery was collected in 2021 in Washington and is collected by the USDA every two-three years. The City's CANOPY application can be updated with new UTC and PPA metrics when they become available in mid- to late-2024.



REPORT

APPENDIX

GLOSSARY/KEY TERMS

Land Acres: Total land area, in acres, of the assessment boundary (excludes water).

Non-Canopy Vegetation: Areas of grass and open space where tree canopy does not exist.

Possible Planting Area - Vegetation: Areas of grass and open space where tree canopy does not exist, and it is biophysically possible to plant trees.

Shrub: Areas of shrub or other leafy and woody vegetation (smaller than 6ft tall) that are not classified as tree canopy

Soil/Dry Vegetation: Areas of bare soil and/or dried, dead vegetation.

Total Acres: Total area, in acres, of the assessment boundary (includes water).

Unsuitable Impervious: Areas of impervious surfaces that are not suitable for tree planting. These include buildings and roads and all other types of impervious surfaces.

Unsuitable Planting Area: Areas where it is not feasible to plant trees. Airports, ball fields, golf courses, etc. were manually defined as unsuitable planting areas.

Unsuitable Soil: Areas of soil/dry vegetation considered unsuitable for tree planting. Irrigation and other modifiers may be required to keep a tree alive in these areas.

Unsuitable Vegetation: Areas of non-canopy vegetation that are not suitable for tree planting due to their land use.

Urban Tree Canopy (UTC): The “layer of leaves, branches and stems that cover the ground” (Raciti et al., 2006) when viewed from above; the metric used to quantify the extent, function, and value of the urban forest. Tree canopy was generally taller than 10-15 feet tall.

Water: Areas of open, surface water not including swimming pools.



DECEMBER | 2023

URBAN TREE CANOPY
ASSESSMENT
CITY OF BELLEVUE, WASHINGTON



APPENDIX P **Climate Vulnerability Assessment**



CITY OF BELLEVUE

Comprehensive Plan 2044

Climate Vulnerability Assessment



City of Bellevue

Community Development Department
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Environmental Science Associates

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October 2023



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SECTION 1 Summary and Introduction

The City of Bellevue conducted a Climate Vulnerability Assessment to identify potential impacts associated with climate change, vulnerabilities, and adaptive capacities for Bellevue’s people, built environment, and natural systems. Conducting this assessment was an action in the Sustainable Bellevue Environmental Stewardship Plan, and will help inform the Comprehensive Plan Periodic Update, other planning processes, and future capital projects. With this information, the City of Bellevue can consider adapting its policies and strategies to be more prepared and more resilient to climate impacts. Bellevue will likely experience the following changes over the next 50 years (University of Washington Climate Impacts Group [UW CIG] 2009; Roop et al. 2020), which will have impacts on human health and the built and natural environment:

- Increasing average annual air temperatures leading to:
 - More frequent and extreme heat events
 - More prolonged periods of drought, particularly during summers, in soil moisture and streambeds
 - Increasing stream temperatures
- Increasing extreme precipitation events, particularly during the winter, leading to:
 - Increased risk of runoff, erosion, and landslides or mudslides
 - Increased frequency and extent of flood events
- Increasing frequency, severity, and extent of regional wildfires leading to:
 - Increasing frequency and severity of poor air quality (local risk of wildfires is low, but wildfire smoke will be an issue as fires increase across the Pacific Northwest)

What is climate resilience?

The capacity of a community, business, or natural environment to prevent, withstand, respond to, and recover from a disruption (US Climate Resilience Toolkit 2021).

The vulnerability of a community or particular resource (e.g. sector, neighborhood) to climate change is determined by evaluating its exposure, sensitivity, and adaptive capacity. **Exposure** refers to the degree of climate change impacts that occur, while **sensitivity** is the degree to which a community or resource is

affected by some amount of exposure. Exposure and sensitivity combined provide an understanding of the potential impacts posed by climate change to a resource. **Adaptive capacity** refers to the degree to which a community or resource is able to cope with those potential impacts. When combined, these three factors—exposure, sensitivity, and adaptive capacity—create an overall picture of vulnerability (Figure 1). To reduce vulnerability, communities like Bellevue can engage in resilience planning. A plethora of resilience strategies are available for the City of Bellevue to explore integrating into its Comprehensive Plan and other projects and planning efforts. Although many of these strategies are already being implemented—such as tree planting, which helps to reduce urban heat islands while also improving air quality, providing stormwater management, and enhancing overall livability—many such programs will need to be expanded to address the climate vulnerabilities described in this report.

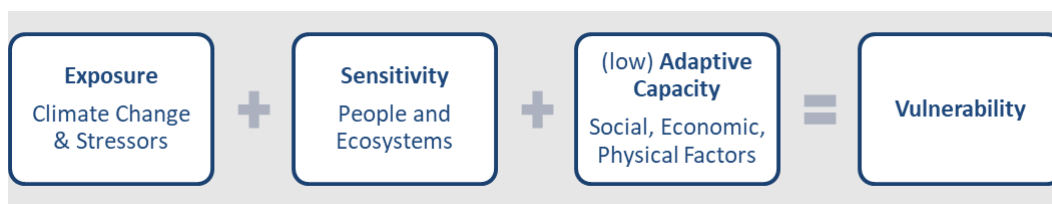


FIGURE 1 Elements of Climate Vulnerability

Climate impacts, vulnerabilities, and adaptive capacity are analyzed and organized by the following sectors:

- Buildings and Energy
- Cultural Resources
- Economic Development
- Ecosystems
- Emergency Management
- Human Health
- Land Use and Development
- Transportation
- Utilities (Solid Waste, Wastewater, and Stormwater)
- Water Resources

The purpose of this report is to summarize the vulnerabilities posed to people and resources in the city by climate change and identify potential resilience strategies for the City of Bellevue to consider in planning and projects. The report includes regional climate trend data and a climate vulnerability index, which is a spatial map incorporating data from 30 different indicators considering local information about exposure, sensitivity, and adaptive capacity in Bellevue. Environmental and land use planners, biologists, engineers, and other professionals on the project team considered climate science, social and economic conditions, land cover, infrastructure systems, programs and plans, and more to develop vulnerability summaries of community assets, hazards, risks, and opportunities for each sector described above.

Resilience strategies were derived from a review of the Washington State Department of Commerce’s Model Climate Resilience Element and Menu of Measures,¹ the King County–Cities Climate Collaboration (K4C), and other municipal adaptation plans. The summary of resilience strategies begins with an audit of current policies, and identification of gaps or opportunities to strengthen or add policies. These questions guided the audit of existing policies:

- What goals and policies (measures) explicitly or implicitly build climate resilience?
- How can the measure be amended or supplemented by a new goal or policy to better address Bellevue’s climate-related hazards and impact(s)?

1.1 People Vulnerable to Climate Change

Communities that tend to be more vulnerable to climate stressors are those that are already at greater social and economic risk, including older people, children, low-income families, immigrant communities, and Black, Indigenous, and people of color (BIPOC) individuals. For example, people who are elderly may have more limited mobility or preexisting health conditions, and children under five years old may have a harder time regulating temperature and may have underdeveloped immune systems. Low-income households may be more susceptible to illnesses and have limited resources to adapt or respond to climate change. Communities of color may have cumulative exposures to pollution and health and social disparities. Persons that speak English less than very well may have more difficulties during evacuation and difficulties accessing post-disaster funding.

Although Bellevue is considered a largely affluent community, 25% of households are low-income (households with incomes less than 80% of the Area Median Income). Other demographic risk factors include a high share of BIPOC residents, including those who are foreign born and speak English less than very well, older adults, and those living alone (Table 1). A lack of quality affordable housing is also a risk.

TABLE 1 City of Bellevue Demographic Risk Factors Associated with Neighborhoods

Bellevue Demographic Indicators	Citywide Statistics: 2021	Neighborhoods with Greater Share
Children, <5 years old	4.4%	BelRed, Crossroads, Eastgate, Newport, West Bellevue, West Lake Sammamish
Older Adults, > 65 years old	15.0%	Crossroads, Northeast Bellevue
Communities of Color (non-White, including Hispanic)	56.5%	BelRed, Bridle Trails, Cougar Mountain, Crossroads, Lake Hills, Somerset, West Bellevue
Low-Income Communities (80% below AMI, 2022 figure)	25%	BelRed, Crossroads, Lake Hills, Factoria, Newport
Living Alone	14.6%	BelRed, Downtown
Immigrants (including limited English)		

¹ Menu of Measures: <https://app.smartsheet.com/b/publish?EQBCT=ac5e7c0a46e54f779f35588b1fa2a9c7>

Bellevue Demographic Indicators	Citywide Statistics: 2021	Neighborhoods with Greater Share
Foreign Born	42.0%	
Speak English less than “very well”	16.5%	Linguistic Isolation: Downtown
Disabled	9.5%	Unmapped
Unemployment	3.8%	Crossroads, Newport, Northeast Bellevue, Northwest Bellevue, Woodridge
Outdoor workers	4.1%	Eastgate, Newport, Northeast Bellevue, West Lake Sammamish, Woodridge
Persons with pre-existing or chronic medical conditions, Fair or poor health	8.5%	Crossroads, Eastgate, Factoria, Lake Hills, Newport, Somerset, West Lake Sammamish
Education – less than high school degree	10%	Northwest Bellevue

SOURCE: 2021 ACS 5-Year Estimates (ACS 2020); Seattle-King County Health Department n.d.

Potential impacts to vulnerable populations include:

- An increase in heat-related deaths and illnesses, particularly among the elderly, poor, those living alone, and persons with certain existing disabilities or medical conditions. A study in King County showed an increase in basic life services (BLS) and advanced life services (ALS) with extreme heat events (DeVine et al. 2017).
- Rising temperatures, wildfires, and decreasing summer precipitation will lead to increases in ozone and particulate matter, elevating the risk of cardiovascular and respiratory illnesses and death (Yu 2021). This vulnerability may be more acute for those with existing cardiovascular or respiratory medical conditions, as well as for those who live within an Air Pollution Exposure Zone (APEZ; 500 feet of a major roadway such as I-405). Roughly 13% of Bellevue’s land area is within an APEZ, of which about 18% is zoned for multifamily or mixed-use residential.

In discussing demographic risk factors, it is worth noting that while the planning horizon for the Comprehensive Plan update is 20 years and the climate change impacts are modeled to 2050 or 2080 (see 2.1 Regional Climate Trends), the demographic conditions that increase vulnerability are current. They do not necessarily represent the neighborhood distribution of vulnerable populations or characteristics in the future. It is unknown whether the same neighborhoods will have the same disproportionate distribution of persons with vulnerable demographic characteristics 20, 30, or 40 years from now. This is also not to imply that demographic characteristics such as limited English proficiency, low income, or less education are immutable or hereditary.

1.2 Places Vulnerable to Climate Change

The Bellevue Climate Vulnerability Index (CVI) was developed as part of the vulnerability assessment and is explained in detail in Section 2. The CVI includes 30+ indicators and combines them to form an index that

supports a planning-level view of climate vulnerability in Bellevue to help 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. The CVI combines the results of the three subindices for exposure, sensitivity, and adaptive capacity. Figures 2 and 3 show the index results, geographically illustrating climate vulnerabilities with and without population density.

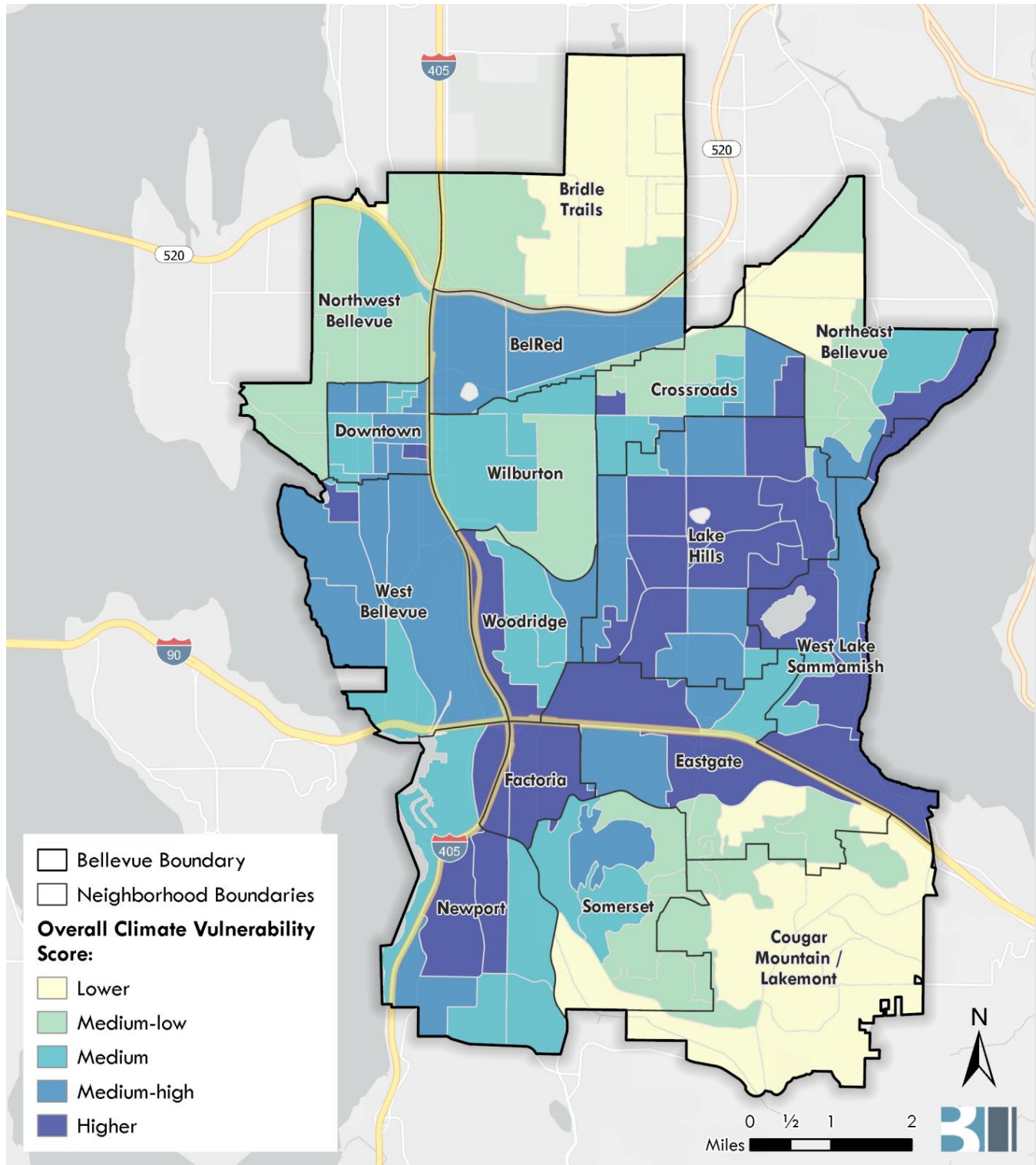
Figure 2 shows climate vulnerability on a single axis: higher or lower (more or less vulnerable). Figure 3 shows two axes: both vulnerability and population. It is useful to look at climate vulnerability both with and without population density because it illuminates areas where higher or lower concentrations of people either increase vulnerability or, in some cases, increase adaptive capacity. It can therefore also illuminate where anticipated changes to population could place more people in vulnerable areas, which can in turn help guide the City in enhancing the adaptive capacity and climate resilience of those areas through mitigation from development impacts.

For example, BelRed has a medium-high index score on Figure 2 without population density accounted for. With population accounted for in Figure 3, BelRed is noted as an area with higher vulnerability and lower population density. As BelRed grows, the City of Bellevue can consider the factors that identify this area as higher vulnerability (e.g. extreme heat exposure, urban heat island, and lower tree canopy) and employ strategies to reduce vulnerability (e.g. green infrastructure, passive cooling, tree planting etc.). Another example is Downtown, which Figure 2 (without population density) shows as medium to medium-high vulnerability due to extreme heat exposure and air quality exposure, and a higher share of older adults and foreign-born persons who may be more vulnerable. However, Figure 3 (combined with population density) indicates a higher level of vulnerability due to the number of people potentially impacted.

Urban Heat Island Effect

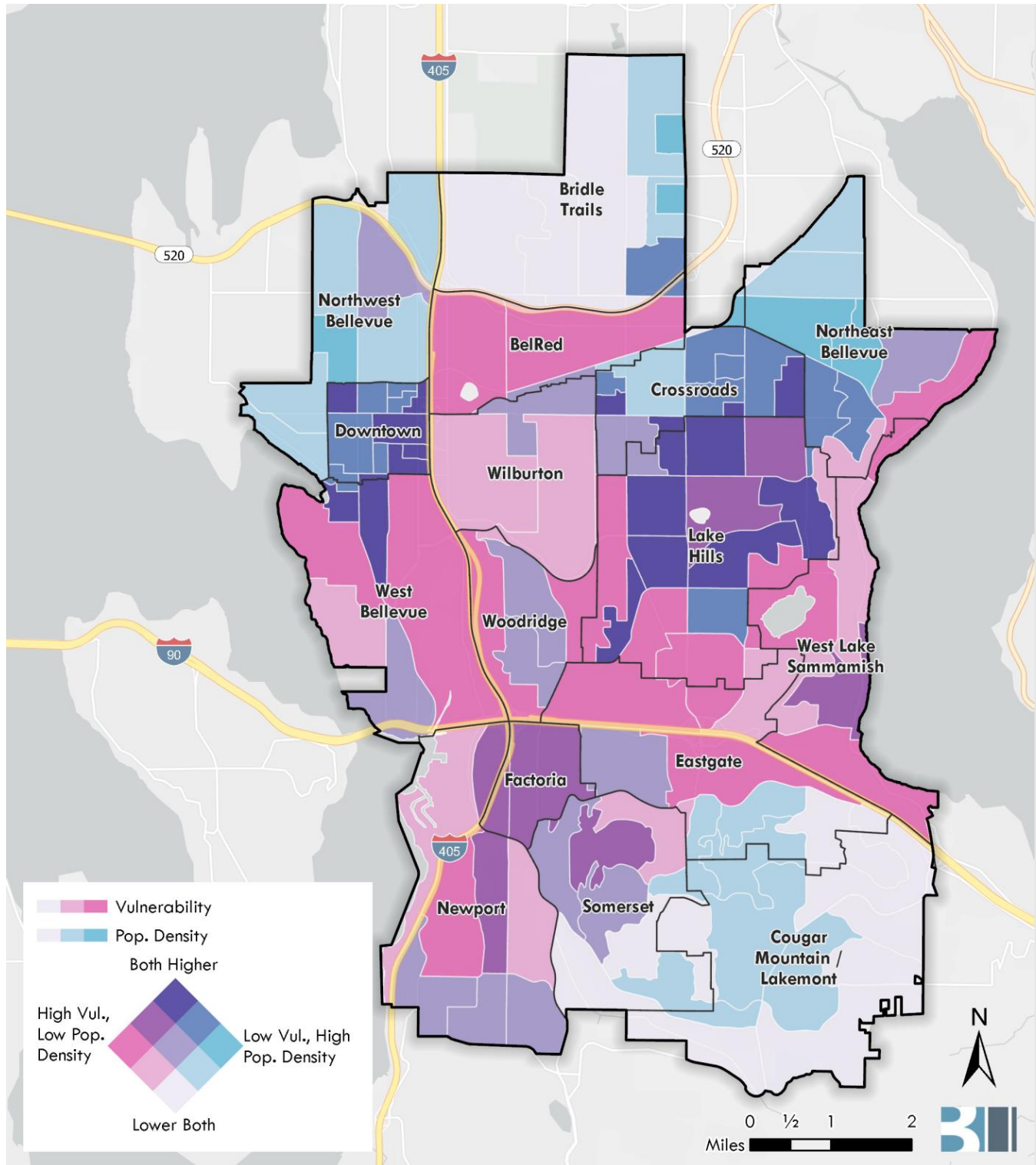
Certain elements of urban development, especially pavement and dark-colored building materials, absorb and re-emit the sun's heat more than natural landscapes or light-colored materials. Urban areas where these elements are highly concentrated and greenery is limited can become "islands" of higher temperatures, compared to outlying areas. This is referred to as the "urban heat island effect."

A review of research studies and data found that in the US, the heat island effect results in daytime temperatures in urban areas about 1–7°F higher than temperatures in outlying areas, and nighttime temperatures about 2–5°F higher. Humid regions (primarily in the eastern United States) and cities with larger and denser populations experience the greatest temperature differences. Research predicts that the heat island effect will strengthen in the future as the structure, spatial extent, and population density of urban areas change and grow ([US EPA](#)).



SOURCE: BERK 2023

FIGURE 2 Climate Vulnerability Index without Population Density



SOURCE: BERK 2023

FIGURE 3 Climate Vulnerability Index with Current Population Density

1.3 Overall Climate Vulnerability Summary

VULNERABILITY SUMMARY

For each sector, the project team evaluated: assets (e.g. people, places, infrastructure, and resources); climate-related hazards; risks and vulnerabilities; and gaps and opportunities for increasing adaptive capacity. At a high level, the potential impacts and risks to sectors of importance in the city include:

- Increased public health risks due to heat and wildfire smoke
- Degradation and loss of habitat and trees (e.g. erosion, water quality, canopy loss)
- Increased flooding and stormwater runoff
- Damage to infrastructure due to flooding or extreme precipitation
- Increased cooling demand in summer and potential for more frequent power loss
- Loss of or damage to cultural/historic sites and culturally significant foods
- Disruption to business continuity
- Shifts in business and recreation opportunities
- Increased demand for emergency services
- Preparing infrastructure for climate impacts
- Recovering from climate impacts and natural disasters, including infrastructure damage
- Damage to housing and risk of displacement

For many of these impacts, the City of Bellevue has existing policies or programs to expand resilience, such as energy conservation and tree canopy plans and protections, which have co-benefits for climate mitigation and adaptation. High-level qualitative climate vulnerability scores for each sector included in this assessment (Table 2) were developed using the following rubrics:

- **Potential Impacts** (assumes assets are exposed to climate change)

- High: Likely to experience major damage or disruption
- Moderate: Likely to experience minor damage or disruption
- Low: Unlikely to experience significant damage or disruption

- **Adaptive Capacity** (based on ability to cope or recover from impacts)

- High: Able to rebound quickly
- Moderate: Able to rebound somewhat quickly
- Low: Unable to rebound quickly

		Potential Impact		
		Low	Moderate	High
Adaptive Capacity	Low	Low	High	Highest
	Moderate	Low	Moderate	High
	High	Lowest	Moderate	Moderate

A more detailed description of sector-specific impacts, vulnerabilities, and adaptive capacities is provided at the end of each sector in Section 3. Those descriptions are based on rigorous analysis but are expressed using the same basic rubric of High/Moderate/Low for each climate impact category (extreme heat, extreme precipitation events, stream temperature, drought, and wildfire/smoke). Table 2 is an aggregate representation of the high-level qualitative scores from each sector, which is why Moderate-High impacts + Moderate capacity may be shown as Moderate-High vulnerability for some sectors but Moderate or High for others. These discrepancies reveal nuances found within those more detailed end-of-sector tables.

TABLE 2 Vulnerability Summary by Sector

Sector	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)
Buildings & Energy	Moderate-High	Moderate	Moderate-High
Cultural Resources & Practices	Moderate-High	Moderate	Moderate-High
Economic Development	Moderate-High	Low-Moderate	Moderate-High
Ecosystems	Moderate-High	Low-Moderate	Moderate-High
Emergency Management	Moderate-High	Moderate	Moderate
Human Health	Moderate-High	Moderate	High
Land Use & Development	High	Moderate	Moderate-High
Transportation	Moderate	Low-Moderate	Moderate
Utilities (Solid Waste, Wastewater, Stormwater)	Moderate	Low-Moderate	Moderate-High
Water Resources	Moderate	Moderate-High	Moderate

SOURCE: ESA & BERK 2023

SUMMARY OF RESILIENCE STRATEGIES

Cities play an important role in reducing greenhouse gas emissions and combatting climate change (Nunn et al. 2019). While the focus of this report is on identifying climate-related vulnerabilities posed to sectors of concern in Bellevue, the consultant team also identified some potential resilience measures that can be considered in departmental programs and projects. Section 4 lists suggested resilience strategies organized by associated sectors (i.e. those with similar vulnerabilities and needed responses). The consultant team also recommended several new Comprehensive Plan policies, or amendments to existing policies, that are responsive to climate change. The list of initial Comprehensive Plan policy recommendations is provided in Appendix 1. Many of these strategies and policies are listed as high-performing measures in the Washington State Department of Commerce Model Climate Element Menu of Measures (April 2023).

Figure 4 illustrates categories of high-performing strategies.

Buildings & Energy, Economic Development, Land Use & Development

Strategies related to these sectors include: energy efficiency, electrification, and renewable power generation for City-owned facilities as well as residential and commercial buildings; strategies to reduce or mitigate the urban heat island effect; and support for local businesses and the green economy.

Cultural Resources & Practices, Ecosystems

Strategies related to these sectors include: protect important historic and cultural sites; provide the public with resources on how to anticipate climate-related impacts and build their resilience; enhance the urban tree canopy, especially in areas prone to extreme heat and other impacts, and manage local forest health and resilience; protect and enhance the resilience of critical habitats and ecosystems, such as by minimizing stormwater runoff into waterbodies.

Water Resources, Utilities (Solid Waste, Wastewater, and Stormwater)

Strategies related to these sectors include: increase the capacity of the stormwater system, where possible by expanding natural stormwater management; utilize existing public communications systems for providing up-to-date information to inform and educate communities about climate issues impacting both flooding and water supply; and account for projected climate impacts and ensure redundancy in critical water systems.

Emergency Management, Human Health

Strategies related to these sectors include: ensure that emergency response plans incorporate projected climate impacts – especially extreme weather events; build redundancy into emergency management alert and other response systems; support the creation of Resilience Hubs to foster community connection and provide support during extreme weather events; and identify and implement ways to support community health during chronic climate-related events such as wildfire smoke.

Transportation

Strategies related to this sector include: targeted infrastructure modifications to anticipate risks of flooding or erosion; paving strategies to reduce heat absorption and extend useful life; collaborate with other departments (such as Emergency Services) and external agencies to ensure access to places of respite from extreme weather events; and improve non-automobile access to basic goods and services.

What is a Resilience Hub?

Resilience Hubs are community-serving facilities augmented to support residents, coordinate communication, distribute resources, and reduce carbon pollution while enhancing quality of life. Hubs provide an opportunity to effectively work at the nexus of community resilience, emergency management, climate change mitigation, and social equity while providing opportunities for communities to become more self-determining, socially connected, and successful before, during, and after disruptions (resilience-hub.org).

CLIMATE ADAPTATION MEASURES

Urban Forest

Add tree canopy especially within urban heat islands. Update tree species selection to be resilient to climate change.



Renewable Energy

Install distributed renewable energy (solar, combined heat and power) on sites or microgrids to provide electricity during power outages or high energy demand days.



Design with Nature

Build green infrastructure projects. Consider stormwater capacity with new climate projections. Restore streams and manage floodplains to be climate resilient.



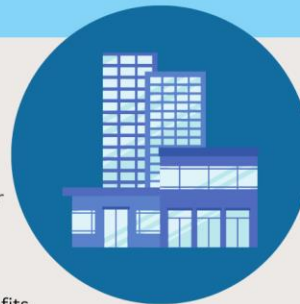
Connected Communities

Provide parks and trails to connect housing, schools, and businesses across the community. Provide multimodal travel options for all including frontline communities. Raise streets in flood-prone areas



Retrofits & Design

Promote resilient building retrofits and designs. Increase passive survivability. Add cool roofs, green roofs or facades, and exterior shade features. Floodproof or relocate structures.



See Commerce Menu of Measures, K4C Climate Toolkit, ULI Resilient Retrofits.

SOURCES: Commerce Menu of Measures, K4C Climate Toolkit 2021, Urban Land Institute (ULI) Resilient Retrofits 2022

FIGURE 4 High Performing Adaptation Measures

1.4 Next Steps

Section 4.2 of this report provides a detailed list of proposed next steps. In general terms, Bellevue can address the findings of the Climate Vulnerability Assessment in its Comprehensive Plan growth strategy and policies. As part of the public engagement process associated with the Comprehensive Plan Periodic Update, and ongoing engagement with overburdened communities, the broader community, and organizational stakeholders, it can help prioritize efforts both citywide and by neighborhood.

SECTION 2 Climate Change in Bellevue

2.1 Regional Climate Trends

Climate is the average weather for a region expected at different times of the year. Climate is usually reported over a span of 30 years. Climate change means a difference in the historical average conditions in a region such as temperature and rainfall.² As noted in Section 1, Bellevue and King County will likely experience a wide range of climate-driven changes:

- Rising air temperatures, extreme heat events, drought, and low soil moisture
- Low streamflow and increasing water temperatures
- Wildfire smoke from fires in the Pacific Northwest
- Increased storm intensity and extreme precipitation events

For this assessment, climate projections were evaluated for the 2050s (2040–2069) or the 2080s (2070–2099), as compared to the historical period of 1981–2010. The 2050s projections align well with the City's 2044 Comprehensive Plan update. The 2080s projections are recommended for longer-range climate planning and are useful in anticipating longer-term trends of climate impacts.

The climate projections are all based on Representative Concentration Pathway (RCP) 8.5, a global emissions scenario developed for the Intergovernmental Panel on Climate Change (IPCC), in which global emissions continue unabated throughout this century. The use of RCP 8.5 is generally considered best practice for climate vulnerability assessments.






Information about climate change considers hazards based on climate and hydrologic models. The direction of climate trends in the county plus local information about conditions in Bellevue can be useful for general planning and assessment, such as climate vulnerability assessments, climate resilience plans, climate action plans, or climate resilience elements in comprehensive plans. Table 3 shares climate change trends expected in 2050 for King County and communities within, including Bellevue. It is generally based on county-level information provided in the Climate Mapping for a Resilient Washington tool (UW CIG 2022). Local stream information is included as well for Kelsey Creek.

2021 Heat Dome, Seattle Region

"...health officials urged people to reschedule outdoor activities and to stay hydrated. Over the next two days, officials said 223 people visited emergency rooms with heat-related illnesses and at least 13 people in King County had died from heat exposure. Restaurants and some grocery stores closed early or altogether on June 28, and hotels saw a flood of people wanting air-conditioned rooms. At 4:14 p.m., the Bellevue Fire Department announced a burn ban, including all recreational fires. Amazon sent workers home from a Kent warehouse, while some office workers at Amazon's Doppler building in downtown Seattle said it felt like the most crowded day since before the pandemic, as workers flocked to air-conditioned offices." (McNerthney 2021)

² NASA Climate Kids: <https://climatekids.nasa.gov/climate-change-meaning/#>.

TABLE 3 King County Median Changes by 2050

	Description of Likely Changes	Indicators
 <p><small>Created by Adrien Coquet from the Noun Project</small></p> <p>Extreme Heat</p>	<p>An increase in average summer temperatures is expected. This can affect people, landscaping, agriculture, and natural areas like wetlands, wildlife habitats, and other ecosystems.</p> <p>More days above 90°F humidex (humidity and heat) are expected, which can affect public health.</p> <p>An increase in the number of cooling degree days is an indicator of greater potential for more cooling demand for buildings in the summer.</p> <p>Hotter days can increase ground-level ozone, a greenhouse gas (GHG).</p>	<p>+ 6.3°F change in average summer (June - August) maximum temperature</p> <p>+ 20.1 days above 90°F humidex</p> <p>+ 287°F-days change in cooling degree days (base 65°F)</p>
 <p><small>Created by Laynik from the Noun Project</small></p> <p>Wildfire & Smoke</p>	<p>There are likely to be more fire-danger days that could affect homes and businesses at the wildland-urban interface (WUI).</p> <p>More wildfire smoke can result in particulates that worsen certain health conditions (e.g. heart and lung disease, pregnancy, etc.).</p>	<p>+ 10 days change in high fire danger days</p>
 <p>Extreme Precipitation & Drought</p>	<p>More frequent and intense storms are expected. This can increase flooding, erosion, and runoff and impact stormwater systems, transportation, and emergency responses.</p> <p>Summer precipitation below 75% of normal is an indicator of drought. The legal definition of drought in Washington State includes less than 75% of normal water supply.</p>	<p>+ 13% change in the magnitude of 25-Year Storm</p> <p>+ 9% change in the magnitude of 2-Year Storm</p> <p>25% chance that a year in the 2040-2069 period will have summer precipitation at or below 75% of normal.</p>
 <p><small>Created by Adrien Coquet from the Noun Project</small></p> <p>Flooding</p>	<p>The county is expected to experience increases in peak streamflow, which would lead to more areas experiencing flooding. This could impact more homes, businesses, farms, and infrastructure.</p>	<p>82% of stream lengths in King County are expected to see 10-50% more streamflow on the day of the year with the highest streamflow.</p> <p>Values mapped in Bellevue: Kelsey Creek +12%</p>
 <p>Changes in Streamflow, Stream Temperature, and Reduced Snowpack</p>	<p>In winter, there may be less stored water in snow, and less water available for streams, soil, and reservoirs. This would affect aquatic species, trees, vegetation, and water supply.</p> <p>Changes in average August stream temperature: Stream temperatures generally warm as air temperatures rise. Warming stream temperatures are an indicator of salmonid health; salmon experience physiological stress at ~17°C and mortality at 20°C and higher.</p>	<p>-76% change in April 1 snowpack</p> <p>Most stream lengths would see -10 to -100% change from historic low streamflow in summer (June-September).</p> <p>Values mapped in Bellevue: -6%</p> <p>In King County, only 6% of stream lengths have a historical baseline of >16°C in August. By the mid-century, over 18% of streams in the county are projected to warm above 16°C.</p>

SOURCES: CIG 2022; U.S. Environmental Protection Agency (EPA) 2022

2.2 Bellevue Climate Vulnerability Index

PURPOSE & APPROACH

The Bellevue Climate Vulnerability Index (CVI) was developed as part of the Bellevue Climate Vulnerability Assessment. The CVI is a more fine-grained and quantitative approach to identifying vulnerabilities and capacities. While the overall vulnerability of an area or sector is *expressed* in this report as being High, Moderate or Low (or gradations in-between), the CVI is the analytic framework on which those assessments of vulnerability are based.

Climate vulnerability in the context of the CVI is defined as (1) exposure to a changing climate based on regional trends for extreme heat and precipitation, and (2) an overall vulnerability index made up of three subindices:

- A sub-index reflecting local environmental conditions including flooding, air quality, and heat data
- A sub-index reflecting the inherent sensitivity of people (e.g. health or age) or environments (e.g. geologic hazards, water quality) to a changing climate
- A sub-index regarding the capacity of the community and place to cope or adapt to the impacts of a changing climate

The conceptual formula is:

$$\text{Climate Vulnerability} = \text{Regional Climate Change Exposures} + \text{CVI (Local Environmental Exposures Sub-index} \\ + \text{Sensitivity Sub-index} + \text{Adaptive Capacity Sub-index)}$$

The CVI combines 30+ indicators (Table 4) to form an index that supports a planning-level view of climate vulnerability in Bellevue, to help 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.³

For example, some areas are more vulnerable due to extreme heat, such as urban heat islands with more pavement and fewer trees, or areas with a higher concentration of older residents. Some areas, such as floodplains and landslide hazard areas, are vulnerable to extreme precipitation events, as are individuals who live alone or have less access to a vehicle. The CVI provides information useful for Bellevue to develop strategies to enhance the city's resilience over the medium and long term. The strategies can be included in plans, budgets, partnerships, and more.

The remainder of this section (2.2) explains the individual elements of that conceptual formula in greater detail, beginning with regional climate change exposures.

³ The CVI sums over 30 indicators of climate vulnerability at the parcel level and displayed at larger and/or generalized geographies (e.g., census block groups, heat maps, etc.), which help to identify where Bellevue is more or less vulnerable to climate change. The indicators are drawn from literature and studies regarding social vulnerability, health, environment, and climate change.

REGIONAL CLIMATE CHANGE EXPOSURES

There are a number of regional climate change impacts that people, ecosystems, and infrastructure can be exposed to. This report focuses on two of the most significant: extreme heat and extreme precipitation events. (Exposures to other regional climate impacts such as wildfire smoke are addressed in the Climate Vulnerability Assessment qualitatively.) As described in the conceptual formula above, the regional exposure indicators (extreme heat and extreme precipitation events) are distinct from the Climate Vulnerability Index (CVI), but are considered in relation to local environmental exposures, sensitivity conditions, and adaptive capacity conditions (i.e. the three CVI sub-indices).⁴ So while regional exposures are not part of the CVI, they are part of the overall assessment of climate vulnerability in Bellevue.

