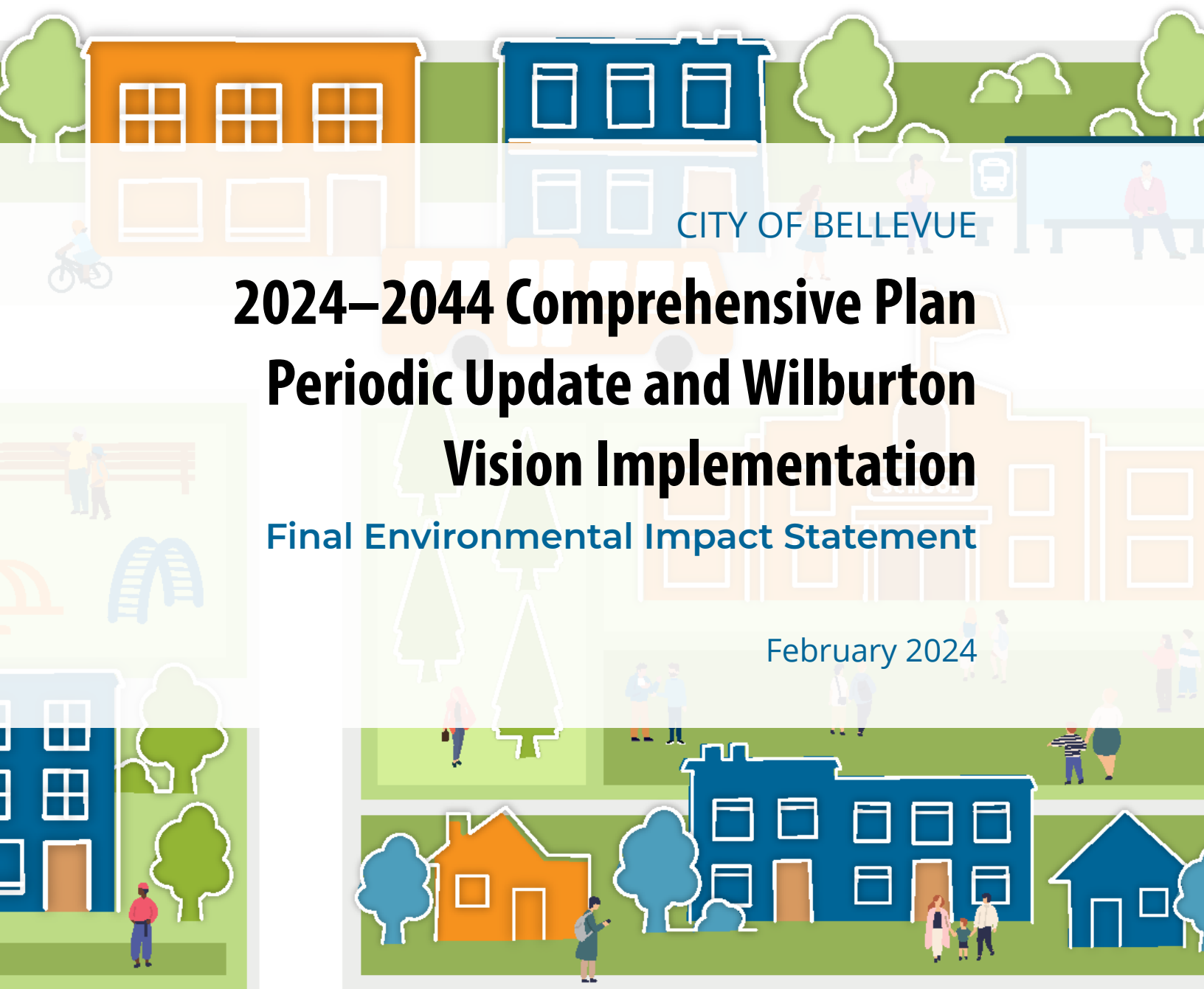




CITY OF BELLEVUE

2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Final Environmental Impact Statement

February 2024





Americans with Disabilities Act (ADA) Language and Title VI Language

ENGLISH

ADA Language



For alternate formats, interpreters, or reasonable accommodation requests please phone at least 48 hours in advance 425.452.6930 (voice) or email bbrod@bellevuewa.gov. For complaints regarding accommodations, contact City of Bellevue ADA/Title VI Administrator at 425.452.6168 (voice). If you are deaf or hard of hearing dial 711. All meetings are wheelchair accessible.

If you have any questions regarding the ADA statement above or need help, please reach out to ADA Coordinator Blayne Amson, bamson@bellevuewa.gov or 425.452.6168.

Title VI Language

The City of Bellevue assures that no person shall on the grounds of race, color, national origin, or sex as provided by Title VI of the Civil Rights Act of 1964, and related statutes, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any City of Bellevue program or activity. Any person who believes his/her Title VI protection has been violated may file a complaint with the ADA/Title VI Administrator. For Title VI complaint forms and advice, please contact the ADA/Title VI Administrator at 425.452.6168.

SPANISH

ADA Language

Para obtener formatos alternativos, intérpretes o solicitudes de acomodación razonable, por favor llame por lo menos 48 horas antes al 425.452.2064 (voz) o envíe un correo electrónico a bbrod@bellevuewa.gov Para quejas relacionadas con las acomodaciones, comuníquese con el administrador de la ADA/ Título VI de la ciudad de Bellevue al 425.452.6168 (voz) o envíe un correo electrónico a ADATitleVI@bellevuewa.gov. Si usted es una persona sorda o tiene problemas de audición marque al 711.

Title VI Language

La Ciudad de Bellevue garantiza que ninguna persona será excluida de participar, no se le denegarán beneficios, ni estará de otra manera sujeta a discriminación en cualquier programa o actividad de la Ciudad de Bellevue, por motivos de raza, color, origen nacional o sexo, según lo previsto en el Artículo VI de la Ley de Derechos Civiles de 1964 y los estatutos relacionados. Para más información, por favor comuníquese con Service First llamando al 425.452.6800.

VIETNAMESE

ADA Language

Để yêu cầu định dạng thay thế, thông dịch viên, hoặc hỗ trợ hợp lý cho người có nhu cầu đặc biệt, vui lòng gọi trước ít nhất 48 giờ theo số 425.452.2064 (cuộc gọi thoại) hoặc gửi email về bbrod@bellevuewa.gov. Để khiếu nại về hình thức hỗ trợ cho người có nhu cầu đặc biệt, xin liên hệ với City of Bellevue ADA/Title VI Administrator theo số 425.452.6168 (cuộc gọi thoại) hoặc gửi email về ADATitleVI@bellevuewa.gov. Nếu quý vị bị điếc hoặc khó nghe, xin bấm số 711. Có thể sử dụng xe lăn trong tất cả các cuộc họp.

Title VI Language

Thành Phố Bellevue cam đoan không một người nào bị loại không được tham gia, bị từ chối các phúc lợi, hay nói cách khác là bị kỳ thị trong bất cứ chương trình hoặc hoạt động nào của Thành Phố Bellevue vì lý do chủng tộc, màu da, nguồn gốc quốc gia hoặc giới tính như đã quy định trong Tiêu Đề VI Đạo Luật Dân Quyền năm 1964 và các luật lệ liên quan.

Để biết thêm tin tức, xin liên lạc Service First ở số 425.452.6800.

RUSSIAN

ADA Language

Чтобы подать запрос на изменение формата, предоставление переводчика или разумное приспособление, не менее чем за 48 часов позвоните по телефону 425.452.2064 либо напишите по адресу электронной почты bbrod@bellevuewa.gov. С жалобами по поводу приспособлений обратитесь к администратору города Bellevue по вопросам статьи VI и правам граждан с ограниченными возможностями по телефону 425.452.6168 или адресу электронной почты ADATitleVI@bellevuewa.gov. Если вы страдаете от глухоты или испытываете трудности, связанные со слухом, позвоните по телефону 711.

Title VI Language

Администрация города Беллевью гарантирует, что в рамках ее любой программы или деятельности никому не будет отказано в участии, никто не будет лишен доступа ко льготам или подвергнут какой-либо дискриминации по признаку расы, цвета кожи, страны происхождения или пола, как предусмотрено в разделе VI Закона о гражданских правах 1964 года и сопутствующих законодательных актах. Для получения дополнительной информации обращайтесь в Service First по телефону 425.452.6800.

KOREAN

ADA Language

기타 양식, 통역 또는 편의 제공 요청이 있으면 최소 48시간 전에 425.452.2064 번으로 전화(음성)하거나 bbrod@bellevuewa.gov 로 이메일을 보내주세요. 편의 관련 불만 사항의 경우, Bellevue 시 미국 장애인법(Americans with Disabilities Act, ADA)/Title VI 관리자에게 425.452.6168번으로 전화(음성)하시기 바랍니다. 청각 장애가 있는 분은 711번으로 연락해 주시기 바랍니다. 모든 방문 시 휠체어 이용이 가능합니다.

Title VI Language

벨뷰 시는 1964년 시민권법 타이틀 VI 또는 관련 법규에서 정하는 바와 같이 어떠한 사람도 인종, 피부색, 출신국 또는 성별을 근거로 벨뷰 시의 프로그램이나 활동에서 참여할 수 없도록 제외되거나, 관련 혜택을 받지 못하거나 차별받는 일이 없도록 하고 있습니다. 보다 자세한 정보는 Service First에 425.452.6800번으로 문의해 주십시오.

JAPANESE

ADA Language

代替形式、通訳者、または合理的な宿泊施設のリクエストについては、425.452.2064 (音声)または電子メール bbrod@bellevuewa.gov 48時間前までに電話してください。宿泊施設に関する苦情については、425.452.6168(音声)または電子メール ADATitleVI@bellevuewa.gov のベルビューADA/タイトルVI管理者にお問い合わせください。あなたが聴覚障害や難聴ダイヤル711の場合。すべての会議は車椅子でアクセス可能です。

Title VI Language

ベルビュー市は、1964年の公民権法第VI編、ならびにこれに関連する法律規則に定める通り、何人に対しても人種、皮膚の色、出身国、または性別を理由にベルビュー市の施策または活動への参加を排斥したり、それによりもたらされる恩恵を否定したり、あるいは他の差別行為を行うことを禁じています。

詳細については、サービス・ファースト部門に電話 (425.452.6800)にてお問い合わせください。

CHINESE – SIMPLIFIED

ADA Language

如需要其他形式、口译人员或合理的住宿环境，请至少提前 48 小时致电 425.452.2064（语音）或发送电子邮件至 bbrod@bellevuewa.gov。关于住宿方面的投诉，请联系 Bellevue 市的 ADA/第六章管理员，电话：425.452.6168（语音）或发送电子邮件至 ADATitleVI@bellevuewa.gov。如果您为失聪或听力障碍人士，请拨打 711。

Title VI Language

Bellevue 市政府根据《1964 年民权法案》第六章及相关法令的规定，确保任何人不会因为种族、肤色、国籍或性别而被排除参加或被拒绝享受 Bellevue 市政府任何计划或活动中的各种福利，或因其他原因而在这些计划或活动中受到歧视。欲了解更多信息，请联系 Service First 部门，电话 425.452.6800。

CHINESE – TRADITIONAL

ADA Language

如需其他格式表單、口譯員或合理便利措施，請至少提前 48 小時致電 425.452.2064（語音）或發送電郵至 bbrod@bellevuewa.gov 便利措施相關投訴，請致電 425.452.6168（語音）或發送電郵至 ADATitleVI@bellevuewa.gov，聯絡 Bellevue 市 ADA/第六章管理員。如果您是聽障人士，請撥打 711。

Title VI Language

Bellevue 市政府根據《1964 年民權法案》第六章及相關法令的規定，確保任何人不會因為種族、膚色、國籍或性別而被排除參加或被拒絕享受 Bellevue 市政府任何計劃或活動中的各種福利，或因其他原因而在這些計劃或活動中受到歧視。

欲瞭解更多資訊，請聯繫 Service First 部門，電話 425.452.6800。

INTENTIONALLY BLANK



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

February 2024

Subject: City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

Dear Community Members:

The City of Bellevue is updating its Comprehensive Plan and planning for growth to the year 2044.

The Comprehensive Plan captures the city's vision for the future of Bellevue, sets policy that directs city actions and decisions, and guides capital investments. The objective of the update to this plan is to continue Bellevue's legacy of well-managed growth that prioritizes a high quality of life and community building. The update will integrate state, regional, and county requirements with the City Council's updated vision for the city, community feedback, and guidance from city studies and plans.

The update plans for growth of at least an additional 35,000 housing units and 70,000 jobs by the year 2044. The update includes an Environmental Impact Statement (EIS) consistent with the requirements of the State Environmental Policy Act (SEPA) in Washington State.

The Final EIS (FEIS) considers a Preferred Alternative to distribute growth that aligns with regional requirements for equity, climate change, and housing, as well as recently adopted vision and priorities by the City Council. The EIS also includes a subarea-specific analysis for future land use and associated environmental impacts for the Wilburton study area (which consists of portions of the Wilburton/NE 8th Street and BelRed Subareas).

The SEPA process identifies and analyzes environmental impacts to help agency decision-makers, applicants, and the public understand how the proposal will affect the environment. The EIS process is a tool for identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and potential mitigation. An EIS must inform decision-makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

The Preferred Alternative is provided to show the decision the City has recommended for capacities to accommodate housing and job growth, housing types, and investments in infrastructure citywide and in the Wilburton study area. The following Preferred Alternative is analyzed in the FEIS as well as a No Action Alternative:

Preferred Alternative for City as a Whole: The Preferred Alternative for the city as a whole is a hybrid of all of the three Action Alternatives with additional changes to incorporate capacity mandated under HB 1110 and HB 1337. The Preferred Alternative has capacity for 323,000 jobs, about 185,000 additional capacity for jobs over 2019 jobs and about 60,000 over the capacity in the No Action Alternative. The Wilburton study area accounts for about 20 percent of the additional capacity and about 53 percent of the capacity over the No Action Alternative. The Preferred Alternative has capacity for about 216,000 housing units, about 152,000 additional capacity for housing units over 2019 housing units and about 111,000 over



the capacity under the No Action Alternative. About 47 percent of the additional capacity (and about 61 percent of the capacity over the No Action Alternative) is in low density residential areas, primarily due to the additional capacity created under HB 1110 and HB 1337.

The Preferred Alternative includes additional capacity in Mixed Use Centers that is similar to a mix of Action Alternatives 2 and 3. It would allow for development at heights similar to Action Alternative 3 in the middles of the Mixed Use Centers with mid-rise and low-rise development at the edges to transition to the heights of adjacent areas. See the paragraph on the Wilburton study area for details on the Preferred Alternative studied. In BelRed, the future land use is closest to Alternative 3 but the with a more gradual stepping down of heights around the 130th station area, similar to Alternative 1, and a greater intensity of office use around the 120th/Spring District station area than was studied in the Action Alternatives.

The Preferred Alternative includes capacity in Neighborhood Centers, similar to Action Alternatives 2 and 3 with some retail-focused Neighborhood Centers accommodating more capacity in the middle of the Centers. Most Neighborhood Centers are analyzed with a mix of residential and commercial uses and low-rise buildings. However, three of the centers—Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village—are being analyzed with greater density, as Council provided feedback during discussion of the Preferred Alternative that these centers should be studied with allowances for greater residential density that is allowed in low to mid-rise buildings, in order to provide an opportunity for future redevelopment.

Outside of Mixed Use Centers and Neighborhood Centers, the future land use remains largely the same, similar to Action Alternative 1. However, the specific criteria for increased housing density as outlined in HB 1110 and HB 1337 have been incorporated into the Preferred Alternative, creating far more capacity for housing across the city than was analyzed in Alternative 1.

Preferred Alternative for Wilburton: The Preferred Alternative for the **Wilburton study area** is a hybrid of Wilburton study area Action Alternatives 2 and 3. It allows for greater housing capacity than Action Alternative 3, while focusing most of this additional housing proximate to Eastrail, nearby parks and open spaces, and lower-density residential areas. The highest intensity development potential would be allowed adjacent to Interstate 405 as well as along the Grand Connection between Interstate-405 and Eastrail. Development would transition down in height to lower high-rise and mid-rise scale uses toward the east and southeast study area edges.

The Preferred Alternative would allow for primarily high-rise office uses along the west side of 116th Avenue NE; a mix of high-rise residential, office, and other commercial uses along the east side of 116th Avenue NE and along NE 8th Street; high-rise and mid-rise residential development along 120th Avenue NE; and primarily mid-rise residential development toward the east and southeast edges of the Wilburton study area and around Lake Bellevue. A small area for primarily medical office is located at the corner of 116th Avenue NE and NE 12th Street.

The Preferred Alternative would have capacity for an additional 12.0 million square feet of commercial development in the Wilburton study area and would include an additional 14,800 housing units and space for an additional 35,500 jobs.

The FEIS analyzes the impacts of the alternatives on elements of the environment such as Land Use and Urban Form, Aesthetics, Air Quality and Greenhouse Gas Emissions, Noise, and Transportation. The



February 2024

City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision
Implementation Environmental Impact Statement

3

purpose of the analysis is to estimate the nature, severity, and duration of impacts that might occur and to compare the impacts of the Preferred Alternative and the No Action Alternative.

If you have questions, please contact:

- Reilly Pittman, Environmental Planning Manager, 425.452.4350 or rpittman@bellevuewa.gov

For more information, please see the project website:

- <https://bellevuewa.gov/2044-environmental-review>

Thank you for your interest in the future of Bellevue.

Sincerely,

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



February 2024

City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision
Implementation Environmental Impact Statement

INTENTIONALLY BLANK



FACT SHEET

Final Environmental Impact Statement

PROJECT NAME

City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement (EIS)
– File Number: 22-116423 LE

DATE OF ISSUE OF FINAL EIS

February 1, 2024

PROPOSED ACTION

The City of Bellevue is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA).

PERMITS, LICENSES, AND APPROVALS LIKELY REQUIRED FOR PROPOSAL

Comprehensive Plans must be considered and approved by the City Council after Planning Commission recommendations are made. The Washington Department of Commerce coordinates state agency review during a required 60-day review period. The Puget Sound Regional Council certifies Transportation Elements of Comprehensive Plans.

DOCUMENT AVAILABILITY AND COST TO THE PUBLIC

Project-related information can be reviewed for free on the project website at <https://bellevuewa.gov/2044-environmental-review>.

Project Proponent and State Environmental Policy Act (SEPA) Lead Agency

City of Bellevue Community Development Department

SEPA Responsible Official

Elizabeth Stead, Land Use Director

Authors and Contributors

A list of authors and contributors is provided on page FS-2.

Location of Background Materials

Background materials used in the preparation of this Final EIS are listed in Chapter 14, *References*.

LIST OF PREPARERS

Environmental Science Associates

2801 Alaskan Way, Suite 200, Seattle, WA 98121

Telephone: 206.789.9658

(Prime Consultant, Air Quality and GHG, Noise, Plants and Animals, Water, Public Services and Utilities, Historic Resources, Climate Vulnerability Assessment, Economic Analysis, Public Outreach)

BERK Consulting

2200 6th Avenue, Suite 1000, Seattle, WA 98121

Telephone: 206.324.8760

(Land Use and Urban Form, Plans and Policies, Population and Employment, Aesthetics, Housing, Climate Vulnerability Assessment, Economic Analysis)

Fehr & Peers

601 Union Street, Suite 3525, Seattle, WA 98101

Telephone: 206.576.4220

(Transportation)

Stepherson & Associates

2815 2nd Avenue, Suite 555, Seattle, WA 98121

Telephone: 206.508.1461

(Public Outreach)

The Vida Agency

1411 3rd Avenue N, Suite 101, Edmonds, WA 98020

(Equity, Translation)

Seva Workshop

3204 NE 86th Street, Seattle, WA 98115

(Housing, Equity, Displacement)

Leland Consulting Group

610 SW Alder Street, Suite 1200 Portland, OR 97205

(Economic Report)

DRAFT EIS DATE OF ISSUANCE

April 27, 2023

DRAFT EIS COMMENT PERIOD

The City of Bellevue requested comments from citizens, agencies, tribes, and all interested parties on the Draft EIS during a 45-day period from April 27 to June 12, 2023. All written comments were directed to:

<https://comment-tracker.esassoc.com/bellevue/index.html> or via email to CompPlan2044EIS@bellevuewa.gov.

Mailed comments were sent to:

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

Three public meetings were held, including one virtual meeting and two in-person meetings. Comment opportunities were offered at one virtual public meeting:

- May 18, 2023

Comment opportunities were offered at two in-person meetings:

- May 23, 2023, at the Crossroads Community Center 16000 NE 10th Street, Bellevue, WA
- Thursday June 1, 2023, at Bellevue City Hall at 450 110th Avenue NE, Bellevue, WA

There was an opportunity to provide public comment and a court reporter was in attendance to transcribe comments.

DATE OF FINAL ACTION

Anticipated fall/winter 2024

PRIOR ENVIRONMENTAL REVIEW

Prior State Environmental Policy Act (SEPA) documents considered in this EIS and incorporated by reference are listed below:

- Wilburton Commercial Area Land Use and Transportation Project Draft EIS (February 2018), incorporated for background information and data.
 - VISION 2050 Draft and Final Supplemental EIS (February 2019 and March 2020).
 - Draft Environmental Impact Statement (April 2023).
-

TIMING OF FUTURE ENVIRONMENTAL REVIEW

This EIS is in accordance with Washington Administrative Code (WAC)-197-11-560. This document focuses on the impacts resulting from the adoption of the Preferred Alternative including the following:

- Broad policy implications of adoption of the Preferred Alternative.
- General analysis of impacts on natural and human environments.

Specific projects will undergo separate project-level SEPA review as they are funded for design and/or implementation. Project-level review may result in different procedural compliance for individual projects.

INTENTIONALLY BLANK



CITY OF BELLEVUE

2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Final Environmental Impact Statement



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

February 2024



Contents

	PAGE
FINAL ENVIRONMENTAL IMPACT STATEMENT	
Abbreviations and Acronyms	xv
CHAPTER 1 Introduction and Summary	1-1
1.1 Introduction	1-1
1.2 Organization of the FEIS	1-1
1.3 Project Purpose, Desired Outcomes, and Exclusions	1-2
1.4 Study Area	1-3
1.5 SEPA Process and Public Involvement	1-6
1.5.1 Environmental Review Process	1-6
1.5.2 Scoping	1-8
1.5.3 DEIS Comment Process	1-8
1.5.4 FEIS	1-9
1.6 Summary of Description of Alternatives	1-9
1.7 Additional Analysis	1-11
1.8 Summary of Key Findings, Impacts, and Potential Mitigation Measures	1-13
1.9 Significant Unavoidable Adverse Impacts	1-23
1.10 Significant Areas of Controversy and Uncertainty, and Issues to Be Resolved	1-24
1.11 Benefits and Disadvantages of Delaying the Proposed Action	1-24
CHAPTER 2 Preferred Alternative	2-1
2.1 Introduction and Purpose	2-1
2.2 FEIS Alternatives	2-4

2.2.1	Objectives	2-4
2.2.2	Alternative 0 (No Action)	2-4
2.2.3	Preferred Alternative	2-9
2.3	Comparison of Alternatives	2-17
CHAPTER 3	Land Use Patterns and Urban Form	3-1
3.1	Updates to the DEIS	3-1
3.2	Impacts	3-1
3.2.1	Comparison of Preferred Alternative and No Action Alternative	3-3
3.2.2	Preferred Alternative	3-13
3.2.3	No Action Alternative	3-17
3.3	Avoidance, Minimization, and Mitigation Measures	3-18
3.4	Significant Unavoidable Adverse Impacts	3-19
CHAPTER 4	Relationships to Plans and Policies	4-1
4.1	Updates to the DEIS	4-1
4.2	Impacts	4-1
4.2.1	Comparison of Preferred Alternative and No Action Alternative	4-2
4.2.2	Impacts of the Preferred Alternative	4-10
4.2.3	Impacts of the No Action Alternative	4-10
4.3	Avoidance, Minimization, and Mitigation Measures	4-10
4.4	Significant Unavoidable Adverse Impacts	4-10
CHAPTER 5	Population and Employment	5-1
5.1	Updates to the DEIS	5-1
5.2	Impacts	5-1
5.2.1	Comparison of Preferred Alternative and No Action Alternative	5-1
5.2.2	Impacts of the Preferred Alternative	5-9
5.2.3	Impacts of the No Action Alternative	5-9
5.3	Avoidance, Minimization, and Mitigation Measures	5-9
5.4	Significant Unavoidable Adverse Impacts	5-10
CHAPTER 6	Aesthetics	6-1
6.1	Updates to the DEIS	6-1
6.2	Impacts	6-6
6.2.1	Comparison of Preferred Alternative and No Action Alternative	6-6
6.2.2	Impacts of the Preferred Alternative	6-29
6.2.3	Impacts of the No Action Alternative	6-30
6.3	Avoidance, Minimization, and Mitigation Measures	6-30

- 6.4 Significant Unavoidable Adverse Impacts 6-30
- CHAPTER 7 Housing7-1**
- 7.1 Updates to the DEIS..... 7-1
- 7.2 Impacts..... 7-1
 - 7.2.1 Comparison of Preferred Alternative and No Action Alternative 7-2
 - 7.2.2 Preferred Alternative 7-8
 - 7.2.3 No Action Alternative 7-10
- 7.3 Avoidance, Minimization, and Mitigation Measures 7-10
- 7.4 Significant Unavoidable Adverse Impacts 7-11
- CHAPTER 8 Air Quality.....8-1**
- 8.1 Updates to the DEIS..... 8-1
- 8.2 Impacts..... 8-2
 - 8.2.1 Thresholds of Significance 8-2
 - 8.2.2 Long-Term Impacts of No Action and Action Alternatives 1, 2, and 3, and the Preferred Alternative 8-3
- 8.3 Mitigation Measures 8-7
 - 8.3.1 Incorporated Plan Features 8-7
 - 8.3.2 Construction Mitigation Measures 8-7
 - 8.3.3 Long-Term Mitigation Measures 8-8
- 8.4 Significant Unavoidable Adverse Impacts 8-9
- CHAPTER 9 Noise.....9-1**
- 9.1 Updates to the DEIS..... 9-1
- 9.2 Impacts..... 9-2
 - 9.2.1 Thresholds of Significance 9-2
 - 9.2.2 Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative 9-2
 - 9.2.3 Impacts of Alternative 0 (No Action) 9-5
 - 9.2.4 Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative 9-6
- 9.3 Mitigation Measures 9-7
 - 9.3.1 Incorporated Plan Features 9-7
 - 9.3.2 No Action Alternative (Alternative 0)..... 9-7
 - 9.3.3 Action Alternatives 1, 2, and 3 and the Preferred Alternative 9-8
- 9.4 Significant Unavoidable Adverse Impacts 9-8
- CHAPTER 10 Public Services and Utilities10-1**
- 10.1 Updates to the DEIS..... 10-1
- 10.2 Potential Impacts 10-1
 - 10.2.1 Thresholds of Significance 10-1

10.2.2	Comparison of Preferred Alternative and No Action Alternative	10-2
10.2.3	Alternative 0 (No Action)	10-8
10.2.4	Preferred Alternative	10-9
10.3	Avoidance, Minimization, and Mitigation Measures	10-9
10.3.1	Other Mitigation Measures	10-9
10.4	Significant Unavoidable Adverse Impacts	10-10
CHAPTER 11	Transportation	11-1
11.1	Updates to the DEIS	11-1
11.2	Potential Impacts	11-1
11.2.1	Planning Alternatives Evaluated	11-2
11.2.2	Thresholds of Significance	11-8
11.2.3	Impacts Common to All Alternatives	11-10
11.2.4	Alternative 0 (No Action)	11-22
11.2.5	Alternative 1	11-34
11.2.6	Alternative 2	11-47
11.2.7	Alternative 3	11-59
11.2.8	Preferred Alternative	11-74
11.2.9	Summary of Impacts	11-92
11.3	Avoidance, Minimization, and Mitigation Measures	11-94
11.3.1	Mobility Implementation Plan	11-96
11.3.2	Transportation Demand Management Strategies	11-99
11.3.3	Transportation Systems Operations and Management (Smart Mobility)	11-103
11.3.4	Agency Partnerships	11-104
11.3.5	Parking Strategies	11-105
11.3.6	Safety Strategies	11-107
11.3.7	Transportation Mitigation Measures	11-108
11.4	Significant and Unavoidable Adverse Impacts on Transportation	11-112
CHAPTER 12	Cumulative Impacts	12-1
12.1	Updates to the DEIS	12-1
12.2	Cumulative Impact Evaluation	12-1
CHAPTER 13	Distribution List	13-1
CHAPTER 14	References	14-1
	Chapter 1, Introduction and Summary	14-1
	Chapter 2, Preferred Alternative	14-3
	Chapter 3, Land Use	14-4
	Chapter 4, Plans and Policies	14-6
	Chapter 5, Population and Employment	14-7

Chapter 6, Aesthetics 14-8

Chapter 7, Housing..... 14-8

Chapter 8, Air Quality..... 14-11

Chapter 9, Noise 14-13

Chapter 10, Public Services and Utilities..... 14-13

Chapter 11, Transportation 14-17

CHAPTER 15 Corrections and Clarifications..... 15-1

15.1 Chapter 3, Land Use Patterns and Urban Form 15-1

15.2 Chapter 4, Plans and Policies..... 15-2

15.3 Chapter 5, Population and Employment 15-2

15.4 Chapter 8, Air Quality 15-5

15.5 Chapter 9, Noise..... 15-5

15.6 Chapter 10, Public Services and Utilities 15-5

15.7 Chapter 11, Transportation..... 15-5

15.8 Chapter 14, References 15-6

15.9 Appendices 15-6

15.9.1 DEIS Appendix B, Land Use Patterns and
Urban Form..... 15-6

15.9.2 DEIS Appendix C, Traffic Data 15-6

15.9.3 DEIS Appendix E, Plants and Animals
Memorandum 15-6

15.9.4 FEIS Appendix K, Transportation Preferred
Alternative..... 15-7

FEIS APPENDICES

APPENDIX C Traffic Data Revised

APPENDIX K Transportation Preferred Alternative

APPENDIX L Bellevue Housing Economic Policy Analysis: Phase 1

APPENDIX M Impact of Growth Alternatives on Tree Canopy,
Technical Report

APPENDIX N DEIS Comments and Responses

APPENDIX O Urban Tree Canopy Assessment

APPENDIX P Climate Vulnerability Assessment

APPENDIX Q Bellevue Emergency Housing Land Capacity Analysis

APPENDIX R Bellevue Affordable Housing Capacity Analysis,
Technical Report

FIGURES

FIGURE 1-1 City and Neighborhood Boundaries 1-4

FIGURE 1-2 Wilburton Study Area 1-5

FIGURE 2-1 Study Area 2-2

FIGURE 2-2 Alternative 0 (No Action) Future Land Use Map..... 2-6

FIGURE 2-3 Alternative 0 (No Action) Zoning Map..... 2-7

FIGURE 2-4 Preferred Alternative Future Land Use Map: Key 2-11

FIGURE 2-5 Preferred Alternative Future Land Use Map: Northeast..... 2-13

FIGURE 2-6 Preferred Alternative Future Land Use Map: Southeast..... 2-14

FIGURE 2-7 Preferred Alternative Future Land Use Map: Northwest..... 2-15

FIGURE 2-8 Preferred Alternative Future Land Use Map: Southwest..... 2-16

FIGURE 2-9 Net Housing and Job Capacity Citywide vs. Adopted Targets (2019–2044), All Alternatives 2-20

FIGURE 3-1 Net Capacity for Growth Citywide vs. Adopted Targets (2019–2044), All Alternatives..... 3-3

FIGURE 3-2 Net Housing Capacity by Location (2019–2044), All Alternatives 3-5

FIGURE 3-3 Net Job Capacity by Location (2019–2044), All Alternatives..... 3-5

FIGURE 3-4 Net Capacity for Growth in Commercial Square Footage by Location (2019–2044), All Alternatives..... 3-11

FIGURE 3-5 Net Housing Capacity by Mixed Use Center (2019–2044), All Alternatives..... 3-14

FIGURE 3-6 Net Job Capacity by Mixed Use Center (2019–2044), All Alternatives 3-15

FIGURE 5-1 Total Job Capacity (Citywide)..... 5-6

FIGURE 5-2 Total Jobs (Wilburton Study Area) 5-7

FIGURE 6-1 Alternative 0 (No Action): Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North..... 6-2

FIGURE 6-2 Alternative 1: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North 6-3

FIGURE 6-3 Alternative 2: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North 6-4

FIGURE 6-4 Alternative 3: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North..... 6-5

FIGURE 6-5 City of Bellevue Geographies 6-9

FIGURE 6-6 Preferred Alternative: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, looking north 6-11

FIGURE 6-7 Alternative 0 (No Action) Wilburton Study Area..... 6-13

FIGURE 6-8 Preferred Alternative: Wilburton Study Area 6-14

FIGURE 6-9 Alternative 0 (No Action): Bellevue Downtown Station (Looking East) 6-15

FIGURE 6-10 Preferred Alternative: Bellevue Downtown Station (Looking East) 6-15

FIGURE 6-11 Alternative 0 (No Action): NE 8th Street between 122nd and 123rd Avenues NE (Looking West) 6-16

FIGURE 6-12 Preferred Alternative: NE 8th Street between 122nd and 123rd Avenues NE (Looking West)..... 6-16

FIGURE 6-13 Alternative 0 (No Action): NE 5th Street East of 120th Avenue NE (Looking West) 6-17

FIGURE 6-14 Preferred Alternative: NE 5th Street East of 120th Avenue NE (Looking West) 6-17

FIGURE 6-15 Alternative 0 (No Action): Eastrail and NE 6th Street (Looking West)..... 6-18

FIGURE 6-16 Preferred Alternative: Eastrail and NE 6th Street (Looking West)..... 6-18

FIGURE 6-17 Alternative 0 (No Action): Eastrail and NE 4th Street (Looking North) 6-19

FIGURE 6-18 Preferred Alternative: Eastrail and NE 4th Street (Looking North) 6-19

FIGURE 6-19 Alternative 0 (No Action): NE 4th Street and 116th Avenue NE (Looking North)..... 6-20

FIGURE 6-20 Preferred Alternative: NE 4th Street and 116th Avenue NE (Looking North)..... 6-20

FIGURE 6-21 No Action Alternative: NE 4th Street and 120th Avenue NE (Looking West) 6-21

FIGURE 6-22 Preferred Alternative: NE 4th Street and 120th Avenue (Looking West) 6-21

FIGURE 6-23 Alternative 0 (No Action): Eastrail near Wilburton Hill Park (10 a.m., September 21)..... 6-23

FIGURE 6-24 Alternative 0 (No Action): Eastrail near Wilburton Hill Park (3 p.m., September 21)..... 6-23

FIGURE 6-25 Preferred Alternative: Eastrail near Wilburton Hill Park (10 a.m., September 21).....6-24

FIGURE 6-26 Preferred Alternative: Eastrail near Wilburton Hill Park (3 p.m., September 21).....6-24

FIGURE 6-27 Alternative 0 (No Action): Eastrail near Residential Development (10 a.m., September 21).....6-25

FIGURE 6-28 Alternative 0 (No Action): Eastrail near Residential Development (3 p.m., September 21).....6-26

FIGURE 6-29 Preferred Alternative: Eastrail and Residential Development (10 a.m., September 21).....6-26

FIGURE 6-30 Preferred Alternative: Eastrail and Residential Development (3 p.m., September 21).....6-27

FIGURE 6-31 Alternative 0 (No Action): Residential Development to the East (3 p.m., September 21).....6-28

FIGURE 6-32 Preferred Alternative: Residential Development to the East (3 p.m., September 21).....6-28

FIGURE 10-1 Four-Minute Response Zone with Station 1010-4

FIGURE 11-1 2022–2033 Transportation Facilities Planned Projects11-5

FIGURE 11-2 Future Frequent Transit Network11-6

FIGURE 11-3 Pedestrian Network Performance – All Alternatives with TFP Projects 11-11

FIGURE 11-4 Pedestrian Network Performance in the Wilburton Study Area – All Alternatives..... 11-14

FIGURE 11-5 Wilburton Study Area Draft TOD Access and Walkability Concepts Map..... 11-16

FIGURE 11-6 Bicycle Network Performance – All Alternatives with TFP Projects 11-17

FIGURE 11-7 Bicycle Network Performance in the Wilburton Study Area – All Alternatives..... 11-20

FIGURE 11-8 Transit Network Performance – No Action Alternative 11-24

FIGURE 11-9 System Intersection Performance – No Action Alternative 11-27

FIGURE 11-10 Primary Vehicle Corridor Travel Speed – No Action Alternative..... 11-30

FIGURE 11-11 Primary Vehicle Corridor System Intersection and Travel Speed Performance – No Action Alternative in the Wilburton Study Area Vicinity 11-32

FIGURE 11-12 Transit Network Performance – Alternative 1..... 11-36

FIGURE 11-13 System Intersection Performance –
Alternative 1 11-39

FIGURE 11-14 Primary Vehicle Corridor Travel Speed –
Alternative 1 11-41

FIGURE 11-15 Primary Vehicle Corridor System Intersection
and Speed Performance – Alternative 1 in the
Wilburton Study Area Vicinity 11-45

FIGURE 11-16 Transit Network Performance – Alternative 2..... 11-49

FIGURE 11-17 System Intersection Performance –
Alternative 2..... 11-52

FIGURE 11-18 Primary Vehicle Corridor Travel Speed –
Alternative 2..... 11-54

FIGURE 11-19 Primary Vehicle Corridor System Intersection
and Travel Speed Performance – Alternative 2
in the Wilburton Study Area Vicinity..... 11-57

FIGURE 11-20 Transit Network Performance – Alternative 3..... 11-61

FIGURE 11-21 System Intersection Performance –
Alternative 3..... 11-65

FIGURE 11-22 Primary Vehicle Corridor Travel Speed –
Alternative 3..... 11-67

FIGURE 11-23 Primary Vehicle Corridor System Intersection
and Travel Speed Performance – Alternative 3
in the Wilburton Study Area Vicinity (NE 6th
Street Extended to 116th Avenue NE)..... 11-71

FIGURE 11-24 Primary Vehicle Corridor System Intersection
and Travel Speed Performance – Alternative 3A
in the Wilburton Study Area Vicinity (NE 6th
Street Extended to 120th Avenue NE)..... 11-72

FIGURE 11-25 Transit Network Performance – Preferred
Alternative 11-76

FIGURE 11-26 System Intersection Performance – Preferred
Alternative 11-80

FIGURE 11-27 Primary Vehicle Corridor Travel Speed –
Preferred Alternative 11-83

FIGURE 11-28 Primary Vehicle Corridor System Intersection
and Speed Performance – Preferred
Alternative in the Wilburton Study Area
Vicinity (NE 6th Street Extension to 116th
Avenue NE)..... 11-87

FIGURE 11-29 Primary Vehicle Corridor System Intersection
and Corridor Travel Speed Performance –
Preferred A Alternative in the Wilburton

Study Area Vicinity (NE 6th Street Extension to 120th Avenue NE)..... 11-88

FIGURE 11-30 MIP Steps to Identify and Prioritize Project Concepts 11-97

TABLES

TABLE 1-1 Comparison of Project and Non-Project Environmental Review..... 1-8

TABLE 1-2 Summary of Impacts and Mitigation Measures of No Action and Preferred Alternative1-15

TABLE 2-1 Alternative 0 (No Action) Distribution of Growth and Summary of Housing Strategy2-5

TABLE 2-2 Alternative 0 (No Action) – Wilburton Study Area2-8

TABLE 2-3 Preferred Alternative – Wilburton Study Area2-18

TABLE 2-4 Distribution of Net Housing and Job Capacity by Alternative, Citywide.....2-19

TABLE 2-5 Distribution of Net Housing and Job Capacity by Alternative, Wilburton Study Area2-19

TABLE 2-6 Comparison of Citywide Alternative Features2-21

TABLE 3-1 Summary of Land Use Impacts by Alternative, Citywide.....3-2

TABLE 3-2 Summary of Land Use Impacts by Alternative, Wilburton Study Area3-2

TABLE 3-3 Percent Share of Citywide Total Housing and Jobs by Location (Existing + Capacity), All Alternatives.....3-6

TABLE 3-4 Percent Share of Mixed Use Center Total Housing and Jobs by Center (Existing + Capacity), All Alternatives.....3-6

TABLE 3-5 Existing Minimum and Maximum Parking Requirement by Zone.....3-8

TABLE 3-6 Net Capacity for Growth in Commercial Square Footage by Location, All Alternatives.....3-11

TABLE 4-1 Evaluation of Consistency with GMA Goals.....4-2

TABLE 4-2 Evaluation of Consistency with VISION 20504-4

TABLE 4-3 Evaluation of Consistency with CPPs Goals4-7

TABLE 4-4 Mixed Use Center Activity Units4-8

TABLE 5-1 Population and Employment Impacts Summary.....5-2

TABLE 5-2 Traffic and Contamination Proximity and Total Housing Unit Capacity5-8

TABLE 6-1	Summary of Aesthetic Impacts.....	6-7
TABLE 6-2	Impacts on Citywide Urban Form.....	6-10
TABLE 7-1	Summary of Housing Impacts by Alternative, Citywide	7-2
TABLE 7-2	Need and Capacity Comparison	7-4
TABLE 8-1	Diesel VMT and DPM Emissions by Alternative	8-3
TABLE 8-2	Project VMT and MTCO2e Emissions by Alternative	8-4
TABLE 9-1	Existing, No Action, and Future Potential Noise Levels (in dBA).....	9-4
TABLE 9-2	No Action, Action Alternatives 1, 2, and 3, and Preferred Alternative Potential Noise Levels (in dBA)	9-5
TABLE 11-1	Pedestrian Network Performance Target Results – All Alternatives with TFP Projects	11-12
TABLE 11-2	Bicycle Network Performance Target Results – All Alternatives with TFP Projects.....	11-18
TABLE 11-3	Mode Share – No Action Alternative	11-23
TABLE 11-4	VMT and VMT per Capita – No Action Alternative	11-23
TABLE 11-5	Transit Travel Time Ratio – No Action Alternative	11-24
TABLE 11-6	Vehicle Network Performance – System Intersections – No Action Alternative.....	11-26
TABLE 11-7	Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – No Action Alternative	11-29
TABLE 11-8	State Facility Performance –No Action Alternative	11-31
TABLE 11-9	Wilburton Study Area Vehicle Network Performance – System Intersections – No Action Alternative	11-33
TABLE 11-10	Mode Share – Alternative 1	11-34
TABLE 11-11	VMT and VMT per Capita – Alternative 1	11-35
TABLE 11-12	Transit Travel Time Ratio – Alternative 1	11-35
TABLE 11-13	Vehicle Network Performance – System Intersections – Alternative 1.....	11-37
TABLE 11-14	Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 1	11-42
TABLE 11-15	State Facility Performance – Alternative 1	11-43
TABLE 11-16	Wilburton Study Area Vehicle Network Performance – System Intersections – Alternative 1	11-46

TABLE 11-17	Mode Share – Alternative 2.....	11-47
TABLE 11-18	VMT and VMT per Capita – Alternative 2.....	11-48
TABLE 11-19	Transit Travel Time Ratio – Alternative 2.....	11-48
TABLE 11-20	Vehicle Network Performance – System Intersections – Alternative 2	11-50
TABLE 11-21	Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 2	11-55
TABLE 11-22	State Facility Performance – Alternative 2	11-56
TABLE 11-23	Wilburton Study Area Vehicle Network Performance – System Intersections – Alternative 2	11-58
TABLE 11-24	Mode Share – Alternative 3.....	11-59
TABLE 11-25	VMT and VMT per Capita – Alternative 3.....	11-60
TABLE 11-26	Transit Travel Time Ratio – Alternative 3.....	11-61
TABLE 11-27	Vehicle Network Performance – System Intersections – Alternative 3	11-63
TABLE 11-28	Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 3	11-68
TABLE 11-29	State Facility Performance – Alternative 3	11-69
TABLE 11-30	Wilburton Study Area Vehicle Network Performance – System Intersections – Alternatives 3 and 3A.....	11-70
TABLE 11-31	Mode Share – Preferred Alternative	11-74
TABLE 11-32	VMT and VMT per Capita – Preferred Alternative	11-75
TABLE 11-33	Transit Travel Time Ratio – Preferred Alternative	11-75
TABLE 11-34	Vehicle Network Performance – System Intersections – Preferred Alternative.....	11-77
TABLE 11-35	Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Preferred Alternative	11-84
TABLE 11-36	State Facility Performance – Preferred Alternative	11-85
TABLE 11-37	Wilburton Study Area Vehicle Network Performance – System Intersections – Preferred Alternative and Preferred A Alternative	11-89
TABLE 11-38	Summary of No Action Impacts and Significant Impacts Resulting from Action Alternatives.....	11-93
TABLE 11-39	Mitigation Measures for Impacts Resulting from Action Alternatives	11-110

Abbreviations and Acronyms

Abbreviation/Acronym	Definition
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
AADT	average annual daily traffic
ACS	American Community Survey
ADU	accessory dwelling unit
AHS	Affordable Housing Strategy
AMI	Area Median Income
ARCH	A Regional Coalition for Housing
ASIL	acceptable source impact level
BCC	Bellevue City Code
BIPOC	black, indigenous, people of color
BKR	Bellevue-Kirkland-
BR-CR	BelRed Commercial Residential
BR-GC	BelRed General Commercial
BR-MO-1	BelRed Medical Office
BRT	bus rapid transit
BTC	Bellevue Technology Center
CAC	Citizen Advisory Committee
CAPCOA	California Air Pollution Control Officers Association
CB	Community Business
CBA	community benefit agreement
CEQ	Council on Environmental Quality
CETA	Clean Energy Transformation Act
CHAS	Consolidated Housing Affordability Strategy
CIP	Capital Investment Program Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CPPs	King County Countywide Planning Policies
CPPU	Comprehensive Plan Periodic Update
CTR	Commute Trip Reduction
CVI	Climate Vulnerability Index

Abbreviation/Acronym	Definition
dB	decibel(s)
dba	A-weighted decibel(s)
DEIS	Draft Environmental Impact Statement
DNL	day-night average noise level
DPM	Diesel Particulate Matter
DS	Determination of Significance
EDNA	Environmental Designation for Noise Abatement
EIS	Environmental Impact Statement
EMFAC	Emission Factor (model)
EMS	emergency medical services
EMT	emergency medical technician
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
FAR	floor area ratio
FEIS	Final Environmental Impact Statement
FHWA	Federal Highway Administration
FIRE	finance, insurance, and real estate
FMR	Fair Market Rent
FTE	full-time equivalent
FTN	Frequent Transit Network
GC	General Commercial
GHG	greenhouse gas
GIS	geographic information system
GMA	Growth Management Act
GMPC	Growth Management Planning Council
GPS	global positioning system
HB	House Bill
HIN	High Injury Network
HOT	high occupancy toll
HOV	high-occupant vehicle
HUD	U.S. Housing and Urban Development
HVAC	heating, ventilation, and air conditioning

Abbreviation/Acronym	Definition
I-405	Interstate 405
I-90	Interstate 90
IOC	interim official control
IRP	Integrated Resource Plan
ITS	intelligent transportation systems
KCHA	King County Housing Authority
KSI	killed or seriously injured
LCA	Land Capacity Analysis
Ldn	day-night average noise level
LEED	Leadership in Energy & Environmental Design
L_{eq}	equivalent sound level
LID	low-impact development
L_{max}	maximum, instantaneous noise level
LOS	level of service
LTS	level of traffic stress
LUC	Land Use Code
LWSD	Lake Washington School District
MF	Multi Family
MFTE	Multi-family Tax Exemption
MI	Medical Institution
MIP	Mobility Implementation Plan
MPH	miles per hour
MPPs	multicounty planning policies
MTCO _{2e}	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NB	Neighborhood Business
NEPA	National Environmental Policy Act
NMU	Neighborhood Mixed Use
NO ₂	nitrogen dioxide
NOAH	naturally occurring affordable housing
NO _x	oxides of nitrogen

Abbreviation/Acronym	Definition
NTSS	Neighborhood Traffic Safety Services
O	Office
OFM	Washington State Office of Financial Management
OLB	Office Limited Business
OSS	on-site sewage
P&R	Park & Ride
PM	particulate matter
PM10	particulate matter less than 10 microns in diameter
PM2.5	particulate matter less than 2.5 microns in diameter
PMA	Performance Management Area
PO	Professional Office
ppm	parts per million
PSCAA	Puget Sound Clean Air Agency
PSE	Puget Sound Energy
PSH	Permanent Supportive Housing
PSRC	Puget Sound Regional Council
Q1	first quarter
R-20 and R-30	Multifamily Residential
RCW	Revised Code of Washington
RGC	Regional Growth Center
RMP	Risk Management Plan
ROW	right-of-way
RRFB	rectangular rapid flashing beacon
RSA	Road Safety Assessment
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SCADA	Supervisory Control and Data Acquisition
SCAP	Strategic Climate Action Plan
SEPA	State Environmental Policy Act
SF	Single Family
SMP	Shoreline Master Program
SO2	sulfur dioxide

Abbreviation/Acronym	Definition
SOV	single-occupant vehicle
SPU	Seattle Public Utilities
SQER	Small Quantity Emission Rate
SR 520	State Route 520
SRC	Shoreline Residential Canal
STC	Sound Transmission Class
TDM	transportation demand management
TFP	Transportation Facilities Plan
TMA	Transportation Management Association
TMP	Transportation Management Program
TNM	Traffic Noise Model
TOD	transit-oriented development
TRAP	traffic-related air pollution
TSMO	transportation systems management and operations
TSP	transit signal priority
UGA	urban growth area
UGC	King County Urban Growth Capacity
V/C	volume-to-capacity
VMT	vehicle miles traveled
VOC	volatile organic compound
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation
YTD	year to date

INTENTIONALLY BLANK

CHAPTER 1 Introduction and Summary

1.1 Introduction

The City of Bellevue is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA) and preparing the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement (EIS). The Draft EIS (DEIS) was issued in April 2023, and the city is now issuing the Final EIS (FEIS) with analysis of the Preferred Alternative.

Information and background on the Comprehensive Plan process and the EIS were included in Chapter 1, *Summary*, of the DEIS issued in April 2023 and that information is not repeated in the FEIS.

Following the issuance of the DEIS and review of comments received, the city developed and selected a Preferred Alternative. The No Action Alternative and the selected Preferred Alternative are now analyzed in this FEIS.

1.2 Organization of the FEIS

The DEIS lays the foundation for the initial environmental analysis that was conducted and is a companion document to this FEIS. The information provided in this FEIS attempts not to duplicate or repeat information presented in the DEIS, except to provide context to the reader. For example, the affected environment section of each chapter is not repeated, and the appendices provided with the DEIS are not repeated. Rather, the information in the FEIS includes a comparison

of the No Action Alternative and the Preferred Alternative, new appendices, a chapter on Corrections and Clarifications, and a chapter on Comments and Responses to Comments.

The exception to this is that several chapters needed to provide additional or updated information on other Action Alternatives in order to provide context or supplement what was in the DEIS. For example, the Transportation chapter was re-written to account for updates and revisions to the land use allocations modeled in the DEIS. As a result, the entire Chapter 11, *Transportation*, was provided in full in the FEIS along with the comparison of the No Action and the Preferred Alternative. Chapter 8, *Air Quality and Emissions*, and Chapter 9, *Noise*, were also updated to provide information about all of the Action Alternatives because of revisions that resulted from the changes to the land use allocations modeled in the DEIS.

The reader should refer to both the DEIS and the FEIS documents in order to obtain all of the information analyzed during the EIS process.

1.3 Project Purpose, Desired Outcomes, and Exclusions

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

The outcome of the project is to provide an update to the city's Comprehensive Plan that will meet state and regional requirements, the City Council's 2021 Vision, and other topics of importance to the community and City Council.

The update will include changes to Elements in Volume 1 of the Comprehensive Plan and Land Use Map Amendments. Volume 2 of the Comprehensive Plan (subarea plans) will be updated to incorporate map amendments and policies that would conflict with the Land Use Map amendments and/or other updates to Volume 1 policies.

The BelRed and Wilburton/NE 8th Street Subarea Plans will include more substantive changes to reflect the changes to these subareas in support of transit-oriented development within Bellevue's Growth Corridor.

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

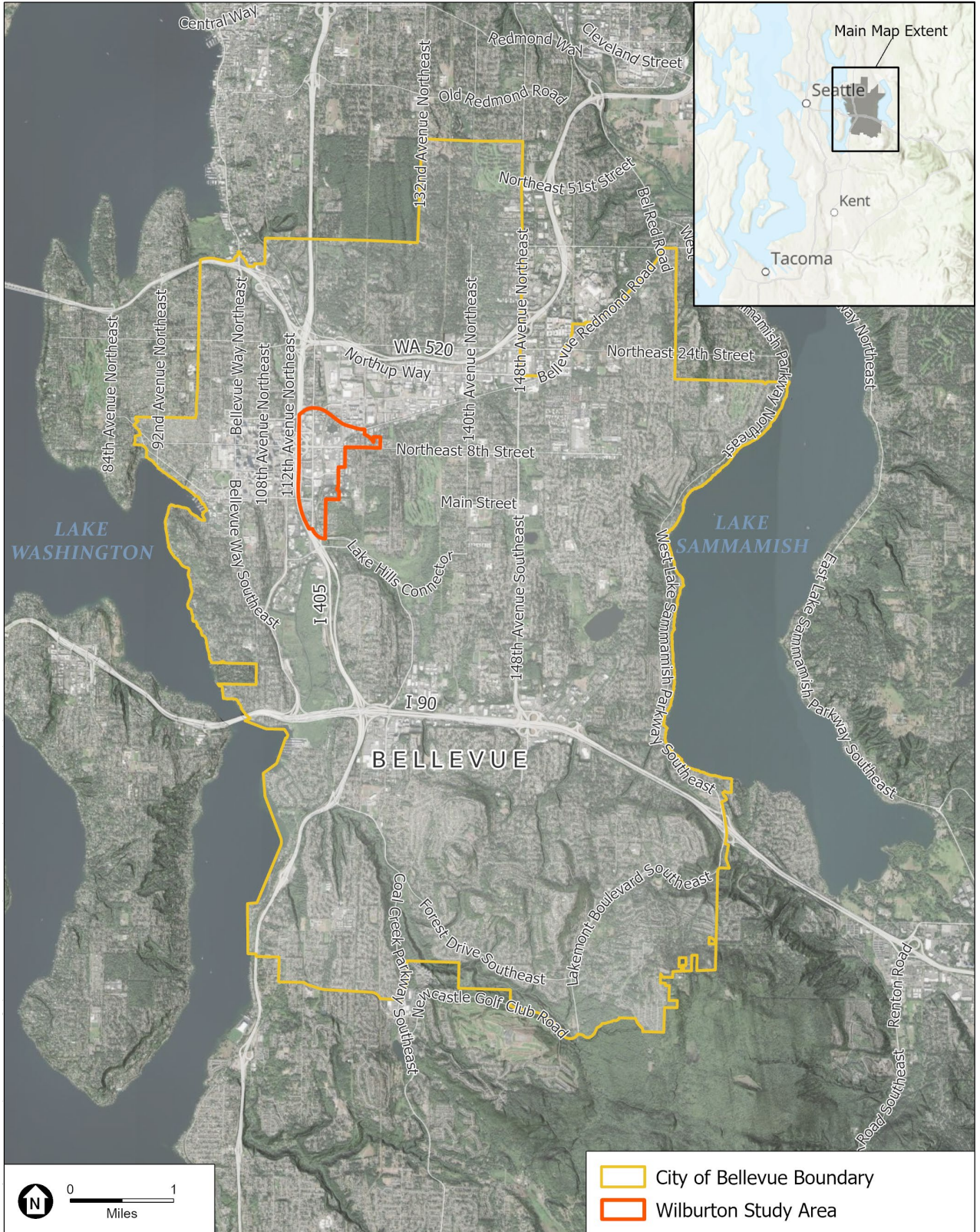
The following list identifies the primary requirements and desired outcomes of the Comprehensive Plan Update:

- Identify overarching growth target distribution approaches (housing + jobs).
- Evaluate impacts of growth distribution through an EIS.
- Recommend specific map amendments to achieve growth targets and other goals.
- Explore amending the land use classifications used in the Comprehensive Plan map to reference zones more broadly.
- Incorporate changes required by recent state legislation within the Housing Element, particularly related to housing choices, affordability levels, and distribution.
- Consider incorporating a new Climate and Resiliency Element and required related additions.
- Address equity throughout all Elements of the Comprehensive Plan, including addressing historic inequities and evaluating the impacts of current trends and planned amendments.
- Update the Comprehensive Plan to set the stage for future functional plans. The update will strive to make the Comprehensive Plan as clear and concise as possible as the guiding policy document for the city.

There are no known exclusions to the reporting on this project in this FEIS.

1.4 Study Area

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



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

FIGURE 1-1 City and Neighborhood Boundaries



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

FIGURE 1-2 Wilburton Study Area

1.5 SEPA Process and Public Involvement

1.5.1 Environmental Review Process

PROCESS

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

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

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

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

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

- **Scoping Stage:** Scoping is the first step in the EIS process; scoping for this EIS was held in September and October 2022 and

is described in more detail in Section 1.4.2 of the DEIS. During scoping, members of the public learned more about the Comprehensive Plan Periodic Update and Wilburton Vision Implementation process and the draft growth alternatives. The scoping stage for this proposal is complete, and a scoping summary report is found in Appendix A to the DEIS.

- **Draft Environmental Impact Statement (DEIS) Stage:** The EIS analyzed the particular environmental concerns that were identified during scoping. A separate analysis was prepared for each alternative. The purpose of the analysis was to estimate the nature, severity, and duration of impacts that might occur and to compare the impacts of the alternatives. The DEIS was made available to the public for review and comment. Comments were received on the analysis of the affected environment, the impact analysis for each of the alternatives included in the DEIS, and potential mitigation measures for each of the alternatives. Section 1.5.3 of this FEIS provides details on the public comment process for the DEIS.

This document is the FEIS, the final step, completing the environmental review of the Comprehensive Plan Periodic Update. Comprehensive Plan amendments and Land Use Code amendments for the Wilburton study area will be completed in 2024. The Comprehensive Plan Periodic Update is required to be adopted by December 2024.

NON-PROJECT EIS

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

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

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

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

PRIOR ENVIRONMENTAL REVIEW

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

- Wilburton Commercial Area Land Use and Transportation Project DEIS (February 2018), incorporation for background information and data.
- VISION 2050 Draft and Final Supplemental EIS (February 2019 and March 2020).
- City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation DEIS (April 2023).