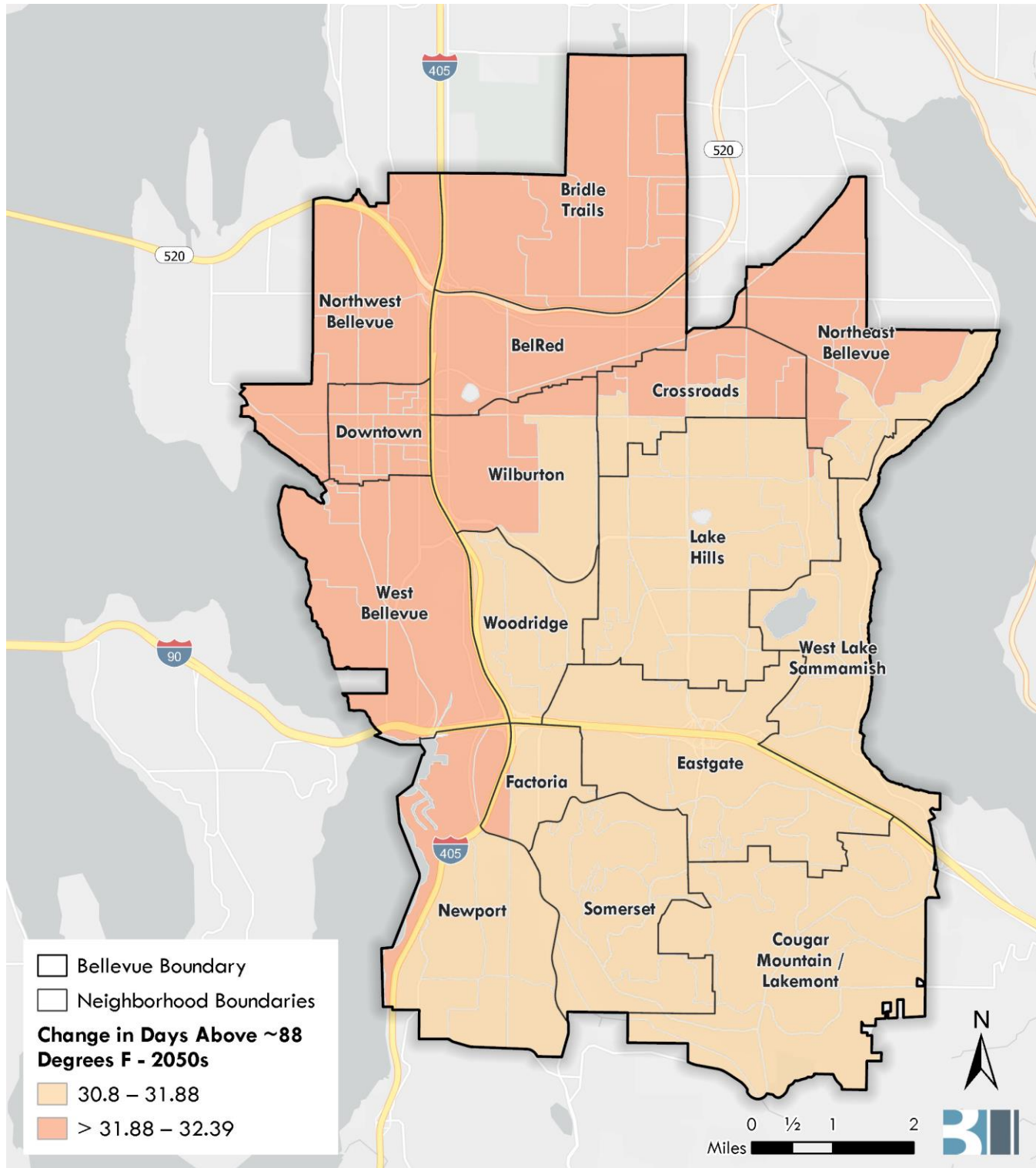
The regional extreme heat and precipitation exposure data are shown in Figure 5 and Figure 6, respectively.

Extreme Heat

Extreme high temperatures are anticipated to increase over historic conditions. In Bellevue by 2050 the change in the number of days above 88 degrees Fahrenheit (°F) humidex (heat and humidity) is projected to increase by 30.8 to 32.4 days. The modeled historical average for King County as a whole is 5 days. Although the projected increase in number of extreme heat days is significant to Bellevue as a whole, the data do not indicate strong geographic variability—less than 1-2°F across the city. The specific geographic distribution shown in Figure 5 is likely a result of downscaling regional model data to Bellevue; mapping urban heat islands (which are included in the CVI) is a more accurate means of identifying highly local areas where vulnerability to extreme heat is expected to be higher. Figure 5 clearly shows how much extreme heat days are projected to increase throughout Bellevue.

The change in the number of 88°F humidex days is an indicator of stress on public health. Local exposure data regarding heat islands can provide local geographic information where extreme heat would be more or less felt. Combined with impervious area, lack of tree canopy, and populations with age or health conditions, some areas of Bellevue could be more vulnerable.

⁴ Regional exposure is not included in the CVI because the indicators that make up the CVI are local and specific to Bellevue, while regional exposure to extreme heat and precipitation does not appear significantly different across a city the geographic size of Bellevue.



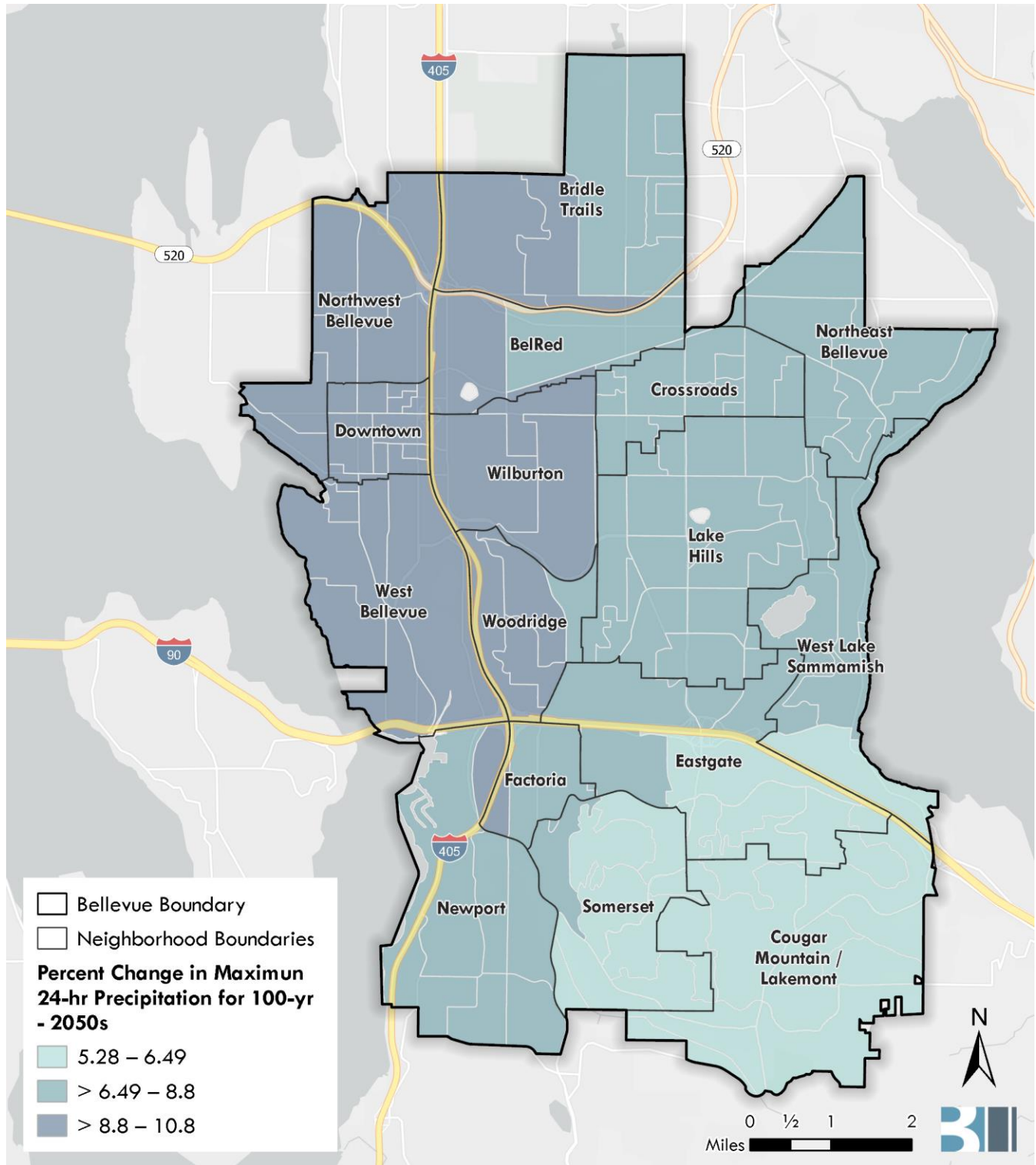
SOURCE: BERK 2023; DeVine et al. 2017

FIGURE 5 Extreme Heat Change in Days above 88 Degrees F Humidex – 2050s

Extreme Precipitation Events

The intensity of rainstorms is anticipated to increase at greater likelihood intervals (2-year or 25-year) and at lesser likelihood storms (100-year), stressing stormwater systems and increasing flood risk. Figure 6 illustrates the projected percentage change in Maximum 24-Hour Precipitation for the 100-Year Storm by the 2050s. The percent change could differ by 5.3% to 10.8% from south to central to west Bellevue. This significant difference in rainfall within the city can likely be attributed to downscaling regional model data to Bellevue (as with extreme heat, the precipitation models are scaled to regional, rather than local, impacts). The greater geographic variability in projected rainfall across the city may also be a result of greater uncertainty in how climate change will affect local precipitation patterns and volumes. Figure 6 does clearly show that projected increases in high intensity rainfall events could be significant.

This indicator can be used to consider how climate change could affect stormwater system capacity, floodplain conditions and localized flood risk, and erosion and landslide potential.



SOURCE: UW CIG 2022; BERK 2023

FIGURE 6 Extreme Precipitation Exposure

CVI INDICATORS

An index is a calculation used to summarize multiple datasets into one measure and normalizes or standardizes dissimilar data. This index uses the *standard score*⁵ where for each indicator dataset, values are standardized by calculating the corresponding score for each value, creating an “apples-to-apples” measure by which dissimilar datapoints can be compared.

To visually present the CVI, final index values are classified based on quintile categorization, which distributes the values into five groups of an equal number of values based on the total range of scores. The final group results in **low**, **medium-low**, **medium**, **medium-high**, and **high** vulnerability classifications, emphasizing the relative nature of the calculation.

Table 4 shows the exposure, sensitivity, and adaptive capacity indicators selected for the index. Note that a (+) indicates greater vulnerability (higher exposure, higher sensitivity, and *lower* adaptive capacity).

- **Local Exposure Sub-index:** This sub-index contributes to the CVI and is comprised of equal parts flooding, air quality, and heat, considering local conditions. (Although they are not part of the CVI itself, regional climate exposures interact with these local sub-indices. For example, extreme precipitation could exacerbate the depth and extent of flooding; extreme heat can exacerbate the health conditions of persons also exposed to air pollution or be magnified by local environmental conditions such as fewer trees and more pavement.)
- **Sensitivity Sub-index:** Sensitivity is the component of the CVI addressing attributes inherent to the population or place that predispose them to increased impacts from climate exposure. The indicators for sensitivity are categorized into sub-categories of age, environment, and health conditions, as described below.
- **Adaptive Capacity Sub-index:** Adaptive capacity is the component of the CVI addressing attributes related to a population or environment’s capacity to adapt to increased exposure and/or sensitivity to climate change impacts. The indicators for adaptive capacity are categorized into sub-categories of socioeconomic, transportation, housing/built environment, employment, health, and environmental/ecological, as described below.

These components—exposure, sensitivity, and adaptive capacity—taken together create the CVI.

⁵ Also called a ‘z-score’ – this is a statistical measure that describes how many standard deviations away from the mean a given value is. Scores greater than the mean have a positive value, and scores less than the mean have a negative value. For each component of climate vulnerability (exposure, sensitivity, and adaptive capacity), the indicators are standardized and then averaged to create an average z-score for each component. These three component z-scores are then averaged together to create the final CVI value.

TABLE 4 Indicators for Bellevue CVI

Sub-Category	Indicator
LOCAL EXPOSURE	
Extreme Heat	(+) Urban heat island
Air Quality	(+) Air Quality (PM2.5)
Extreme Precipitation	(+) 100-yr Floodplains (potentially include 500-yr Floodplains)
	(+) Historically Flood-Prone Areas
SENSITIVITY	
Age	(+) Under 5 years old
	(+) Over 65 years old
Environment	(+) Geologically Hazardous Areas (steep slopes/ liquefaction/ landslide hazards)
	(+) Poor Stream/Waterbody Health – 303d list for bacteria, dissolved oxygen, and temperature
Health Conditions	(+) Diabetes – crude rate in population >= age 18
	(+) Asthma – crude rate in population >= age 18
	(+) Respiratory Disease - COPD – crude rate in population >= age 18
	(+) Coronary Heart Disease – crude rate in population >= age 18
	(+) Poor Physical Health – crude rate in population >= age 18
	(+) Poor Mental Health – crude rate in population >= age 18
ADAPTIVE CAPACITY	
Socioeconomic	(+) People of Color
	(+) Population Experiencing Poverty
	(+) Low Educational Attainment – less than high school degree
	(+) Linguistic Isolation – households with limited English speaking at home
	(+) Living Alone – households comprised of householder living alone

Sub-Category	Indicator
	(+) Housing Cost Burden – renter households spending >30% of income on housing
	(+) Access to Vehicle – households without access to a vehicle
Transportation	(-) Access to Frequent Transit
Housing/Built Environment	(+) Housing Condition – houses built before 1960
	(+) Affordable Housing Inventory
	(+) Impervious Surfaces
	(-) Proximity to City-Owned Facilities that increase adaptive capacity (libraries, community centers, fire stations)
Employment	(+) Unemployment
	(+) Outdoor Professions – jobs likely to be performed outside (NAICS codes 11, 21, and 23)
Health	(+) Adult Population Without Health Insurance
Environment/ Ecologic	(-) Tree Canopy Coverage
	(-) Access to Parks/Open Space

NOTES: A (+) means that a higher indicator value contributes to a *higher* index value, while a (-) means that a higher indicator value contributes to a *lower* index value.
COPD = chronic obstructive pulmonary disease.
NAICS = North American Industry Classification System

CLIMATE VULNERABILITY INDEX MAPS

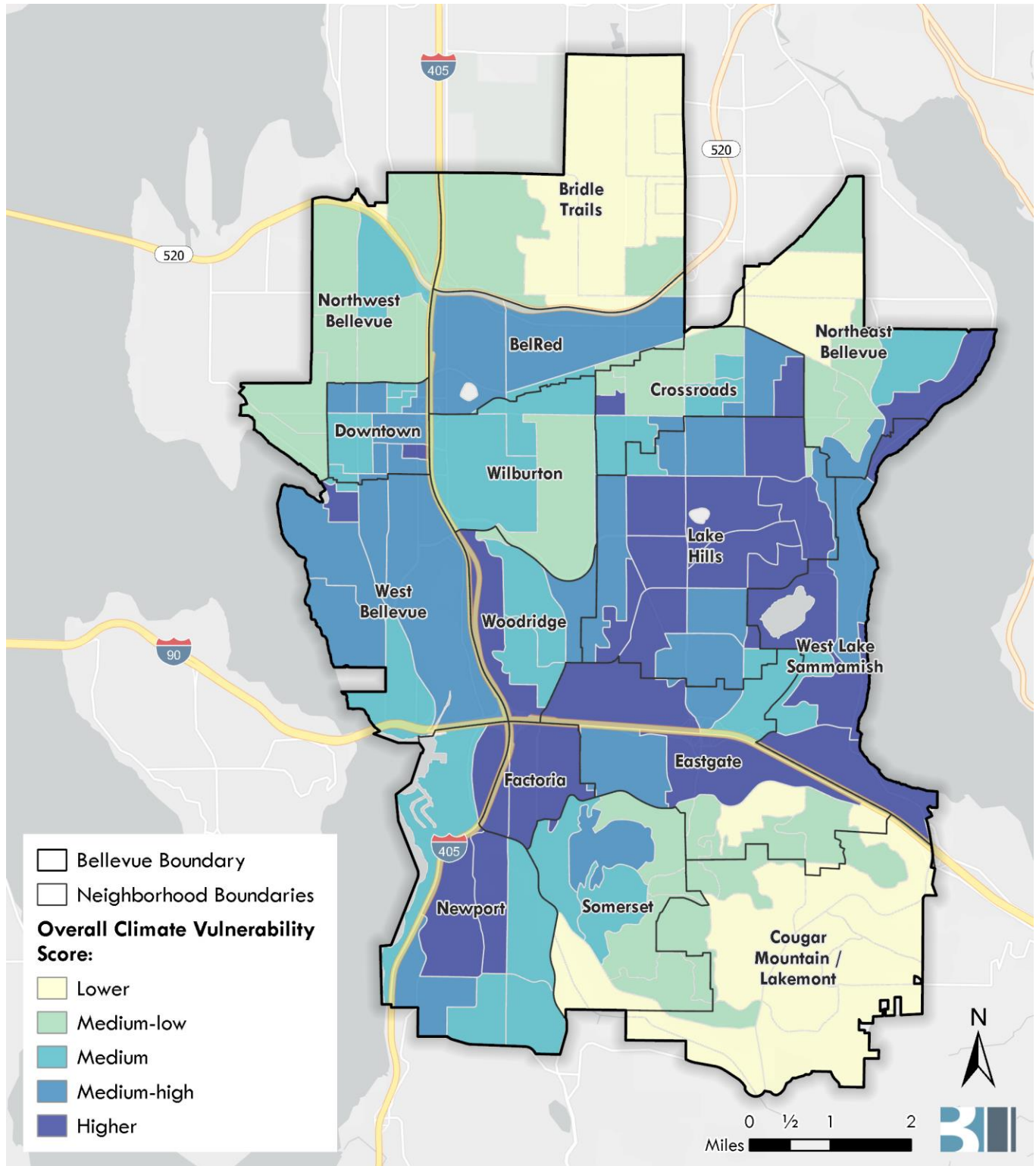
The indicators in Table 4 were used to calculate index values and a map of the overall CVI (all indicators) is shared below without population density (Figure 7) and with population density (Figure 8). It is useful to look at climate vulnerability both with and without population density because it illuminates areas where higher or lower concentrations of people either increase vulnerability or, in some cases, increase adaptive capacity. It can therefore also illuminate where anticipated changes to population could place more people in vulnerable areas, which can in turn help guide the city in enhancing the adaptive capacity and climate resilience of those areas through mitigation from development impacts.

When looking at these maps, it is important to keep in mind that they express broad categories of vulnerability based on 30+ indicators. They are intended to provide a high-level view of comparative vulnerability across the city; they are not intended to provide detailed information about what makes specific areas more or less vulnerable. Many of the sector-specific assessments in Section 3 include this more detailed geographic breakdown of vulnerability.

That said, some of the factors that increase or decrease the vulnerability of a given area may be known, at least in general terms. For example, BelRed has a medium-high index score on Figure 7 without accounting for population density. With population accounted for in Figure 8, the vulnerability index score for BelRed goes up (higher vulnerability), because it is an area that combines exposure indicators (e.g. extreme heat exposure, urban heat island) with low population density which may correlate with low adaptive capacity (e.g. less transit access, fewer parks, less tree canopy). That combination indicates higher vulnerability that is only apparent once population density is accounted for.

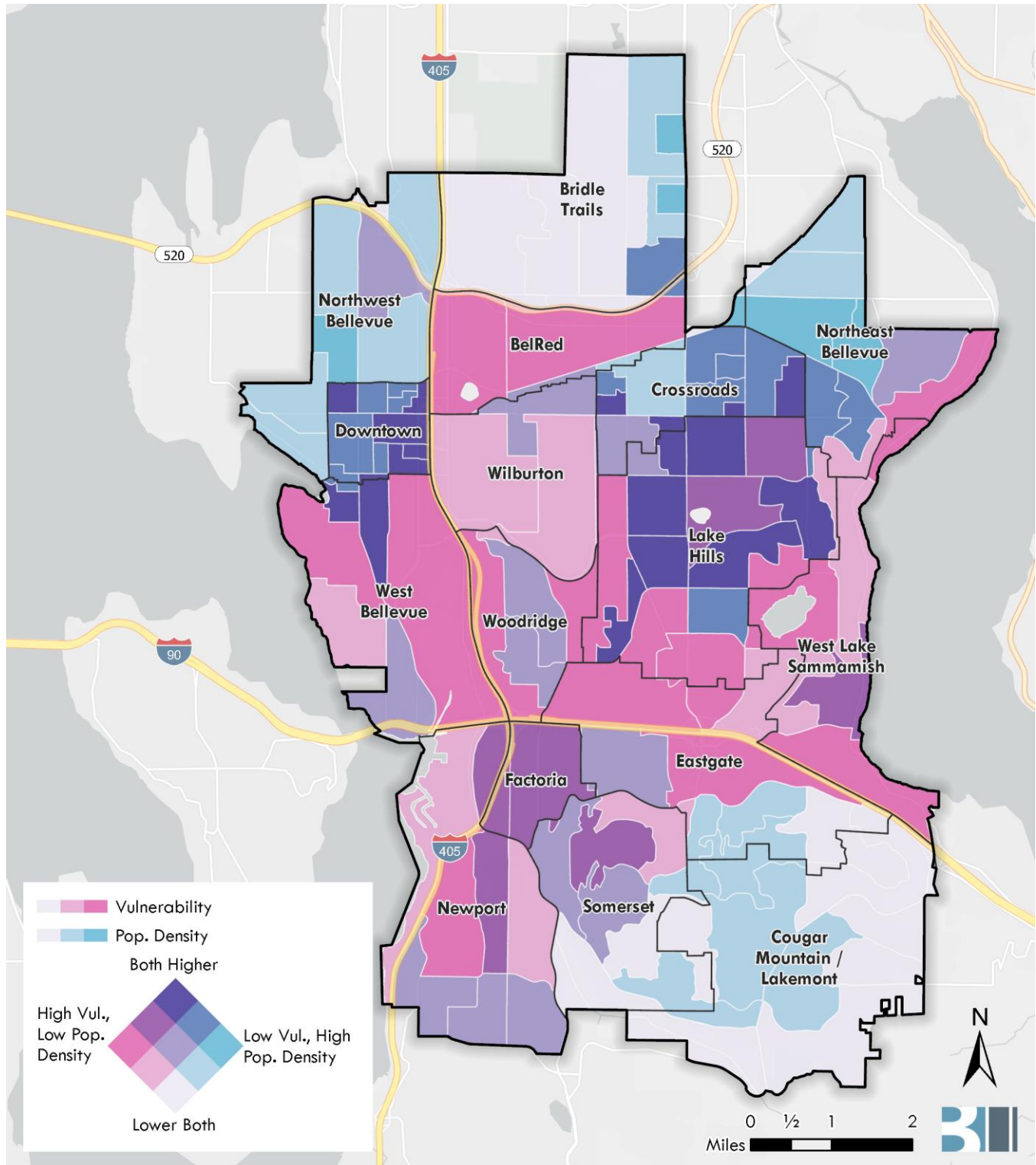
These indices will likely change over time as underlying conditions change and/or the data improves. Looking again at the BelRed example, as the area continues to grow and develop, the City can consider and employ strategies to reduce vulnerability. Such strategies also benefit from a combinatorial effect, where actions to reduce exposure (e.g. increased tree canopy and other green infrastructure, passive cooling) interact with actions to increase adaptive capacity (e.g. the arrival of mass transit, greater walkability and non-motorized transportation options, more parks) to reduce vulnerability for more people as population density increases.

This climate vulnerability information is meant to support the planning level review of Comprehensive Plan growth alternatives. The City of Bellevue will consider multiple factors in its selection and refinement of a preferred alternative.



SOURCE: BERK 2023

FIGURE 7 Climate Vulnerability Index without Population Density



SOURCE: BERK 2023

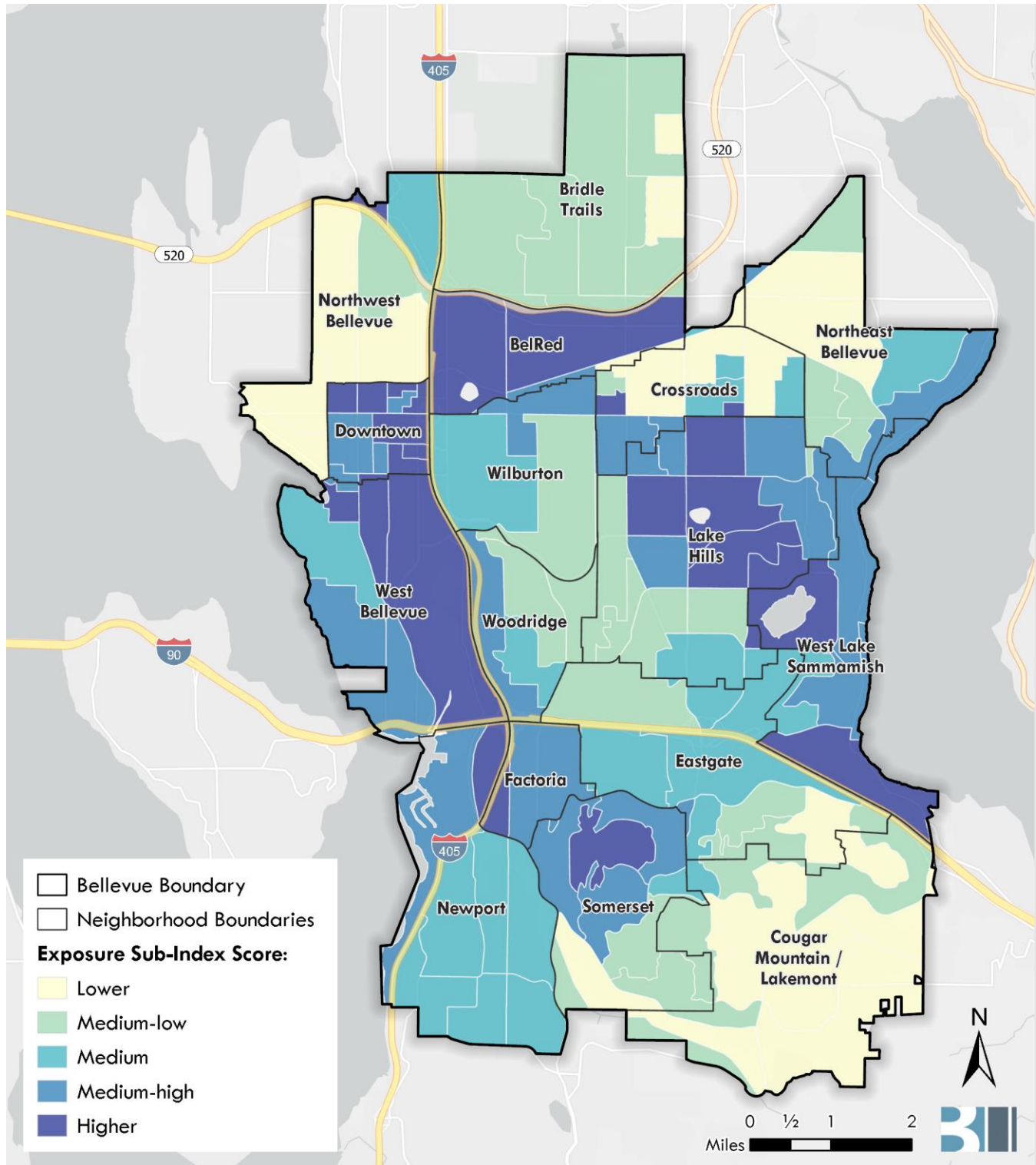
FIGURE 8 Climate Vulnerability Index with Current Population Density

LOCAL EXPOSURE SUB-INDEX MAP

This map shows aggregate local environmental exposure, based on the following data points included in the Local Exposure sub-index:

- **Flooding:** Floodplains and Historical flooding hot spots
- **Air Quality:** CLINE modeled PM2.5 concentrations. This represents Average Modeled Concentration of Particulate Matter 2.5 (e.g. air particles that are 2.5 microns or less in width that pose a high risk to human health)
- **Heat:** King County evening heat index. Generally, there are heat islands in west, central, and east Bellevue.

These three categories (flooding, air quality, and heat) are equally weighted. The results of the sub-index show relatively higher exposure to local environmental conditions in BelRed, Lake Hills, West Lake Sammamish, Somerset, Factoria, West Bellevue, and Downtown, in clockwise order (Figure 9). In Downtown and BelRed, there is greater local exposure to air pollution and heat islands. In Lake Hills and West Lake Sammamish, there is local exposure to heat islands and flooding (based on land area within floodplains). In West Bellevue and Factoria, there is exposure to flooding hot spots, air pollution, and heat islands.

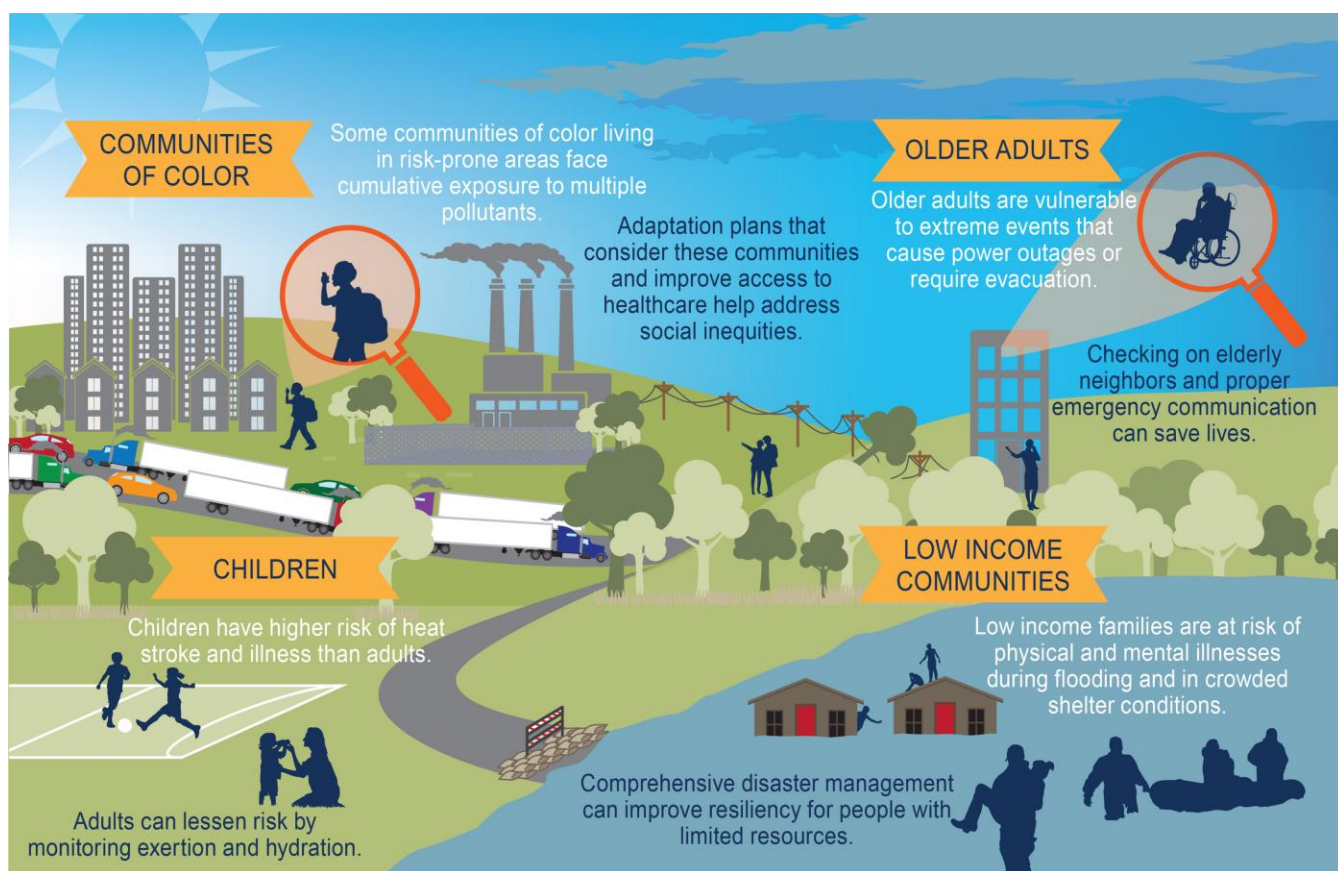


SOURCE: BERK 2023

FIGURE 9 Local Environmental Exposure Sub-Index

SOCIAL VULNERABILITY & SENSITIVITY AND ADAPTIVE CAPACITY SUB-INDICES MAPS

Based on social vulnerability and climate change research, communities that tend to be more sensitive to climate stressors include older people, children, low-income families, and people of color and immigrant communities (Figure 10). People who are elderly may have more limited mobility or preexisting health conditions, and children under five years old may have a harder time regulating temperature and/or underdeveloped immune systems. Low-income households may be more susceptible to illnesses and have limited resources to adapt or respond to climate change. Communities of color may have cumulative exposures to pollution and health and social inequities. People who speak English less than very well may have more difficulties during evacuation and difficulties accessing post-disaster funding and other resources.



SOURCE: EPA 2018

NOTES: Examples of populations at higher risk of exposure to adverse climate-related health threats are shown, along with adaptation measures that can help address disproportionate impacts. When considering the full range of threats from climate change as well as other environmental exposures, these groups are among the most exposed, most sensitive, and have the least individual and community resources to prepare for and respond to health threats. White text indicates the risks faced by those communities, while dark text indicates actions that can be taken to reduce those risks.

FIGURE 10 Vulnerable Populations

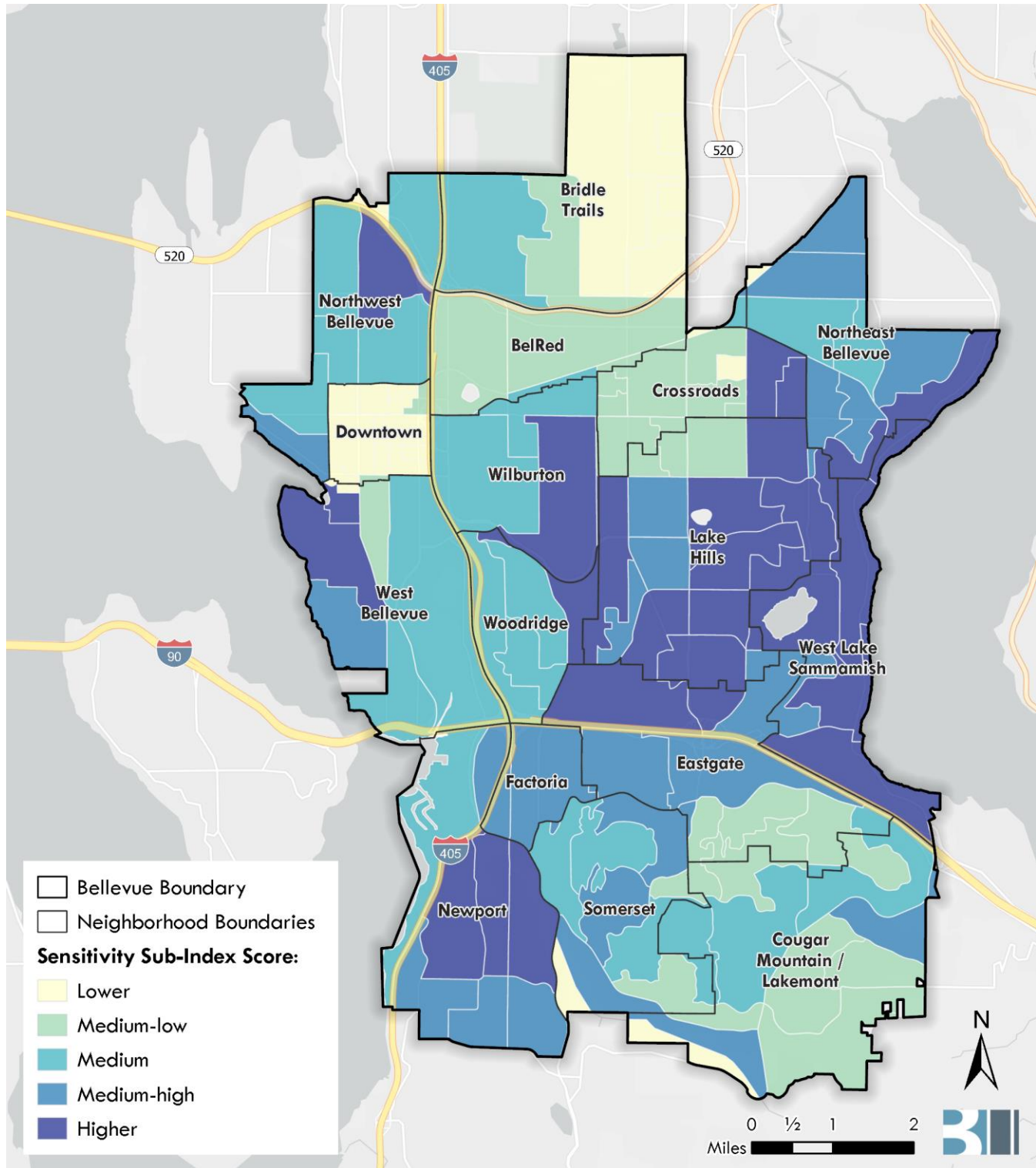
Understanding the location and number of populations that are more sensitive or less adaptable to climate change events can help communities develop strategies to increase resilience.

Examples of sensitivity indicators (e.g. under 5 years old, over 65 years old, air quality) and adaptive capacity indicators (e.g. heat island, linguistic isolation) in Bellevue are shared below in the sub-indices for sensitivity and adaptive capacity.

Sensitivity Sub-Index

The sensitivity sub-index addresses a variety of health or environmental conditions that represent conditions unchangeable at the time of the climate stressor (Figure 11).

- **Age:** Under 5 years old and Over 65 years old (as a percentage of population):
 - *Population Age 65 Years or Older:* Generally higher shares in north and east Bellevue
 - *Age under 5 Years:* Generally higher in central and west Bellevue
- **Environment:** Geologic Hazard Areas (liquefaction, steep slopes, erosion) and Poor Stream/Waterbody Health – 303d list for bacteria, dissolved oxygen, and temperature:
 - *Seismic/liquefaction hazards* are mostly along West Lake Sammamish and West Bellevue, but can also be found in certain locations throughout the city where historic wetlands and streams have been covered with fill.
 - *Steep slopes* are found in most neighborhoods with greater concentrations in east, south, and west areas of Bellevue.
 - *Erosion* is more prevalent in the northern half of Bellevue and along both lakes, as well as in the Coal Creek basin.
 - *Poor waterbody health* is found in Wilburton, West Bellevue, and the south end.
- **Health Conditions:** Diabetes, Asthma, Respiratory Disease – COPD, Coronary Heart Disease (Adults), Poor Physical Health (Adults), Poor Mental Health (Adults):
 - *Poor Physical Health:* Generally central and south Bellevue



SOURCE: BERK 2023

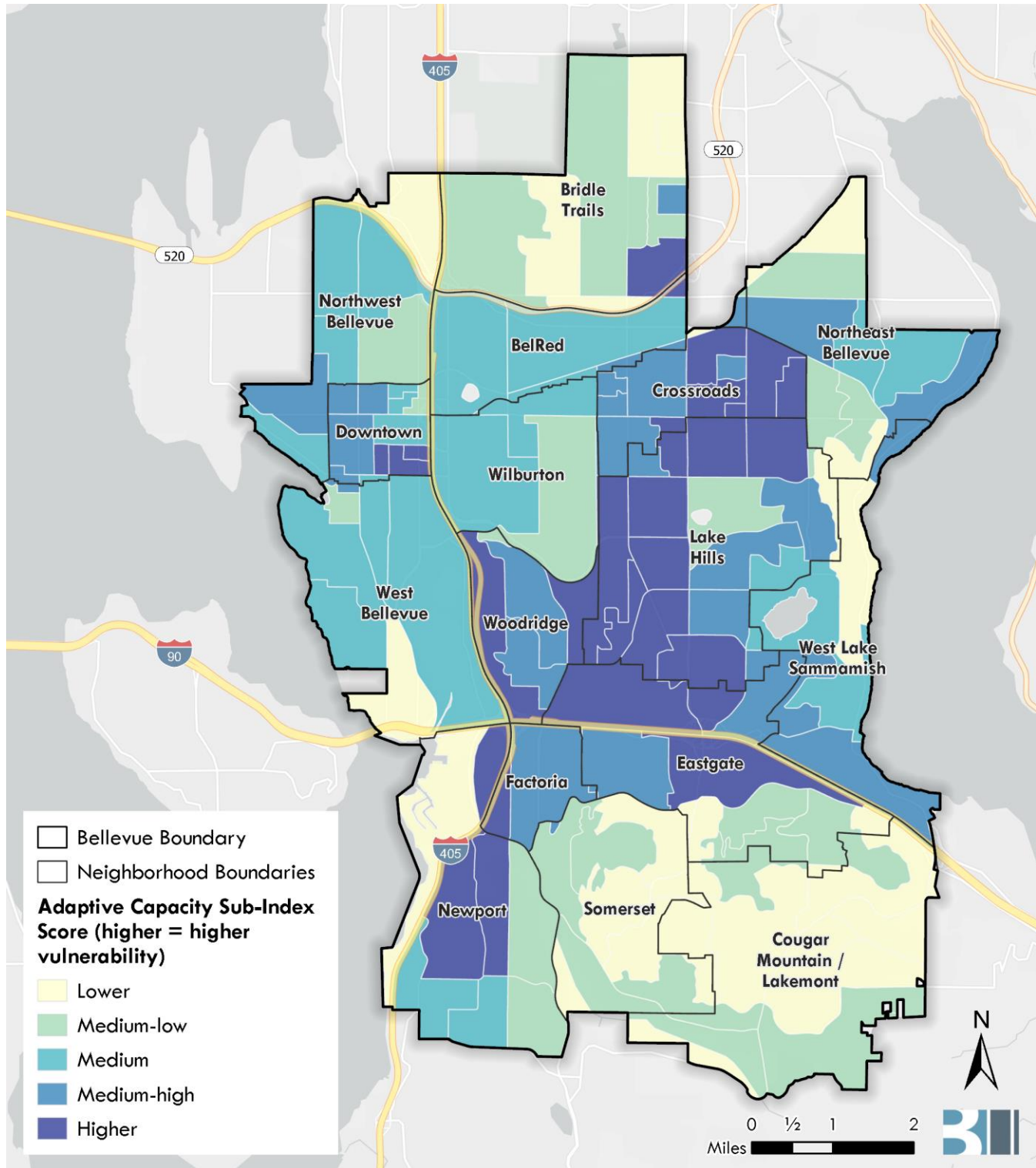
FIGURE 11 Sensitivity Sub-Index

Adaptive Capacity Sub-Index

A wide variety of indicators are part of the adaptive capacity sub-index including:

- **Socioeconomic:** Race, poverty, lesser education, linguistic isolation, lack of vehicle, other
- **Transportation:** Access to Frequent Transit (current)
- **Housing/Built Environment:** Housing condition (built before 1960), affordable housing inventory, impervious surfaces, proximity to libraries, community centers, fire stations
- **Employment:** Unemployment, Outdoor Professions
- **Health:** Adult Population Without Health Insurance
- **Environmental/Ecological:** Tree Canopy Coverage, Access to Parks

The areas with more vulnerable populations and lower-quality built environment conditions (e.g. less tree canopy, more impervious surface) are shown in Figure 12. There are more areas with higher vulnerability, (e.g. a higher score on the Adaptive Capacity Index below) in Crossroads, Lake Hills, Eastgate, Newport, Factoria, Woodridge, and Downtown.



SOURCE: BERK 2023

FIGURE 12 Adaptive Capacity Sub-Index

2.3 Planning for Climate Change in Bellevue

The City of Bellevue has developed several plans and programs addressing climate change mitigation and adaptation. Highlights of these plans and efforts are listed below.

BELLEVUE COMPREHENSIVE PLAN

The current Comprehensive Plan sets forth a growth strategy for the year 2035 (see below for the 2044 update underway), with a future land use plan and many elements describing goals, policies, and implementation strategies. Bellevue's Comprehensive Plan policies are used to guide decisions on capital investments, development permits, and more. Bellevue has addressed climate change in its Comprehensive Plan Environment Element with some key policies, such as:

- EN-6. Establish an achievable citywide target and take corrective actions to reduce greenhouse gas emissions such as reducing energy consumption and vehicle emissions, and enhancing land use patterns to reduce vehicle dependency.
- EN-7. Develop and implement climate change adaptation strategies that create a more resilient community by addressing the impacts of climate change to public health and safety, the economy, public and private infrastructure, water resources, and habitat.

ENVIRONMENTAL STEWARDSHIP PLAN

Bellevue adopted the *Sustainable Bellevue: Environmental Stewardship Plan* in December 2020 with 78 actions meant to be a strategic roadmap to achieving the following targets over the 2020-2050 period (City of Bellevue Community Development 2020a):

- Reduce GHG emissions by 80% by 2050 and prepare for a changing climate
- Use 30% less energy and the energy used will be 100% renewable
- 100% of households will live within a third of a mile of a park, open space, or trail; increase tree canopy by 600+ acres
- 100% of vehicles will be electric; drive alone less than 45% of the time to work
- Strive toward zero waste and recycle 90% or more of all waste
- The city will lead by example

The plan includes action C.1.1 Climate vulnerability assessment: Perform a climate vulnerability assessment to understand long-term risks and vulnerabilities associated with climate change and identify next steps in terms of enhancing resiliency.

REGIONAL PLANNING, KING COUNTY CITIES CLIMATE COLLABORATION (K4C)

Bellevue is a key member of the King County–Cities Climate Collaboration or K4C. In addition to King County, 24 cities participate, representing 85% of the county population. The collaborative offers

workshops, resources, and other information for staff and legislative representatives. A recent tool helpful to long-range planning includes a Climate Action Toolkit looking at the effectiveness of different climate strategies (K4C 2021).

The revised K4C Joint Commitments, signed by the Bellevue City Council in 2020, include commitment X. Climate Preparedness Pathway: Increase community resilience by planning and preparing for the impacts of climate change on K4C communities and the King County region.

STEWARDSHIP PLAN PROGRAMS

Bellevue has set up programs or initiatives to help fulfill its Stewardship Plan outlined below. These programs not only help to reduce GHG emissions and enhance sustainability, but also support climate resiliency. These efforts include:

- **Buildings and Energy:** Bellevue has a Clean Buildings Incentive Program with a team of experts to help benchmark building energy use and strategies to save energy. Bellevue has partnered with Issaquah, Kirkland, Mercer Island, and Redmond to develop the Energy Smart Eastside program, which offers incentives, education, and support for residents to install energy efficient heat pumps. Program incentives are targeted towards low and moderate income households, to support the most vulnerable in decreasing their energy burden and increasing their resilience during high heat and smoke events, through the air conditioning provided by heat pumps.
- **Climate Change and Air Quality:** Bellevue has developed a Greenhouse Gas Emissions Inventory to track communitywide emissions. The City of Bellevue has also committed to reducing emissions associated with its government operations.
- **Green Business:** Bellevue offers a Refresh Recycling program with consultation to understand services for businesses. Bellevue offers a Commute Trip Reduction program that fulfills state requirements and helps manage transportation demand. Bellevue also participates in EnviroStars, a free one-stop hub to get information, resources, and recognition for businesses.
- **Transportation and Electric Vehicles:** Bellevue plans for active transportation through a Pedestrian and Bicycle Transportation Plan. The City of Bellevue owns and operates 15 electric vehicle charging stations available for public use at City facilities. Bellevue is also working on facilitating permitting for installing charging stations on private properties.
- **Trees:** Bellevue assesses its tree canopy every several years and has a 39% tree canopy as of 2019. The City of Bellevue is also reviewing and updating its Tree Code to improve tree preservation, protection, and replacement to support the long-term health and growth of Bellevue's tree canopy.
- **Bellevue Climate Challenge:** The Bellevue Climate Challenge is a program of the Eastside Climate Challenge, along with Redmond, Issaquah, and Mercer Island. It includes a voluntary online tool to allow households to develop an energy profile and identify how to reduce impacts.
- **Stormwater Management Program:** Through the City's National Pollution Discharge Elimination System Program, Bellevue has a comprehensive suite of best management practices in place to prevent and address pollution.

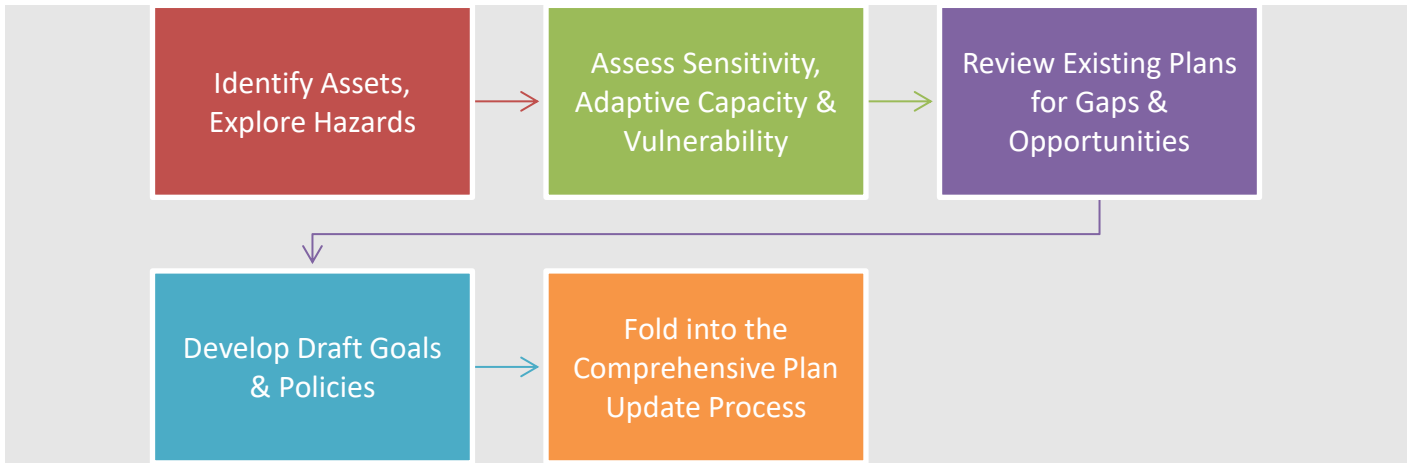
Many of these initiatives have multiple co-benefits that support climate resiliency. The Energy Smart Eastside program is focused on reducing energy use and greenhouse gas emissions associated with heating, but it also increases community resilience by focusing on low-income households and those most vulnerable to extreme heat, since heat pumps provide air conditioning. Preserving and growing Bellevue's tree canopy has multiple benefits including preserving ecological functions, improving air quality, managing stormwater, reducing urban heat island effect, enhancing neighborhood livability, and preserving community character.

BELLEVUE 2044 AND COMMERCE MODEL CLIMATE ELEMENT

Bellevue is working on its Comprehensive Plan Periodic Update (CPPU), called [Bellevue 2044](#). The plan is scheduled for adoption in 2024, covering a 20-year period and setting a new plan for growth and sustainability through 2044. Bellevue received a grant to prepare this Climate Vulnerability Assessment from the Washington State Department of Commerce as part of the CPPU. This assessment will help the City of Bellevue respond to new legislation ([HB 1181](#)), which amended the Growth Management Act, chapter 36.70A RCW (GMA), to require a climate change and resiliency element as part of a comprehensive plan. If funds are appropriated, then the GMA would require Bellevue to include this climate change and resiliency element as part of its first implementation progress report in 2029. To address the requirements of the legislation, the climate change and resiliency element can be a new element or incorporated into the existing Environment element, and must address both greenhouse gas emissions reductions (mitigation) and climate resilience (adaptation).

Through an interagency effort,⁶ Commerce developed a Draft Model Climate Element with resilience planning guidance to illustrate how counties and cities can develop and implement plans, goals, and policies that build communitywide climate resilience (Washington State Department of Commerce 2023). The Draft Model Climate Element recommendations have been considered in this document, including identifying, for each sector, potential climate change-related hazards and vulnerabilities in Bellevue. Based on a review of gaps and opportunities, the City of Bellevue can develop draft goals and policies and fold them into the comprehensive plan update (Figure 13).

⁶ Washington State [Department of Commerce](#), Washington State Department of Transportation, Department of Ecology, Department of Health, Department of Fish & Wildlife, Department of Natural Resources, and Military — Emergency Management Division. The core team also includes members from the UW Climate Impacts Group, Municipal Research & Services Center, and Association of Washington Cities.



SOURCE: Washington State Department of Commerce 2023

FIGURE 13 Draft Model Climate Element Resilience Sub-Element Development Process

SECTION 3 Climate Vulnerability Assessment

3.1 Buildings & Energy

3.1.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for buildings and energy infrastructure. Land use patterns and development regulations are addressed in **3.7 Land Use & Development**. The City of Bellevue regulates buildings and construction and applies energy codes. It also incentivizes green buildings. The City of Bellevue is setting ambitious goals to promote renewable energy and reduce greenhouse gas emissions with a large focus on Buildings & Energy to improve energy efficiency and decarbonization. Many green building strategies can also increase resilience.

One reason to consider the vulnerabilities and adaptive capacities of buildings and energy at the same time is that Bellevue is growing fast and expects to add a significant number of new buildings to the city at a time when the local and regional economy is rapidly electrifying, as buildings transition from natural gas to electricity, local renewable energy production increases, and cars transition from gas to electric. System Planners at Puget Sound Energy expect that even accounting for greater energy efficiency, meeting the combined increase in electricity demand will require significant new infrastructure and/or system improvements (PSE 2023).

Local resources reviewed for this section include the following:

- [Bellevue Buildings and Energy programs](#)
- [Bellevue Environmental Performance Dashboard](#)
- [Energize Eastside Need and Solution](#)

ASSETS – BUILDINGS

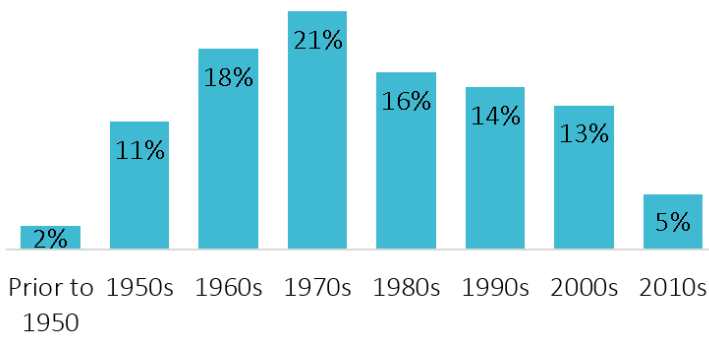
Bellevue is growing. Over the past several decades, the city has accommodated new residents and employees primarily in mixed-use centers such as Downtown and more recently BelRed. Table 5 shows the breakdown of commercial square feet and housing units within each neighborhood area in 2019. Since much of this growth occurred within the last 30 years, many of these buildings were constructed after Washington state incorporated energy codes in the state building code in 1986. Office square footage is predicted to grow. The city incentivizes LEED and BuiltGreen certification. Today, Bellevue has over 100 certified green buildings, including high rises in Downtown as well as schools and municipal facilities across the city (Table 6). Future investment in energy-efficient and green building construction will help Bellevue reach its climate goal of using 15% less energy, and 80% renewable per the Sustainable Bellevue: Environmental Stewardship Plan. Some energy conservation strategies can help building resilience such as designing for passive cooling in the case of power outages and extreme heat. During building weatherization, attention to indoor air quality as well as energy conservation is a best practice.

The greatest amount of recent residential growth has occurred within Downtown in mixed-use and high-rise residential construction, which has also been subject to more recent energy codes. Housing in single-family areas built prior to 1980 was more likely constructed under older standards (State Energy Code adopted in 1985). Over 50% of Bellevue’s housing stock was built prior to 1980 (American Community Survey [ACS] 2020), and a share of the homes likely need energy efficiency updates. Housing built prior to 1960 is expected to have lower adaptive capacity due to lack of modern elements that reduce climate exposure, such as air conditioning and modern ventilation. Neighborhoods with more homes built prior to 1960 are Lake Hills, Eastgate, and Newport. The City of Bellevue is working towards incentivizing property owners to update their homes to make them more energy efficient and resilient, through the installation of energy efficient heat pumps that include air conditioning.

TABLE 5 Commercial Square Feet and Housing Units by Neighborhood (2019)

Neighborhoods	Commercial Square Feet	Housing Units
BelRed	8,501,986	1,835
Bridle Trails	1,715,871	4,944
Cougar Mountain / Lakemont	232,106	4,184
Crossroads	1,786,601	6,651
Downtown	17,267,637	9,963
Eastgate	6,389,929	2,722
Factoria	2,901,091	1,405
Lake Hills	2,648,172	6,911
Newport	299,179	3,811
Northeast Bellevue	1,096,979	4,053
Northwest Bellevue	2,143,997	4,414
Somerset	306,066	2,906
West Bellevue	2,693,040	3,962
West Lake Sammamish	204,964	2,424
Wilburton	2,259,333	1,948
Woodridge	279,292	2,239
Total	50,726,243	64,372

SOURCE: City of Bellevue, BERK 2023



SOURCE: U.S. Census Bureau, 2015 American Community Survey

FIGURE 14 Housing Stock Age - Year of Construction (as of 2015)

TABLE 6 Buildings: Space by Sector

Sector	2019 Base Year Square Feet
Education	4,727,218
Food	2,206,951
Government	1,260,267
Industrial	3,896,804
Medical	2,985,105
Office	18,981,286
Other	1,144,448
Retail	5,595,326
Service	9,928,837
Total	50,726,243

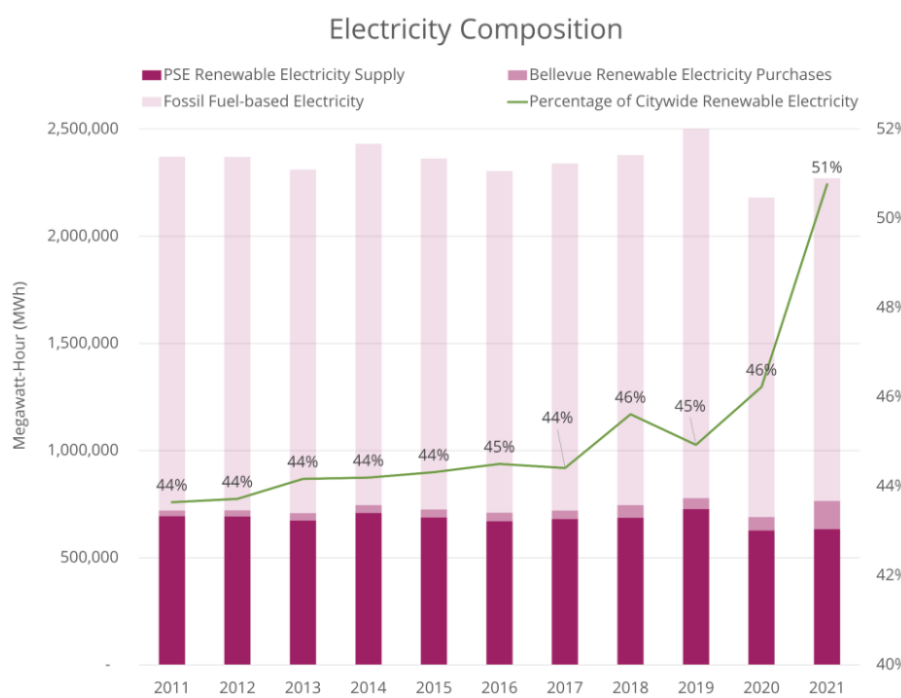
SOURCE: City of Bellevue, BERK 2023

ASSETS – ENERGY

Energy sources for Bellevue are hydroelectric, coal, natural gas, and renewable energy from wind and solar. The city is served by an investor-owned utility company, Puget Sound Energy (PSE), for both electricity and natural gas. The Sustainable Bellevue Plan has set a goal to transition to 100% renewable energy by 2050 ([Environmental Performance Dashboard](#)). To support this transition, the City of Bellevue participated in PSE’s Green Direct program, which built the first wind farm in Western Washington and the largest solar array in Washington State capable of supplying 350,000 MWh annually ([PSE Green Direct 2019](#)). The

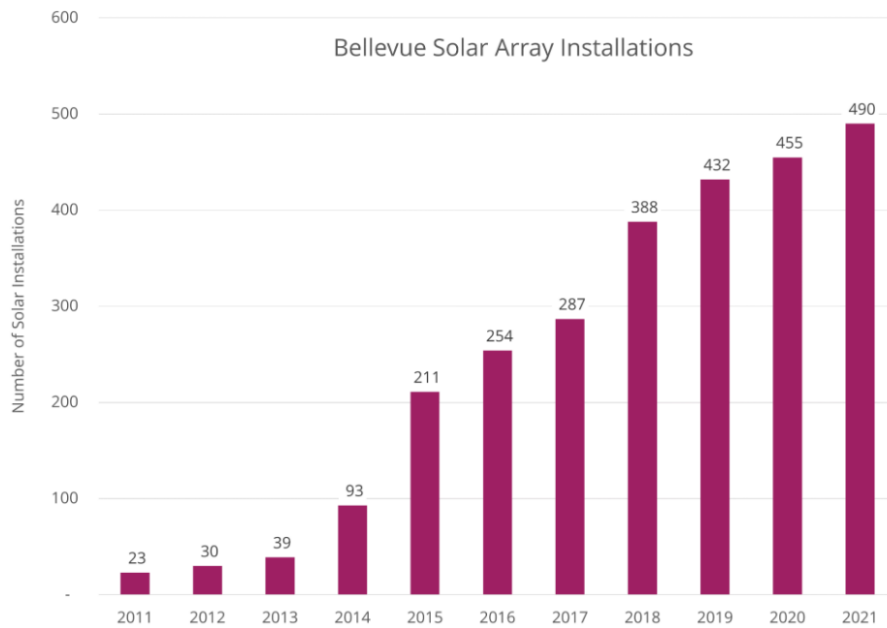
Washington State Clean Energy Transportation Act, passed in 2019, requires utilities to transition to 100% renewable energy by 2045. In response, PSE has established a [Pathway to Beyond Net Zero](#), which includes a commitment to being coal-free by 2025.

Figure 15 shows how the commercial and residential sectors have committed to purchasing renewable energy through PSE programs over the past 10 years to help accelerate the transition, with a large increase in 2021 when the PSE Green Direct Skookumchuck windfarm went live. The city has also launched Solarize Campaigns to support residential installations of rooftop solar panels to generate local, clean energy. Figure 16 shows the increase in solar array installations since 2011. The City of Bellevue continues to pursue State and Federal grants to incentivize and grow the city’s clean energy capacity. Local generation and diversification of renewable energy resources, between wind and solar, continues to be a priority as the city works towards the 100% renewable energy goal.



SOURCE: PSE 2020

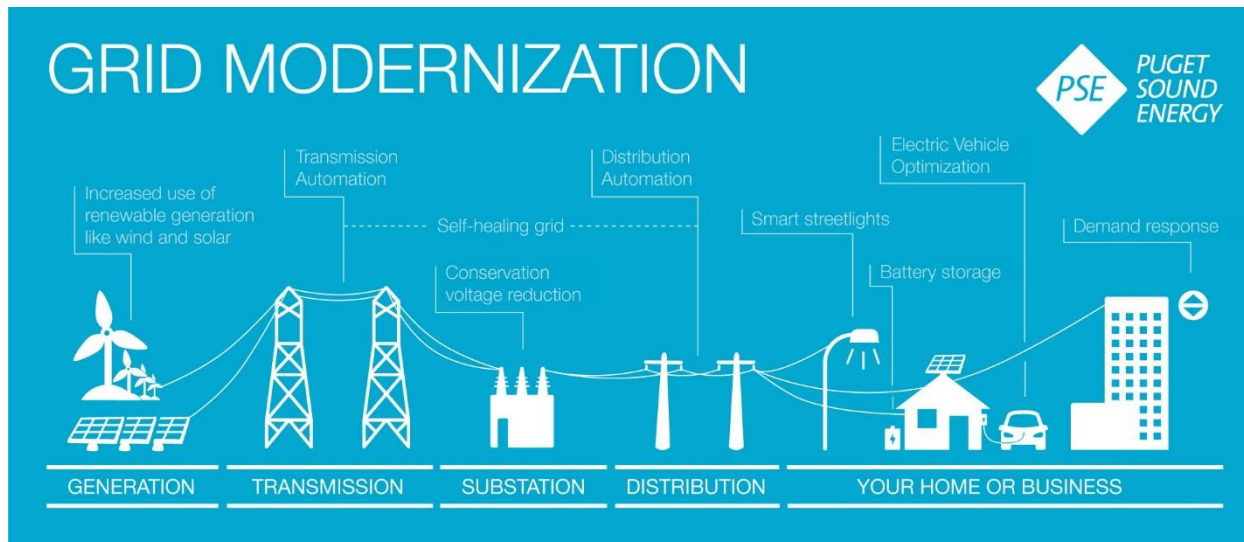
FIGURE 15 PSE and Bellevue Fossil Fuel and Renewable Electricity Purchases



SOURCE: Puget Sound Energy, Renewable Energy Product Management, 2021.

FIGURE 16 Bellevue Solar Array Installations

PSE has a holistic program to develop a resilient power grid involving activities such as renewable power, smart streetlights and electric vehicles, as well as actions that homeowners and business owners can take to build resilience (Figure 17). PSE is also implementing a number of strategies to increase the reliability of the grid and to plan for future growth in Bellevue and on the Eastside, through Energize Eastside and other projects. PSE reports on electric service reliability annually for their entire system, and specifically for the City of Bellevue ([Bellevue Electric Service Reliability Report for 2022](#)).



SOURCE: PSE 2020. <https://www.pse.com/en/pages/grid-modernization>

FIGURE 17 PSE and Resilient Power Grid

ASSETS – BUILDINGS, FLOODPLAINS, AND STORMWATER SYSTEMS

Approximately 2% of land in Bellevue is in a floodplain. This area includes numerous streams across the city but is concentrated on the eastern side of the city in the Lake Hills neighborhood (FEMA 2020; BERK 2023). Other areas in the city such as West Bellevue, Factoria, Somerset, Eastgate, and West Lake Sammamish are prone to flooding due to poor drainage. The drainage system is comprised of natural and engineered solutions. Bellevue provides real-time tracking of water levels in high flood areas. The City of Bellevue regulates development in flood hazard areas, requires stormwater management in all new development, and operates its stormwater system to enable storage, infiltration and safe conveyance of stormwater to reduce flooding and provide solutions for those who are impacted by it. Retaining and enhancing stream and floodplain functions including wetland and riparian protections are also addressed in critical area regulations to support surface and groundwater quality and wildlife habitat.

3.1.2 Potential Impacts

Climate change impacts could have far-reaching consequences on buildings and energy systems in Bellevue. Increased wildfires and smoke, droughts, heatwaves, and extreme storm events will exacerbate existing vulnerabilities and introduce new challenges. Bellevue could face the following climate-related risks to buildings and the energy system:

- Extreme temperatures and prolonged heatwaves can strain the electric grid, resulting in power failures like blackouts or brownouts. Extreme heat can damage critical grid infrastructure, such as transformers and electric lines, due to overheating which can cause wires to expand, sag, or even puncture their insulation. This increases the risk of short circuits and intensifies the threat of power failures. Greater

frequency and duration of power failures limits building operations, communication, health and safety, and security, which can lower economic productivity.

- Increased precipitation intensity and higher volumes of stormwater runoff from impervious surfaces can overwhelm drainage systems, leading to localized flooding in lower levels, basements, and parking garages of buildings. Flooding can damage property, critical infrastructure, disrupt daily operations, and pose safety risks to occupants, such as mold growth and structural deterioration in buildings.
- Increased intensity and frequency of extreme winter storm events, potentially including hailstorms and snowstorms, that can cause physical damage to buildings and energy infrastructure, potentially leading to extended power outages.
- Droughts sufficient to reduce water availability for hydropower generation which supplies 53% of electricity statewide ([WA State Fuel Mix Disclosure 2021](#)). Prolonged periods of drought combined with increased cooling demand can shift power supply to expensive fossil fuel-based generation, increasing electricity costs and resulting in higher greenhouse gas emissions.
- Drought impacts water reservoirs that supply potable water to populated areas, including water resources required to operate building cooling systems, especially during prolonged heatwaves. Reduced water supply could require accessing more distant alternative water reservoirs, which could lead to higher costs and increased energy.
- Wildfires may indirectly impact Bellevue's buildings or energy systems if the grid is damaged, but local risk is mostly confined to areas defined as Wildland-Urban Interface (WUI). Wildfire smoke and ash can reduce solar panel generation capacity both by making sunlight more diffuse and by physically obscuring the panels. This impact is expected to become more significant as the electric grid transitions to renewable energy sources and wildfires continue to increase in frequency and severity. Particulate matter from wildfires can also increase maintenance needed for building filtration systems; more frequent and prolonged wildfire seasons may require more advanced building filtration systems to protect indoor air quality for occupants.

Reducing the heat island effect and ensuring effective cooling measures during escalating summer temperatures is particularly important in neighborhoods such as Crossroads, Lake Hills, and Downtown, which were identified by the Climate Vulnerability Index as exhibiting heightened vulnerability due to higher concentration of vulnerable populations and lack of heat-reducing elements in the built environment. Effective cooling relies on structural insulation, the presence and capacity of mechanical and/or natural cooling systems, and other thermal properties that determine a building's ability to reflect or shed heat. The neighborhoods of Eastgate, Lake Hills, and Newport are also more vulnerable to extreme heat due to their higher concentrations of homes built prior to 1960.

Projected increases in extreme rainfall events may lead to more frequent and severe flooding that can cause property and structural damage. Extreme precipitation could enlarge floodplains, intensify stormwater runoff, and accelerate erosion. Elevated flooding risks and rising water tables could trigger below-grade flooding in basements, where housing furnaces and equipment is commonly located, and/or in parking garages, especially in the downtown area. Property in floodplains or areas with poor drainage would be more severely or frequently impacted, and new structures may be subject to damage that were not previously in defined flood hazard areas. Neighborhoods at higher risk of these impacts include the central area of Bellevue, West Bellevue, Woodridge, Lake Hills, and West Lake Sammamish.

3.1.3 Adaptive Capacity

Adaptive capacity in this sector is the ability of buildings and energy infrastructure to respond and adjust to changing conditions and requirements in a manner that is environmentally responsible and economically beneficial. It includes all characteristics that enable the building or energy system to maintain its functionality even as climate change impacts increase in frequency, severity, or both. The city's adaptive capacity may differ between and even within neighborhoods, depending on factors such as the natural environment or age of buildings and infrastructure.

The City of Bellevue can increase adaptive capacity by planning for more resilient development and by increasing the resilience of existing buildings and infrastructure. For future development, the City can start by reviewing its building and land use codes for opportunities to increase resilience. This is particularly important as the city continues its projected growth through the next decades in the face of worsening climate impacts. The City has several existing programs that bolster the adaptive capacity of the buildings and energy sector, which can be expanded to further increase climate resilience. These programs include:

- The City of Bellevue's permit under the National Pollutant Discharge Elimination System (NPDES), which requires that low-impact development be considered as the preferred method of stormwater management. Low-impact development includes features such as downspouts that flow into bioretention swales, planters, ponds, or raingardens that help slow the speed of runoff to promote groundwater infiltration (Buranen 2017).
- Building codes for stormwater management, which could be reviewed for alignment with projected increases in climate-related precipitation patterns and potential flooding impacts.
- [Clean Buildings Incentive Program](#): Assists commercial buildings over 50,000 ft² to comply with the Washington Clean Building Performance Standard. Brings together developers, property owners, and city government to implement energy efficiency measures that support climate resilience in the built environment.
- [Bellevue 2030 District](#): A public-private partnership that works with commercial building owners, businesses / tenants, and the city to support energy and water efficiency, transportation emissions reduction, and waste and stormwater.
- [Energy Smart Eastside Heat Pump Campaign](#): Bellevue has partnered with Issaquah, Kirkland, Mercer Island, and Redmond to expand awareness of and access to heat pumps for residents of all five Eastside cities. This supports resilience by replacing fossil fuels with electricity in home energy systems, while also reducing overall energy use and providing air conditioning, which is becoming increasingly necessary during high heat days and smoke events.
- [Green Building Incentives](#): The City of Bellevue offers incentives for certified green buildings such as LEED, Built Green, Living Building, and Passive House in designated neighborhoods, including Downtown, BelRed, and East Main subareas. Green Building incentives can increase adaptive capacity both by making buildings more resilient to climate change impacts and by reducing energy demand.