1.5.2 Scoping

The scoping process and results were described in detail in Chapter 1 of the DEIS and are not repeated here.

1.5.3 DEIS Comment Process

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

Public and agency comments were invited on the DEIS. Written and verbal comments were invited during the 45-day public comment period following issuance of the DEIS. The city held public engagement events during the 45-day comment period to help inform the identification of the Preferred Alternative. Public comments were considered and addressed in this FEIS. The City of

Bellevue requested comments from citizens, agencies, tribes, and all interested parties on the DEIS during a 45-day period from April 27 to June 12, 2023.

Three public meetings were held, including one virtual meeting and two in-person meetings.

There was an opportunity to provide public comment and a court reporter was in attendance to transcribe comments.

A total of 346 emails or letters were received, and within that amount, more than 1,400 individual comments are responded to in this FEIS.

Meetings and comment periods regarding the proposals were described on the city's project webpage:

<https://bellevuewa.gov/2044-environmental-review>.

1.5.4 FEIS

This document is the FEIS and includes responses to public comments received during the DEIS comment period. The FEIS studies a Preferred Alternative. Following the EIS process, the city will develop specific edits to the Comprehensive Plan Land Use Map and Comprehensive Plan that will be the subject of public meetings and public hearings by the Planning Commission and City Council, and information will be posted on the project website when those dates are confirmed.

1.6 Summary of Description of Alternatives

Following the DEIS comment period, the Planning Commission considered the range of land use alternatives and public comments and made recommendations to the City Council regarding a Preferred Alternative to undergo additional analysis. Chapter 2, *Preferred Alternative*, presents the Preferred Alternative and compares it in greater detail to Alternative 0 (No Action), the current Comprehensive Plan. It also puts the Preferred Alternative in context with Action Alternatives studied in the DEIS. The Preferred Alternative for the city as a whole is a hybrid of all of the three DEIS Action Alternatives, with additional changes to incorporate capacity created under House Bill (HB) 1110 and HB 1337.

The Preferred Alternative includes additional capacity in Mixed Use Centers that is similar to a mix of Action Alternatives 2 and 3. It

would allow for development at heights similar to Action Alternative 3 in the centers of the mixed use areas with mid-rise and low-rise development at the edges to transition to the heights of adjacent areas.

The Preferred Alternative is evaluated by environmental topic in Chapters 3 through 11.

CITYWIDE ALTERNATIVES

The alternatives under consideration in the FEIS include the following:

- **Alternative 0 (No Action):** Continues the current plan with growth focused in Downtown, BelRed, and East Main Mixed Use Centers.
- **Preferred Alternative:** The Preferred Alternative for the city as a whole is a hybrid of all of the three Action Alternatives, with additional changes to incorporate capacity created under HB 1110 and HB 1337.

All alternatives can meet the total housing and jobs targets to 2044, with the Preferred Alternative providing the most housing capacity.

Alternative 0 does not meet other new planning requirements, including affordable housing across income bands and a range of housing types. The Preferred Alternative is intended to meet affordable housing requirements and new middle housing and accessory dwelling unit requirements of new legislation.

WILBURTON

The Wilburton study area is also evaluated across the following alternatives:

- **Alternative 0:** Housing capacity within the Wilburton study area would be small (less than 1 percent of the citywide total), and the Wilburton study area would have a modest share of citywide job capacity (5 percent) with no changes to allowed uses or building intensities.
- **Preferred Alternative:** The Wilburton study area would have 7 percent of total citywide housing unit capacity and would have capacity for 14 percent of total citywide job capacity.

1.7 Additional Analysis

The city conducted additional studies and analysis that will be helpful in their decision-making process during the Comprehensive Plan Periodic Update process. The following studies and reports are included as appendices to the DEIS document (Appendices A through J) and are not repeated in the FEIS. Appendix C has been updated since the issuance of the DEIS and is now titled Traffic Data Revised and is included in the FEIS for reference.

Appendices K through R have been prepared since issuance of the DEIS to provide additional analysis and are attached to this FEIS document:

- **Appendix A: Scoping Summary.**
- **Appendix B: Land Use Patterns and Urban Form Appendix.**
- **Appendix C: Traffic Data Revised.** DEIS Appendix C, *Traffic Data*, has been updated to account for updated information since the DEIS was issued. The alternatives assume a set of new transportation investments as adopted in the 2022–2033 Transportation Facilities Plan (TFP). The full TFP project list is included in FEIS Appendix C, *Traffic Data Revised*.
- **Appendix D: Historic Resources Survey.**
- **Appendix E: Plants and Animals Memo.**
- **Appendix F: Water Resources Memo.**
- **Appendix G: Relationship of Climate Change Vulnerability to the Alternatives.**
- **Appendix H: Equity and Environmental Sustainability Performance Metrics.**
- **Appendix J: Air Quality and Land Use Planning Report.**
- **Appendix K: Transportation Preferred Alternative.**
Appendix K, *Transportation Preferred Alternative*, has been added to the FEIS to provide a supplemental transportation analysis for a 2044 land use scenario for the Preferred Alternative that is based on the growth forecast for Bellevue. Chapter 11 analyzes growth to “build-out” capacity, meaning that developable or redevelopable parcels in the city would be developed or redeveloped to achieve the development potential allowed under the land use designation. Because it is not expected that this level of growth would all occur by 2044, Appendix K provides an analysis based on the 2044 growth forecast.

- **Appendix L: Bellevue Housing Economic Policy Analysis: Phase 1.** This first phase of a two-part study is an analysis of housing policy and programs relevant to affordable housing and to determine the impact of both voluntary and mandatory affordable housing programs on housing development. Phase 1 of the study includes an existing conditions report that describes 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.
- **Appendix M: Impact of Growth Alternatives on Tree Canopy, Technical Report.** As part of the 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.
- **Appendix N: DEIS Comments and Responses.** This appendix provides the comments on the DEIS and responses to each comment.
- **Appendix O: Urban Tree Canopy Assessment.** 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 were quantified; however, this analysis does not attempt to define species composition or condition. 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.
- **Appendix P: Climate Vulnerability Assessment.** 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.

- **Appendix Q: Bellevue Emergency Housing Land Capacity Analysis.** 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 RCW 36.70A.070(2) to require cities in Washington to identify sufficient capacity of land for emergency housing and emergency shelters. 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.
- **Appendix R: Bellevue Affordable Housing Capacity, Technical Report.** The 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 GMA to require the housing element to include explicit consideration of capacity for household needs and building types. This summary documents the process and results of the calculations done under this guidance.

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

One of the most important functions of an EIS is to identify potential impacts associated with a proposal and identify appropriate mitigation measures. The following sections describe how the EIS analyzed each element of the environment, what impacts have been identified, how the No Action and the Preferred Alternative differ from one another, and what measures are proposed to mitigate impacts. The analysis contained in the EIS will be used to guide city decision-makers.

Table 1-2 summarizes the results of the environmental evaluation of the No Action Alternative and the Preferred Alternative further detailed in FEIS Chapter 2, *Preferred Alternative*, and Chapters 3 through 12. Where impacts are identified, mitigation is provided in the form of incorporated plan features (e.g., components of the

alternatives that self-mitigate, such as design standards addressing height and bulk); regulations and commitments (e.g., critical areas regulations); and other potential mitigation measures that the city may consider applying through policies or other strategies to address potential impacts. The potential residual impacts, if any, following mitigation are also described. The reader is encouraged to review this summary section to find areas of interest, and to read the more-detailed analysis in the following chapters of the FEIS, as well as review the previously issued DEIS to have the full context of the affected environment, impact analysis, detailed mitigation measures, and overall findings.

TABLE 1-2 Summary of Impacts and Mitigation Measures of No Action and Preferred Alternative

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
	Capacity to add 41,000 housing units and 124,000 jobs	Capacity to add 216,000 housing units and 323,000 jobs
Chapter 3. Land Use Patterns and Urban Form	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	<p>Growth Targets: A moderately adverse impact related to other citywide housing growth requirements is expected under the No Action Alternative as it does not meet new planning requirements for affordable housing across income bands or a range of housing types.</p>	<p>Growth Targets: Citywide housing and job capacity are above the adopted target under all the alternatives. No adverse land use impacts are identified related to the growth targets under the Preferred Alternative with the application of additional measures to improve housing affordability and choice. Therefore, impacts would be less-than-significant.</p>
	<p>Land Use Compatibility: All alternatives include some amount of redevelopment with corresponding potential for land use compatibility impacts.</p>	<p>Land Use Compatibility: Same as Alternative 0 (No Action).</p>
	<p>Citywide, adverse land use compatibility impacts are expected under any of the alternatives but would be reduced to less-than-significant levels with the application of existing and proposed mitigation.</p>	<p>Displacement: Adverse residential and commercial displacement impacts are expected under the Preferred Alternative; potential displacement could occur under all alternatives. Affordability and choice throughout the city would be greater under the Preferred Alternative than the No Action Alternative, thus reducing the risk of involuntary residential displacement. In addition, the Preferred Alternative includes policies to support more affordable housing, and higher density housing in various parts of the city would make it easier and more economically feasible for private developers to incorporate affordable housing as part of market-rate development projects.</p>
	<p>Access to Community Assets: All alternatives would focus most future growth into the existing Mixed Use Centers, which have the highest concentration of amenities, diverse uses, and community gathering spaces. No adverse impacts regarding access to community assets are expected.</p>	<p>Access to Community Assets: Additional capacity in the low-density residential areas would adversely contribute to a land use pattern that increases demand for community gathering spaces for households and requires more investment to have equitable access to such features which would be an adverse impact.</p>
WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	
<p>Future land use patterns under the No Action Alternative would not support the incoming light rail station or planned investments in Eastrail, the Grand Connection, or 116th Avenue NE, and so a moderately adverse land use compatibility impact in the Wilburton study area is expected under the No Action Alternative.</p>	<p>The Preferred Alternative adds significant capacity in the Wilburton study area.</p>	
<p>Adverse residential and commercial displacement impacts in the Wilburton study area are expected under all alternatives.</p>	<p>The Preferred Alternative would support these investments within the Wilburton study area, but potential adverse compatibility impacts to the east and southeast are expected.</p>	
<p>No adverse impacts regarding access to community assets are expected in the Wilburton study area.</p>	MITIGATION MEASURES	
MITIGATION MEASURES	MITIGATION MEASURES	
<p><u>Citywide and Wilburton Study Area</u></p>	<p><u>Citywide</u></p>	
<p>1. The city could pursue the following types of actions for addressing possible future conditions, particularly related to commercial displacement impacts:</p> <ul style="list-style-type: none"> Consider amendments to zoning regulations in existing and future Mixed Use and Neighborhood Centers to address transitions more directly. See also Chapter 6, <i>Aesthetics</i>. Consider addressing transitions between Mixed Use and Neighborhood Centers and surrounding areas as part of ongoing neighborhood planning efforts. Consider selling or leasing city-owned property for projects that support affordable residential to reduce displacement impacts. Consider providing technical assistance to small businesses and entrepreneurs who are looking for affordable commercial space. This could include assistance with site selection, leasing negotiations, and financing. 	<p>1. Same as Alternative 0 (No Action).</p> <p><u>Wilburton Study Area</u></p> <p>2. The Preferred Alternative would require the development of new or revised zoning and development regulations for the city and Wilburton study area. New regulations would need to address permitted uses, dimensional requirements, a floor area ratio (FAR) amenity incentive system, the conversion of non-conforming uses and properties, parking and circulation, landscaping, and the development of streets and sidewalks. These regulations would need to be crafted with the intent of creating land use compatibility within and adjacent to the Wilburton study area.</p>	

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
	<ul style="list-style-type: none"> Consider incentives that encourage affordable commercial space for small businesses, especially in areas at high risk of displacement. For example, the city could reduce parking requirements in certain locations. Reducing parking standards for small businesses can also reduce the construction costs for new development. Also, consider setting average or maximum sizes for new ground floor spaces that result in space sizes that are more affordable for small businesses, which can facilitate small-business relocation and attraction. Ensure anti-displacement measures prior to designating new Neighborhood Centers in areas that currently lack access to essential services within a short distance that are also at high risk of displacement. Anti-displacement measures could include: <ul style="list-style-type: none"> Potential “right to return” policies that give preference to residential or small business uses that face displacement in redeveloping areas. Potential tenant relocation assistance: Demolition of existing housing to make way for new development may displace existing tenants who then incur moving costs. Local governments—authorized by WAC 365-196-835 and detailed in RCW 59.18.440—can pass an ordinance that requires developers, public funds, or a combination of the two to provide relocation funds for these displaced tenants. Tenants at or below 50 percent of the county median income, adjusted for family size, qualify for available funds. Resident relocation assistance as a result of public action is required, with details outlined in RCW 8.26. Potential community benefit agreements: Development agreements or community benefit agreements. These are voluntary, negotiated contracts between developers and municipalities or between developers and a community-based organization representing the interests of the community. They can support affordable housing, affordable commercial space, community gathering spaces, and other public amenities. Consider partnering with existing organizations or facilities to improve equitable availability of community gathering spaces across the Mixed Use and Neighborhood Centers and in transit-proximate areas outside of the centers. 	
Chapter 4. Plans and Policies	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Alternative 0 (No Action) would not include changes to Comprehensive Plan policies or regulations, so inconsistencies with state and regional goals and requirements to support affordable housing and a wider range of housing typologies would occur would result in a significant adverse impact .	Under the Preferred Alternative, conflicts with plans and policies would be avoided by amending the Comprehensive Plan. No significant adverse impact.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as above.
MITIGATION MEASURES	MITIGATION MEASURES	
None proposed.	<p><u>Citywide and Wilburton Study Area</u> No mitigation is required; however:</p> <ol style="list-style-type: none"> The Comprehensive Plan may need to consider additional guidance for each of the Mixed Use Centers to support additional development in those areas. Related system plans—such as the Land Use Code, Transit Master Plan, and the Storm and Surface Water System Plan—would need to be updated to ensure full consistency. The Preferred Alternative would require the development of new or revised zoning and development regulations for the city and Wilburton study area. Revisions may be considered in a phased approach as infrastructure and other services become available, and new zoning and development standards in the Wilburton study area would likely be informed by development standards established for other subareas. The Preferred Alternative should be in alignment with the GMA, VISION 2050, and King County CPPs. 	

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
Chapter 5. Population and Employment	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Under all alternatives, additional population and job growth would occur citywide and in the Wilburton study area. All the alternatives align to some extent with the city's Economic Development Plan, and no unavoidable conflicts are expected. Significant unavoidable adverse impacts on population and employment are not expected under any alternative.	Same as Alternative 0 (No Action).
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as Alternative 0 (No Action).
	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u></p> <p>1. No mitigation is required. Under Element 3 (<i>Land Use Patterns and Urban Form</i>) and Element 8 (<i>Air Quality and Greenhouse Gas Emissions</i>), the city could consider the following:</p> <ul style="list-style-type: none"> • Mitigate displacement of existing small businesses. The city could explore creating a program to ensure that affordable office and retail spaces are available. The programs could consider financial incentives (such as tax abatements similar to an office/retail equivalent of the Multi-family Tax Exemption), technical assistance and outreach, or the integration of office/retail affordability with livability initiatives. • Reduce exposure to contaminated sites and traffic. implement mitigation strategies, including reducing vehicle miles traveled (VMT), retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of contaminated sites and freeways. 	<p><u>Citywide</u></p> <p>1. Same as Alternative 0 (No Action).</p> <p><u>Wilburton Study Area</u></p> <p>2. No mitigation is required. However, same as for Alternative 0 (No Action) under Element 3 (<i>Land Use Patterns and Urban Form</i>) and Element 8 (<i>Air Quality and Greenhouse Gas Emissions</i>), the city could consider the following:</p> <ul style="list-style-type: none"> • Wilburton Study Area: Zoning and Development Regulations. The Preferred Alternative would require changes in zoning and development regulations in the Wilburton study area. This would be an opportunity for Bellevue to specify allowed uses in the Wilburton study area to best align with the city's Economic Development Plan.
Chapter 6. Aesthetics	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers, and under the Action Alternatives, in Neighborhood Centers and near transit. This growth will, in turn, have significant adverse impacts from shadows, views, and light and glare. These impacts are to be expected as Bellevue continues to grow, especially in the context of regional transit investments and development interests.	Additional growth would result in impacts on the built form citywide , particularly in Mixed Use Centers and under the Preferred Alternative.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	The character of the Wilburton study area would change to a much denser area with much taller buildings. No significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.	Same as Alternative 0 (No Action).
	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u></p> <ul style="list-style-type: none"> • No mitigation is proposed. 	<p><u>Citywide and Wilburton Study Area:</u></p> <p>Same as Alternative 0 (No Action) with the following additions:</p> <ul style="list-style-type: none"> • Low-Density Residential Development Regulations. The Preferred Alternative would allow gentle density increases across the city. As new residential uses are added to the zoning code, Bellevue would have an opportunity to regulate scale and form. • Wilburton Study Area: Zoning and Development Regulations. The Preferred Alternative in the Wilburton study area would require changes to the zoning and development regulations. These regulations would address permitted uses, dimensional requirements, a FAR amenity incentive system, conversion of non-conforming uses and properties, pedestrian comfort, parking and circulation, landscaping, and the development of streets and sidewalks.

<p>Element of the Environment (EIS Chapter)</p>	<p>Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers</p>	<p>Preferred Alternative</p>
		<ul style="list-style-type: none"> Wilburton Study Area: Design Guidelines The Preferred Alternative would include design guidelines specific to the Wilburton study area. These would likely include standards related to building design, pedestrian experience and streetscapes, public spaces, and mixed use building features, in addition to other standards. These could include standards for towers, such as locating them farther from the street, making podiums shorter, or orienting towers to maximize solar access.
<p>Chapter 7. Housing</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>The No Action Alternative continues existing regulations, incentives, and programs targeted at affordability. Recent development trends have shown decreases in affordability despite these existing tools. Without additional strategies for affordability, the No Action Alternative will likely have a significant adverse impact on housing affordability compared to Action Alternatives.</p> <p>Significant adverse impacts related to an increased risk for involuntary residential displacement are expected under the No Action Alternative.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>No adverse impacts on supply or diversity are anticipated for the No Action Alternative.</p> <p>Significant adverse impacts on housing affordability in the Wilburton study area are expected under the No Action Alternative.</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p><u>Citywide and Wilburton Study Area</u></p> <ul style="list-style-type: none"> Mitigation measures include those described in DEIS Section 3.4, <i>Avoidance, Minimization, and Mitigation Measures</i>. These include existing regulations and commitments as well as incorporated plan features. 	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>The Preferred Alternative integrates additional anti-displacement strategies like inclusionary housing to mitigate the impacts of displacement and supply more affordable housing overall. The city could also consider additional strategies to avoid or mitigate displacement including neighborhood stabilization efforts such as rental assistance programs, foreclosure assistance programs, as well as tenant protection policies. With the application of these mitigation measures, no significant adverse impacts are expected for the Preferred Alternative. The Preferred Alternative would provide adequate capacity citywide, and have higher potential to provide a range of housing types, so no significant adverse housing impacts related to supply, and diversity are anticipated.</p> <p>The Preferred Alternative without targeted strategies for affordability, has the potential to have significant adverse impacts on housing affordability. This is anticipated for special needs housing as well, primarily for transient emergency housing which, unlike non-transient emergency housing, is regulated as a Homeless Services Use in the city. Given this, significant adverse impacts are expected for affordability under the Preferred Alternative.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Same as No Action.</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p><u>Citywide and Wilburton Study Area</u></p> <p>Mitigation measures include those described in DEIS Section 3.4, <i>Avoidance, Minimization, and Mitigation Measures</i>. These include existing regulations and commitments as well as incorporated plan features. The Preferred Alternative also includes significant additional capacity for new housing in low-density residential areas as a result of additional changes to incorporate capacity created under HB 1110 and HB 1337. Significant adverse impacts on affordability are anticipated under the Preferred Alternative. These impacts can be mitigated through the adoption of targeted affordability strategies, including mandatory inclusionary zoning and targeted funding</p> <p><u>Wilburton Study Area</u></p> <p>The Preferred Alternative would require the development of new or revised zoning and development regulations for the Wilburton study area. New zoning associated with this alternative is expected to be similar to rules established for the BelRed area in part 20.25D of the Land Use Code. New regulations will need to address the provision of affordable housing and the potential for residential displacement. These regulations will need to be crafted with the intent of creating affordable housing and to avoid or mitigate residential displacement.</p>

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
Chapter 8. Air Quality	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	The impacts from construction with the No Action Alternative will result in a less-than-significant impact on air quality and greenhouse gases (GHGs).	The Preferred Alternative would result in potentially significant unavoidable adverse impacts on air quality.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as above.
	MITIGATION MEASURES	MITIGATION MEASURES
	<u>Citywide and Wilburton Study Area</u>	<u>Citywide and Wilburton Study Area</u>
	Construction:	Construction: Same as No Action.
	1. For temporary impacts during construction, construction site owners and/or operators are required to take reasonable precautions to prevent fugitive dust from becoming airborne. Fugitive dust may become airborne during demolition, material transport, grading, driving of vehicles and machinery on and off the site, and from wind.	Long-Term:
	Controlling fugitive dust emissions may require some of the following actions:	1. A variety of air and GHG mitigation measures can be implemented to reduce the exposure of residents. The following measures could be applied to the Preferred Alternative to reduce air exposures:
	<ul style="list-style-type: none"> • Spray exposed soil with water or other suppressant to reduce emissions and deposition of particulate matter. • Use phased development to keep disturbed areas to a minimum. • Use wind fencing to reduce disturbance to soils. • Minimize dust emissions during transport of fill material or soil by wetting down the load, covering the load, or by ensuring adequate freeboard (space from the top of the material to the top of the truck bed) on trucks. • Promptly clean up spills of transported material on public roads. • Schedule work to minimize disruption of the existing vehicle traffic on streets. • Restrict traffic on-site to reduce soil upheaval and the transport of material to roadways. • Locate construction equipment and truck staging areas away from sensitive receptors as practical and in consideration of potential impacts on other resources. • Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways. • Cover dirt, gravel, and debris piles to reduce dust and wind-blown debris. 	<ul style="list-style-type: none"> • Land use buffers and project-specific mitigation measures to limit exposures to emissions sources such as high-capacity roadways. • Implement mitigation strategies, including reducing VMT, retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of freeways. • Promote the use of high-efficiency ventilation on residential facilities that are within 1,500 feet of major roadways. Limit sensitive uses in multi-story buildings for the floors that are at or near roadway level. • Enhance the air monitoring network or providing modeling in Bellevue to enable the community to characterize their exposures more accurately. Prioritize highly burdened regions such as the Wilburton study area. • Continue to prioritize low-emissions transportation modes through the development of additional bike/walk pathways, rideshare programs, and other travel demand strategies. • Identify opportunities to use roadside barriers to reduce exposure to air pollution and to provide the related benefit of reduced noise. • Decking and lids over highways may also reduce exposures by consolidating emissions releases to certain locations or limiting releases in certain areas. • Produce air quality-specific policies that promote a uniform approach to reducing exposures in Bellevue's future developments.
	2. Emissions of particulate matter, ozone precursors (e.g., volatile organic compounds and nitrogen oxides), sulfur oxides, and carbon monoxide would be minimized whenever reasonable and possible. Since these emissions primarily result from construction equipment, machinery engines would be kept in good mechanical condition to minimize exhaust emissions. Additionally, contractors would be encouraged to reduce idling time of equipment and vehicles and to use newer construction equipment or equipment with add-on emissions controls.	

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
Chapter 9. Noise	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Under all alternatives, noise would occur citywide and in the Wilburton study area. Transportation noise impacts would be less-than-significant , and noise from stationary sources and loading docks associated with commercial uses would be less-than-significant with mitigation. Therefore, there would be no significant and unavoidable noise impacts.	Same as Alternative 0 (No Action). Also, under the Preferred Alternative, development of new noise-sensitive uses in proximity to freeways could expose people to noise levels in excess of the 67 A-weighted decibels (dBA) residential Noise Abatement Criteria (NAC) and be less-than-significant with mitigation.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as above.
Chapter 10. Public Services and Utilities	MITIGATION MEASURES	MITIGATION MEASURES
	<u>Citywide and Wilburton Study Area</u> Stationary: 1. Compliance with the Class B Commercial Maximum Permissible Noise Levels of Bellevue City Code (BCC) 9.18.030. Methods of achieving these standards include using low-noise-emitting heating, ventilation, and air conditioning (HVAC) equipment, locating HVAC and other mechanical equipment within a rooftop mechanical penthouse, and using shields and parapets to reduce noise levels to adjacent land uses. For commercial loading docks, specific design measures could be implemented that may include but are not limited to shielding from features integrated into site design, and/or restrictions on hours for commercial deliveries within commercial and mixed use areas.	<u>Citywide and Wilburton Study Area</u> 1. Same as Alternative 0 (No Action). Siting Noise-Sensitive Uses: 2. Construction of new noise-sensitive land uses should either provide a buffer distance commensurate with the distances provided in Chapter 9 or project plans should be reviewed by a qualified acoustical consultant to ensure that appropriate construction upgrades (typically higher-rated Sound Transmission Class values for windows) are specified to ensure compliance with the interior noise criterion of 45 dBA, day-night average sound level (Ldn).
	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Under all alternatives, additional population and job growth would occur citywide and in the Wilburton study area. Effects on population growth on public services and utilities could be mitigated through the strategies in Section 10.4.1 of the DEIS. Therefore, significant unavoidable adverse impacts on public services and utilities are not expected under any alternative. The growth planned for the area would be incremental. Through the capital facilities planning process, the City of Bellevue would continue to address changes in public services and utilities. The school districts would continue to address changes in student enrollment.	Same as Alternative 0 (No Action).
Chapter 10. Public Services and Utilities	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as Alternative 0 (No Action).
	MITIGATION MEASURES	MITIGATION MEASURES
	<u>Citywide and Wilburton Study Area</u> No mitigation measures are required.	Same as Alternative 0 (No Action).

Element of the Environment (EIS Chapter)	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Preferred Alternative
Chapter 11. Transportation	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	<p>All alternatives are expected to have significant impacts on System Intersection volume-to-capacity (V/C), Primary Vehicle Corridor travel speed, and state facilities (with other potential impacts expected to be at a less-than-significant level).</p> <p>While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities would remain [and be significant and unavoidable].</p> <p>Alternative 0 (No Action) impacts 19 of 134 System Intersections, 14 of 95 Primary Vehicle Corridors, and 3 of 7 state facility study segments.</p>	<p>Same as Alternative 0 (No Action), but the Preferred Alternative impacts 70 of 134 System Intersections, 24 of 95 Primary Vehicle Corridors, and 4 of 7 state facility study segments.</p>
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	<p>Alternative 0 impacts two System Intersections and one Primary Vehicle Corridor.</p>	<p>The Preferred Alternative impacts 11 System Intersections and three Primary Vehicle Corridors.</p>
	MITIGATION MEASURES	MITIGATION MEASURES
	<p>To successfully accommodate the planned growth included in each of the alternatives and mitigate transportation impacts, Bellevue, in partnership with developers and other agencies, will need to implement a broad spectrum of the improvements and strategies: <i>Mobility Implementation Plan; Transportation Demand Management, Smart Mobility, Agency Partnerships, Parking strategies; and Safety strategies.</i> Mitigation measures are informed by the context of Performance Management Areas (PMAs).</p> <p>Mitigation Measure M-TR-1: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 1 PMAs. Key mitigation measures Bellevue should consider in Type 1 PMAs are included in detail in Chapter 11, <i>Transportation.</i></p> <p>Mitigation Measure M-TR-2: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 2 PMAs. Key mitigation measures Bellevue should consider in Type 2 PMAs are included in detail in Chapter 11, <i>Transportation.</i></p> <p>Mitigation Measure M-TR-3: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 3 PMAs. Key mitigation measures Bellevue should consider in Type 3 PMAs are included in detail in Chapter 11, <i>Transportation.</i></p> <p>Mitigation Measure M-TR-4: Impacts on state facility level of service (LOS). Key mitigation measures Bellevue should consider are included in detail in Chapter 11, <i>Transportation.</i></p> <p>As development occurs, Bellevue will determine the capital and programmatic improvements best suited to address the conditions that materialize. Capital projects will be identified in the Transportation Facilities Plan; the Transportation Facilities Plan is updated every 2 to 3 years.</p>	<p>Same as Alternative 0 (No Action).</p>

INTENTIONALLY BLANK

1.9 Significant Unavoidable Adverse Impacts

The implementation of either the No Action Alternative or the Preferred Alternative would result in the following significant unavoidable adverse impacts for the following elements of the environment:

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

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

Key environmental issues and options facing decision-makers include:

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

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

No known issues need to be resolved.

1.11 Benefits and Disadvantages of Delaying the Proposed Action

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

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

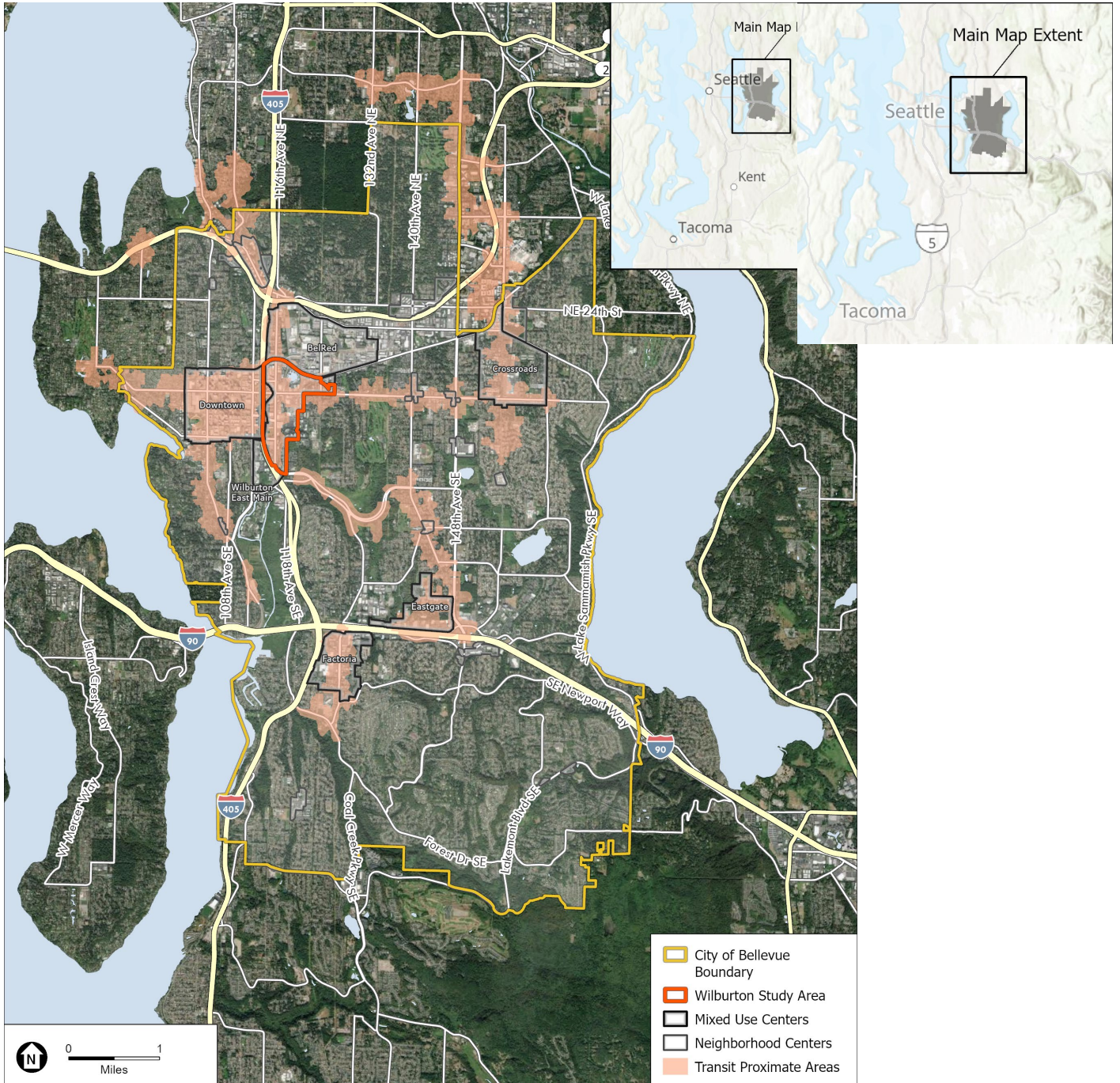


CHAPTER 2 Preferred Alternative

2.1 Introduction and Purpose

The City of Bellevue is updating its Comprehensive Plan in accordance with the Growth Management Act (GMA) and regional plans and policies, including the Puget Sound Regional Council's VISION 2050 (PSRC 2020) and the King County Countywide Planning Policies (King County 2023). To address periodic update requirements, the city has developed amended Comprehensive Plan elements and is proposing implementing code amendments. In addition to addressing the full city limits in its Comprehensive Plan, the city is updating the Wilburton/NE 8th Street Subarea Plan and Land Use Code to facilitate transit-oriented development in the Wilburton study area. See **Figure 2-1**.

Following the DEIS comment period, the Planning Commission considered the range of land use alternatives and public comments and made recommendations to the City Council regarding a Preferred Alternative. This chapter presents the Preferred Alternative and compares it in greater detail to Alternative 0 (No Action), the current Comprehensive Plan. It also puts the Preferred Alternative in context with the Action Alternatives evaluated in the DEIS. The Preferred Alternative is evaluated by environmental topic in Chapters 3 through 11 of this FEIS.



SOURCES: City of Bellevue 2023; ESA 2023; BERK 2023

NOTE: Transit-proximate areas are based on the 2021 BRT network (does not include future bus or light rail).

FIGURE 2-1 Study Area

CITYWIDE ALTERNATIVES

The alternatives under consideration in the FEIS include the following:

- **Alternative 0 (No Action):** Continues the current Comprehensive Plan, with growth focused in Downtown, BelRed, and East Main Mixed Use Centers.
- **Preferred Alternative:** The Preferred Alternative for the city as a whole is a hybrid of all of the three Action Alternatives evaluated in the DEIS, with additional changes to incorporate capacity created under HB 1110 (which is about middle housing) and HB 1337 (which is about Accessory Dwelling Units [ADUs]).

All alternatives can meet the total housing and jobs targets to 2044, with the Preferred Alternative providing the most housing capacity.

Alternative 0 does not meet other new planning requirements, including affordable housing across income bands and a range of housing types. The Preferred Alternative is intended to meet affordable housing requirements and new middle housing and accessory dwelling unit requirements of new legislation. Middle housing, according to the state's definition in HB 1110, means buildings that are compatible in scale, form, and character with single-family houses and contain two or more attached, stacked, or clustered homes; examples include duplexes and multiplexes, townhouses, stacked flats, courtyard apartments, and cottage housing.

WILBURTON

The Wilburton study area is also evaluated across the following alternatives:

- **Alternative 0:** Housing capacity within the Wilburton study area would be small (less than 1 percent of the citywide total), and the Wilburton study area would have a modest share of citywide job capacity (5 percent) with no changes to allowed uses or building intensities.
- **Preferred Alternative:** The Wilburton study area would have 7 percent of total citywide housing unit capacity and would have capacity for 14 percent of total citywide job capacity.

2.2 FEIS Alternatives

2.2.1 Objectives

The Comprehensive Plan Update and associated plans and code are meant to achieve the following objectives, which are further detailed in the DEIS:

- Housing: Diversity and Choice
- Connection: Places and Spaces
- Environment: Sustainability and Climate
- Access: Transportation, Mobility and Land Use

Based on a 2015 visioning process, a Citizen Advisory Committee developed a vision for the Wilburton study area, which serves as an objective along with other City Council objectives listed in the DEIS:

Our vision is that the Wilburton Commercial Area become Bellevue's next urban mixed-use community that enhances livability, promotes healthy living, supports economic vitality, and serves the needs of a diverse and growing population. As Bellevue's cultural and innovative hub, it serves as a regional and international destination that connects people and fosters community by leveraging its existing assets to define a distinctive sense of place and character.

2.2.2 Alternative 0 (No Action)

CITYWIDE

Alternative 0 (No Action Alternative): Citywide, this alternative continues the current Comprehensive Plan last updated in 2015. The current plan's growth strategy focuses the majority of new capacity in both Bellevue's Downtown, a designated Metropolitan and Regional Growth Center, and BelRed and East Main, which are areas where new light rail investments have been made. Less growth is planned for other mixed use areas in the city. Under Alternative 0 (No Action), the city would have capacity for 41,000 new housing units, which is 6,000 above the 35,000 housing target established in the King County

Countywide Planning Policies (2021). The current plan and regulations would have capacity for 124,000 new jobs, which is 54,000 above the 70,000 target in the King County CPPs. Housing and job capacity used in this EIS analysis are higher under the No Action Alternative than the capacity that was reported in King County's 2021 Urban Growth Capacity (UGC) Report. However, while net housing and job capacity are above the adopted growth targets, the No Action Alternative does not meet other new planning requirements, including affordable housing across income bands and a range of housing types.

The growth distribution and housing strategy for Alternative 0 (No Action) is provided in **Table 2-1**.

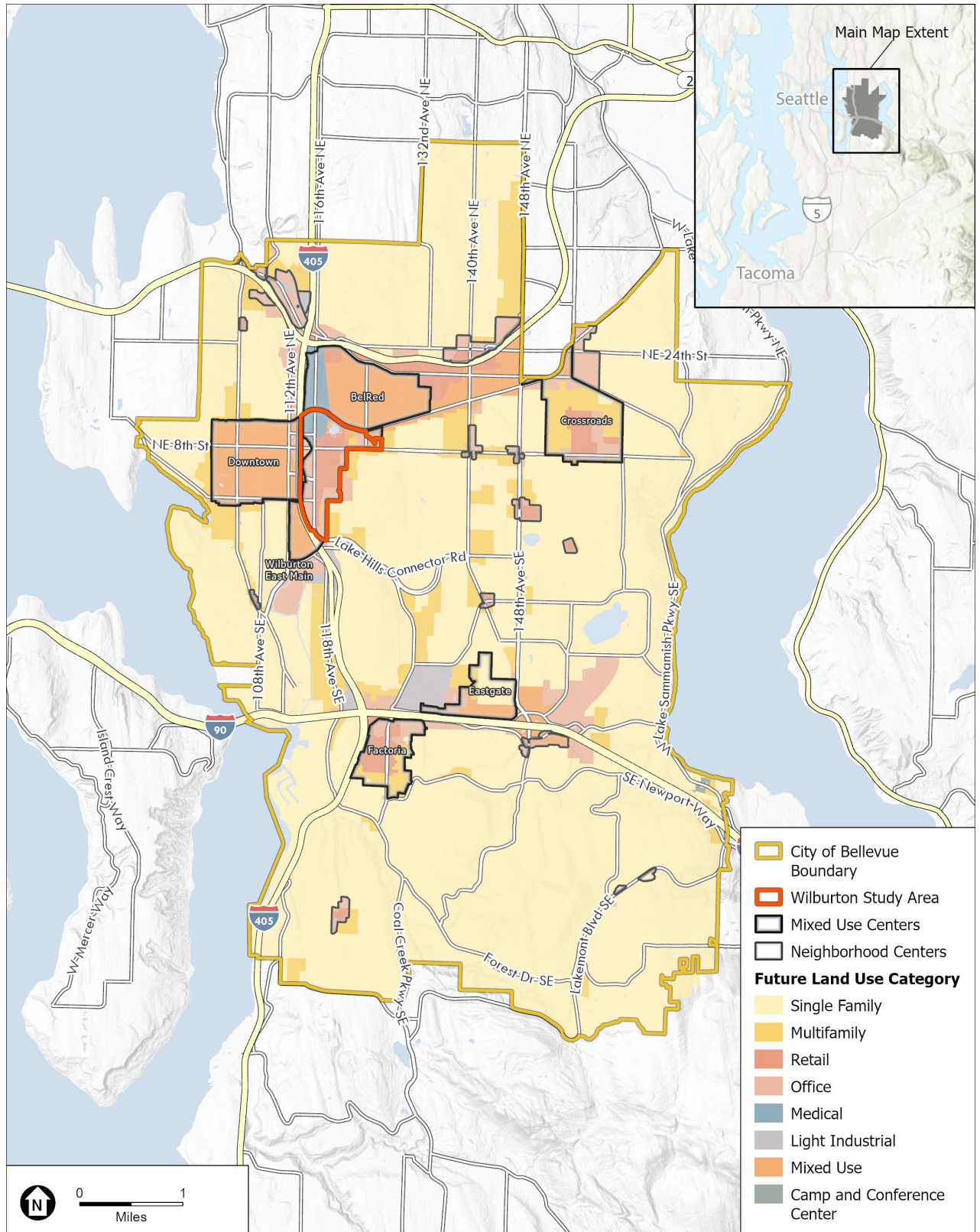
TABLE 2-1 Alternative 0 (No Action) Distribution of Growth and Summary of Housing Strategy

Growth Level and Pattern	Housing
<ul style="list-style-type: none"> Capacity for an additional 41,000 housing units. Capacity for an additional 124,000 jobs. Capacity for an additional 40.0 million square feet of commercial development. <p>FOCUS OF GROWTH: Primarily within Downtown, BelRed, and East Main. No changes to city's existing growth framework.</p>	<p>HOUSING TYPOLOGIES: Primarily residential buildings with studios and one-bedroom units, not meeting planning requirements for housing.</p> <p>HOUSING AFFORDABILITY: Voluntary inclusionary affordability incentives allow extra density to market-rate projects in exchange for affordable units, generally 5%–10% of projects.</p> <p>HOUSING STRATEGY: This alternative is required under SEPA as a baseline for analyzing the Action Alternatives. It meets the adopted housing and job targets but does not meet the city's new planning requirements, including affordable housing across income bands, or a range of housing types.</p> <p>This alternative is based on current capacity for housing and jobs. The city's existing plans, policies, and regulations would continue without changes. This alternative serves as a baseline against which the other alternatives can be measured. There would be no changes to the designations on the Land Use Map and no policy, zoning, or regulation changes.</p>

SOURCES: City of Bellevue 2023; BERK 2023

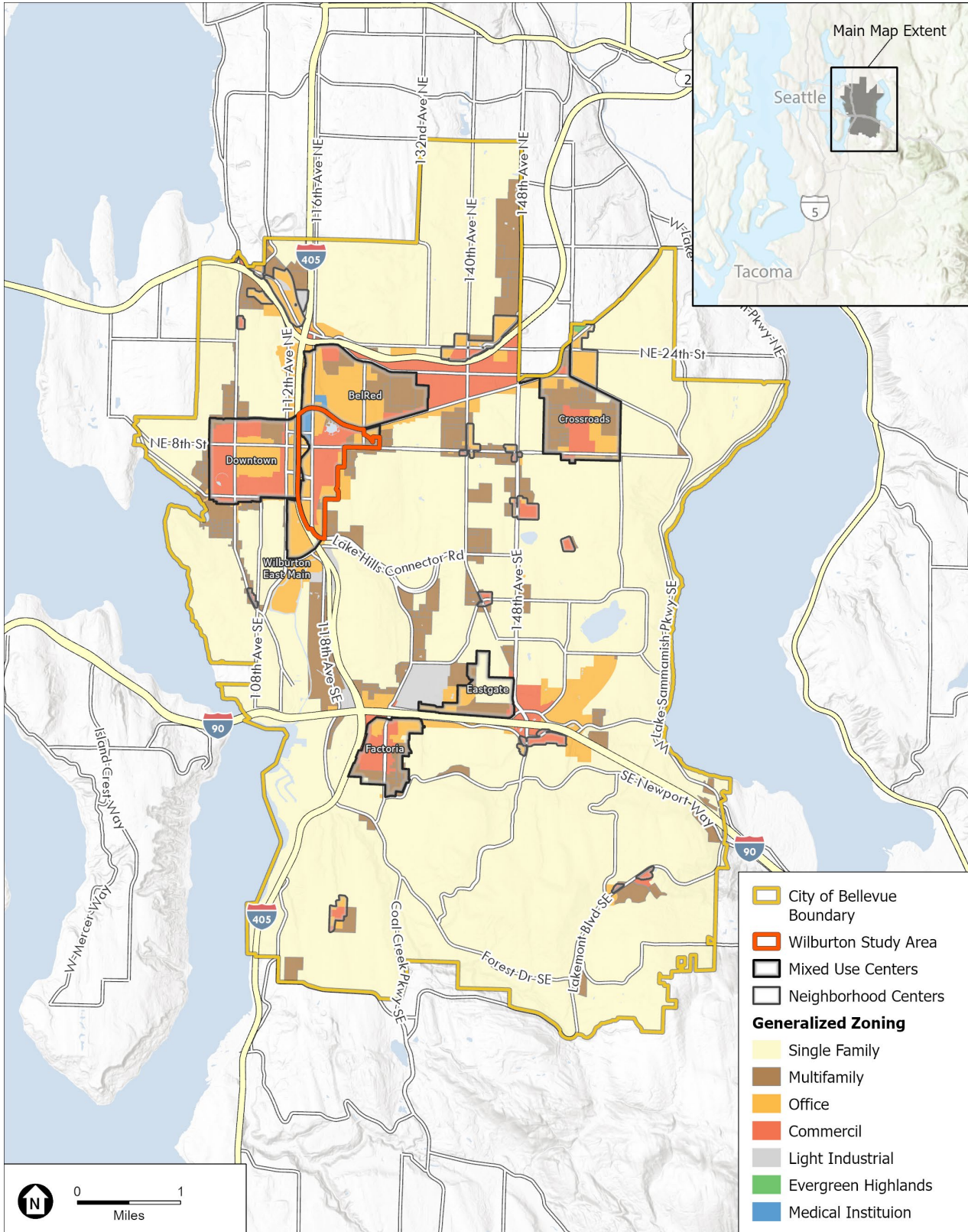
NOTE: Housing and job capacity estimates are rounded to the nearest 1,000. Commercial square footage capacity is rounded to the nearest 100,000. The actual pace of growth could differ and be more or be less than what is shown.

The Alternative 0 Future Land Use Map shows a broader pattern of single-family residential with mixed use centers in several nodes. See **Figure 2-2**. A generalized zoning map follows and shows similar patterns as the Future Land Use Map. See **Figure 2-3**.



SOURCE: City of Bellevue 2023

FIGURE 2-2 Alternative 0 (No Action) Future Land Use Map



SOURCE: City of Bellevue 2023

FIGURE 2-3 Alternative 0 (No Action) Zoning Map

WILBURTON

Under the No Action Alternative, the **Wilburton study area** would also retain current policies and codes that provide minimal housing capacity (less than 1 percent of the gross citywide total) and modest employment capacity (5 percent of the gross citywide total). See **Table 2-2**.

TABLE 2-2 Alternative 0 (No Action) – Wilburton Study Area

Growth Level and Pattern	Transportation and Building Form
<ul style="list-style-type: none"> Capacity for an additional 300 housing units. Capacity for an additional 3,900 jobs. Capacity for an additional 1.4 million square feet of commercial development. <p>Focus of Growth: No changes to the designations on the Land Use Map, and there would be no policy, zoning, or regulation changes. Housing and employment growth occurs within current capacity.</p>	<p>TRANSPORTATION:</p> <ul style="list-style-type: none"> No changes to planned transportation investments; includes NE 6th St extended between I-405 and 116th Ave NE. <p>LAND USE MIX:</p> <ul style="list-style-type: none"> Primarily commercial, office, and medical uses with limited residential. <p>DEVELOPMENT INTENSITY:</p> <ul style="list-style-type: none"> Assumes maximum building heights based on the current Comprehensive Plan Land Use Map and zoning. Building heights between 7 and 15 stories in the BR-CR, NMU, and BR-MO-1 districts and heights up to 4 to 5 stories in the other districts. <p>HOUSING TYPOLOGIES AND LOCATIONS:</p> <ul style="list-style-type: none"> Combination of low- and mid-rise residential buildings in limited areas ranging from 3 to 6 stories.

SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Housing and job capacity estimates are rounded to the nearest 100. Commercial square footage capacity is rounded to the nearest 100,000. The actual pace of growth could differ or be less than what is shown. See Chapter 3, *Land Use Patterns and Urban Form*, for a full description of existing zoning.

2.2.3 Preferred Alternative

CITYWIDE

The Preferred Alternative for the **city as a whole** is a hybrid of all of the three DEIS Action Alternatives, with additional changes to incorporate capacity created under HB 1110 and HB 1337 (see sidebar).

The Preferred Alternative has capacity for 323,000 jobs, about 185,000 additional capacity for jobs over 2019 jobs and about 60,000 over the capacity in the No Action Alternative. The Wilburton study area accounts for about 20 percent of the additional capacity and about 53 percent of the capacity over the No Action Alternative. The Preferred Alternative has capacity for about 216,000 housing units, about 152,000 additional capacity for housing units over 2019 housing units and about 111,000 over the capacity under the No Action Alternative. About 47 percent of the additional capacity (and about 61 percent of the capacity over the No Action Alternative) is in low-density residential areas, primarily due to the additional capacity created under HB 1110 and HB 1337.

The Preferred Alternative includes additional capacity in Mixed Use Centers that is similar to a mix of Action Alternatives 2 and 3. It would allow for development at heights similar to Action Alternative 3 in the centers of the Mixed Use areas with mid-rise and low-rise development at the edges to transition to the heights of adjacent areas.

See the description of the Wilburton study area below for details on the Preferred Alternative. In BelRed, the future land use is closest to Alternative 3 but with a more gradual stepping down of heights around the 130th Avenue NE Light Rail station area, similar to Alternative 1, and a greater intensity of office use around the 120th/Spring District station area than was studied in the DEIS Action Alternatives.

The Preferred Alternative includes capacity in Neighborhood Centers, similar to Action Alternatives 2 and 3, with some retail-focused Neighborhood Centers accommodating more capacity in the middle of the centers. Most Neighborhood Centers are analyzed with a mix of residential and commercial uses and low-rise buildings, but three centers (Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village Shopping Center) are

Housing Bills

HB 1220 was approved in 2021, amending the Growth Management Act. HB 1220 changed the minimum housing planning requirements for cities and counties subject to the act. The law requires: goals, policies, objectives and mandatory housing provisions for moderate density housing; identify sufficient land capacity for housing at all income levels; make adequate provisions for housing at all economic segments; identify policies and regulations that result in racially disparate impacts, displacement and exclusion and identify policies and regulations that undo racially disparate impacts; and establish anti-displacement policies.

Two new bills were passed during Washington's 2023 legislative session that have a direct impact on capacity for new housing production in zones where single-family homes currently predominate.

HB 1110 requires that cities allow for at least four housing units on every lot that is currently zoned for lower density. It also requires cities to allow for at least six housing units on every lot that is within ¼-mile walking distance of a major transit stop. In Bellevue, this includes light rail stations and bus rapid transit stops. Finally, cities are required to allow for up to six units per lot anywhere if two of the units are affordable, as defined in HB 1110.

Under **HB 1337**, Bellevue must allow at least two accessory dwelling units on all lots that are located in all zoning districts that allow for single-family homes.

analyzed with somewhat more density allowed in low- to mid-rise buildings.

Outside of Mixed Use Centers and Neighborhood Centers, the future land use remains largely the same, similar to Action Alternative 1. However, the specific criteria for increased housing density as outlined in HB 1110 and HB 1337 have been incorporated into the Preferred Alternative, creating far more capacity for housing across the city than was analyzed in Alternative 1.

The HB 1220 affordable housing evaluation in Chapter 7, *Housing*, and Appendix L, *Bellevue Housing Economic Policy Analysis: Phase 1*, of this FEIS addresses the ability of the Preferred Alternative to meet targets at all income bands and the policies or regulations that would be needed to help achieve needed affordability.

The Future Land Use under the Preferred Alternative is shown by quadrant in **Figure 2-4** through **Figure 2-8**.

Land Use Map Key

for Preferred Alternative to be studied in the Final Environmental Impact Statement (FEIS)

This table is the key to the Future Land Use maps. It also shows the relationship between the existing Future Land Use Designations and the proposed Future Land Use Designations. The "existing" column shows the Future Land Use Designations as they are in the current Comprehensive Plan. Each Future Land Use Designation may have one or several zones associated with it. The "EIS" column shows the proposed Future Land Use Designations that will be studied in the Final Environmental Impact Statement. The lines across the "Existing" and "EIS" columns show how the "Existing" land use designations have been combined or split in the "EIS". For example, CB & NB have been combined as MU-L and MF-M has been split between R-Low and R-High.

Existing	EIS	Description
BR-GC	BR-GC	BelRed – General Commercial. A wide variety of business activities in buildings generally 1 or 2 stories.
BR-MO	BR-MO	BelRed – Medical Office. Medical office in buildings generally between 2 & 6 stories.
BR-MO-1		BelRed – Medical Office. Medical office in buildings generally between 4 & 12 stories.
	BR-MO-H-1	BelRed – Medical Office Highrise – 1. Medical office & life sciences with ground floor active uses in highrise towers up to around 15 stories.
	BR-MO-H-2	BelRed – Medical Office Highrise – 2. Medical office & life sciences with ground floor active uses in highrise towers up to around 25 stories.
	BR-MOR-H-1	BelRed – Medical Office/Residential Highrise – 1. Mostly medical office with some housing, retail & services, in highrise towers up to around 15 stories.
	BR-MOR-H-2	BelRed – Medical Office/Residential Highrise – 2. Mostly medical office with some housing, retail & services, in highrise towers up to around 24 stories.
BR-CR	BR-CR	BelRed – Commercial/Residential. Mix of housing, retail, office, & services in buildings generally between 4 & 6 stories.
	BR-MU-M	BelRed – Mixed Use – Midrise. Mix of housing, retail, office, & services in midrise buildings generally up to around 9 stories.
BR-ORT	BR-ORT	BelRed – Office/Residential Transition. Mix of housing & office in buildings generally between 2 & 4 stories such as townhomes & lowrise apartments.
BR-OR	BR-OR	BelRed – Office/Residential. Mostly office with some housing, retail, & services, in buildings generally between 2 & 6 stories.
BR-OR-2	BR-OR-2	BelRed – Office/Residential – 2. Mostly office, with some housing, retail, & services, in buildings generally between 2 & 11 stories.
BR-OR-1	BR-OR-1	BelRed – Office/Residential – 1. Mostly office, with some housing, retail, & services, in buildings generally between 12 & 14 stories.
	BR-OR-H-2	BelRed – Office/Residential – Highrise – 2. Mostly office with some housing, retail, & services, in highrise buildings generally up to around 25 stories.
	BR-O-H-1	BelRed – Office – Highrise -1. Mostly office with some retail, & services, in highrise buildings up to around 15 stories.
BR-R	BR-R	BelRed – Residential. Housing with limited retail & services in buildings generally between 2 & 4 stories.
BR-RC-3		BelRed – Residential/Commercial – 2. Mostly housing, with limited retail, office, & services, in buildings generally between 2 & 5 stories.
BR-RC-2	BR-RC-2	BelRed – Residential/Commercial – 2. Mostly housing, with limited retail, office, & services, in buildings generally between 2 & 11 stories.
BR-RC-1	BR-RC-1	BelRed – Residential/Commercial – 1. Mostly housing, with limited retail, office, & services, in buildings generally between 2 & 14 stories.
	BR-RC-H-1	BelRed – Residential/Commercial Highrise – 1. Mostly housing with limited retail, office, & services in highrise towers generally up to around 16 stories.
	BR-RC-H-2	BelRed – Residential/Commercial Highrise – 2. Residential highrise towers including ground floor active uses up to around 25 stories.
CCC	CCC	Camp & Conference Center. Cabins & congregate buildings on large lots for limited stays.
DT	DT	Downtown. Mix of office, commercial & residential uses in highrise & midrise buildings. Downtown is designed to have higher heights in the center & lower heights on the northern, western & southern edges.
EM-TOD	EM-TOD	East Main – Transit Oriented Development. Midrise to highrise towers up to around 30 stories, consisting mostly of a mix of residential & office uses, with some hotel uses, & ground floor active uses.
GC	GC	General Commercial. Retail, restaurant & office uses mostly in single-story buildings with surface parking.
	INST	Institutional. Classroom, office & dormitories in a campus setting.
LI	LI	Light Industrial. Manufacturing uses in 1 to 3 story buildings.
MI	MI	Medical Institutions. Developed as a campus with taller buildings near the center.
	MO-H-1	Medical Office Highrise – 1. Highrise towers up to around 16 stories, consisting mostly of medical office uses with some hotel, & ground floor active uses.
	MO-H-2	Medical Office Highrise – 2. Highrise towers up to around 25 stories, consisting mostly of medical office uses with some hotel, & ground floor active uses.
	MU-H-1	Mixed Use – Highrise – 1. Highrise towers up to around 16 stories, consisting mostly of a mix of residential & office uses, with some hotel & medical uses, & ground floor active uses
	MU-H-2	Mixed Use – Highrise – 2. Highrise towers up to around 25 stories, consisting mostly of a mix of residential & office uses, with some hotel & medical uses, & ground floor active uses.
	MU-H-3	Mixed Use – Highrise – 3. Highrise towers up to around 45 stories, consisting mostly of a mix of residential & office uses, with some hotel & medical uses, & ground floor active uses.
CB	MU-L	Mixed Use – Lowrise. A mix of residential & commercial use in lowrise buildings between 2 & 4 stories.
NB	MU-L/M	Mixed Use – Low-midrise. A mix of residential & commercial uses in low to midrise buildings between 3 & 6 stories.
NMU	MU-M	Mixed Use – Midrise. Mostly of a mix of residential & office uses, with some hotel & medical uses, & ground floor active uses in midrise buildings up to around 7-10 stories.
EG-TOD		
O	O	Office. Office uses in 1 & 2 story buildings with surface parking.
PO		
OLB		
OLB-2	OLB	Office Limited Business. Office uses in 1 to 4 story buildings mixed with open space.
OLB-OS		
	OR-M	Office/Residential – Midrise. Midrise buildings up to around 7-10 stories, consisting mostly of office uses, with some hotel, residential & medical uses, & ground floor active uses.
	OR-H-1	Office/Residential – Highrise – 1. Highrise towers up to around 16 stories, consisting mostly of office uses, with some hotel, residential & medical uses, & ground floor active uses.
	OR-H-2	Office/Residential – Highrise – 2. Highrise towers up to around 25 stories, consisting of mostly office uses, with some hotel, residential & medical uses, & ground floor active uses.
	OR-H-3	Office/Residential – Highrise – 3. Highrise towers up to around 45 stories, consisting of mostly office uses, with some hotel, residential & medical uses, & ground floor active uses.
SF-L	R-LL	Residential – Large Lot. Mostly single-family homes on large lots with some duplexes & cottage housing types mixed in.
SF-M	R-Suburban	Residential – Suburban. Mix of single-family, duplexes, triplexes, & cottage housing
SF-H		
SF-UR		
MF-L	R-Low	Residential – Low. Mix of single-family, duplexes, triplexes, & small apartment buildings of 4 to 6 units
MF-M		
MF-H	R-Medium	Residential – Medium. Mix of small & large apartment buildings between 2 & 6 stories with some duplexes & townhomes.
	R-High	Residential – High. Mostly larger apartment buildings of 4 to 6 stories.
	RC-M	Residential/Commercial Midrise. Residential midrise buildings including ground floor active uses up to around 7-10 stories.
	RC-H-1	Residential/Commercial Highrise – 1. Residential highrise towers including ground floor active uses up to around 16 stories.
	RC-H-2	Residential/Commercial Highrise – 2. Residential highrise towers including ground floor active uses up to around 25 stories.