3.1.4 Vulnerability Summary

Buildings and energy systems are directly and indirectly vulnerable to climate change impacts in Bellevue. Wildfires can damage energy infrastructure, which could disrupt service and cause power outages. Excessive smoke and ash can degrade building filtration systems and reduce indoor air quality. Prolonged drought could strain water resources for hydropower generation and impact building cooling systems and daily operations. Frequent or prolonged heatwaves can strain cooling systems and grid capacity by further increasing energy demand during peak demand periods. More frequent or intense storm events can physically damage buildings and power infrastructure.

Impacts to buildings and energy systems are expected to be unevenly distributed throughout the city. Certain neighborhoods may be less resilient to heatwaves because they have a higher percentage of older buildings, or older infrastructure (Eastgate, Lake Hills, and Newport), or due to more severe urban heat island effect (Crossroads, Lake Hills, and Downtown) and/or larger vulnerable populations. Wildfire danger is considered low throughout Bellevue, except where it is moderately low (parts of Bridle Trails, Newport Hills, Somerset/Hilltop, and Cougar Mountain/Lakemont) due to a higher concentration of homes in the Wildland-Urban Interface.

Table 7 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Buildings & Energy sector in Bellevue.

TABLE 7 Buildings & Energy: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High (Energy) Moderate (Buildings)	Moderate	Moderate-High (Energy) Moderate (Buildings)	Energy supply may be impacted during extreme heat events, and certain neighborhoods in the city are projected to experience heightened impact of extreme heat. Buildings and energy infrastructure may be damaged or destroyed by extreme weather events.
Extreme Precipitation/ Flooding	Moderate	Low-Moderate	Moderate	Energy systems and buildings are at risk of physical impacts due to extreme precipitation events. Properties and energy infrastructure located in floodplains are more at risk.
Stream Temperature	N/A	N/A	N/A	No significant impacts projected.

Drought	Moderate	Moderate	Moderate	Hydroelectric energy systems will be impacted by low streamflow during drought. Installation of solar panels and other energy diversification programs can increase the adaptive capacity of buildings and energy systems during drought events.
Wildfire and Wildfire Smoke	Low	Moderate	Low	Particulate from smoke can reduce solar energy generation, which could be of increasing concern as the grid shifts to renewable energy sources. Smoke impacts may also increase need for costly air filtration systems. Direct damage from wildfire may temporarily reduce electricity generation capacity. Some areas of Bellevue have elevated wildfire risk, particularly where homes are built in or near the WUI.

SOURCE: BERK 2023

3.2 Cultural Resources & Practices

3.2.1 Sector Overview

This section examines the projected impacts of climate change on Bellevue’s cultural and historic resources and practices. These include cultural landscapes and heritage sites, culturally significant natural resources and species, significant structures such as historic buildings and public art, and community cultural events and gathering spaces. Properties and spaces falling within this sector include both public and private parks and outdoor venues, libraries and educational facilities, and cultural and arts centers. Projected climate change impacts of concern include increased stream temperatures, increased extreme precipitation and associated flooding events, and increases in extreme heat events.

Local resources reviewed for this section include the following:

- [Bellevue Map Viewer of heritage sites, historic buildings, and environmental layers \(e.g. floodplains, steep slopes\)](#)

3.2.2 Potential Impacts

SIGNIFICANT STRUCTURES

- Exposure to extreme heat, extreme precipitation, and increased storm intensity may accelerate the degradation of historic structures (Sesana et al. 2021).

- Extreme precipitation events may lead to increased risk of landslides (Handwerger et al. 2022), which could damage historically significant structures located in areas susceptible to landslides, including the Burrows Cabin and the Calvert House.
- Heat, flooding, and landslides, among other impacts, may damage public art installations, though sensitivity will vary by installation.

CULTURAL LANDSCAPES AND NATURAL RESOURCES

- Mercer Slough and Larsen Lake Farm are managed by the City of Bellevue as berry farms to preserve the area's agricultural heritage. Potential climate change impacts to the operations of these farms include flooding, crop damage due to extreme heat, increased irrigation requirements during periods of drought (Schreiber 2016), and increased hazard to u-pick visitors and operating staff due to increased incidence of extreme heat and poor air quality from wildfires in the greater region (Kearl and Vogel 2023; UW CIG et al. 2018).
- Bellevue Botanical Garden is managed by the City of Bellevue and faces exposure to climate change impacts such as drought and extreme heat, which will have operational implications for the gardens such as increased plant mortality, increased competition from invasive species and pests, and increased need for irrigation. Additionally, the Botanical Garden contains areas that may be susceptible to landslides during extreme precipitation events, creating a hazard for users and an operational challenge for resource managers.
- Ecosystem health is intractably connected to human and cultural health in Native American worldviews (UW CIG et al. 2018). Further damage or degradation of natural areas that exist within Bellevue threatens this already diminished aspect of cultural well-being for Indigenous individuals residing in and originating from the area. This includes rising stress on Chinook, coho, and sockeye salmon due to increased water temperatures, more severe winter streamflow, increased pollutant concentration in waterways, decreased water levels in summer and fall, and other ecological shifts (WDFW 2022).
- Community garden spaces and the P-Patch program are likely to experience a variety of climate change impacts. The primary impact will be increased heat with those working in gardens more exposed to higher temperatures and crops experiencing increased stress due to increasing air temperatures (Bisbis et al. 2018; UW CIG et al. 2018).
- Assets such as urban parks and the urban tree canopy support Bellevue's cultural identity as embodied in their motto: "A City in a Park." Increases in extreme heat events, drought, and rising temperatures will all negatively impact these assets through increasing tree mortality (COB and UW 2019) and susceptibility to infestation (Raymond et al. 2014).

CULTURAL AND COMMUNITY CENTERS AND EVENTS

- Several cultural and/or community centers in Bellevue may be exposed to climate change risks owing to their proximity to the wildland-urban interface (WUI), steep slopes, or floodplain hazards. The sensitivity of individual structures is determined by site characteristics and the elements of each structure exposed and thus varies accordingly.

- Bellevue is host to many multicultural celebrations and events. Depending on circumstances, these events may be vulnerable to climate change impacts. Events held outside or in venues with exposure to climate change impacts may be affected by poor air quality, extreme heat events, floods, or landslides.
- Climate change impacts to the transportation system may cause difficulties in accessing resources for individuals who live long distances from these centers or who rely on transit and active transportation or those who require mobility devices.

3.2.3 Adaptive Capacity

- Adapting cultural resources to climate change impacts can be challenging because many are unique, irreplaceable, and location based.
- Due to their historic nature and the associated limitations on structural adaptation, some historic structures have very constrained adaptative capacity. Non-historic significant structures may be possible to move or armor against impacts without compromising their cultural function.
- Bellevue has invested in creating culturally responsive governance structures: e.g. creation of the Diversity Advantage Team (staff within City Manager's Office), Bellevue's Diversity Advisory Network (community members appointed by City Manager), Neighborhood Liaisons within the Community Development Department, and its Communities of Color Coordinating Team.
- Community owned and operated cultural resources may experience difficulties in adapting to climate change due to factors including a lack of knowledge about effectiveness resilience strategies and/or insufficient resources.
- Adaptive capacity of certain natural resources such as the Botanical Gardens and farms operated by the City of Bellevue may be limited by conflicts between resource needs and climate resilience policies surrounding water use during periods of drought. Future-focused planning and management of agricultural areas or botanical gardens can focus on species, management approaches, and technologies that support continued operations even in changing conditions.
- Salmon populations in the Salish Sea are already threatened by human disturbances to the environment. Compounding exposures from climate change complicate salmon recovery efforts, although many organizations and governments are aligned in their efforts to support and restore these populations.

3.2.4 Vulnerability Summary

While the vulnerability of cultural resources and practices to climate change varies by resource, overall vulnerability is moderate to high. This is due to the large role natural systems and resources play in the cultural environment, history, and identity of Bellevue. Salmon populations in particular present a substantial challenge. Similar levels of vulnerability can be seen in certain historic resources such as the Burrows Cabin and the Larsen Lake Farm. Conversely, many modern cultural resources have low to moderate vulnerability to climate change impacts due to low exposure and sensitivity as well as higher adaptive capacity, given updated building codes and regulations, compared to their historical counterparts.

Table 8 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Cultural Resources & Practices sector in Bellevue.

TABLE 8 Cultural Resources & Practices: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	Moderate-High	Moderate-High	Moderate	Degradation of structures; drought or heat damage to natural landscapes and species of cultural and/or historic significance.
Extreme Precipitation/ Flooding	Moderate-High	Moderate	Moderate-High	Flooding, erosion, and landslides could damage structures, public art or cultural venues, and natural landscapes and species of cultural and/or historic significance.
Stream Temperature	High	Moderate	High	Increased pressure on culturally important stream and near-shore species, including but not limited to salmon.
Drought	Low-Moderate	Moderate	Low-Moderate	Water stress on culturally important plant species, as well as places of natural historic or cultural meaning such as Mercer Slough or the Botanical Gardens.
Wildfire Smoke	Moderate-High	Moderate-High	Moderate	Potential to reduce the viability of outdoor gathering or event spaces and cultural events that take place during summer; increased stress on animal and plant species.

SOURCE: ESA 2023

3.3 Economic Development

3.3.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for Economic Development in Bellevue. Bellevue is the second largest job center in Washington with an emphasis on information technology (City of Bellevue Community Development 2020b). It has a low unemployment rate, and a large proportion of its residents are highly educated. Recently, jobs in the information, tourism, health and fitness, construction, retail, and services sectors have grown in Bellevue, while jobs in manufacturing have declined, following a long-term trend given redevelopment of industrial areas to office and mixed uses (e.g. in BelRed).

Climate impacts, including extreme heat, extreme precipitation, wildfire smoke, and other events, can affect Bellevue's economy by disrupting business continuity by increasing insurance costs, disrupting supply chains, altering the timing and rate of construction, increasing infrastructure costs, and disrupting other aspects of the economy. Responding to climate change can also present economic opportunities through increased demand for environmentally responsible products and services, greater investment in green and low carbon technologies, improved local production and supply, and increased investment in and valuation of areas with lower climate risks.

Local resources reviewed for this section include the following:

- [Bellevue Community Profiles 2016-2020 ACS](#) (Puget Sound Regional Council [PSRC] 2022)
- [Bellevue Economic Development Plan](#) (City of Bellevue Community Development 2020b)
- [Bellevue Environmental Stewardship Plan](#) (City of Bellevue Community Development 2020a)

ASSETS – ECONOMIC DEVELOPMENT

Bellevue is a major job center for the region and state, with over 11% of all jobs in King County and almost 5% of all jobs statewide.⁷ According to City of Bellevue data, the city had a total of 50.1 million square feet of employment space and a total of about 137,700 jobs in 2019 (Table 9).

⁷ According to US Census data, Bellevue had 157,810 jobs in 2019, which is 11.4% of jobs in King County and 4.8% of jobs in Washington State. Exact jobs estimates vary by source – see Table 9 for City of Bellevue estimates based on Neighborhood Employment Space.

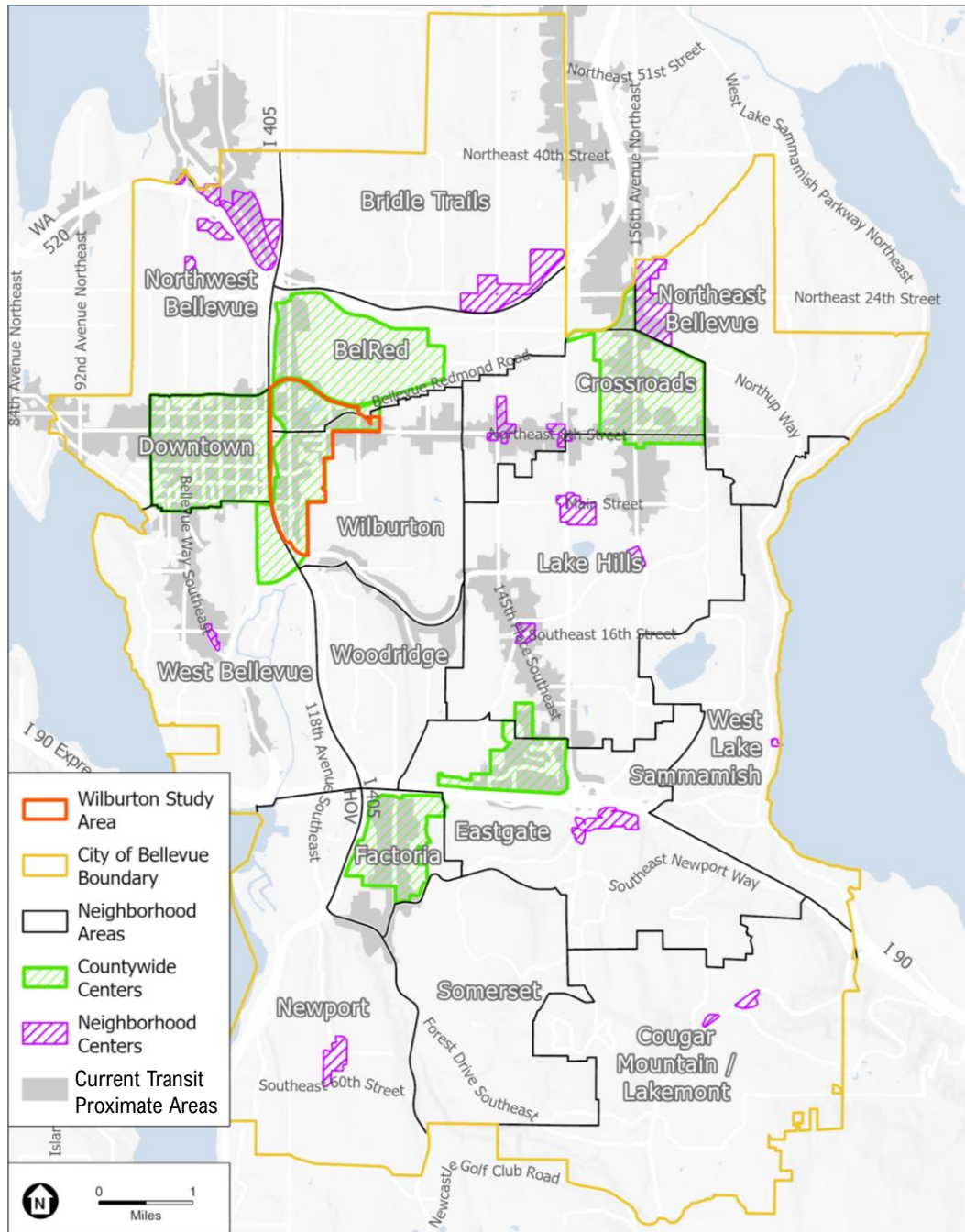
TABLE 9 Employment Space by Neighborhood

Neighborhoods	Square Feet	Jobs
Downtown	17,267,637	59,865
BelRed	8,501,986	18,796
Eastgate	6,389,929	17,054
Factoria	2,901,091	8,879
Wilburton	2,259,333	6,455
West Bellevue	2,693,040	5,112
Lake Hills	2,648,172	4,961
Northwest Bellevue	2,143,997	4,942
Crossroads	1,786,601	3,859
Bridle Trails	1,715,871	3,772
Northeast Bellevue	1,096,979	2,146
Newport	299,179	583
Cougar Mountain / Lakemont	232,106	432
Woodridge	279,292	332
Somerset	306,066	310
West Lake Sammamish	204,964	222
Total	50,726,243	137,722

SOURCE: City of Bellevue 2023

About 4.1% of those jobs potentially require working outdoors (e.g. construction, maintenance, emergency response), which is associated with higher sensitivity to climate change impacts, especially extreme heat events. Bellevue has a comparatively high share of residents with office jobs, and fewer production and construction jobs (Figure 19).

Currently, most jobs and office buildings are in Downtown, BelRed, and Eastgate neighborhoods. Within these neighborhoods, the City of Bellevue has identified neighborhood centers in its Comprehensive Plan; these centers are areas of focus for jobs, housing, and shopping (Figure 18). Economic development efforts are expected to be concentrated in these two areas (existing centers and neighborhood growth areas identified in the Comp Plan), and therefore actions to reduce vulnerability and increase adaptive capacity are likely to also be concentrated in these areas.



SOURCE: City of Bellevue, BERK 2023

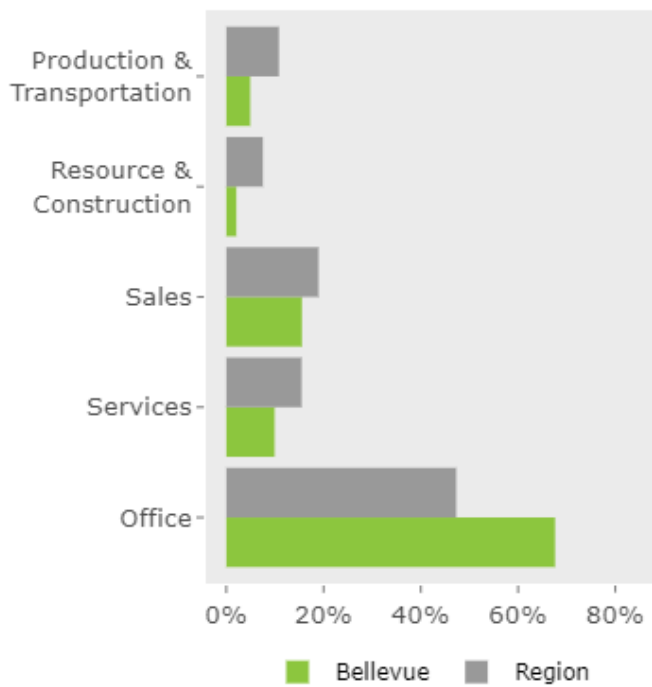
FIGURE 18 Neighborhood Centers

TABLE 10 Employment Space by Sector

Sector	Square Feet
Office	18,981,286

Sector	Square Feet
Service	9,928,837
Retail	5,595,326
Education	4,727,218
Industrial	3,896,804
Medical	2,985,105
Food	2,206,951
Government	1,260,267
Other	1,144,448
Total	50,726,242

SOURCE: City of Bellevue 2023



SOURCE: PSRC 2022

FIGURE 19 Occupation of Bellevue Residents (2020)

3.3.2 Potential Impacts

Economic development is expected to experience the greatest vulnerability to disruptions and direct damage caused by increases in extreme heat and extreme precipitation events. Smoke from wildfires is also an impact of potential concern for outdoor summer activities and tourism.

- Climate-related extreme weather events may lead to business disruptions and closures due to their impacts to customers and/or employees. Extreme heat, extreme precipitation and flooding, and wildfire smoke all have the potential to disrupt economic activity for the duration of the event, particularly for business that operate outdoors and/or have a large contingent of outdoor workers. For example, during the extreme 2021 Heat Dome event, the region saw retail and restaurant business closures, and restrictions on recreation and outdoor work, as well as an abrupt increase in demand for indoor spaces with air conditioning, such as hotel rooms. (McNerthney 2021). During extreme weather events, office workers may elect to work from home, impacting local retail businesses and activity; however, many older homes in this region do not have air conditioning, so workers may also elect to work from air-conditioned offices or local shops.
- Insurance premiums and coverage rates, and mortgage interest rates could increase for properties at greater risk of exposure to climate hazards. Conversely, rates may be lowered in areas with lower risk or that are actively acting to reduce risk. Washington State's Office of the Insurance Commissioner has coordinated with other national efforts to address future risks (Office of the Insurance Commissioner n.d.).
- Extreme precipitation events are anticipated to increase citywide, with the potential to damage infrastructure that businesses depend on through flooding and erosion. Neighborhood areas with smaller employment, such as West Bellevue and Lake Hills, have higher percentages of properties in the floodplain or in flooding hotspots. The intensity and frequency of storms could affect roads, stormwater systems, and result in greater costs to businesses.
- Increased polarization in storm systems may exacerbate current conditions related to groundwater infiltration. If rain falls primarily in large storms that exceed absorption rates of existing wetlands and other infiltration sites, a greater proportion of annual precipitation will be lost as runoff. This may result in declining streamflow, as described above, but also has an important secondary impact of decreasing aquifer reserves, which can negatively affect recreation opportunities.
- Shifts in tourism dollars from jurisdictions losing recreational opportunities to jurisdictions gaining opportunities. Tourism is a sector of focus in the Economic Development Plan, and the City of Bellevue desires to increase the number of conventions, performances, and special events as well as increase dining and bars, lodging, and arts/culture/recreation (City of Bellevue Community Development 2020b). Outdoor recreation could be limited during climate events such as extreme heat, extreme precipitation, or wildfire smoke, but recreation could be increased indoors where temperatures are controlled, such as at the Meydenbauer Center, which hosts indoor events. In addition, it is possible that Bellevue could experience an influx of tourists seeking to avoid more severe weather conditions in other regions (or countries), especially in the summer.

Based on the combination of exposure, sensitivity, and adaptive capacity, employment centers with greater vulnerability and population density include Crossroads, Downtown, and Factoria. Other employment centers, such as BelRed, Eastgate, and Wilburton, have high or medium high exposure, but currently have low population densities; however, these are locations where the City of Bellevue is anticipated to add more mixed-use growth (Table 11). In both existing and new centers, implementation of climate adaptation strategies would increase resilience.

TABLE 11 Top 5 Neighborhoods with Employment and Climate Vulnerability

Center	Exposure*	Sensitivity*	Adaptive Capacity*	Vulnerability Index: Center Areas	Vulnerability Index with Population: Center Areas
BelRed	Heat island, Air Quality, Floodplain (Moderate)	Age (Under 5, percentage of total)	Public Facility Access, Parks Access, Tree Canopy, Impervious, Single Householders, Poverty, BIPOC	Moderate-High	Higher Vulnerability / Lower Pop. Density
Crossroads	Heat Island, Air Quality	Age (65+, Under 5, percentage of total), Health	Health Insurance, Unemployment, Tree Canopy, Impervious, Affordable Housing, Cost Burden, Poverty, BIPOC	Higher (east)	Higher Vulnerability / Higher Pop. Density (east and west)
				Moderate-Low (central)	
				Moderate-High (west)	Low/Moderate Vulnerability/Higher Vulnerability (central)
Downtown	Urban Heat Island, Air Quality	Age (over 65) (Moderate)	Impervious, Tree Canopy, Impervious, Cost Burden, Single Householders, Linguistic Isolation	Moderate-High/High (northwest, southeast)	Partial: Higher Vulnerability / Higher Pop. Density
				Medium (north and southwest)	Partial: Moderate Vulnerability / Higher Pop. Density
				Medium Low (southwest)	
Eastgate	Air Quality	Age (Under 5), Health	Public Facility Access, Affordable Housing, Housing Quality (Year)	Lower	Higher Vulnerability / Lower Pop. Density
Factoria	Heat (Moderate), Air Quality, Flooding hotspots (Moderate)	Health	Parks Access, Low Educational Attainment	Higher	Higher Vulnerability / Moderate Pop. Density
Wilburton	Flooding (Moderate), Heat (Moderate),	Water Quality (Moderate), Health (Moderate)	Transit, Poverty, BIPOC	Moderate- High (north and southwest)	Partial: Higher Vulnerability / Lower Pop. Density

Center	Exposure*	Sensitivity*	Adaptive Capacity*	Vulnerability Index: Center Areas	Vulnerability Index with Population: Center Areas
	Air Quality (Moderate)			Moderate (center)	Partial: Lower Vulnerability / Lower Pop. Density

*Higher unless stated

3.3.3 Adaptive Capacity

Adaptive capacity for Economic Development is the ability of the city’s economy and workforce to withstand and recover from climate impacts in ways that are equitable and support workers. To increase the resiliency and adaptive capacity of its economy, the Environment Stewardship Initiative plan includes the following performance indicators related to economic development:

- Sustainable Bellevue Key Performance Indicator: Jobs located within 1/4 mile of a frequent transit stop (percent of jobs): 75% short term and 85% long term.
- Sustainable Bellevue Strategy E.2.1: Commercial energy efficiency. Provide technical assistance for commercial energy benchmarking and retrofits for large buildings to support compliance with the statewide program and leverage early adoption incentives.

The city can further increase the adaptive capacity of its economy by implementing policies that assist businesses and workers in recovering from climate disasters, as well as by implementing measures that minimize the impacts of climate events to economic development.

Building efficiency retrofits and resiliency measures described in section 3.1.3 of this report can increase adaptive capacity by improving the ability of infrastructure to withstand extreme heat and precipitation events, thereby decreasing the negative economic impact of those events.

The city can also identify and support shifts in business opportunities driven by demand for goods and services that promote sustainability and climate resilience. Business opportunities in renewable energy and low carbon technologies are expected to grow with increased action in response to climate change. While the Economic Development Plan does not reference green technology directly, it calls for facilitating and encouraging desirable business investment and small businesses. Supporting green technology could help accomplish this. The Environmental Stewardship Plan notes:

All three of these elements—economic competitiveness, social vibrancy, and environmental stewardship—are needed to protect human health and quality of life, support well-paying green jobs, sustain a healthy environment, and generate long-term cost savings and resilience to economic and environmental challenges. (City of Bellevue Community Development 2020a)

The City of Bellevue has also set an equity priority for city programs, practices, and decision making, including its sustainability program: “Does the proposed action support communities of color and low-income

populations through workforce development, contracting opportunities, or the increased diversity of city staff?" As low-income and BIPOC workers experience a lower baseline adaptive capacity to climate impacts, the city can increase the adaptive capacity of its economic sector by implementing programs that center justice and equity.

3.3.4 Vulnerability Summary

Disruptions to business continuity and economic activities in Bellevue are likely in a changing climate. These impacts may be felt more acutely in specific neighborhoods and employment centers, which affects both residents and commuters to the city. In addition, economic vitality associated with tourism and cultural events that are held outdoors could be impacted by extreme heat, wildfire smoke, and sites could be damaged by drought and extreme precipitation; indoor recreation and cultural venues could alternatively see more demand as a result. The ability of this sector to prepare for and adapt to climate change depends on impacts to and adaptation measures enacted for other sectors, such as transportation, ecosystems, and land use and development.

Table 12 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for economic development in Bellevue.

TABLE 12 Economic Development: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High	Moderate	High	Impacts to infrastructure critical to business operations; direct impacts to outdoor workers during summer/fall; potential impacts to viability of outdoor-dependent businesses.
Extreme Precipitation/ Flooding	Moderate	Low-Moderate	Moderate	Impacts to infrastructure critical to business operations; potential impacts to viability of outdoor-dependent businesses.
Stream Temperature	N/A	N/A	N/A	No significant impacts anticipated.
Drought	Moderate	Moderate	Moderate	Sites could be damaged by drought, potentially impacting economic vitality associated with tourism and cultural events that are held outdoors
Wildfire Smoke	High	Moderate	High	Disruption of economic activity for the duration of smoke events, especially outdoor work and tourism.

SOURCE: BERK 2023

3.4 Ecosystems

3.4.1 Sector Overview

This section examines the projected impacts of climate change on Bellevue’s ecosystems and natural features, which include urban forests, parks, open spaces, biodiversity, and ecosystem services. The city has almost 2,000 acres of parks and public Native Growth Protection Area (NGPA), which encompasses stream corridors, wetlands, forests, and habitat for a variety of terrestrial and aquatic species. Bellevue is known as a “City in a Park” and has strong community values around the natural environment, access to open space, and beautiful natural areas.

Ecosystem features and resources within Bellevue are varied, including 79 miles of streams within the city limits, approximately thirteen miles of large-lake shoreline, three small lakes, 650 acres of open space and gardens, and an urban tree canopy that covers 39% of land area (2019 Tree Canopy Assessment). These natural resources provide habitat for wildlife, and support critical ecosystem services, including water management and erosion control, and benefits to human health and wellbeing. Impacts on habitats and species affect the quality and supply of ecosystem services.

Bellevue’s Parks and Community Services Department manages the city’s street trees and arterial landscapes in designated areas. The department works to protect and enhance wildlife habitat, water quality, and forest conditions, and manages 92 miles of multi-use trails.

Projected climate change impacts of concern for ecosystems include increases to annual average air temperatures, increased average stream temperatures, increases in heavy rainfall and extreme precipitation events, increased frequency and extent of flood events, more prolonged and intense periods of drought, and an increased risk of wildfires and wildfire smoke.

Local resources reviewed for this section include the following:

- [City of Bellevue Comprehensive Plan —Environment](#) and [Parks, Recreation, and Open Space](#) Chapters (City of Bellevue Community Development 2015)
- [Bellevue Parks & Open Space System Plan](#) (City of Bellevue Parks & Community Services 2022)
- [2019 Urban Tree Canopy Assessment](#) (Plan-It Geo LLC 2021)

3.4.2 Potential Impacts

Bellevue’s ecosystems are projected to be highly vulnerable to extreme heat and higher stream temperatures, and more moderately vulnerable to extreme precipitation events and flooding. Wildfires are expected to have a significant direct impact in wildland areas outside the city, but not within the city.

- Increasing air temperature, combined with decreasing summer precipitation, is projected to decrease the species range for native birds such as the bald eagle, black oystercatcher, western grebe, trumpeter swan, and others (Mauger et al. 2015).

- Changes to temperature patterns over the course of a year are likely to impact the onset of spring conditions. These shifts will impact food availability for species, creating mismatches with established migratory and reproductive timings diminishing survival rates and reproductive success.
- Some native species (such as Douglas fir) require sufficiently low winter temperatures to be reached before they begin spring growth cycles. Higher winter temperatures could threaten the health or survival of such species (Mauger et al. 2015).
- Higher temperatures and increased incidence of extreme heat are likely to increase resident demand for access to shaded natural areas and recreational facilities with water access. This will likely contribute to increased use of parks and open spaces, which will both place additional burden on ecological systems and habitats, and potentially expose residents to hazards such as algal blooms (Mauger et al. 2015).
- Increased air temperature and extreme heat events may cause stress for species of local importance such as the Oregon Spotted Frog and other amphibians. These species are also expected to be impacted by changes in precipitation patterns and projected decline in wetland habitat (Mauger et al. 2015; WDFW 2015).
- Higher temperatures and increased incidence of extreme heat are likely to increase resident demand for access to shaded natural areas and recreational facilities with water access. This will likely contribute to increased use of parks and open spaces, which will both place additional burden on ecological systems and habitats, and potentially expose residents to hazards such as algal blooms (Mauger et al. 2015).
- Increased air temperature and extreme heat events may cause stress for species of local importance such as the Oregon Spotted Frog and other amphibians. These species are also expected to be impacted by changes in precipitation patterns and projected decline in wetland habitat (Mauger et al. 2015; WDFW 2015).
- Some invasive species and pests benefit from changing climatic conditions. Changing environmental conditions and increasing stress to host species and natives will give a competitive edge to nonnative and invasive species that may experience expansion in their ranges or be more adaptable to changes (e.g. extreme heat events may result in excessive tree mortality and increased spread and impacts of invasive species such as bark beetles).
- Extreme precipitation events, changes to precipitation patterns, and increased intensity of storms are likely to alter streamflow patterns and increase the volume of flows in streams and rivers, particularly those receiving stormwater runoff, during rainfall events. These heightened flows may increase erosion of stream banks and scouring around developed areas. Riparian corridors that have been degraded by urbanization and development are more susceptible to erosion and instability (May et al. 1998). Erosion of banks can also be exacerbated by degradation of vegetation, which is likely due to forecasted increases in drought conditions (Mauger et al. 2015).
- As precipitation events are forecast to become more polarized in nature (bigger storms are more intense, smaller storms are lessened), runoff that originates in developed and impervious areas is likely to increase. This can mean an increase in pollutant transport into waterways and decreased groundwater infiltration (Lake Sammamish Watershed Assessment).

- More intense precipitation events may lead to higher incidence of landslide events. Many parks and open spaces, including Weowna Park and Woodridge Open Space, contain steep slopes vulnerable to landslides. Should landslides occur in these areas, there may be damage to trail networks, which would reduce access for residents and increase maintenance demand.
- Many Bellevue parks and open space areas are susceptible to flooding, including the Lake Hills Greenbelt, Richards Creek Open Space, and Kelsey Creek Park. While some open spaces may be designed to accommodate flooding and may even play a role in mitigating the impacts of high streamflow, others may experience damage to trail networks and other recreational facilities because of increased flood exposure. This can damage habitat for wildlife and increase maintenance burdens, potentially reducing access to these spaces by residents.
- Urban flooding impacts resulting from intense precipitation events will likely occur more often in drainage basins with higher percentages of their land covered with impervious surfaces. This runoff negatively impacts water quality, habitat, and aquatic/amphibious species.
- Increased polarization in storm systems may exacerbate current conditions related to groundwater infiltration. If rain falls primarily in large storms that exceed absorption rates of existing wetlands and other infiltration sites, a greater proportion of annual precipitation will be lost as runoff. This may result in declining streamflow, as described above, but also has an important secondary impact of decreasing aquifer reserves, which can negatively affect wildlife.
- Increased occurrence of events such as landslides, flooding, or especially intense storms may create a need for additional resources for cleanup and/or restoration projects.
- More intense streamflow events due to increased precipitation, increased runoff, and decreased groundwater infiltration may increase erosion and sediment transport while decreasing dissolved oxygen levels having the overall effect of lowering water quality for aquatic species (CIG 2009).
- Warming of lakes may alter the timing of critical biological events such as the spring plankton bloom, which is tied to the onset of thermal stratification. This may alter predator-prey interactions or cause the decline of certain species such as *Daphnia pulicaria*, a keystone herbivore whose peak abundance has not shifted to match phytoplankton availability (Mauger et al. 2015).
- Warming lake temperatures will likely stress native kokanee fish in Lake Sammamish as waters become more stratified. These coldwater fish thrive within a narrow band of suitable temperature and dissolved oxygen conditions. During summers, these waters become too warm and dissolved oxygen levels drop, creating physiological stress on kokanee and other species. As lake temperatures rise with climate change, the suitable temperature-dissolved oxygen band will be severely limited or eliminated (King County 2013).
- Warm stream temperatures (influenced by ambient temperatures and streamflow rates) can affect adult salmon spawning and migration, by lowering availability of dissolved oxygen and increasing heat stress and competition from less heat-sensitive species. Warmer stream temperatures may be harmful to native vegetation in riparian areas, as well as aquatic vegetation, which could enable growth of invasive species that are harmful for riparian and aquatic habitat. These conditions may become more common as annual average air temperatures increase and precipitation patterns become more polarized.

- Soil moisture is expected to decrease during summer months and extended periods of drought. Decreased soil moisture means lower vegetation moisture, which increases stress on trees and plants, as well as diminishing the cooling effects of vegetation on the surrounding environment.
- Drought could deplete water availability in tributaries, especially in basins with high amounts of impervious surface and streams that are piped for long extents. Dry streambeds reduce the availability of fish spawning habitat.
- Drought and extreme heat-related declines in the groundwater stores that replenish streams in Bellevue will diminish streamflow, degrading habitat conditions through stagnation and warming. This can potentially lead to ecosystem failure if historically annual streams become seasonal as a result of depleted groundwater.
- Declines in groundwater availability may also drive increased demand for irrigation, particularly in settings that are less drought tolerant such as sports fields and agricultural uses. This can result in conflicts over water use between ecosystem needs and other uses when demand exceeds supply (typically in summer and early fall).
- Lower water availability and increased demand during periods of drought may diminish water levels in Bellevue's lakes. Declining water levels will diminish recreational value and contribute to warmer water temperatures, which may cause increases in hazardous algal blooms and harm cool-water aquatic species.
- Drier conditions due to drought, increased temperatures, and extreme heat events may increase the risk of wildfires occurring in large open spaces and urban forests. These fires may originate in these areas as a result of human activity (e.g. grills, cigarette butts, fireworks, electricity transmission infrastructure, etc.) or result from the spread of fire that originated in adjacent developed areas.
- Increased frequency of high fire danger days, drier fuels, and other climate variables are expected to increase fire risk in urban forests and in the wildland-urban interface. Increased wildfire is expected to cause disturbance to, and in the case of severe fires, alter regional ecosystems (CIG 2009).
- All of these impacts and stressors on wildlife and habitat may reduce the availability or efficacy of critical ecosystem services, including water management and erosion control, pollination, soil nutrient transport, and direct benefits to human health and wellbeing.

3.4.3 Adaptive Capacity

Adaptive capacity for ecosystems is the ability of Bellevue's ecosystems and natural features to withstand projected changes in the climate system and recover from climate shocks. To some extent, the adaptive capacity of ecosystems is determined by the qualities and features of the ecosystem itself—including the evolutionarily-determined attributes that may make a species more resilient or susceptible to climate extremes, and the capacity of an ecosystem as a whole to recover from species extinction. Many of the major limits to the adaptive capacity of ecosystems exist at regional, evolutionary, and planetary scales, and cannot be influenced by local policies alone; however, the City of Bellevue can continue to implement programs that support the resiliency of ecosystems and increase adaptive capacity of the ecosystem sector.