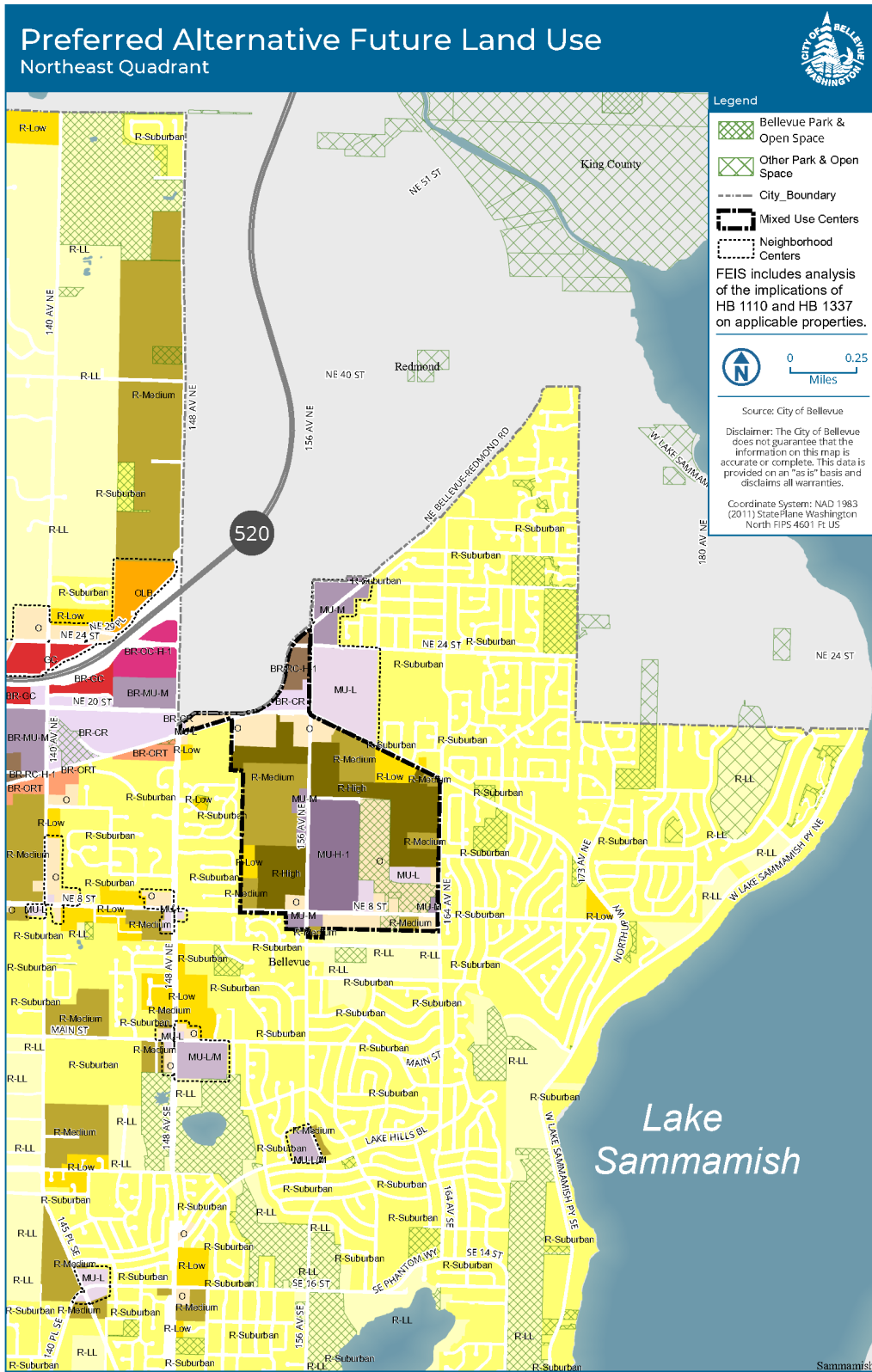
Notes:

- All Parks and other public spaces have a land use category associated with them. On these maps, existing parks are shown in hatched green and the underlying land use is written on it.
- Building floors usually range from 10 to 12 feet: around 12 for commercial development and around 10 for residential development.

SOURCE: City of Bellevue 2023

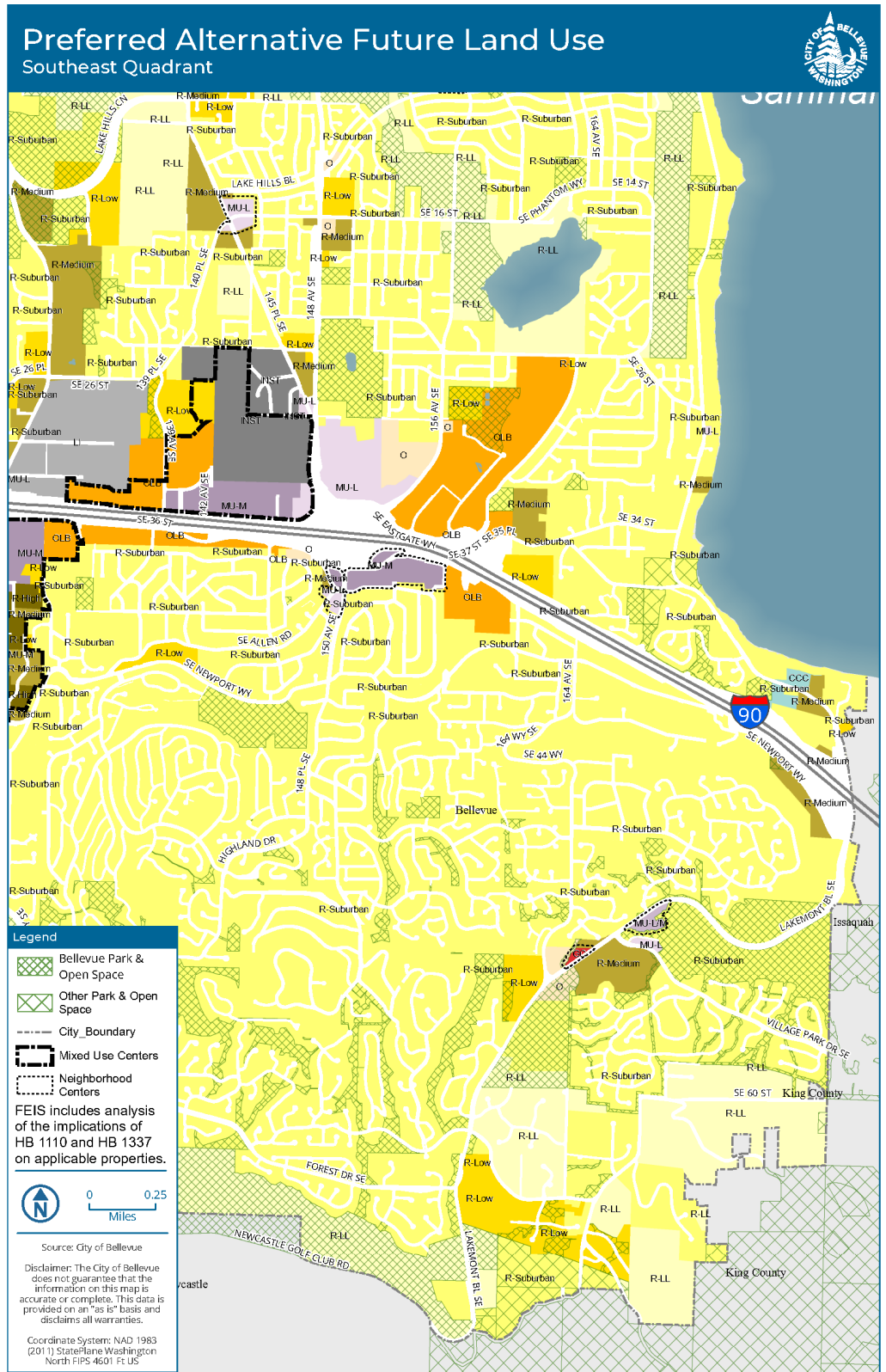
FIGURE 2-4 Preferred Alternative Future Land Use Map: Key

INTENTIONALLY BLANK



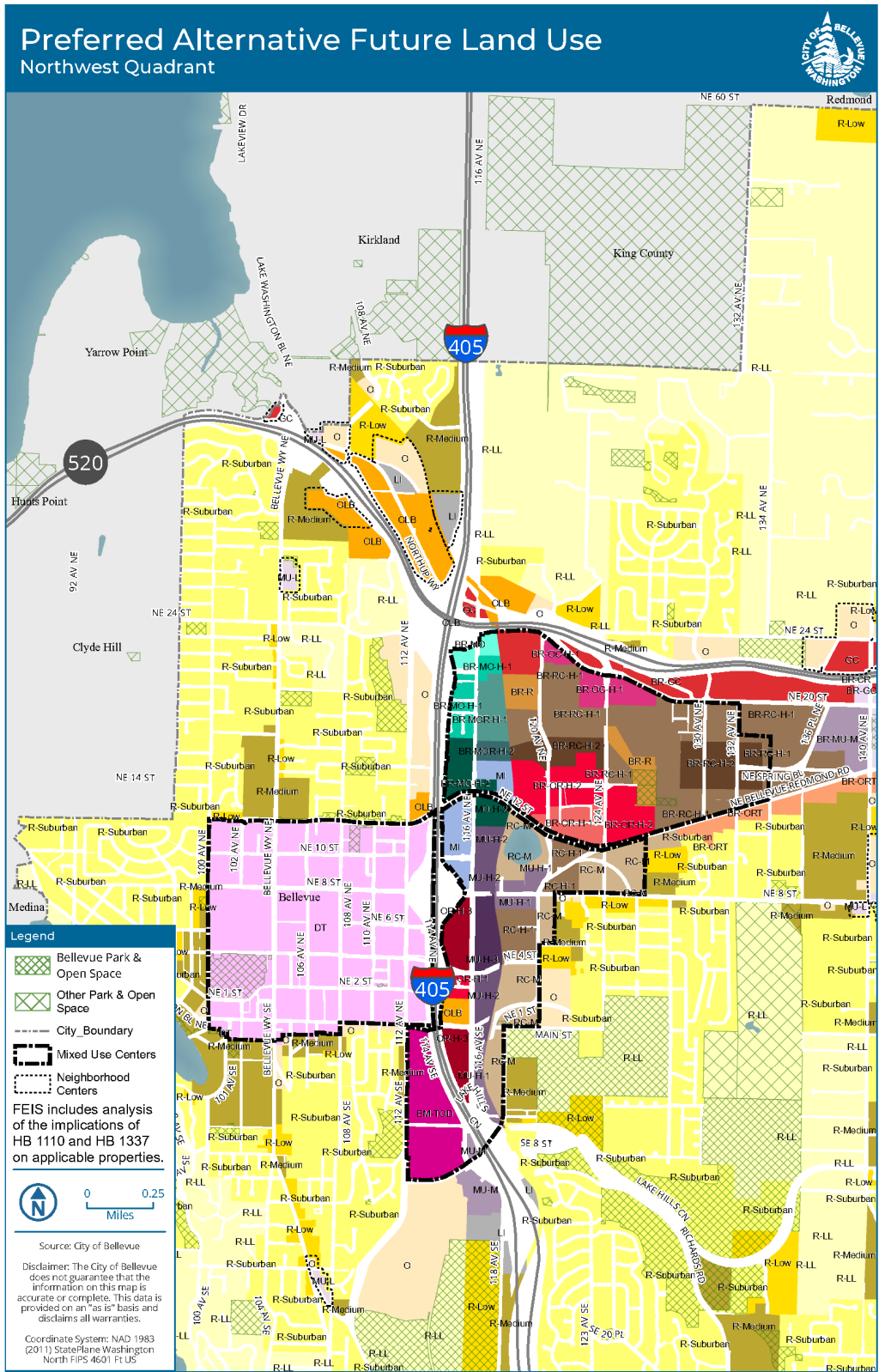
SOURCE: City of Bellevue 2023

FIGURE 2-5 Preferred Alternative Future Land Use Map: Northeast



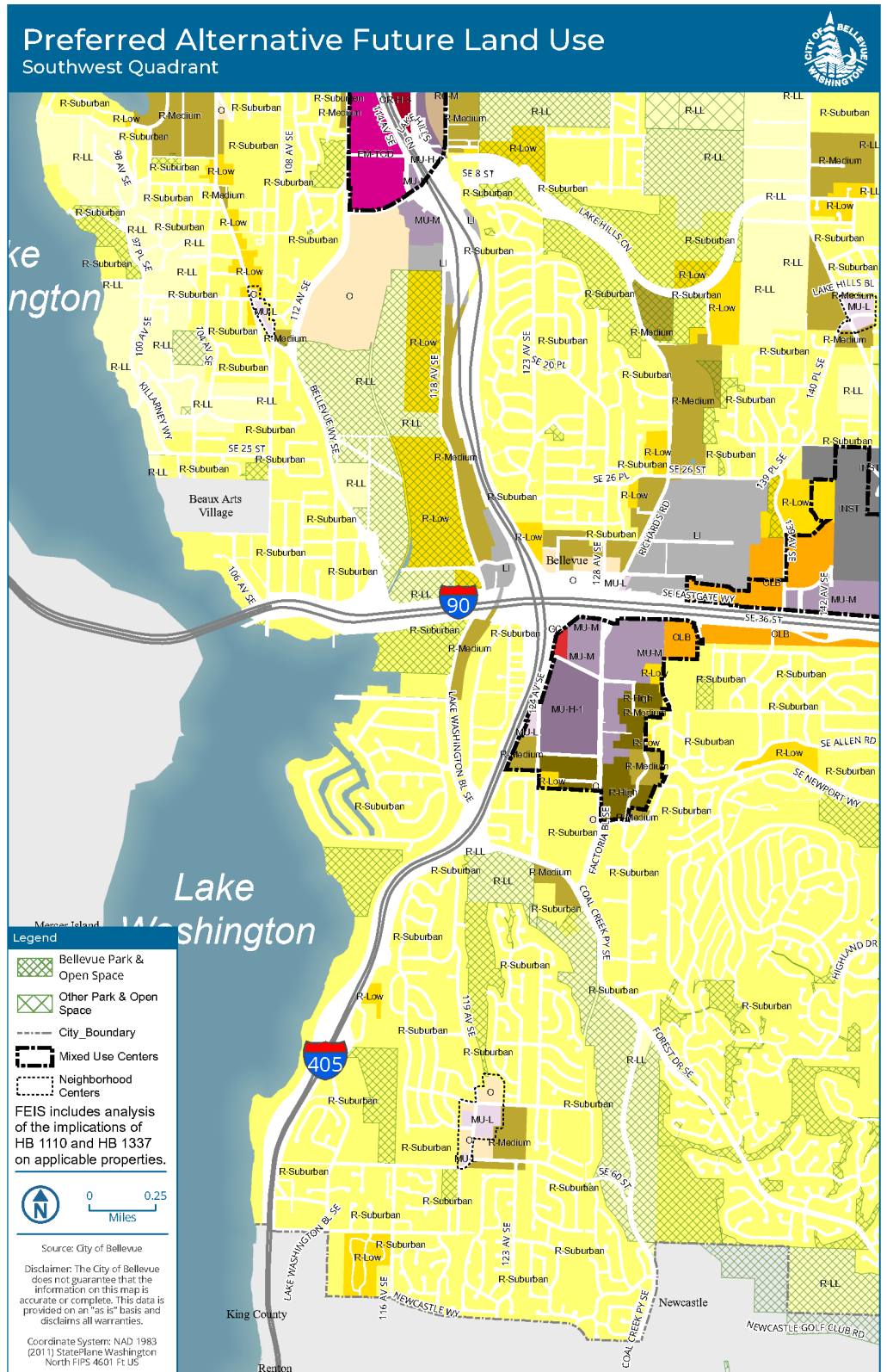
SOURCE: City of Bellevue 2023

FIGURE 2-6 Preferred Alternative Future Land Use Map: Southeast



SOURCE: City of Bellevue 2023

FIGURE 2-7 Preferred Alternative Future Land Use Map: Northwest



SOURCE: City of Bellevue 2023

FIGURE 2-8 Preferred Alternative Future Land Use Map: Southwest

WILBURTON

The Preferred Alternative for the **Wilburton study area** is a hybrid of Wilburton study area Action Alternatives 2 and 3. It allows for slightly greater housing capacity than Action Alternative 3, while focusing most of this additional housing proximate to Eastrail, nearby parks and open spaces, and lower-density residential areas. The highest intensity development potential would be allowed adjacent to I-405 as well as along the Grand Connection between I-405 and Eastrail. Development would transition down in height to lower high-rise and mid-rise scale uses toward the east and southeast study area edges.

The Preferred Alternative would allow for primarily high-rise office uses along the west side of 116th Avenue NE; a mix of high-rise residential, office, and other commercial uses along the east side of 116th Avenue NE and along NE 8th Street; high-rise and mid-rise residential development along 120th Avenue NE; and primarily mid-rise residential development toward the east and southeast edges of the Wilburton study area and around Lake Bellevue. A small area for primarily medical office is located at the corner of 116th Avenue NE and NE 12th Street.

The Preferred Alternative would have capacity for an additional 12.0 million square feet of commercial development in the Wilburton study area and would include an additional 14,800 housing units and space for an additional 35,500 jobs.

See **Table 2-3** for a map and description.

2.3 Comparison of Alternatives

Table 2-4 compares housing and jobs across all alternatives and major geographic areas under evaluation. Alternative 0 has the least growth capacity for housing and jobs and the Preferred Alternative the most for housing, primarily because of added housing capacity in the single-family housing areas. Alternative 3 has the most capacity for jobs. The Preferred Alternative is similar to the new jobs considered under Alternative 1.

In the Wilburton study area, the Preferred Alternative has slightly more housing than Alternative 3, and its jobs are in the range of the other alternatives. See **Table 2-5**.

TABLE 2-3 Preferred Alternative – Wilburton Study Area

Growth Level and Pattern	Transportation and Building Form
<ul style="list-style-type: none"> Capacity for an additional 14,800 housing units (14,600 above No Action) Capacity for an additional 35,500 jobs (31,500 above No Action) Capacity for an additional 12.0 million square feet of commercial development (10.7 million above No Action) <p>FOCUS OF GROWTH: Greatest growth in the core of the Wilburton study area along the Grand Connection alignment between I-405 and Eastrail, as well as along 116th Avenue NE; transitioning to lower high-rise and mid-rise scale buildings toward the east and southeast.</p>	<p>TRANSPORTATION:</p> <ul style="list-style-type: none"> Studies NE 6th Street arterial extension from I-405 to both 116th Avenue NE and 120th Avenue NE, with an at-grade intersection at 116th Avenue NE. New local access and active transportation facilities support greater walkability, livability, and connectivity to Eastrail, as depicted in Figure 11-5 of Chapter 11. <p>LAND USE MIX:</p> <ul style="list-style-type: none"> Primarily office uses along the west side of 116th Avenue NE. Mix of residential, office, and other commercial uses along the east side of 116th Avenue NE and along NE 8th Street. Primarily residential uses east of Eastrail, including around Lake Bellevue. Primarily medical office uses at the corner of 116th Avenue NE and NE 12th Street. <p>DEVELOPMENT INTENSITY:</p> <ul style="list-style-type: none"> Building heights up to around 45 stories in a core area between I-405, NE 8th Street, NE 4th Street, and Eastrail; as well as adjacent to -405 and East Main. Building heights up to around 25 stories along the east side of 116th Avenue NE outside the core. Building heights up to around 16 stories along NE 8th Street and 120th Avenue NE east of Eastrail and north of NE 4th Street. Building heights up to around 10 stories toward the east and southeast study area edges, as well as around Lake Bellevue. <p>HOUSING TYPOLOGIES AND LOCATIONS:</p> <ul style="list-style-type: none"> Residential uses throughout the study area, ranging from up to around 45 stories along 116th Avenue NE to up to around 10 stories toward the east and southeast edges of the study area. Residential mid-rise buildings up to around 10 stories around Lake Bellevue.

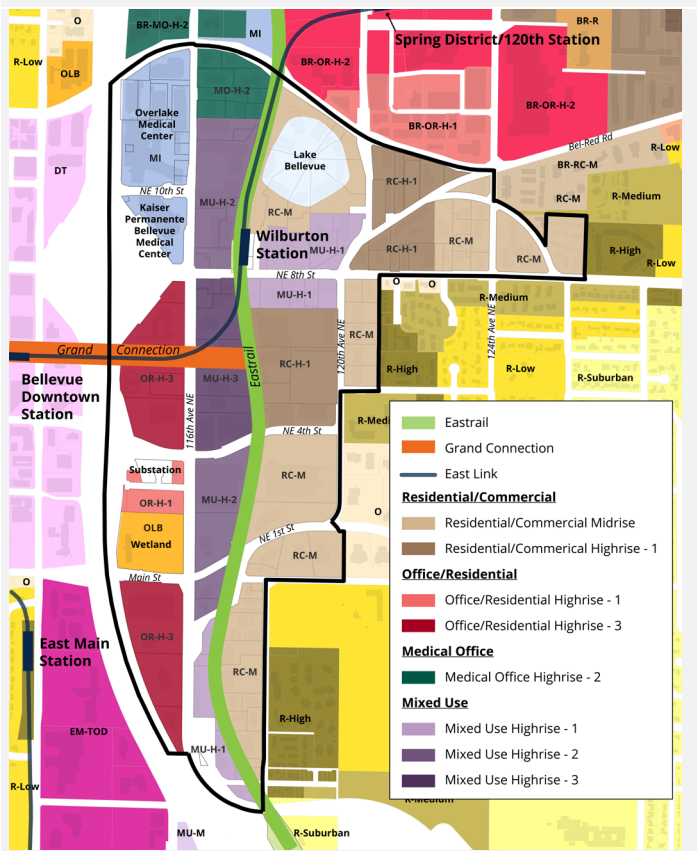


TABLE 2-4 Distribution of Net Housing and Job Capacity by Alternative, Citywide

Location	Alternative 0 (No Action)		Alternative 1		Alternative 2		Alternative 3		Preferred Alternative	
	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs
Citywide	41,000	124,000	59,000	179,000	77,000	177,000	95,000	200,000	152,000	185,000
Mixed Use Centers	31,500	119,500	45,900	171,200	52,600	168,500	60,900	184,500	64,600	168,900
Neighborhood Centers	100	2,900	100	2,800	1,600	3,800	1,700	3,800	3,100	2,900
Transit Proximate Areas	17,900	85,300	26,300	123,100	34,100	124,000	36,800	133,000	42,400	113,500
Low Density Residential	3,700	(200)	4,500	(200)	7,100	(200)	14,600	(200)	72,200	(200)

SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Growth estimates are rounded to the nearest 1,000 citywide and 100 for geographic subareas. The actual pace of growth could differ or be less than what is shown.

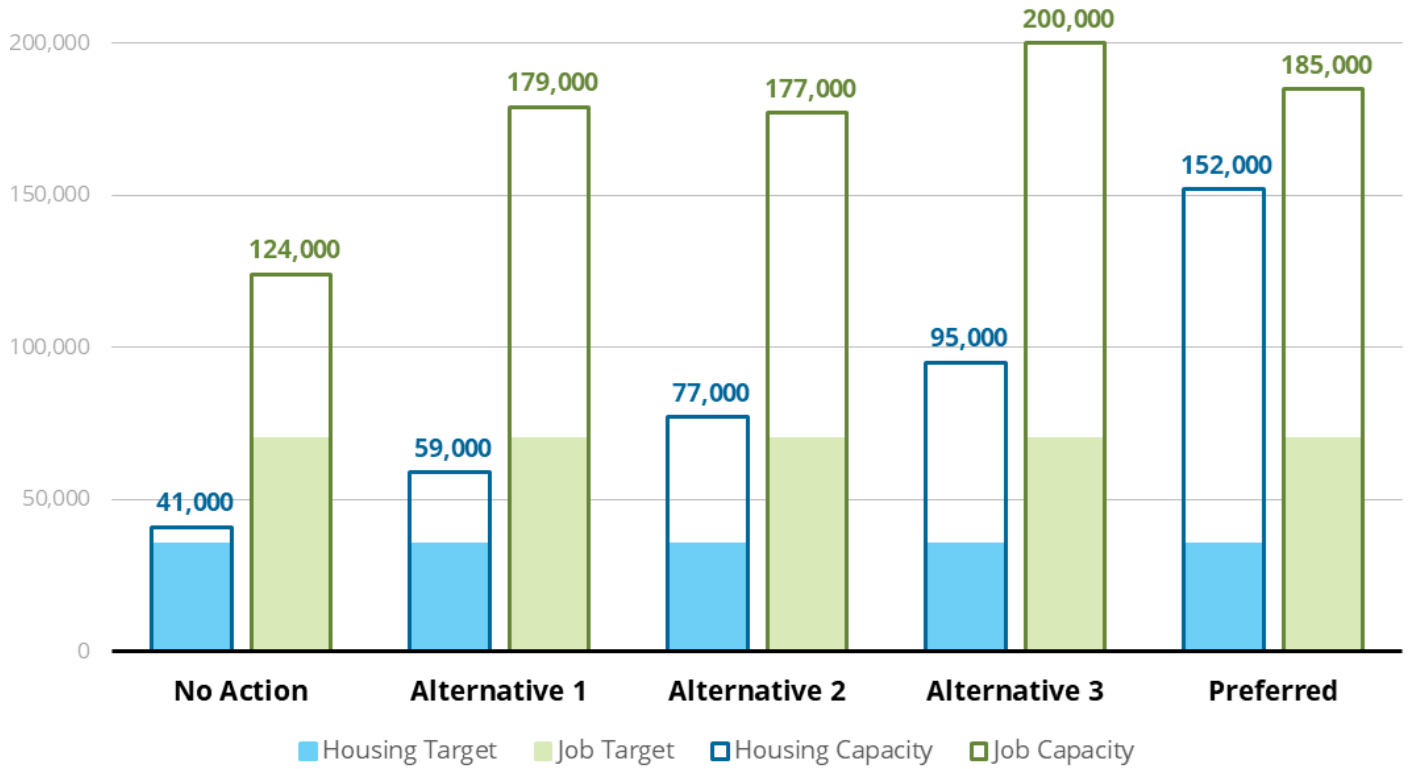
TABLE 2-5 Distribution of Net Housing and Job Capacity by Alternative, Wilburton Study Area

Alternative 0 (No Action)		Alternative 1		Alternative 2		Alternative 3		Preferred Alternative	
Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs
300	3,900	9,200	44,800	14,200	38,100	14,300	44,500	14,800	35,500

SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Growth estimates are rounded to the nearest 100. The actual pace of growth could differ or be less than what is shown.

Figure 2-9 compares citywide capacity for new housing and jobs under each alternative to the adopted targets, and **Table 2-6** summarizes features of the alternatives studied in this EIS.



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Growth estimates are rounded to the nearest 1,000. The actual pace of growth could differ or be less than what is shown. Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County's 2021 Urban Growth Capacity Report.

FIGURE 2-9 Net Housing and Job Capacity Citywide vs. Adopted Targets (2019-2044), All Alternatives

TABLE 2-6 Comparison of Citywide Alternative Features

Feature	Alternative 0 (No Action)	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Theme	Current plan	Focus growth in centers with gentle growth across the city	Focus growth in centers and in areas with good access to jobs and transportation with gentle density across the city	Focus growth in and around Mixed Use and Neighborhood Centers and in areas of high opportunity with gentle density across the city	Includes additional capacity in Mixed Use Centers that is similar to a mix of Action Alternatives 2 and 3
Growth Pattern	Downtown, BelRed, and East Main	Centers: Downtown, BelRed, Wilburton/ East Main, Eastgate, Factoria, Crossroads Other: Gentle density throughout	Mixed Use Centers, Neighborhood Centers, and areas with good access to transit/jobs Other: Gentle density throughout	Mixed Use Centers, in and around Neighborhood Centers, areas with good access to transit/jobs and in areas of high opportunity (close to major employment centers)	Similar to Alternative 3 in centers and near transit, with more extensive middle housing and accessory dwellings (gentle density) in single-family areas
Housing Types	Residential buildings with studios, 1-bed	Residential buildings in Mixed Use Centers with units ranging from 0 to 2 or 3 bedrooms Duplexes, townhomes, and similar types across city	Residential buildings with studios, 1-bed in Mixed Use and Neighborhood Centers Duplexes to small residential buildings in areas with access to transit/jobs Duplexes on larger lots	Residential buildings with studios, 1-bed in Mixed Use Centers Duplexes to small residential buildings in areas of high opportunity and near Neighborhood Centers Duplexes on larger lots Additional density allowed in existing lowest density areas	Similar to Alternatives 1–3 with new housing types including new middle housing Duplexes, triplexes, and townhomes in low residential areas

Feature	Alternative 0 (No Action)	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Housing Affordability	Less than 10%	Mandatory inclusionary affordability in growth corridor Increased incentives elsewhere	Tiered incentives in Mixed Use and Neighborhood Centers Increased incentives across city	Mandatory inclusionary affordability in Mixed Use Centers Increased incentives across the city	Housing affordability analyzed in Chapter 7, <i>Housing</i> , and in housing appendices (Appendix L, <i>Bellevue Housing Economic Policy Analysis: Phase 1</i> , Appendix Q, <i>Bellevue Emergency Housing Land Capacity Analysis</i> , and Appendix R, <i>Bellevue Affordable Housing Capacity Analysis, Technical Report</i>).
Transportation Investments	Current	NE 6th St extended between I-405 and 116th Ave NE. New multimodal connections that create smaller, more walkable blocks throughout the Wilburton study area, as depicted in Figure 11-5 in Chapter 11.	Same as Alternative 1	Same as Alternative 1, but also includes NE 6th St extended between I-405 and 120th Ave NE	Same as Alternative 3
Plan Policies	Current	Updated	Updated	Updated	Updated
Code	Current	Updated	Updated	Updated	Updated



CHAPTER 3 Land Use Patterns and Urban Form

3.1 Updates to the DEIS

There are no major updates to the DEIS analysis related to land use patterns and urban form. See Chapter 15 for clarifications and corrections.

3.2 Impacts

Impact categories used to identify potential adverse land use impacts of the Preferred Alternative are the same as those used in DEIS Chapter 3, *Land Use Patterns and Urban Form*—capacity to accommodate growth targets, land use compatibility, displacement risk, and access to community assets. The Preferred Alternative is expected to result in a land use impact if:

- **Growth targets:** The action would result in insufficient capacity to accommodate adopted citywide growth targets, including requirements to accommodate affordable housing across income bands and a range of housing types. Growth targets are established citywide and so considered only as a citywide threshold.
- **Land use compatibility:** The action would result in a change to land use patterns or development intensities that preclude reasonable transitions between zones with less and more intensive impacts in terms of noise, air quality, light/glare, and shade/shadow.
- **Displacement:** The land use pattern would result in involuntary residential or commercial displacement as a result of redevelopment.¹

¹ The displacement risk threshold in this chapter considers the potential for involuntary residential displacement based on the overall capacity for growth and land use patterns in the city. The residential displacement risk impact threshold in Chapter 7, *Housing*, considers growth in relation to areas identified by the city at high risk at displacement.

- **Access to community assets:** The action would discourage or reduce diverse uses within ¼ mile of major transit stops or would result in a land use pattern that limits convenient access to community gathering spaces for households or employees.

Like DEIS Chapter 3, land use impacts of the Preferred Alternative are considered significant if there is an acute/severe adverse impact within one of the impact categories defined below, or if there are cumulative land use impacts in multiple categories within the Mixed Use Centers, Neighborhood Centers, transit-proximate areas, or Wilburton study area. Transit-proximate areas are based on the 2021 bus rapid transit (BRT) network and do not include future bus or light rail.

Table 3-1 and **Table 3-2** summarize and compare adverse land use impacts citywide and in the Wilburton study area under each of the alternatives.

TABLE 3-1 Summary of Land Use Impacts by Alternative, Citywide

Impact Threshold	No Action	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
Growth Targets	▽	None	None	None	None
Land Use Compatibility	▽	▽	▽	▼	▼
Residential Displacement*	▼	▽	▽	▽	▽
Commercial Displacement	▽	▽	▼	▼	▼
Access to Community Assets	None	△	△	▲	△**

SOURCE: BERK 2023

NOTES: Land use impacts are considered either adverse (▼), moderately adverse (▽), moderately positive (△), or positive (▲).

* The displacement risk threshold in this chapter considers the potential for involuntary residential displacement based on the overall capacity for growth and land use patterns in the city. The residential displacement risk impact threshold in Chapter 7, *Housing* considers growth in relation to areas identified by the City at high risk at displacement.

** Positive impacts to access to community assets are lower citywide under the Preferred Alternative than Alternative 3 because more housing is focused in low-density areas. See Access to Community Assets below.

TABLE 3-2 Summary of Land Use Impacts by Alternative, Wilburton Study Area

Impact Threshold	No Action	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
Land Use Compatibility	▽	▼	▼	▼	▼
Residential Displacement*	▽	▽	▽	▽	▽
Commercial Displacement	▽	▼	▼	▼	▼
Access to Community Assets	None	▲	▲	▲	▲

SOURCE: BERK 2023

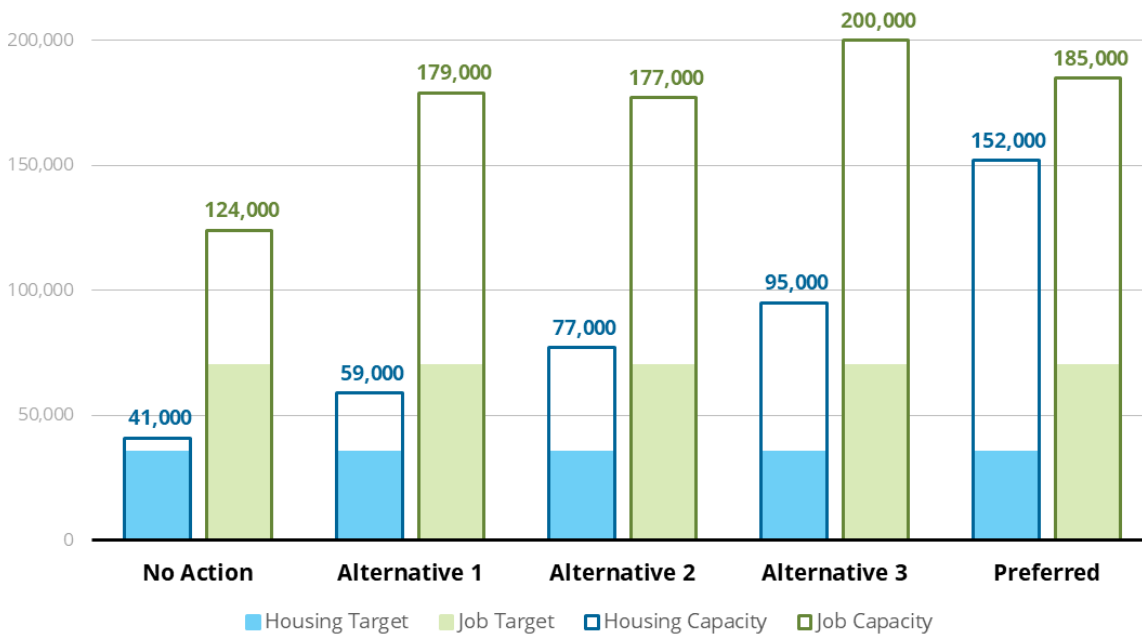
NOTES: Land use impacts are considered either adverse (▼), moderately adverse (▽), moderately positive (△), or positive (▲). Growth targets are not considered in this chart as they are a citywide threshold.

* The displacement risk threshold in this chapter considers the potential for involuntary residential displacement based on the overall capacity for growth and land use patterns in the city. The residential displacement risk impact threshold in Chapter 7, *Housing* considers growth in relation to areas identified by the City at high risk at displacement.

3.2.1 Comparison of Preferred Alternative and No Action Alternative

GROWTH TARGETS

King County’s adopted Countywide Planning Policies (CPPs) establish a housing target of 35,000 units and job target of 70,000 by 2044 for Bellevue.² **Figure 3-1** summarizes the distribution of capacity for housing and job growth citywide under all alternatives compared to the adopted targets.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Capacity estimates are rounded to the nearest 1,000. The actual pace of growth could differ or be less than what is shown. Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County’s 2021 Urban Growth Capacity Report. See DEIS Chapter 2, *Alternatives*, and DEIS Chapter 4, *Relationship to Plans and Policies*, for a discussion of why these numbers are different.

FIGURE 3-1 Net Capacity for Growth Citywide vs. Adopted Targets (2019–2044), All Alternatives

Citywide, the housing and job capacities analyzed under each alternative are higher than the adopted targets, with the Wilburton study area accounting for 10 percent of citywide housing capacity and 19 percent of citywide job capacity under the Preferred

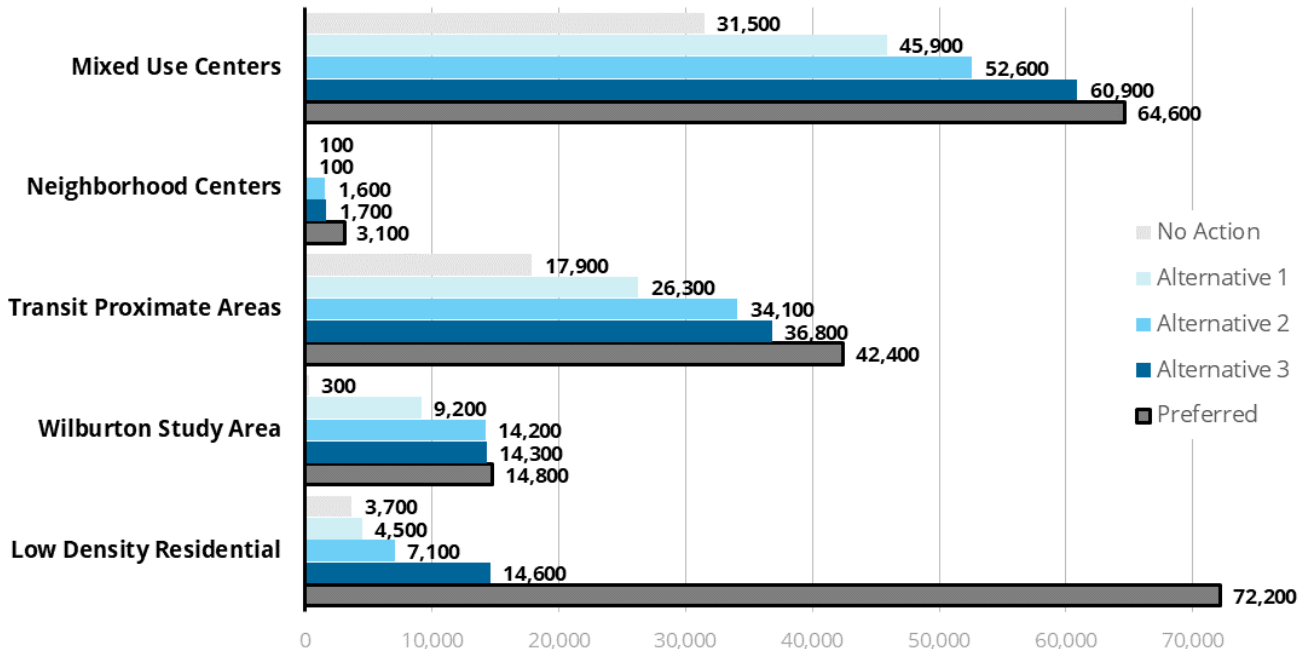
² Growth targets were adopted in 2019. Growth targets are based on actual growth projections prepared by the state, whereas development capacity is based on assumptions about how much land is redevelopable and the type of projects that could be developed under existing zoning. Net capacity for growth under each of the alternatives is relative to 2019 housing and jobs. Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County’s 2021 Urban Growth Capacity Report. See DEIS Chapter 2, *Alternatives*, and Chapter 4, *Relationship to Plans and Policies*, for a discussion of why these numbers are different.

Alternative. The No Action Alternative does not meet other new planning requirements for affordable housing across income bands or a range of housing types, and so **an adverse growth target impact is expected under the No Action Alternative. The Preferred Alternative, like the other Action Alternatives, would provide adequate capacity citywide, meet affordability requirements across all income bands, and provide a range of housing types, so no adverse land use impacts related to the citywide growth targets are expected.**

LAND USE COMPATIBILITY

Figure 3-2 and **Figure 3-3** summarize capacity for new housing and job growth under each alternative by specific location (Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and the Wilburton study area). Housing capacity within each of the specific locations is generally lowest under the No Action Alternative and highest under the Preferred Alternative—in particular, new housing capacity in the low-density residential areas under the Preferred Alternative is significantly higher than any of the other alternatives (see the discussion below). Like the other alternatives, job capacity within each of the specific locations under the Preferred Alternative is higher than the No Action Alternative. Note that the Mixed Use and Neighborhood Centers are mutually exclusive geographic areas, while the transit-proximate areas and Wilburton study area overlap with the boundaries of the Mixed Use and Neighborhood Centers.

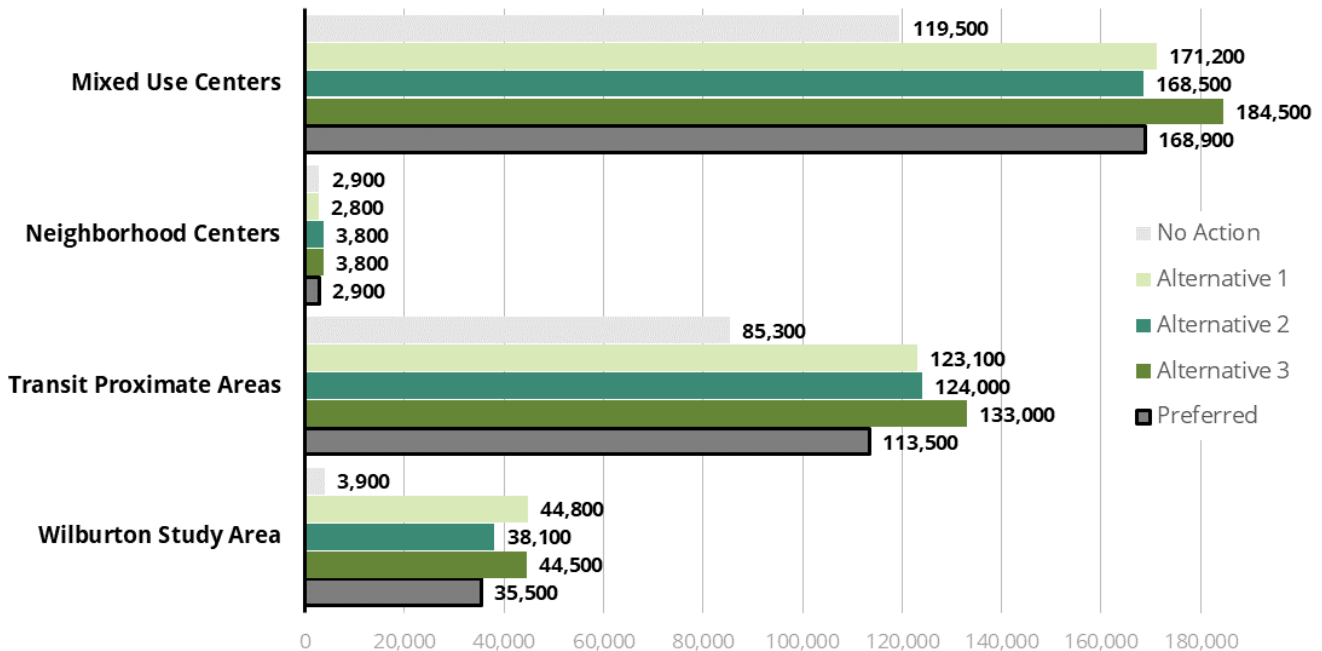
Table 3-3 and **Table 3-4** compare percent share of citywide existing housing and jobs plus capacity by location under each alternative. The alternative with the highest percent share of housing or jobs is bolded for each location. The Preferred Alternative shifts a lower share of housing to the Mixed Use Centers than the No Action Alternative (with a corresponding increase in the proportion of housing in low-density residential areas under the Preferred Alternative). Jobs would continue to be focused in the Mixed Use Centers under the No Action and Preferred Alternative, accounting for approximately 82 percent of jobs citywide under the No Action and Preferred Alternative. Within the Mixed Use Centers, Downtown would continue to account for the greatest share of housing and jobs under any alternative, although a greater share of housing and job capacity would be shifted to other Mixed Use Centers under the Preferred Alternative.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Capacity estimates are rounded to the nearest 100. The actual pace of growth could differ or be less than what is shown. The Mixed Use and Neighborhood Centers are mutually exclusive geographic areas, while the transit-proximate areas and Wilburton study area overlap with the boundaries of the Mixed Use and Neighborhood Centers. The Wilburton study area is part of the Wilburton-East Main Mixed Use Center.

FIGURE 3-2 Net Housing Capacity by Location (2019–2044), All Alternatives



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Capacity estimates are rounded to the nearest 100. The actual pace of growth could differ or be less than what is shown. The Mixed Use and Neighborhood Centers are mutually exclusive geographic areas, while the transit-proximate areas and Wilburton study area overlap with the boundaries of the Mixed Use and Neighborhood Centers. The Wilburton study area is part of the Wilburton-East Main Mixed Use Center.

FIGURE 3-3 Net Job Capacity by Location (2019–2044), All Alternatives

TABLE 3-3 Percent Share of Citywide Total Housing and Jobs by Location (Existing + Capacity), All Alternatives

Location	Housing						Jobs					
	Existing	Alt. 0	Alt. 1	Alt. 2	Alt. 3	Pref.	Existing	Alt. 0	Alt. 1	Alt. 2	Alt. 3	Pref.
Mixed Use Centers	27.7%	46.9%	51.7%	49.9%	49.4%	38.1%	68.8%	81.9%	84.0%	83.7%	82.7%	81.7%
Neighborhood Centers	0.3%	0.3%	0.2%	1.3%	1.2%	1.5%	6.2%	4.4%	3.6%	3.9%	3.7%	3.6%
Transit-Proximate Areas	29.7%	35.1%	36.8%	37.7%	35.1%	28.4%	61.2%	64.8%	65.5%	66.2%	64.3%	61.3%
Wilburton Study Area	0.6%	0.7%	7.8%	10.4%	9.2%	7.0%	6.8%	5.1%	17.1%	15.1%	15.9%	13.9%
Low-Density Residential	48.4%	33.0%	28.9%	27.0%	28.7%	47.8%	4.8%	2.4%	2.0%	2.0%	1.9%	2.0%

SOURCES: City of Bellevue 2023; BERK 2023

NOTES: The alternative with the highest percent share of housing or jobs is **bolded** for each location. Values do not sum to 100% by alternative as not all geographies are mutually exclusive.

TABLE 3-4 Percent Share of Mixed Use Center Total Housing and Jobs by Center (Existing + Capacity), All Alternatives

Location	Housing						Jobs					
	Existing	Alt. 0	Alt. 1	Alt. 2	Alt. 3	Pref.	Existing	Alt. 0	Alt. 1	Alt. 2	Alt. 3	Pref.
Downtown	56.5%	58.1%	48.7%	44.1%	39.9%	35.7%	63.1%	69.3%	52.6%	53.2%	50.7%	45.0%
BelRed	3.4%	19.3%	16.8%	15.2%	22.3%	21.0%	5.7%	10.5%	13.2%	15.4%	14.6%	15.7%
Eastgate	1.1%	1.0%	0.9%	1.1%	1.0%	1.2%	6.4%	3.2%	2.7%	2.8%	2.6%	2.8%
Factoria	6.8%	3.5%	3.9%	4.6%	5.1%	6.6%	8.9%	3.7%	4.2%	3.7%	5.8%	7.5%
Wilburton-East Main	2.3%	4.9%	17.8%	23.2%	20.9%	21.1%	12.2%	10.8%	24.1%	21.8%	22.9%	21.9%
Crossroads	29.9%	13.0%	11.5%	11.8%	10.7%	14.2%	3.8%	2.5%	3.2%	3.2%	3.4%	7.1%

SOURCES: City of Bellevue 2023; BERK 2023

NOTES: The alternative with the highest percent share of housing or jobs is **bolded** for each location. Values do not sum to 100% by alternative as not all geographies are mutually exclusive.

Future growth under the No Action Alternative or Preferred Alternative is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the Mixed Use Centers and, to a varying extent, in other areas of the city. As redevelopment occurs, there is potential for localized land use compatibility impacts to occur under either alternative where newer development is of greater height and intensity than existing development. **Citywide, adverse land use compatibility impacts are expected under both alternatives.**

In the **Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and Wilburton study area**, capacity for new housing and jobs under the Preferred Alternative would be higher

than the No Action Alternative (capacity for new housing would be slightly higher than Alternative 3, and capacity for new jobs would be similar to or slightly lower than Alternative 2). Land use compatibility impacts in these four geographies under the Preferred Alternative would be similar to those described under DEIS Section 3.3.5, *Impacts of Alternative 2*, and DEIS Section 3.3.6, *Impacts of Alternative 3*.

Capacity for new housing in **low-density residential areas** would be significantly higher under the Preferred Alternative than any of the other studied alternatives (including the No Action Alternative) as a result of additional changes to incorporate capacity created to comply with HB 1110 and HB 1337. Areas currently zoned for low-density residential (R-1 through R-7.5) would have capacity for approximately 72,200 new housing units under the Preferred Alternative, compared to 3,700 under the No Action Alternative and between 4,500 and 14,600 under the other Action Alternatives. This represents approximately 48 percent of new housing capacity citywide versus 9 percent under the No Action Alternative and is greater than the capacity for new housing in Mixed Use Centers under any of the other alternatives (see Figure 3-2). Approximately 48 percent of citywide existing housing plus new housing capacity would be in the low-density residential areas (versus 33 percent under the No Action Alternative), which is consistent with the existing share of housing in these areas (see Table 3-3). This would likely result in more and denser development in the low-density residential areas than any of the other alternatives. All new development in the low density residential areas (including new middle housing) would still be subject to the height, set-back, and other form requirements for single-unit development. Increased capacity under the Preferred Alternative could result in more development that differs from abutting properties in terms of the number of units, which could increase activity levels and intensity resulting in an adverse land use compatibility impact but would be similar in scale to other new and existing single-unit development in these areas. Land use compatibility impacts in the low-density residential areas, if they occur, are likely temporary and would resolve over time as development occurs.

HB 1110 also places restrictions on off-street parking requirements for middle housing. Per HB 1110, off-street parking cannot be required as a condition of permitting middle housing development within a ½-mile walking distance of a major transit stop.³ Most new residential development in Bellevue, including middle housing, must currently meet a minimum parking requirement above zero (outside

Definition of Middle Housing

Middle housing is a term for homes that are at a middle scale between detached single-family houses and large multi-family complexes. Examples include duplexes, triplexes, fourplexes, fiveplexes, sixplexes, courtyard apartments, cottage clusters, and townhomes.

Major Transit Stops

Per HB 1110, **major transit stops** are stops on high-capacity transit systems, commuter rail stops, stops on rail or fixed guideway systems, or stops on bus rapid transit routes.

³ [ESSB HB 1110](#) (Section 3.6.d) 2023.

of certain Downtown zones and some senior housing projects). Existing parking minimums for residential uses per the Land Use Code are listed in **Table 3-5**.

TABLE 3-5 Existing Minimum and Maximum Parking Requirement by Zone

Location/Zones	Minimum	Maximum
DOWNTOWN^a		
DT-O-1, -O-2	0.0	2.0
DT-R, -MU, -OB, -OLB	1.0	2.0
BELRED^b		
BR-OR-1, -OR-2, -RC-1, -RC-2, or -RC-3	0.8	2.0
BR-OR, -RC, -CR, -R, or -ORT	1.0	2.0
ALL OTHER ZONING DISTRICTS (IF RESIDENTIAL IS ALLOWED)^c		
Single-family detached	2.0	<i>No max</i>
Multiple-unit structure	One-bedroom or studio unit	1.2
	Two-bedroom unit	1.6
	Three- or more bedroom unit	1.8
Near frequent transit service ^d	Affordable housing w/frequent transit service (service at least 2 times/hour)	0.75
	Affordable housing (service at least 4 times/hour)	0.5
	Market rate multifamily dwelling	0.75
	Senior housing	0.0

SOURCES: [Land Use Code](#) 2023; BERK 2023

NOTES:

- a. Per [BMC 20.25A.080.B](#). Two or more dwelling unit structures are permitted in all Downtown zones per [BMC 20.25A.050.D](#). [BMC 20.20.590.F](#) The alternative with the highest percent share of housing or jobs is bolded for each location. Values do not sum to 100% by alternative as not all geographies are mutually exclusive.
- b. Per [BMC 20.25D.120.B](#). Housing in BelRed zones is allowed as follows ([BMC 20.25D.070](#)): BR-MO and MO-1 do not allow residential uses; BR-GC only permits work-live units; BR-OR, OR-1, OR-2, and R permit single family (minimum density of 10 units/acre) and two or more dwelling unit structures; BR-RC-1, RC-2, and RC-3 permit two or more dwelling unit structures; BR-CR permits single family and two or more dwelling unit structures with a minimum density of 10 units/acre; and BR-ORT permits single family and two or more dwelling unit structures.
- c. Per [BMC 20.20.590.F](#).
- d. Per [BMC 20.20.590.L](#).

Under the Preferred Alternative, new middle housing development within a ½-mile walking distance of a major transit stop would no longer require off-street parking, consistent with new state requirements. This could result in increased land use compatibility impacts with existing development—including within most of the Mixed Use Centers, the Wilburton study area, three Neighborhood Centers (the 8th and 140th, 8th and 148th, and the Bellevue Technology Center [BTC] Area in northeast Bellevue), and low-density residential areas. Impacts would be more pronounced where existing parking minimums are higher (e.g., zones currently intended for single-family detached housing within the low-density residential areas). Under the Preferred Alternative, about 1,200 acres of 3,100 acres within a ½-mile walking distance of major transit stops would

be zoned R-1 through R-5 (or 39 percent)—these areas generally surround the central portion of the NE 8th Street corridor between the Wilburton East Main and Crossroads Mixed Use Centers, west of Crossroads surrounding 148th Ave NE, and north of the Bellevue Way SE and I-90 interchange.

Outside of the ½-mile walking distance of a major transit stop, lots smaller than 6,000 square feet cannot require more than one off-street parking space, and those greater than 6,000 square feet cannot require more than two off-street parking space for middle housing per HB 1110.⁴ About 95 percent of lots outside of the ½-mile walking distance are greater than 6,000 square feet so could not require more than two off-street parking spaces where middle housing would be allowed—no parking minimums for residential uses in Bellevue are above two spaces per unit (and most minimums are less than two) so compatibility impacts related to parking requirements would be similar to the No Action Alternative in these areas.

The remaining 5 percent of lots outside of the ½-mile walking distance are less than 6,000 square feet and sprinkled throughout. About 77 percent of these are in low-density residential areas (R-1 to R-7.5), 18 percent in medium to high-density residential areas (R-10 and above), and the remainder in other zones (not all of which necessarily allow residential development). Like above, adverse land use compatibility impacts related to parking would be most pronounced in the low-density residential areas but could occur in other areas (such as Factoria and Eastgate and nearly all of the Neighborhood Centers, which are more than a ½-mile walking distance of a major transit stop). However, these impacts would be scattered consistent with the spread of smaller lots and would be limited to new middle housing development. **The reduced use of land for parking could also increase the use of land for housing, landscaping, or other amenities and could result in an overall neutral or beneficial effect in terms of community design.**

⁴ Lot size is before any zero lot line subdivisions or lot splits. [ESSB HB 1110](#) (Section 3.6.e-f), 2023.

Wilburton Study Area

The Preferred Alternative would add significant capacity in the **Wilburton study area** compared to the No Action Alternative, with an estimated capacity for an additional 14,800 housing units, 35,500 jobs, and 12.0 million square feet of commercial development. This is approximately 14,600 housing units, 31,500 jobs, and 10.7 million square feet of commercial development above the No Action Alternative. Capacity for new housing units is just above Alternative 3 and capacity for new jobs is slightly below Alternative 2. Like Alternatives 2 and 3, the densest growth and greatest building heights in the Wilburton study area would be focused in the core along the Grand Connection alignment between I-405 and Eastrail, as well as along 116th Avenue, under the Preferred Alternative.

Adverse land use compatibility impacts in the Wilburton study area are expected under both alternatives and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*.

DISPLACEMENT

All alternatives provide capacity for housing, population, and employment growth and include some amount of new development or redevelopment. Limited redevelopment under the No Action Alternative could push land costs and rents higher than the Preferred Alternative, resulting in more potential for displacement as a result of rising costs. In contrast, potential displacement as a result of redevelopment could occur under the No Action and Preferred Alternative but may be lower in the No Action Alternative as a result of lower overall capacity for growth. However, capacity numbers are presented as net increases above existing; the presumption is that current housing and commercial space can be replaced and there could be additional housing and jobs above existing levels. Figure 3-2 and Figure 3-3 summarize capacity for new housing and job growth by specific location under each alternative. **Table 3-6** and **Figure 3-4** summarize capacity for growth in commercial square footage citywide and by specific location. Capacity for all types of growth within each of the specific locations is generally lower under the No Action Alternative than the Preferred Alternative.

TABLE 3-6 Net Capacity for Growth in Commercial Square Footage by Location, All Alternatives

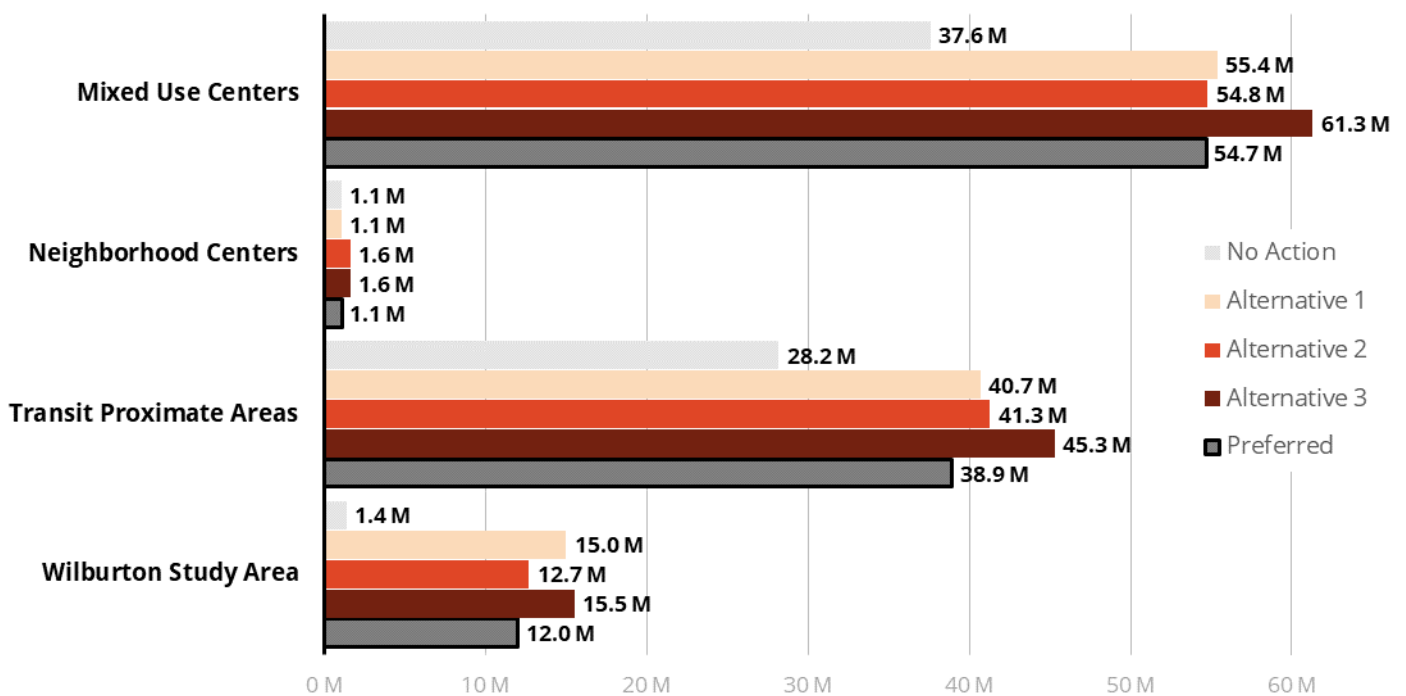
Location	Alternative 0 (No Action)	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
Citywide	40,000,000	58,500,000	58,300,000	67,300,000	60,300,000
Mixed Use Centers	37,600,000	55,400,000	54,800,000	61,300,000	54,700,000
Neighborhood Centers	1,100,000	1,100,000	1,600,000	1,600,000	1,100,000
Transit-Proximate Areas	28,200,000	40,700,000	41,300,000	45,300,000	38,900,000
Wilburton Study Area	1,400,000	15,000,000	12,700,000	15,500,000	12,000,000

SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Growth estimates are rounded to the nearest 100,000. The actual pace of growth could differ or be less than what is shown.

The Preferred Alternative included the Downtown overlay zones which reduce the height of buildings on the perimeter of Downtown, reducing the overall capacity for jobs and housing in Downtown. These overlay districts were not included in the calculation of land use capacity in the No Action and Action Alternatives 1 through 3.

The Preferred Alternative included higher capacity for jobs and housing in the center of Crossroads and Factoria (on the mall sites) than was considered in Action Alternatives 1 to 3.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Growth estimates are rounded to the nearest 100,000. The actual pace of growth could differ or be less than what is shown. The Mixed Use and Neighborhood Centers are mutually exclusive geographic areas, while the transit-proximate areas and Wilburton study area overlap with the boundaries of the Mixed Use and Neighborhood Centers. The Wilburton study area is part of the Wilburton-East Main Mixed Use Center.

The Preferred Alternative included the Downtown overlay zones which reduce the height of buildings on the perimeter of Downtown, reducing the overall capacity for jobs and housing in Downtown. These overlay districts were not included in the calculation of land use capacity in the No Action and Action Alternatives 1 through 3.

The Preferred Alternative included higher capacity for jobs and housing in the center of Crossroads and Factoria (on the mall sites) than was considered in Action Alternatives 1 to 3.

FIGURE 3-4 Net Capacity for Growth in Commercial Square Footage by Location (2019-2044), All Alternatives

Residential and Commercial Displacement

Citywide, adverse residential and commercial displacement impacts are expected under the No Action and Preferred Alternative and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*.

Wilburton Study Area

Adverse residential and commercial displacement impacts in the Wilburton study area are expected under the No Action and Preferred Alternative and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*. As discussed in the DEIS, residential displacement would be limited as very little housing is currently in the Wilburton study area.

ACCESS TO COMMUNITY ASSETS

More community amenities and gathering spaces are expected under the Preferred Alternative than the No Action Alternative to support increased activity levels in the Mixed Use and Neighborhood Centers and within a ¼-mile walking distance of Neighborhood Centers with good access to transit and/or jobs. Like Alternatives 2 and 3, many of these will be focused in areas with good access to existing or planned transit. Mixed Use Centers would also likely continue to consist of the widest variety of commercial, mixed use, and office-related uses (consistent with the center designations). **Net effects citywide—particularly in and near the Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and the Wilburton study area—regarding access to community assets are expected to be positive under the Preferred Alternative** and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and DEIS Section 3.3.6, *Impacts of Alternative 3*.

Good Access to Transit

Good access to transit is defined as frequent bus or train service (every 15 minutes) during the daytime and early evening.

Compared to the No Action Alternative and the other Action Alternatives, **additional capacity in the low-density residential areas would adversely contribute to a land use pattern that increases demand for community gathering spaces for households and requires more investment to have equitable access to such features**. Many low-density residential areas currently lack good access to transit and would continue to be more than ½-mile walking distance from planned major transit stops. Additional community amenities and gathering spaces are more likely to be added in low-density residential areas under the Preferred Alternative to support significantly increased housing

capacity. These would likely consist of new parks or open space, schools, and places of worship consistent with existing trends outside of the Mixed Use Centers.

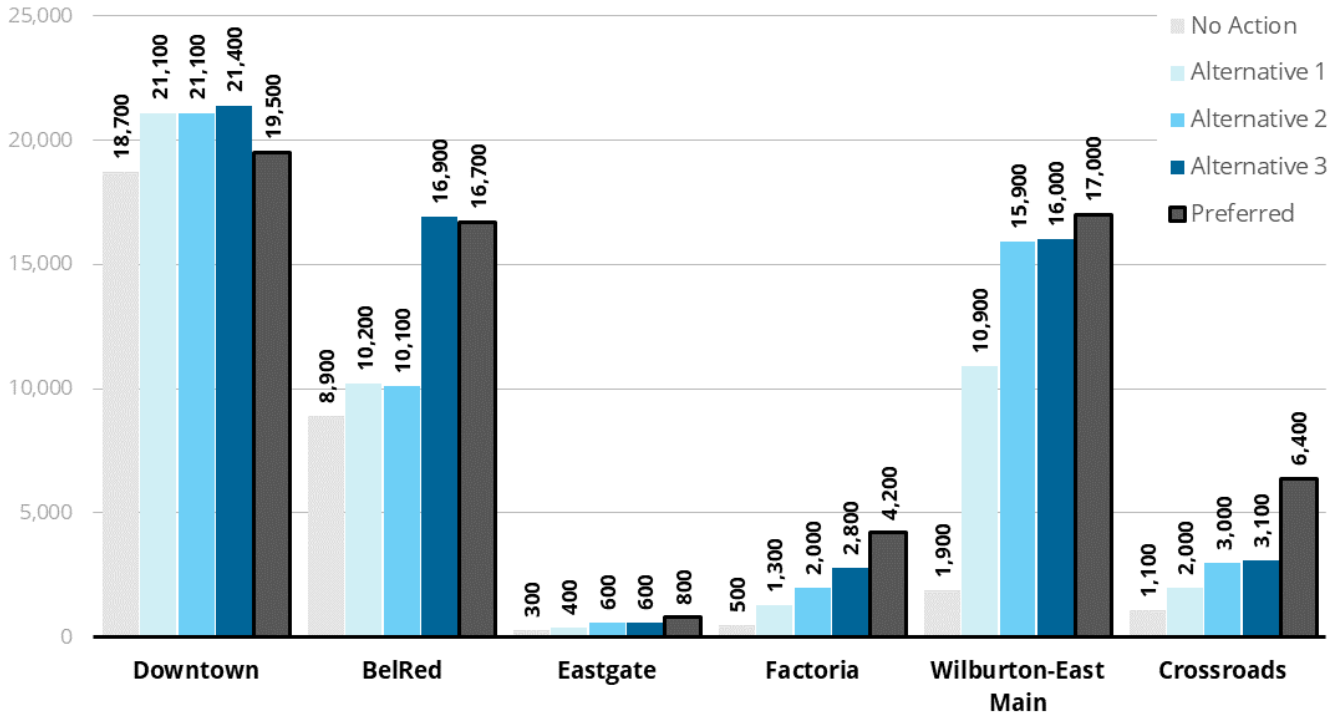
3.2.2 Preferred Alternative

GROWTH TARGETS AND LAND USE COMPATIBILITY

As described above under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **no adverse land use impacts related to the citywide growth targets are expected under the Preferred Alternative.** Capacity for new housing is highest under the Preferred Alternative (152,000 new units), and capacity for new jobs (185,000 new jobs) is within the range of the other Action Alternatives. See Figure 3-1.

Figure 3-2 and Figure 3-3 compare housing and job capacity, respectively, by location under the Preferred Alternative. Land use compatibility impacts in the **Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and Wilburton study area** would be similar to those described under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and under DEIS Section 3.3.5, *Impacts of Alternative 2*, and DEIS Section 3.3.6, *Impacts of Alternative 3*.

Compared to Alternatives 2 and 3, allowed heights at the edges of the **Mixed Use Centers** would transition to mid- and low-rise development similar to the heights of adjacent areas. Heights in the centers of the Mixed Use Centers would be similar to those under Alternative 3. Future land use patterns in BelRed, for example, are similar to Alternative 3 but include a more gradual stepping down of heights around the 130th station area (similar to Alternative 1), and a greater intensity of office use around the 120th/Spring District station area than the other Action Alternatives. Capacity for housing and job growth within the Mixed Use Centers would also be less concentrated in Downtown than the other Action Alternatives (see Table 3-4, **Figure 3-5**, and **Figure 3-6**). Land use compatibility impacts under the Preferred Alternative in the **Mixed Use Centers** and **transit-proximate areas** of the city that overlap the centers would be similar to those described under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and would not be an uncommon or new phenomenon within Bellevue's more urbanized centers.



SOURCES: City of Bellevue 2023; BERK 2023

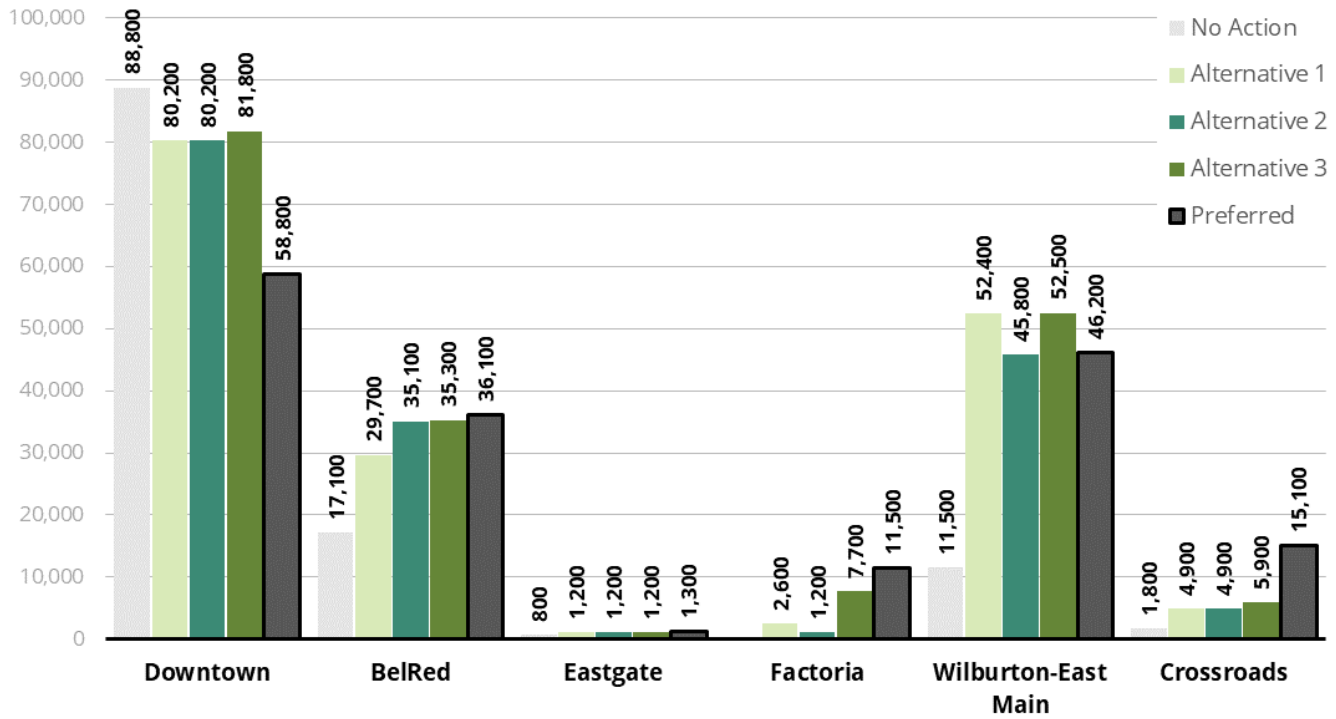
NOTES: Capacity estimates for new housing growth within each Mixed Use Center are rounded to the nearest 100. The actual pace of growth could differ or be less than what is shown.

The Preferred Alternative included the Downtown overlay zones which reduce the height of buildings on the perimeter of Downtown, reducing the overall capacity for jobs and housing in Downtown. These overlay districts were not included in the calculation of land use capacity in the No Action and Action Alternatives 1 through 3.

The Preferred Alternative included higher capacity for jobs and housing in the center of Crossroads and Factoria (on the mall sites) than was considered in Action Alternatives 1 to 3.

FIGURE 3-5 Net Housing Capacity by Mixed Use Center (2019–2044), All Alternatives

Like Alternatives 2 and 3, the intensity and mix of uses in and around most **Neighborhood Centers** would shift as infill development and redevelopment occur to reflect a more mixed use or higher density development pattern. Infill housing and mixed use with 2 to 4 stories would be allowed within the Neighborhood Centers, with middle housing types allowed in the surrounding areas. Three retail-focused **Neighborhood Centers** (Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village Shopping Center) would also allow slightly more housing density in low- to mid-rise buildings under the Preferred Alternative than Alternative 2 or 3—these centers currently consist of primarily smaller scale retail with some office uses and would likely shift to include more mixed use or residential uses over time. Land use compatibility impacts within the Neighborhood Centers would be similar to those described under DEIS Section 3.3.5, *Impacts of Alternative 2*, and DEIS Section 3.3.6, *Impacts of Alternative 3*.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES:

Capacity estimates for new job growth within each Mixed Use Center are rounded to the nearest 100. The actual pace of growth could differ or be less than what is shown. The Preferred Alternative included the Downtown overlay zones which reduce the height of buildings on the perimeter of Downtown, reducing the overall capacity for jobs and housing in Downtown. These overlay districts were not included in the calculation of land use capacity in the No Action and Action Alternatives 1 through 3.

The Preferred Alternative included higher capacity for jobs and housing in the center of Crossroads and Factoria (on the mall sites) than was considered in Action Alternatives 1 to 3.

FIGURE 3-6 Net Job Capacity by Mixed Use Center (2019–2044), All Alternatives

As described above, significant housing capacity would be added to **low-density residential areas** under the Preferred Alternative as a result of changes to incorporate capacity created under HB 1110 and HB 1337. Land use compatibility impacts in these areas are described under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*.

Citywide, adverse land use compatibility impacts are expected to be greatest under the Preferred Alternative but would be reduced to less-than-significant levels with proposed mitigation.

Wilburton Study Area

The Preferred Alternative includes an estimated capacity for an additional 14,800 housing units, 35,500 jobs, and 12.0 million square feet of commercial development in the Wilburton study area. This is approximately 14,600 housing units, 31,500 jobs, and 10.7 million

square feet of commercial development above the No Action Alternative. Capacity for new housing units is just above Alternative 3, and capacity for new jobs is slightly below Alternative 2.

Adverse land use compatibility impacts in the Wilburton study area are expected under the Preferred Alternative. Impacts would be similar to those described under DEIS Section 3.3.5, *Impacts of Alternative 2*, and DEIS Section 3.3.6, *Impacts of Alternative 3*, and would be reduced to less-than-significant levels with proposed mitigation.

DISPLACEMENT

Residential Displacement

As described above under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **moderately adverse residential displacement impacts are expected under the Preferred Alternative citywide** and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and DEIS Section 3.3.6, *Impacts of Alternative 3*. Impacts are likely highest under the Preferred Alternative as a result of the highest overall capacity for growth, particularly in the low-density residential areas where new housing capacity is significantly higher than any of the other alternatives (see Figure 3-2) and more redevelopment is likely to occur. Housing affordability was analyzed separately under the Preferred Alternative in Appendix L, *Transportation Preferred Alternative*. Per Appendix L and increased capacity as a result of HB 1110 and HB 1337, the Preferred Alternative would likely result in the largest net gain in affordable housing even though displacement risks are greatest.

See also Chapter 7, *Housing*, for a more detailed discussion of residential displacement risk, including housing supply, affordability and naturally occurring affordable housing, homeownership opportunities, varied housing typologies, and proposed measures to mitigate residential displacement.⁵

Commercial Displacement

As described above under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **adverse commercial displacement impacts are expected under the Preferred**

⁵ The displacement risk threshold in this chapter considers the potential for involuntary residential displacement based on the overall capacity for growth and land use patterns in the city. The residential displacement risk impact threshold in Chapter 7, *Housing* considers growth in relation to areas identified by the city at high risk at displacement.

Alternative citywide and would be similar to the other Action Alternatives (slightly less than Alternative 3 and more than Alternatives 1 or 2). Impacts would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and DEIS Section 3.3.6, *Impacts of Alternative 3*. Capacity for new jobs is similar to the other Action Alternatives (less than Alternative 3 and more than Alternatives 1 or 2; see Figure 3-3, Table 3-6, and Figure 3-4). No specific policies are proposed under the Preferred Alternative to preserve or support more affordable commercial space.

See also Chapter 5, *Population and Employment*, for a discussion of employment growth and job mix.

Wilburton Study Area

Moderately adverse residential and adverse commercial displacement impacts in the Wilburton study area are expected under the Preferred Alternative and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and DEIS Section 3.3.4, *Impacts of Alternative 1*.

ACCESS TO COMMUNITY ASSETS

As described above under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **net effects citywide and in the Wilburton study area regarding access to community assets are expected to be positive under the Preferred Alternative** and would be similar to those described under DEIS Section 3.3.2, *Impacts Common to All Alternatives*, and DEIS Section 3.3.6, *Impacts of Alternative 3*. However, **additional capacity in the low-density residential areas under the Preferred Alternative would adversely contribute to a land use pattern that limits convenient access to community gathering spaces for households**. Many low-density residential areas currently lack good access to transit and would continue to be more than a ½-mile walking distance from planned major transit stops without additional investment to improve access.

3.2.3 No Action Alternative

Impacts of the No Action Alternative for the city as a whole and the Wilburton study area are described above under Section 3.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and in DEIS Section 3.3.3, *Impacts of Alternative 0 (No Action)*.

3.3 Avoidance, Minimization, and Mitigation Measures

Mitigation measures include those described in DEIS Section 3.4, *Avoidance, Minimization, and Mitigation Measures*. These include existing regulations and commitments as well as incorporated plan features, such as focusing a large share of growth into the existing Mixed Use Centers with greater access to amenities, policies to support affordable housing across the city and mitigate residential displacement, and increased opportunities for mixed use development. Under the Preferred Alternative, allowed heights at the edges of the **Mixed Use Centers** would also transition to mid- and low-rise development similar to the heights of adjacent areas to reduce compatibility impacts.

The Preferred Alternative includes significant additional capacity for new housing in **low-density residential areas** as a result of additional changes to incorporate capacity created under HB 1110 and HB 1337. This increases capacity citywide and increases potential affordable housing opportunities, which could reduce residential displacement risks. While the greater intensity could result in secondary adverse impacts such as increased noise, light/glare, and shade/shadow (see Chapter 6, *Aesthetics*), the future development would be similar in scale to what is allowed under existing development regulations for single-family dwellings, and the city could establish standards for lot and site design as for single-family dwellings to mitigate the impacts—this could include improved development standards that are applied to all development in low-density areas to ensure sidewalk access, community gathering spaces, low-impact development (LID)/landscaping, etc. as development occurs.

Additional capacity in the low-density residential areas would contribute to an adverse land use pattern that increases demand for community gathering spaces for households and requires more investment to have equitable access to such features. Potential mitigation measures could include updates to the Parks and Open Space System Plan (or other similar plans), working with the city's Arts Program, or collaborating with community partners like schools and places of worship to identify opportunities to support new or expanded community amenities and gathering spaces in the low-density residential areas.

Under the Preferred Alternative, the city would revise parking standards for middle housing consistent with the requirements of

HB 1110.⁶ The reduced use of land for parking could increase the use of land for housing, landscaping, or other amenities and could result in an overall neutral or beneficial effect in terms of community design, particularly in areas where existing parking minimums are higher (e.g., zones currently intended for single-family detached housing within the low-density residential areas).

3.4 Significant Unavoidable Adverse Impacts

Additional growth and development will occur in Bellevue over time, and a generalized increase in development intensity is expected under all alternatives—this gradual conversion of low-intensity uses to higher intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. Citywide housing and job capacity are above the adopted target under all alternatives, although the No Action Alternative does not meet other new planning requirements for affordable housing across income bands or a range of housing types. **No potentially significant adverse land use impacts are identified related to the growth targets under the Preferred Alternative** with the application of additional measures to improve housing affordability and choice.

Future growth will likely result in temporary or localized land use compatibility issues as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives, and many are expected to resolve over time. **No significant adverse land use compatibility impacts are expected under the No Action Alternative or the Preferred Alternative** with implementation of existing and new development regulations, zoning requirements, and design guidelines.

Some residents and businesses may be displaced through redevelopment or priced out as land prices and rents increase. Limited redevelopment under the No Action Alternative could push land costs and rents higher than the Preferred Alternative, resulting in more potential for displacement as a result of rising costs. In contrast, potential displacement could occur under all alternatives but may be lower in the No Action Alternative as a result of lower overall capacity for growth. While it is impossible to avoid all involuntary displacement, proposed measures to improve housing affordability and choice throughout the city and to encourage mixed

⁶ [ESSB HB 1110](#) (Section 3.6.d-f) 2023.

use development would **mitigate potential adverse residential displacement impacts to less-than-significant levels under the Preferred Alternative**. Mandatory or voluntary measures to encourage a variety of commercial spaces and anti-displacement measures—such as a “right to return” policy, tenant relocation assistance, or community benefit agreements—would also help **mitigate potential adverse impacts of commercial displacement to less-than-significant levels as redevelopment occurs under the Action Alternatives (including the Preferred Alternative)**.

Access to amenities, diverse uses, and community gathering spaces will also likely improve over time as the city’s transit network expands and additional density is added. **No adverse impacts regarding access to community assets citywide are expected under the No Action Alternative or within the Wilburton study area under the No Action Alternative or Preferred Alternative**.

Under the Preferred Alternative, additional capacity in the low-density residential areas would adversely contribute to a land use pattern citywide that limits convenient access to community gathering spaces for households, but proposed mitigation measures would mitigate these adverse impacts to less-than-significant levels.



CHAPTER 4 Relationships to Plans and Policies

4.1 Updates to the DEIS

There is no new analysis related to the Plans and Policies chapter of the DEIS. Corrections to DEIS Table 4-5 are described in FEIS Chapter 15, *Corrections and Clarifications*.

4.2 Impacts

The thresholds of significance for analysis are the same as described in DEIS Section 4.3.1, *Thresholds of Significance*:

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

See DEIS Section 4.3.1 for an explanation of “consistency.”

4.2.1 Comparison of Preferred Alternative and No Action Alternative

CONSISTENCY WITH GROWTH MANAGEMENT ACT

The alternatives are evaluated for compatibility with GMA goals in **Table 4-1**. Both the No Action Alternative and the Preferred Alternative focus much of the future growth into existing Mixed Use Centers. The No Action Alternative assumes no substantial updates to the Comprehensive Plan strategy and would not align with newer GMA requirements, including those related to housing for all income bands and housing variety, whereas the Preferred Alternative would be consistent with these requirements and add more housing capacity.

TABLE 4-1 Evaluation of Consistency with GMA Goals

GMA Goal	Discussion
(1) Encourage growth in urban areas	Both alternatives focus growth in urban areas, with an emphasis on Mixed Use Centers. The No Action Alternative would focus a greater proportion of new housing and job capacity in Mixed Use Centers than the Preferred Alternative . However, the Preferred Alternative has greater total housing and job capacity in Mixed Use Centers than the No Action Alternative .
(2) Reduce sprawl	Both alternatives support the goal to reduce the potential for sprawl by incorporating growth within the city limits and focusing growth in Mixed Use Centers. The Preferred Alternative includes gentle density increases across the city in the form of low-density housing types. The Preferred Alternative focuses more housing growth in Neighborhood Centers. Both alternatives include housing and job capacity near transit. By accommodating growth in Bellevue, the potential for sprawl is reduced and rural areas outside of the city are less likely to be impacted by the pressure to accommodate regional growth.
(3) Encourage an efficient and multimodal transportation system	Both alternatives include new housing and job capacity close to transit and invest in multimodal transportation improvements in high-density areas. Both alternatives include policy support for multimodal transportation. However, the Preferred Alternative provides additional housing capacity in lower-density areas that are not well-served by transit, which creates the potential for increased vehicle miles traveled (VMT) under a full build-out scenario.
(4) Plan for and accommodate housing that is affordable, at different densities, and preserve housing stock	The No Action Alternative continues the current Comprehensive Plan policies forward, including some policies for affordable, diverse housing and preservation of housing stock. However, the No Action Alternative does not meet new requirements for affordable housing across income bands and a range of housing types. The Preferred Alternative accomplishes this by allowing gentle density increases across the city and adopting new affordable housing policies and incentives. The majority of housing capacity under the Preferred Alternative is in Mixed Use Centers, which are well served by transit and amenities.

GMA Goal	Discussion
(5) Promote economic development	Both alternatives include capacity for many new jobs. The Preferred Alternative at “build-out” would have more capacity for job growth (185,000), and the No Action Alternative at “build-out” would have less capacity (124,000), but both have capacity to meet the adopted target (70,000 jobs by 2044).
(6) Recognize property rights	Neither of the alternatives would conflict with property rights.
(7) Ensure timely and fair permit procedures	Bellevue would continue to process permits consistent with its adopted code under both alternatives .
(8) Protect agricultural, forest, and mineral lands	Since both alternatives provide capacity for growth within an incorporated urban area, they both contribute to the protection of resource lands by limiting the potential for sprawl on a regional level.
(9) Retain and enhance open space and support recreation opportunities	Both alternatives would continue to invest in parks and open space consistent with adopted plans and levels of service. More demand for recreation is likely to occur under the Preferred Alternative than the No Action Alternative due to greater capacity for growth.
(10) Protect the environment	<p>Both alternatives would continue to include Comprehensive Plan policies for protection of the environment. Both alternatives would also limit the potential for regional sprawl by adding growth to an urban area, which has impacts on regional vehicle emissions, energy use, and land use. Both alternatives include capacity for new jobs and housing near transit.</p> <p>The Preferred Alternative could support this goal better than the No Action Alternative by creating a better balance between job and housing capacity, which reduces incentives for sprawl; allowing greater housing density, which can support neighborhood walkability; focusing growth near transit; and investing in infrastructure that provides mobility options.</p> <p>However, the Preferred Alternative also includes capacity for gentle housing density in lower density areas, which are not well-served by transit. Under a full build-out scenario, this could result in higher VMT.</p>
(11) Foster citizen participation	Both alternatives foster public participation and have been developed through a robust outreach process.
(12) Ensure adequate public facilities and services	As growth increases under both alternatives , public facilities and services will experience greater demand. Service and capital planning will continue to support provision of adequate facilities and services consistent with the city’s adopted performance targets and levels of service.
(13) Encourage historic preservation	Future development under both alternatives will be required to comply with state and federal regulations for historic preservation.
(14) Shoreline management	Future development under both alternatives will be required to comply with federal, state, and local shoreline regulations.

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

CONSISTENCY WITH VISION 2050

The alternatives are evaluated for compatibility with specific VISION 2050 policies in **Table 4-2**.

TABLE 4-2 Evaluation of Consistency with VISION 2050

VISION 2050 Policy	Discussion
<p>MPP-DP-1 Develop high-quality, compact urban communities throughout the region's urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.</p>	<p>Both alternatives focus growth within the urban growth area. Under both alternatives, a greater share of citywide housing and job capacity would be shifted to the Mixed Use Centers than 2019 conditions. In the No Action Alternative, there is capacity for 47% of the city's housing units and 82% of the city's jobs in Mixed Use Centers, and in the Preferred Alternative, there is capacity for 38% of the city's housing units and 82% of the city's jobs in Mixed Use Centers. The Preferred Alternative provides more opportunity for choice in housing types by allowing more variety in low-density areas and more development overall. The Preferred Alternative is especially supportive of choices in housing types due to regulatory changes in support of middle housing and accessory dwelling units (ADUs), to meet HB 1110 and HB 1337 requirements.</p> <p>Both alternatives invest in multimodal transportation improvements in high-density areas, include additional housing and job capacity near transit, and include policy support for multimodal transportation. However, the Preferred Alternative also provides additional housing capacity in lower-density areas that are not well-served by transit.</p>
<p>MPP-DP-2 Reduce disparities in access to opportunity for the region's residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.</p>	<p>Both alternatives focus future growth into the existing Mixed Use Centers, which are generally well-served by transit. The Preferred Alternative would have capacity for 61% of citywide jobs and 28% of citywide housing units within ¼ mile of the frequent transit network. In comparison, the No Action Alternative would have capacity for 65% of citywide jobs and 35% of citywide housing units in these areas. However, given that the Preferred Alternative includes substantially greater housing and job capacity overall than the No Action Alternative, the Preferred Alternative creates a greater opportunity for growth near transit. Adding growth near transit, jobs, and amenities can support access to opportunity.</p> <p>The Preferred Alternative also supports a wider range of housing types and affordable housing, which would provide more options for households to live in Bellevue</p>

VISION 2050 Policy	Discussion
	<p>and access local opportunities. This is especially true due to regulatory changes under the Preferred Alternative in support of middle housing and ADUs, per HB 1110 and HB 1337.</p> <p>Bellevue is conducting an ongoing and robust community outreach process for the Comprehensive Plan Periodic Update that will continue under both alternatives.</p>
<p>MPP-DP-3 Enhance existing neighborhoods to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces.</p>	<p>Both alternatives include policies and regulations for multimodal connectivity. Both alternatives also focus much of the future growth capacity into the existing Mixed Use Centers, which are generally well-served by transit.</p>
<p>MPP-DP-9 Support urban design, historic preservation, and arts to enhance quality of life, support local culture, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region’s resiliency in adapting to changes or adverse events.</p>	<p>Both alternatives include policies and regulations to support urban design, historic preservation, and the arts.</p>
<p>MPP-DP-11 Identify and create opportunities to develop parks, civic places (including schools), and public spaces, especially in or adjacent to centers.</p>	<p>Under both alternatives, Bellevue would need to address park, trail, and school development.</p>
<p>MPP-RGS-7 Provide additional housing capacity in Metropolitan Cities in response to rapid employment growth, particularly through increased zoning for middle density housing. Metropolitan Cities must review housing needs and existing density in response to evidence of high displacement risk and/or rapid increase in employment.</p>	<p>Both alternatives add housing capacity. The Preferred Alternative adds substantially more housing capacity than the No Action Alternative, 47% of the assumed build-out is in low-density residential areas in the form of middle housing. The Preferred Alternative also results in a more balanced ratio of jobs to housing than the No Action Alternative (approximately 1.5 jobs per housing unit compared to 2.5 jobs per housing unit).</p>
<p>MPP-RGS-8 Attract 65% of the region’s residential growth and 75% of the region’s employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.</p>	<p>Both alternatives would focus much of the future growth into the existing Mixed Use Centers, which are generally well-served by transit. The Preferred Alternative also emphasizes additional growth near transit and in the Neighborhood Centers.</p>
<p>MPP-RGS-9 Focus a significant share of population and employment growth in designated regional growth centers.</p>	<p>Both alternatives would focus much of the future growth into the existing Mixed Use Centers. 43% of capacity for housing growth and 91% of capacity for job growth would be focused in Mixed Use Centers in the Preferred Alternative. 77% of capacity for housing growth and 96% of capacity for job growth would be focused in Mixed Use Centers in the No Action Alternative.</p>

VISION 2050 Policy	Discussion
<p>MPP-RGS-11 Encourage growth in designated countywide growth centers.</p>	<p>Both alternatives would focus much of the future growth into Mixed Use Centers and Candidate Countywide Centers (see Table 4-4). See DEIS Section 4.3.4, <i>Consistency with King County Countywide Planning Policies</i>, for an explanation of Candidate Countywide Centers.</p>
<p>MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.</p>	<p>The Preferred Alternative provides capacity for a greater total number of jobs and housing units near transit than the No Action Alternative. However, the share of total capacity that is near transit is slightly lower under the Preferred Alternative than the No Action Alternative. The Preferred Alternative also includes more housing capacity in lower density areas, which are not well-served by transit.</p>

SOURCES: PSRC 2020; BERK 2023

CONSISTENCY WITH KING COUNTY COUNTYWIDE PLANNING POLICIES (CPPs)

King County’s adopted Countywide Planning Policies (CPPs) establish a housing target of 35,000 units by 2044 for Bellevue. In FEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-1, *Net Capacity for Growth Citywide vs. Adopted Targets (2019–2044), All Alternatives*, summarizes the distribution of capacity for housing and job growth citywide under all alternatives compared to the adopted targets.

Both the Preferred Alternative and the No Action Alternative contain enough capacity to meet King County’s adopted minimum growth targets of 35,000 housing units and 70,000 jobs in Bellevue by 2044. The Preferred Alternative is consistent with the goals set by the CPPs, including housing diversity and choice, connections to businesses and community gathering spaces, access to amenities, a variety of transportation options, and environmental sustainability and resilience. The alternatives are evaluated for compatibility with overarching CPP goals in **Table 4-3**.

See DEIS Chapter 4 (page 4-16) for details on how the CPPs direct growth in centers and designation criteria for countywide centers. **Table 4-4** compares gross capacity in Bellevue’s Mixed Use Centers to the activity unit and geographic size requirements. All the Mixed Use Centers are within the size thresholds for countywide growth centers and meet the planned activity unit density criteria under all alternatives, including the No Action Alternative and Preferred Alternative.

TABLE 4-3 Evaluation of Consistency with CPPs Goals

CPP Goals	Discussion
<p>Environment Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.</p>	<p>Both alternatives will continue to include policies to protect the environment and prevent sprawl in other areas of the county. The Preferred Alternative includes a slightly lower share of growth capacity near transit than the No Action Alternative. However, the Preferred Alternative allows for taller buildings in Mixed Use Centers, similar to DEIS Alternative 3, and some Neighborhood Centers with higher densities. As described in FEIS Chapter 11, <i>Transportation</i>, the Preferred Alternative would have lower vehicle miles traveled (VMT) per capita than No Action, but greater VMT overall.</p>
<p>Development Pattern Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently and that protects Rural and Resource Lands.</p>	<p>Both alternatives focus much of the capacity in the Mixed Use Centers. The majority of the Mixed Use Centers have been designated as Candidate Countywide Centers by King County. The Preferred Alternative includes a lower share of housing and similar share of jobs in Mixed Use Centers than the No Action Alternative.</p> <p>The Preferred Alternative would also encourage more housing growth in Neighborhood Centers.</p>
<p>Urban Growth Area Goal Statement: The Urban Growth Area boundary is stable, and capacity within it shall increase over time to accommodate growth consistent with the Regional Growth Strategy and growth targets through land use patterns and practices that create vibrant, equitable, and sustainable communities</p>	<p>Both alternatives continue to focus growth in the urban area with an emphasis on Mixed Use Centers. The Preferred Alternative would encourage additional housing growth in the Neighborhood Centers.</p>
<p>Centers Goal Statement: King County grows in a manner that reinforces and expands upon a system of existing and planned high-capacity transit in central places within which concentrated residential communities and economic activities can flourish.</p>	<p>Both alternatives continue to focus growth in the Mixed Use Centers. The Preferred Alternative would encourage additional housing growth in the Neighborhood Centers.</p>
<p>Rural Area Goal Statement: The rural area geography is stable, and the level and pattern of growth within it provide for a variety of landscapes and open space lands, maintain diverse low-density communities, and support rural economic activities based on sustainable stewardship of the land.</p>	<p>Under both alternatives, reducing the potential for sprawl through increased growth and density in Bellevue would support the stability of rural areas. The Preferred Alternative also increases housing diversity in Bellevue. This provides greater opportunities for households to find housing that meets their needs within the city, creating less development pressure on or near rural lands.</p>
<p>Resource Lands Goal Statement: Resources lands are valuable long-term assets of King County and are renowned for their productivity and sustainable management.</p>	<p>Under both alternatives, reducing the potential for sprawl by concentrating growth in areas like Bellevue would also protect resource lands elsewhere in King County.</p>
<p>Housing Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.</p>	<p>Both alternatives provide policies in support of affordable, accessible, healthy, and safe housing. However, the No Action Alternative does not meet new requirements for affordable</p>

CPP Goals	Discussion
	housing across income bands and a range of housing types. The Preferred Alternative accomplishes this by allowing gentle density increases across the city and adopting new affordable housing policies and incentives. The Preferred Alternative has more “build-out” capacity for housing overall (152,000 units above existing) than the No Action Alternative (41,000 units above existing).
Economy Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.	Both alternatives have capacity for job growth above the adopted target (70,000 new jobs by 2044). The Preferred Alternative has “build-out” capacity for 185,000 additional jobs (which is between what was studied in DEIS Alternatives 2 and 3), and the No Action Alternative has “build-out” capacity for 124,000 additional jobs.
Transportation Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.	A complete and connected multimodal transportation system would be able to support both alternatives .
Public Facilities and Services Overarching Goal: County residents in both urban and rural areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.	Growth under both alternatives would increase demand for public facilities and services. Bellevue would continue to plan for facilities and services consistent with adopted levels of service.

SOURCES: King County Countywide Planning Policies 2021; BERK 2023

TABLE 4-4 Mixed Use Center Activity Units

Center	Size (Acres)	Activity Units per Acre					
		Existing (2021)	No Action	Alt 1	Alt 2	Alt 3	Preferred Alt
BelRed	426 ✓	48 ✓	104 ✓	141 ✓	153 ✓	190 ✓	191 ✓
Eastgate	173 ✓	48 ✓	46 ✓	50 ✓	53 ✓	53 ✓	56 ✓
Factoria	212 ✓	55 ✓	56 ✓	80 ✓	81 ✓	120 ✓	153 ✓
Wilburton-East Main	362 ✓	39 ✓	79 ✓	249 ✓	262 ✓	281 ✓	271 ✓
Crossroads	427 ✓	34 ✓	47 ✓	59 ✓	65 ✓	68 ✓	107 ✓

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

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

✓ Meets criteria.

✗ Does not meet criteria.

The King County CPPs were amended in November 2023 to reflect the requirements of HB 1220 and recommendations from the Growth Management Planning Council's Affordable Housing Committee. Key amendments included:

- References to allocating housing needs for all economic segments of the population, as provided by the Department of Commerce.
- Defining the role of cities in planning for and accommodating their allocated shares of countywide housing needs for each income band and emergency housing, emergency shelters, and permanent supportive housing.
- Housing allocations by income band for 2019–2044.
- References to the Growth Management Planning Council's process for plan review and monitoring.
- Updated technical appendix to reflect the housing need calculation and allocation processes.
- Updated strategies for achieving policy goals.

The No Action Alternative is not consistent with these amendments to the CPPs. The Preferred Alternative is consistent with the amended CPPs, as it includes enough capacity to meet housing needs for all income bands and policies to remove barriers to affordability. See Chapter 7, *Housing*, for more details on housing affordability under the Preferred Alternative.

The CPPs also offer an additional county-level designation of centers to focus resources. Table 4-4 compares gross capacity in Bellevue's Mixed Use Centers to the activity unit and geographic size requirements for county-level designation as a countywide growth center. To be designated as a countywide growth center, an area must have an existing density of at least 18 activity units and a planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160 and 500 acres in size, include frequent, all-day transit service, and provide evidence of the center's regional or countywide role and future market potential to support the planned densities. The city submitted five Mixed Use Centers to King County for consideration as Countywide Centers in August 2021 (all of the Mixed Use Centers except for Downtown, which is already a PSRC-designated Metro Regional Growth Center); these were reviewed by King County and given "candidate" status as of December 1, 2021.

4.2.2 Impacts of the Preferred Alternative

Impacts of the Preferred Alternative are as described above in Section 4.2.1, *Comparison of Preferred Alternative and No Action Alternative*. The Preferred Alternative is consistent with the GMA, VISION 2050, and the King County Countywide Planning Policies.

4.2.3 Impacts of the No Action Alternative

Impacts of the No Action are as described above in Section 4.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and in DEIS Section 4.3, *Potential Impacts*. The No Action Alternative is mostly consistent with GMA, VISION 2050, and the King County Countywide Planning Policies, but does not meet new requirements in the GMA, including those relating to housing capacity for all income bands and housing variety.

4.3 Avoidance, Minimization, and Mitigation Measures

Mitigation measures are the same as those described in DEIS Section 4.4, *Avoidance, Minimization, and Mitigation Measures*. These include the development of new or revised zoning and development regulations citywide and in the Wilburton study area to implement policy changes that align with state and regional plans and policies.

4.4 Significant Unavoidable Adverse Impacts

As described in DEIS Section 4.5, *Significant Unavoidable Adverse Impacts*, the No Action Alternative would not include changes to the Comprehensive Plan policies or regulations, so inconsistencies with state and regional goals and requirements would occur. The Preferred Alternative amends the Comprehensive Plan for consistency with these requirements. **Significant unavoidable adverse impacts are not expected to occur.**



CHAPTER 5 Population and Employment

5.1 Updates to the DEIS

There is no new analysis related to the Population and Employment chapter of the DEIS. Several corrections and clarifications are detailed in Chapter 15, *Corrections and Clarifications*.

5.2 Impacts

In addition to a general analysis of population and employment impacts, there are two thresholds for analysis, the same as described in DEIS Chapter 5, *Population and Employment*:

- **Economic vision:** The action would result in conflicts between the mix of jobs and the city's economic vision.
- **Exposure to contaminated sites and traffic:** The action would result in population growth in areas with high exposure to contaminated sites and proximity to traffic. This threshold focuses on the exposure of people to these impacts, rather than the impact to the environment itself, which is detailed in Chapter 8, *Air Quality and GHG Emissions*.

5.2.1 Comparison of Preferred Alternative and No Action Alternative

Table 5-1 summarizes the impacts of each alternative related to population and employment.

TABLE 5-1 Population and Employment Impacts Summary

	No Action Alternative	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
CITYWIDE					
Housing Target	35,000 (same for all alternatives)				
Job Target	70,000 (same for all alternatives)				
New Housing Units Capacity	41,000 (Lowest)	59,000	77,000	95,000	152,000 (Highest)
Population Capacity	94,500 (Lowest)	136,000	177,600	219,100	350,600 (Highest)
Job Capacity	124,000 (Lowest)	179,000	177,000	200,000 (Highest)	185,000
Job Sector Mix	Mostly Office (66%), Lower Share of Medical (6%), Highest Share of Retail (10%)	Mostly Office (67%), Higher Share of Medical (9%), Lower Share of Retail (9%)	Mostly Office (64%), Highest Share of Medical (11%), Lower Share of Retail (9%)	Mostly Office (66%), Higher Share of Medical (9%), Lower Share of Retail (9%)	Office is largest sector (64%), Higher Share of Medical (10%), Lowest Share of Retail (8%)
Population Capacity Near Contaminated Sites and Traffic	Lowest Impact (least capacity)	Higher Impact	Higher Impact	Higher Impact	Highest Impact (most capacity)
Alignment with Economic Dev. Plan	Aligns (job capacity in Office and Retail)	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, more job diversity, housing diversity)
Average Wages	Higher than existing	Higher than Alt 0	Higher than Alt 0	Higher than Alt 0	Higher than Alt 0
WILBURTON STUDY AREA					
New Housing Units Capacity	300 (Lowest)	9,200	14,200	14,300	14,800 (Highest)
Population Capacity	580 (Lowest)	17,700	27,300	27,500	28,500 (Highest)
Job Capacity	3,900 (Lowest)	44,800 (Highest)	38,100	44,500	35,500

	No Action Alternative	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Job Sector Mix	Medical sector is largest (40%), Office 30%, Retail 16%	Office sector is largest (62%), Medical 27%, Retail 6%	Office sector is largest (58%), Medical 31%, Retail 6%	Office sector is largest (64%), Medical 24%, Retail 6%	Office sector is largest (64%), Medical 25%, Retail 6%
Population Capacity Near Contaminated Sites and Traffic	Lowest Impact (least capacity)	Higher Impact	Higher Impact	Higher Impact	Highest Impact (most capacity)
Alignment with Economic Dev. Plan	Least Aligned	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, housing diversity)	Aligns (job capacity in Office and Retail, housing diversity)
Average Wages	Higher than existing	Higher than Alt 0	Higher than Alt 0	Higher than Alt 0	Higher than Alt 0

SOURCE: BERK 2023

NOTE: Population capacity is estimated based on the citywide occupancy rate (93 percent) and average household size (2.48 persons citywide, 2.07 for the Wilburton study area). Housing capacity in the Wilburton study area is all multi-family units, so the average household size used for the Wilburton analysis is the average household size for multi-family units.

POPULATION

The potential impacts identified include analysis of the “build-out” housing capacity. It is not expected that the build-out housing capacity would all occur by 2044, but this capacity is used to evaluate potential environmental impacts associated with the alternatives.

Both the No Action and Preferred Alternatives will result in housing growth, but the amount of capacity varies. The housing capacity under both the No Action and Preferred Alternatives is higher than the citywide growth target of 35,000 new housing units by 2044.

The Preferred Alternative includes capacity for 152,000 housing units. This is equal to approximately 351,000 new residents (assuming a 93 percent occupancy rate and 2.48 household size). This is substantially higher than the No Action Alternative, which has capacity for 41,000 new housing units or approximately 94,500 new residents. Much of this additional capacity for housing growth is in the low-density residential areas due to increased allowances for middle housing types. This increase in housing capacity under a build-out scenario would increase density and activity levels in the city more than the No Action Alternative.

Both alternatives create more opportunities for affordable housing, especially the Preferred Alternative, which would create more opportunities for households with incomes below 80 percent Area Median Income (AMI). The Preferred Alternative also provides more diversity in housing types, which could provide housing opportunities for a wider range of incomes and household sizes in Bellevue.

Population in the Wilburton study area will also grow under both alternatives. Under the Preferred Alternative, there is capacity for 14,800 new housing units, compared to 300 housing units in the No Action Alternative. Housing capacity could result in 28,500 new residents in the Wilburton study area under the Preferred Alternative, compared to approximately 580 under the No Action Alternative.

EMPLOYMENT

Both the No Action Alternative and the Preferred Alternative result in a greater capacity for jobs. The capacity for jobs is higher than the citywide growth target of 70,000 new jobs by 2044. The potential impacts identified include analysis of the build-out job capacity. It is not expected that the build-out job capacity would all occur by 2044,

but this capacity is used to evaluate potential environmental impacts associated with the alternatives.

The city's job target is 70,000 by 2044 in both alternatives. An increase in jobs may result in more residents of working age. The Preferred Alternative includes more job capacity (185,000) than the No Action Alternative (124,000). Both alternatives focus most of the city's capacity for job growth in Mixed Use Centers (91 percent of growth in the Preferred Alternative and 96 percent in the No Action Alternative). Capacity for job growth in transit-proximate areas is similar in both alternatives, at 61 percent for the Preferred Alternative and 69 percent for the No Action Alternative. Low-density areas see no job growth under either alternative.

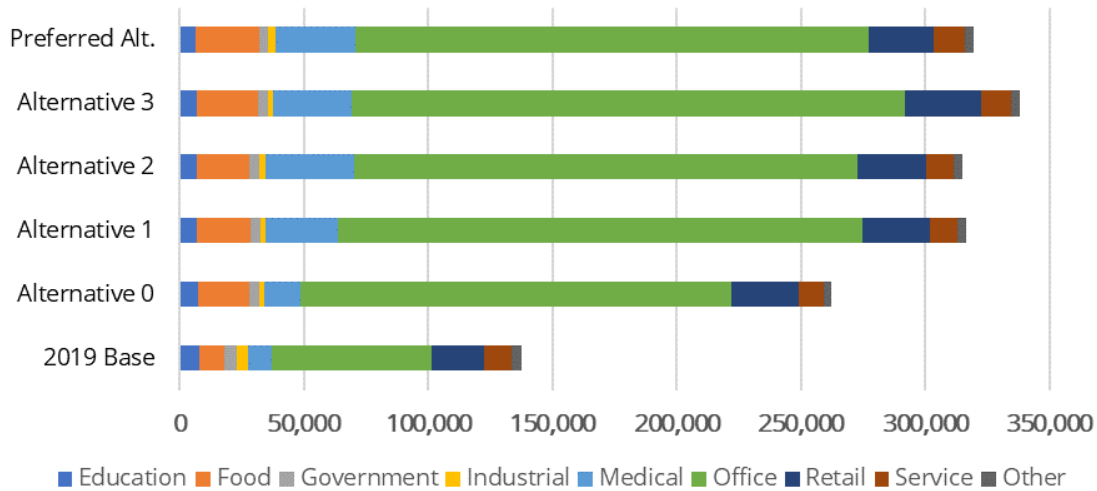
The Wilburton study area share of citywide job capacity growth is substantially higher under the Preferred Alternative (19 percent) than under the No Action Alternative (3 percent). The Preferred Alternative has capacity for 35,500 new jobs, and the No Action Alternative has capacity for 3,900 new jobs. Additional capacity under the Preferred Alternative could result in 14 percent of overall city jobs located in Wilburton compared to 5 percent under the No Action Alternative, under a full build-out scenario.

CITY'S ECONOMIC VISION AND JOB MIX

Similar to as described in DEIS Section 5.3.2, *Impacts Common to All Alternatives*, all alternatives, including the No Action and Preferred Alternatives, create capacity for new jobs. There is citywide capacity for a different mix of job types under each alternative, as described in **Figure 5-1**.

Strategies in the Economic Development Plan suggest that a mix of job types, a diverse retail mix, and thriving digital and creative industries are priorities relating to employment. The plan also supports encouraging a variety of housing choices.

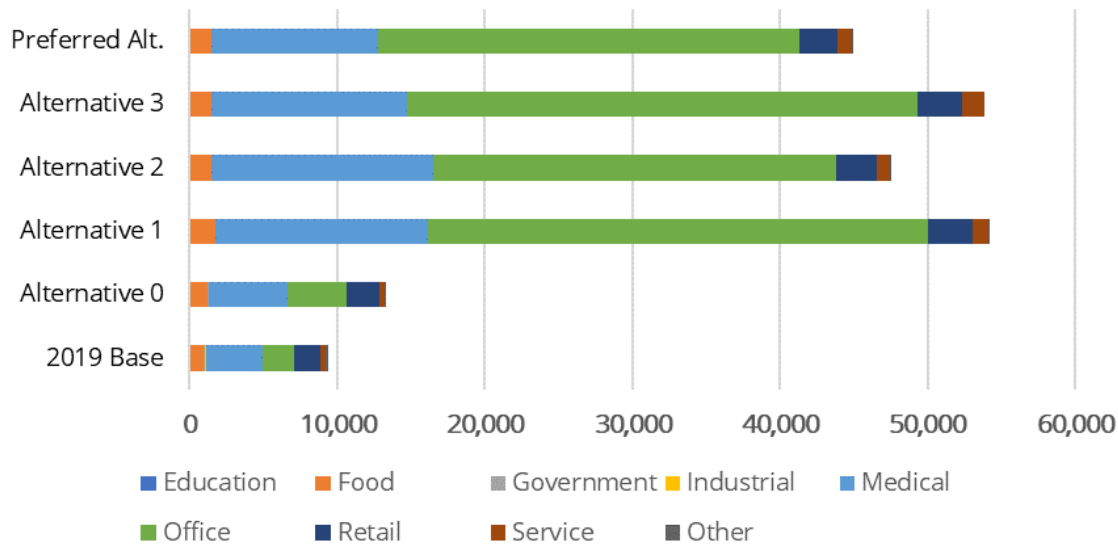
Citywide, the Preferred Alternative includes capacity for a larger percentage of Medical jobs (10 percent) and lower percentage of Office jobs (64 percent) than the No Action Alternative (6 percent Medical jobs and 66 percent Office jobs). The Retail sector makes up a slightly smaller percentage of the capacity under the Preferred Alternative (8 percent versus 10 percent). The Food, Government, Industrial, Service, and Education sectors make up a similar proportion of overall job capacity under both alternatives.



SOURCE: City of Bellevue 2023

FIGURE 5-1 Total Job Capacity (Citywide)

As shown in **Figure 5-2**, in the Wilburton study area, the job mix also differs between the No Action Alternative and the Preferred Alternative. The job mix in the Preferred Alternative in the Wilburton study area is similar to the mix studied under Alternative 3 in the DEIS. The Office sector makes up 30 percent of job capacity in the No Action Alternative but 64 percent of job capacity in the Preferred Alternative. The Medical sector makes up a smaller proportion of capacity in the Preferred Alternative (25 percent) compared to the No Action Alternative (40 percent). The Food and Retail sectors are also a smaller proportion of capacity under the Preferred Alternative (3 percent and 6 percent, respectively, compared to 9 percent and 16 percent under the No Action Alternative). The Government, Education, Industrial, and Service sectors have similar shares of job capacity under both alternatives.



SOURCE: City of Bellevue 2023

FIGURE 5-2 Total Jobs (Wilburton Study Area)

Citywide, the No Action Alternative has a greater emphasis on Office jobs than the Preferred Alternative (capacity for approximately 173,000 jobs compared to 128,000 jobs, respectively). Office job capacity may be more likely to support thriving digital industries but could also have the effect of displacing creative industries. Greater capacity under the Preferred Alternative for Medical sector jobs could create more diversity of job types. The Retail sector makes up a lower citywide *share* of job capacity in the Preferred Alternative than the No Action Alternative, but the overall capacity number is similar (25,000 Retail jobs compared to 27,000). The Preferred Alternative also supports more housing choices through more variety in allowed housing types, particularly for middle housing, and incentives.

Additionally, the No Action Alternative, under a built-out scenario, would result in 2.5 times as many jobs as housing units. This is an increase over existing conditions, where there are 2.2 times as many jobs as housing units. The Preferred Alternative would create more balance between jobs and housing, with 1.5 times as many jobs as housing units under a “built-out” scenario.

Overall, due to an increased emphasis on housing variety and job diversity, and greater job capacity overall, the Preferred Alternative is more aligned with the city’s economic vision.

EXPOSURE TO CONTAMINATED SITES AND PROXIMITY TO TRAFFIC

As described in DEIS Chapter 5, the analysis is based on pollution datasets from the U.S. Environmental Protection Agency (EPA) EJScreen tool. See DEIS Section 5.3.2, *Impact Common to All Alternatives*, page 5-16, for more details on this tool and areas of Bellevue with the highest exposures.

Impacts of the No Action Alternative are as described on DEIS pages 5-16 and 5-17, and impacts of the Preferred Alternative are consistent with the discussion for the other Action Alternatives. The Preferred Alternative adds substantially more housing capacity than the No Action Alternative and would have greater impacts relating to environmental exposures (see **Table 5-2**). This is especially true for areas proximate to Superfund sites, Risk Management Plan (RMP) areas, traffic generally, and highways.

TABLE 5-2 Traffic and Contamination Proximity and Total Housing Unit Capacity

	Alt 0	Alt 1	Alt 2	Alt 3	Preferred Alt
Unit capacity in areas over 80th percentile for proximity to Superfund sites	17,968	19,264	21,349	24,336	47,918
Unit capacity in areas over 80th percentile areas for proximity to RMPs	20,460	33,719	39,922	48,055	49,925
Unit capacity in areas over 80th percentile areas for proximity to hazardous waste	42,417	45,531	49,163	53,262	52,044
Unit capacity in areas over 80th percentile areas for proximity to traffic	51,098	63,985	72,976	79,278	91,940
Unit capacity within 500 feet of highways	3,874	5,418	6,430	7,855	9,104

SOURCES: EPA EJScreen 2021; City of Bellevue 2023; BERK 2023

NOTES: Environmental exposures are generally greater under the Preferred Alternative due to the added capacity for middle housing to meet new state requirements under HB 1110. Superfund proximity exposure is especially high under the Preferred Alternative because much of this area happens to be lower density under current conditions, with substantial middle housing capacity added in the Preferred Alternative.

5.2.2 Impacts of the Preferred Alternative

As described above under Section 5.2.1, *Comparison of Preferred Alternative and No Action Alternative*, the Preferred Alternative adds capacity for 152,000 additional housing units or approximately 350,600 residents. In total, 47 percent of this growth is directed into low-density residential areas due to added capacity for middle housing. The Wilburton study area has capacity for 14,800 housing units (approximately 28,500 residents).

There is capacity for 185,000 jobs under the Preferred Alternative, which is higher than the city's job target of 70,000 by 2044 and less than the capacity for housing in DEIS Alternative 3. The Wilburton study area contains 19 percent of the job growth capacity (35,500 jobs).