- Bellevue's Shoreline Master Program (SMP) establishes goals of maintaining shoreline ecological function, facilitating improvement of degraded conditions, and ensuring no net loss of ecosystem

function. By incorporating projected climate changes and climate shocks into SMP updates, the city can support the adaptive capacity of its riparian and aquatic ecosystems.

- Some native plant and tree species are projected to respond well or have higher adaptive capacity to specific climate shocks or changing climatic conditions. The city can support native habitat and ecosystem resilience by using these species in future landscaping and restoration projects.
- Many plans in Bellevue identify and prioritize restoration and conservation of habitat. These plans can increase adaptive capacity by incorporating projected climate change impacts and designing restoration and conservation projects with the goal of assisting ecosystems in adapting to those impacts.
- Expansion of low-impact development practices can help mitigate runoff pollution and decrease incidence of urban flooding, promoting ecosystem health.
- Some adaptive capacity initiatives, such as the reduction of non-point pollution sources into waterways, require the public to make modifications to their own properties. The City can support these efforts through educational and incentive programs.
- Regulated wetland habitats within Bellevue are protected from development through the city's critical areas regulations. The city also manages wetlands on city property and seeks to restore ecosystem function. Wetlands can provide environmental benefits and ecosystem services, such as helping to mitigate flooding severity by capturing, storing, and filtering stormwater. There may be opportunities for the city to partner with private landowners, non-profit organizations, or others to expand wetland restoration efforts.
- Certain significant local species, including salmon and Douglas fir, are expected to be highly sensitive to climate change impacts. Habitat degradation and ecosystem fragmentation can further stress these native species and directly damage population by blocking naturally occurring species migration in response to climate change. The city can support the adaptive capacity of these and other culturally significant species, and the ecosystems of which they are a part, by implementing and supporting policies that protect and restore quality habitat and habitat connectivity.
- Bellevue has completed a series of Urban Tree Canopy Assessments, the most recent for 2019. These assessments serve to guide the city as they aim to protect and expand the urban canopy from 39% of the city's land area towards a goal of 40%. Restoring tree canopy can provide increased habitat for biodiversity, as well as secondary benefits such as mitigation of the urban heat island effect and shading of waterways and streams. These aims are aided in part by strategies included in the 2021-2025 Environmental Stewardship Plan:
 - 8% of the urban tree canopy overhangs impervious surfaces
 - Bellevue gained 2 percentage points of tree canopy between 2011 and 2019
 - 22% of the city has been identified as possible planting area while 39% has been identified as unsuitable
 - Tree canopy varies between neighborhoods. For example: Downtown, BelRed, and Factoria all have 20% or less coverage while Bridle Trails and Cougar Mountain/Lakemont exceed 50% coverage

- The 2021-2025 Environmental Stewardship Plan includes strategies to improve stormwater systems through the expansion of green infrastructure and system retrofits. Strategies to reduce municipal water usage by 10% are also included.
- The 2022 Parks & Open Space System Plan lays out a framework for the acquisition and development of new and existing parks and open spaces, including waterfront access, with a goal for all of Bellevue residents to live within a 1/3 mile of a park, open space, or trail head.
- Bellevue anticipates substantial population growth. Policies in the Environmental Stewardship Plan consider climate change impacts in land use planning. Implementation of these policies will be essential to minimize encroachment on undeveloped or rehabilitated ecosystems.
- Changes to the level of tree canopy and green space have secondary impacts on a number of ecosystem-related factors, including stormwater retention and ambient air quality. The benefits of increasing green space and tree canopy are reflected throughout the Bellevue Comprehensive Plan and the 2021-2025 Environmental Stewardship Plan.
- An updated Watershed Management Plan is currently being developed by the City of Bellevue, which will address projects to improve runoff pollution, habitat protection, and stream restoration.

3.4.4 Vulnerability Summary

The vulnerability of ecosystems in Bellevue to climate change impacts is moderate to moderate-high. Non-climate stressors including development pressure, adjacent land use, and historic land uses all magnify the level of sensitivity of many ecosystems experience in Bellevue. High levels of exposure and sensitivity are partially offset by moderate to high adaptive capacity in the form of substantial planning for the future of resources such as the Urban Tree Canopy and each of the city’s watersheds.

Table 13 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Ecosystems sector in Bellevue.

TABLE 13 Ecosystems: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High	Low	High	Many ecosystems will be highly impacted by extreme heat, and adaptive capacity is limited. The city can increase adaptive capacity through programs that promote overall ecosystem health.
Extreme Precipitation/ Flooding	High	High	Moderate	Extreme precipitation is expected to cause flooding, erosion, and habitat destruction. The city can increase adaptive capacity through Low-Impact

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
				Development and other water management programs.
Stream Temperature	High	Low	High	Many aquatic species are very vulnerable to changes in stream temperature, and opportunity for significant increases in adaptive capacity is limited.
Drought	Moderate	Moderate	Moderate	More frequent and more intense drought will stress species, decrease soil moisture, and impact streamflow and groundwater reserves.
Wildfire	Low	Low	Low	Periods of extreme heat, combined with more frequent drought, will increase potential for wildfire in large open spaces and urban forests. Some potential for wildfire smoke to impact animal species.

SOURCE: ESA 2023

3.5 Emergency Management

3.5.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for Emergency Management in Bellevue. The City of Bellevue performs emergency management through four phases: mitigation, preparedness, response, and recovery. All departments contribute to mitigation of potential hazards and emergencies through planning, regulation, and capital improvements. Emergency preparedness involves education, establishing procedures for continuity of operations, maintaining assets, and coordination with partners. While day-to-day emergency response is primarily handled by the Fire, Police, and other operational departments (Transportation, Utilities, Parks, etc.), larger emergencies can require disseminating information, coordinating resources, and an activation of the interdepartmental Emergency Operations Center (EOC). Recovery involves damage assessment, conducting repairs, and providing assistance to impacted people and organizations.

Emergency management is a complex system of efforts to ensure that protocol and resources are in place to minimize negative impacts from emergencies. Climate change presents a challenge to the emergency management system, which will have to respond with increasing frequency to increasingly severe extreme weather events and natural disasters. These changes could strain capacity and challenge current

approaches to mitigation, preparedness, response, and recovery. Climate change may or may not substantially alter Bellevue’s emergency management protocol, but managing greater and more frequent climate extremes will require adapting equipment, facilities, and services.

Local resources reviewed for this section include the following:

- [2018-2023 Bellevue Comprehensive Emergency Management Plan](#) (City of Bellevue Office of Emergency Management 2018)
- [2018-2023 Hazard Inventory and Risk Assessment](#) (City of Bellevue 2018)

ASSETS – EMERGENCY MANAGEMENT SERVICES

Fire Department Emergency Response Resources: The Bellevue Fire Department has 179 Firefighter-EMTs and 34 Firefighter-Paramedics. Nine fire stations (plus a paramedic unit stationed at Overlake Hospital) are located throughout the city to minimize response times. There are three aid cars equipped with basic life support and four parametric units with advanced life support equipment. In addition to the city, the Bellevue Fire Department provides services to the communities of Newcastle, Medina, Clyde Hill, Hunts Point, Yarrow Point and Village of Beaux Arts. In 2021, there were 22,545 incidents provided a response, and most are emergency medical related. Of 15,951 emergency medical incidents most required basic life services (two thirds) (Table 14).

TABLE 14 Bellevue Fire Department Emergency Medical Incidents

Service	2017	2018	2019	2020	2021
BLS	9,337	10,555	10,405	9,115	10,693
ALS	5,982	5,121	5,217	4,676	5,258
Total	15,319	15,346	15,622	13,791	15,951

Legend: BLS: basic life support ALS: advanced life support

SOURCE: Bellevue Fire Department 2022a

3.5.2 Potential Impacts

Potential impacts of note for Bellevue’s emergency management sector are extreme heat, extreme precipitation and flooding, and wildfires/wildfire smoke. Drought is not expected to be a major concern.

- Extreme weather events may strain resources of the departments of the City of Bellevue that provide emergency support functions, due to increased demand for emergency response and challenges to response. Increased frequency of precipitation and flood events could result in compounding impacts or prolonged emergency situations, which could overwhelm emergency management services and disrupt the continuity of operations. If emergency management personnel or systems are under-resourced for future climate conditions, they may struggle to maintain standard operating procedures for lower priority short-term response activities, such as documentation of efforts, status reports, or other administrative processes.

- Increased temperatures will result in more heat-related illness, especially among older residents, young children, and people with existing health issues. This will result in more emergency calls, which could strain emergency response capacity. Increases in the frequency of heat-related illness calls could demand that emergency response apparatus carry more fluids or ice than they currently have capacity for. There may be increased demand for emergency medical services for communities outside of the Bellevue Fire District, as Bellevue provides advanced life support services to numerous communities that have only basic life support training (e.g. Issaquah). Basic life support training does not allow for intravenous medical procedures, such as providing intravenous (IV) fluids, which is a standard procedure for people suffering from heat-related illness.
- Bellevue Fire CARES outreach efforts to vulnerable populations for welfare checks and to offer assistance will be required with greater frequency in a changing climate. Secondary resources to which CARES refers residents may become overwhelmed, which could direct the need for response back to police and fire departments.
- There will be increased demand for cooling centers and capacity of existing cooling centers may be exceeded. Information about cooling centers is not clearly publicized in a consistent manner. Having inconsistent hours and locations may increase the public's exposure to extreme heat if they travel to locations that are not serving as cooling centers. Seniors, low-income populations, people who are not fluent in English, and other vulnerable populations may not as easily access information online and could rely on established procedures when seeking respite or assistance. In addition, individuals without reliable transportation means may not easily access these sites.
- Greater numbers of people will seek out opportunities for swimming during extreme heat events, which could lead to a higher number of calls for water search and rescue operations. Lifeguards monitor beaches for part of the day at Meydenbauer Bay, Enatai Beach, Newcastle Beach, Clyde Beach, Chism Beach, and Chesterfield Beach. While there are a small number of other public waterfront access points, a majority of water access likely occurs on private land that cannot be monitored. As such, there can be additional challenges to quickly and safely accessing the location of water-based emergencies. Increasing occurrences or risks of drowning may increase demand for water rescue training and education around water safety.
- Extreme heat events increase the risk of power outages, due to overwhelmed energy infrastructure and increased energy demand. Power outages can disrupt emergency management activities, including communications, office operations, and response procedures, depending on the availability of battery-powered equipment. While personnel may be equipped with portable radios, centralized communication equipment and other technology at emergency management facilities are more likely to rely on the power grid.
- Response personnel may be more likely to experience heat-related illness due to exposure to the elements and exertion in extreme heat conditions, which could be exacerbated by wearing heavy uniforms. Increased exposure to extreme heat may necessitate additional education or training to remind emergency management personnel to take precautions to avoid heat-related illness.
- Power outages at water facilities can result in loss of pressure in hydrants, which can harm fire response. Power outages may result in failure of other utilities and safety systems at private buildings that could increase calls for emergency response.

- Extreme precipitation events will strain stormwater systems, especially in urban areas, which could necessitate closures, inspections, and evacuations of affected areas by emergency personnel. A concentrated response to urbanized areas of Bellevue could delay response to more remote areas of the city.
- Intense precipitation and storm events may result in power outages, which could impact emergency operations for facilities without backup power. Communications and utility systems may especially be vulnerable to storm events. Loss of communications would inhibit critical information-sharing procedures established by the Comprehensive Emergency Management Plan.
- Extreme precipitation events may affect the ability of emergency management personnel to respond to calls or require additional precautions. Heavy rain may require slower, cautious response from emergency vehicles. Roads inundated from stormwater may also require slower driving or alternative routes to destinations. Extreme precipitation in winter may result in ice that creates unsafe conditions in vehicles and on foot.
- Floodwaters may incapacitate certain emergency response vehicles and demand for amphibious vehicles or boats may increase.
- Increased demand for technical rescues in various disciplines, including structural collapse, may occur due to increased potential for landslides.
- Erosion or landslides resulting from extreme precipitation can damage roads, which would require emergency management coordination for road closure and redirecting traffic.
- Demand for technical rescue from floodwaters and inundated vehicles may increase due to increased frequency and severity of flood events.
- Drought conditions will heighten wildfire risk, which would likely result in more calls about brush fires and yard fires. The Fire Department may have to dedicate greater resources to communicating and enforcing burn bans and managing brush or yard fires.
- Drought conditions may strain the availability of water for emergency services, including firefighting and medical services. Demand for medical services and firefighting is likely to be somewhat elevated during a drought, especially in an emergency that has disrupted the availability of water. Firefighters can draw water from surface water sources, but medical services would require disinfected water sources that would be less readily available during a water supply emergency.
- If drought conditions strain drinking water resources, there may be a need for water distribution or assistance from emergency management personnel. Long-term disruptions to water service could entail additional planning for emergency assistance.
- Extended drought conditions may require stricter and more active enforcement of water bans.
- Wildfire smoke from outside of the city would present health risks, especially to elderly populations and those with existing health issues, which could increase emergency calls. Poor air quality from wildfire smoke is not easily mitigated. Public safety alerts would need to be communicated widely to the public to convey best practices for preventing exposure. CARES or other human services workers may have strained capacity doing outreach to vulnerable populations and could be exposed to unhealthy air quality conditions.

- Cumulative impacts from multiple emergencies, such as an earthquake during an extreme heat event, could strain existing emergency response systems and facilities.

3.5.3 Adaptive Capacity

Adaptive capacity for Emergency Management is the ability of Bellevue's Emergency Management systems to adequately respond to climate emergencies and minimize the impact of climate events on the community, without putting emergency management personnel at risk or straining resources.

- The City of Bellevue maintains a Comprehensive Emergency Management Plan, an all-hazards plan that provides a framework for how the city would respond to and recover from an emergency. As such, there are established methods of emergency management that can be implemented under any of the projected extreme weather events. The city could increase adaptive capacity by ensuring that its Comprehensive Emergency Management Plan accounts for projected increases in extreme weather and climate events.
- The City of Bellevue has an Emergency Water Supply Master Plan to address severe and long-lasting community water supply impacts anticipated from natural disasters in Bellevue's service area. The Plan is not itself intended to address emergency response, but summarizes vulnerabilities to the water supply and recommends mitigations that may ease the burden of emergency response in the event of natural disaster impacting water supply. The City can increase the adaptive capacity of Emergency Management by further incorporating climate impacts into the Emergency Water Supply Master Plan (City of Bellevue Utilities 2023).
- The longer-term impacts of climate change will allow for Emergency Management to plan for and adapt to projected future conditions. The sector can increase its adaptive capacity by proactively implementing programs that prepare it for intensifying climate change. This could include personnel training, updating risk assessment protocols, and communicating risks to the public.
- Climate change in the present could have short-term effects on the continuity of operations and delivery of services in Bellevue, which will provide opportunities to observe specific impacts and prepare for them before these impacts become more frequent or severe.
- Both the Fire and Police Departments have personnel who write proposals for and administer grants to support additional training, equipment, or resources for emergency management departments. The City of Bellevue has historically participated in emergency management grant programs to support training and equipment for emergency preparedness. The Bellevue Police Foundation also provides annual grants to the Bellevue Police Department, most of which are for equipment and training. Continuing to pursue these grants may provide future opportunities for improving the resilience of Bellevue's emergency management operations to climate change.
- The City of Bellevue is in the early stages of building electric vehicle charging capacity for its electric emergency vehicles. This includes adding Level 2 electric vehicle charging stations and establishing fast chargers on backup generators in case of emergency events.
- Recurring updates to plans for hazard mitigation, emergency management, growth management, and other affected areas of city operations will allow for opportunities to reassess historical impacts and projected changes, which can inform future adaptation.

- The City of Bellevue maintains development regulations that aim to prevent the creation of new risks to people and property by restricting impactful land use activities in hazard areas. Outcomes of the implementation of these regulations can be assessed to determine their effectiveness. Modifications to regulations can be made to account for climate change and related increases in risk to public health and safety, such as accounting for future flood extents.
- To increase the adaptive capacity of Emergency Management, departments can plan for and mitigate the impacts of projected climate changes on their personnel. Response personnel may need additional education or training to remind them to take precautions to avoid heat-related illness.
- The City of Bellevue has numerous active channels for communicating with the public, including King County & Bellevue Alerts, Bellevue Television, the city website, and social media. These communications channels are used to send out emergency information. There are also resources through King County's Office of Emergency Management (e.g. King County Alert, Reverse 9-1-1) that can be used to issue alerts directly to members of the public. These media could be used to increase education around risks, directing the public to emergency assistance and resources, and conveying further information about ongoing emergencies, which will be especially useful as emergency weather events become more severe in their impacts.
- The city has upsized culverts in the past to reduce the risk of flooding and has identified many capital projects to enhance the resilience of the drinking water supply during emergencies. Improvements could similarly be made to transportation infrastructure, such as evacuation routes or those to the hospital, or utilities at critical facilities.
- The city can plan for extreme weather events by setting up programs for cooling centers and evacuation locations for residents temporarily displaced by flooding and landslides. The city can increase adaptive capacity by creating a proactive, ongoing, and flexible protocol for opening and operating these emergency centers, rather than acting in response to an extreme weather event as it occurs.

3.5.4 Vulnerability Summary

Most of the major climate change-driven vulnerabilities to emergency management are related to capacity, facilities, and equipment. Emergency management personnel in Bellevue already respond to extreme weather events that are comparable to future conditions. More severe weather events will strain existing resources, but in many cases would not require different resources for emergency response. The potential for adaptive capacity in this sector is high. Minor impacts to emergency management primarily relate to mitigation and preparedness. Training and resources that support personnel enable success in their job performance; many such trainings and resources are already provided but may be insufficient for future needs. Emergency management personnel are often charged with responding to public behaviors, such as mental health crises, that create risk or worsen during emergencies. Under a more extreme climate, these behaviors may present greater vulnerabilities. Building adaptive capacity and preparedness to respond to them will be a critical component of reducing vulnerability.

Table 15 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Emergency Management sector in Bellevue.

TABLE 15 Emergency Management: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High	Moderate	High	Emergency Management departments will need to respond to increasing heat-related illnesses and search and rescue calls caused by extreme heat events. This could strain resources and place emergency responders at risk of heat illness.
Extreme Precipitation/ Flooding	High	Moderate	High	Extreme precipitation may cause power outages, which could impact fire response. Flooding and landslide emergencies will impact Emergency Management infrastructure and strain resources and capacity.
Stream Temperature	N/A	N/A	N/A	No significant impacts projected.
Drought	Low	Low-Moderate	Low	Drought may impact water supply for fire and medical emergencies and require water distribution during drinking water emergencies. This may limit the ability of Emergency Management to respond effectively to emergencies and strain resources/capacity.
Wildfire and Wildfire Smoke	Moderate-High	Low-Moderate	High	Wildfire risk, requiring emergency responders, is projected to increase, particularly during extreme heat and drought events. Wildfire smoke will increase emergency calls and require more robust emergency communication systems.

SOURCE: ESA 2023

3.6 Human Health

3.6.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for Human Health in Bellevue. Human health is influenced by countless environmental, social, and economic

factors. The City of Bellevue supports healthy living and communities through regulation of the environment, provision of community resources and facilities, management of utilities and services, and engagement with the population. Climate change can impact people and the systems currently in place to maintain public health through harmful weather conditions, disruption of services, increasing the potential for exposure to hazardous materials, and increasing the exposure of vulnerable populations.

Climate change events can exacerbate pre-existing health conditions. Additionally, persons with less economic resources and BIPOC populations or those who speak English less than very well can have difficulty preparing for and recovering from climate change events. The City of Bellevue supports human health through its human services programs, parks and recreation, and emergency medical services, and this section identifies potential hazards and strategies to promote community health and well-being including building on Bellevue's current programs and policies.

Local resources reviewed for this section include the following:

- [Bellevue Comprehensive Plan – Human Services Element](#) (City of Bellevue Community Development 2015)
- [Bellevue Parks & Open Space System Plan](#) (City of Bellevue Parks & Community Services 2022)
- [Sustainable Bellevue: Environmental Stewardship Plan](#) (City of Bellevue Community Development 2020a)
- [Blueprint for Addressing Climate Change and Health](#) (Seattle-King County Public Health Department n.d.)

ASSETS – HUMAN HEALTH

- **Residential Population:** The Washington Office of Financial Management estimates Bellevue's 2022 population at 153,900 people, making it the second-largest city in King County.
- **Human Services Resources:** The City of Bellevue convenes human service providers and manages a human services fund meant to meet basic human needs for: survival, finding and retaining gainful employment, support in times of personal and family crisis, assistance in overcoming family or individual problems, and help in gaining access to available, appropriate services.
- **Recreation Facilities:** City park assets include over 2,700 acres of land, 98 miles of multi-use trails, 30 sport fields, 63 sport courts, 47 playgrounds, 13 picnic shelters, four community centers, three community farms, and 100 community garden plots.
- **King County operates four libraries in Bellevue, which have air conditioning and have operated as cooling centers.**
- **Neighborhoods:** Bellevue has fourteen designated neighborhoods and roughly 50 neighborhood associations, which help to build connections within local communities.
- **Mini City Hall:** Bellevue's Mini City Hall is a neighborhood service center at the Crossroads mall, which provides referrals to human services providers and other resources for Bellevue residents.

- Overlake Hospital is the primary hospital in Bellevue, and Seattle Children’s Hospital operates a clinic, surgery center, and urgent care in Bellevue. Kaiser Permanente Medical Center offers urgent care and other services.

3.6.2 Potential Impacts

Potential impacts of concern for human health are high temperatures/extreme heat events and wildfires, especially wildfire smoke. Extreme precipitation events and flooding, and higher water temperatures in streams and lakes also present potential vulnerabilities for human health.

- Increased temperatures will worsen the urban heat island effect, where built environments absorb and retain heat. Urban heat island effects are worse in areas with limited tree canopy or natural ground cover, which provide shade and cool the air. The average urban tree canopy coverage in Bellevue neighborhoods is 39%, but the following neighborhoods have notably lower urban tree canopy: BelRed (14%), Downtown (9%), Crossroads (31%), and Factoria (20%). King County’s heat island mapping study demonstrates that many of these areas, as well as Lake Hills, retain high levels of heat into the evening, while much of the city cools. Seniors and people with disabilities are especially vulnerable to heat-related illness. BelRed and Northeast Bellevue both have relatively high numbers of senior residents, while Lake Hills and Northeast Bellevue have relatively high numbers of people with disabilities. People in these neighborhoods could have more significant health impacts during extreme heat.
- Extreme heat and prolonged periods of high temperatures can strain the electric grid, with power outages presenting a significant risk to human health, due to the need for electricity to provide critical services and maintain safe conditions at home.
- Increases in average annual temperature and frequency of extreme heat events have increased the demand for air conditioning. Higher levels of air conditioning usage result in significant increases in energy demand during warm months, in addition to the demand increases from fans, refrigerators, and people spending more time inside. High energy demand threatens power outages, putting the public at increased risk of extreme heat exposure. In 2013, 16% of households in the Seattle-Tacoma-Bellevue Metropolitan Statistical Area had air conditioning, which had increased to 53% of households by 2021. In 2013, 9% of households up to 150% of the poverty line had air conditioners, which increased to 11% by 2021, while the overall proportion of households in poverty increased. As such, low-income populations are at a high-risk of exposure to extreme heat, with limited adaptive capacity at home. Households without air conditioning would already have elevated temperatures at the start of a power outage, creating increased sensitivity to the power outage for these households, which would also experience exposure to extreme heat indoors sooner than a house that was running air conditioning at the start of an outage. Buildings with greater mass tend to retain heat more effectively, increasing the risks to low-income and other vulnerable populations, who are more likely to live in multifamily or congregate housing situations. Seniors and people with disabilities would have heightened sensitivities to these conditions, especially if they are low-income or living in multifamily or congregate housing.
- Increased stormwater flooding and extreme weather conditions in general can increase risks of systems failures and illicit discharges of hazardous waste at sites that handle or store hazardous materials. Release of hazardous materials can have negative health consequences or necessitate evacuation of the area. The EPA’s Environmental Justice Index places the BelRed neighborhood above the 90th percentile in the state for hazardous waste proximity. The Environmental Justice Index weights metrics

based on the vulnerability of the population in the area. While hazardous waste proximity in the neighborhood ranges from the 72nd to the 81st percentile in the state, the socioeconomic demographics of the population in BelRed reflect a higher sensitivity to hazards.

- Increases in extreme precipitation events and flood extents will produce waterlogged soil, which can be unstable and hinder drainage into the soil. Waterlogged soil or flooded areas can lead to sewer backups from septic systems. Most of Bellevue is connected to the King County wastewater system, but a few neighborhoods have high concentrations of septic systems, including the Bridle Trails neighborhood and a section of the Newport neighborhood between 118th Avenue SE and I-405. The Newport area may be especially impacted by waterlogged soil, as much of the area between 118th Ave SE and the Lake Washington waterfront is in the 1% annual chance floodplain. Inundation of these lower areas could slow drainage out of the neighborhood and backup septic systems.
- Extreme precipitation and flooding can create unsafe living conditions through damage to structures and introduction of harmful materials in floodwaters. Buildings exposed to wet conditions through inundation, roof leaks, or damage to utilities risk growing mold, if not dried or cleaned sufficiently. Mold exposure can create serious health conditions and worsen existing conditions, especially respiratory diseases. The risk of exposure to mold or harmful materials is higher for those living in older houses, which are more likely to have been built prior to floodplain development regulations. Older homes may also be in worse states of deterioration and may be more likely to utilize organic materials such as wood that mold grow on. Low-income residents may lack adaptive capacity to professionally repair or clean flood damage, while senior and disabled residents are less likely to be able to perform needed cleaning or repairs after their homes are damaged.
- Heavy rains can produce dangerous travel conditions that result in higher numbers of accidents. Large numbers of injuries in a concentrated time period may overwhelm the Overlake Medical Center, especially if other regional hospitals are experiencing similar service demand or road conditions make other hospitals inaccessible. Flooded roadways are a serious hazard, with a majority of flood-related drownings occurring when vehicles are driven into floodwaters. However, the few locations where roads are at risk of flooding in Bellevue indicate that a more common hazard would be injuries from slippery road conditions. Rain events in general can create hazardous travel conditions, but high-volume winter freezing-rain events have produced icy conditions in recent history that resulted in significant increases in injury.
- Ice from large precipitation events is harder to remove from streets and sidewalks and is present for longer periods of time, exposing more people to the hazard. During a December 2022 ice storm, the Seattle Fire Department had its highest call volume on record, which included over 300 calls for falls on the ice, approximately one-third of which required hospitalization. During the same storm, Washington State Patrol responded to hundreds of vehicle collisions in King County. People who cannot work from home, especially those in service industries, would be most exposed to risks of fall and collisions.
- Increased temperatures in Lake Washington will improve growing conditions for cyanobacteria (blue-green algae), which can cause irritation from skin contact and severe illness if ingested. Pets may experience organ damage or death if consuming water with cyanobacteria. Limited English speaking and low-income populations may be most vulnerable to cyanobacteria exposure, as they may be more likely to rely on public facilities for recreation, may not have appropriate technology access to receive

alerts, and warning signage at beaches may not be translated. However, private waterfront exposure could be much more significant, as water quality would not be monitored at private properties.

- Increased wildfire risks will worsen air quality, as wildfire smoke contains carcinogenic particulate matter that can irritate the lungs. Exposure to wildfire smoke would have negative health impacts for anyone, but it would be particularly harmful for people with respiratory diseases, such as asthma, seniors, and young children. Bellevue has a fairly average asthma rate for King County, with little variation across Census Tracts. The highest asthma rates are in Lake Hills, but they are not particularly elevated. People living or working near the highways in Bellevue have heightened levels of exposure to a variety of harmful pollutants, which can impair lung development, reduce lung function, and increase risks of lung disease, in addition to non-respiratory impacts. Extended periods of poor air quality due to wildfire smoke, coupled with degraded air quality where people live or work, could increase development of respiratory disease and drive increased hospitalizations. The large senior population in BelRed and somewhat high percentage of children living in Eastgate may be more vulnerable to wildfire smoke impacts because they both belong to groups associated with higher sensitivity, combined with increased exposure from proximity to highway pollution if they are within the APEZ.
- Wildfire smoke may indirectly impact mental health. The Washington Department of Health has warned of psychological stress as a symptom of exposure to smoke. The presence of wildfire smoke has been described in research as causing “solastalgia,” which is place-based distress related to environmental change. The direct impacts of wildfire smoke on mental health have not been extensively studied (Eisenman et al. 2021). However, spending extended periods of time inside, which is frequently encouraged to avoid poor air quality, has been studied extensively and been found to cause heightened stress levels and depression. As such, people who follow best practices and avoid wildfire smoke are still at risk of health impacts.
- Although Bellevue is a more affluent community, some demographic risk factors include a high share of BIPOC residents including those that are foreign born and speak English less than very well, and older adults and those living alone. A lack of affordable housing is also a risk. The link between demographic factors and climate stressors is described in more detail in Table 16. Generally, age, health, income, race, immigration/language, and other factors can increase vulnerability to extreme heat, flooding, and wildfire smoke.

TABLE 16 Demographics and Link to Climate Stressors

Demographics	Vulnerability	Heat	Flood	Smoke
Children, <5 years old	Breathe more air and drink more water per body weight than adults Developing organs and low immunity Dependent on adults More time spent outdoors	X	X	X
Older Adults, > 64 years old	Low immunity Pre-existing conditions Limited mobility	X	X	X

Demographics	Vulnerability	Heat	Flood	Smoke
Communities of Color	Structural racism Inadequate infrastructure Health disparities Lack of social capital	X	X	X
Low-Income Communities	Less resources and means to evacuate Inadequate infrastructure	X	X	
Living Alone	May be less connected to information or community.	X	X	
Immigrants (inc. limited English)	Lesser English language abilities and cultural differences during evacuation Access to post-disaster funding		X	
Disabled	Limited access to knowledge, resources, and services to effectively respond to environmental change Compromised health makes people with disabilities more vulnerable to extreme climate events or infectious diseases More likely to have difficulties during required evacuations	X	X	X
Unemployment	The potential loss of employment following a disaster exacerbates the number of unemployed workers in a community, contributing to a slower recovery from the disaster.	X	X	
Outdoor workers	Exposure to high temperatures, air pollution, extreme weather and natural disasters, and biological hazards	X		X
Persons with pre-existing or chronic medical conditions	Climate stressors can increase respiratory and cardiovascular disease, injuries and premature deaths related to extreme weather events, increased exposure to food- and water-borne illnesses and other infectious diseases, and threats to mental health	X	X	X
Pregnancy	Exposure to high temperatures or air pollution could increase the potential for babies to be premature, underweight or stillborn.	X		
Education—less than high school degree	Lower education constrains the ability to understand warning information and access to recovery information.	X	X	X

Note: * The CVI addresses outdoor workers in the heat index based on a review of literature and example climate index models.

SOURCES: APHA 2021; Cutter, 2003; EPA 2021; Lundgren and Jonsson 2012; Reid et al. 2009; Yu et al. 2021

Table 17 shows that these risk factors are not evenly distributed throughout the city; some neighborhoods are more vulnerable to climate impacts than others due to their demographic makeup. Bellevue has a high share of BIPOC population and persons speaking English less than very well. Older adults and adults living alone are also notable at above 10%.

TABLE 17 Geographic Distribution of Demographic Risks from Climate Impacts

Demographics	Citywide Statistics	Neighborhoods with Greater Share
Children, <5 years old	4.4%	BelRed, Crossroads, Eastgate, Newport, West Bellevue, West Lake Sammamish
Older Adults, > 65 years old	15.0%	Crossroads, Northeast Bellevue
Communities of Color (non-White including Hispanic)	56.5%	BelRed, Bridle Trails, Cougar Mountain, Crossroads, Lake Hills, Somerset, West Bellevue
Low-Income Communities (Poverty Rate)	7.4%	BelRed, Crossroads, Lake Hills, Factoria, Newport
Living Alone	14.6%	BelRed, Downtown
Immigrants (inc. limited English)		
- Foreign Born	42.0%	
- Speak English less than “very well”	16.5%	Linguistic Isolation: Downtown
Disabled	9.5%	Unmapped
Unemployment	3.8%	Crossroads, Newport, Northeast Bellevue, Northwest Bellevue, Woodridge
Outdoor workers	4.1%	Eastgate, Newport, Northeast Bellevue, West Lake Sammamish, Woodridge
Persons with pre-existing or chronic medical conditions		
- Fair or poor health%	8.5%	Crossroads, Eastgate, Factoria, Lake Hills, Newport, Somerset, West Lake Sammamish
Education – less than high school degree	10%	Northwest Bellevue

SOURCES: ACS 2022; Seattle-King County Public Health Department n.d

3.6.3 Adaptive Capacity

Adaptive capacity for Human Health is the city’s ability to minimize the health risks of climate impacts to its community while addressing demographic-related disparities in climate health risks to the city’s population.

- The City of Bellevue incorporates public health considerations into strategic planning efforts, such as its Tree Giveaway program, which targets neighborhoods with low tree canopy and low tree equity scores. Consistently assessing public health risks and how to alleviate them in planning efforts will help to build capacity and competencies for managing health impacts of climate extremes.
- The city, via the Utilities Department and in coordination with the Seattle-King County Health Department, regulates septic systems that pose a threat to public health. Septic systems are at risk of failing under flood and extreme precipitation conditions, which will make maintaining these systems more difficult for property owners as climate change worsens. State and County regulations establish when there is a need for a property with a septic system to connect to a public sewer, but the city has

the capacity for outreach to septic owners and to financially support property owners in connecting to public sewer systems.

- The City of Bellevue provides supplemental public transportation options and works with partners to improve existing public transportation resources. Most community centers, libraries, and major medical centers are accessible through multiple public transportation options, some are underserved, such as the Highland Community Center in BelRed, which can be directly accessed through only one bus route. Providing public transit information when utilizing public facilities for emergency services can improve access. Additionally, the City of Bellevue could implement expanded paratransit services during emergencies or work with King County Metro to expand access to these services that are crucial for senior and disabled populations.
- The City of Bellevue has established community centers and libraries as cooling centers during heat waves in recent years. Excessive heat warnings and cooling center announcements on the city's website have historically identified four community centers as cooling centers (e.g. Crossroads, Highland, North Bellevue, and South Bellevue), which are all located on the east side of the city. King County operates four libraries in Bellevue, all of which are air conditioned and most of which have operated as cooling centers during heat waves. See section 3.5.3 for further discussion.
- King County Metro Transit also provides service to cooling and heating centers during extreme temperature events. During previous extreme heat events, King County Metro Transit did not collect fares for individuals travelling to cooling centers.
- The adaptive capacity of low-income households to extreme heat and wildfire smoke can be supported by the city through connecting households with existing energy assistance and weatherization programs. The federally-funded [Low-Income Home Energy Assistance Program](#) can provide low-income households with assistance on utility bills, as well as pay for air conditioners and air purifiers. [PSE's Home Energy Lifeline Program](#) also provides assistance with bill payment for low-income households. [Home Weatherization Assistance](#) provided through state and federal funding funds improvements for low-income households, such as air sealing, energy conservation, and improving indoor air quality, which reduces the financial burden of maintaining cool and healthy indoor spaces. Energy Smart Eastside provides incentives for low and moderate income Bellevue households to install energy efficient heat pumps, which can be run in reverse to air condition a home.
- BelRed and the Downtown district have the two lowest percentages for possible planting area for new trees and the two lowest percentages of existing tree canopy. The City of Bellevue has limited capacity to directly plant new trees in these areas to adapt to climate change, except on public property. The ability to increase tree canopy in these areas would mainly be through development requirements or partnership with private property owners in these areas. This could be performed through land use standards in the Bellevue Land Use Code, such as 20.20.900 Tree Retention and Replacement or 20.25A.120 Green and Sustainability Factor.
- Low-income populations may have limited adaptive capacity that could increase their vulnerability, such as needing to physically go to work during a climate emergency, being unable to afford air conditioning, or lacking the funds to make repairs after a flood. People in the eastern part of the Crossroads neighborhood and the northeast corner of Lake Hills may especially lack adaptive capacity, as the two Census Tracts in this area currently have high concentrations of low-income populations and have the highest ratios of housing cost to income in Bellevue.