The overall job mix is as described above under Section 5.2.1, *Comparison of Preferred Alternative and No Action Alternative*. The Preferred Alternative generally aligns with the city's economic vision as it provides diversity in job types (including a greater emphasis on Medical sector jobs), greater job capacity overall, and increased housing variety.

The Preferred Alternative adds more housing capacity than the No Action Alternative in areas close to traffic and possible contamination, as shown in Table 5-2. This is true for areas proximate to Superfund sites, RMPs, hazardous waste, and traffic, and for areas within 500 feet of highways.

5.2.3 Impacts of the No Action Alternative

Impacts of the No Action Alternative for the city as a whole and the Wilburton study area are as described above under Section 5.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and in DEIS Section 5.3.3, *Impacts of Alternative 0 (No Action)*.

5.3 Avoidance, Minimization, and Mitigation Measures

Mitigation measures are the same as those described in DEIS Section 5.4, *Avoidance, Minimization, and Mitigation Measures*. This includes measures in addition to incorporated Comprehensive Plan features and existing commitments, such as programs to mitigate small business displacement; strategies to mitigate exposure to

traffic and contaminated sites through buffering, urban design, and reducing vehicle emissions; and updates to zoning and development regulations in the Wilburton study area.

5.4 Significant Unavoidable Adverse Impacts

As described in DEIS Section 5.5, *Significant Unavoidable Adverse Impacts*, population and job growth will occur under all alternatives citywide and in the Wilburton study area. Mitigation measures could address effects on population growth from contaminated sites and traffic. Both the No Action Alternative and the Preferred Alternative align to some extent with the city's Economic Development Plan.

Significant unavoidable adverse impacts on population and employment are not expected under either alternative.



CHAPTER 6 Aesthetics

6.1 Updates to the DEIS

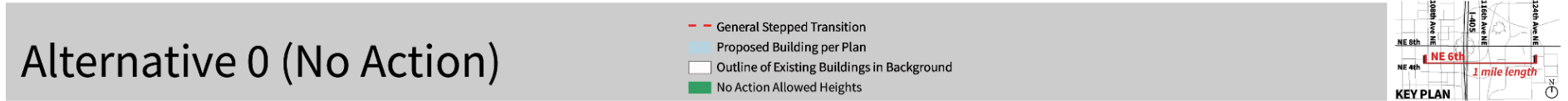
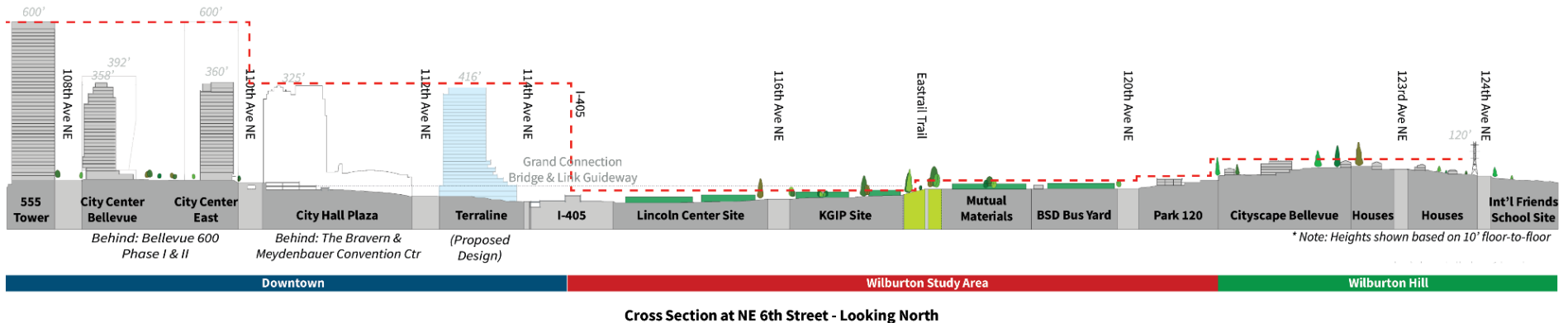
To better illustrate the aesthetic impacts of each DEIS alternative, cross-section diagrams showing height transitions in the Wilburton study area were produced (see **Figure 6-1**, **Figure 6-2**, **Figure 6-3**, and **Figure 6-4**).

The cross-sections show the relationship between theoretical building envelopes in the Wilburton study area with topography, vegetation, and nearby buildings (existing, recently constructed, and proposed) along the section cut. The section cut is taken from an east-west direction approximately along the NE 6th Street alignment looking north, with 110th Avenue NE on the left and 124th Avenue NE on the right.

The Wilburton study area sits at a lower elevation topographically compared to Downtown Bellevue and the Wilburton neighborhood's residential areas. The Lincoln Center site between I-405 and 116th Avenue NE generally sits at the lowest point; it is approximately 50 feet lower than Eastrail and 130 feet lower than the top of Wilburton Hill to the east, and 25 feet lower than 112th Avenue NE and 85 feet lower than 108th Avenue NE to the west in Downtown.

The cross-sections do not reflect any specific building design or site-specific development project proposal in the Wilburton study area. The colors represent applicable land uses within the Wilburton study area. Outside the Wilburton study area, grey buildings indicate existing buildings along the section cut, light blue buildings indicate

Alternative 0 (No Action)

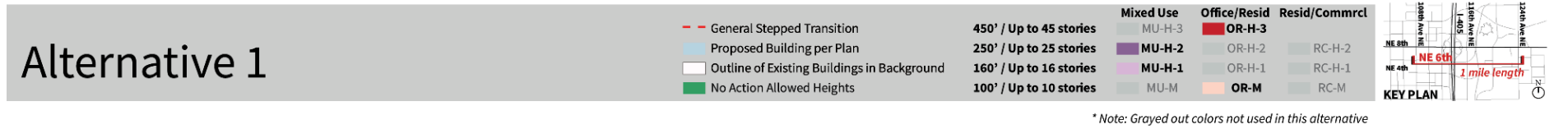
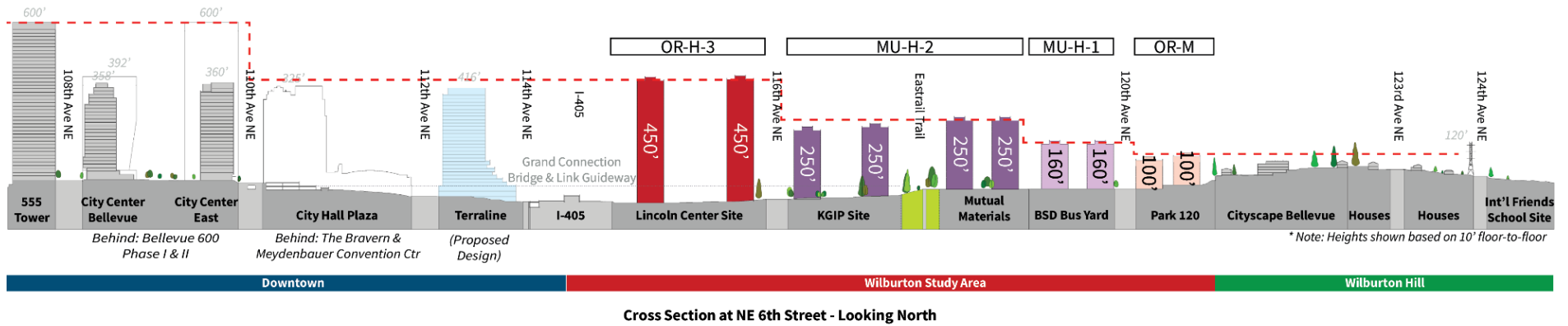


NOTES: Buildings represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal. Building stories in the Wilburton study area represent a 10-foot building floor.

FIGURE 6-1 Alternative 0 (No Action): Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North

Building heights east of I-405 would be significantly lower than Downtown buildings based on current development regulations.

Alternative 1

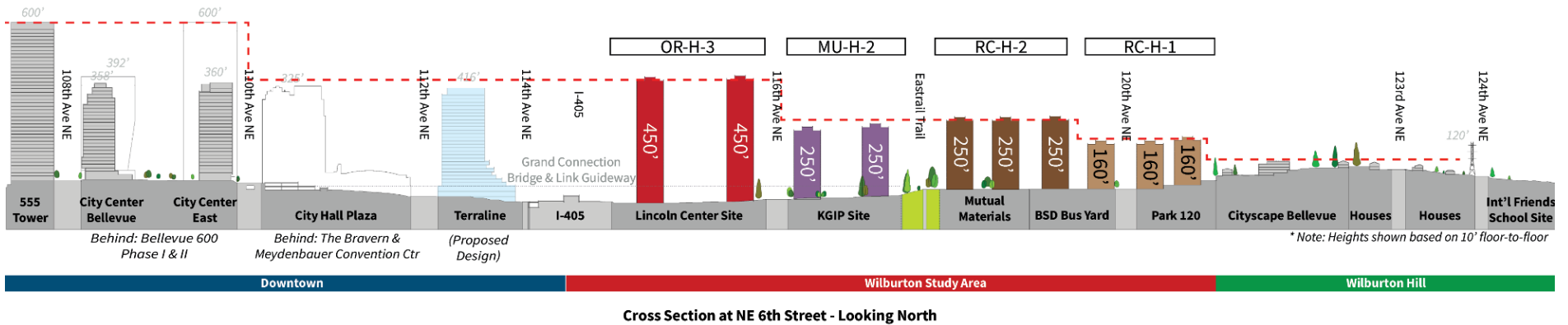


NOTES: Building colors in the Wilburton study area are based on land uses in Figure 6-4 in the DEIS. Buildings represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal. Building stories in the Wilburton study area represent a 10-foot building floor.

FIGURE 6-2 Alternative 1: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North

Building rooflines east of I-405 in the Wilburton study area would generally match Downtown buildings along 112th Avenue NE based on current development regulations, before stepping down east of 116th Avenue NE. A gradual stepdown would also occur east of Eastrail, and then east of 120th Avenue NE. Rooflines east of 120th Avenue NE would generally be level with buildings east of the study area based on topography.

Alternative 2



Alternative 2

<ul style="list-style-type: none"> --- General Stepped Transition ■ Proposed Building per Plan Outline of Existing Buildings in Background ■ No Action Allowed Heights 	<ul style="list-style-type: none"> 450' / Up to 45 stories 250' / Up to 25 stories 160' / Up to 16 stories 100' / Up to 10 stories 	<table border="0"> <tr> <td>Mixed Use</td> <td>Office/Resid</td> <td>Resid/Commrc'l</td> </tr> <tr> <td>MU-H-3</td> <td>OR-H-3</td> <td></td> </tr> <tr> <td>MU-H-2</td> <td>OR-H-2</td> <td>RC-H-2</td> </tr> <tr> <td>MU-H-1</td> <td>OR-H-1</td> <td>RC-H-1</td> </tr> <tr> <td>MU-M</td> <td>OR-M</td> <td>RC-M</td> </tr> </table>	Mixed Use	Office/Resid	Resid/Commrc'l	MU-H-3	OR-H-3		MU-H-2	OR-H-2	RC-H-2	MU-H-1	OR-H-1	RC-H-1	MU-M	OR-M	RC-M	<p>KEY PLAN</p>
Mixed Use	Office/Resid	Resid/Commrc'l																
MU-H-3	OR-H-3																	
MU-H-2	OR-H-2	RC-H-2																
MU-H-1	OR-H-1	RC-H-1																
MU-M	OR-M	RC-M																

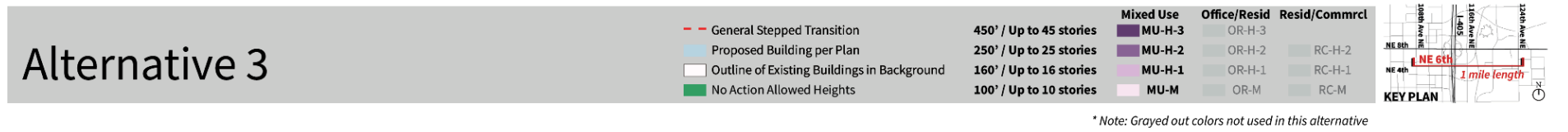
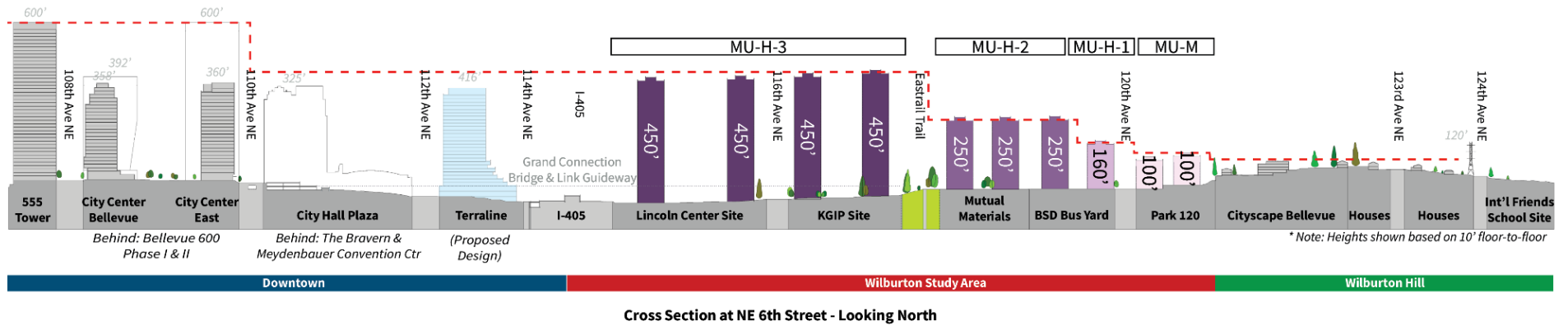
** Note: Grayed out colors not used in this alternative*

NOTES: Building colors in the Wilburton study area are based on land uses in Figure 6-5 in the DEIS. Buildings represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal. Building stories in the Wilburton study area represent a 10-foot building floor.

FIGURE 6-3 Alternative 2: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North

Building rooflines east of I-405 in the Wilburton study area would generally match Downtown buildings along 112th Avenue NE based on current development regulations, before stepping down east of 116th Avenue NE. A gradual stepdown would also occur east of Eastrail, which would then stay generally level until the east edge of the study area. There would be a modest stepdown to the roofline of buildings east of the study area.

Alternative 3



NOTES: Building colors in the Wilburton study area are based on land uses in Figure 6-6 in the DEIS. Buildings represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal. Building stories in the Wilburton study area represent a 10-foot building floor to floor.

FIGURE 6-4 Alternative 3: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, Looking North

Building rooflines east of I-405 in the Wilburton study area would generally match Downtown buildings along 112th Avenue NE based on current development regulations, before stepping down east of Eastrail. A gradual stepdown would also occur east of Eastrail, and then east of 120th Avenue NE. Rooflines east of 120th Avenue NE would generally be level with buildings east of the study area based on topography.

proposed buildings along the section cut, and white outlined buildings indicate existing or in-construction buildings located beyond the section cut in the background. The red dashed line shows the relationship and stepdown of potential building rooflines.

6.2 Impacts

The potential impacts identified for the alternatives include analysis of the “build-out” housing unit capacity and job capacity associated with each alternative. For the No Action Alternative and the Preferred Alternative, these capacities for growth are higher than overall citywide growth targets of 35,000 new housing units and 70,000 new jobs by 2044. It is not expected that the build-out housing and job capacities would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the alternatives. See Chapter 2, *Preferred Alternative*, for a detailed description of the alternatives.

Thresholds of significance for the aesthetics analysis are the same as described in DEIS Chapter 6:

- **Urban form:** The action would result in impacts that conflict with the desired form.
- **Viewsheds:** The action would result in impacts on important public views citywide and from specific locations in the Wilburton study area.
- **Shadows:** The action would result in shadow impacts on public open space and specific locations for the Wilburton study area.
- **Light and glare:** The action would result in increases to light and glare that could hinder public use and enjoyment of public spaces.

6.2.1 Comparison of Preferred Alternative and No Action Alternative

Table 6-1 summarizes the impacts of each alternative related to aesthetics.

TABLE 6-1 Summary of Aesthetic Impacts

Alternative	Alternative 0 (No Action)	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
CITYWIDE					
Urban form	Lowest Impact	Higher Impact	Higher Impact	Higher Impact	Highest Impact
Viewsheds	Lowest Impact	Higher Impact	Higher Impact	Highest Impact	Similar to Alternative 3
Shadows	Lowest Impact	Higher Impact	Higher Impact	Highest Impact	Similar to Alternative 3
Light and glare	Lowest Impact	Higher Impact	Higher Impact	Higher Impact	Highest Impact
WILBURTON STUDY AREA					
Urban form	Lowest Impact	Higher Impact	Higher Impact	Highest Impact	Similar to Alternative 3
Viewsheds	Lowest Impact	Higher Impact	Higher Impact	Highest Impact	Similar to Alternative 3
Shadows	Lowest Impact	Lower Impact on Eastrail, Lower Impact on Homes to the East	Higher Impact on Eastrail, Highest Impact on Homes to the East	Highest Impact on Eastrail, Lower Impact on Homes to the East	Higher Impact on Eastrail, Lower Impact on Homes to the East
Light and glare	Lowest Impact	Higher Impact	Higher Impact	Highest Impact	Similar to Alternative 3

SOURCE: BERK 2023

NOTE: “Higher Impact” indicates that the alternative is likely to have greater impacts than the alternative with the lowest expected impact. For “urban form,” higher impacts are expected where buildings may be taller or where more-intense development would potentially occur.

URBAN FORM

Citywide

Like the alternatives studied in the DEIS, the Preferred Alternative would see increases in the number of jobs and housing units citywide and development of vacant and redevelopable land, which would impact the city's form (see **Figure 6-5**). Like the Action Alternatives in the DEIS, the Preferred Alternative would permit a greater variety of housing types than the No Action Alternative (see **Table 6-2**). The Preferred Alternative allows substantially greater capacity for middle housing types in low density zones, which would make these areas denser. However, middle housing types will be regulated by height and other development regulations as defined by the zone.

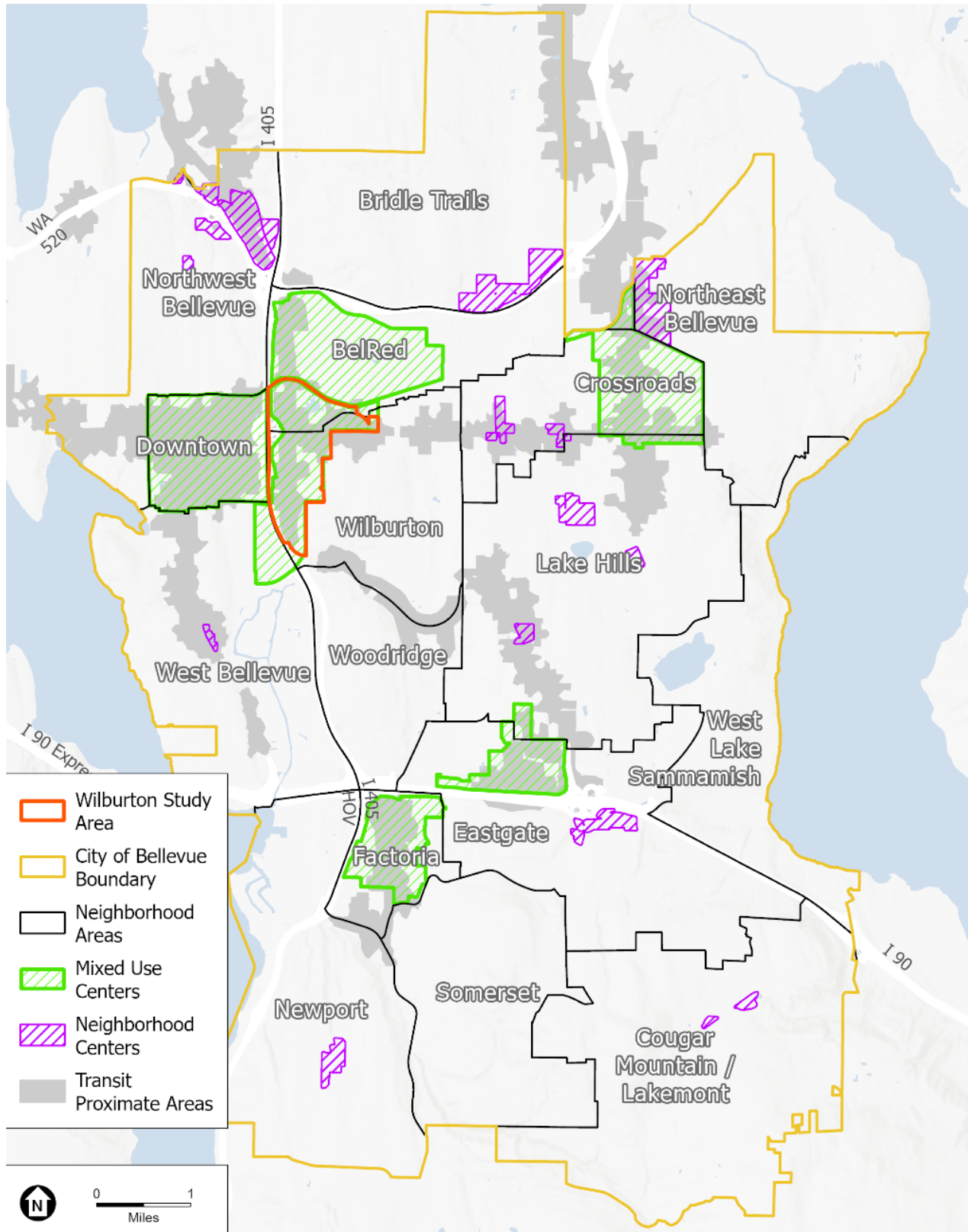
In all alternatives, including the Preferred Alternative, Mixed Use Centers would see a substantial amount of housing, job, and commercial square footage growth. Neighborhood Centers would also experience impacts on urban form, due to more housing units, and different building forms.

Impacts of the Preferred Alternative related to Comprehensive Plan policies UD-6, UD-7, and UD-11 are consistent with the description of the Action Alternatives in DEIS Chapter 6 Section 6.4.2, pages 6-9 and 6-10). Impacts related to Policy UD-48 are most similar to Alternative 3, although there are more opportunities for the creation of active transportation facilities, such as sidewalks, through development in residential areas due to the increased capacity for growth in those areas.

Wilburton Study Area

Impacts of the No Action Alternative and Preferred Alternative related to urban form are consistent with the description of the No Action Alternative and the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, pages 6-10 and 6-11). The Preferred Alternative would have similar opportunities for mixed use areas and commercial space to Alternatives 2 and 3, in alignment with Policy S-WI-2. Impacts related to height transitions are most similar to Alternative 3.

Cross-section diagrams in the Wilburton study area show height transitions. See Figure 6-1 above for the No Action Alternative cross-section and **Figure 6-6** below for the Preferred Alternative cross-section.

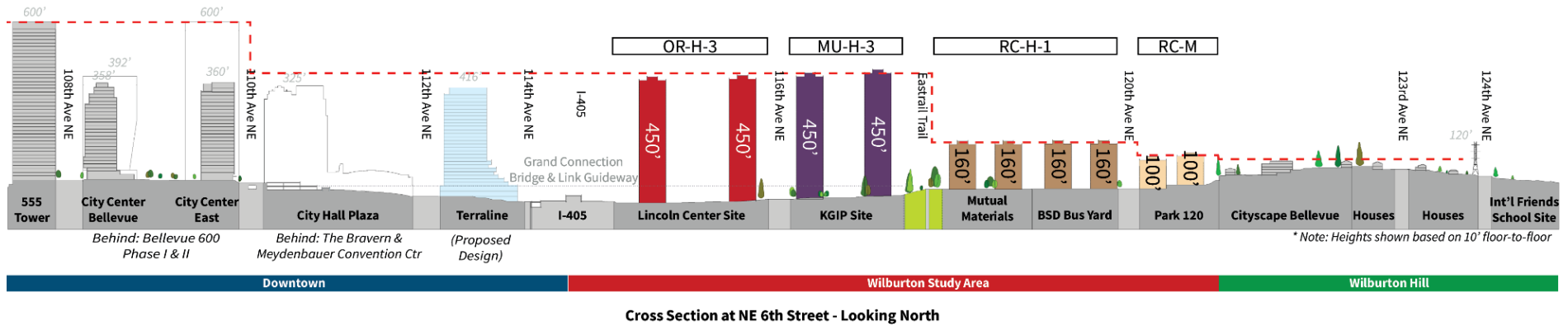


SOURCES: City of Bellevue 2023; BERK 2023

FIGURE 6-5 City of Bellevue Geographies

TABLE 6-2 Impacts on Citywide Urban Form

Geography	Alt 0 (No Action)	Alt 1	Alt 2	Alt 3	Preferred Alternative
Mixed Use Centers	Development within current regulations.	Apartment buildings with larger and two-bedroom units.	Apartment buildings with studios and one-bedroom units.	Larger apartment buildings with studios and one-bedroom units.	Similar to Alternative 3.
Neighborhood Centers	Development within current regulations.	Development within current regulations.	Increased floor area ratio (FAR) allows larger building and greater density. Apartment buildings with studios and one-bedrooms.	Increased FAR allows larger buildings and greater density. Townhomes, small apartment buildings, or similar allowed.	Similar to Alternative 3.
Transit-Proximate Areas	Development within current regulations.	Development within current regulations.	Townhomes, small apartment buildings, or similar allowed.	Townhomes, small apartment buildings, or similar allowed.	Similar to Alternative 3.
Low-Density Neighborhoods	Development within current regulations.	Triplexes, cottage housing or similar allowed.	Duplexes or similar allowed. Some multi-family allowed near transit.	Triplexes, cottage housing, or similar allowed. Some multi-family allowed near transit and employment centers.	Similar to Alternative 3, with additional middle housing types in low density areas.
Wilburton Study Area	Development within current regulations.	Buildings up to around 45 stories adjacent to I-405. Transition to around 10–25 stories in north, south, and east.	More buildings up to around 45 stories adjacent to I-405. Buildings in central node around 16–25 stories. Eastern edge around 10–16 stories.	More buildings up to around 45 stories on both sides of 116th Ave NE. More areas with buildings around 25 and 45 stories compared to other alternatives.	Similar to Alternative 3, buildings up to around 45 stories on both sides of 116th Ave NE. More midrise buildings up to around 7-10 stories east of Eastrail compared to other alternatives.



Preferred Alternative

<ul style="list-style-type: none"> --- General Stepped Transition ■ Proposed Building per Plan Outline of Existing Buildings in Background ■ No Action Allowed Heights 	<ul style="list-style-type: none"> 450' / Up to 45 stories 250' / Up to 25 stories 160' / Up to 16 stories 100' / Up to 10 stories 	<table border="0" style="width: 100%; font-size: small;"> <tr> <td style="width: 33%;">Mixed Use</td> <td style="width: 33%;">Office/Resid</td> <td style="width: 33%;">Resid/Commrc'l</td> </tr> <tr> <td>MU-H-3</td> <td>OR-H-3</td> <td>RC-H-2</td> </tr> <tr> <td>MU-H-2</td> <td>OR-H-2</td> <td>RC-H-1</td> </tr> <tr> <td>MU-H-1</td> <td>OR-H-1</td> <td>RC-M</td> </tr> <tr> <td>MU-M</td> <td>OR-M</td> <td></td> </tr> </table>	Mixed Use	Office/Resid	Resid/Commrc'l	MU-H-3	OR-H-3	RC-H-2	MU-H-2	OR-H-2	RC-H-1	MU-H-1	OR-H-1	RC-M	MU-M	OR-M	
Mixed Use	Office/Resid	Resid/Commrc'l															
MU-H-3	OR-H-3	RC-H-2															
MU-H-2	OR-H-2	RC-H-1															
MU-H-1	OR-H-1	RC-M															
MU-M	OR-M																

* Note: Grayed out colors not used in this alternative

NOTES: Building colors in the Wilburton study area are based on applicable land uses. Buildings represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal. Building stories in the Wilburton study area represent a 10-foot building floor.

FIGURE 6-6 Preferred Alternative: Cross-Section between 110th Avenue NE and 124th Avenue NE at NE 6th Street, looking north

Building rooflines east of I-405 in the Wilburton study area would generally match Downtown buildings along 112th Avenue NE based on current development regulations, before a more significant step down east of Eastrail compared to Alternative 3. A more modest stepdown would occur east of 120th Avenue NE. Rooflines east of 120th Avenue NE would generally be level with buildings east of the study area based on topography. Under the No Action Alternative, in comparison, building heights east of I-405 would be much lower in height than Downtown buildings (see Figure 6-1).

VIEWSHEDS

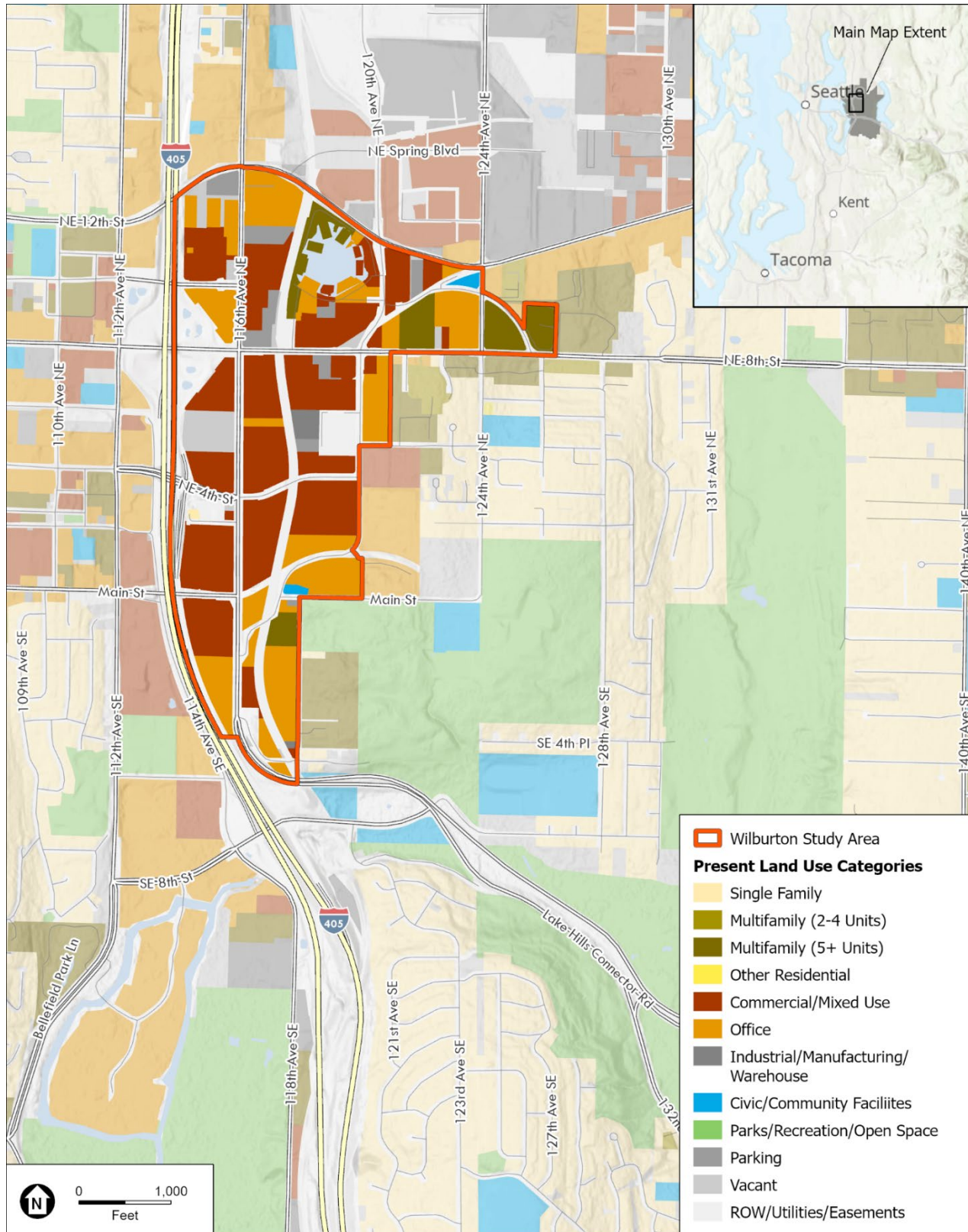
Citywide

Both alternatives would have some impacts on viewsheds because they both expect some level of housing, commercial, square footage, and job growth, which would be reflected in more building massing than in current conditions. Policy and regulatory changes under the Preferred Alternative would allow for more density citywide and taller buildings in some areas. More details on impacts of the No Action Alternative are as described in DEIS Chapter 6 (Section 6.4.2, page 6-13). Impacts of the Preferred Alternative are consistent with the description of the Action Alternatives on DEIS page 6-13.

Wilburton Study Area

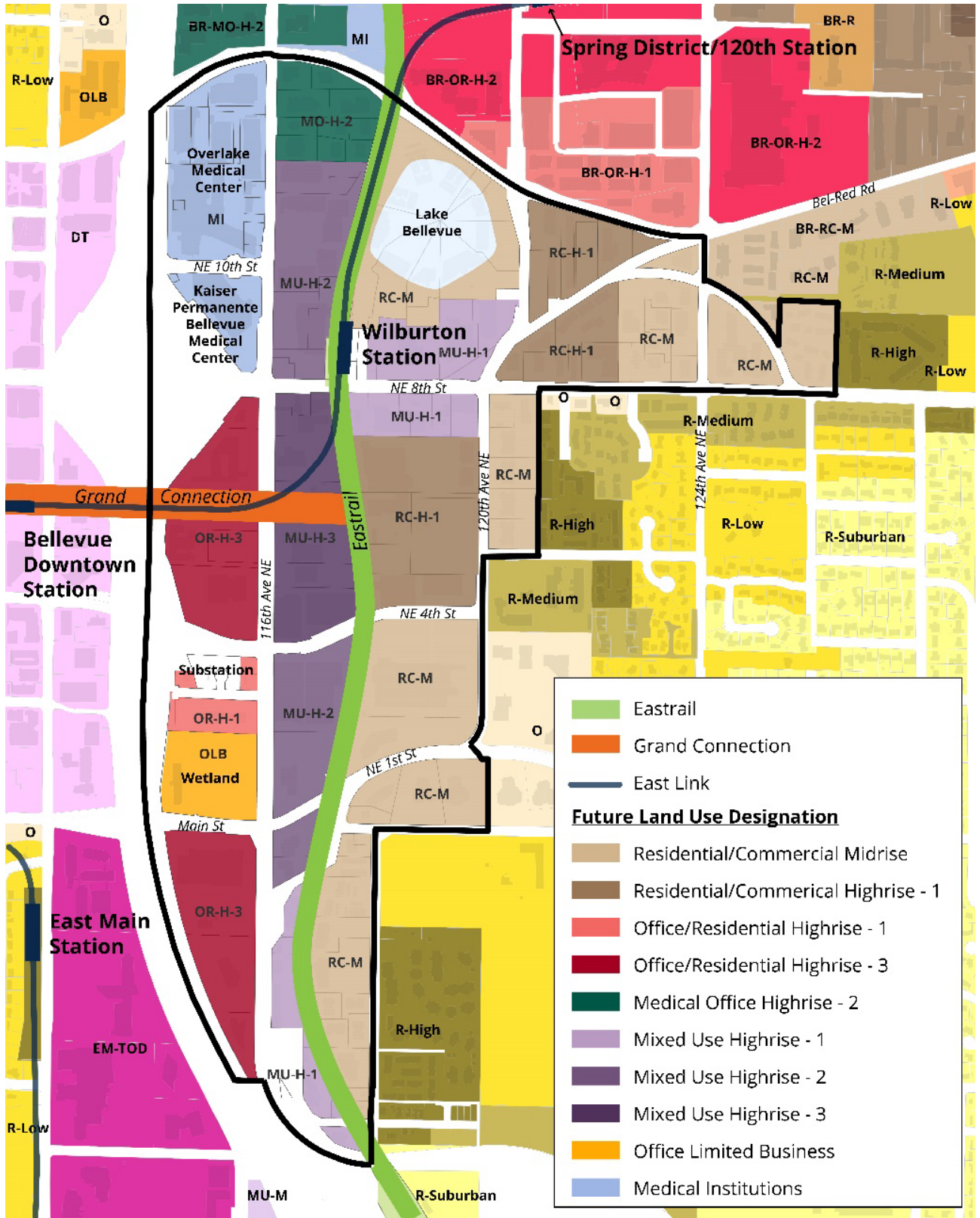
Building heights in the Wilburton study area would be higher under the Preferred Alternative than the No Action Alternative, which is expected to have impacts on views. Further detail on the impacts of the No Action Alternative is described in DEIS Chapter 6 (Section 6.4.2, page 6-13). Impacts of the Preferred Alternative are consistent with the description of the Action Alternatives on DEIS page 6-13. Viewshed analysis specific to the Preferred Alternative follows below.

See DEIS Chapter 6 (pages 6-6 and 6-7) for a description and map of the locations analyzed for view impacts in the Wilburton study area. Note that the colored 3D models represent a theoretical building envelope for each alternative, based on heights and job and housing densities. The models do not reflect any specific building design or site-level development project proposal. The colors represent applicable land uses, as shown in **Figure 6-7** and **Figure 6-8**. The grey buildings represent existing buildings, based on open source building footprint and height data published by ESRI and OpenStreetMap. Modeling of the alternatives does not reflect potential future development outside of the Wilburton study area.



SOURCES: City of Bellevue 2023; King County Assessor 2023; Google Maps 2023; BERK 2023

FIGURE 6-7 Alternative 0 (No Action) Wilburton Study Area



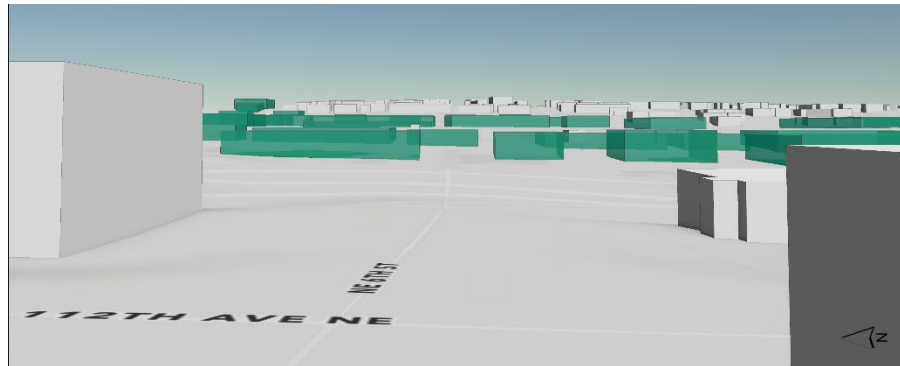
SOURCES: City of Bellevue 2023; King County Assessor 2023; BERK 2023

FIGURE 6-8 Preferred Alternative: Wilburton Study Area

Bellevue Downtown Station (Looking East)

Views of the Bellevue Downtown Station would change dramatically under the Preferred Alternative, like under the Action Alternatives as described in DEIS Chapter 6 (Section 6.4.2, page 6-18). Impacts of the No Action Alternative are expected to be minimal, as described in the DEIS (page 6-18).

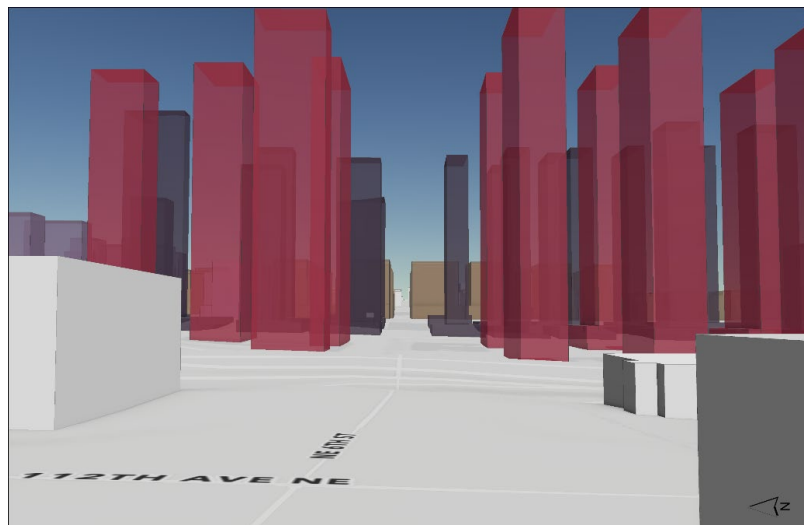
See **Figure 6-9** and **Figure 6-10** for modeled view impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

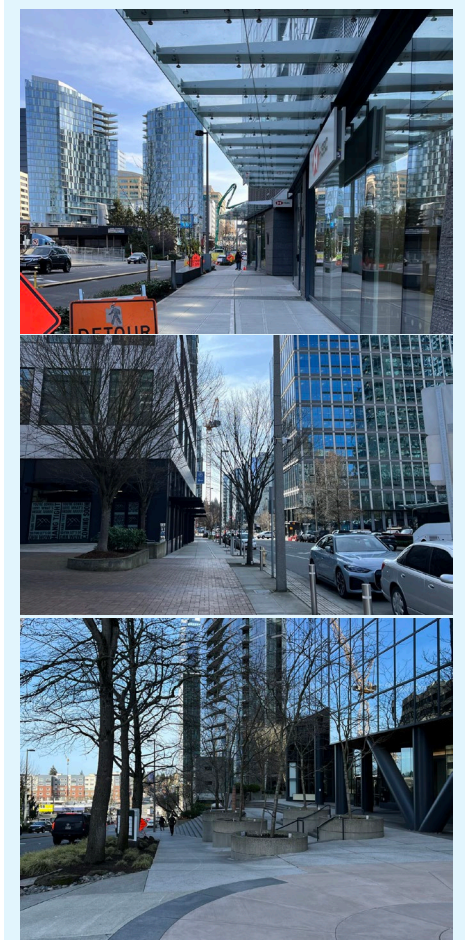
FIGURE 6-9 Alternative 0 (No Action): Bellevue Downtown Station (Looking East)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-10 Preferred Alternative: Bellevue Downtown Station (Looking East)



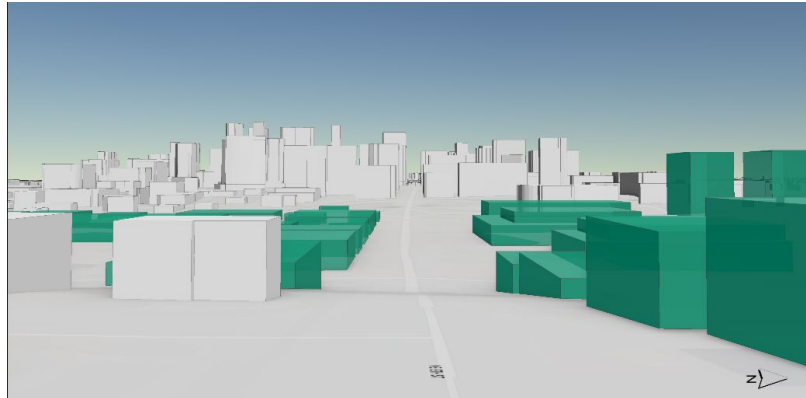
SOURCE: City of Bellevue 2023

Where the alternatives models show capacity for towers, future building design could have visual characteristics similar to the examples above. This could include façade modulation, street trees, variation in textures, plazas, weather protection, transparency, upper-level step backs, and other features that enhance the pedestrian experience and reduce the bulk of buildings.

NE 8th Street (Looking West)

The Preferred Alternative would mostly obstruct this view from street level, similarly to the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-21). Impacts of the No Action Alternative are expected to be minimal, as described in the DEIS (page 6-21).

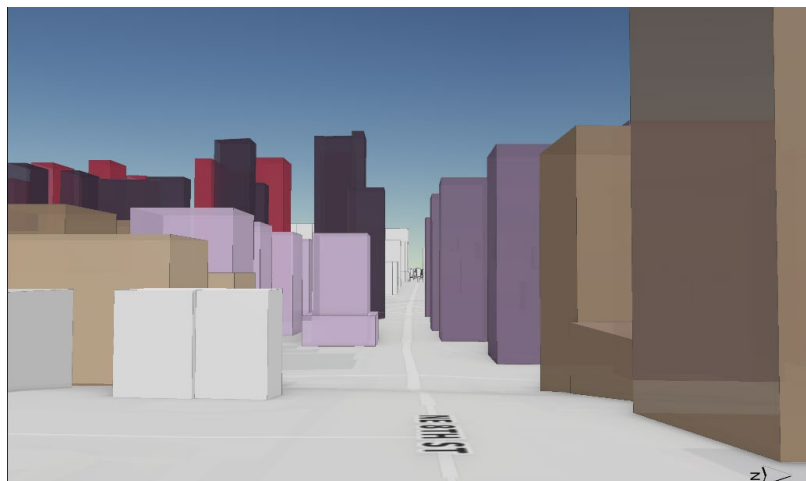
See **Figure 6-11** and **Figure 6-12** for modeled view impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-11 Alternative 0 (No Action): NE 8th Street between 122nd and 123rd Avenues NE (Looking West)



SOURCES: City of Bellevue 2023; BERK 2023

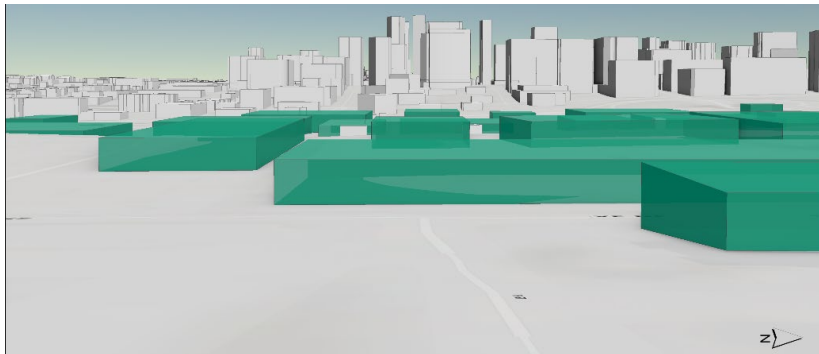
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-12 Preferred Alternative: NE 8th Street between 122nd and 123rd Avenues NE (Looking West)

NE 5th Street (Looking West)

The Preferred Alternative could obstruct the partial view of the Downtown skyline that is currently partially obstructed by mature trees, consistent with the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-23). Impacts of the No Action Alternative are expected to be minimal, as described in the DEIS (page 6-23).

See **Figure 6-13** and **Figure 6-14** for modeled view impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-13 Alternative 0 (No Action): NE 5th Street East of 120th Avenue NE (Looking West)



SOURCES: City of Bellevue 2023; BERK 2023

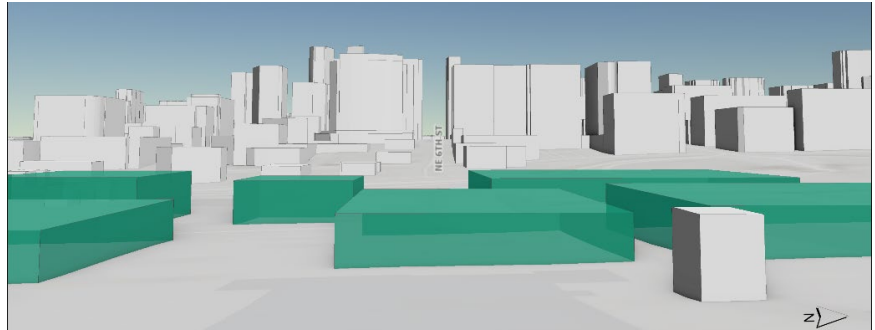
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-14 Preferred Alternative: NE 5th Street East of 120th Avenue NE (Looking West)

Eastrail and NE 6th Street (Looking West)

Conditions under the Preferred Alternative could partially obstruct the existing views of Downtown Bellevue, consistent with the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-26). Impacts of the No Action Alternative are expected to be minimal, as described in the DEIS (page 6-26).

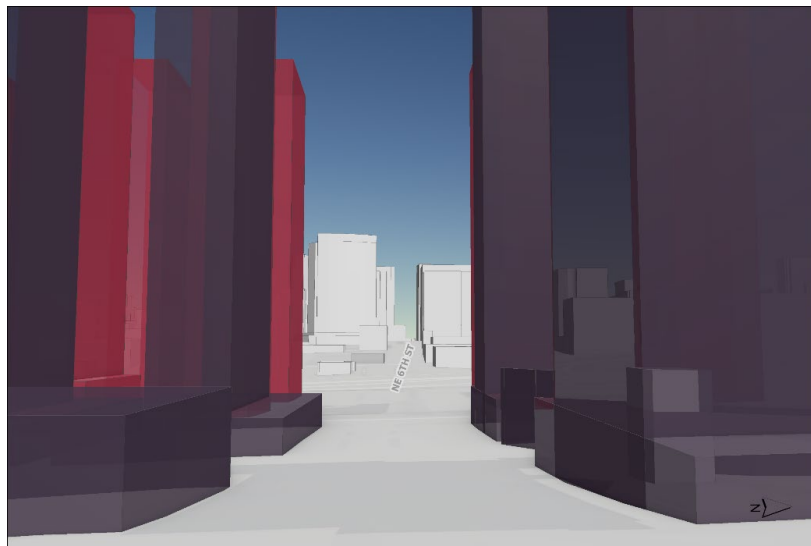
See **Figure 6-15** and **Figure 6-16** for modeled view impacts.



SOURCE: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-15 Alternative 0 (No Action): Eastrail and NE 6th Street (Looking West)



SOURCES: City of Bellevue 2023; BERK 2023

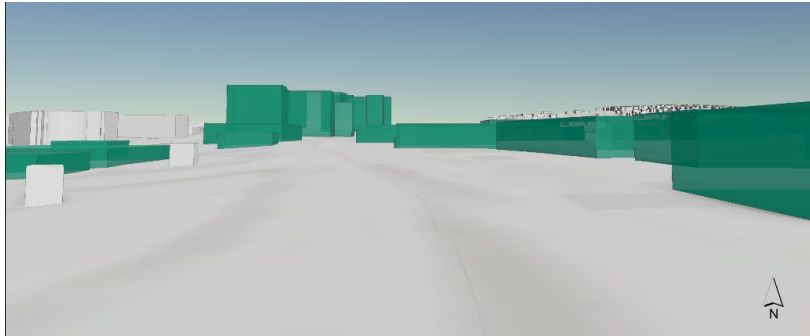
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-16 Preferred Alternative: Eastrail and NE 6th Street (Looking West)

Eastrail and NE 4th Street (Looking North)

The Preferred Alternative could result in obstructions of views of Downtown Bellevue, consistent with the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-28). The No Action Alternative could also result in obstructed views, as described in the DEIS (page 6-28).

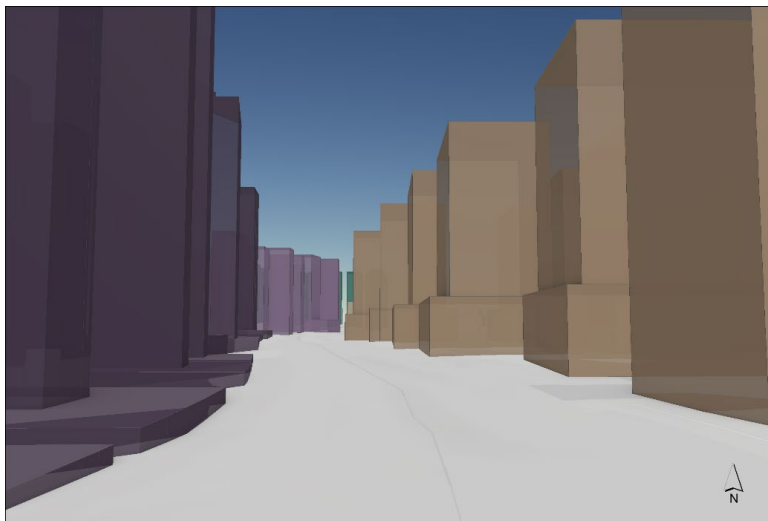
See **Figure 6-17** and **Figure 6-18** for modeled view impacts.



SOURCE: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-17 Alternative 0 (No Action): Eastrail and NE 4th Street (Looking North)



SOURCES: City of Bellevue 2023; BERK 2023

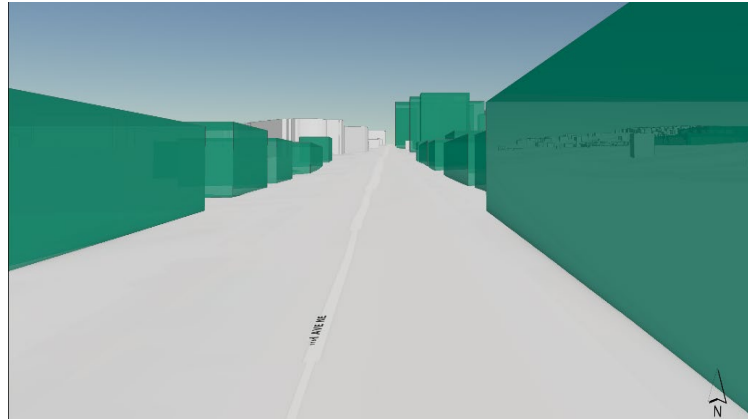
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-18 Preferred Alternative: Eastrail and NE 4th Street (Looking North)

NE 4th Street and 116th Avenue NE (Looking North)

The Preferred Alternative is expected to result in an obstructed view of Downtown Bellevue, consistent with the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-31). The No Action Alternative could also have impacts on this view, as described in the DEIS (page 6-31).

See **Figure 6-19** and **Figure 6-20** for modeled view impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-19 Alternative 0 (No Action): NE 4th Street and 116th Avenue NE (Looking North)



SOURCES: City of Bellevue 2023; BERK 2023

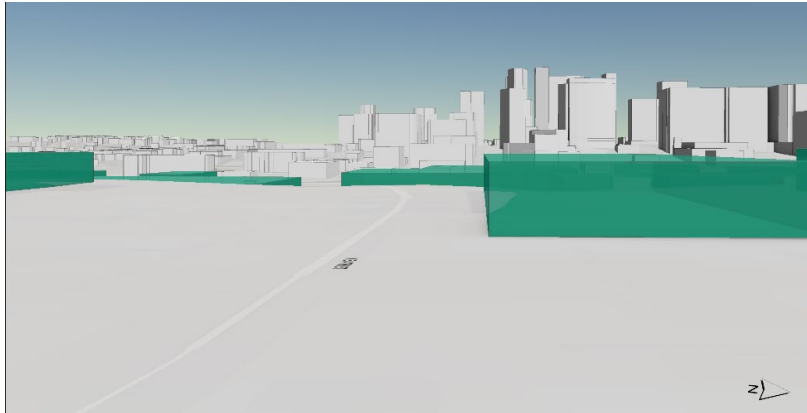
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-20 Preferred Alternative: NE 4th Street and 116th Avenue NE (Looking North)

NE 4th Street and 120th Avenue NE (Looking West)

The Preferred Alternative could mostly obstruct views of Downtown from this location, consistent with the description of the Action Alternatives in DEIS Chapter 6 (Section 6.4.2, page 6-33). Impacts of the No Action Alternative are expected to be minimal, as described in the DEIS (page 6-33).

See **Figure 6-21** and **Figure 6-22** for modeled view impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-21 No Action Alternative: NE 4th Street and 120th Avenue NE (Looking West)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-22 Preferred Alternative: NE 4th Street and 120th Avenue NE (Looking West)

SHADOWS

Citywide

Both alternatives are expected to have shadow impacts greater than current conditions due to growth. This is especially true under the Preferred Alternative, which includes capacity for more growth than the No Action Alternative.

Shadow impacts on parks and public spaces are expected, with greater impacts under the Preferred Alternative. More details on the impacts of the No Action Alternative on key public spaces are as described in DEIS Chapter 6 (Section 6.4.2, pages 6-36 and 6-37). Impacts of the Preferred Alternative are consistent with the description of the Action Alternatives on pages 6-36 and 6-37.

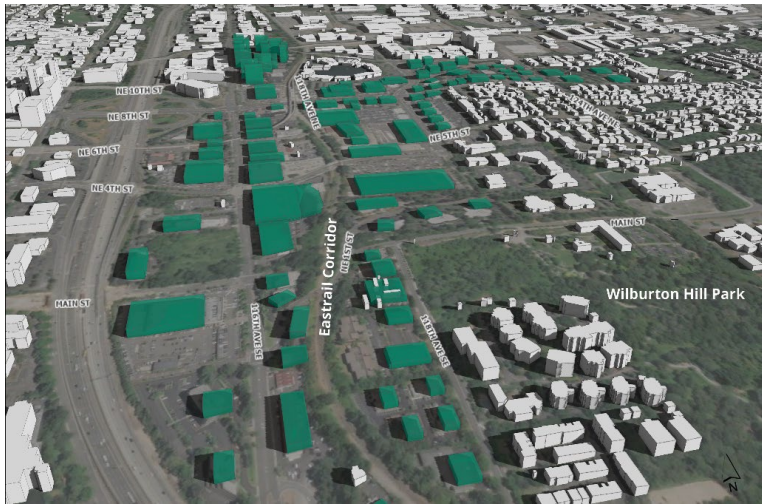
Wilburton Study Area

In the Wilburton study area, areas of focus include two points on the Eastrail and general shadow impacts on residential areas to the east of the study area. Note that the colored 3D models represent a theoretical buildable envelope for each alternative, based on proposed heights and job and housing densities, not a specific building design or development proposal. The colors represent applicable land use types, as shown in Figure 6-7 and Figure 6-8. Grey buildings in the 3D model represent existing buildings; modeling of the alternatives does not reflect potential future development outside of the Wilburton study area.

Eastrail – Near Wilburton Hill Park

This Eastrail segment is expected to be impacted by building shadows in the morning and afternoon under the Preferred Alternative, consistent with the description of Alternatives 2 and 3 on DEIS page 6-37. Impacts of the No Action Alternative are expected to be minimal, as described in DEIS Chapter 6 (Section 6.4.2, page 6-37).

See **Figure 6-23**, **Figure 6-24**, **Figure 6-25**, and **Figure 6-26** for modeled shadow impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

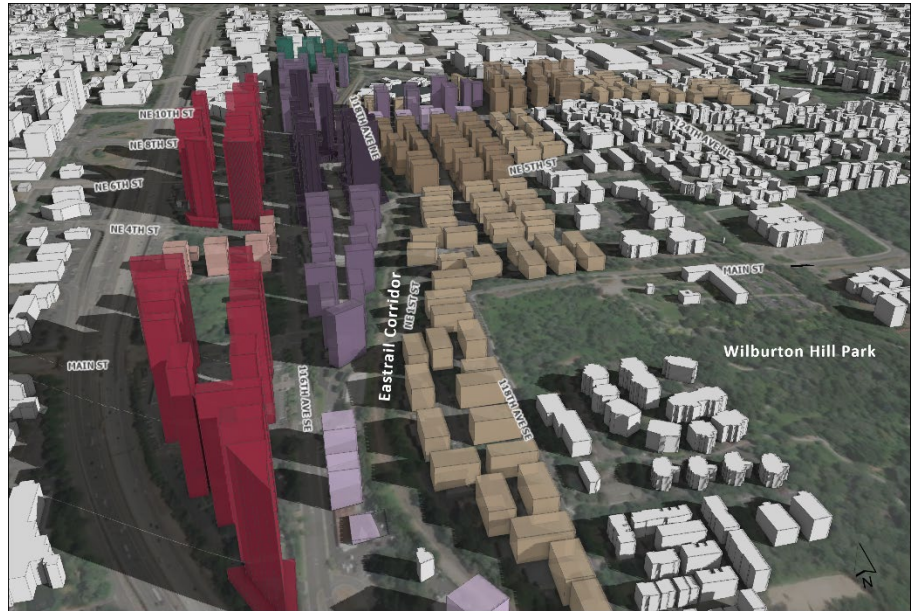
FIGURE 6-23 Alternative 0 (No Action): Eastrail near Wilburton Hill Park (10 a.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

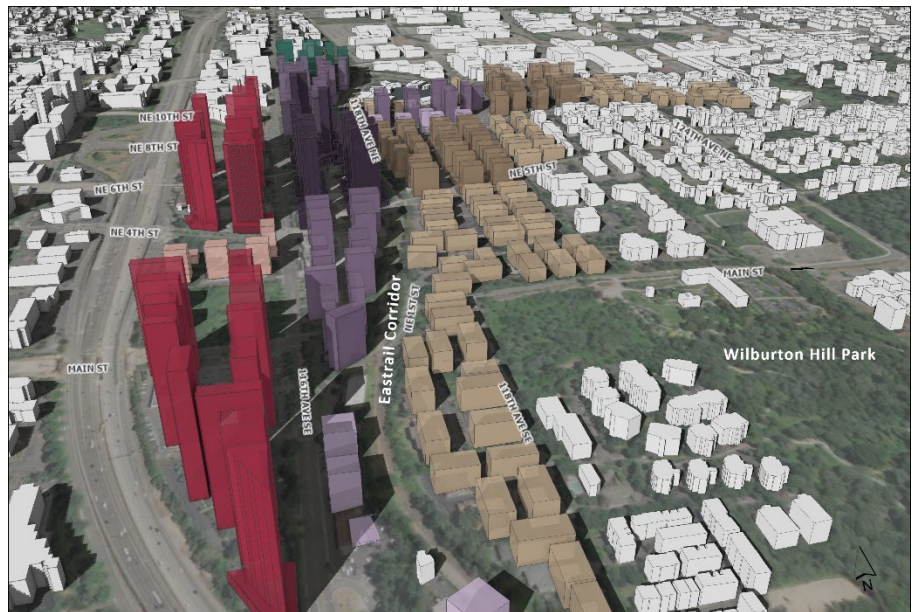
FIGURE 6-24 Alternative 0 (No Action): Eastrail near Wilburton Hill Park (3 p.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-25 Preferred Alternative: Eastrail near Wilburton Hill Park (10 a.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

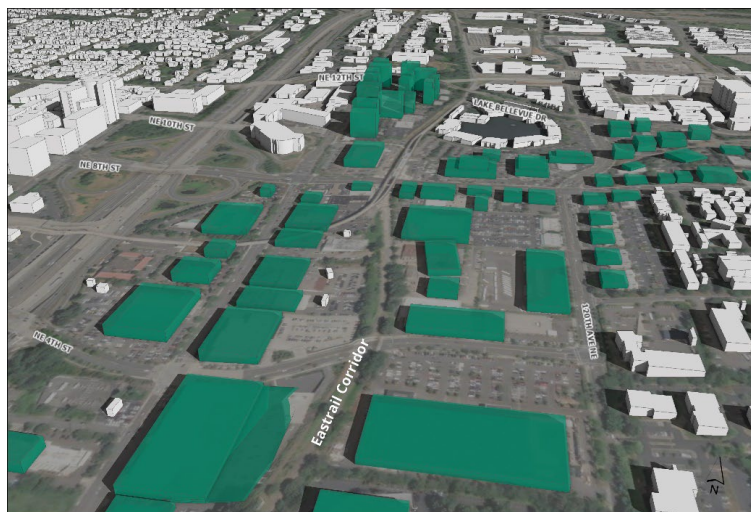
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-26 Preferred Alternative: Eastrail near Wilburton Hill Park (3 p.m., September 21)

Eastrail – Near Residential Development

The portion of Eastrail near NE 4th Street would also see shadow impacts in the Preferred Alternative, consistent with the description of the Action Alternatives, specifically Alternatives 2 and 3, on DEIS page 6-43. Impacts of the No Action Alternative are expected to be minimal, as described in DEIS Chapter 6 (Section 6.4.2, page 6-43).

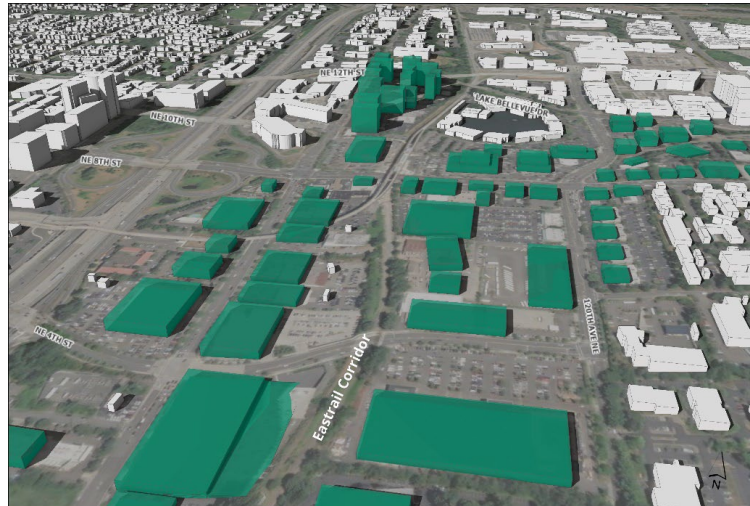
See **Figure 6-27**, **Figure 6-28**, **Figure 6-29**, and **Figure 6-30** for modeled shadow impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

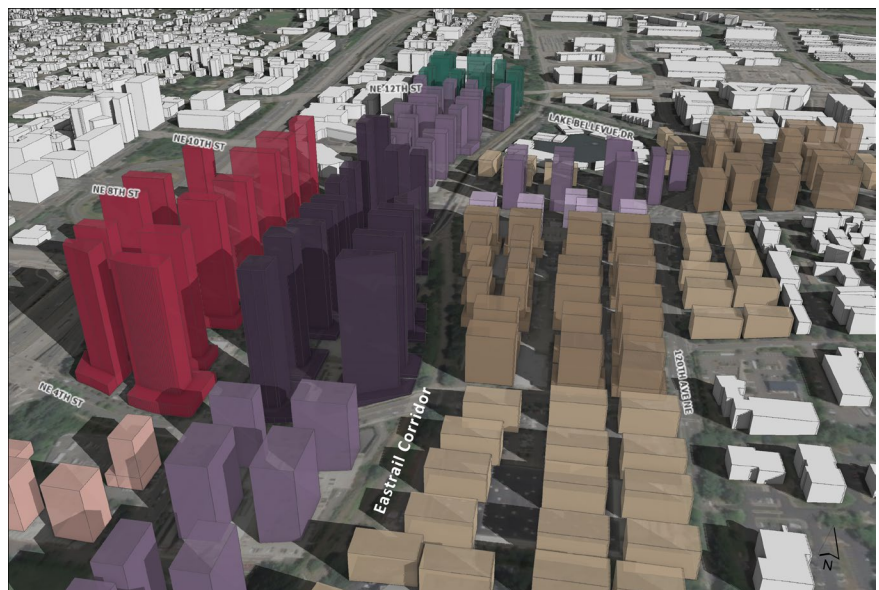
FIGURE 6-27 Alternative 0 (No Action): Eastrail near Residential Development (10 a.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

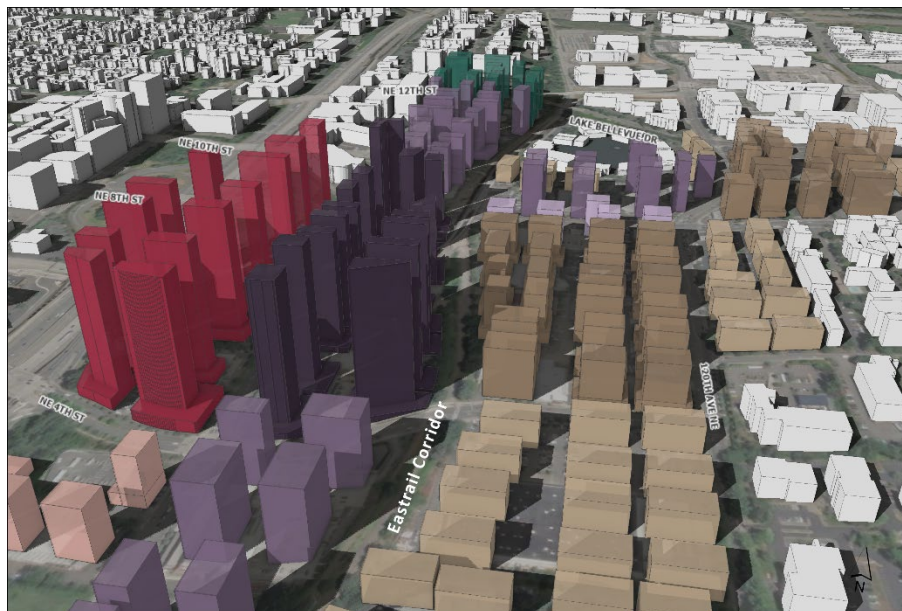
FIGURE 6-28 Alternative 0 (No Action): Eastrail near Residential Development (3 p.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-29 Preferred Alternative: Eastrail and Residential Development (10 a.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

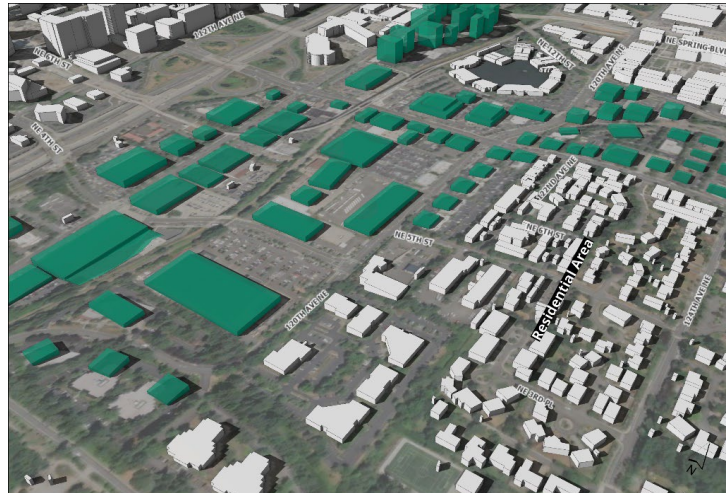
NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-30 Preferred Alternative: Eastrail and Residential Development (3 p.m., September 21)

Residential Area to the East

The Preferred Alternative is expected to have afternoon shadow impacts on existing multi-family residential buildings between 120th Avenue NE and 122nd Avenue NE, consistent with the description of the Action Alternatives on DEIS page 6-48 and most similar to the impacts of Alternative 1. Impacts of the No Action Alternative are expected to be minimal, as described in DEIS Chapter 6 (Section 6.4.2, page 6-48).

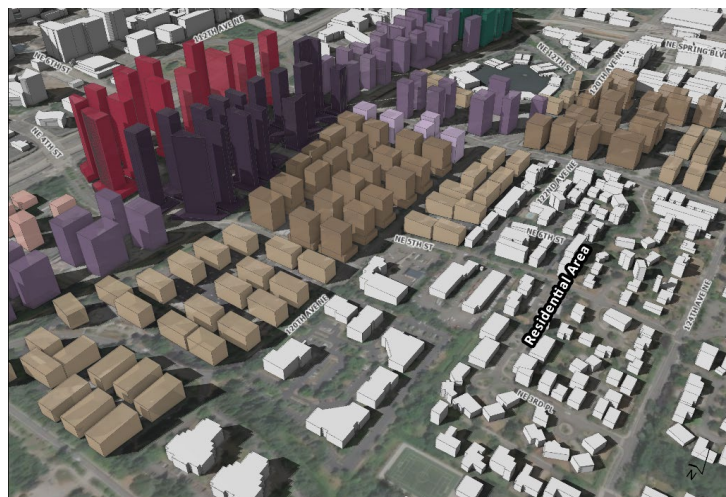
See **Figure 6-31** and **Figure 6-32** for modeled shadow impacts.



SOURCES: City of Bellevue 2023; BERK 2023

NOTES: Buildings in green represent additional capacity for Alternative 0 (No Action). Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-31 Alternative 0 (No Action): Residential Development to the East (3 p.m., September 21)



SOURCES: City of Bellevue 2023; BERK 2023

NOTE: Models represent a theoretical buildable envelope based on proposed heights and job and housing densities, not a specific building design or proposal.

FIGURE 6-32 Preferred Alternative: Residential Development to the East (3 p.m., September 21)

LIGHT AND GLARE

Citywide

Both alternatives are expected to increase light and glare as development is added and more building lighting and vehicle lights are present. This is especially true under the Preferred Alternative, which adds more capacity for growth. Light impacts are likely to be most intense in Downtown and BelRed. Bellevue development patterns are already urban, with existing sources of light and glare, and increases are not expected to impact the public's ability to use and enjoy public spaces. Impacts of the No Action Alternative are described in DEIS Chapter 6 (Section 6.4.2, page 6-51). Impacts of the Preferred Alternative are consistent with the description of the Action Alternatives on page 6-51 of the DEIS.

Wilburton Study Area

The Preferred Alternative is expected to have a greater impact on light and glare than the No Action Alternative, as it adds substantially more capacity. The No Action Alternative does include some amount of development, which would correspond with some light and glare increases. Impacts of the No Action Alternative are as described in DEIS Chapter 6 (Section 6.4.2, page 6-51). Impacts of the Preferred Alternative are consistent with the description of the Action Alternatives on page 6-51.

6.2.2 Impacts of the Preferred Alternative

Impacts of the Preferred Alternative for the city as a whole and the Wilburton study area are as described above under Section 6.2.1, *Comparison of Preferred Alternative and No Action Alternative*.

Generally, the Preferred Alternative is similar to DEIS Alternative 3, but adds substantially more middle housing capacity in low-density areas. Middle housing types will be regulated by height and other development standards as dictated by zoning. Impacts can be mitigated with these and other measures identified in Section 6.3 below.

Overall, the Preferred Alternative is expected to result in greater aesthetic impacts than the No Action Alternative.

6.2.3 Impacts of the No Action Alternative

Impacts of the No Action Alternative for the city as a whole and the Wilburton study area are as described above under Section 6.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and in DEIS Chapter 6 (Section 6.4.3). The No Action Alternative is expected to result in fewer aesthetic impacts than the Preferred Alternative.

6.3 Avoidance, Minimization, and Mitigation Measures

Mitigation measures are the same as those described in DEIS Chapter 6, Section 6.5.3. These include development regulations to restrict the bulk and scale of buildings around public spaces, require ground-level or upper-story setbacks and other form considerations, require streetscape vegetation, apply viewshed regulations, require transparent façades, regulate the scale and form of low-density residential uses, and update regulations for the Wilburton study area.

6.4 Significant Unavoidable Adverse Impacts

In both the No Action Alternative and the Preferred Alternative, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers. The Preferred Alternative would also result in more housing growth in Neighborhood Centers. The urban form of the Wilburton study area, especially under the Preferred Alternative, would change to a much denser area with much taller buildings. This growth will, in turn, have significant adverse impacts from shadows, views, and light and glare. These impacts are to be expected as Bellevue continues to grow, especially in the context of regional transit investments and development interest. **However, with the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.**



CHAPTER 7 Housing

7.1 Updates to the DEIS

This FEIS provides analysis in relation to new Washington State legislation that was enacted in 2023 subsequent to when the DEIS was published. This includes HB 1110, Middle Housing, and HB 1337, Accessory Dwelling Unit. This chapter also incorporates information from the Housing Affordability Study that was prepared by Community Associations Institute (CAI) and is found in Appendix L, *Bellevue Housing Economic Policy Analysis: Phase 1*, and information from the *Bellevue Emergency Housing Land Capacity Analysis*, which is found in Appendix Q of this FEIS.

7.2 Impacts

Impact categories used to identify potential adverse housing impacts of the Preferred Alternative are the same as those used in the DEIS Chapter 7, *Housing*—supply, diversity, and affordability of market-rate housing; displacement risk; and access to transit. The Preferred Alternative would result in a land use impact if:

- **Supply, diversity, and affordability:** The action would result in a decrease to the supply, diversity, or affordability of market-rate housing.
- **Displacement risk:** The action would result in increased risk for involuntary residential displacement as a result of redevelopment in areas at high risk for displacement.

- **Access to transit:** The action would result in a decreased proportion of housing within ¼ mile of the frequent transit network (defined as frequent bus service at least every 15 minutes during the daytime and early evening).

Like DEIS Chapter 7, housing impacts of the Preferred Alternative are considered significant if there is an acute/severe adverse impact within one of the impact categories defined above, or if there are cumulative housing impacts in multiple categories within the Mixed Use Centers, Neighborhood Centers, transit-proximate areas, or Wilburton study area. Transit-proximate areas are based on the 2021 BRT network and do not include future bus or light rail.

Table 7-1 summarizes and compares adverse housing impacts citywide under each of the alternatives.

TABLE 7-1 Summary of Housing Impacts by Alternative, Citywide

Impact Threshold	No Action	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
Supply, Diversity, and Affordability	▼	△	△	△	▼
Displacement Risk	▼	△	△	△	△
Access to Transit	▲	▲	▲	▲	▲

SOURCE: BERK 2023

NOTES: Land use impacts are considered either adverse (▼), moderately adverse (▽), moderately positive (△), or positive (▲).

The residential displacement risk impact threshold in this chapter considers growth in relation to areas identified by the City at high risk at displacement. The displacement risk threshold in Chapter 3, *Land Use*, considers the potential for involuntary residential displacement based on the overall capacity for growth and land use patterns in the city.

7.2.1 Comparison of Preferred Alternative and No Action Alternative

SUPPLY, DIVERSITY, AND AFFORDABILITY

Supply and Diversity

King County’s adopted Countywide Planning Policies (CPPs) establish a housing target of 35,000 units by 2044 for Bellevue. In FEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-1, *Net Capacity for Growth Citywide vs. Adopted Targets (2019–2044), All Alternatives*, summarizes the distribution of capacity for housing and job growth citywide under all alternatives compared to the adopted targets.

Citywide, the housing capacity analyzed under each alternative is higher than the adopted targets. Both the No Action Alternative and

the Preferred Alternative would add capacity over the allocated growth target. These capacity increases and policy changes establish readiness conditions that have the potential to increase housing production and diversity overall.

In FEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-2, *Net Housing Capacity by Location (2019–2044), All Alternatives*, summarizes capacity for new housing and job growth under each alternative by specific location (Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and the Wilburton study area). Housing capacity within each of the specific locations is generally lowest under the No Action Alternative and highest under the Preferred Alternative. New housing capacity in the low-density residential areas under the Preferred Alternative is significantly higher than any of the other alternatives. In addition, the Preferred Alternative shifts a lower share of housing to the Mixed Use Centers than the No Action Alternative (with a corresponding increase in the proportion of housing in low-density residential areas under the Preferred Alternative).

Capacity for new housing in low-density residential areas would be significantly higher under the Preferred Alternative than any of the other studied alternatives (including the No Action Alternative) as a result of additional changes to incorporate capacity created under HB 1110 and HB 1337. Areas currently zoned for low-density residential would have capacity for approximately 72,200 new housing units under the Preferred Alternative compared to 3,700 under the No Action Alternative and between 4,500 and 14,600 under the other Action Alternatives. This increase in housing in the low-density areas has more potential to increase the diversity of housing in low-density residential areas than any of the other alternatives. New development in the low-density residential areas can include new housing types including new middle housing such as duplexes, triplexes, and townhomes.

The No Action Alternative does not meet other new planning requirements for affordable housing across income bands or a range of housing types and so **an adverse impact to supply, diversity is expected under the No Action Alternative. The Preferred Alternative, like the other Action Alternatives, would provide adequate capacity citywide, and have higher potential to provide a range of housing types, so no adverse housing impacts related to supply, and diversity are anticipated.**

Affordability

Citywide, the number of housing units affordable at any income level does not match the number of households with said income.

Analysis in the Housing Needs Assessment shows that Bellevue has a deficit in the number of units affordable to households in the 30 to 50 percent AMI and <30 percent AMI income groups.

City analysis of housing capacity (included as Appendix L) for the alternatives found that there is *capacity* under the Preferred Alternative for affordable housing in all income groups. The analysis in Appendix Q found that the city's combined capacity for all emergency housing types (transient emergency housing, which is currently regulated in the city as a Homeless Services Use, and non-transient emergency housing, which is regulated as Supportive Housing)(Housing Services and Supportive Housing) exceeds the allocated need. This is largely due to the relatively high capacity for Supportive Housing types across city Land Use Districts. City regulations, however, do not allow transient emergency housing in the same locations as non-transient emergency housing.

Further, and subsequent to publication of the DEIS, the housing-related amendments to the King County Countywide Planning Policies were ratified. These CPP amendments were analyzed in the DEIS and are further discussed in Chapter 4, *Plans and Policies*, of this FEIS. Consistent with the CPP amendments, City analysis of housing capacity (included as Appendix L) for the Alternatives found that there is capacity under the Preferred Alternative for affordable housing in all income groups. See **Table 7-2**, excerpted from the City analysis. Refer to Appendix L, Appendix Q, *Bellevue Emergency Housing Land Capacity Analysis*, and Appendix R, *Bellevue Affordable Housing Capacity Analysis, Technical Report*, for more-detailed information on housing and these findings.

TABLE 7-2 Need and Capacity Comparison

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	Low density and High-rise density	3,853	3,930	77
>120%	3,853				
Total	35,000				

NOTES: PSH = Permanent Supportive Housing

The City of Bellevue estimated residential land capacity in the development of a Preferred Alternative to be studied in the EIS for the Comprehensive Plan Periodic Update. That estimate, however, does not account for any “local market forces.” To account for that, the City applied a market factor of 25 percent to most zoning categories. However, for moderate-density capacity resulting from HB 1110 and low-rise capacity resulting from density bonuses allowed on single-family properties owned by religious organizations, the City applied market factors of 50 percent.

Both the No Action Alternative and the Preferred Alternative anticipate increasing the amount of affordable housing, yet their approaches differ. Bellevue would continue to offer incentives for development of affordable housing under both alternatives. Many incentives are available to developers of multi-family projects—including density bonuses, minimum parking reductions, and property tax exemptions. The Preferred Alternative would integrate additional affordability strategies. Refer to Appendix L for an evaluation of the different strategies under consideration. Studies have shown that mandatory inclusionary housing programs can be more effective at creating a larger supply of affordable housing than voluntary programs. Specific elements of program design and market factors will influence the effect of these programs in Bellevue.

The No Action Alternative continues existing incentives for affordable housing in Downtown and BelRed. In addition, programs such as the multi-family tax exemption (MFTE) will continue, and this can increase affordable housing. However, most new market-rate housing tends to be constructed for residents at or above median income levels. Recent trends suggest that existing strategies may not be sufficient to address affordability across the income spectrum. The City of Bellevue has produced more units on average than the net need within the 51–80 percent of AMI category. The city will likely

need to develop and implement targeted strategies and potential funding sources to encourage the construction of affordable housing for extremely low-income (0–30 percent AMI) and very low-income (31–50 percent AMI) households.

Capacity for new housing in low-density residential areas would be significantly higher under the Preferred Alternative than any of the other studied alternatives (including the No Action Alternative). This addition has the potential to increase affordability through the development of multi-unit homes in previously single-unit lots. There is, however, considerable uncertainty since many factors determine the potential for additional development and affordability. These include physical and financial feasibility of individual parcels, individual property-owner decisions, and the specifics of the neighborhood that affect housing sub-markets. Funding gaps and limitations for affordable housing production for households below 80 percent AMI and any unknown barriers to housing development from the market mean that affordable housing production in response to the policy changes remains uncertain.

While both the Preferred Alternative and the No Action Alternative have the potential to increase affordable housing, this potential may be lowest in the No Action Alternative as a result of its lower overall capacity for housing growth and the absence of additional strategies over existing ones to increase affordability. Additionally, the No Action Alternative constrains the capacity for development of a diversity of housing types, leading to further housing price increases.

While the Preferred Alternative has a higher potential than the No Action Alternative to address affordability given the capacity increases anticipated as part of it, without targeted strategies for affordability, it has the potential to have significant adverse impacts on housing affordability. This is anticipated for special needs housing as well, primarily for transient emergency housing which, unlike non-transient emergency housing, is regulated as a Homeless Services Use in the city. **Given this, significant adverse impacts are expected for affordability under both the No Action Alternative and the Preferred Alternative. Impacts may be lower in the Preferred Alternative compared to the No Action Alternative.**

Wilburton Study Area

The Preferred Alternative would add significant capacity in the **Wilburton study area** compared to the No Action Alternative, with an estimated capacity for an additional 14,800 housing units. This is approximately 14,600 housing units above the No Action Alternative.

Capacity for new housing units is just above Alternative 3. The potential for increase in housing supply and housing type diversity is highest in the Preferred Alternative. **No adverse impacts on supply or diversity are anticipated for the No Action Alternative or the Preferred Alternative.**

Housing in new high-rise buildings may be more likely in the Preferred Alternative compared to the No Action Alternative. The high cost of construction for new high-rise buildings makes it unlikely that housing in these buildings will be affordable unless specific strategies are in place to ensure affordability.

Significant adverse impacts on housing affordability in the Wilburton study area are expected under the No Action Alternative and the Preferred Alternative. See DEIS Section 7.3.2, *Impacts Common to All Alternatives*.

DISPLACEMENT RISK

Both the No Action Alternative and the Preferred Alternative provide capacity for housing and include some amount of new development or redevelopment. As future development occurs, some residents may be displaced through redevelopment or as building conditions deteriorate (physical displacement), or priced out as land prices and rents increase (economic displacement). Impacts of development in areas at high risk of displacement can be mitigated through robust anti-displacement strategies focused on these areas and citywide. The addition of housing capacity in areas at high risk of displacement is generally lowest under the No Action Alternative and under the Preferred Alternative.

However, limited redevelopment under the No Action Alternative could push land costs and rents higher than with the Preferred Alternative. The lower supply overall of new housing units under the No Action Alternative also means fewer units could take advantage of current affordability incentives. Housing typologies, including potential homeownership opportunities, would also continue to be limited in single-family areas, although pressure to convert homes with lower intensity typologies could be lower as fewer typologies would be allowed in these areas. The potential for economic displacement is therefore highest under the No Action Alternative.

Citywide, a significant adverse impact on displacement risk is expected under the No Action Alternative. No significant adverse impact is anticipated under the Preferred Alternative.

This would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*.

Wilburton Study Area

No adverse impacts for displacement risk in the Wilburton study area are expected under the No Action and Preferred Alternative and would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*, and DEIS Section 7.3.4, *Impacts of Alternative 1*. As discussed in the DEIS, very little housing displacement is anticipated in areas at high risk of displacement under the No Action or Preferred Alternative in the Wilburton study area.

ACCESS TO TRANSIT

The No Action Alternative and Preferred Alternative would increase housing capacity in transit-proximate areas of the city. Given this, no significant adverse impacts on access to transit are expected.

Wilburton Study Area

All alternatives provide capacity for new housing in transit-proximate areas of the Wilburton study area. Future housing development under all alternatives in the Wilburton study area would not likely decrease the proportion of housing within ¼ mile of the frequent transit network compared to existing conditions. No significant adverse impacts are expected.

Net impacts citywide and in the Wilburton study area regarding access to transit are expected to be positive under both the No Action and the Preferred Alternative and would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*.

7.2.2 Preferred Alternative

SUPPLY, DIVERSITY, AND AFFORDABILITY

As described above under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **no adverse impacts related to supply and diversity are expected under the Preferred Alternative**. Capacity for new housing is highest under the Preferred Alternative (152,000 new units). See FEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-1. **Significant adverse impacts on affordability are anticipated under the Preferred Alternative**.

In FEIS Chapter 3, *Land Use Patterns and Urban Form*, Figure 3-2 and Figure 3-3, *Net Job Capacity by Location (2019–2044), All Alternatives*, compare housing and job capacity, respectively, by location under the Preferred Alternative. Housing supply, diversity, and affordability impacts in the **Mixed Use Centers, Neighborhood Centers, transit-proximate areas, and Wilburton study area** would be similar to those described under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and under DEIS Section 3.3.5, *Impacts of Alternative 2*, and DEIS Section 3.3.6, *Impacts of Alternative 3*.

Like Alternatives 2 and 3, the intensity and mix of uses in and around most **Neighborhood Centers** would shift as infill development and redevelopment occur to reflect a more mixed use or higher-density development pattern. Infill housing and mixed use with 2 to 4 stories would be allowed within the Neighborhood Centers, with middle housing types allowed in the surrounding areas (see Appendix L). Three retail-focused **Neighborhood Centers** (Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village Shopping Center) would also allow slightly more housing density in low- to mid-rise buildings under the Preferred Alternative than Alternative 2 or 3—these centers currently consist of primarily smaller-scale retail with some office uses and would likely shift to include more mixed use or residential uses over time. Housing impacts within the Neighborhood Centers would be similar to those described under DEIS Section 7.3.5, *Impacts of Alternative 2*, and DEIS Section 7.3.6, *Impacts of Alternative 3*.

As described above, significant housing capacity would be added to **low-density residential areas** under the Preferred Alternative as a result of changes to incorporate capacity created under HB 1110 and HB 1337. Housing supply, diversity and affordability impacts in these areas are described under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*.

Wilburton Study Area

The Preferred Alternative would add significant capacity in the Wilburton study area, with an estimated capacity for an additional 14,800 housing units. Capacity for new housing units is just above Alternative 3. The potential for increase in housing supply and housing type diversity is highest in the Preferred Alternative. **No adverse impacts on supply or diversity are anticipated for the Preferred Alternative.**

Housing in new, high-rise buildings may be more likely in the Preferred Alternative. The high cost of construction for new high-rise buildings makes it unlikely that housing in these buildings will be affordable unless specific strategies are in place to ensure affordability.

Given the capacity increase under the Preferred Alternative, **significant adverse impacts on affordability are anticipated under the Preferred Alternative.**

GROWTH IN AREAS AT HIGH RISK OF DISPLACEMENT

As described above under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **no significant adverse impacts on displacement risk are expected under the Preferred Alternative citywide** and would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*, and under DEIS Section 7.3.6, *Impacts of Alternative 3*.

Wilburton Study Area

No adverse impacts on displacement risk in the Wilburton study area are expected under the Preferred Alternative and would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*, and under DEIS Section 7.3.4, *Impacts of Alternative 1*.

ACCESS TO TRANSIT

As described above under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*, **net effects citywide and in the Wilburton study area regarding access to transit are expected to be positive under the Preferred Alternative** and would be similar to those described under DEIS Section 7.3.2, *Impacts Common to All Alternatives*, and under DEIS Section 7.3.6, *Impacts of Alternative 3*.

7.2.3 No Action Alternative

Impacts of the No Action Alternative for the city as a whole and the Wilburton study area are described above under Section 7.2.1, *Comparison of Preferred Alternative and No Action Alternative*, and in DEIS Section 7.3.3, *Impacts of Alternative 0 (No Action)*.

7.3 Avoidance, Minimization, and Mitigation Measures

Mitigation measures include those described in DEIS Section 3.4, *Avoidance, Minimization, and Mitigation Measures*. These include existing regulations and commitments as well as incorporated plan features. The Preferred Alternative also includes significant additional capacity for new housing in **low-density residential areas** as a result of additional changes to incorporate capacity created under HB 1110 and HB 1337. Significant adverse impacts on affordability are anticipated under the Preferred Alternative. These impacts can be mitigated through the adoption of targeted affordability strategies, including mandatory inclusionary zoning and targeted funding

7.4 Significant Unavoidable Adverse Impacts

Citywide housing capacity is above the adopted target under all alternatives, including the Preferred Alternative. Increased capacity for housing has the potential to increase supply and diversity. The exact amount and type of housing, and the actual pace and distribution of future housing development, would be influenced in part by the implementation of Comprehensive Plan policies, related regulations, and actions, and by decisions made by individual property owners and developers. This uncertainty is unavoidable but is not considered significant or adverse given the increases in capacity and recent development trends. Incentives for affordability in the No Action Alternative and Preferred Alternative have the potential to increase the affordability of market-rate housing in the city. However, most market-rate housing tends to be constructed for residents at or above median income levels (see Appendix L). Given this, significant adverse impacts on affordability are anticipated under the No Action Alternative and Preferred Alternative. The application of targeted strategies, such as mandatory inclusionary zoning, and funding sources to encourage the construction of affordable housing and address the estimated gap in funding for extremely low-income (0–30 percent AMI) and very low-income (31–50 percent AMI) households can mitigate the affordability impact of the Preferred Alternative. Changes to existing regulations to support transient emergency housing can mitigate impacts from the Preferred Alternative on this type of housing. With the application of these mitigation measures, no significant adverse impacts are anticipated.

The No Action Alternative continues existing regulations, incentives, and programs targeted at affordability. Recent development trends have shown decreases in affordability despite these existing tools. Without additional strategies for affordability, the No Action Alternative will likely have a significant adverse impact on housing affordability compared to the Action Alternatives. Adoption of an Action Alternative (including the Preferred Alternative) with mitigation measures or modifications in the No Action Alternative can mitigate the potential impacts on affordability in this alternative.

All alternatives provide capacity for new housing and include some amount of new development or redevelopment. As future development occurs, some residents may be displaced through redevelopment (physical displacement) or priced out as land prices and rents increase (economic displacement). The lower supply overall of new housing units under the No Action Alternative also means that fewer units could take advantage of current affordability incentives. Housing typologies, including potential homeownership opportunities, would also continue to be limited in single-family areas, although pressure to convert homes with lower intensity typologies could be lower as fewer typologies would be allowed in these areas. **The potential for economic displacement is higher in the No Action Alternative, and significant adverse impacts related to an increased risk for involuntary residential displacement are expected under the No Action Alternative.**

Adverse impacts related to displacement risk under the No Action Alternative can be mitigated by adopting Action Alternatives or modifying the alternative to increase supply in areas at low risk of displacement and adopting robust anti-displacement measures.

No significant adverse impacts related to displacement risk for the Preferred Alternative are anticipated. Displacement risk and displacement are not easy to predict, however, so monitoring of housing development and adaptive management of housing regulations will be important. A robust anti-displacement strategy can also mitigate any unanticipated impacts, including adopting policies to preserve existing affordable housing, inclusionary housing to mitigate the impacts of displacement and supply more affordable housing overall, and additional affordability incentives throughout the city. The city could also consider additional efforts to avoid or mitigate displacement including neighborhood stabilization efforts such as rental assistance programs, foreclosure assistance programs, as well as tenant protection policies. With the application of these

mitigation measures, no adverse impacts are expected for the Action Alternatives, including the Preferred Alternative.

Future growth will likely increase housing in areas in the city with good access to transit, and **no significant adverse unavoidable impacts related to access to transit are expected.**

INTENTIONALLY BLANK



CHAPTER 8 Air Quality

8.1 Updates to the DEIS

The Preferred Alternative is a hybrid of all three Action Alternatives presented in the DEIS with additional changes to incorporate capacity in compliance with HB 1110 and HB 1337. Analysis of the new Preferred Alternative has been added in addition to Alternatives 1, 2, and 3. See Chapter 15, *Corrections and Clarifications*, for corrections and clarifications.

The associated transportation analysis produced revised estimates of vehicle traffic, which, in turn, has been included in the air quality section of the FEIS. The No Action, Action Alternatives, and Preferred Alternatives' thresholds of significance and long-term impact updates are provided herein.

The potential impacts identified for the No Action Alternative and Preferred Alternative include analysis of the “build-out” housing unit capacity and job capacity associated with each alternative. For the No Action Alternative and the Preferred Alternative, these capacities for growth are higher than the overall citywide growth targets of 35,000 new housing units and 70,000 new jobs by 2044. It is not expected that the build-out housing and job capacities would all occur by 2044, but the Final EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the alternatives.

The FEIS analyzes the build -out associated with the Preferred Alternative to determine the impacts on air quality and greenhouse gases (GHGs) within the study area. Predicted traffic volumes for the No Action Alternative have been updated, and these new data were

used to estimate air and GHG emissions for existing conditions, the No Action Alternative, and the Preferred Alternative.

8.2 Impacts

8.2.1 Thresholds of Significance

The following categories were applied to characterize the potential for adverse air quality and GHG impacts in the city:

- Increased capacity for development, including residential uses, proximate to high-volume roadways.
- Potential for exceeding the Department of Ecology's Small Quantity Emission Rate (SQER) for Diesel Particulate Matter (DPM) of 0.52 pound per year relative to the No Action Alternative (WAC 173-460-150).
- Change in GHG emissions relative to the No Action Alternative, as compared to Ecology's draft SEPA GHG reporting threshold of 10,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) (Chapter 173-445 WAC Rulemaking).

Ecology's SQER is a screening metric typically applied to air facilities that require an air permit. Two levels of emissions screening are available: an air toxics de minimis threshold (0.027 pound per year), and the SQER (0.52 pound per year). Typically, with permitting, if the SQER is exceeded, the facility would be required to conduct dispersion modeling to characterize the potential downwind concentrations. These modeled concentrations are then compared against a third threshold, the acceptable source impact level (ASIL). Without the level of detail in the Comprehensive Plan Periodic Update to conduct such modeling, the SQER was selected as an upper bound significance threshold.

Criteria for GHGs rely on Ecology's proposed SEPA threshold for certain industrial facilities of 10,000 MTCO_{2e} per year. The Comprehensive Plan Periodic Update is not applicable to the proposed threshold, but Ecology does not provide other screening metrics, so 10,000 MTCO_{2e} is the best available threshold and has been applied here.

8.2.2 Long-Term Impacts of No Action and Action Alternatives 1, 2, and 3, and the Preferred Alternative

ALTERNATIVE 0 (NO ACTION) AND UPDATES TO ACTION ALTERNATIVES 1, 2, AND 3

The analysis of the housing capacity and job capacity in the No Action Alternative shows daily traffic increasing by roughly 1 million VMT citywide, when compared against a 2019 baseline. Of this VMT increase, 48,389 of those miles are forecast to be associated with diesel-fueled vehicles, as shown in **Table 8-1**. The citywide estimated overall VMT for the baseline year and all of the alternatives are presented in **Table 8-2**.

TABLE 8-1 Diesel VMT and DPM Emissions by Alternative

Alternative	Daily Diesel VMT Increase from Baseline	Annual Diesel VMT Increase from Baseline ^a	DPM2.5 (lb) ^b	Alt. DPM2.5 Increase (lb) ^c
No Action	48,389	15,820,146	358	—
Alternative 1	59,591	19,482,479	440	83
Alternative 2	66,521	21,747,998	492	134
Alternative 3	75,539	24,696,430	558	201
Preferred	102,055	33,365,249	754	397

NOTES:

- a. Annual VMT based on 326.935 equivalent workdays as calculated during the transportation modeling for the Comprehensive Plan. The diesel-specific VMT was calculated based on the county’s geographic GHG forecasting tool (King County 2022a) for 2044.
- b. Emissions rate per VMT in 2044 calculated using the California statewide 2044 forecasted emissions from the diesel on-road fleet. The emissions factor (g/VMT) estimates were produced from the Emission FAcTOr (EMFAC) model, version EMFAC2021 v1.0.2. California fleet turnover to cleaner technology is expected to be more rapid than Washington due to regulations, and thus these estimates are somewhat lower than we might see in Washington.
- c. Increases relative to the No Action Alternative.

Notably, the VMT estimates, and associated transportation modeling, were revised for the No Action Alternative and Action Alternatives 1, 2, and 3 between the publication of the DEIS and the FEIS. Table 8-1 and Table 8-2 also include data for the Preferred Alternative for comparison purposes. The Preferred Alternative is described in more detail in the next section. These revisions estimate higher VMT than used in the DEIS and thereby result in higher emissions across the alternatives that were considered in both documents.

TABLE 8-2 Project VMT and MTCO_{2e} Emissions by Alternative

Alternative	Daily VMT Increase from Baseline	Annual VMT Increase from Baseline ^a	MTCO _{2e} ^b	Alt. MTCO ₂ Increase ^c
No Action	1,012,213	330,927,792	71,034	—
Alternative 1	1,246,538	407,536,934	87,479	16,444
Alternative 2	1,391,492	454,927,339	97,651	26,617
Alternative 3	1,580,140	516,603,006	110,890	39,856
Preferred	2,134,793	697,938,451	149,814	78,780

NOTES:

- a. Annual VMT based on 326.935 equivalent workdays as calculated during the transportation modeling for the Comprehensive Plan.
- b. Emissions rate per VMT in 2044 calculated for Bellevue using the King County's Geographic GHG Wedge Planning Tool Data, accessed 3/28/2023, <https://your.kingcounty.gov/dnrp/climate/documents/2022/puget-sound-regional-emissions-analysis-project-geographic-ghg-wedge-planning-tool-09-2022.xlsx>.
- c. Increases relative to the No Action Alternative.

The associated fleet mix, emissions reduction, and technology implementation due to fuel economy standards, alternative fuels, and other innovations may offset emissions relative to this increase in VMT, but King County's current wedge analysis indicates that current state and federal policies will not meet the county's GHG targets and further local policy developments will be necessary.

The county's wedge analysis captures reductions that would be external to the city's policies and moves the GHG emissions closer to city goals. However, Bellevue will need to enact additional policies to meet the GHG emissions reduction goals by 2050.

Importantly, a small fraction of the increase in housing units (as discussed in FEIS Chapter 5, *Population and Employment*, and Chapter 7, *Housing*) is expected within 500 feet of major roadways. Increases in VMT and increases in housing units near high-volume roadways can lead to increased exposure to a variety of air pollutants, including DPM. From the baseline year to build-out and based on the updated transportation analysis included in this FEIS, the Preferred Alternative is forecast to generate an additional 397 pounds of DPM above the No Action Alternative, as seen in Table 8-1. As previously noted, the No Action Alternative has an increase in DPM emissions when compared to the DEIS. This increase is solely attributable to the revised transportation modeling and associated VMT estimates.

Under the No Action Alternative, the near-road land uses in the Wilburton study area would largely remain medical- and office-based and would not see a large change in the number of potential residents in close proximity to roadways and the associated exposure to criteria air pollutants and toxics.

The region is in attainment for pollutants of concern, and concentrations for those pollutants are trending downward. This alternative is not expected to reverse that trend or cause the National Ambient Air Quality Standards (NAAQS) to be exceeded.

For GHGs, No Action Alternative would result in increased vehicle traffic that would cause emissions to increase linearly with the traffic volumes if vehicle emissions rates are held constant. However, with fleet turnover, scrappage, adoption of new technologies, and increasingly stringent regulations, the increase in VMT is likely to result in GHG growth that is less than linear. The current forecast from the county indicates that an additional 71,034 MTCO_{2e} will be produced under the No Action Alternative, as compared to the baseline year. These results are provided in Table 8-2. The increase in GHG emissions from the DEIS (No Action GHG emissions of 21,138 MTCO_{2e}) is solely attributable to the revisions to VMT produced in the revised transportation modeling.

The built environment will also be a contributor to GHGs and, as with vehicles, new energy regulations and technologies will reduce the GHG emissions intensity from residential, commercial, and industrial entities. King County planning tools indicate that Bellevue, for year 2044, will have reduced emissions by roughly 79 percent from business-as-usual as a result of changes to the state energy code, the Clean Energy Transformation Act, and the Climate Commitment Act (King County 2022b). Bellevue has additional policies in place that will likely further reduce the city's emissions footprint by 2044.

While there are increases in emissions of both DPM and GHGs from the No Action Alternative, the significance criteria for GHG emissions and DPM emissions were generally designed to assess the impacts relative to No Action. The No Action Alternative is not expected to grow residential uses proximate to major roadways. Therefore, because not all significance criteria are met, the No Action Alternative would result in a **less-than-significant impact** on air quality and GHG.

PREFERRED ALTERNATIVE

The Preferred Alternative would continue growth in the Bellevue region that will increase daily VMT. Notably, the Preferred Alternative results in lower VMT per capita due to consolidation of populations near employment and high-capacity transit service. However, looking at the overall VMT indicates a general increase in the GHG footprint for the region under the Preferred Alternative. The VMT metrics presented in Table 8-2 provide the overall VMT increases associated with the Preferred Alternative's housing and job capacities and the increases above the No Action Alternative. Based on the increase in housing and job capacities, the VMT increases with the Preferred Alternative. The associated fleet mix, emissions reduction, and technology implementation due to fuel economy standards, alternative fuels, and other innovations may offset emissions relative to this increase in VMT if transportation climate policies change significantly in the future. However, current forecasts indicate that GHGs will increase above the No Action Alternative, as shown in Table 8-2. These forecast emissions consider the various state and county climate policies that are currently in place.

In comparing the Preferred Alternative's GHG emissions based on housing and job capacity against the GHG significance threshold (10,000 MTCO_{2e}), the Preferred Alternative is identified as exceeding the threshold. It is important to remember that the region is in attainment with air quality pollutants of concern, and those concentrations are trending downward. The Preferred Alternative may not reverse that trend or cause the NAAQS to be exceeded at the citywide level. However, the alternative's increased density of housing units near roadways (discussed further in Chapter 5, *Population and Employment*) may expose more individuals to air pollution. From the context of DPM emissions, the increases in diesel-fueled VMT within the city based on housing and job capacities would increase the DPM emissions at a rate that exceeds a facility-based air toxics emissions significance threshold.

For the Wilburton study area, many of the near-highway land uses would transition to mixed use, often office-residential. This transition has the potential to expose more individuals to near-road air pollution. As noted, the City of Bellevue's recent air quality study (2023) provides information regarding potential exposure to high-volume roadway air pollution as well as a discussion of potential mitigation strategies. The distances to the roadways, along with building height relative to the roadways, are important factors to consider when evaluating the potential for exposure.

This EIS takes a conservative approach with respect to analyzing air quality impacts associated with build-out housing and job capacities under the Preferred Alternative. With the alternative exceeding both the GHG significance threshold and the air quality significance threshold based on these capacities, the planned growth associated with the Preferred Alternative would result in a **potentially significant impact** on air quality and GHGs. Although it is not expected that the build-out housing and job capacities would all occur by 2044, the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the Preferred Alternative.

8.3 Mitigation Measures

8.3.1 Incorporated Plan Features

No features of the Comprehensive Plan Periodic Update are specific to air quality or GHG impact reductions. However, housing density and the development of residential uses near jobs and transit have indirect influences on the region's air quality and GHG emissions.

8.3.2 Construction Mitigation Measures

For temporary impacts during construction, construction site owners and/or operators are required to take reasonable precautions to prevent fugitive dust from becoming airborne (WSDOT 2017). Fugitive dust may become airborne during demolition, material transport, grading, driving of vehicles and machinery on and off the site, and wind events.

Controlling fugitive dust emissions may require some of the following actions:

- Spray exposed soil with water or other suppressant to reduce emissions and deposition of particulate matter.
- Use phased development to keep disturbed areas to a minimum.
- Use wind fencing to reduce disturbance to soils.
- Minimize dust emissions during transport of fill material or soil by wetting down the load, covering the load, or by ensuring adequate freeboard (space from the top of the material to the top of the truck bed) on trucks.
- Promptly clean up spills of transported material on public roads.

- Schedule work to minimize disruption of the existing vehicle traffic on streets.
- Restrict traffic on-site to reduce soil upheaval and the transport of material to roadways.
- Locate construction equipment and truck staging areas away from sensitive receptors as practical and in consideration of potential impacts on other resources.
- Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways.
- Cover dirt, gravel, and debris piles to reduce dust and wind-blown debris.

Emissions of particulate matter, ozone precursors (e.g., volatile organic compounds and nitrogen oxides), sulfur oxides, and carbon monoxide would be minimized whenever reasonable and possible. Since these emissions primarily result from construction equipment, machinery engines would be kept in good mechanical condition to minimize exhaust emissions. Additionally, contractors would be encouraged to reduce idling time of equipment and vehicles and to use newer construction equipment or equipment with add-on emissions controls.

8.3.3 Long-Term Mitigation Measures

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 are provided in the Air Quality and Land Use Planning Report (City of Bellevue 2023). A variety of air and GHG mitigation measures can be implemented to reduce the exposure of residents. Consistent with the analysis provided in the DEIS, the following measures could be applied to the Preferred Alternative to reduce exposure to air pollutants:

- Reduce exposure to traffic by implementing mitigation strategies, including reducing VMT, retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies.
- Reduce vehicle trips and improve vehicle fuel efficiency.
- Apply transit-oriented development to create more walkable communities.

- Limit the development of residential units with land use buffers (e.g., within 500 feet of major roadways in the city) and implement project-specific mitigation measures to limit exposures to emissions sources such as high-capacity roadways. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of freeways.
- Continue to prioritize low-emissions transportation modes through the development of additional bike/walk pathways, rideshare programs, and other travel demand strategies.
- Identify opportunities to use roadside barriers to reduce exposure to air pollution and to provide the related benefit of reduced noise.
- Produce air quality-specific policies that promote a uniform approach to reducing exposures in Bellevue's future developments.
- Use improved urban design to enhance the use of open space and strategic building placement.
- Decking and lids over highways may also reduce exposures by consolidating emissions releases to certain locations or limiting releases in certain areas.
- Promote the use of high-efficiency ventilation filters in buildings within 1,500 feet of high-volume roadways.
- Limit sensitive uses on floors that are at or near roadway level.

As part of Washington's Climate Commitment Act, funds will be allocated to assist highly impacted communities and to support the involvement of cities, community members, and other impacted entities. This program is still in development but seems to share similarities with California's Assembly Bill 617. This program will likely provide additional emphasis and consideration of air quality and GHG emissions mitigation measures for the Wilburton study area.

8.4 Significant Unavoidable Adverse Impacts

The Preferred Alternative would result in **potentially significant unavoidable adverse impacts** on air quality and GHGs because they exceed one or more of the thresholds of significance.

INTENTIONALLY BLANK



CHAPTER 9 Noise

9.1 Updates to the DEIS

The Preferred Alternative for the city as a whole is a hybrid of all of the three Action Alternatives analyzed in the DEIS, with additional changes to incorporate capacity mandated under HB 1110 and HB 1337. Analysis of the new Preferred Alternative has been added in addition to Alternatives 1, 2, and 3. See Chapter 15, *Corrections and Clarifications*, for clarifications and corrections.

The FEIS analyzes the “build-out” associated with the Preferred Alternative to determine the effects on existing and proposed noise-sensitive land uses within the study area. This includes construction, stationary commercial activities, and the resulting increased noise levels associated with increases in traffic.

Predicted traffic volumes for existing conditions, the No Action Alternative, and all Action Alternatives have been updated, and these new data have been used to model roadside noise levels for existing conditions, the No Action Alternative, and all Action Alternatives, including the addition of the Preferred Alternative.

9.2 Impacts

9.2.1 Thresholds of Significance

Thresholds of significance for the noise analysis are the same as described in DEIS Chapter 9, *Noise*:

- Future traffic noise levels of 10 A-weighted decibels (dBA) or more above existing noise levels.
- Expose new residential uses to noise levels in excess of the Noise Abatement Criteria (NAC) (presented in Table 9-2 of the DEIS Chapter 9).
- Short-term construction activities occur outside of the exempt hours of BCC 9.18.020.

9.2.2 Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative

SHORT-TERM IMPACTS

Under Action Alternatives 1, 2, and 3 and the Preferred Alternative, construction would generate temporary noise impacts. Construction activities would be short-term in nature and most activities would occur during daytime working hours. Individual development projects constructed under the Comprehensive Plan Periodic Update would likely not be concentrated in one area at any given time. Typical construction equipment would include dump trucks, cement pumpers, backhoes, excavators, and other heavy equipment. Within Bellevue, construction activities are exempt between the hours of 7 a.m. and 6 p.m. on weekdays and 9 a.m. and 6 p.m. on Saturdays that are not legal holidays. Any construction outside of these hours or on Sundays would require expanded exempt hours and be subject to criteria noted in BCC 9.18.020.C (Noise Exemptions) or would require a noise variance.

Future public parks and plazas have the potential to result in public events that involve amplified sound that could generate noise in excess of the noise limits of BCC 9.18.030. However, operation of sound amplification equipment requires compliance with a permit issued pursuant to BCC 9.18.045A or a conditional use permit issued pursuant to Part 20.30B of the Land Use Code.

LONG-TERM IMPACTS

Noise from Stationary Commercial Operations

Future commercial facilities could use stationary mechanical equipment that, unless properly designed or controlled, could cause community noise levels to exceed the allowable city noise ordinance limits. In addition, future facilities could use outdoor loading docks and outdoor material storage areas that, unless properly designed and controlled, could generate substantial amounts of noise in the surrounding community. Such uses would be subject to the noise limits of BCC 9.18.030. Mitigation measures to reduce these noise impacts to less-than-significant levels are described in Section 9.4, *Mitigation Measures*.

Traffic Noise Increases Associated with the Plan

Table 9-1 provides a high-level summary of potential noise levels from seven freeway segments that would support traffic increases resulting from development under existing conditions, the No Action Alternative, Action Alternatives 1, 2, and 3, and the Preferred Alternative. Receptor locations were modeled at a distance of 150 feet from the center of each highway. As shown in Table 9-1, the existing noise levels adjacent to the freeway segments range from 73 to 77 dBA, and the increases over existing conditions in the alternatives range from zero to 1 dBA. An increase of 1 dBA is not perceptible to the average person and a 3 dBA increase is barely perceptible. Because all increase in noise along all roadway segments would be less than 10 dBA, the impact with respect to transportation noise would be **less than significant** for all alternatives.

Depending on funding sources, a more detailed traffic noise analysis could be conducted for specific receptors and considering NAC criteria, as well as including field measurements to identify existing conditions and potential noise impacts and any necessary mitigation measures.

Because the Grand Connection would cross over I-405, there would be increases in noise by bringing the receiver closer to the interstate; for receivers near the Grand Connection; however, the increase in noise over existing conditions would not be perceptible to the average person.

TABLE 9-1 Existing, No Action, and Future Potential Noise Levels (in dBA)

Highway Segment	Existing Conditions	No Action Alternative		Alternative 1		Alternative 2		Alternative 3		Preferred Alternative	
		Future Noise	Increase over Existing	Future Noise	Increase over Existing	Future Noise	Increase over Existing	Future Noise	Increase over Existing	Future Noise	Increase over Existing
I-405 north of SR 520	77	78	1	78	1	78	1	78	1	78	1
I-405 between SR 520 and I-90	77	77	<1	78	1	78	1	78	1	78	1
I-405 south of I-90	76	76	<1	77	1	77	1	77	1	77	1
SR 520 west of I-405	73	73	<1	74	1	74	1	74	1	74	1
SR 520 east of I-405	74	75	1	75	1	75	1	75	1	75	1
I-90 west of I-405	75	75	<1	76	1	76	1	76	1	76	1
I-90 east of I-405	76	77	1	77	1	77	1	77	1	77	1

SOURCE: Prepared by ESA 2023

Exposure of New Residential Uses to Excessive Traffic Noise Levels

Action Alternatives 1, 2, and 3 and the Preferred Alternative could result in new residential uses proximate to freeways that generate the relatively high noise levels indicated in Table 9-1 at a distance of 150 feet. Given that the NAC for residential uses (in Table 9-2 of DEIS Chapter 9) 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 9-2**. These distances are conservative in that they do not account for intervening structures or topography that would attenuate traffic noise.

TABLE 9-2 No Action, Action Alternatives 1, 2, and 3, and Preferred Alternative Potential Noise Levels (in dBA)

Highway Segment	Distance (feet) to Residential NAC (67 dBA)				
	No Action Alternative	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
I-405 north of SR 520	1,865	1,905	1,915	1,940	1,940
I-405 between SR 520 and I-90	1,775	1,790	1,805	1,825	1,885
I-405 south of I-90	1,380	1,410	1,410	1,435	1,460
SR 520 west of I-405	635	690	700	730	785
SR 520 east of I-405	915	965	990	1,015	1060
I-90 west of I-405	1,110	1,120	1,135	1,160	1,205
I-90 east of I-405	1,440	1,470	1,495	1,505	1,645

As can be seen from Table 9-2, if residential development under the Comprehensive Plan Periodic Update were to occur within 2,000 feet of I-405, 1,200 feet of I-90, or 1,000 feet of SR 520, the noise exposure of these uses would likely approach or exceed the NAC. Mitigation measures to reduce these potential noise impacts to less-than-significant levels are described in Section 9.4, *Mitigation Measures*.

9.2.3 Impacts of Alternative 0 (No Action)

The No Action Alternative would have less capacity for development than the Preferred Alternative. Since this is the No Action Alternative, there would not be any change and, therefore, no construction beyond that allowed by current zoning. Stationary commercial operations would be the same, and there are no other impacts beyond those described above in Section 9.2.2, *Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative*. The No Action Alternative would result in smaller increases in traffic noise compared to Action Alternatives 1, 2, and 3 and the Preferred Alternative. As shown in Table 9-1, noise increases along all roadways would increase by 1 dBA under Action Alternatives 1, 2, and 3 and the Preferred Alternative, unlike the No Action Alternative where four on-freeway segments would increase by less than 1 dBA.

Noise exposure of new noise-sensitive uses would be the same as that allowed by current zoning.

9.2.4 Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative

Construction and stationary commercial operations impacts would be the same as described above in Section 9.2.2, *Impacts of Action Alternatives 1, 2, and 3 and the Preferred Alternative*.