- Limited English-speaking populations may have reduced adaptive capacity due to reduced accessibility of information and reduced ability to communicate needs. The area bounded by 64th Ave SE and NE 8th Street that consists of the Landmark Apartments, Bellepark East Apartments, and Woodside East Apartments is currently above the 90th percentile in Washington for limited English speaking and low-income. The City of Bellevue has the capacity to translate weather emergency information and perform outreach to vulnerable populations during weather emergencies to ensure they are aware of available resources.
- The city can perform similar public health information outreach to limited English-speaking populations for other climate-related impacts such as swimming closures due to algal blooms or wildfire smoke / poor air quality.

3.6.4 Vulnerability Summary

Human health vulnerabilities to climate change in Bellevue are largely an outcome of increased exposure to climate hazards of people with existing sensitivities (e.g. respiratory diseases, aging, outdated buildings or infrastructure). Human health impacts are not expected to be evenly distributed throughout Bellevue’s population—certain groups are more vulnerable than others due to demographic factors. Inclusive planning efforts that work to reach vulnerable populations will help the City of Bellevue identify sensitivities and plan for appropriate adaptations. Vulnerabilities based in infrastructure are already regulated by the City of Bellevue or King County. Monitoring outcomes of existing policies and identifying opportunities to improve those policies to meet the needs of the future will allow Bellevue to effectively respond to impacts to human health in the built environment.

Many of the populations currently most vulnerable to climate change are concentrated in specific neighborhoods, particularly Downtown, BelRed, Crossroads, and Newport. The city can address disparities in vulnerability by focusing outreach, needs assessment, and community-based adaptive capacity programs on highly vulnerable neighborhoods, as identified by current data.

Table 18 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Human Health sector in Bellevue.

TABLE 18 Human Health: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High	Moderate	High	Extreme heat is expected to cause increases in heat-related illness, particularly among elderly populations and those with disabilities and/or pre-existing health conditions. Cooling centers, urban tree canopy, and home energy programs for low-income

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
				residents can increase adaptive capacity.
Extreme Precipitation/ Flooding	Moderate-High	Moderate	Moderate-High	Extreme precipitation is projected to cause increased accidents, physical injuries, and damage to housing with negative human health impacts. Extreme weather alerts and post-disaster repair assistance for residents can increase adaptive capacity.
Stream / Lake Temperature	Low-Moderate	Moderate	Low-Moderate	Higher water temperatures can cause toxic algal blooms. Low-income residents may be at highest risk of health impacts due to greater exposure. Better public information dissemination channels and closures of public swimming areas during blooms can increase adaptive capacity.
Drought	Low	Moderate	Low	Because of the region’s high reliance on hydropower, drought can strain the electrical grid. Drought-related power outages during extreme heat events can cause heat-related illness. Programs that improve energy efficiency and efficient use of water resources can improve adaptive capacity.
Wildfire Smoke	High	Low-Moderate	High	Wildfire smoke is expected to cause respiratory injury and illness as well as mental health impacts. Programs that support installation of air purification for low-income residents can increase adaptive capacity.

SOURCE: ESA 2023

3.7 Land Use & Development

3.7.1 Sector Overview

This section addresses how climate change may affect current land use patterns and planned growth in Bellevue. Bellevue is a metropolitan city with a wide range of economic and retail centers, residential neighborhoods, parks and trails, and civic facilities, governed by the Comprehensive Plan and Land Use

Code. The city also has a network of high rank order wetlands and bogs, streams, and Geologic Hazard Areas protected by critical areas regulations. Bellevue fronts on two major lakes, Lake Washington and Lake Sammamish, and implements a Shoreline Master Program. The city is growing rapidly and has one of the highest target growth rates in the region. The city is planning for new jobs and housing growth with additional transit-oriented development and other policies. The city is currently in the process of updating its Comprehensive Plan, which will direct growth and development through 2044.

Local resources reviewed for this section include the following:

- [City of Bellevue Land Use Code](#)
- [Environmental Stewardship Plan](#) (City of Bellevue Community Development 2020a)
- [Vision 2050](#) (Puget Sound Regional Council – PSRC, 2023)

ASSETS – LAND USE & DEVELOPMENT

- Over the last several decades, Bellevue has grown significantly and has become a major employment center. This growth in population and jobs is projected to continue rapidly, with totals for both expected to exceed 220,000 by 2044 (PSRC, LUV-it model; PSRC 2023).
- The majority of the land in Bellevue is currently zoned for single-family development (a designation that includes most of the city's parks and schools), though recent growth has occurred in mixed-use Countywide centers and corridors (Figure 20). The City of Bellevue is in the process of updating its Comprehensive Plan and Land Use Code, which will direct growth within the city through 2044 and will continue to focus development near transit and increase mobility options and the essential components of livability for people who live and work in Bellevue.
- One of the requirements of the Comprehensive Plan Periodic Update is for cities to plan for "a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region." Bellevue recognizes the need to plan for and encourage what is often referred to as 'missing' middle housing; this is housing that fills the gap between single-family development and smaller apartment or condo units in large buildings that constitute most of the housing units built in the past two decades. Currently, Bellevue permits Attached Accessory Dwelling Units (ADUs) in single-family zones, provided they meet certain criteria defined in the Land Use Code. In 2023, the state legislature passed House Bill 1110 (Middle Housing) and HB 1337 (Accessory Dwelling Units). HB 1110 requires cities over a certain size (including Bellevue) to permit four units per lot (with up to 6 units, depending on the proximity to transit and if affordable units are provided) in single-family zones, with certain exceptions and contingent on meeting criteria defined in the bill. HB 1337 requires cities to allow up to two accessory dwelling units (either attached or detached to the primary residence) per residential lot based on criteria in the bill. The impacts of HB 1110 and HB 1337 are being analyzed as part of the environmental review of the Comprehensive Plan Periodic Update. Bellevue's implementation of these bills is expected to expand housing options to more types of households.
- Sound Transit's East Link light rail line will extend fourteen miles from downtown Seattle to the Overlake area in Redmond, with six stations in Bellevue as well as stations in Mercer Island and Redmond. Passenger service between Bellevue and Redmond (through a "Starter Line") is expected to

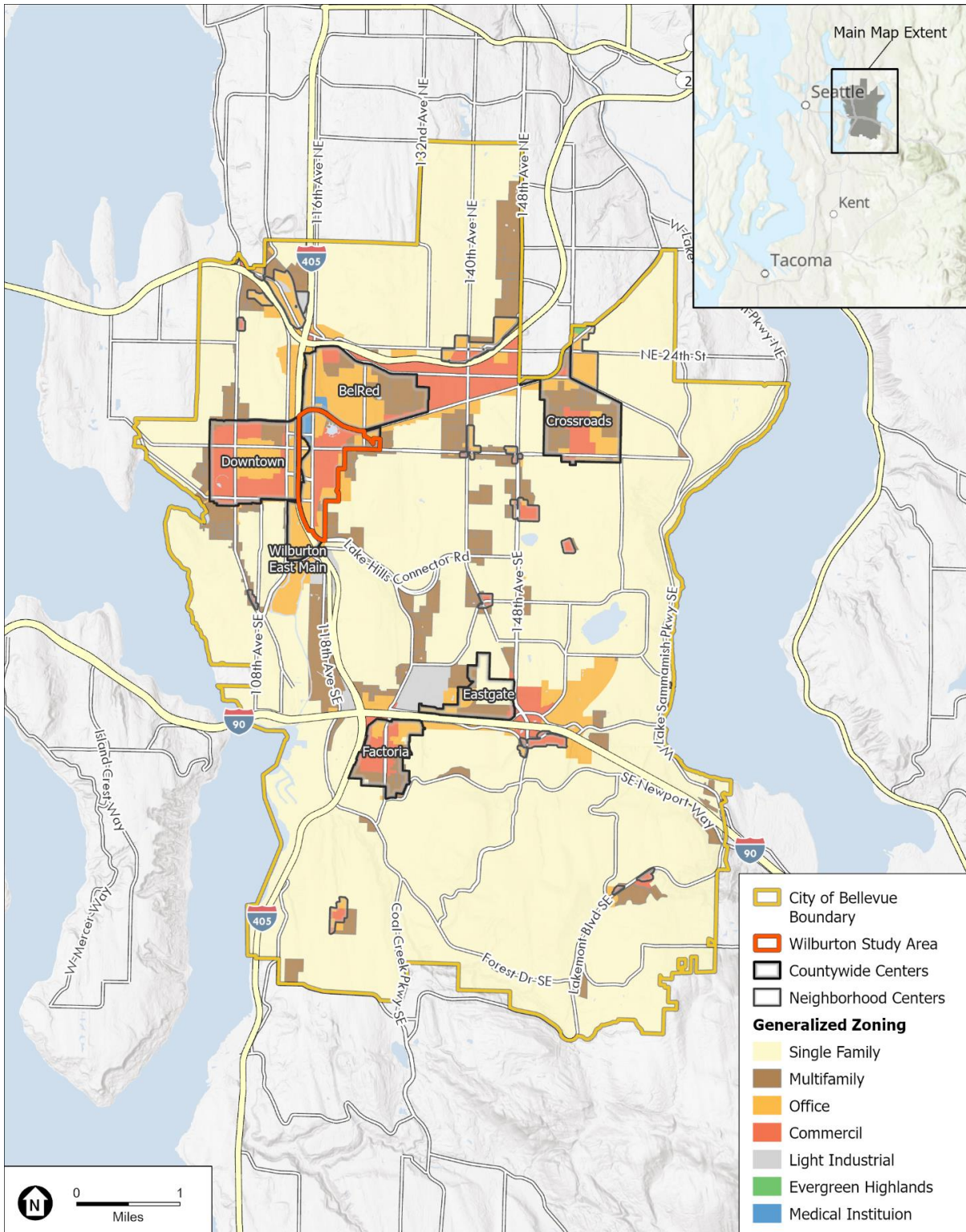
begin in 2024, with full service to Mercer Island and Seattle expected in 2025. Once service begins, East Link will be known as the “2 Line”.

- In April of 2022, the Bellevue City Council directed staff to implement the vision for the west edge of the Wilburton neighborhood area (aka Wilburton study area). The vision was developed by a Citizen Advisory Committee (CAC) in 2018. Council directed staff to update the vision to consider citywide growth targets, housing, sustainability, and multimodal transportation. This initiative will amend the city’s policies and codes to facilitate changes that can help best achieve this vision.
- Built on a former railroad, the Eastrail trail will eventually connect Eastside cities from Renton all the way to Woodinville and Snohomish County. In 2018 the Wilburton Commercial Area Citizen Advisory Committee presented recommendations to the Bellevue City Council that envision Eastrail as a signature public space with art, nature, retail, and community events all along the route. To help realize this vision, the City of Bellevue is partnering with King County Parks and Sound Transit to develop a vision for the portion of the Eastrail trail that runs from SE 5th Street to NE 12th Street in Wilburton.

TABLE 19 Current Zoning

Generalized Zoning	Acres
Single-family	16,309
Multi-family	2,020
Office	1,826
Commercial	1,157
Light Industrial	215
Evergreen Highlands	7
Medical Institution	29
Total	21,562

SOURCE: City of Bellevue, BERK 2023



SOURCES: City of Bellevue, BERK 2023

FIGURE 20 Bellevue Generalized Zoning

3.7.2 Potential Impacts

Bellevue's current land use patterns and future development may be vulnerable to the following potential impacts of climate change:

- Urban heat island effects at parking lots and other areas of extensive asphalt or other dark materials could increase risks to people's health and comfort, particularly during extreme heat events. This risk has the potential to be exacerbated by expected increases in development in the city's urban core and some neighborhood centers, although it should be noted that regulations for planting trees and providing landscaping during redevelopment may increase green space and tree canopy in certain areas even as they urbanize.
- Extreme precipitation events and unpredictable precipitation patterns are expected to increase localized flooding and erosion, possibly leading to landslides. Current infrastructure was not designed for the degree of precipitation projected, and current zoning does not take into account climate-driven changes in frequency and severity of erosion or landslides.
- In addition to flooding impacts to buildings and adjacent infrastructure (described in 3.1 Buildings & Energy), extreme precipitation could affect geologic hazard areas. Neighborhoods with more risk of erosion include Bridle Trails, Northeast Bellevue, West Lake Sammamish, West Bellevue, and Northwest Bellevue, particularly lands along shorelines. Steep slopes, which are more at risk of erosion and landslides, are more extensive throughout West Bellevue and particularly in West Lake Sammamish and Cougar Mountain.
- Infrastructure is at risk of damage during extreme weather events. Bridges and roads, stormwater facilities, and water and wastewater systems, among other infrastructure, could be affected by extreme weather or new chronic conditions such as flooding or heat.
- Extreme weather events, including precipitation events and flooding, are expected to increase climate-induced displacement and changes in housing stock availability. Displacement could also occur as a result of extreme heat and wildfire smoke, as certain households lack resources to secure cooling and clean air. Displacement of households with existing housing security challenges could be exacerbated by climate stressors (see additional information below).
- Drought is likely to damage urban landscaping, including parks and other public greenspaces. Drought may also impact the city's tree canopy, which is critical to minimizing the urban heat island effect.
- Wildfire smoke is expected to impact public health and could increase displacement as a result. However, because wildfire smoke impacts are expected to be more evenly distributed throughout the city and larger region, wildfire smoke is not likely to impact the land use or development pattern of the city as a whole. The risk of wildfire itself is low for Bellevue, however the city should continue to monitor the evolving climate science around wildfire risks in western Washington and King County, especially for the wildland urban interface. If wildfire risk does increase in King County, it could negatively impact tree canopy as people seek to create defensible space around homes and other structures.

Displacement Risk for Housing

Households across Bellevue are already at risk of displacement due to high housing costs and potential for redevelopment (see Table 20). As described above, climate change stressors have the potential to exacerbate the risk of displacement further. Households with limited resources are at greater risk for displacement, due to potentially compounding costs such as physical damage to structures from flooding, increased energy use for cooling, and healthcare costs to treat illness from extreme heat or smoke. Due to market pressures along with the presence of floodplains, low tree canopy coverage, and relatively higher proportions of people with adverse health and/or lower incomes, the neighborhood areas of West Bellevue, Wilburton, Lake Hills, and West Lake Sammamish have relatively higher proportions of households at risk of experiencing displacement than other parts of the city.

TABLE 20 Housing Unit Displacement Risk, Bellevue Neighborhoods

Neighborhoods	Lower		Moderate		Higher	
	SF	MF	SF	MF	SF	MF
BelRed	36	1,702	61	36	-	-
Bridle Trails	957	31	1,001	2,955	-	-
Cougar Mountain / Lakemont	3,744	440	-	-	-	-
Crossroads	-	-	840	3,878	392	1,541
Downtown	-	-	79	9,884	-	-
Eastgate	1,145	48	1,404	125	-	-
Factoria	-	-	396	1,009	-	-
Lake Hills	196	-	4,359	1,935	330	91
Newport	2,347	171	1,086	207	-	-
Northeast Bellevue	3,890	163	-	-	-	-
Northwest Bellevue	220	474	2,231	1,489	-	-
Somerset	2,896	-	10	-	-	-
West Bellevue	1,536	859	650	917	-	-
West Lake Sammamish	1,683	322	419	-	-	-
Wilburton	-	-	900	1,048	-	-
Woodridge	1,176	395	97	571	-	-
Total	19,826	4,605	13,533	24,054	722	1,632

SF = Single Family, MF = Multifamily

SOURCE: PSRC 2023

3.7.3 Adaptive Capacity

Adaptive capacity for Land Use and Development is the ability of the city to plan for and minimize the projected impacts of climate change to its growth and development through codes and land use planning.

Bellevue plans for its long-term growth in its Comprehensive Plan. The periodic update due in 2024 is an opportunity to integrate climate change resilience more fully into policies related to land use and development. Climate resilience is a key consideration during this update process. To increase the adaptive capacity of both current land uses and future development, the City has opportunities to further integrate climate resilience into its policies and then utilize those policies to guide the adoption of development standards throughout the city.

When planning for future development, Bellevue can foster redundancy in the provision of essential goods and services by distributing commercial uses in neighborhood centers throughout the city. This will create access to essential goods and services in multiple places, reducing the impact of a climate shock to any one area that might otherwise isolate residents from essential goods and services. Currently, Downtown and BelRed are the city's largest mixed-use centers. The Comprehensive Plan update and associated Land Use Code changes give the city opportunities to create more centers focused around housing, retail, jobs, bike and pedestrian infrastructure, and new transit.

By implementing climate-smart development standards, the city can increase the adaptive capacity of the development sector and mitigate the impact of climate stress on new development. These can include standards that increase the capacity of infrastructure to withstand the impacts of extreme heat and precipitation, as well as resiliency and efficiency standards.

The city has some existing programs that bolster the adaptive capacity of the development sector, including the Clean Buildings Incentive Program, which assists commercial buildings of over 50,000 square feet to comply with the Washington Clean Building Performance Standard, and the Bellevue 2030 District—a recently launched public-private partnership that works to reduce energy use, water use, and GHG emissions from transportation in new and existing buildings. Both programs bring together developers, property owners, and city government to implement climate resiliency in the development sector. Bellevue can expand these programs and create others like them to increase the resiliency of new development. The Energy Smart Eastside Program supports the retrofitting of existing residential buildings to energy efficient heat pumps, helping to expand access to air conditioning for vulnerable residents and reducing energy costs.

At a smaller scale, Bellevue can use site design to build adaptive capacity for stormwater infiltration by creating design standards and guidelines that require soil enhancement and landscaping on building sites and streetscapes.

The City uses best available science (BAS) when updating its critical area regulations, as required by state law. In some circumstances BAS may include evaluating or incorporating the projected impacts of climate change—such as extreme precipitation, low streamflow, and decreased soil moisture—to protect wetlands, streams, aquifers, floodplains, and geologic hazard areas. The city could also increase adaptive capacity of land use and development by considering climate risks when designating areas of high development, including the adoption of codes, standards and regulations that are informed by potential climate impacts and apply to new development in areas expected to be at increased risk of climate-exacerbated impacts.

The City of Bellevue has several development regulations in the City's critical areas code, Part 20.25H LUC, intended to minimize the risk of landslides in connection with development. The land-use code and critical areas regulations limit construction and the clearing of vegetation in geological hazard areas identified throughout the city. The City of Bellevue also regulates development in areas of steep slopes and in areas with identified drainage routes that are susceptible to erosion. Other efforts may include maintaining vegetation on sloped areas to stabilize soil and connecting all storm drains to channel runoff to approved areas outside of slopes and hillsides. Adaptive capacity can be further increased by considering projected future precipitation patterns and volumes into these codes and regulations as they are updated, based on best available science.

A climate-exacerbated risk of high concern to land use and development is the potential for housing stock damage and loss, and resulting displacement of households, especially those with preexisting health conditions and limited resources. A key area of focus for the Comprehensive Plan update is the Housing Element, which must be amended to meet recent State requirements to supply housing for all income levels, and to remove racially disparate impacts that impede access to housing, including ownership housing. As the city plans for and accommodates increased housing supply and improved housing quality across all income levels, the City could also increase adaptive capacity by incorporating climate resilience into this planning initiative. Expanding the city's Energy Smart Eastside Campaign, which includes the Boost Program that covers the cost of a heat pump for low-income residents, could also help decrease displacement in low-income neighborhoods.

3.7.4 Vulnerability Summary

Current land use patterns and future development are vulnerable to several of the evaluated climate impacts: increased air temperature/extreme heat, extreme precipitation and flooding, drought, and wildfire smoke. Potentially significant impacts include infrastructure damage as a result of extreme heat and intense rainfall events, as well as damage to the urban landscape from drought. Of particular concern is the risk of displacement as a result of climate shocks, particularly in communities with pre-existing health conditions and/or lower incomes.

- Although all neighborhoods in Bellevue are expected to experience similar exposure to the evaluated climate impacts, historic and current zoning and development patterns leave certain areas more vulnerable to impacts than the city as a whole. West Bellevue, Wilburton, Lake Hills, and West Lake Sammamish are at higher risk of displacement. Bridle Trails, Northeast Bellevue, West Lake Sammamish, West Bellevue, Northwest Bellevue, and Cougar Mountain are more at risk of erosion, flooding, and landslides. In addition to other risks, these kinds of geologic hazards can damage roadways, making them temporarily dangerous or impassable. This is an additional point of vulnerability for households in these neighborhoods that are auto dependent (those that are beyond reasonable walking distance to goods and services or transit).
- Broader geographic distribution of neighborhood centers and businesses that provide goods and services, as well as increased proximity to multi-modal and mass transit options, can increase the climate resilience of those areas.
- Bellevue can increase the adaptive capacity of its land use and development sector through its Comprehensive Plan, Shoreline Master Program, critical areas regulations, and other initiatives.

Table 21 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Zoning & Development sector in Bellevue.

TABLE 21 Land Use and Development: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	High	Moderate	High	Extreme heat will impact infrastructure and increase demand for cooling. It could also lead to displacement, particularly in neighborhoods with low tree canopy and high urban heat island effect.
Extreme Precipitation/ Flooding	Moderate-High	Moderate	Moderate-High	Extreme precipitation can cause flooding, erosion, and landslides, which is expected to damage infrastructure and housing, particularly in areas located on steep topography or close to shorelines. Highly auto-dependent neighborhoods may experience greater impacts if transportation infrastructure is damaged during extreme weather events.
Stream Temperature	N/A	N/A	N/A	No significant impacts projected.
Drought	Low	Moderate-High	Low	Green infrastructure and urban landscaping, including the city's tree canopy, are expected to be impacted by drought.
Wildfire Smoke	Low-Moderate	Moderate	Low-Moderate	Smoke is projected to impact the entire city and could lead to displacement in communities with low resources and pre-existing health conditions.

SOURCE: BERK 2023

3.8 Transportation

3.8.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for the Transportation sector in Bellevue. Bellevue relies on a robust transportation system comprised of

infrastructure that supports walking, bicycling, transit, and driving. Transportation investments and services in Bellevue are guided by the Transportation Element of the Comprehensive Plan, the goal of which is “to improve all mobility options so that everyone in Bellevue has a safe, comfortable, and efficient experience on their preferred mode while encouraging and transitioning to more environmentally and fiscally sustainable modes.”

ASSETS – TRANSPORTATION

Bellevue is connected to the region by Interstate-90, Interstate-405, and State Route-520 highway systems, which are all operated by the Washington State Department of Transportation. Additionally, the city is also served by regional trails including the I-90 Trail along the Mountains to Sound Greenway, and the SR-520 Trail, which are within Washington State Department of Transportation right-of-way and are maintained by the city of Bellevue. Eastrail is a new north-south multipurpose trail through Bellevue that is being developed in stages by King County and Sound Transit. King County Metro and Sound Transit jointly operate 42 bus routes that include at least one stop in Bellevue, which connect the city to Seattle, other cities on the Eastside, and all parts of King County. Sound Transit will provide light rail service in 2024/2025 with six stations in Bellevue with connections to Redmond and Seattle.

Local resources reviewed for this section include the following:

- [City of Bellevue Comprehensive Plan – Transportation Element](#) (City of Bellevue Community Development 2022)
- [2022–2033 Transportation Facilities Plan](#) (City of Bellevue Transportation Department 2022)
- [Eastgate Transportation Study](#) (City of Bellevue Transportation Department 2019)
- [Downtown Transportation Plan](#) (City of Bellevue Transportation Department 2013)
- [City of Bellevue Bike Map \(Choose Your Way Bellevue 2020\)](#)
- [Environmental Stewardship Plan](#) (City of Bellevue Community Development 2020a)

3.8.2 Potential Impacts

Of the projected climate change impacts facing the city, the transportation sector is expected to be most vulnerable to increasing air temperature variability and extreme temperature events, increasing heavy rainfall and extreme precipitation, and increased flood events.

- A recently completed King County project to map heat impacts across the county revealed that downtown Bellevue experiences high heat impacts due to limited vegetation and high density of buildings and infrastructure. The Bellevue Transit Center is located in downtown Bellevue; during extreme heat events, transit users may be susceptible to higher temperatures in this area (King County 2022).
- Extreme heat events, such as the heatwave of June 2021, can impact transportation services in Bellevue. While passengers riding in air-conditioned personal vehicles and transit busses and trains may be minimally impacted, individuals who rely on active transportation modes such as walking or bicycling (including those short walk/bike trips to/from transit) are disadvantaged during such events when the

heat poses risks to health and safety. Additionally, extreme heat in 2021 led Sound Transit to slow its trains to maintain safe operating conditions as the heat caused rails to expand and overhead power lines to lose tension. Elsewhere in the region the extreme heat caused sections of roadways to buckle, resulting in road closures and delays (Crowe 2021).

- Overall, the challenges presented by increasing air temperature variability and extreme temperature events present moderate challenges to the transportation sector in Bellevue. While snow, ice, and extreme heat threaten public safety and may cause transportation delays, the impact of these events is typically short-lived. However, as extreme heat events become more common in the future, they will pose more frequent challenges to the city.
- Increased rainfall and extreme precipitation events will present challenges to transportation infrastructure throughout Bellevue. One such impact may be an increase in sinkholes causing road damage, road closures, or the disruption of transit service. In September 2022, segments of Interstate-405 were closed to repair the freeway's drainage system after a 15-foot-deep sinkhole was discovered adjacent to the freeway. This repair required the closure of the freeway for 23 hours in both directions, resulting in significant delays and disruptions for those traveling through Bellevue. The impacts of sinkholes caused by heavy rainfall are significant, and depending on their location, have the potential to alter transportation options for a large number of individuals (Sullivan 2022).
- Increased rainfall and precipitation may also lead to increased mudslide events throughout the city, particularly in areas with steep slopes. Certain geologically hazardous areas of Bellevue may be susceptible to landslide events given the significant amount of rainfall the city receives and its hilly terrain. During prolonged periods of precipitation, areas prone to erosion or landslide due to soils and geological conditions may become unstable and result in landslides, which can damage properties, and may also block roads and other transportation corridors. In 2012, heavy rainfall resulted in a landslide that closed a section of West Lake Sammamish Parkway for nearly nine weeks (Levy 2012).
- Increased precipitation and heavy rainfall events also lead to localized urban flooding, which can result in significant impacts to roads and other transportation corridors. In December 2019, extreme rainfall flooded many roadways in Bellevue including Southeast Seventh Place, which was inundated with four feet of standing water. Apart from closures and alternate routes, flooding and standing water also pose safety concerns for transportation as cars become susceptible to hydroplaning. Roadway flooding, especially on a large scale, can limit the movement of emergency services and first responders, hindering their ability to respond to accidents and other emergencies (MyNorthwest 2019).
- Overall, flood events pose a moderate risk to the transportation sector in Bellevue. Similar to extreme temperature events, the impacts associated with floods are typically isolated and short-lived. However, like the impacts associated with increased precipitation and landslides, the location of flood events is important in evaluating their impacts on transportation resources. Additionally, existing resources such as FEMA Flood Maps and other geospatial analyses have provided managers with information about areas most susceptible to flooding, which can be used to help guide planning efforts.
- Some climate-driven challenges to the transportation sector may be viewed in the context of existing vulnerability to extreme winter weather and cold temperatures. In February 2019, a winter storm resulted in 2-3 inches of snow in lower elevations of the city and between 6-8 inches in areas of higher elevation. This snow, combined with below-freezing temperatures, made travel throughout the city difficult. Snow clearing was prioritized for major arterial streets leaving travel on public streets within

low-volume residential areas, less traveled routes served by public streets, sidewalks, and bicycle lanes more difficult. Additionally, transit services were reduced and operated on designated snow routes, which substantially reduced the number of stops serviced (City of Bellevue 2019a).

- In December 2022, freezing rain led to substantial disruptions to transportation corridors throughout Bellevue. Untreated public roadway surfaces, sidewalks and bike lanes became nearly impassable, particularly in areas with steep terrain. Additionally, all transit services were cancelled for several hours due to roadway conditions (Westside Seattle 2022). High winds associated with winter storm events have impacted roads throughout the city. In 2019, several arterial streets were temporarily closed due to downed trees, power lines, and other debris (City of Bellevue 2019b).
- As the transportation sector electrifies, it may become increasingly vulnerable to potential climate impacts on energy infrastructure, described in Section 3.1.2. Reduced electricity generation capacity due to extreme heat and drought, as well as direct physical damage from extreme heat, more intense winter storms, and wildfire, could impact the charging infrastructure network that electric vehicles depend on.

3.8.3 Adaptive Capacity

Adaptive capacity for the transportation sector is its ability to withstand climate shocks and recover rapidly from climate impacts. There are several policies, programs, and other measures currently in place to help Bellevue adapt to the challenges presented by climate change to the transportation sector. Broadly speaking, the short-term response capacity of most transportation infrastructure is limited, given the need for large capital investments, which require funding, design, stakeholder engagement, and construction over long periods of time. This makes planning for future climate scenarios more viable for transportation infrastructure, but possibly makes responding to and recovering from severe short-term climate-related events and damages more challenging.

- In 2022, the City of Bellevue began development of a web-based mapping tool for residents and those who work in the city to see which streets have been plowed and the location of snowplows in near real time during winter weather events (<https://bellevuewa.gov/winter-response-map>). This map can be used by individuals to help identify recently treated roads before they travel through the city. Currently, the map displays data for primary and secondary arterial streets but will be developed to include all routes serviced during winter weather events. This type of public information tool could also be used to inform residents of impacts to transportation infrastructure from weather-related events such as extreme heat, windstorms, and flooding, and also damage from earthquakes.
- In 2022, several King County departments began working together to develop an Extreme Heat Mitigation Strategy to help coordinate a response by the county to extreme heat events. As part of the development of this strategy, King County Metro Transit is using information from heat mapping exercises to inform the design of bus stop structures and amenities to provide relief for transit users during extreme heat events, particularly at stops serving disadvantaged communities. Similarly, the county launched a [3 Million Trees](#) initiative to grow the urban tree canopy, which will provide relief to transit users, bicyclists, and pedestrians during heat events (King County 2022).
- Adaptive capacity can be increased by incorporating best available science as it relates to projected future precipitation patterns and volumes into codes and regulations concerning geologic hazard areas

when they are updated; specifically, slopes susceptible to erosion or landslide above or adjacent to transportation infrastructure.

- In its 2022-2033 Transportation Facilities Plan, the City of Bellevue has outlined several road projects intended to help manage stormwater, drainage, and flow diversion to minimize impacts from urban flooding. Additionally, the City of Bellevue has taken steps to plant greenspaces and gardens in areas of the city to help mitigate the impacts from increased stormwater during heavy precipitation events. This type of natural flood protection can also provide habitat while increasing green space, enhancing adaptive capacity in multiple sectors.

3.8.4 Vulnerability Summary

Changes to transportation systems that increase adaptive capacity by meaningfully shifting travel patterns and behaviors typically require large capital investments and long planning, design, and construction timelines. The investment and time required limits the adaptive capacity of the transportation sector in Bellevue in the short term, making it highly vulnerable to climate change. The primary impacts that present the greatest risks to transportation include increasing air temperature variability and extreme temperature events, increasing heavy rainfall and extreme precipitation, and increased flood events. The consequences of these impacts will depend on duration (e.g. extreme heat impacts can be highly disruptive but are typically short lived) and space (e.g. disruption or damage to freeways and arterial routes are more impactful to the transportation needs of city residents and commuters).

Certain areas of Bellevue, such as downtown, Wilburton, and BelRed, currently experience some degree of urban heat island effect and have comparatively lower tree canopy. Users of transit infrastructure that is located in these areas may therefore be more exposed to extreme heat events. Due to short wait times, access to nearby buildings with air conditioning, and integral shading of waiting areas, this is expected to be a relatively minor aspect of overall vulnerability.

Low-lying roadways and other transportation infrastructure, as well as those built on or near steep slopes, are susceptible to flooding and erosion from extreme precipitation events. Similar to most of the region, Bellevue's transportation sector is vulnerable to winter storms. High wind speeds can damage trees and block infrastructure, while snow and ice can lead to road closures and transit service shutdowns.

Through regular maintenance and targeted new transportation infrastructure investments, the city of Bellevue can increase the adaptive capacity of its transportation sector and lower its vulnerability to climate impacts.

Table 22 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Transportation sector in Bellevue.

TABLE 22 Transportation: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	Moderate-High	Low-Moderate	High	Extreme heat may damage transportation infrastructure; although these impacts are generally short-lived, they may occur with increasing frequency. Adaptive capacity may be limited by the expense and long time horizon of infrastructure updates.
Extreme Precipitation/ Flooding	High	Moderate	High	Extreme precipitation is expected to increase risk of landslides, flooding, and sinkholes that could disrupt transit services, close roads, and damage infrastructure. Adaptive capacity can be increased by incorporating climate projections into regulation and code updates, and through use of real-time system information tools.
Stream Temperature	N/A	N/A	N/A	No significant impacts projected.
Drought	Low	Moderate	Low	No significant direct impacts projected. See Ch. 3.1 for discussion of impacts to energy infrastructure that may impact transportation as the sector electrifies.
Wildfire and Wildfire Smoke	Low	Low	Low	No significant direct impacts projected. See Ch. 3.1 for discussion of impacts to energy infrastructure that may impact transportation as the sector electrifies.

SOURCE: ESA 2023

3.9 Utilities (Solid Waste, Wastewater, and Stormwater)

3.9.1 Sector Overview

This section identifies assets, potential impacts associated with climate change, and vulnerabilities for utilities in Bellevue, including waste, wastewater, and stormwater in Bellevue. As Bellevue has grown over the past decades, it relies on a complex utilities infrastructure system and services to provide residents and businesses with materials recycling and disposal as well as wastewater and stormwater management:

- The City of Bellevue contracts with Republic Services for garbage, recycling, and compost services. The Utilities Department administers programs and other initiatives to educate residents and business owners about environmentally friendly waste management practices.
- The Utilities Department manages a stormwater system that consists of streams, lakes, wetlands, pipes, catch basins, and flood control sites all of which drain into either Lake Washington or Lake Sammamish. The Utilities Department leads initiatives and projects that provide flood control, protect water quality, and enhance and protect natural habitats.
- Wastewater is managed by the Wastewater Division, which oversees the city's wastewater collection system that connects to the King County regional sewage system where it is treated according to state and federal water quality standards. The City of Bellevue's wastewater service area covers over 37 square miles and includes maintenance holes, mainline pipes, and pump and flush stations.

This section provides an overview of potential impacts expected as a result of climate change and their connection to waste management infrastructure in Bellevue.

Local resources reviewed for this section include the following:

- [Wastewater System Plan](#) (Bellevue Utilities 2015)
- [Storm and Surface Water System Plan](#) (Bellevue Utilities 2016)
- [Business Profile](#) (Bellevue Utilities 2021)
- [Sustainable Bellevue Environmental Stewardship Plan](#) (Bellevue Community Development 2020a)

3.9.2 Potential Impacts

Bellevue's Utilities sector is projected to be most vulnerable to increasing heavy rainfall events and increased flooding. Higher air temperatures and extreme weather events are also impacts of concern for this sector; wetter winter weather conditions, extreme heat, and wildfire smoke have the potential to temporarily disrupt service provision when conditions outdoors are unsafe for workers.

- Some climate-driven challenges to this sector may be viewed in the context of existing vulnerability to cold temperatures and winter weather conditions, which can impede garbage, recycling, and compost collection, resulting in cancellation or delay of services. During the freezing rain event of December 2022, service was suspended for two days (KOMO News 2022). Areas accessed by roadways with steep slopes are most at risk of service disruption. Overall, impacts from such events present a minimal risk to waste management operations since they are usually short-lived.
- Uncertainty surrounding the specifics of changes to future rainfall amounts is a primary obstacle for future planning. Potential changes in the intensity and timing of rain events will have dramatic implications for stormwater management as well as potential changes to the biology and chemistry of receiving waterways.
- Increasing extreme precipitation events will present many challenges to flood control initiatives led by the Utilities Department. Most of the precipitation in Bellevue occurs during the winter months. While water can be absorbed by soils, there is less plant uptake during winter.