Future noise levels due to increases in traffic under Action Alternatives 1, 2, and 3 and the Preferred Alternative range from 74 to 78 dBA at a distance of 150 feet, with increases above existing levels of 1 dBA along all freeway segments. Unlike the No Action Alternative, noise increases along I-405 between SR 520 and I-90, I-405 south of I-90, SR 520 west of I-405, and I-90 west of I-405 would increase by 1 dBA. Under the Preferred Alternative, development of new noise-sensitive uses in proximity to freeways could expose people to noise levels in excess of the 67 dBA residential NAC.

- All increases in noise along all roadway segments would be less than 10 dBA and the impact with respect to transportation noise increases would be less than significant for all alternatives.
- Residential development under the Comprehensive Plan Periodic Update within 2,000 feet of I-405, 1,200 feet of I-90, or 1,000 feet of SR 520 could result in noise exposure of these uses that would likely approach or exceed the NAC that would be a potentially significant impact.
- Future commercial facilities would use stationary mechanical equipment, outdoor loading docks, or outdoor material storage areas that generate noise in excess of the noise limits of BCC 9.18.030.
- Future public parks and plazas have the potential to result in public events that involve amplified sound that could also generate noise in excess of the noise limits of BCC 9.18.030.

9.3 Mitigation Measures

9.3.1 Incorporated Plan Features

There are no features of the Comprehensive Plan Periodic Update that are specific to noise or noise reduction.

9.3.2 No Action Alternative (Alternative 0)

Alternative 0 (No Action) has capacity for adding 41,000 new housing units. This is above the regional growth target for Bellevue, which is 35,000 new units, but does not meet other new planning requirements, including affordable housing across income bands and a range of housing types. There would be capacity for 124,000 new jobs under this alternative, which is above the regional growth target of 70,000 jobs.¹ Housing capacity within the Wilburton study area would be small (less than 1 percent of the citywide total), and the Wilburton study area would have a modest share of citywide job capacity (5 percent) with no changes to allowed uses or building intensities.

Development of new commercial uses under Alternative 0 (No Action) could result in new noise impacts from mechanical equipment or loading docks that may exceed the City of Bellevue Noise Standards in BCC 9.18.030. Therefore, compliance with the Class B Commercial Maximum Permissible Noise Levels of BCC 9.18.030 would be a required mitigation measure. Methods of achieving these standards include using low-noise-emitting heating, ventilation, and air conditioning (HVAC) equipment, locating HVAC and other mechanical equipment within a rooftop mechanical penthouse, and using shields and parapets to reduce noise levels to adjacent land uses. For commercial loading docks, specific design measures could be implemented that may include but are not limited to shielding from features integrated into site design, and/or restrictions on hours for commercial deliveries within commercial and mixed use areas.

While all of this growth would increase traffic on freeways and local roadways, as discussed above, noise levels on freeways throughout the study area under the No Action Alternative would increase by 1 dBA or less and would therefore be less than significant, and no mitigation measures are required.

¹ Housing and job capacity used in this EIS analysis are higher under the No Action Alternative than the capacity that was reported in King County's 2021 Urban Growth Capacity Report.

9.3.3 Action Alternatives 1, 2, and 3 and the Preferred Alternative

The Preferred Alternative for the city as a whole is a hybrid of all of the three DEIS Action Alternatives with additional changes to incorporate capacity mandated under HB 1110 and HB 1337.

Outside of Mixed Use Centers and Neighborhood Centers, the future land use under the Preferred Alternative remains largely the same, similar to Action Alternative 1. However, the specific criteria for increased housing density as outlined in HB 1110 and HB 1337 have been incorporated into the Preferred Alternative, creating far more capacity for housing across the city than was analyzed in Alternative 1.

Under Action Alternatives 1, 2, and 3 and the Preferred Alternative, development of new noise-sensitive uses in proximity to freeways could expose people to noise levels in excess of the 67 dBA residential NAC. Therefore, construction of new noise-sensitive land uses should either provide a buffer distance commensurate with the distances provided in Table 9-2, or project plans should be reviewed by a qualified acoustical consultant to ensure that appropriate construction upgrades (typically higher rated Sound Transmission Class [STC] values for windows) are specified to ensure compliance with the interior noise standard of 45 dBA, day-night average noise level (L_{dn}).

9.4 Significant Unavoidable Adverse Impacts

Under all alternatives, noise would occur citywide and in the Wilburton study area. Transportation noise impacts would be less than significant, and noise from stationary sources and loading docks associated with commercial uses would be less than significant with mitigation. Therefore, there would be **no significant and unavoidable noise impacts**.



CHAPTER 10 Public Services and Utilities

10.1 Updates to the DEIS

There are no updates to the DEIS analysis related to Public Services and Utilities. Also refer to Chapter 15, *Corrections and Clarifications*, of this FEIS for more information.

10.2 Potential Impacts

10.2.1 Thresholds of Significance

In addition to a general analysis of public services and utility impacts, the following thresholds of significance are included in this chapter:

- Create a reduction in access to parks and open space facilities so that the proposed population is not accommodated.
- Result in inability to accommodate the proposed student population.
- Negatively affects the response times for police and/or fire and emergency medical services identified by the Bellevue Police Department and Bellevue Fire Department.
- Increase demand for special emergency services beyond current operational capabilities of service providers.
- Result in inconsistencies with planned growth and capital plans for the utility system.
- Potentially require major new projects or initiatives for energy system upgrades to accommodate redevelopment.

In addition, each alternative is evaluated using the environmental sustainability performance metrics:

- Qualitative discussion of gaps in sewer infrastructure and where capacity is increasing in combination with the location of septic systems.

10.2.2 Comparison of Preferred Alternative and No Action Alternative

The potential impacts identified for the No Action Alternative and Preferred Alternative include analysis of the “build-out” housing unit capacity and job capacity associated with each alternative. For the No Action Alternative and the Preferred Alternative, these capacities for growth are higher than overall citywide growth targets of 35,000 new housing units and 70,000 new jobs by 2044. It is not expected that the build-out housing and job capacities would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the alternatives.

The No Action Alternative and Preferred Alternative have varying amounts of housing capacity and job capacity, which may increase the need for public services and utilities based on the percentage of increase.

Potential population growth associated with increased housing capacity will increase under each alternative, particularly with the Preferred Alternative with the largest increase.

Potential future population and employment growth will increase the demand for public services including police, fire/ emergency medical technician (EMT), and schools. Incremental growth over the planning period would be addressed during the city’s regular capital planning efforts. Each service provider in conjunction with the city could evaluate levels of service and funding sources to balance with expected growth; if funding falls short, adjustments may be needed to level of service targets or to growth targets as part of regular planning under the GMA.

PUBLIC SERVICES

Police

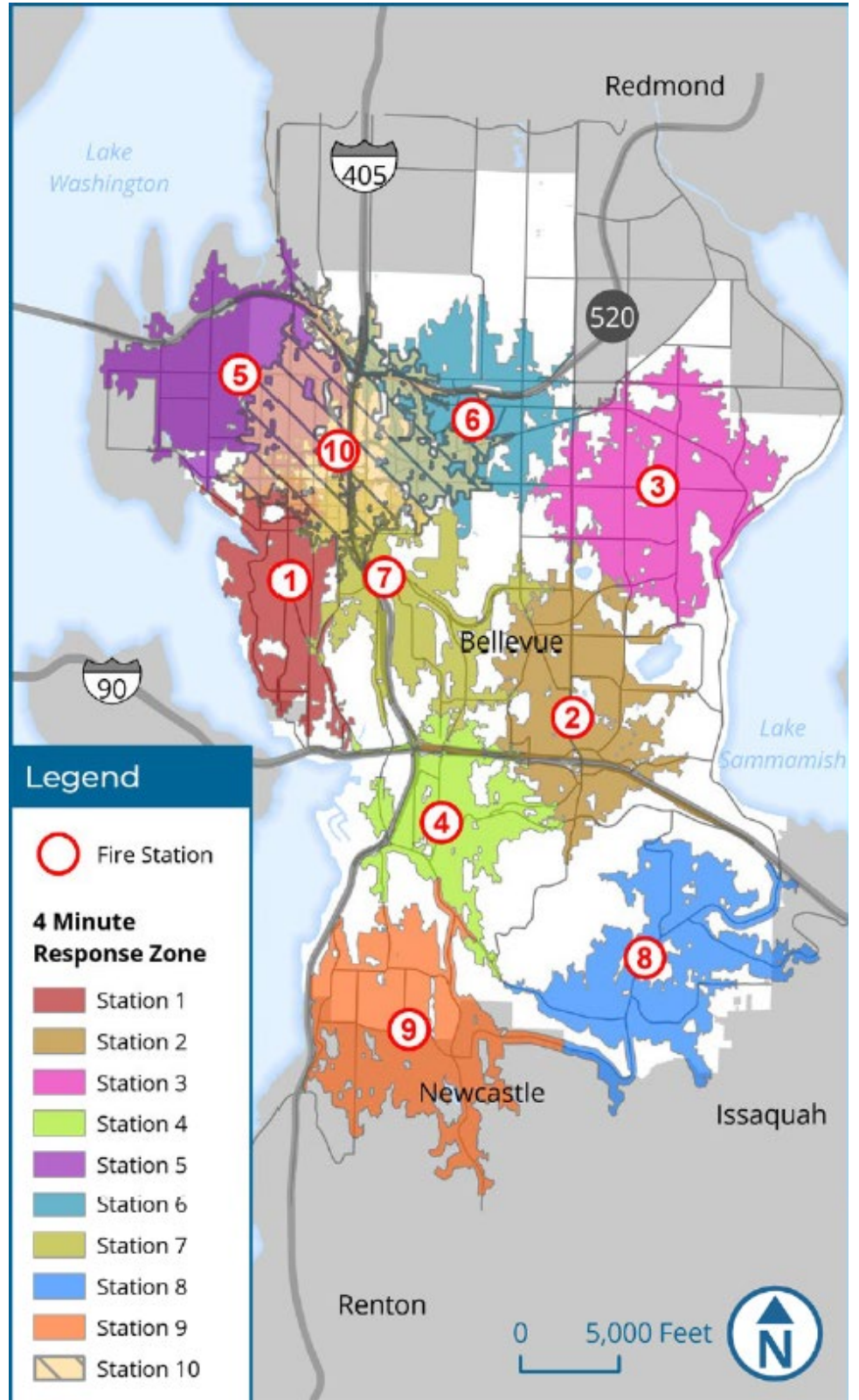
Under both the No Action Alternative and the Preferred Alternative, increases in population and employment in the City of Bellevue could potentially increase calls for police service. In addition to the increases in densities, other factors may influence crime levels as areas grow. Under both the No Action Alternative and the Preferred Alternative, Bellevue would see growth of population and employment, creating more demand for police services while continuing to challenge staff to meet response time targets.

Fire

Increased development under both the No Action Alternative and the Preferred Alternative would likely increase calls for fire service. As the area grows, additional staff, equipment, and potentially new fire stations would be required to maintain current level of service standards. To meet response time requirements as growth occurs, the city may also need to re-evaluate staffing levels and equipment at specific fire stations located closest to areas planned for high levels of growth. As congestion increases, satellite storage for emergency response equipment may be needed.

With the passage of the Fire Facilities Levy in 2016, the City of Bellevue is planning to start construction on the new Fire Station 10. The construction and operation of Station 10 and the proximity to high-rise buildings will help with response times, including vertical response times (time to travel from curbside to location in a high-rise building). The new station will enable the department to effectively access Downtown, BelRed, and the area around the Wilburton Light Rail Station, where greater growth and taller buildings are planned. **Figure 10-1** demonstrates 4-minute response times with the addition of Fire Station 10.

Significant impacts on response times are not expected. The passage of the levy also provides funding to upgrade other stations and facilities to ensure the department can meet the growing demand in services and maintain response times.



SOURCE: Bellevue Fire Department 2022

FIGURE 10-1 Four-Minute Response Zone with Station 10

Parks

As population increases in the city from new development, demand for parks and recreation would increase. The city relies on the Bellevue Comprehensive Plan and the Parks & Open Space System Plan to identify and accommodate gaps in service. The following neighborhood areas are currently identified as having significant gaps in walkable access to parks and trails: BelRed, Bridle Trails, Cougar Mountain/Lakemont, Crossroads, Downtown, Eastgate, Factoria, Newport, Northwest Bellevue, Northeast Bellevue, Somerset, West Lake Sammamish, and Wilburton.

The city would rely on the Parks & Open Space System Plan future updates and funding to accommodate the need for increased population needs for parks and recreation spaces under both the No Action Alternative and the Preferred Alternative. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on parks or recreation in the City of Bellevue or in the Wilburton study area are expected.**

Schools

New residential development may result in additional students. The alternatives have varying amounts of housing capacity and approaches to adding new housing types.

The Bellevue School District, Renton School District, Lake Washington School District, and Issaquah School District will continue to monitor student enrollment and plan for changes by implementing short-term and long-term solutions. The school districts are experiencing lower enrollments. Through school district planning, the schools can accommodate changing student numbers. The school districts currently believe they can accommodate students. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on schools in the City of Bellevue or in the Wilburton study area are expected.**

UTILITIES

Electricity

System Average Interruption Frequency Index (SAIFI) and System Average Interruption Duration Index (SAIDI)

- SAIFI measures the number of outages an average customer experiences in a year.
- SAIDI reflects the amount of outage time an average customer experiences during a year.

New residential development and commercial development may result in additional electrical utility use on a system that already has circuits that exceed customer-minute interruption goals. The reliability of the electrical system is reviewed by assessing the reliability metrics that indicate the performance of the system relative to planned and unplanned outages. Electric system reliability is measured by standard industry metrics of System Average Interruption Frequency Index (SAIFI) and System Average Interruption Duration Index (SAIDI).

Puget Sound Energy (PSE) is a non-city owned utility. PSE has an approved Integrated Resource Plan (IRP) with the Washington Utilities Transportation Commission and coordinates with the city. Their Energize Eastside project is currently under construction and is intended to be able to supply adequate electrical needs to the city as the population grows.

The Comprehensive Plan Periodic Update is a non-project action that will not create significant adverse impacts. Specific projects proposed will need to provide evidence that the city has the provisions for electricity. During project review, the city may determine they do not have enough electricity to provide for larger projects. In that case, they may not be able to accommodate the anticipated new growth under any of the alternatives. If the city is able to respond to additional demand for electricity as part of their planning (as they are doing with Energize Eastside), there should be **no significant adverse impacts on electrical supply in the City of Bellevue or in the Wilburton study area.**

Water

New residential development and commercial development may result in an increase in need for additional water supply.

Both the No Action Alternative and the Preferred Alternative would result in an increase in water demand, although the use of higher efficiency and low-flow fixtures could reduce per-capita demand. The Water System Plan is updated on a 6- to 10-year cycle to address aging infrastructure, expansion to accommodate development, and recommended improvements.

Currently, both the No Action Alternative and the Preferred Alternative fit within the water system plan build-out analysis, and any increases in the water demand are expected to be covered under existing agreements with the Cascade Water Alliance. The Cascade Water Alliance is planning for the growth of the communities it serves and has contracts and opportunities to secure the necessary water for the region's growth.

All development may require developer-financed improvements to the water system serving that development. These improvements will be constructed concurrently with the development. Some projects to serve the additional growth may benefit a larger area and several future projects. The upcoming water system plan update will need to re-evaluate these required water system projects. In most cases, areas proposed for commercial, multi-family, or mixed used development that are served by lines that are smaller than 12 inches will be required to increase the water line serving their development to at least 12 inches.

Under both the No Action Alternative and the Preferred Alternative, the city is expected to see growth and may require water system improvement to increase the fire flow to meet current standards. To ensure fire flow is not affected in areas of growth and that fire flow standards are met, developers will be required to install improvements to the water system.

Provided that the actions above are met, **no significant adverse impacts on water supply are expected in the City of Bellevue or in the Wilburton study area.**

Wastewater

Development of either the No Action Alternative or the Preferred Alternative would result in greater demands on the local wastewater collection system and on the downstream conveyance and treatment facilities.

The Wastewater System Plan is one of the tools the city uses to track that there is adequate sewer infrastructure and show where capacity is increasing in combination with the location of septic systems. The city will need to ensure that safe decentralized wastewater treatment is provided to all households in order to provide access to safe decentralized wastewater systems and protect their health and wellbeing.

Although demand for stormwater and other water services would increase, the application of regular capital facility planning, updated

system plans, existing regulations, plans, or other mitigation measures can reduce impacts associated with future growth under the No Action Alternative and the Preferred Alternative. New development and redevelopment must also comply with the current stringent stormwater regulations to be approved. Part of plan updates should include an emphasis on providing safe decentralized wastewater treatment to all households. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on wastewater in the City of Bellevue or in the Wilburton study area are expected.**

Solid Waste

Both the No Action Alternative and the Preferred Alternative would result in increases in population density and commercial development, which would increase demand for garbage, recycling and organics collection. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on solid waste in the City of Bellevue or in the Wilburton study area are expected.**

10.2.3 Alternative 0 (No Action)

The No Action Alternative continues the current Comprehensive Plan, with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers. The No Action Alternative has capacity for adding 41,000 new housing units over the 2023–2044 planning horizon. This is above the regional growth target for Bellevue, which is 35,000 new units, but does not meet other new planning requirements, including affordable housing across income bands and a range of housing types. There would be capacity for 124,000 new jobs under this alternative, which is above the regional growth target of 70,000 jobs. Housing capacity within the Wilburton study area would be small (less than 1 percent of the citywide total), and the Wilburton study area would have a modest share of citywide job capacity (5 percent), with no changes to allowed uses or building intensities.

The No Action Alternative would have the least amount of pressure on public services and utilities. Under Alternative 0, there would be the least growth and the least increase in demand for public services. The No Action Alternative is consistent with the expected growth in current water and wastewater system plans, which did not yet incorporate a more intense mixed use development pattern. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on public**

services or utilities in the City of Bellevue or in the Wilburton study area are expected.

10.2.4 Preferred Alternative

The Preferred Alternative has capacity for about 216,000 housing units, about 152,000 additional capacity for housing units over 2019 housing units and about 111,000 over the capacity under the No Action Alternative. About 47 percent of the additional capacity (and about 61 percent of the capacity over the No Action Alternative) is in low-density residential areas, primarily due to the additional capacity required under HB 1110 and HB 1337.

The Preferred Alternative has capacity for 323,000 jobs, about 185,000 additional capacity for jobs over 2019 jobs and about 60,000 over the capacity in the No Action Alternative. The Wilburton study area accounts for about 20 percent of the additional capacity and about 53 percent of the capacity over the No Action Alternative.

The Preferred Alternative would place more demand on public services and utilities than the No Action Alternative based on the build-out capacity. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on public services or utilities in the City of Bellevue or in the Wilburton study area are expected.**

10.3 Avoidance, Minimization, and Mitigation Measures

Through the capital facilities planning process, the City of Bellevue would continue to address changes in services for police, fire, and utilities. The growth planned for the area would be incremental, and the planning process to relevant plans would address improvements required to maintain response times, ensure access to parks, address student growth, and ensure that utilities can accommodate growth.

10.3.1 Other Mitigation Measures

Mitigation for public services and utilities is listed in DEIS Chapter 10, Section 10.4, *Avoidance, Minimization, and Mitigation Measures*.

10.4 Significant Unavoidable Adverse Impacts

Under both the No Action Alternative and the Preferred Alternative, potential future population and job growth would occur citywide and in the Wilburton study area. Effects on population growth on public services and utilities could be mitigated through the strategies in Section 10.3 above. The growth planned for the area would be incremental. Through the capital facilities planning process, the City of Bellevue would continue to address changes in public services and utilities. The school districts would continue to address changes in student enrollment.

While both the No Action Alternative and the Preferred Alternative will generate additional demand for water and sanitary sewer facilities, no significant unavoidable adverse impacts are expected with regular capital facility planning, updated system plans, and application of codes and standards. With implementation of mitigation measures and regular periodic review of plans, **no significant unavoidable adverse impacts on public services or utilities in the City of Bellevue or in the Wilburton study area are expected.**



CHAPTER 11 Transportation

11.1 Updates to the DEIS

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. Refer to Chapter 15, *Corrections and Clarifications*, for additional information.

In addition, Appendix K, *Transportation Preferred Alternative*, has been added to the FEIS to provide a supplemental transportation analysis for a 2044 land use scenario for the Preferred Alternative that is based on the growth forecast for Bellevue. As described in the next section, Chapter 11 analyzes growth to “build-out” capacity, meaning that developable or redevelopable parcels in the city would be developed or redeveloped to achieve the development potential allowed under the land use designation. Because it is not expected that this level of growth would all occur by 2044, Appendix K provides an analysis based on the 2044 growth forecast.

11.2 Potential Impacts

This section describes the five planning alternatives that were evaluated: No Action Alternative; Action Alternatives 1, 2, and 3; and the Preferred Alternative. It also describes the thresholds of significance used to determine impacts with each alternative, the methodology used to evaluate the future year analyses, and the resulting potential impacts for each scenario.

11.2.1 Planning Alternatives Evaluated

All growth numbers cited below are relative to 2019 land uses. While the horizon year for the analysis is 2044, this EIS analyzes growth to “build-out” capacity. “Build-out” means that developable or redevelopable parcels in the city would be developed or redeveloped to achieve the development potential allowed under the land use designation. In other words, under all alternatives, this EIS takes a conservative approach with respect to build-out and the transportation network “impacts” of a build-out scenario, as it is not expected that this level of growth would all occur by 2044.

Appendix K provides a transportation analysis for a 2044 land use scenario for the Preferred Alternative that is based on the growth forecast for Bellevue.

- **Alternative 0 (No Action)**¹ – This alternative would continue Bellevue’s current land use growth plans, which concentrate growth in the Downtown, BelRed, and East Main areas. The No Action Alternative has capacity for 41,000 additional housing units and space for an additional 124,000 jobs. This analysis assumes that the existing capacity is built out. Under the No Action Alternative, transportation investments as identified in the Transportation Facilities Plan (2022–2033) are assumed to be in place; this includes the NE 6th Street extension between I-405 and 116th Avenue NE in the Wilburton study area.
- **Alternative 1** – This alternative would focus growth beyond the urban core in all Bellevue’s Mixed Use Centers. Alternative 1 has build-out capacity for 59,100 additional housing units and space for an additional 177,200 jobs. This includes 9,600 housing units and 54,200 jobs in the Wilburton study area. This analysis assumes that the capacity is built out. In addition to the transportation investments assumed under the No Action Alternative, Alternative 1 also assumes new multimodal access connections in the Wilburton study area.
- **Alternative 2** – This alternative would focus growth into Bellevue’s Mixed Use Centers as well as into other areas with good access to transit service (meaning bus service with 15-minute frequency or better during the daytime and early evening). Alternative 2 has build-out capacity for 76,300 additional housing units and space for an additional 177,200

¹ Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County’s 2021 Urban Growth Capacity Report. See Chapter 2, *Preferred Alternative*, and Chapter 4, *Plans and Policies*, for a discussion of why these numbers are different.

jobs. This includes 14,600 housing units and 47,500 jobs in the Wilburton study area. This analysis assumes that the capacity is built out. In addition to the transportation investments assumed under the No Action Alternative, Alternative 2 also assumes new multimodal access connections in the Wilburton study area.

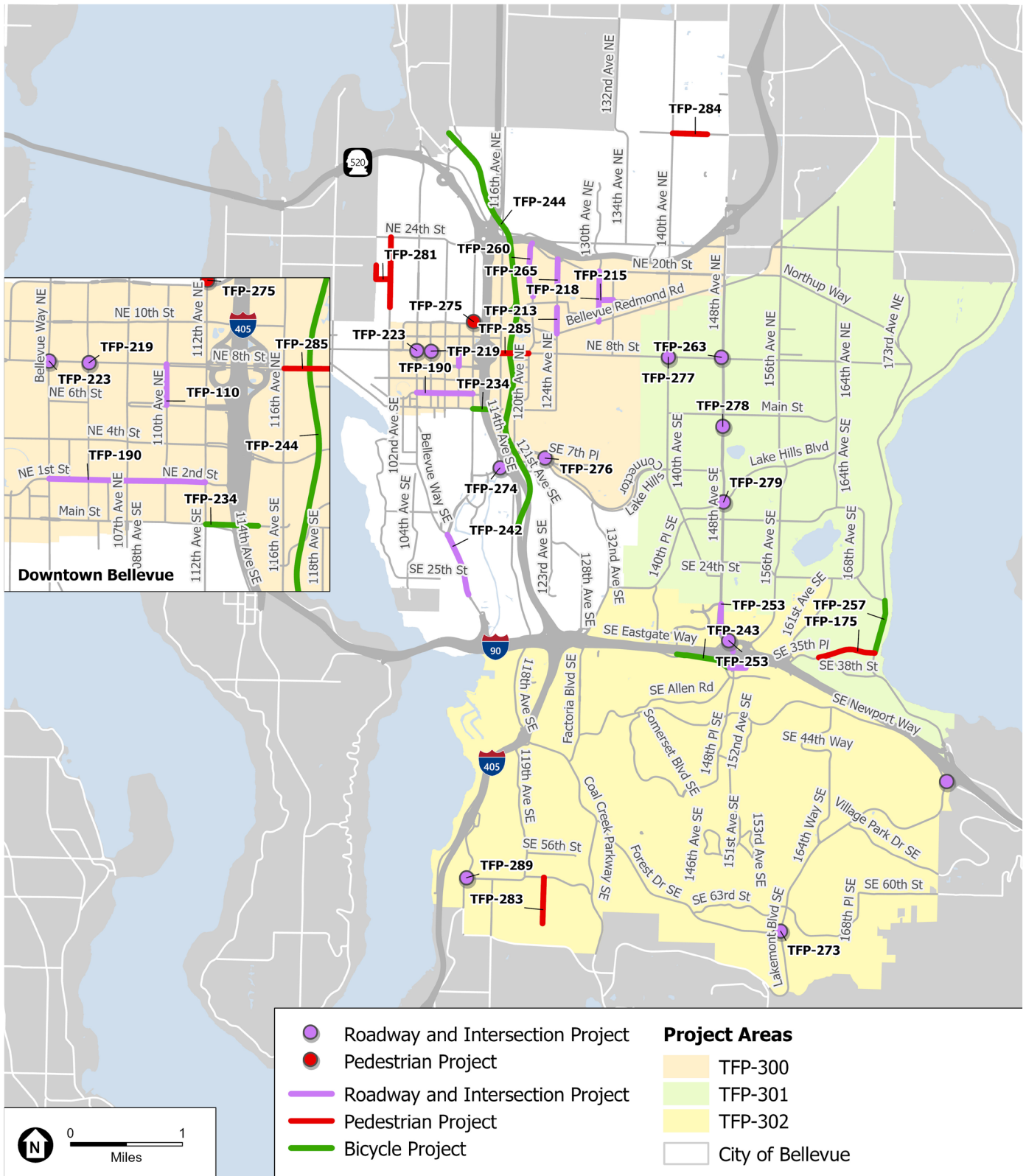
- **Alternative 3** – This alternative further expands land use growth to include Mixed Use Centers, areas with good access to transit service, and areas close to Neighborhood Centers. Alternative 3 assumes the build-out capacity for 94,500 additional housing units and space for an additional 200,400 jobs. This includes 14,700 housing units and 53,900 jobs in the Wilburton study area. This analysis assumes that the capacity is built out. As with Alternatives 1 and 2, Alternative 3 includes the No Action Alternative transportation investments and new multimodal access connections in the Wilburton study area. Alternative 3 is studied with two transportation networks with respect to the NE 6th Street extension: one scenario provides for an extension for high-occupant vehicle (HOV) and transit use only to 116th Avenue NE, and one scenario provides for an arterial extension for general purpose traffic, plus facilities for pedestrians and bicycles to 120th Avenue NE with at-grade intersections at 116th Avenue NE and at the Eastrail crossing.
- **Preferred Alternative** – The Preferred Alternative for the city as a whole is a hybrid of all of the three DEIS Action Alternatives, with additional changes to incorporate capacity mandated under HB 1110 and HB 1337. The Preferred Alternative includes additional capacity in Mixed Use Centers that is similar to a mix of Action Alternatives 2 and 3. The Preferred Alternative includes capacity in Neighborhood Centers, similar to Action Alternatives 2 and 3 with some retail-focused Neighborhood Centers accommodating more capacity in the middle of the centers. Outside of Mixed Use Centers and Neighborhood Centers, the future land use remains largely the same, similar to Action Alternative 1. Although the land use remains largely the same, the capacity outside of Mixed Use Centers and Neighborhood Centers has increased substantially due to HB 1110 and HB 1337. The Preferred Alternative assumes build-out capacity for 185,000 additional jobs. and about 152,000 additional housing units.

TRANSPORTATION NETWORK ASSUMPTIONS

As described above, the alternatives assume a set of new transportation investments as adopted in the 2022–2033 Transportation Facilities Plan (TFP). These projects are mapped in **Figure 11-1**, and the full TFP project list is included in Appendix C, *Traffic Data Revised*. The TFP is updated every 2 to 3 years, so updated versions will be adopted and additional transportation network projects may be implemented in advance of the 2044 horizon year. Specific additional transportation network projects are unknown at this time and so for the purposes of this EIS analysis, the financially constrained 2022–2033 TFP is used as the assumption for reasonably foreseeable transportation projects. Note that this does not include the proposed Bike Bellevue network as none of the projects proposed are currently designed, approved, or funded and, therefore, are not reasonably foreseeable transportation projects.

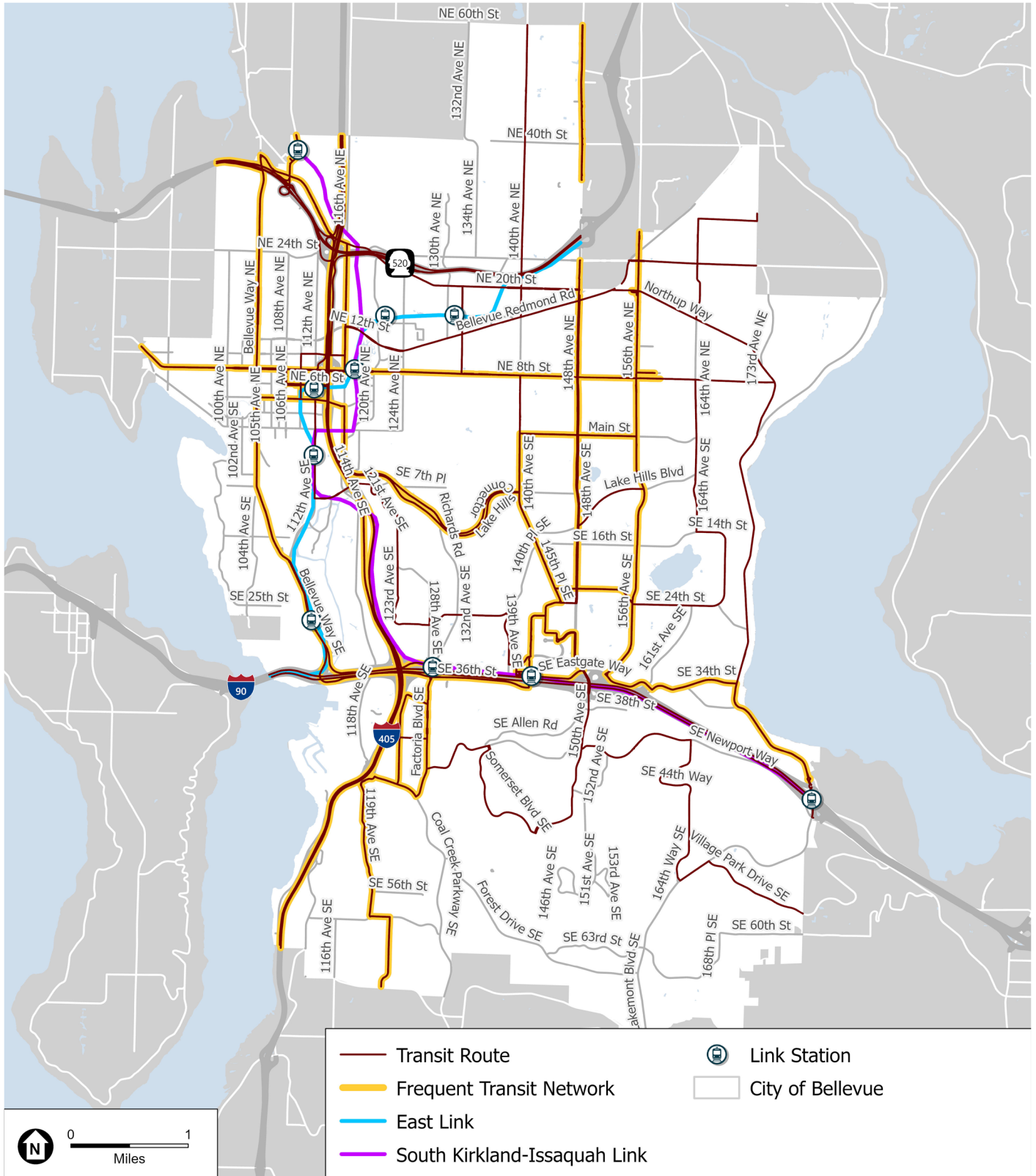
The modeling also assumes an extension of NE 6th Street for high occupancy vehicle (HOV) and high occupancy toll (HOT) lane access and transit use across I-405 to 116th Avenue NE under the No Action Alternative; Alternatives 1, 2, and 3; and the Preferred Alternative. A new southbound on-ramp to I-405 from Lake Hills Connector (a concept developed as part of the South Downtown I-405 Access Study) is also assumed in all future year alternatives. Alternative 3A and Preferred A Alternative are the same as Alternative 3 and the Preferred Alternative, respectively, with an additional arterial extension along NE 6th Street. This project would extend NE 6th Street eastward from 116th Avenue NE to 120th Avenue NE under these two alternatives.

By the 2044 horizon year, the Frequent Transit Network will include the East Link light rail extension as well as the South Kirkland to Issaquah extension (which would serve the Wilburton, Downtown, and East Main stations opening with East Link as well as new stations at Richards Road and Eastgate). Other transit agency projects such as King County Metro RapidRide and bus route restructuring to complement the light rail extensions will also be in place, though details of that restructuring are not finalized. **Figure 11-2** shows the future Frequent Transit Network based on the METRO CONNECTS 2050 long-range plan and Sound Transit’s planned system expansion.



SOURCE: City of Bellevue 2023

FIGURE 11-1 2022-2033 Transportation Facilities Planned Projects



SOURCE: City of Bellevue 2023

FIGURE 11-2 Future Frequent Transit Network

TRAVEL DEMAND FORECASTING MODEL

Bellevue maintains a regional travel demand model called BKRCast, which is based on the Puget Sound Regional Council (PSRC) SoundCast model but with additional local detail in the Bellevue-Kirkland-Redmond (BKR) area. BKRCast is used to predict how travel behavior will change based on land use and transportation network inputs. The model is a tool best used to compare the relative differences among alternatives rather than a precise prediction of future travel behavior. In other words, the model indicates which alternatives are likely to be more impactful than others, although the exact locations and magnitude of future impacts cannot be forecasted with certainty, particularly in this programmatic EIS where specific land use development projects are unknown.

The model is an activity-based model, which means it simulates individual travel patterns over the course of a day based on travel survey data, demographic information, land use inputs, and travel options. The model has been calibrated and validated for use in Bellevue.

Key features of the model include:

- **Analysis Years:** The BKRCast model has a base year of 2019 and a horizon year of 2044. For FEIS modeling purposes, the “build-out” of the growth alternatives is an input, even though the development would occur well beyond this 20-year planning horizon.
- **Land Use:** Land use forecasts (representing a hypothetical full build-out scenario) were developed for each of the alternatives using a geographic unit called a Traffic Analysis Zone. The model also includes land use assumptions for the rest of the region based on PSRC growth targets.
- **Network Representation:** All major corridors and state facilities are represented in the BKRCast, allowing volume and travel time forecasts for the Primary Vehicle Corridors and System Intersections defined in the Mobility Implementation Plan (MIP).
- **Transit:** The base year model assumes transit service currently in place, while the 2044 model assumes reasonably foreseeable projects such as continued expansion of the Link light rail system and other transit agency projects such as King County Metro RapidRide.
- **Travel Costs:** Consistent with PSRC guidance, BKRCast assumes that regional congestion pricing will be in place.

2044 Land Use Forecast

Appendix K to this FEIS includes BKRCast modeling for a 2044 land use scenario that is based on the growth forecast for Bellevue. Appendix K includes a transportation network that is identical to all the Action Alternatives; the only variable is the land use inputs for jobs and housing.

- **Travel Demand:** The model predicts travel demand for the following modes of travel: drive alone, single occupancy vehicle, high occupancy vehicle, truck, transit, bicycle, and walk. Travel demand is estimated for four time periods: AM peak, midday, PM peak, and night. This EIS analysis focuses on the PM peak hour, during which the highest number of people are expected to be traveling.

11.2.2 Thresholds of Significance

The Action Alternatives are assessed against the No Action condition to evaluate the magnitude of potential impacts. To determine whether an impact is considered significant, this EIS first defines the impact in the context of the No Action Alternative and then uses the following thresholds, which were developed based on the performance metrics and targets established in the MIP.

An impact under the No Action Alternative is generally defined and measured if the alternative would result in any of the following:

- Reduction in the degree of system completeness (as defined by the MIP performance targets) for any of the following:
 - Arterial sidewalk network
 - Spacing of designated arterial crossings
 - Bicycle network corridors
 - Frequent Transit Network stop passenger amenities
- Transit travel time ratio of greater than 2.0 for Activity Center pairs identified in the MIP.
- System Intersection volume-to-capacity (V/C) ratio that does not meet the performance target identified per Performance Management Area (PMA) in the MIP.²
- Primary Vehicle Corridor travel speed that does not meet the performance target identified per PMA in the MIP.
- State facility in Bellevue that does not meet the Washington State Department of Transportation (WSDOT) Level of Service (LOS) standard.

² Performance Management Areas (PMAs) are geographic areas of Bellevue defined in the MIP that have distinct land use patterns, mixes and intensities of development, and transportation options. More information about PMAs is provided in Section 11.3.7 of this FEIS.

A variety of factors that may influence future parking and safety effects under the No Action Alternative are discussed qualitatively.

An impact is defined as significant if an Action Alternative (Alternatives 1, 2, 3, and Preferred) would result in any of the following:

- Degradation in the degree of system completeness (as defined by the MIP performance targets) relative to the No Action Alternative for any of the following:
 - Arterial sidewalk network
 - Spacing of designated arterial crossings
 - Bicycle network corridors
 - Frequent Transit Network stop passenger amenities
- An increase in the transit travel time ratio beyond 2.0 for Activity Center pairs that met the MIP performance target under No Action; an increase in the travel time ratio by 0.1 or more for any Activity Center pair that would not meet the MIP performance target under No Action.
- An increase in a System Intersection V/C beyond the performance target identified in the MIP; for an intersection that already does not meet the performance target, an increase in the V/C ratio by 0.05 or more over No Action.
- A reduction in the Primary Vehicle Corridor speed below the performance target identified in the MIP; for a corridor that already does not meet the performance target, a reduction in the travel speed/Typical Urban Travel Speed ratio by 0.05 or more below No Action.
- A state facility in Bellevue that does not meet the WSDOT LOS standard for a facility that met the LOS standard under No Action; an increase in state facility V/C ratio of 0.01 or more for a state facility that would not meet the LOS standard under No Action.
- Vehicle miles traveled (VMT) per capita increase of at least 1 percent over the No Action Alternative.

Potential parking and safety impacts relative to the No Action Alternative are discussed qualitatively and consider the following factors:

- Whether an Action Alternative would result in parking demand that would exceed supply by a noticeable magnitude relative to the No Action Alternative.
- Whether an Action Alternative would increase the likelihood of additional severe or fatal crashes within the City of Bellevue compared to the No Action Alternative (considerations include the pace of safety infrastructure investment, the relative change in modal conflicts, and vehicle speed).

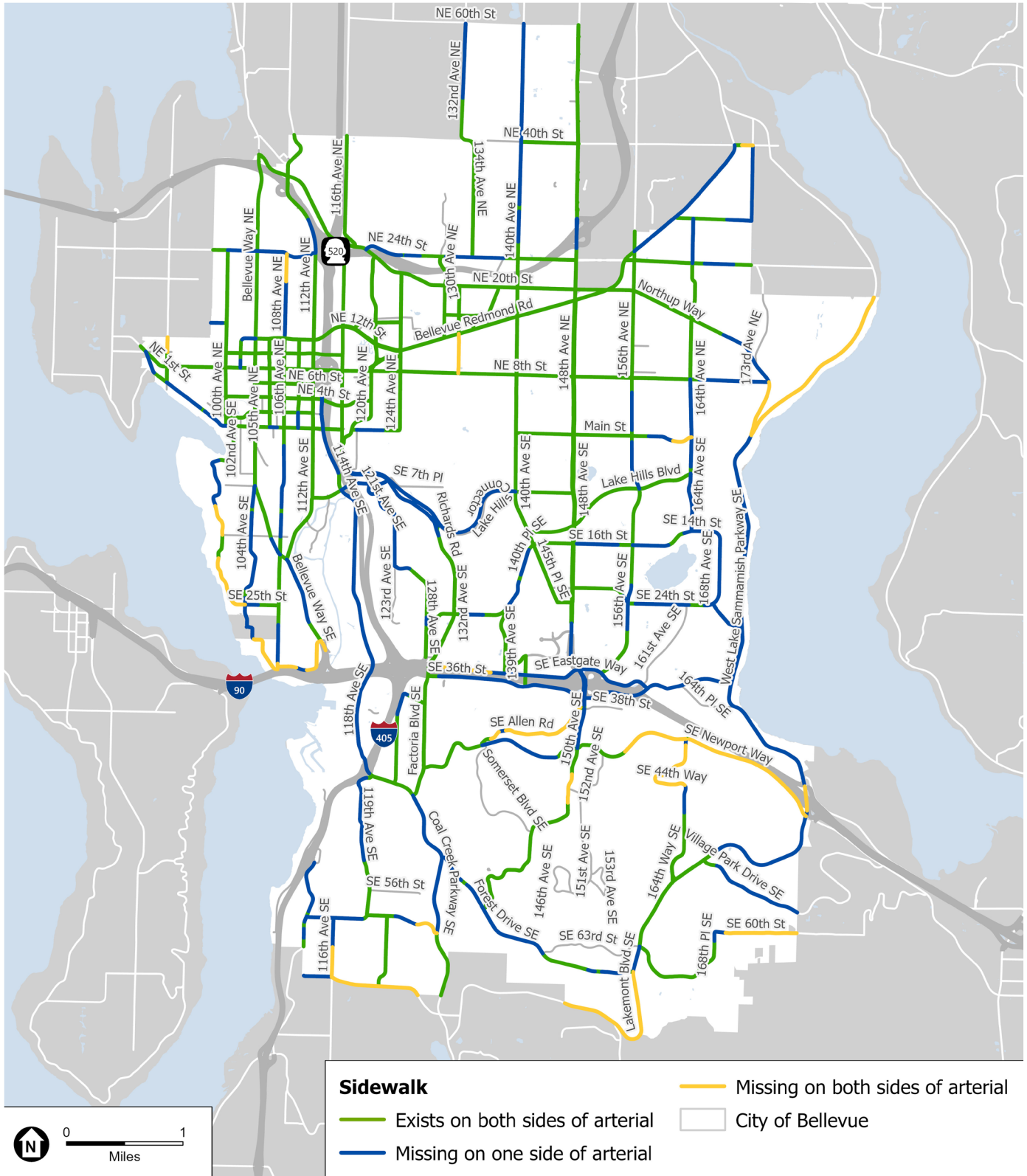
11.2.3 Impacts Common to All Alternatives

This section summarizes the performance evaluation completed for projected future conditions under build-out scenarios for each alternative. These are the conditions of the transportation system that would be affected in a similar way by all alternatives. By evaluating hypothetical future conditions under build-out scenarios, city staff, the Bellevue City Council and the Transportation Commission, and the community can understand the potential relative implications of how land use growth and planned transportation investments would affect travel patterns and the performance of the transportation system.

PEDESTRIAN NETWORK – SYSTEM COMPLETENESS

Bellevue’s pedestrian network is made up of sidewalks along arterials and neighborhood streets as well as trails. For the purposes of this EIS (and consistent with the MIP), pedestrian network performance is quantitatively analyzed for a subset of that network along the arterial streets. Bellevue intends to achieve an arterial pedestrian network completeness performance target of 100 percent in the future, with complete and connected sidewalks on both sides of every arterial.

Based on the projects planned to be implemented through the most recently adopted Transportation Facilities Plan, **Figure 11-3** displays the future arterial pedestrian network and locations where gaps would remain. In addition to the projects defined in the TFP, other sidewalk and mid-block crossing projects along with private sector projects will contribute to system completeness. In other words, the analysis described here represents the minimum level of new facilities expected to be constructed by the horizon year of this EIS.



SOURCE: City of Bellevue 2023

FIGURE 11-3 Pedestrian Network Performance – All Alternatives with TFP Projects

As shown in **Table 11-1**, Bellevue’s planned projects would continue to progress toward completing the pedestrian network. The improvements noted here reflect only the projects planned for in the TFP and do not account for privately funded frontage improvements, such as sidewalks, intersection improvements, and mid-block crossings, that are required with development. This includes adding sidewalks along 5 miles of the arterial network that are currently classified as gaps. The improvements would bring the proportion of the arterial pedestrian network with a sidewalk on both sides from 56 to 59 percent, increase the proportion with a sidewalk one side from 32 to 33 percent, and decrease the proportion of the arterial network with no sidewalk from 12 to 8 percent.

TABLE 11-1 Pedestrian Network Performance Target Results – All Alternatives with TFP Projects

Citywide		Sidewalk on Both Sides		Sidewalk on One Side		Sidewalk Gaps	
		Existing	Future	Existing	Future	Existing	Future
Miles		77	82	45	45	17	12
Proportion of Total		56%	59%	32%	33%	12%	8%
PMA		Sidewalk on Both Sides		Sidewalk on One Side		Sidewalk Gaps	
		Existing	Future	Existing	Future	Existing	Future
Type 1	Downtown	95%	95%	5%	5%	0%	0%
	BelRed	86%	98%	8%	1%	6%	1%
	Wilburton-East Main	56%	59%	41%	41%	3%	0%
Type 2	Crossroads	100%	100%	0%	0%	0%	0%
	Eastgate	29%	29%	63%	65%	8%	6%
	Factoria	70%	70%	28%	28%	3%	3%
Type 3 Residential		47%	50%	37%	39%	16%	12%

SOURCE: Fehr & Peers 2023

The biggest change in sidewalk completion would be in the BelRed PMA, where there would be a sidewalk on both sides of 98 percent of the arterial network with implementation of the 2022–2033 TFP. In the Wilburton-East Main PMA and the Type 3 Residential PMA, there would also be noticeable increases in the percentage of system

completion. As is the case today, system completion in the Type 3 Residential PMA would lag behind the Type 1 and Type 2 PMAs.

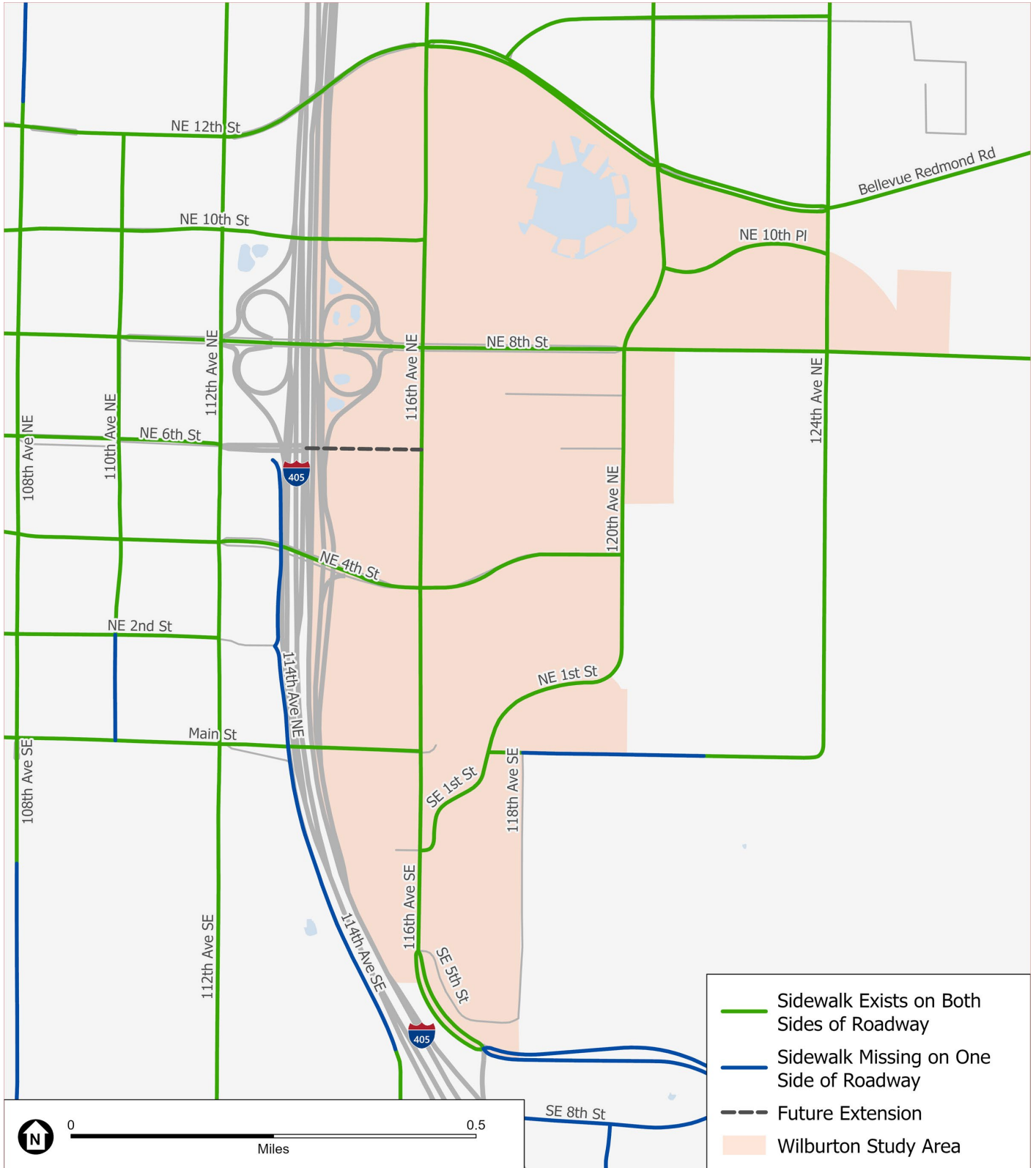
Because the No Action Alternative would increase the degree of system completeness for arterial sidewalks, there is no significant impact. Likewise, all of the Action Alternatives are expected to increase the level of system completeness because the additional increment of growth would result in more locations with frontage improvements. Similar to sidewalk improvements, more designated arterial crossings are expected to be implemented over the course of the planning period. None of the Action Alternatives are expected to result in any reduction of system completeness with regard to arterial crossing spacing. Therefore, **no significant impacts on the pedestrian network are identified under any of the Action Alternatives.**

A geographic information system (GIS) analysis of the alternatives compares the proportion of households and jobs within $\frac{1}{4}$ mile of a pedestrian facility. This includes any pedestrian facility, whether it is on the arterial network or local network. Findings indicated that 99.3 to 99.5 percent of households and 99.5 to 100 percent of jobs would be within $\frac{1}{4}$ mile of a pedestrian facility for Alternatives 1, 2, and 3; the Preferred Alternative is expected to provide similar access to the pedestrian network. In other words, the alternatives do not substantively vary in terms of providing opportunities for new residents and workers to be close to the pedestrian network.

Wilburton Study Area

With implementation of the 2022–2033 TFP, most of the arterial network in the Wilburton study area will have a sidewalk on both sides (note this is a different geography than the Wilburton-East Main PMA). As noted in the citywide discussion, there may be other sidewalk and arterial crossing projects beyond those defined in the TFP along with private sector projects that will contribute to system completeness. Therefore, this analysis represents the minimum level of new facilities expected to be constructed by the horizon year of this EIS.

As seen in **Figure 11-4**, the only missing sidewalk segment is on Main Street east of 118th Avenue SE where the arterial has sidewalk on only one side. Because the No Action Alternative would not reduce the system completeness for arterial sidewalks, there is no significant impact.



SOURCE: City of Bellevue 2023

FIGURE 11-4 Pedestrian Network Performance in the Wilburton Study Area - All Alternatives

The Action Alternatives assume there would be additional multimodal access corridors in the Wilburton study area. Specific access corridor types are applied conceptually to a transit-oriented development (TOD) multimodal access and walkability concept map in **Figure 11-5** that updates the street network and connectivity map from the 2018 Wilburton Commercial Area Study. It is a composite map of different multimodal elements (conceptual, planned, and existing) intended to communicate the vision and application of policies that will support making the Wilburton study area a walkable, pedestrian-scale district. These access types and their associated function include:

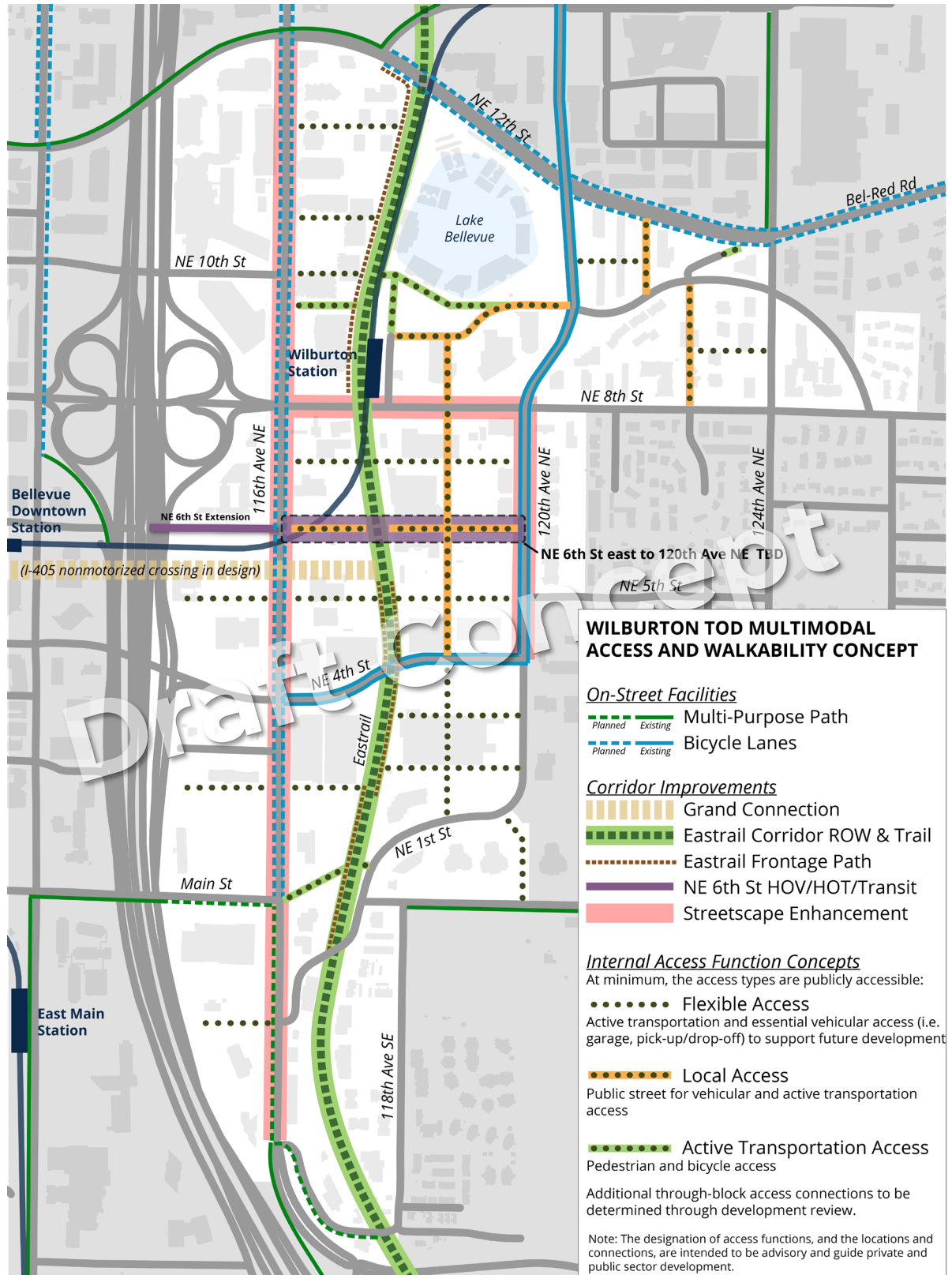
- **Flexible Access.** Active transportation and essential vehicular access to support future development.
- **Local Access.** Public street for vehicular and active transportation access.
- **Active Transportation Access.** Pedestrian and bicycle access.
- **Through-Block Access.** Access through and between larger blocks and development sites.