- With increasing winter precipitation, and with that precipitation falling in fewer, more concentrated events, the capacity for soil absorption will be limited, resulting in more stormwater and increased flood risk, requiring the Utilities Department to increase its capacity for stormwater management. Heightened flood risk may limit the ability of existing stormwater management features to abate flood risk and increase the capacity demands put on aging infrastructure.
- Aging and/or undersized infrastructure also poses significant challenges to stormwater management in the face of climate change. The average age of drainage assets in Bellevue is 45 years and with increased rainfall, this infrastructure may be unable to adequately handle increased flows. This system was built to handle typical light rainfall expected in Western Washington; however, as more intense rainstorms occur, the stormwater system in Bellevue may become overwhelmed (Buranen 2017).
- Specific areas of Bellevue are more at risk from flood events than others. For example, a portion of stormwater flows into Lake Washington at Lower Coal Creek; however, the creek is restricted to a narrow channel that flows through a residential neighborhood. Flows associated with 100-year storms or increased precipitation during winter months as a result of climate change could impact the creek's levees and place adjacent homes at risk of flooding.
- Between 1986 and 2006, Bellevue lost 20% of its tree canopy cover, due to development of previously undeveloped areas in the city and annexation of new areas. Since then, the city's tree canopy has grown from 36% in 2007 to 39% in 2019. Despite the overall growth in canopy in recent years, certain neighborhoods have experienced losses in overall canopy. The loss of mature trees presents obstacles to flood management as less mature forests and trees absorb less water during and before flood events.
- Increased flooding will present risks to homeowners and demand larger and more comprehensive flood management systems. Fortunately, extensive flood mapping data exists for the city, which will help resource managers identify and prioritize areas in need of infrastructure upgrades and other initiatives.
- Septic systems in Bellevue are at risk of failure or reduced capacity from flood events. Floodwater can damage septic systems and fully saturate soils in the system's drain field.
- The Wilburton Pump Station, part of the King County Wastewater Treatment System, is located within the Regulatory Floodway as identified by the Federal Emergency Management Agency. Pump station infrastructure could become damaged during flood events. Flood events also pose risks for sanitary sewer overflows, which occur when sewage from city-owned assets reaches storm drains or waterways and poses public health and environmental threats. The City of Bellevue has an established goal of 4 or fewer overflows per 100 miles of pipe each year.

3.9.3 Adaptive Capacity

Adaptive capacity for the Utilities sector is the ability of the city's complex utilities systems to continue to function through climate events and recover quickly from climate-related disruptions.

- In 2022, the City of Bellevue began the development of a web-based mapping tool for residents and those who work in the city to see which streets have been plowed and the location of snowplows in near real-time during winter weather events. This tool could be used by waste management collectors to help prioritize areas in which to collect garbage, recycling, and compost during winter weather

events. This type of public information tool could also be used to inform residents of impacts to waste management from extreme heat and flooding.

- The City of Bellevue is piloting Salmon Safe Certification for the construction of Fire Station 10, and have approved other development projects that were certified under Salmon Safe. This includes the design of landscape features that capture excess stormwater to mitigate flood risk and remove pollutants from stormwater. Bellevue could increase the adaptive capacity of its stormwater management by replicating this project at sites throughout the city.
- In 2016, the City of Bellevue amended its Land Use Code to address the NPDES Phase II stormwater permit, and adopted standards for hard surfaces and pervious surfaces. These updates prioritize strategies for stormwater runoff reduction during and after heavy rainfall events. These changes bolster the adaptive capacity of the Utilities sector during extreme rainfall events.
- The Bellevue stormwater system includes regional detention ponds that can hold water during periods of heavy rainfall and slowly release it. These systems are designed to hold a week's worth of water under normal precipitation intensities, which can provide a buffer to the system during heavy rainfall events (Buranen 2017).
- The City of Bellevue's permit under the National Pollutant Discharge Elimination System requires low-impact development be considered as the preferred method of stormwater management. Low-impact development includes features such as downspouts that flow into planters, or raingardens and swales that help slow the speed of runoff to promote detention and groundwater infiltration (Buranen 2017).
- In the Environmental Stewardship Plan, the City of Bellevue set a target to increase tree canopy to 40% of the city's total area. This would equate to roughly 670 acres of additional tree canopy, or approximately 75,000 new trees compared to the tree canopy in 2017. The tree canopy in 2019 was 39%. Increasing the city's tree canopy will increase the amount of water uptake by plants. During extreme precipitation events, this can provide a buffer to excess stormwater volume and help to limit flood risk.
- The City of Bellevue has a goal of open space preservation throughout the city. In addition to maintaining access to parks and open spaces for residents, open space areas can help to alleviate the damages associated with flood events, particularly when situated in floodplains and low-lying areas. These initiatives are further detailed in the Watershed Management Plan and the Parks and Open Space System Plan.
- The City of Bellevue is enrolled in FEMA's Community Rating System, which means Bellevue residents receive a 25% discount on National Flood Insurance Program policies. This provides added financial capacity for Bellevue residents to respond to and recover from flood events.
- The 2016 Storm and Surface Water System Plan reports few incidences of structural flooding between 1996 and 2011 and identifies 11 street locations that are commonly at risk of flooding during large storms. Flooding due to debris is a recognized concern at 64 city-owned drainage facilities. As extreme precipitation occurs more frequently than it has historically, structural flooding will increase. The City of Bellevue has established a goal of no more than five occurrences of structural flooding in the public stormwater system after heavy rainfall events per year. From 2015 through 2020, Bellevue recorded only 12 such events, all of which took place in 2019. ([Utilities Performance | City of Bellevue \(Metric 4\)](#))

- The City of Bellevue has recently completed stream health assessments of all major open streams, to inform the development of the Watershed Management Plan. The Watershed Management Plan will guide City efforts to improve stream health by prioritizing investments in high-impact areas that will lead to measurable benefits over short time horizons. The City has advanced several stream restoration projects underway, including the acquisition of eight acres in BelRed for future restoration efforts. Restored streams can mitigate the impacts of extreme precipitation events by providing stormwater management and flood control.
- The City of Bellevue has also identified several green stormwater infrastructure projects in its Capital Improvement Plan to expand pervious surfaces, facilitate rainwater catchment, and reduce the flow of stormwater runoff to limit water pollution. Reducing impervious surfaces and increasing tree canopy and infiltration sites for runoff could also reduce temperatures in some areas.
- The Storm and Surface Water System Plan and Wastewater System Plan outline the approach to stormwater and wastewater management through a series of stated policies. These plans also include adaptive management to identify how environmental and operations monitoring data can be used to adjust and reframe policies of the programs.
- The City of Bellevue regulates runoff that can load nutrients and pollutants into water bodies but is limited in its ability to regulate runoff from developments that pre-date current stormwater regulations.

3.9.4 Vulnerability Summary

Overall, climate change poses moderate risk to Bellevue's Utilities sector. Many of the direct services provided by the City of Bellevue (e.g. garbage, recycling, and compost collection) will be minimally impacted by climate change. However, large-scale elements of the Utilities sector such as stormwater management and flood control may be impacted by climate change to a greater degree. The effects of climate change will be felt throughout the city, and building capacity will be critical to help managers identify and prioritize adaptation efforts. Of the evaluated impacts, Bellevue's Utilities sector is most vulnerable to extreme temperature variability, intense rainfall events, increased winter precipitation, and flooding. It is expected to be less impacted by, but still vulnerable to, drought events, particularly when drought occurs in combination with extreme heat.

Vulnerability to extreme heat and drought is expected to be evenly distributed throughout the city. However, some areas in Bellevue are more vulnerable to flooding than others, particularly the residential area around Lower Coal Creek, which is restricted to a narrow channel in this area. Flows associated with 100-year storms or increased precipitation during winter months as a result of climate change could impact the creek's levees and place adjacent homes at risk of flooding.

Table 23 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Utilities sector in Bellevue.

TABLE 23 Utilities: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	Moderate-High	Moderate	Moderate-High	Extreme temperature variability / extreme heat has the potential to temporarily disrupt service provision when conditions outdoors are unsafe for workers.
Extreme Precipitation/ Flooding	High	Moderate	High	Increased winter precipitation and extreme precipitation events year-round are expected to cause damage and service disruption. Adaptive capacity can be increased by changes to stormwater management and other programs.
Stream Temperature	N/A	N/A	N/A	No significant impacts projected.
Drought	Low	Low-Moderate	Low	Prolonged drought can stress vegetation, potentially causing loss of trees and other vegetation. This can in turn impact flood management, as less mature forests and trees absorb less water during and before flood events.
Wildfire Smoke	Low	Moderate	Low	Wildfire smoke has the potential to temporarily disrupt service provision when conditions outdoors are unsafe for workers.

SOURCE: ESA 2023

3.10 Water Resources

3.10.1 Sector Overview

Water resources play a vital and diverse role in Bellevue: as drinking water, recreational resources, habitat, and a critical utility for emergency functions such as medicine and firefighting. The city, as well as other incorporated and unincorporated areas in the Bellevue Water District, receives water through the Cascade Water Alliance, which contracts with Seattle Public Utilities. Bellevue receives its water via two supply lines: one from a reservoir on the South Fork Tolt River and one from a reservoir on the Cedar River. The city operates and maintains the water distribution system, including its pipes, reservoirs, pump stations, and hydrants. Climate change may have direct impacts on water resources and/or cause changes to the environment that drive impacts to water resources, all of which can affect water quality, quantity, natural

drainage systems, and aquatic resources. Climate change may also impact the functionality of drinking water system infrastructure, potentially affecting utility service.

Local resources reviewed for this section include the following:

- [City of Bellevue Habitat and Watershed Assessment Reports](#) (e.g. [Vasa Creek](#), [Kelsey Creek](#), [Lake Sammamish](#)) (City of Bellevue Utilities 2018-2020)
- [Water Shortage Contingency Plan](#) (Seattle Public Utilities 2018)

3.10.2 Potential Impacts

Climate change impacts of concern for water resources include increased air temperatures and extreme heat, extreme precipitation events, increased water temperatures in lakes and streams, and drought.

- Elevated energy demand, particularly during extreme heat events, may result in power outages that impact the water distribution system. Most pump stations either have a backup generator onsite or inputs for portable generators, which have enabled uninterrupted service throughout the longest power outages in Bellevue. However, many historical power outages have occurred during winter storms when demand is lower. Heightened water demand during heat waves could strain the backup power system for pump stations or require more frequent maintenance to keep it running.
- Extreme precipitation can increase the risk of landslides. Landslides can deposit sediment and debris into water bodies, which may disrupt habitat or other critical areas. The Factoria, Forest Hills, and Parksite Reservoirs could be vulnerable to structural damage or impacts to water quality due to their locations in relation to landslide hazard areas. Landslides may also damage supply lines from drinking water resources, but these areas are outside of Bellevue's jurisdiction and are the responsibility of Seattle Public Utilities.
- Increased precipitation will result in more polluted runoff entering water bodies. In addition to degrading water quality, heavy metals and other pollutants in runoff can kill aquatic species. Stormwater runoff provides a more frequent and consistent input of pollutants into water bodies, but flood events can inundate areas with hazardous materials or debris that would otherwise be kept out of water bodies, which can severely impact aquatic and riparian habitat.
- Extreme precipitation events, especially back-to-back events can overwhelm the capacity of water resource infrastructure, such as culverts, which can lead to overtopping of roads or inundating adjacent properties.
- Runoff from roadways can increase stream temperatures in tributaries and lakes to the east and west of the city. Increased water temperatures and eutrophication are expected to cause more frequent and bigger algae blooms. Algae blooms can kill aquatic life by severely reducing dissolved oxygen in water. Waterborne pathogens, such as *Legionella* and *E. coli*, also pose a threat to water quality and human health, as these pathogens may thrive in warmer water temperatures or due to high levels of nutrients from runoff. Bellevue's water is sourced from protected forested watersheds on the Tolt and Cedar River, which limits the potential for severe impacts to the water from algae blooms, though some impact is still likely. Algae blooms have occurred in the Cedar River water supply, which is unfiltered, but can be treated. The protected watershed prevents significant nutrient loading that drives algae blooms; as such, historic occurrences of algae blooms in the water supply have had limited impacts.

- Water shortages can occur from climate change through decreased snowpack that feeds Bellevue's primary drinking water supply and extended periods of hot temperatures and dry weather. Preliminary scenario assessments by Seattle Public Utilities found that climate change impacts to water supply could vary significantly, with projections for 2050 ranging from a zero to 50% reduction in supply. Water levels in the drinking water supply reservoirs are kept low in the winter for flood storage, but dry springs and summers will result in higher water levels not being restored. A multi-year drought is unlikely, but early stages of the Seattle Public Utilities Water Shortage Plan have been implemented during single-year droughts, the worst being in 2015.
- Droughts, as well as changing precipitation patterns, could reduce Bellevue's emergency groundwater supplies from wells. Pumping from the wells during water supply emergencies impacts surface water availability. If emergency water supplies were needed for 100 days, the surface water in Kelsey Creek could be depleted, which would impact salmon and aquatic species and habitat. Restoration of streamflow would be especially hindered during a drought.
- In general, Bellevue's municipal water supply is somewhat drought-resilient given that it comes from Seattle Public Utilities reservoirs, which are less impacted by drought events and declarations. However, as summers continue to warm and periods of drought are more frequent, the city will face challenges related to regular maintenance and other activities that require the use of water.
- Increases in wildfires increase the risk of ash and dissolved organic matter entering drinking water, which increases treatment costs. Dissolved organic matter produced from fire has different chemical characteristics than dissolved organic matter under natural conditions and can require different approaches to water treatment. Burned dissolved organic matter can be flushed into water supplies in large quantity from post-fire rain events. This increases turbidity of water and total suspended solids, which can reduce dissolved oxygen and kill aquatic resources that help to maintain clean water. The most likely impact would be increased costs to Bellevue for water treatment.

3.10.3 Adaptive Capacity

Adaptive capacity for Water Resources is the ability of the city to continue to supply sufficient, uncontaminated water to residents throughout climate impact events, and without significantly impacting the watershed and aquatic ecosystems.

- The City of Bellevue assesses water resource conditions on a recurring basis to monitor the effects of implementing various watershed management, habitat improvement, and stormwater management initiatives. The city has done this with basin-specific habitat assessments, the Storm and Surface Water System Plan, and Stormwater Management Plan, in addition to annual reports on water quality, municipal stormwater permit compliance, and performance from relevant departments.
- The City of Bellevue protects and restores water resources, riparian areas, and surrounding natural resource buffers, in order to preserve water quality, habitat, and ecological functions.
- While the City of Bellevue can directly enforce critical area ordinances and regulate activities that are impacting the environment, it has limited ability to monitor critical areas on private land or direct property owners on how to manage their land beyond regulated activities.

- The City of Bellevue has built hazard-resilient drinking water facilities, such as the Horizon View 2 Reservoir and Pike Peak Reservoir Replacement, which can reduce risks of exposure to landslides.
- The City of Bellevue has added backup power equipment at pump stations and other utility facilities to ensure service through power outages. Improvements that included adding backup power have been pursued at multiple Horizon View and Cougar Mountain pump stations.
- The Bellevue Parks and Community Services Department has developed best management practices and design standards to guide the conservation of natural resources. This includes information related to native tree and vegetation plantings in city rights-of-way to limit the need for water during periods of drought. Additionally, the document includes information about upgrading irrigation systems to more efficient models.
- The City of Bellevue Utilities Department developed the Emergency Water Supply Master Plan, which anticipates the impact of natural disaster on the city's water supply and recommends mitigations. The City can increase the adaptive capacity of its water resources by incorporating climate impacts into the Emergency Water Supply Master Plan and developing mitigation actions and investment levels to improve the climate resilience of its water systems (City of Bellevue Utilities 2023).
- Bellevue Utilities is also upgrading water meters to improve leak detection and updating building standards to specify water-efficient plumbing fixtures to optimize indoor and outdoor consumptive use. Increased water availability improves adaptive capacity in water management.
- In late summer 2015, Bellevue and the greater Puget Sound Region experienced drought due to historically low precipitation and high temperatures. The cities of Seattle, Everett, and Tacoma created a regional agreement with a goal of reducing water use by 10%. As part of this effort, Bellevue Utilities limited routine maintenance activities that require the use of water, instead postponing them until October and November of that year. This included flushing of water mains and other work. Additionally, Bellevue Fire limited their training drills that required water. Regional water management agreements of this kind may become more necessary as summer drought conditions become more common and more extreme.

Flood Risk in Lake Washington

Recent modeling¹ suggests that the Washington coast could see as much as four to six inches of sea level rise by 2050, and potentially nearly three feet by the end of the century. Extreme precipitation events are expected to increase, delivering a greater volume of water into streams and rivers that feed into Lake Washington. What would these impacts mean for flooding risk on the lake?

Not much, it turns out, at least for this century. According to the U.S. Army Corps of Engineers², who operate the Ballard Locks, Puget Sound would have to be at least 6.6 feet higher for properties on Lake Washington to potentially flood – more than twice the 2100 projection from NOAA.

The locks help to maintain a constant water level in Lake Washington by releasing water into the Sound. The lake level is maintained at roughly 20 feet above the Puget Sound mean low tide. This means that even after extreme precipitation events, when high streamflow carries greater-than-usual volumes of water into the lake, flood risk is mitigated by releasing that extra volume through the locks.

1. [2022 Sea Level Rise Technical Report](#), NOAA.
2. [Letter to the Seattle Times](#), 2017.

3.10.4 Vulnerability Summary

Bellevue’s Water Resources sector is expected to be vulnerable to all the evaluated impacts. Many of the water resources that could potentially be impacted by climate change are outside of or only partially within the City’s jurisdiction, which limits its ability to minimize some of these impacts on its own. Coordinating with other municipalities and entities will play a large role in increasing the adaptive capacity of this sector, especially to drinking water supply sources, Lake Washington, and Lake Sammamish. However, local impacts from stormwater runoff and degraded natural resources can be addressed by the City of Bellevue.

Although the impacts of extreme heat, increased stream temperature, drought, and wildfire smoke are expected to be evenly distributed throughout the city, water quality impacts from extreme precipitation events and the risk of potential landslides are greater for the Factoria, Forest Hills, and Parksite Reservoirs.

Table 24 presents potential impacts, adaptive capacity, and overall vulnerability scores for the main climate-driven factors of concern for the Water Resources sector in Bellevue.

TABLE 24 Water Resources: Potential Impacts, Adaptive Capacity, and Vulnerability Scores

Impact Category	Potential Impacts (Low, Moderate, High)	Adaptive Capacity (Low, Moderate, High)	Vulnerability (Low, Moderate, High)	Summary of Vulnerability
Air Temperature/ Extreme Heat	Moderate	Low-Moderate	Moderate	Extreme heat events may strain the electrical grid, leading to power outages that impact water distribution systems and strain backup power for pump stations.
Extreme Precipitation/ Flooding	Moderate-High	Low-Moderate	Moderate-High	Extreme precipitation and resultant landslides can impact water quality and damage water distribution infrastructure, as well as sensitive critical areas. Resultant flooding and runoff can introduce pollutants to Bellevue’s water resources.
Stream Temperature	Moderate	Low-Moderate	Moderate	Increased stream temperature can cause harmful algae blooms and increase the presence of pathogens in water sources.
Drought	Moderate	Low-Moderate	Moderate	Drought is expected to impact water availability, including Bellevue’s emergency groundwater supply.
Wildfire	Moderate	Low	Moderate	Dissolved solids and other pollutants from wildfires and smoke can pollute water sources, increasing water treatment costs.

SOURCE: ESA 2023

Strategies & Next Steps

4.1 Climate Resilience Strategies

While the focus of this report is on identifying climate-related vulnerabilities posed to sectors of concern in Bellevue, the consultant team also identified some potential resilience measures for consideration, including a suite of recommended strategies for consideration in departmental programs and projects. This section describes those strategies organized by associated sectors (i.e. those with similar vulnerabilities and needed responses). Many of these are listed as high-performing measures in the Washington State Department of Commerce Model Climate Element Menu of Measures (April 2023). Strategies were also sourced from the K4C Climate Action Toolkit and from other regional climate change plans.

Buildings & Energy, Economic Development, Land Use & Development

- Minimize power outages from the local electric utility during extreme weather events by identifying and protecting critical energy facilities.
- Encourage facility owners to develop decentralized power generation and fuel flexibility capabilities.
- Increase energy efficiency across all sectors through education, efficiency retrofits, and building management systems, and increase access to air conditioning through the provision of heat pumps in new construction and retrofits.
- Increase solar readiness for new residential and commercial buildings.
- Ensure backup power generation for critical facilities and identified key infrastructure during power outages.
- Support retrofits to public facilities for energy efficiency, on-site renewable energy generation, and electrification of building energy systems.
- Encourage use of reflective surfaces (“cool paving” or “cool roofs”) in public and private projects (e.g., parking lots, streets, sidewalks, etc.).
- Install energy-efficient equipment and water-saving fixtures during renovations in city-owned buildings.

- Encourage best practices and/or sustainability certifications to optimize sustainability of public building and infrastructure projects, to increase resilience (e.g. LEED, Envision Rating System – Institute for Sustainable Infrastructure, Passive House, etc.).
- Promote green jobs and invest in a resilient economy as directed by Bellevue’s Economic Development Plan and Sustainable Bellevue: Environmental Stewardship Plan (e.g., support contractor training for energy efficient equipment installation).
- Support local businesses’ efforts to generate and store renewable electricity on-site, which can provide back-up power during emergencies and help ensure continuity of operations.

Cultural Resources & Practices, Ecosystems

- Engage local/regional Tribes and community groups to identify and protect historic and cultural sites and heritage that may be acutely sensitive to climate hazards such as flooding (e.g. raising, retrofitting, relocating structures; protecting native species).
- Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and ways that the community can prepare and build resilience to these changes.
- Enhance urban tree canopy initiatives and use shade trees (e.g. canopy-forming trees) in all city projects, and require the use of shade trees in connection with private development projects where feasible.
- Develop a comprehensive list of plant and tree species known to have a broad range of environmental tolerances (e.g. heat, drought, pests, and disease), and adopt standards to require their use.
- Manage local forest health to reduce susceptibility to drought stress, pests, and diseases and plant trees that are compatible with future climate conditions.
- Preserve and enhance natural ecological functions and values provided by critical areas to help mitigate the long-term impacts of climate change. Consider the projected impacts of climate change on those critical area functions and values when creating plans or strategies to protect and/or restore them.
- Work with private property owners to build resilience of critical areas to the impacts of climate change.
- Install water-saving equipment and monitoring technology to reduce water use in parks and streetscapes to conserve water during droughts (e.g. smart irrigation systems and sensors).

Water Resources, Utilities

- Increase capacity of stormwater systems to manage increases in precipitation and higher peak flows.
- Update/revise flood maps to ensure the City’s floodplains are accurately mapped (i.e. actual water bodies and topography) and that flood elevations are consistent.
- Educate residents and businesses about the benefits and appropriate uses of local water supplies (including recycled water and onsite water reuse systems) and further integrate recycled water (if available) and onsite water reuse systems into new development and redevelopment plans.
- Encourage projects that capture and reuse stormwater onsite.

- Encourage use of permeable pavement in non-critical areas such as low-use roadways, sidewalks, parking lots and alleys where soils, topography, light penetration, and other factors permit proper drainage.
- Ensure all water and wastewater pumping stations have off-grid, onsite energy sources and/or reliable backup power sources by increasing the number of backups and pulling electricity from different grids.
- Minimize pollutant loads and improve quality of stormwater runoff to help keep streams, lakes and other waterbodies clean.

Emergency Management, Human Health

- Increase local access to and production of healthy and affordable foods to reduce stress and capacity constraints during extreme events.
- Ensure that emergency response plans incorporate climate impacts, to better protect staff, infrastructure, and facilities during emergencies and extreme weather events.
- Improve indoor air quality through advanced monitoring and filtration systems in public facilities, commercial buildings, multifamily housing, and single-family homes.
- Evaluate, improve, and build redundancy into all public and inter-agency warning and communication systems.
- Conduct planning to identify evacuation routes and modes for effective transport during emergency situations.
- Build and foster community connections and resilience through neighborhood programming and outreach, and incorporate climate resilience into neighborhood oriented communication and programming.
- Explore the creation and implementation of community-based Resilience Hubs to provide support during and after extreme events.
- Support vulnerable populations during wildfire smoke events and high heat events.
- Develop strategies to support the homeless population during extreme weather events.

Transportation

- Prioritize infrastructure upgrades for streets at risk of flooding.
- Raise streets in flood-prone areas, while ensuring no rise of the base flood elevation or impacts to fish and wildlife habitat areas.
- Implement a repaving strategy that reduces heat-related damage to asphalt and incorporates maintenance and operations that extend the life of the road surface.
- Employ deicing strategies and materials that are effective in extreme cold temperatures and prolonged freeze events to stabilize roadway and bridge surfaces, while ensuring no impacts to fish or other aquatic species or habitat.
- Collaborate with transit service providers to ensure vulnerable populations are served by transit during extreme weather events or emergencies.

- Increase access to cooling centers, parks, and shorelines through transit and pedestrian/bicycle infrastructure.
- Provide complete and connected infrastructure for walking and biking.
- Ensure backup power for electric vehicle charging for fleets, critical facilities, and publicly accessible charging stations.

4.2 Next Steps

The City of Bellevue has identified a number of possible next steps for leveraging the Climate Vulnerability Assessment findings and recommendations to continue integrating climate change and resilience into city policies, programs, and projects. Many of these next steps will produce additional action items, but those already identified include:

- Review suggested strategies and identify priority actions for implementation, based on vulnerabilities and capacities identified in this report.
- Identify opportunities to integrate report findings into upcoming plan updates, including:
 - Sustainable Bellevue Environmental Stewardship Plan update (2025)
 - Comprehensive Emergency Management Plan update, including the Hazard and Inventory Risk Assessment (2025)
- Inform the Comprehensive Plan Periodic Update, mainly through policy recommendations intended to further integrate climate change and resilience into the CPPU (see Appendix 1),
- Evaluate creating an interdepartmental / interagency Climate Preparedness Team, in close collaboration with King County and other regional partners.
- Conduct a Climate Risk and Resilience Assessment for City-owned buildings and facilities.
- Partner with Emergency Services staff and stakeholders to conduct a Resilience Hub Gap Analysis (use the Resilience Hub model to identify opportunities within existing Emergency Services centers and programming, including in support for / partnership with community centers and organizations)
- Provide training to city staff in implementing climate-resilient best practices for capital project design and construction through the Institute of Sustainable Infrastructure (ISI) Envision framework.
- Identify opportunities and models for community engagement programs specific to vulnerable groups identified in this report, including partnership opportunities through existing programs
- Inventory, prioritize, and model capital investment costs and cost-savings to increase climate readiness, including present cost of non-investment. Integrate analysis into capital improvement planning and budget discussions.

SECTION 5 Appendices

5.1 Appendix 1: Climate Mitigation & Resilience Policy Recommendations

In addition to the climate resilience strategies described in Section 4, the Climate Vulnerability Assessment consultant team also identified a number of opportunities to further incorporate climate mitigation and resilience into the Comprehensive Plan Periodic Update (CPPU). While the focus of this report is on evaluating climate-related vulnerabilities posed to sectors of concern in the city, the consultant team also identified potential resilience measures. These recommendations include existing Comprehensive Plan policies that are responsive to climate change, suggested modifications to those policies to better address climate change, and suggestions for entirely new policies.

This appendix presents these policy recommendations organized by the same associated sectors used in Section 4:

- Buildings & Energy, Economic Development, Land Use & Development
- Cultural Resources & Practices, Ecosystems
- Water Resources, Utilities
- Emergency Management, Human Health
- Transportation

The policy recommendations presented in this report—whether addition, modification, or deletion—are not final and may be further modified by city staff for clarity, consistency, and relevance. These policy recommendations are subject to the same Comprehensive Plan policy review and vetting process applied to all policies and policy modifications under consideration for the CPPU, including input from stakeholders, subject matter experts, and city boards and commissions. Any policy revisions resulting from this study will be reviewed and finalized through that process.

5.1.1 Buildings & Energy, Economic Development, Land Use & Development

COMPREHENSIVE PLAN POLICIES AND POTENTIAL MODIFICATIONS

Existing Comprehensive Plan policies are listed below with suggested additions or modifications in ~~strikeout~~ or underline to better address climate change. Suggested additions could be appended to current policies or written as new standalone policies.

- UD-37. Use site design, water efficient landscaping and stormwater management practices to reduce the environmental impact of impervious surfaces.
 - No change.
- ED-11. Provide city leadership and direction to maximize the business retention and recruitment efforts of Bellevue's economic development partners.
 - Add: Implement Bellevue's Economic Development Plan and Sustainable Bellevue: Environmental Stewardship Plan to invest in a resilient economy and promote green jobs.
- ED-22. Support efforts that promote tourism, hotel, retail and arts businesses.
 - Add: Encourage provision of indoor and outdoor spaces that are adapted to climate stressors such as extreme heat (e.g. awnings, tree canopy, green infrastructure) and promote energy conservation measures (e.g. passive cooling design, energy conservation retrofits, etc.).
- ED-24. Cultivate development of diverse, distinctive, well-defined places that invite community activity and gathering. Specifically facilitate the redevelopment and re-invigoration of older neighborhood shopping centers. Work with stakeholders to transform such centers into high quality and dynamic retail/mixed-use commercial areas that also provide a gathering place and sense of community for the neighborhood. Allow for flexibility to repurpose and re-use a variety of building types to accommodate new uses.
 - Add: When redeveloping, encourage shopping centers to become more resilient to climate stressors such as extreme heat and extreme precipitation through installations of green infrastructure, tree canopy, and solar.
 - Add: Develop or modify design standards to integrate exterior building features (e.g. awnings, cool roofs, solar panels) that reduce the impacts of climate change including extreme heat.
- ED-25. Where commercial areas are in decline, work with businesses and other stakeholders to identify corrective actions, which may include:
 - Targeting investments in public infrastructure that may help catalyze new private sector investment, including investments that would increase resilience to climate change.

- ED-30. Facilitate efforts of businesses and institutions to train workers for today's and tomorrow's jobs, including green jobs, and support continuing education in the community.
 - Add: Invest in workforce training that promotes green jobs.
- HS-17. Encourage services that support Bellevue's workforce in maintaining or advancing their employment opportunities.
 - Add: Support job opportunities and workforce education that create a more climate-resilient Bellevue economy.
- LU-20. Support Downtown's development as a regional growth center, with the density, mix of uses and amenities, and infrastructure that maintain it as the financial, retail, transportation, and business hub of the Eastside.
 - Add: Adapt Downtown's streets and buildings to be resilient to climate stressors and reduce vulnerability of Downtown residents, such as with tree canopy, green infrastructure, and building designs promoting renewable energy and energy efficiency.
- LU-21. Support development of compact, livable and walkable mixed-use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
 - Add: Adapt Center streets, parking areas, and buildings to reduce vulnerability to extreme heat and extreme precipitation such as with tree canopy, green infrastructure, and building and site designs promoting alternative heat and cooling for energy efficiency and resilience.
- LU-28.4. Consider a land use incentive system that offers additional floor area in exchange for infrastructure and amenities that contribute to the public good.
 - No change.
- UT-70. Facilitate the conversion to cost-effective and environmentally sensitive alternative technologies and energy sources.
 - Add: Support local businesses' efforts to generate and store renewable electricity on-site, which can provide back-up power during emergencies and help ensure continuity of operations.
- LU-6. Encourage new residential development to achieve a substantial portion of the maximum density allowed on the net buildable acreage.
 - Add: Prioritize middle housing and infill development in residential communities to offer new housing choices and supply and add mixed-use development in high-capacity transit areas.
- LU-20. Support Downtown's development as a regional growth center, with the density, mix of uses and amenities, and infrastructure that maintain it as the financial, retail, transportation, and business hub of the Eastside.

- Add: Increase urban tree canopy and green infrastructure and landscape and building design that reduce heat islands throughout all mix use centers.
- LU-33. Preserve open space and key natural features through a variety of techniques, such as sensitive site planning, conservation easements, existing critical area buffers, green infrastructure practices, transferring density, land use incentives and open space taxation.
- EN-4. Promote and invest in energy efficiency and renewable energy resources as an alternative to non-renewable resources.
 - Add: Work with PSE to improve the safety and reliability of power infrastructure vulnerable to climate change.
 - Add: Support distributed renewable energy generation, and design of buildings for passive survivability. Encourage electric heat pumps and discourage natural gas in new commercial and residential construction.
- EN-5. Protect air, water, land, and energy resources and build climate resilience consistent with Bellevue's role in the regional growth strategy.
- EN-6. Establish an achievable citywide target and take corrective actions to reduce greenhouse gas emissions such as reducing energy consumption and vehicle emissions and enhancing land use patterns to reduce vehicle dependency.
 - Add: Increase tree canopy and green infrastructure to improve resilience to climate change.
- EN-7. Develop and implement climate change adaptation strategies that create a more resilient community by addressing the impacts of climate change to public health and safety, the economy, public and private infrastructure, water resources, and habitat.
 - No change.
- EN-24. Reduce runoff from streets, parking lots and other impervious surfaces and improve surface water quality by utilizing low impact development techniques in new development.
 - Add: Consider modifying stormwater design standards to address extreme precipitation and changes in summer soil moisture including sizing of facilities and types of plantings including those that are native and drought resilient.
- EN-41. Provide information to the public about potential geologic hazards, increased risk from climate change, including site development and building techniques and disaster preparedness.
- EN-45. Implement the citywide use of low impact development techniques and green building practices to protect and improve water and air quality and energy resilience.
- EN-47. Construct and operate new city facilities to exceed required development standards to conserve energy, water, and environmental resources.

- Add: Incentivize new private development for commercial and residential to exceed minimum standards and optimally conserve these resources.
- EN-48. Support the use of emerging best practices in green building and site design including climate resilience measures through the use of pilot programs and model ordinances.
- EN-49. Provide education and incentives to support the implementation of low impact and green development practices (LEED Standards, etc.), integrated site planning, and green building, with a focus on early consideration of these in the site development process.
- EN-62. Preserve and maintain the 100-year floodplain in a natural and undeveloped state, and restore conditions that have become degraded.
 - Add: Update floodplain regulations applicability and standards, consistent with federal and state requirements, to address increasing frequency and extent of flooding and resilience measures in new development.
- EN-86. Facilitate the transfer of development potential away from critical areas ~~and the~~ with ways such as clustering of development on the least sensitive portion of a site.
 - Add: Encourage restoring and maintaining critical areas and open space areas to maximize the climate resilience benefits they provide consistent with best available science.
- NEW: Use a climate vulnerability lens in considering adoption of new policies, zoning, and development standards (e.g. reducing impervious surface, reducing asphalt and other heat absorbing materials, and increasing landscaping and/or tree canopy).

5.1.2 Cultural Resources & Practices, Ecosystems

COMPREHENSIVE PLAN POLICIES AND POTENTIAL MODIFICATIONS

Comprehensive Plan policies are listed below with suggested additions or modifications in ~~strikeout~~ or underline to better address climate change. Suggested additions could be appended to current policies or written as new standalone policies.

- UD-37. Use site design, water efficient landscaping and stormwater management practices to reduce the environmental impact of impervious surfaces.
 - No change.
- UD-84. Designate historic landmark sites and structures and review proposed changes to ensure that these sites and structures will continue to be a part of the community and explore incentives for rehabilitation.
 - Add: Identify and protect historic and cultural sites that may be acutely sensitive to climate hazards such as flooding (e.g. raising, retrofitting, relocating structures).

- PA-8. Develop partnerships with other public agencies and the private sector to provide parks, open space, and cultural and recreation facilities in the city.
 - No change.
- PA-32. Provide environmental stewardship and nature education programs to increase the community's awareness, understanding, and appreciation of Bellevue's natural environment.
 - Add: Create and implement culturally contextualized outreach and education initiatives and materials that will inform the community about near-term and longer-term climate change threats and ways that the community can prepare and build resilience to these changes.
- PA-21. Use parks to celebrate, promote and preserve Bellevue's history, cultural arts and local heritage when consistent with the park's design and programming.
 - No change.
- EN-7. Develop and implement climate change adaptation strategies that create a more resilient community by addressing the impacts of climate change to public health and safety, the economy, public and private infrastructure, water resources, and habitat.
 - No change.
- EN-12. Work toward a citywide tree canopy target of at least 40% canopy coverage that reflects our "City in a Park" character and maintain an action plan for meeting the target across multiple land use types including right-of-way, public lands, and residential and commercial uses.
 - Add: Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.
 - Add: Ensure that tree species selection and planting guidance are updated to be resilient to climate change.
 - Add: Choose native drought- and pest-resistant trees, shrubs, and grasses in restoration efforts to support climate resilience.
- EN-62. Preserve and maintain the 100-year floodplain in a natural and undeveloped state, and restore conditions that have become degraded.
 - Add: Restore floodplains and connectivity to improve the resilience of streams and rivers and reduce flood risk.
 - Add: Protect and restore riparian vegetation to reduce erosion, provide shade, and support other functions that improve the resilience of streams to climate change.
- EN-75. Protect wildlife corridors to minimize habitat fragmentation, especially along existing linkages and in patches of native habitat.
 - Add: Identify opportunities to expand habitat protection and improve habitat quality and connectivity to foster climate resilience using conservation area designations, vegetated buffers, and open space corridors.

- EN-76. Develop programs and regulations acknowledging that designated critical areas such as wetlands, shorelines, riparian corridors, floodplains, and steep slopes provide multiple functions including fish and wildlife habitat.
 - Add: Ensure no net loss of ecosystem composition, structure, and functions, especially in Priority Habitats and Critical Areas, and strive for net ecological gain to enhance climate resilience.

5.1.3 Water Resources, Utilities

COMPREHENSIVE PLAN POLICIES AND POTENTIAL MODIFICATIONS

Comprehensive Plan policies are listed below with suggested additions or modifications in ~~strikeout~~ or underline to better address climate change. Suggested additions could be appended to current policies or written as new standalone policies.

- UT-20. Coordinate emergency preparedness and response with local and regional utility partners.
 - No change.
- UT-34. Provide a storm and surface water system that controls damage from storms, protects surface water quality, provides for the safety and enjoyment of citizens, supports fish and wildlife habitat, and protects the environment.
 - Add: Require the use of green infrastructure and low-impact development where such approaches are feasible, to address increased storm intensities and stormwater runoff.
- UT-38. 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.
 - Add: Develop a fund to build green infrastructure projects that help capture, filter, store, and reuse stormwater runoff.
- UT-39. Provide a reliable, cost-effective supply of safe, secure, high quality drinking water that meets the community's water needs in an environmentally responsible manner.
 - No change.
- UT-41. Provide reliable water service for domestic use, fire flow protection, and emergencies.
 - Add: Construct new water storage systems (e.g. large cisterns, water towers, and reservoirs) to provide back-up water supplies during droughts and emergencies.
- UT-42. Promote conservation and the wise and efficient use of the public water supply and discourage the waste of this valuable resource.
 - Add: Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management.

- SH-48. Work with public health agencies to require repair or replacement of failing onsite septic systems within the shoreline area or require direct connection to the city's sewer system in accordance with the city's wastewater development regulations.
 - No change.
- SH-49. Encourage, natural drainage practices and associated low impact development techniques, where technically feasible, to minimize impervious surfaces, reduce surface water runoff, and prevent water quality degradation.
 - Add: Require the use of green infrastructure and low-impact development to address increased storm intensities and stormwater runoff.

5.1.4 Emergency Management, Human Health

COMPREHENSIVE PLAN POLICIES AND POTENTIAL MODIFICATIONS

Comprehensive Plan policies are listed below with suggested additions or modifications in ~~strikeout~~ or underline to better address climate change. Suggested additions could be appended to current policies or written as new standalone policies.

- N-3. Equip residents, businesses, and community service providers through education and training to be active participants in public safety (including, but not limited to, emergency preparedness, crime prevention, first aid and fire prevention, and climate-related hazards).
 - Add: Connect residents with outreach materials to help them plan and practice actions that make evacuation quicker and safer.
- N-4. Plan and prepare for the response, recovery, and mitigation of potential disasters and hazards.
 - Add: Develop and maintain local government staff members' technical expertise and skills related to climate change, as it relates to emergency management, so as to improve communitywide policy implementation and resilience.
 - Add: Factor climate impacts into the planning of operations and coordination of preparedness, response, and recovery activities among first responders and partners, including public health, law enforcement, fire, school, and emergency medical services (EMS) personnel.
 - Add: Identify needs of at-risk community members and identify strategies that mitigate wildfire smoke, including incentivizing infrastructure updates that protect against wildfire smoke (e.g. HVAC updates and MERV 13 filters for air intake) for facilities that serve high-risk populations.
- HO-41. Collaborate with other jurisdictions and social service organizations to assure availability of emergency shelters and day centers that address homelessness.
 - Add: Collaborate with other jurisdictions and social service organizations to develop resilience hubs — community-serving facilities augmented to support residents and coordinate resource distribution and services before, during, and after a hazard event (Urban Sustainability Directors Network [USDN] 2023).

- EN-51. Work with the private sector to reduce ~~growth in~~ vehicle trips as a key strategy for reducing automobile-related air pollution.
 - Add: Design new development, and work with the private sector to retrofit existing development, to reduce resident exposure to air pollution, to increase access to clean indoor air during smoke events.
 - Add: Consider air quality and environmental health impacts, as well as mitigation strategies, when increasing development capacity for sensitive uses (e.g. day care, elder care) within 500 feet of a freeway where concentrations of air pollutants are already high.
- HS-8. Make Bellevue a welcoming, safe, and just community marked by fairness and equity provided to those disproportionately affected by poverty, discrimination, ~~and~~ victimization, and vulnerable to climate stressors.
- HS-15. Support a network of service points that are easily accessible by Bellevue residents and workers, geographically distributed within the city and proximate to public transit.
 - Add: Develop resilience hubs — community-serving facilities augmented to support residents and coordinate resource distribution and services before, during, and after a hazard event.
- PA-18. Provide a variety of services and programs accessible to all throughout the city with special emphasis on serving those with limited opportunities including low-income households, youth, individuals with disabilities, ~~and~~ older adults, and those vulnerable to climate stressors.

5.1.5 Transportation

COMPREHENSIVE PLAN POLICIES AND POTENTIAL MODIFICATIONS

Comprehensive Plan policies are listed below with suggested additions or modifications in ~~strikeout~~ or underline to better address climate change. Suggested additions could be appended to current policies or written as new standalone policies.

- EN-52. Implement transportation projects that provide significant air quality improvements to areas with existing air quality problems, even where the project does not bring all locations up to adopted standards, provided that the project is the best feasible solution and it significantly improves the air quality at each substandard location.
 - No change.
- TR-2. To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users.
 - Add: Consider system redundancy in planning for a climate-resilient transportation system.
 - Add: Promote government telework options wherever practicable to reduce exposure to extreme events. Transition any staff professional development and training programs to online to reduce need for travel.

- TR-35. Design, maintain, and protect the transportation system—including infrastructure, routes, and travel modes—to be resilient to disaster and climate change impacts.
 - Add: Promote diverse transportation options (e.g. car, bus, bike, sidewalk). Integrate climate change into asset design, maintenance, and management.

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APPENDIX Q

**Bellevue Emergency Housing
Land Capacity Analysis**



memo

to City of Bellevue Staff
from Kate Rogers and Brandon Crawford, MIG
re Bellevue Emergency Housing Land Capacity Analysis
date 1/17/2024

Introduction

The purpose of this memo is to summarize the draft methodology and preliminary results of the City of Bellevue Emergency Housing Land Capacity Analysis (LCA). House Bill 1220¹ (HB 1220, passed 2021) amended the Revised Code of Washington (RCW) 36.70A.070(2) to requires cities in Washington to identify sufficient capacity of land for emergency housing and emergency shelters.² Per the State rules, the City’s Comprehensive Plan Housing Element and implementing regulations must ensure the City has sufficient capacity to meet emergency housing need projections identified for King County jurisdictions. According to King County’s Jurisdictional Housing Needs Allocations, the City needs capacity for **6,688 emergency housing units and/or beds**.³

The City’s Emergency Housing LCA evaluates whether the City’s current capacity for emergency housing meets the identified needs. This analysis is based on the existing land use policies, future land use map and regulations. The results of the LCA may inform updates to the Bellevue Comprehensive Plan Housing Element and the Bellevue Land Use Code.

Methodology and Results

The Washington Department of Commerce (Commerce) provides detailed guidance for updating comprehensive plan housing elements to comply with HB 1220. We followed the recommended steps for conducting an emergency housing LCA, which are outlined in HB 1220 Book 2.⁴ The methodology followed is summarized by step in HB 1220 Book 2 and describes how the guidance was applied to calculate the capacity for Bellevue.

¹ HB 1220, 2021. <https://app.leg.wa.gov/billsummary?Year=2021&BillNumber=1220>

² RCW 36.70A.070 – Comprehensive Plans – Mandatory Elements.
<https://app.leg.wa.gov/rcw/default.aspx?cite=36.70a.070>

³ King County Jurisdictional Housing Needs Allocations
https://tableaupub.kingcounty.gov/t/Public/views/AllocationMethodComparisonsUpdated/AllocationsStory?%3Aembed=y&%3AisGuestRedirectFromVizportal=y&%3Aorigin=card_share_link

⁴ Department of Commerce HB 1220 Book 2: Guidance for Updating your Housing Element.
<https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirlh>

Step 1 – Identify parcels that allow emergency shelters and emergency housing

The City has two use types whose definition includes emergency housing: Homeless Service Uses and Supportive Housing. Table 1 includes the City’s definition for each use type as well as the zones where they are allowed. As explained in Table 1, the City currently regulates Emergency Housing – Non-Transient similar to Supportive Housing, but the City regulates Emergency Housing – Transient as a Homeless Services Use under LUC 20.20.455. The calculations in Table 5 of this memo take a conservative approach with respect to the City’s capacity for Emergency Housing and are based on the City’s unique regulatory scheme, in which Emergency Housing – Transient is treated as a Homeless Service Use.

Table 1. Zones where Homeless Service Uses and Supportive Housing are Allowed.

Use Type	Zones Allowed
<p><u>Homeless Service Uses</u></p> <p>c. Overnight Shelter: Permanent. Any facility that is constructed for the primary purpose of providing shelter for people experiencing homelessness in general or for specific populations of people experiencing homelessness. Supportive services may or may not be provided in addition to the provision of shelter.</p> <p>d. Emergency Housing – Transient. Indoor accommodation for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency Housing – Transient is residential occupancy for a period of less than 30 days.</p>	<p>Allowed as a conditional use:</p> <p>OLB OLB 2 GC NMU CB F1 F2 F3</p>
<p><u>Supportive Housing</u></p> <p>1. Emergency Housing – Nontransient. Indoor accommodation for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency Housing – Nontransient is residential occupancy for a period of 30 days or more.</p> <p>2. Supportive Housing. Residential facilities intended to house individuals and families experiencing homelessness, or at imminent risk of homelessness, and paired with on-site or off-site supportive services designed to maintain long-term or permanent tenancy, or to eventually transition the residents to independent living arrangements. This definition includes Emergency Housing – Nontransient, Permanent Supportive Housing as defined under RCW 36.70A.030, now or as hereafter amended, and Transitional Housing as defined under RCW 84.36.043, now or as hereafter amended.</p>	<p>Allowed as conditional use in PO zone. Allowed outright in all other zones except LI and GC.</p>

Step 2 – Identify Parcels that are Vacant, Hotels/Motels, Underdeveloped, or Declared a Nuisance

Commerce guidance suggests removing any properties that are overly constrained by environmentally critical areas. The data provided by the City included a field for “buildable area” which is the total lot area minus any critical areas. Based on staff input, we narrowed the selection of emergency housing properties to those with at least a quarter acre of buildable area.

Commerce guidance also suggests to “narrow the search to vacant parcels, hotels and motels, significantly under-developed parcels or parcels with no active business licenses, and sites that have been declared a nuisance.” The City provided the data that was used for the most recent land capacity analysis, which we used as the basis for the Emergency Housing LCA assumptions and calculations. The City does not have immediate access to data on nuisance properties or properties without an active business license. Using the data provided, we used the following criteria to identify parcels that are vacant, hotels/motels, or underdeveloped:

- **Vacant.** The data provided included a field for “use description” which included four vacant categories: Commercial, Industrial, Multi-Family, and Single-Family. Any property with one of these vacant categories was selected for emergency housing eligibility.
- **Hotel/Motel.** The same “use description” field that was used to identify vacant parcels has a category for hotels/motels, which was used to identify existing hotels or motels.
- **Significantly Underdeveloped.** The data table provided has criteria for identifying “redevelopable” properties. The City’s previous “redevelopable” calculations identified 22,716 properties that may be redevelopable. “Redevelopable” is a much more inclusive definition than “significantly underdeveloped” and is an unrealistically high number of properties that could feasibly redevelop into emergency housing. Therefore, we made adjustments to identify “significantly underdeveloped” properties that is a better reflection of the guidance in HB 1220 Book 2 and sites that can redevelop into emergency housing (see Table 2). Based on our modifications, we identified 1,108 properties that are significantly underdeveloped.

Table 2. Criteria for Identifying “Significantly Underdeveloped” Properties

	City’s Original Criteria	Changes for “Significantly Underdeveloped”
TRACT	Parcels that include “TRCT”, “HYDR”, “UNKN”, and other parcels with PINS that include letters are non-buildable type parcels. If the parcel number ends in a letter, it is not redevelopable.	No Change.
BUILD	The buildable area is greater than 85% of the minimum lot size.	Changed to twice the size of the min lot area.
PUBOWN	Anything that is publicly owned is considered NOT redevelopable.	Changed to include publicly owned, assuming city-, county-, state-, or utility-owned properties may be developed for emergency housing. Note – parks/open space is filtered out in the “NEVER” category.
NEVER	Certain properties are not considered developable under any scenario (e.g., parks). This indicates if it is on that list.	No Change.
VALUE	If a parcel is R-1 to R-7.5, if the improvement/land value is <1, it is redevelopable. For other zones, if the improvement/sqft is less than the threshold for that zone, is redevelopable.	If the improvement value to land value ratio is less than 0.5, then the parcel is considered significantly underdeveloped, regardless of zone.
UNITS	For parcels in R-1 to R-7.5, if there are more than 1 unit on the parcel already, then it is not redevelopable.	No change.

The analysis in Table 3 and Table 4 includes properties in Residential Land Use Districts where Emergency Housing – Non-transient would be permitted under current development regulations. As shown in Table 3, we estimate that 1,489 parcels have capacity for emergency housing under the criteria outlined above. Most of the capacity comes from vacant lots or significantly underdeveloped lots.

Table 3. Number of Emergency Housing Eligible Lots with at least a quarter acre of developable area

Selection Criteria	Number of Lots
Significantly Underdeveloped	998
Hotel/Motel	30
Vacant	660
Emergency Housing Eligible Lots	1,489*

*The total number of Emergency Housing Eligible Lots is not the sum of significantly underdeveloped, hotel/motel, or vacant lots because there are many lots (~200) that meet the criteria for “vacant” and “significantly underdeveloped.” These parcels were only counted once in the total sum of eligible lots.

Step 3 – Remove Parcels with Pending Development Permits for Land Uses other than Emergency Shelters

Commerce guidance suggests removing any parcels that have pending development permits. GIS data for pending permits was gathered from the City’s Open Data Portal.⁵ This data includes a wide range of permit types. To narrow the search to permits that entail pending development, we selected lots with pending permits for major commercial, medium commercial project, and single-family development. As shown in Table 4, these parameters yield 79 emergency housing eligible lots that have a pending permit. After removing the pending permits, the City has an estimated 1,410 emergency housing eligible lots.

Table 4. Emergency housing eligible lots with pending permits.

Selection Criteria	Number of Lots	Pending Permits	Remaining Eligible Lots
Significantly Underdeveloped	998	47	951
Hotel/Motel	30	1	29
Vacant	660	40	620
<i>Emergency Housing Eligible Lots</i>	<i>1,489</i>	<i>79*</i>	<i>1,410*</i>

**Similar to the number of emergency housing eligible lots, the sum of lots with pending permits under each selection criterion does not equal the total number of pending permits. This is because there are lots with overlapping selection criteria that also have a pending permit.*

Step 4 – Density Assumptions

Commerce guidance suggests applying density assumptions to eligible emergency housing parcels. Commerce guidance provides the following options:

- *Option A (occupancy/intensity method): Using the sites identified in Selection 4, perform a simple site-level analysis of how many emergency shelter beds or emergency housing units could be accommodated based on any adopted occupancy and intensity requirements.*
 - *Identify developable area of the sites. Similar to the LCA for permanent housing, exclude non-buildable areas of the site (critical areas and their buffers, required landscaping and parking areas, setbacks, etc.) from developable area.*
 - *Identify a building envelope based on local regulations that maximizes available building capacity on the site.*
 - *Assume a portion of the envelope would be used for communal support spaces and remove that from the building envelope.*

⁵ City of Bellevue Open Data.
https://data.bellevuewa.gov/datasets/5ad6600946e43f987c57bf1b24f0806_0/explore

- *Assume construction will not exceed local trends in building height or make reasonable assumptions based upon the height limit in the zoning code.*
 - *Use the jurisdictions maximum occupancy rate as allowed by adopted codes to determine the maximum number of emergency beds or units possible in each building envelope.*
- *Option B (assumed density method): Use assumptions about what type of emergency housing and/or emergency shelters are likely to be developed in the jurisdiction and perform a capacity analysis of the sites identified in Selection 4 based on probable development typologies that may be used.*
 - *First, jurisdictions should develop density assumptions (units or beds per acre) that do not exceed adopted occupancy or intensity standards based on:*
 - *Allowed densities for hotels and motels in their local jurisdiction,*
 - *Densities achieved by existing emergency housing or shelters in the local region, and/or*
 - *A density or mix of emergency housing densities based on likely emergency housing or emergency shelter typologies in the jurisdiction, drawn from examples shown in Exhibit 18 or interviews with local developers of emergency housing.*
 - *Based on a combination of emergency housing typologies and densities (see Exhibit 18 for some examples), or a single density assumption of the most likely emergency housing or emergency shelter typology for the community (e.g., converted hotel or motel, congregate shelter, etc.), determine the number of emergency beds or units possible on each site from Selection 4.*

For Homeless Service Uses, we used an assumed density based on the existing Eastside Men’s Shelter. The Eastside Men’s Shelter has 100 beds and is located on a parcel that is 0.74 acres, which equates to about 135 beds/acre. Because this is an existing development, we assume it meets various lot dimension and occupancy standards that would control the allowed density.

Step 5 – Spacing and Intensity and Capacity Calculations

Commerce guidance suggests applying existing spacing and intensity standards to the eligible emergency housing parcels. Homeless service uses are subject to spacing and intensity limitations. LUC 20.20.455 establishes the following limitations for homeless service uses:

20.20.455 Homeless services uses.

[...]

I. Development Standards/Use Requirements.

[...]

3. Occupancy Limits and Size-Related Development Standards.

a. All [homeless services uses](#) shall comply with occupancy limitations contained in applicable [building](#) and fire codes and ordinances adopted by the [City](#).

b. Permanent overnight homeless shelter uses shall not provide sleeping accommodations for more than 100 residents, and shall comply with the following additional requirements:

i. The [City](#) shall impose a condition on any approved permanent overnight homeless shelter use limiting the number of beds to those requested by the applicant.

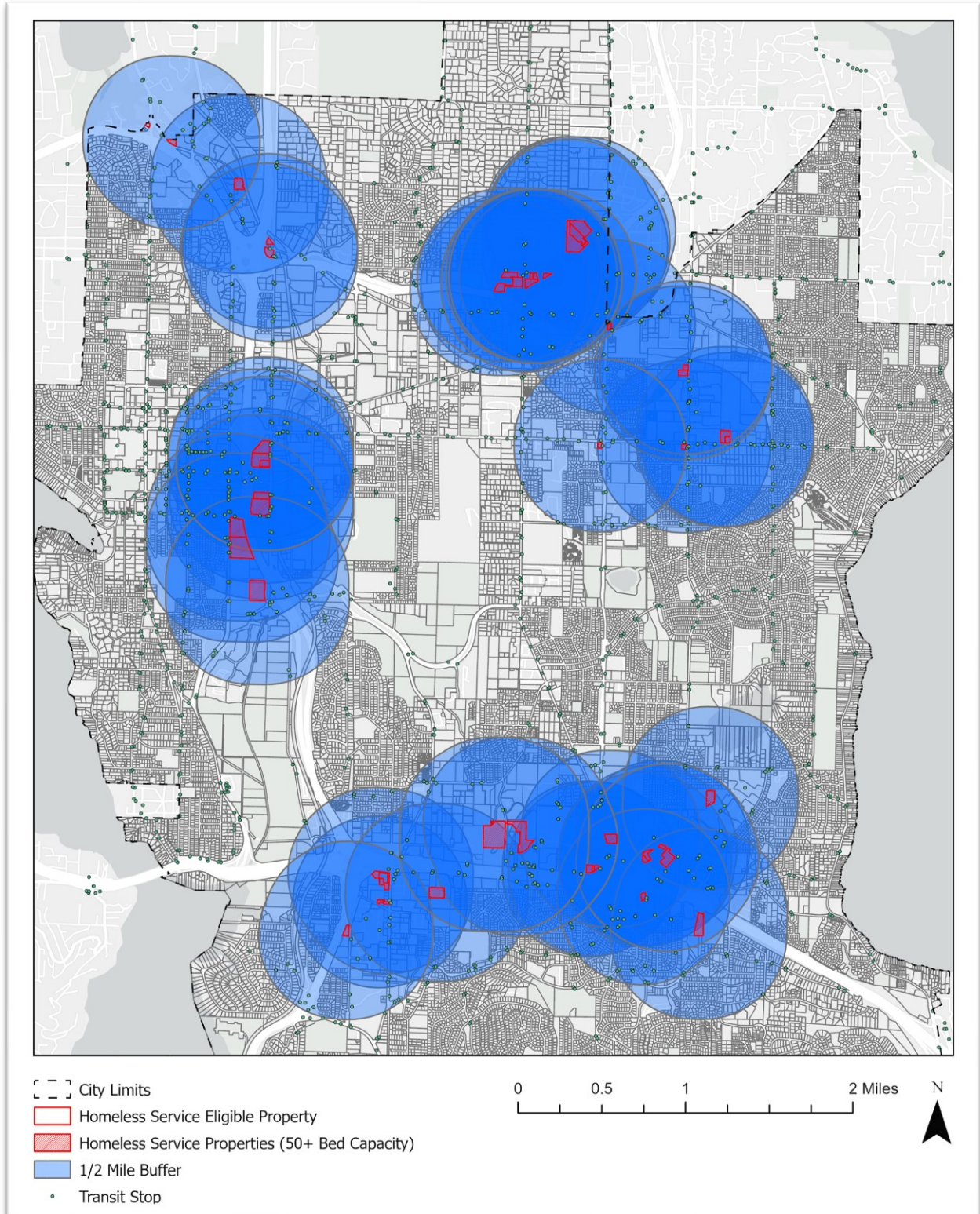
ii. Shelters with more than 50 beds:

(1) Should locate within one mile of a public transit stop; and

(2) Shall locate greater than one-half mile from any other [homeless services use](#) permitted under the terms of this section, unless they are co-located as part of a single [development](#).

As shown in Figure 1, all homeless service eligible parcels are located within one mile of a transit stop and they are all within one-half mile of at least one other parcel that has homeless service capacity. Therefore, we rounded every parcel that has capacity for over 50 beds (based on previous criteria) down to 50 beds.

Figure 1. Location of Homeless Service Eligible Properties Relative to One Another



Step 6 – Add Capacity from all Available Sites

Table 5 compares Homeless Service capacity under current regulations with scenarios of capacity under relaxed regulations. Specifically, the relaxed regulation scenarios show how much additional capacity is available if:

- Spacing requirements are removed – i.e., remove one-half mile spacing requirements for facilities with 50 or more residents; or
- Spacing and intensity requirements are removed – i.e., remove the max capacity of 100 residents.

Table 5. Homeless Service Capacity Under Current Regulations Compared to Relaxed Regulations

Zone	Homeless Service Capacity: Current Regulations	Homeless Service Capacity: No Spacing Requirements	Homeless Service Capacity: No Spacing or Intensity Requirements
CB	892	1,432	2,022
F-1	0	0	0
F-2	50	100	388
F-3	0	0	0
GC	492	827	1,550
NMU	50	95	95
OLB	724	1,424	9,694
OLB2	150	300	1,434
Total	2,358	4,178	15,183

Step 7 – Compare Emergency Housing Need to Emergency Housing Demand

According to King County’s Jurisdictional Housing Needs Allocations, the City needs capacity for **6,688 emergency housing units and/or beds**.⁶ The City’s combined capacity for Emergency Housing – Transient, which is regulated as a Homeless Services Use, is less than the King County identified need for this type of housing based on current regulations. If spacing and density limits are removed, the city would have capacity to meet the need for transient Emergency Housing. On the other hand, the City has capacity for Emergency Housing – Non-transient, which is regulated as Supportive Housing, without any changes to current regulations.

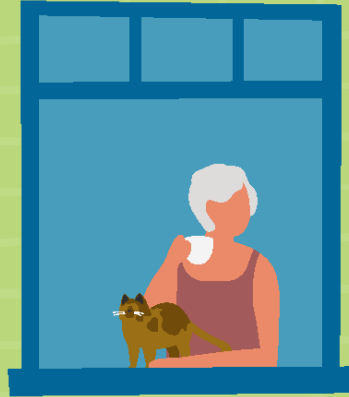
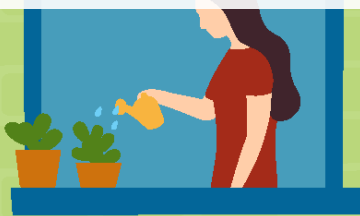
⁶ King County Jurisdictional Housing Needs Allocations
https://tableaupub.kingcounty.gov/t/Public/views/AllocationMethodComparisonsUpdated/AllocationsStory?%3Aembed=y&%3AisGuestRedirectFromVizportal=y&%3Aorigin=card_share_link



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APPENDIX R

**Bellevue Affordable Housing
Capacity Analysis, Technical Report**



DATE: November 13, 2023

FROM: Gwen Rousseau, AICP, Senior Planner
Kate Nesse, PhD, Senior Planner
Community Development Department

SUBJECT: Affordable Housing Capacity, Technical Report

Background

The Growth Management Act (GMA) requires comprehensive plans to include a housing element that identifies “sufficient capacity of land” to accommodate all projected housing needs during the horizon period of the plan (RCW 36.70A.070(2)(c)). HB 1220 amended this section of the Act to require the housing element to include explicit consideration of capacity for the following household needs and building types:

- Moderate, low, very low, and extremely low-income households;
- Permanent supportive housing;
- Emergency housing and emergency shelters; and
- Duplexes, triplexes and townhomes (within an urban growth area boundary).

In July 2023, the Washington State Commerce Department issued guidance on calculating these in [“Guidance for Updating Your Housing Element \(Book 2\)”](#). This summary documents the process and results of the calculations done under this guidance.

The Process

Commerce recommends that counties and cities complete the five steps to analyze and assess their capacity by income level. The goal of this process is to show quantitatively whether the jurisdiction has enough capacity to meet its allocated housing needs at each income level. The outcome is a table showing the different income categories relative to the Area Median Income (AMI), the different land use categories where households in those income categories might be served, the capacity for units in those land use categories and the need for housing in Bellevue (as calculated by King County) at the various income levels. The steps to achieve this table are:

1. Summarize land capacity by zone
2. Categorize zones by allowed housing types and density levels
3. Relate zone categories to potential income levels and housing types served
4. Summarize capacity by zone category
5. Compare projected housing needs to zone capacity
6. (If deficit is found) Implement actions to increase capacity for one or more housing needs. Then re-assess capacity (Step 1) based on actions.

Step 1. Summarize Land Capacity by Zone

Residential land capacity is a combination of the amount of land available for development, the housing types and densities allowed under applicable development regulations, and any encumbrances on the land that limit the ability to develop, such as environmental constraints, infrastructure requirements or local market forces. The Commerce Guidance recommends the following steps to summarize the land capacity by zone:

1. Identify residential land supply and assign development status
2. Exclude lands unlikely to develop
3. Identify gaps in utility infrastructure and services
4. Calculate gross residential capacity by zone
5. Calculate net residential capacity by zone
6. Calculate additional capacity for ADUs on developed lots (Optional)
7. Summarize total residential capacity

The City of Bellevue estimated residential land capacity in the development of a Preferred Alternative to be studied in the Environmental Impact Statement for the Comprehensive Plan Periodic Update. That estimate covers steps 1 through 5, however, it does not account for any “local market forces”. To account for that, we applied a market factor of 25 percent to most zoning categories as recommended by the Commerce Guidance. However, for moderate density capacity resulting from HB 1110 and lowrise capacity resulting from density bonuses allowed on single family properties owned by religious organizations, we applied market factors of 50 percent. For new zones, we used a similar existing zone. The capacity includes capacity for ADUs so ADUs are not broken out separately (as in step 6).

Step 2. Categorize zones by allowed housing types and density levels

Housing costs and affordability can vary significantly by housing type, and housing types and densities are determined in part by zoning and other local development regulations. The Commerce Guidance is to classify zones into the following five categories:

- **Low Density:** Detached single-family homes
- **Moderate Density:** Townhomes, duplex, triplex, quadplex
- **Low-Rise Multifamily:** Walk-up apartments or condominiums (up to 3 floors)
- **Mid-Rise Multifamily:** Apartments or condominiums in buildings with ~4-8 floors (~40-85 feet in height)
- **High-Rise/Tower:** Apartments or condominiums in buildings with ~9 or more floors (>85 feet in height) and requiring steel frame construction

Table 1. Zones by Category, summarizes which Bellevue zones fall into the above categories. Zones R-2.5 to R-5 are considered Low Density in the No Action Scenario. However, they are in the Moderate Density category in the Preferred Alternative because HB 1110 and HB 1337 changed the allowable density in these areas. R-2.5 is 2 to 3 lots on an acre. With 4 units per lot (as is allowed under HB 1110), that works out to between 13 and 24 units per acre at the maximum.

Table 1. Zones by Category

Low Density	Moderate Density	Lowrise	Midrise	Highrise/ Tower
EH-D	BR-ORT	C-1 Eligible	BR-CR	BR-RC-H-2
R-1	BR-R	MU-L	BR-OR-2	DT-MU
R-1.8	R-7.5	NB	BR-RC-2	DT-MU-CC
R-2.5*	R-10	OLB	BR-RC-3	DT-MU-PO-B2/3
R-3.5*	R-15	R-30	CB	DT-O-1
R-4*	R-20	R-40	DT-OLB-N	DT-O-2-E/N/S
R-5*		R-60	EG-TOD	DT-OLB-C/S
			EM-TOD-L	DT-R
			F-1	EM-TOD-H
			F-2	MU-H-2
			F-3	MU-H-3
			NMU	OR-H-2
			OLB2	OR-H-3
			OR-M	
			RC-M	
			BR-OR-1	
			BR-OR-H-1	
			BR-RC-1	
			MU-H-1	
			OR-H-1	
			RC-H-1	

80% of capacity in this zone

* Considered moderate density in the Preferred Alternative due to HB 1110 allowances.

Bellevue decided to include zones ending in H-1, which indicates a lower end of “highrise”, in the Midrise category based on the following reasons:

1. In the past 20 years, zones that are like the H-1 zones have produced housing in buildings ranging from 6 to 9 stories, a scale likely to be seen in a midrise district.
2. In the calculations for the Urban Growth Capacity Report and in the calculations for the Preferred Alternative capacity, a similar assumed density to other midrise zones (a floor area ratio between 3 and 4) was used for H-1 zones.
3. While in the past 20 years, all housing in the zones like H-1 has been of a midrise character and this may continue to be the case going forward, the City chose to be more conservative and estimate that only 80 percent of the housing capacity in H-1 zones will be of a midrise character.

Step 3. Relate zone categories to potential income levels and housing types served

To ensure land capacity for all income segments, Commerce Guidance instructs cities make assumptions about the types of housing each household is likely to occupy. The Commerce Department Guidance suggests the following income levels associated with each category:

- **Low Density:** Higher income (>120% AMI)
- **Moderate Density:** Higher income (>120% AMI)
- **Low-Rise Multifamily:** Low income (0-80% AMI) and PSH
- **Mid-Rise Multifamily:** Low income (0-80% AMI) and PSH
- **High-Rise/Tower:** Moderate income (>80-120% AMI)
- **ADUs:** Moderate income (>80-120% AMI)

Bellevue adopted this guidance for the analysis with the exception of ADUs, which are grouped in the Moderate Density category.

The Guidance notes that if the jurisdiction has a mandatory Inclusionary Zoning program, then the jurisdiction can include the proportion required under the program for the affordability levels addressed. If the jurisdiction has a voluntary Inclusionary Zoning program, the jurisdiction can include the proportion that has been produced in the past under that program. Bellevue does not currently have a mandatory program. Bellevue does have a voluntary inclusionary program, but the program primarily applies in Midrise zones, which are already assumed to have the capacity for Low Income and PSH housing.

Step 4. Summarize Capacity by Zone Category

The next step is to summarize land capacity for housing unit production by zone category. Table 2. Growth Capacity by Category shows the capacity (from Table 1) grouped into the Zone Categories. ADUs are not separated out from the zones in which they could occur but are counted as part of the overall capacity. In addition, only zones falling into the Zone categories are included. There is some existing

Table 2. Growth Capacity by Zone Category

Zone Category	Growth Capacity				
	Alt 0	Alt 1	Alt 2	Alt 3	Preferred Alt
Low Density	7,409	6,148	766	(6,924)	(17,730)
Moderate Density	3,758	2,439	437	13,440	49,769
Low-Rise*	1,862	911	15,908	15,994	6,401
Mid-Rise**	12,834	18,450	21,916	16,844	33,605
High-Rise	16,266	20,481	22,304	35,311	21,660
Total Housing	42,128	48,428	61,330	74,665	93,705
Affordable Housing Capacity (low + mid-rise)	14,696	19,361	37,824	32,837	40,007

*Includes C-1 properties.
 **Includes 80% of Highrise-1 capacity

development and capacity in zones that are primarily commercial but those are not included in this analysis.

Commerce Guidance instructs cities to consider all of the capacity in a category flagged as feasible for Low Income housing or PSH housing as capacity for that style of housing. Bellevue recognizes that it is not realistic to expect that all of it would develop as housing serving the lowest income households. There are many other factors that influence whether affordable housing is built, including available funding, organizational capacity, material and construction capacity, among other factors.

Step 5. Compare projected housing needs to zone capacity

To determine whether Bellevue has capacity for affordable housing, Commerce Guidance instructs cities to compare the jurisdiction’s projected housing needs by income level to capacity to determine if there is sufficient capacity to accommodate needs at all income levels. Bellevue has calculated housing needs in the City, however, King County has also calculated housing needs for Bellevue and has adopted it as part of the Countywide Planning Policies. The Commerce Guidance document does not indicate which set of numbers cities should compare their capacity to. Bellevue has chosen to compare the capacity to the need levels adopted by King County in the Countywide Planning Policies.

Table 3. Need and Capacity Comparison, shows the level of need for each income group and the capacity in Bellevue for housing serving that income group for both the No Action and the Preferred alternatives. The table shows that there is capacity under the Preferred Alternative for affordable housing in all income groups. Capacity totals from Table 2 can be compared to the Aggregate Housing Needs column in Table 3 to compare capacity under other alternatives. The No Action Alternative would have a deficit of capacity for income categories under 80% AMI. Since a deficit was not found under the Preferred Alternative, the City did not complete Step 6.

Income Level (%AMI) and Special Housing Needs	Projected Housing Need	Zone Categories Serving These Needs	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0 to ≤30% PSH	6,270	Low-rise and Mid-rise	29,646	40,007	10,361
0 to ≤30% non-PSH	11,925				
>30 to ≤50%	8,780				
>50 to ≤80%	2,671				
>80 to ≤100%	703	Moderate density	1,501	49,769	48,268
>100 to ≤120%	798				
>120%	3,853	Low density and High-rise density	3,853	3,930	77
Total	35,000		35,000	93,705	58,705

The Commerce Guidance suggests that cities document their progress since 2020 toward meeting the need for affordable housing by listing all projects that have been developed or are in the development pipeline with the number of affordable units created and the income levels those units are reserved for. That list is included below.

Complete:

- 888 Bellevue, 888 108th Ave NE (32 units, 51-80% AMI)
- Aventine, 211 112th Ave NE (35 units, 51-80% AMI)
- Bellevue 10, 10050 NE 10th St (21 units, 51-80% AMI)
- Borgata, 37 103rd Ave NE (17 units, 51-80% AMI)
- Carrington, 2501 148th Ave SE (108 units, 51-80% AMI)
- Eastgate Men's Shelter, 14350 SE Eastgate Way (100 units, emergency housing)
- Illahee Apartments, 14049 Bel-Red Rd (36 units, Section 8)
- Mary's Place Temporary Shelter, 10621 NE 12th St, (90 units, emergency housing)
- Pinewood Village, 14911 NE 1st Pl (108 units, 51-80% AMI)
- Plymouth Crossing Permanent Supportive Housing, 14350 SE Eastgate Way (92 units, 0-30% AMI)
- Sandpiper East, 1312 139th Ave NE (224 units, 51-80% AMI)
- Surrey Downs, 13035 SE 26th St (122 units, 51-80% AMI)

Pipeline:

- Bellevue Station, 1525 132nd Ave NE (58 units, 51-80% AMI)
- Big 1 Residential, 13000 NE Bel-Red Rd (11 units, 51-80% AMI)
- Inland Polaris at Eastgate, 14350 SE Eastgate Way (360 units, affordability level not defined/unknown)
- Northup Way Mixed Use, 12863 Northup Way (81 units, 51-80% AMI)
- SummerHill Highland Park, 14125 NE 20th St (81 units, 51-80% AMI)