Therefore, the pedestrian network may have additional connections beyond those provided under the No Action Alternative, providing a benefit to the area (although 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.**

BICYCLE NETWORK – SYSTEM COMPLETENESS

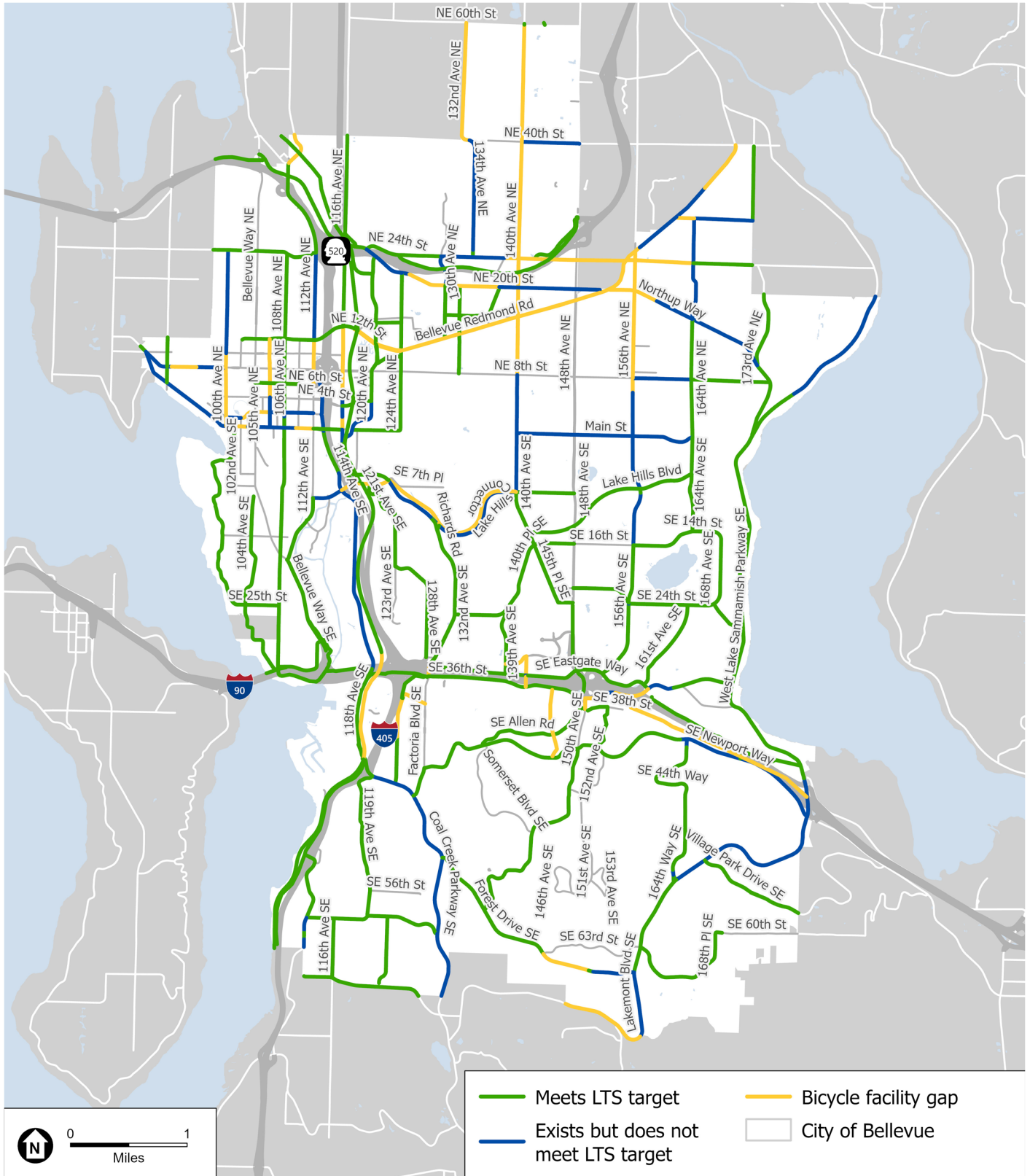
Bellevue is targeting completion of bicycle network facilities to meet the intended level of traffic stress (LTS) of the bicycle network as defined in the MIP. Based on the projects planned to be implemented through the most recently adopted TFP, **Figure 11-6** displays the performance of the future bicycle network and locations where there would still be gaps in the network.³ In addition to the projects defined in the TFP, other bicycle facility projects will contribute to system completeness. In other words, the analysis described here represents the minimum level of new facilities expected to be constructed by the horizon year of this EIS.

³ The future year evaluation considers whether a change to the type of bicycle facility on a given roadway would change the LTS. It does not account for potential increases in traffic volumes (which would have a negative effect on LTS) as they would also be associated with decreases in travel speed (which would have a positive effect on LTS).



SOURCE: City of Bellevue 2023

FIGURE 11-5 Wilburton Study Area Draft TOD Access and Walkability Concepts Map



SOURCE: City of Bellevue 2023

FIGURE 11-6 Bicycle Network Performance – All Alternatives with TFP Projects

As shown in **Table 11-2**, the proportion of the bicycle network that meets the intended LTS target is projected to increase from 54 to 62 percent, the proportion of the network with a facility that does not meet the intended LTS target is projected to decrease from 25 to 21 percent, and the proportion of the network with a facility gap would decrease from 22 to 17 percent.

TABLE 11-2 Bicycle Network Performance Target Results – All Alternatives with TFP Projects

		Facility Meets LTS		Facility Does Not Meet LTS		Facility Gaps	
		Existing	Future	Existing	Future	Existing	Future
Citywide							
Miles		74	86	34	29	30	24
Proportion of Total		54%	62%	25%	21%	22%	17%
Performance Management Area		Facility Meets LTS		Facility Does Not Meet LTS		Facility Gaps	
		Existing	Future	Existing	Future	Existing	Future
Type 1 PMA	Downtown	28%	34%	32%	33%	39%	33%
	BelRed	37%	48%	8%	9%	56%	44%
	Wilburton-East Main	25%	47%	39%	37%	36%	17%
Type 2 PMA	Crossroads	25%	25%	35%	35%	40%	40%
	Eastgate	72%	81%	12%	5%	16%	14%
	Factoria	61%	64%	26%	23%	13%	13%
Type 3 Residential PMA		60%	67%	26%	22%	14%	12%

SOURCE: Fehr & Peers 2023

Because the No Action Alternative would increase the degree of system completeness for the bicycle network, there is no significant impact. Likewise, the Action Alternatives are expected to increase the level of system completeness because the additional increment of growth would result in more locations with frontage improvements. Therefore, neither the No Action Alternative nor the Action Alternatives are expected to reduce the degree of system completeness of the bicycle network, so **no significant impacts on the bicycle network are identified under any of the future year alternatives.**

A GIS analysis of the alternatives was conducted to compare the proportion of households and jobs with ¼ mile of a bicycle facility.

This included any type of bicycle facility regardless of whether it met its intended LTS. Findings indicated that 94 to 95 percent of households and 98.8 to 99.3 percent of jobs would be within ¼ mile of a bicycle facility for Alternatives 1, 2, and 3; the Preferred Alternative is expected to provide similar access to the bicycle facility network. Therefore, there is little variation among the alternatives in terms of the proportion of residents and workers who would be in close proximity to the bicycle network.

Wilburton Study Area

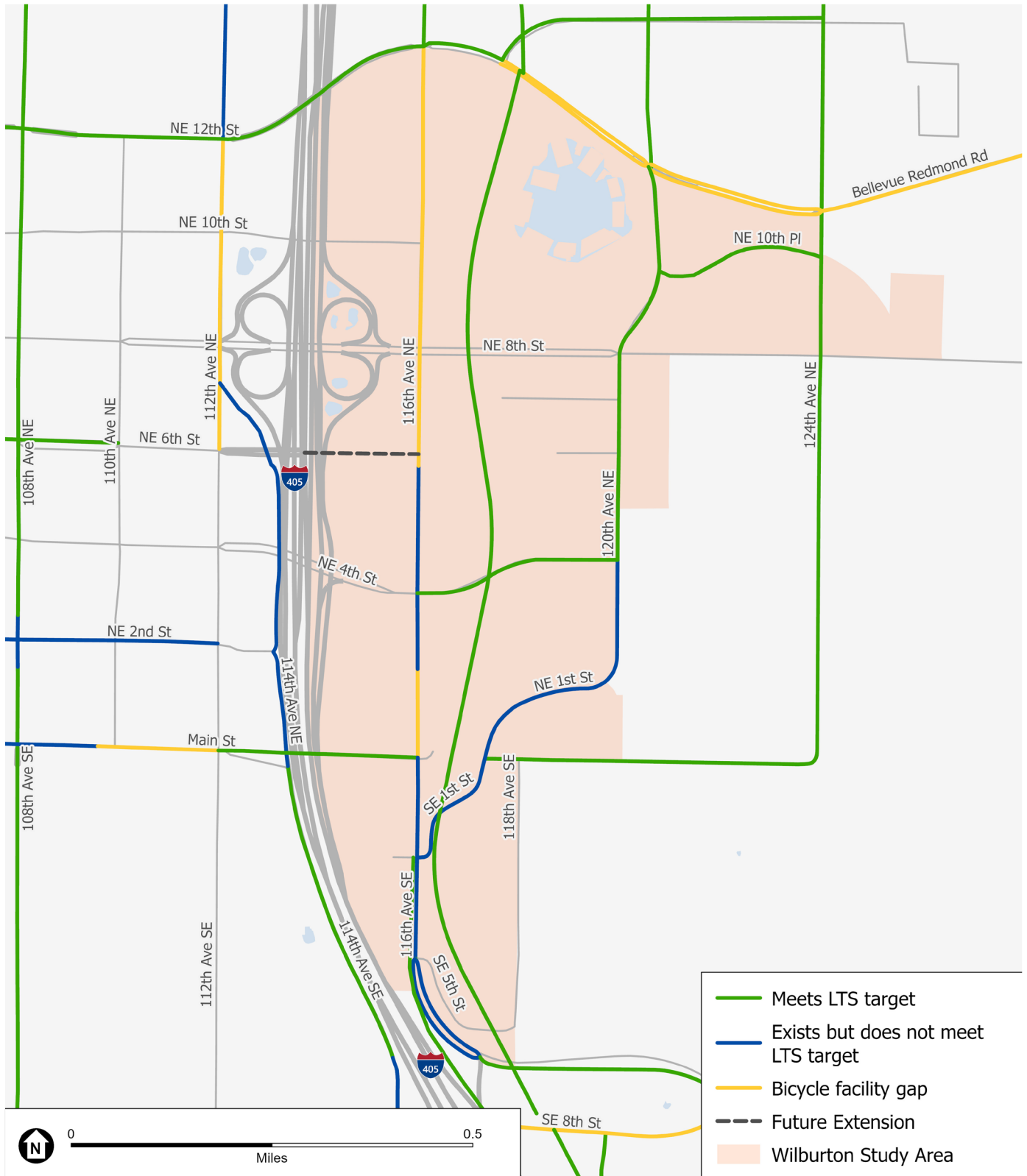
In all alternatives, the bicycle network in the Wilburton study area would become more complete. **Figure 11-7** presents the future bicycle network, including the new segments that would meet the LTS target for the area. In particular, the Eastrail multipurpose path would be complete. Improvements are also planned along 116th Avenue NE and SE 1st Street. As the bicycle network would be improved under the No Action Alternative, there would be no adverse impact on the Wilburton study area bicycle network.

All Action Alternatives include additional multimodal connections in the Wilburton study area. Therefore, the bicycle network may have additional connections beyond those provided under the No Action Alternative providing a benefit to the area. Therefore, there is **no adverse impact on the Wilburton study area bicycle network under the Action Alternatives.**

TRANSIT NETWORK – SYSTEM COMPLETENESS

Bellevue and its transit agency partners will continue to increase the number and quality of transit passenger amenities at bus stops across the city regardless of which alternative is selected. Moreover, the East Link light rail will add new transit stations with the passenger amenities defined in the MIP. Because the **No Action Alternative** would increase the degree of system completeness for the transit network, **there is no significant impact.**

Likewise, the Action Alternatives would potentially increase the level of system completeness because the additional increment of growth would result in more locations with frontage improvements, some of which would include passenger amenities at bus stops. None of the Action Alternatives would result in any reduction of the degree of system completeness of transit stop passenger amenities. Therefore, **no significant impacts on the transit network are identified under any of the Action Alternatives.**



SOURCE: City of Bellevue 2023

FIGURE 11-7 Bicycle Network Performance in the Wilburton Study Area - All Alternatives

SAFETY

By the 2044 horizon year of this EIS analysis, Bellevue will have been investing in transportation safety improvements for several decades through the lens of the Vision Zero Strategic Plan. Based on these investments, the design and operations of the transportation system is expected to be fundamentally safer than existing conditions.

However, even with a transportation system that is safer in design and operations, all alternatives accommodate more residents, employees, and visitors across the entire city and within the Wilburton study area. With more people traveling in the city, there is more opportunity for people to become involved in a crash. Higher shares of people walking and bicycling also puts people at greater risk of being injured or killed if they are involved in a crash with a vehicle. Therefore, the overall number of severe and fatal injury crashes could increase for all alternatives compared to existing conditions.

When assessing potential safety impacts of the Action Alternatives, the following threshold is applied:

- Whether an Action Alternative would increase the likelihood of additional severe or fatal crashes within the City of Bellevue compared to the No Action Alternative.

While the total number of severe or fatal crashes could be higher with the Action Alternatives compared to the No Action Alternative (because Action Alternatives accommodate more residents and employees), there is no reason to assume that the likelihood of severe or fatal crashes would increase with the Action Alternatives. This is because the Action Alternatives would provide opportunity for Bellevue to implement more safety improvements through a mix of frontage improvements built as part of new development, impact fee funded projects that include safety elements, and new safety-oriented capital projects funded through the city's Capital Investment Program Plan (CIP). Therefore, **no significant safety impacts are expected as a result of any of the alternatives either citywide or for the Wilburton study area.**

PARKING

As development in Bellevue increases under all the alternatives, new development will 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. The city will use this combination of off-street, developer-provided parking, and on-street

parking management to strive for a balance between parking demand and supply for any of the alternatives.

As is the case today, changes in development patterns and the type of uses occupying buildings could result in short-term instances where a driver may park their vehicle in an area where parking is not allowed or where parking would impact other modes or curb users. However, the existing methods that private parking lot owners and the city have to manage inappropriate parking will address parking impacts over time. Therefore, **no significant parking impacts are expected as a result of any of the alternatives citywide or for the Wilburton study area.**

11.2.4 Alternative 0 (No Action)

The No Action Alternative represents the transportation network conditions that can be expected if no changes are made to currently adopted policies. Therefore, No Action serves as the baseline against which potential impacts of the Action Alternatives are evaluated. This section summarizes analysis results and identifies potential transportation network impacts that are expected under the No Action Alternative, as growth will continue even under currently adopted policies.

MODE SHARE

Mode share refers to the proportion of trips that are taken by each mode of travel: walk, bicycle, single-occupant vehicle (SOV), HOV, and transit. Mode share for trips that originate from or are destined to Bellevue is presented in **Table 11-3** and is broken out by Bellevue workers and Bellevue residents. The table compares existing and future year data to indicate how travel behavior is projected to change over the next two decades. In particular, the shares of trips made by walking and transit are expected to increase while the shares of people driving are expected to decrease. In particular, the transit mode share for workers is projected to more than triple from 9 to 32 percent with the addition of light rail and bus rapid transit (BRT) travel options. Considering SOV and HOV trips together, the share of trips made by driving is expected to decrease by 25 percentage points for Bellevue workers and by 10 percentage points for Bellevue residents.

TABLE 11-3 Mode Share – No Action Alternative

Mode	Bellevue Workers		Bellevue Residents	
	Existing	No Action	Existing	No Action
Walk	6%	8%	13%	18%
Bicycle	0%	0%	1%	1%
SOV	60%	41%	33%	25%
HOV	25%	19%	46%	44%
Transit	9%	32%	7%	12%

SOURCE: City of Bellevue 2023

NOTE: Mode shares are rounded and may not sum to 100%.

VMT PER CAPITA

As shown in **Table 11-4**, the percentage of total daily VMT by Bellevue residents and workers is expected to increase by approximately 25 percent under No Action Alternative build-out, from 4.1 million miles to over 5.1 million miles. However, the daily VMT per capita would decrease from 28.5 miles to 22.6 miles. This reflects the changes discussed above in the *Mode Share* section. In other words, while the total daily VMT is expected to increase due to growth, the pace at which it increases is less than the rate of growth, and the per capita daily VMT is expected to decrease as a larger number of trips are made by non-vehicle modes, and average vehicle trip is shorter.

TABLE 11-4 VMT and VMT per Capita – No Action Alternative

	Existing	No Action
Daily VMT	4,099,000 miles	5,112,000 miles
Daily VMT per Capita	28.5 miles	22.6 miles

SOURCE: City of Bellevue 2023

TRANSIT TRAVEL TIME

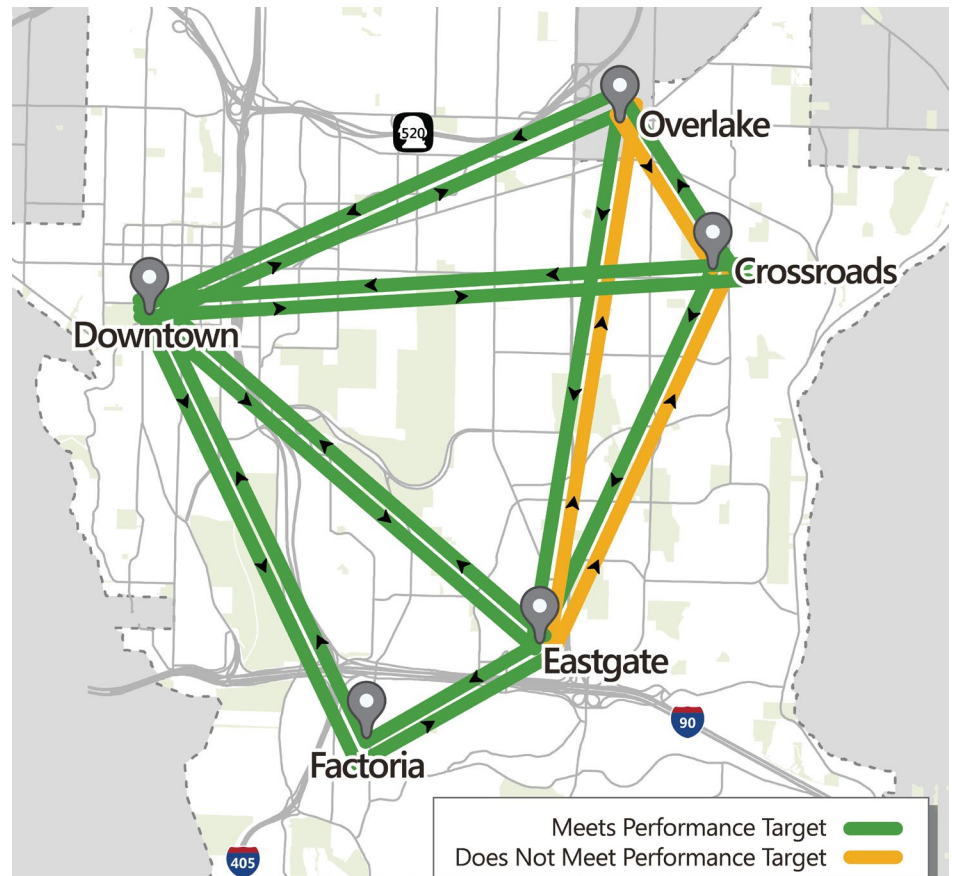
Using the forecasted Primary Vehicle Corridor travel speed for vehicles as well as projected transit travel time, transit travel time ratios were calculated for each Activity Center pair. The performance target for transit travel time ratio is 2.0, which means that a trip on a bus or train would take twice as long as a trip in a private vehicle. The results are shown in **Table 11-5** and mapped in **Figure 11-8**. The

transit travel time ratios that would not meet the performance target are **shown in bold**.

TABLE 11-5 Transit Travel Time Ratio – No Action Alternative

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



SOURCE: City of Bellevue 2023

FIGURE 11-8 Transit Network Performance – No Action Alternative

Transit travel time ratios are expected to improve for all Activity Center pairs under No Action Alternative build-out, meaning that transit is expected to be a more time-competitive mode in the future. Several key factors are described below:

- **Link Light Rail Extensions:** The BKRCast model assumes the East Link extension is open as well as the planned South Kirkland-Issaquah extension, which would include new stations at Eastgate and Richards Road and then connect to the East Main, Downtown, and Wilburton stations. Therefore, the transit travel times between Downtown, Overlake, Factoria, and Eastgate assume Link light rail will provide substantial improvements to the transit travel time ratios. Some pairs' transit travel time ratios would be less than 1.0, indicating that a transit trip travel time is expected to be shorter than a private vehicle trip during the PM peak period.
- **NE 6th Street Extension:** The NE 6th Street extension across the northbound lanes of I-405 to 116th Avenue NE would allow buses to access the Bellevue Transit Center more efficiently by avoiding congestion along NE 8th Street. This will result in a benefit to the transit travel time between Downtown and Crossroads.
- **Bellevue College Connection:** The transit travel time ratio between Eastgate and Crossroads would decrease with the more direct Bellevue College Connection, bringing the travel time ratio below the 2.0 performance target for the Crossroads to Eastgate trip.

However, even with these substantial improvements, there are three Activity Center pairs that would not meet the MIP identified transit travel time ratio threshold of 2.0, constituting an **impact under the No Action Alternative:**

- Eastgate to Crossroads
- Eastgate to Overlake
- Overlake to Crossroads

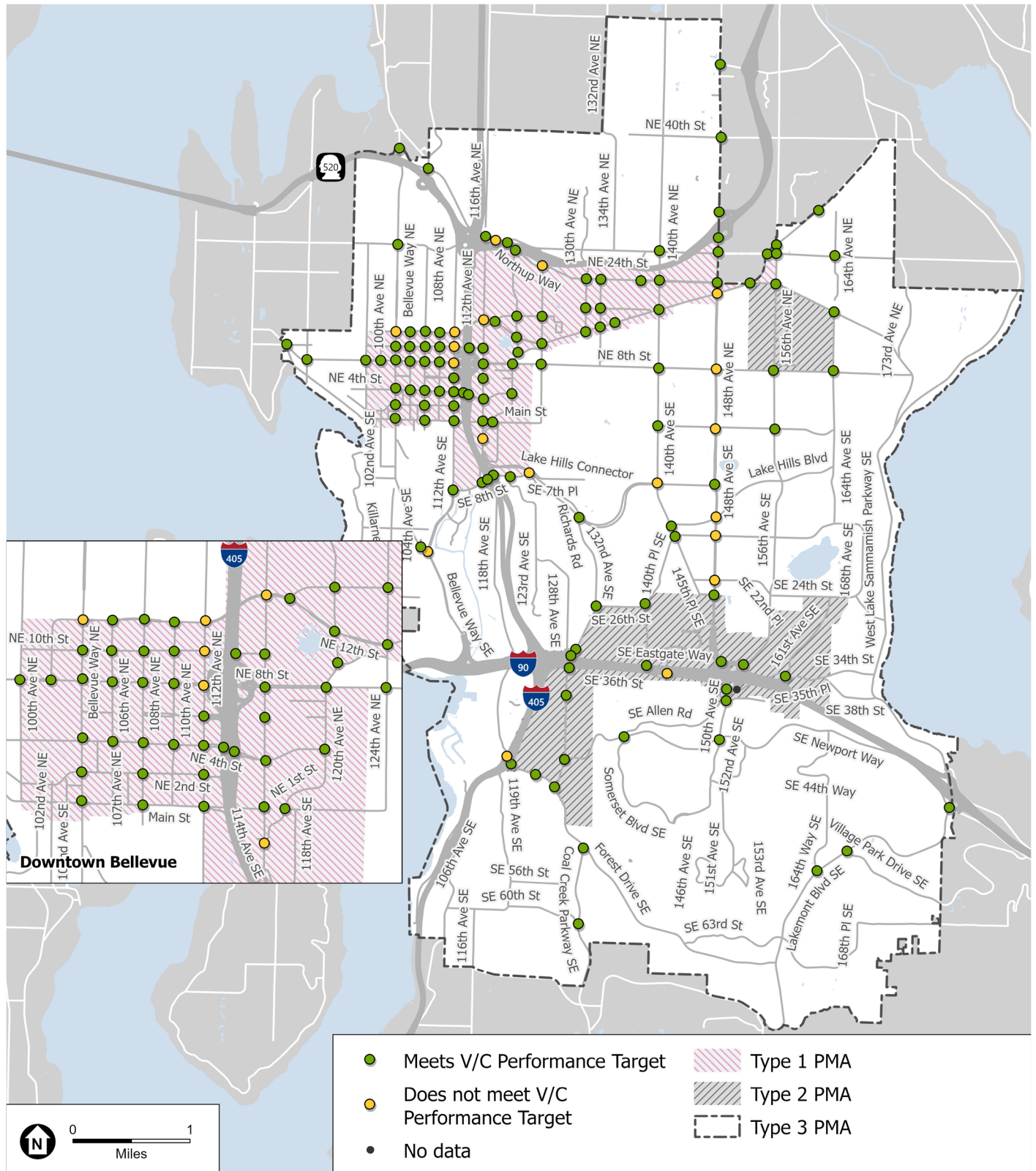
SYSTEM INTERSECTION VOLUME-TO-CAPACITY RATIO

The BKRCast travel demand model was used to forecast vehicle volume at each System Intersection under the No Action Alternative. A summary of results is shown in **Table 11-6** and mapped in **Figure 11-9**. The table includes all intersections that would not meet the performance target under the No Action Alternative along with the V/C ratio expected under existing conditions for comparison. A complete tabular summary is included in Appendix C.

TABLE 11-6 Vehicle Network Performance – System Intersections – No Action Alternative

Performance Management Area	Performance Target	% of Intersections Meeting Target ^a	
		Existing	No Action
Type 1 PMA	1.00	97%	88%
Type 2 PMA	0.90	96%	91%
Type 3 PMA	0.85	78%	78%
Total System intersections		92%	86%
Performance Management Area and Performance Target	Intersections Not Meeting Target under No Action Alternative	V/C Ratio	
		Existing	No Action
Type 1 PMA (Performance Target V/C = 1.00)	Bellevue Way NE & NE 12th St	0.65	1.02
	112th Ave NE & NE 8th St	1.00	1.23
	112th Ave NE & NE 10th St	0.72	1.12
	112th Ave NE & NE 12th St	0.75	1.05
	116th Ave NE & NE 12th St	0.80	1.32
	148th Ave NE & Bel-Red Rd	0.98	1.13
	124th Ave NE & Northup Wy	0.54	1.23
	116th Ave SE & SE 1st St	0.85	1.15
	Lk Hills Connector & SE 7th Pl	1.03	1.02
Type 2 PMA (Performance Target V/C = 0.90)	142nd Ave SE & SE 36th St	0.89	0.92
	I-405 SB Ramps & Coal Creek Pkwy	0.81	1.13
Type 3 PMA (Performance Target V/C = 0.85)	112th Ave SE & Bellevue Wy SE	0.77	1.00
	140th Ave SE & SE 8th St	0.82	0.87
	148th Ave NE & NE 8th St	0.99	0.96
	148th Ave & Main St	0.95	0.95
	148th Ave SE & Lk Hills Blvd	0.97	0.86
	148th Ave SE & SE 16th St	0.88	0.86
	115th Pl NE & Northup Wy	0.95	1.00
148th Ave SE & SE 22nd St	0.84	0.86	

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-9 System Intersection Performance - No Action Alternative

Under the No Action Alternative, 66 of 75 (88 percent) of System Intersections in Type 1 PMAs are expected to meet the target (a decrease of six intersections from existing conditions), 21 of 23 (91 percent) of System Intersections in Type 2 PMAs are expected to meet the target, and 28 of 36 (78 percent) of System Intersections in the Type 3 PMA are expected to meet the target. The 19 intersections that are expected to not meet the V/C performance target, constituting an impact under the No Action Alternative are **shown in bold** in Table 11-6.

PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

The BKRCast travel demand model was used to forecast vehicle corridor speed along Primary Vehicle Corridors under the No Action Alternative. The locations that do not currently meet the performance target would also not meet the target under the No Action Alternative, constituting an impact. Fourteen of the 95 Primary Vehicle Corridors would be impacted under the No Action Alternative; these Primary Vehicle Corridors are listed in **Table 11-7**. Results are mapped in **Figure 11-10** and a full tabular summary is included in Appendix C.

STATE FACILITIES

The No Action Alternative would result in growth in vehicle volume on freeway segments identified in DEIS Section 11.2.5, *State Facilities*. Overall, volume at these study locations is expected to increase under No Action Alternative build-out, generally in the range of 5 to 20 percent. However, volume on I-90 would grow by a smaller amount, and potentially even decrease across the I-90 bridge, with the addition of East Link.

As shown in **Table 11-8**, the study locations along SR 520 and I-90 are expected to operate at LOS D or better under the No Action Alternative, but the three locations along I-405 are all expected to degrade further such that none of them meet the LOS D standard. The locations that would not meet the LOS standard are **shown in bold**. Of the three segments that would not meet the state LOS D standard, two do not currently meet the threshold while the third is on the verge of not meeting LOS D in the existing conditions (0.99).

An impact for the No Action Alternative is defined as any location that does not meet the WSDOT LOS standard. Therefore, the three study locations along I-405 are expected to be impacted under the No Action Alternative: I-405 north of SR 520, I-405 between SR 520 and I-90, and I-405 south of I-90.

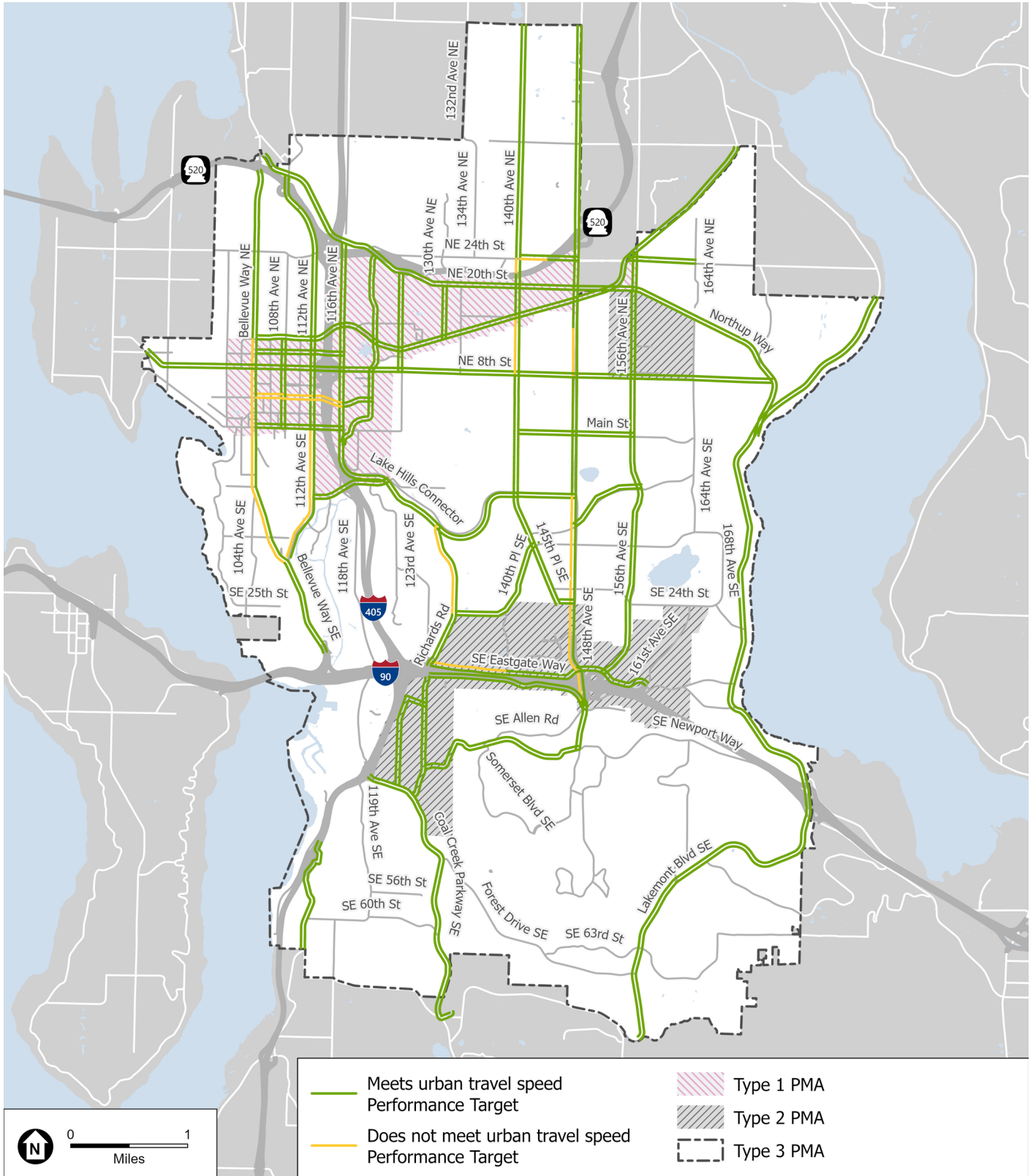
TABLE 11-7 Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – No Action Alternative

Performance Management Area and Performance Target	Corridors Not Meeting Performance Target	Speed (miles per hour)	
		Existing	No Action
Type 1 PMA (Performance target ≥ 0.5 Typical Urban Travel Speed)	Bellevue Way – NE 12th St to Main St (SB/WB)	5	5
	112th Ave SE – Main St to SE 8th St (SB/WB)	7	6
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	5
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	5	5
Type 2 PMA (Performance target ≥ 0.75 Typical Urban Travel Speed)	148th Ave – SE 24th St to SE 37th St (SB/WB)	6	7
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	10
Type 3 PMA (Performance target ≥ 0.9 Typical Urban Travel Speed)	Bellevue Way – Main St to 112th Ave SE (SB/WB)	11	10
	112th Ave SE – SE 8th St to Bellevue Wy (SB/WB)	7	6
	Richards Road – Lk Hills Connector to SE 26th St (SB/WB)	12	11
	140th Ave NE – NE 24th St to SR 520 (SB/WB)	10	10
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	5
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	12
	148th Ave – SE 8th St to SE 24th St (SB/WB)	9	8
NE 24th St – 140th Ave NE to SR 520 (NB/EB)	11	12	

SOURCE: City of Bellevue 2023

EB = east bound; NB = north bound; SB = southbound; WB = westbound.

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.



SOURCE: City of Bellevue 2023

FIGURE 11-10 Primary Vehicle Corridor Travel Speed - No Action Alternative

TABLE 11-8 State Facility Performance –No Action Alternative

Study Location	Existing		No Action Alternative	
	AADT	Volume-to-LOS D Maximum Service Volume Ratio	AADT	Volume-to-LOS D Maximum Service Volume Ratio
I-405 north of SR 520	211,000	0.99	225,000	1.05
I-405 between SR 520 and I-90	205,000	1.07	238,000	1.23
I-405 south of I-90	150,000	1.16	180,000	1.39
SR 520 west of I-405	74,000	0.57	79,000	0.61
SR 520 east of I-405	105,000	0.83	120,000	0.95
I-90 west of I-405	148,000	0.86	145,000	0.84
I-90 east of I-405	152,000	0.71	154,000	0.72

SOURCE: City of Bellevue 2023; Fehr & Peers 2023

WILBURTON STUDY AREA

Primary Vehicle Corridor travel speed and System Intersection V/C ratio results within the Wilburton study area are shown in **Figure 11-11**. The V/C ratio results are summarized in **Table 11-9** and impacted locations are **shown in bold**. As shown in the table, with build-out of the modeled capacity, most System Intersections are expected to operate at a higher V/C ratio relative to existing conditions. However, most locations would still meet the 1.0 performance target for a Type 1 PMA. Under the No Action Alternative, two intersections within the study area would not meet the V/C performance target, constituting an impact:

- 116th Avenue NE & NE 12th Street
- 116th Avenue SE & SE 1st Street

Although not located geographically within the Wilburton study area, three other nearby intersections that provide access between Downtown and Wilburton would not meet the performance target:

- 112th Avenue NE & NE 12th Street
- 112th Avenue NE & NE 10th Street
- 112th Avenue NE & NE 8th Street



SOURCE: City of Bellevue 2023

FIGURE 11-11 Primary Vehicle Corridor System Intersection and Travel Speed Performance – No Action Alternative in the Wilburton Study Area Vicinity

**TABLE 11-9 Wilburton Study Area Vehicle Network Performance
- System Intersections - No Action Alternative**

Intersection	V/C Ratio	
	Existing	No Action
I-405 SB Ramps & NE 4th St	0.60	0.56
116th Ave NE & NE 12th St	0.80	1.32
120th Ave NE & NE 12th St	0.57	0.82
124th Ave NE & Bel-Red Rd	0.82	0.95
Spring Blvd & NE 12th St	0.42	0.54
120th Ave NE & Bel-Red Rd	0.39	0.41
116th Ave NE & NE 8th St	0.73	0.87
116th Ave & Main St	0.65	0.78
116th Ave SE & SE 1st St	0.85	1.15
116th Ave NE & NE 4th St	0.92	1.00
120th Ave NE & NE 8th St	0.62	0.74
116th Ave NE & NE 10th St	0.53	0.70
NE 1st St & Main St	0.49	0.64
120th Ave NE & NE 4th St	0.45	0.50
I-405 NB Ramps & NE 4th St	0.51	0.59
I-405 NB Ramps & NE 10th St	0.47	0.64
124th Ave NE & NE 8th St	0.53	0.79
116th Ave NE & NE 6th St	N/A	0.74

SOURCE: City of Bellevue 2023

NOTE: All System Intersections within the Wilburton study area have a 1.0 performance target except for 124th Avenue NE/NE 8th Street, which has a 0.85 performance target.

One corridor that connects Downtown and the Wilburton study area across I-405 would not meet the travel speed performance target under the No Action Alternative:

- NE 4th Street from 108th Avenue NE to 116th Avenue NE

These locations are all considered impacted under the No Action Alternative.

11.2.5 Alternative 1

This section summarizes the model results for Alternative 1 and the impacts expected based on the thresholds of significance stated in Section 11.2.2, *Thresholds of Significance*.

MODE SHARE

Table 11-10 summarizes the mode share projected under Alternative 1 in comparison to the No Action Alternative. Mode share is expected to be similar between these two alternatives, particularly the bicycle mode. However, slight differences in mode share are expected among walking, driving, and transit, with Alternative 1 expected to have a slightly higher share of workers' trips made by driving (63 percent compared to 60 percent) rather than transit (29 percent compared to 32 percent).

TABLE 11-10 Mode Share - Alternative 1

Mode	Bellevue Workers		Bellevue Residents	
	No Action	Alternative 1	No Action	Alternative 1
Walk	8%	7%	18%	20%
Bicycle	0%	0%	1%	1%
SOV	41%	43%	25%	24%
HOV	19%	20%	44%	43%
Transit	32%	29%	12%	12%

SOURCE: City of Bellevue 2023

NOTE: Mode shares are rounded and may not sum to 100%.

VMT PER CAPITA

Table 11-11 presents the total VMT and VMT per capita under Alternative 1 compared to the No Action Alternative. The BKRCast model projects that total daily VMT would increase to over 5.3 million miles, a 5 percent increase over the No Action Alternative. However, daily VMT per capita is expected to be approximately 10 percent lower at 20.4 miles per day.

TABLE 11-11 VMT and VMT per Capita – Alternative 1

	No Action Alternative	Alternative 1
Daily VMT	5,112,000 miles	5,346,000 miles
Daily VMT per Capita	22.6 miles	20.4 miles

SOURCE: City of Bellevue 2023

Based on the thresholds of significance defined for this EIS, an Action Alternative would result in a significant impact if the VMT per capita is projected to increase by at least 1 percent over the No Action Alternative. Because VMT per capita is expected to decrease relative to the No Action Alternative, **no significant impact on VMT is expected under Alternative 1.**

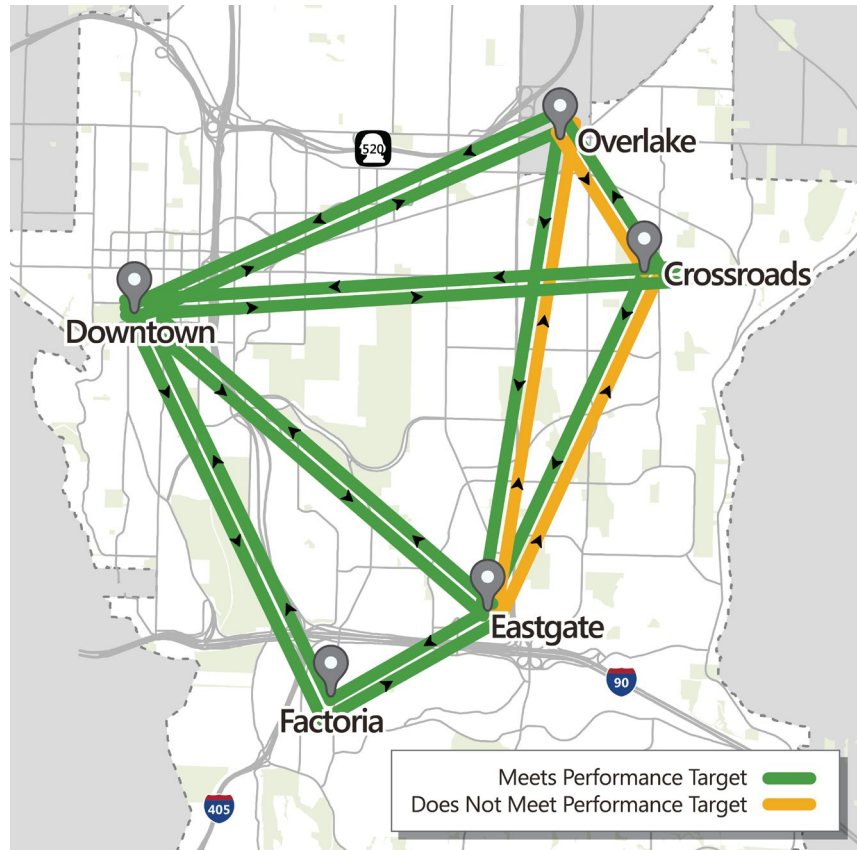
TRANSIT TRAVEL TIME

Table 11-12 and **Figure 11-12** summarize the projected transit travel time results under Alternative 1. The transit travel time ratios that would not meet the performance target are **shown in bold**. Under Alternative 1, transit travel time ratios are expected to stay the same or decrease relative to the No Action Alternative. This indicates that relative to the No Action Alternative, transit would be a more competitive option under Alternative 1. Three Activity Center pairs are expected to not meet the MIP-identified transit travel time ratio of 2.0: Eastgate to Crossroads, Eastgate to Overlake, and Overlake to Crossroads.

TABLE 11-12 Transit Travel Time Ratio – Alternative 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	—	—

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-12 Transit Network Performance – Alternative 1

Based on the threshold of significance defined for this EIS, an Action Alternative would result in a significant impact if it caused an increase in the transit travel time ratio beyond 2.0 for an Activity Center pair that met the MIP performance target under No Action or caused an increase in the travel time ratio by 0.1 or more for any Activity Center pair that would not meet the MIP performance target under No Action. Because the three Activity Center pairs noted above would not meet the target under the No Action Alternative and would not meet the threshold of significance relative to the No Action Alternative, **no significant impact on transit travel time is identified under Alternative 1.**

SYSTEM INTERSECTION VOLUME-TO-CAPACITY RATIO

A summary of intersection V/C ratio results for Alternative 1 is shown in **Table 11-13** and mapped in **Figure 11-13**. The table includes all system intersections that would not meet the performance target under Alternative 1, along with the V/C ratios expected under the No Action Alternative for comparison. A complete tabular summary is included in Appendix C. Under Alternative 1, 103 of 134 System Intersections (77 percent) would meet the target, a decrease of 12 intersections relative the No Action Alternative. Specifically, the number of System Intersections that would not meet the target would decrease to 58 of 75 (77 percent) in Type 1 PMAs and 24 of 36 (67 percent) in the Type 3 PMA. The number of System Intersections that would meet the target in Type 2 PMAs would remain the same between the No Action Alternative and Alternative 1 (21 of 23 System Intersections).

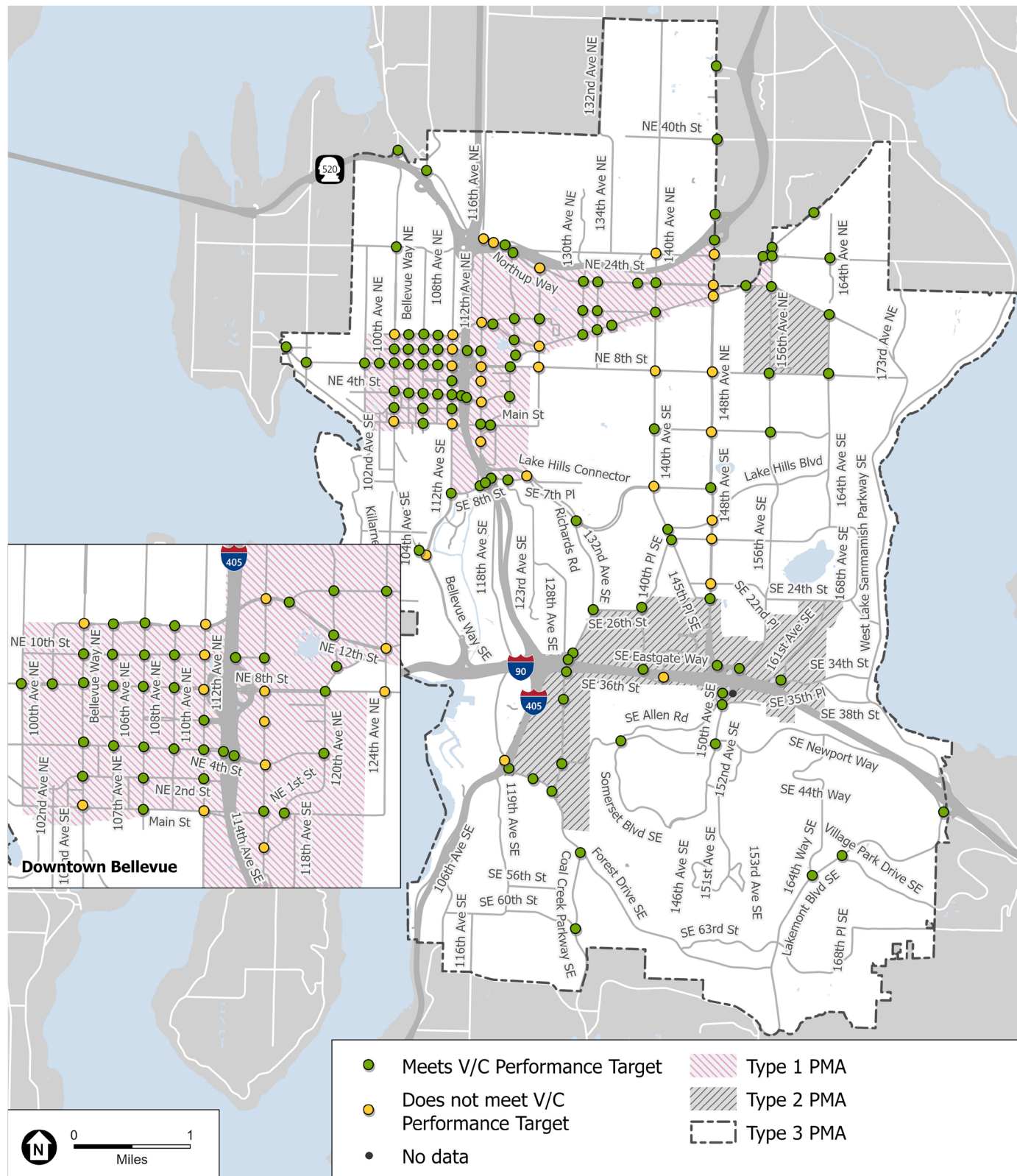
Based on the thresholds of significance defined for this EIS, an Action Alternative results in a significant impact if it causes a System Intersection that meets its performance target under the No Action Alternative to not meet its target or for an intersection that does not meet the performance target under the No Action Alternative, an increase in the V/C ratio by 0.05 or more over No Action. Based on that criteria, **23 System Intersections would be significantly impacted under Alternative 1**. Impacted System Intersections are shown in bold in Table 11-13.

TABLE 11-13 Vehicle Network Performance – System Intersections – Alternative 1

Performance Management Area	Performance Target	% of Intersections Meeting Target	
		No Action	Alternative 1
Type 1 PMA	1.00	88%	77%
Type 2 PMA	0.90	91%	91%
Type 3 PMA	0.85	78%	67%
Total System intersections		86%	77%

Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Alternative 1	V/C Ratio	
		No Action	Alternative 1
Type 1 PMA (Performance Target = 1.00)	Bellevue Wy NE & NE 12th St	1.02	1.02
	Bellevue Wy & Main St	0.99	1.03
	112th Ave NE & NE 12th St	1.05	1.15
	112th Ave NE & NE 8th St	1.23	1.36
	112th Ave & Main St	0.99	1.09
	112th Ave NE & NE 10th St	1.12	1.31
	116th Ave NE & NE 12th St	1.32	1.66
	124th Ave NE & Bel-Red Rd	0.95	1.11
	148th Ave NE & NE 20th St	1.00	1.04
	148th Ave NE & Bel-Red Rd	1.13	1.19
	148th Ave NE & NE 24th St	0.98	1.05
	124th Ave NE & Northup Wy	1.23	1.38
	116th Ave NE & NE 8th St	0.87	1.18
	116th Ave SE & SE 1st St	1.15	1.24
	116th Ave NE & NE 4th St	1.00	1.34
Type 2 PMA (Performance Target = 0.90)	142nd Ave SE & SE 36th St	0.92	0.95
	I-405 SB Ramps & Coal Creek Pkwy	1.13	1.22
Type 3 PMA (Performance Target = 0.85)	112th Ave SE & Bellevue Wy SE	1.00	1.06
	124th Ave NE & NE 8th St	0.79	0.89
	140th Ave SE & NE 8th St	0.81	0.87
	140th Ave SE & SE 8th St	0.87	0.90
	148th Ave NE & NE 8th St	0.96	1.00
	148th Ave & Main St	0.95	0.99
	148th Ave SE & Lk Hills Blvd	0.86	0.88
	148th Ave SE & SE 16th St	0.86	0.88
	140th Ave NE & NE 24th St	0.79	0.86
	116th Ave NE & Northup Wy	0.79	0.89
115th Pl NE & Northup Wy	1.00	1.01	
	148th Ave SE & SE 22nd St	0.86	0.94

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-13 System Intersection Performance - Alternative 1

PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

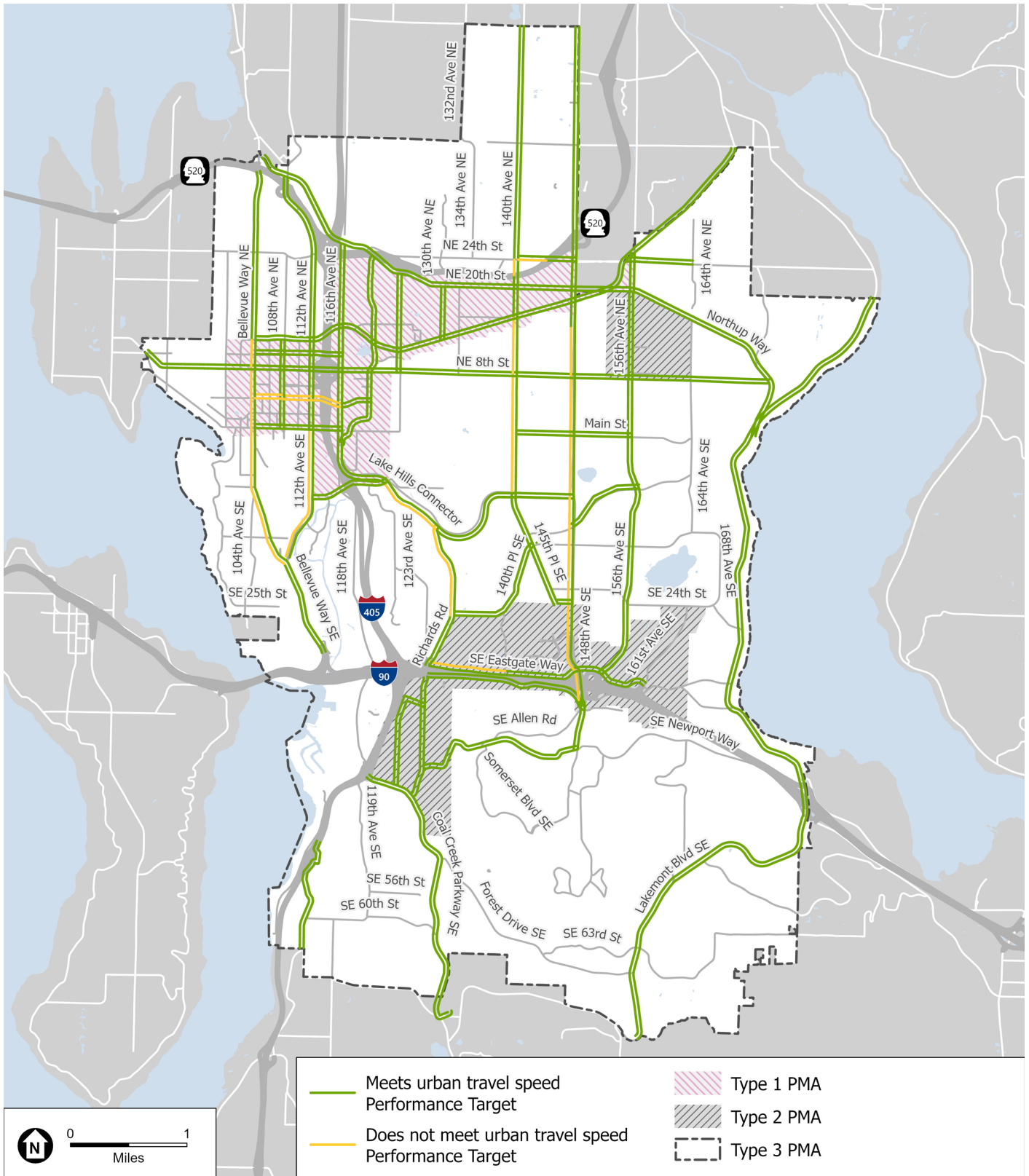
The BKRCast travel demand model was used to forecast vehicle corridor speed along Primary Vehicle Corridors under Alternative 1. Corridor travel speed considers the PM peak hour travel on an urban arterial and takes into account stopping at traffic signals and general traffic volume. Results are shown in **Figure 11-14** and **Table 11-14**. The table lists the corridors that would not meet the performance target under Alternative 1, along with the speed under both the No Action Alternative and Alternative 1 for comparison. A full tabular summary is included in Appendix C.

The 14 locations that would not meet the performance target under the No Action Alternative would also not meet the target under Alternative 1. Three additional corridors would not meet the performance targets under Alternative 1, as compared to the No Action Alternative. Those include 116th Avenue NE/Lake Hills Connector between SE 8th Street and Richards Road, 140th Avenue between NE 8th Street and SE 8th Street, and 148th Avenue between NE 8th Street and SE 8th Street. Therefore, in total, 17 of the 95 Primary Vehicle Corridors would not meet the performance target under Alternative 1.

Based on the threshold of significance defined in this EIS, an Action Alternative results in a significant impact if it would cause a Primary Vehicle Corridor that met the performance target under No Action to not meet the target or for a corridor that does not meet the performance target, a reduction in the travel speed/Typical Urban Travel Speed ratio by 0.05 or more below No Action. Using this criteria, Alternative 1 would significantly impact five corridors (also **shown in bold** in Table 11-14):

- 112th Avenue SE from Main Street to SE 8th Street
- 116th Avenue NE/Lake Hills Connector from Richards Road to SE 8th Street
- Richards Road from Lake Hills Connector to SE 26th Street
- 140th Avenue from NE 8th Street to SE 8th Street
- 148th Avenue from NE 8th Street to SE 8th Street

On two segments, the locations would meet the performance target in the No Action Alternative, but the travel speed-to-Typical Urban Travel Speed ratio would degrade by 0.05 or more. On the other three segments, the locations would meet the performance target under the No Action Alternative, but not under Alternative 1. Therefore, **travel speed on these corridors is considered significantly impacted under Alternative 1.**



SOURCE: City of Bellevue 2023

FIGURE 11-14 Primary Vehicle Corridor Travel Speed – Alternative 1

TABLE 11-14 Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 1

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target	Speed (miles per hour)	
		No Action	Alt 1
Type 1 PMA (Performance target ≥ 0.5 Typical Urban Travel Speed)	Bellevue Wy – NE 12th St to Main St (SB/WB)	5	5
	112th Ave SE – Main St to SE 8th St (SB/WB)	6	5
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	5
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	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	6
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	9
Type 3 PMA (Performance target ≥ 0.9 Typical Urban Travel Speed)	Bellevue Way – Main St to 112th Ave SE (SB/WB)	10	9
	112th Ave SE – SE 8th St to Bellevue Wy (SB/WB)	6	6
	116th Ave NE/Lk Hills Connector – SE 8th St to Richards Rd (SB/WB)	14	12
	Richards Rd – Lk Hills Connector to SE 26th St (SB/WB)	11	11
	140th Ave NE – NE 24th St to SR 520 (SB/WB)	10	10
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	5
	140th Ave – NE 8th St to SE 8th St (SB/WB)	11	10
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	11
	148th Ave – NE 8th St to SE 8th St (SB/WB)	14	12
148th Ave – SE 8th St to SE 24th St (SB/WB)	8	8	
NE 24th St – 140th Ave NE to SR 520 (NB/EB)	12	12	

SOURCE: City of Bellevue 2023

EB = east bound; NB = north bound; SB = southbound; WB = westbound.

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.

STATE FACILITIES

Table 11-15 summarizes projected daily volume at each of the state facility study locations under Alternative 1. As is the case under the No Action Alternative, the three study locations along I-405 are expected to exceed the volume needed to maintain a LOS D standard and would also operate slightly worse than under the No Action Alternative. Three other study locations would continue to meet the WSDOT standard, but SR 520 east of I-405 would slightly exceed the LOS D service volume.

TABLE 11-15 State Facility Performance – Alternative 1

Study Location	No Action Alternative		Alternative 1	
	AADT	Volume-to-LOS D Maximum Service Volume Ratio	AADT	Volume-to-LOS D Maximum Service Volume Ratio
I-405 north of SR 520	225,000	1.05	230,000	1.08
I-405 between SR 520 and I-90	238,000	1.23	240,000	1.25
I-405 south of I-90	180,000	1.39	184,000	1.42
SR 520 west of I-405	79,000	0.61	86,000	0.67
SR 520 east of I-405	120,000	0.95	127,000	1.00
I-90 west of I-405	145,000	0.84	146,000	0.85
I-90 east of I-405	154,000	0.72	157,000	0.74

SOURCE: Fehr & Peers 2023

The impact criteria defined for this EIS state that an Action Alternative results in a significant impact on a state facility if it would cause a study location that meets the WSDOT standard under the No Action Alternative to not meet the standard, or cause an increase in state facility volume-to-capacity ratio of 0.01 or more for a location that would not meet the LOS standard under the No Action Alternative.

Based on these criteria, the **three study segments** of I-405 (I-405 north of SR 520, I-405 between SR 520 and I-90, and I-405 south of I-90) and SR 520 east of I-405 **would be significantly impacted** by Alternative 1.

WILBURTON STUDY AREA

Primary Vehicle Corridor travel speed and intersection V/C ratio results within the Wilburton study area are shown in **Figure 11-15**. V/C ratio results are summarized in **Table 11-16** and impacted locations are **shown in bold**. Relative to the No Action Alternative, five additional intersections are expected to not meet the V/C performance target in the Wilburton study area under Alternative 1. Along 116th Avenue NE, the intersections at NE 8th Street, NE 4th Street, and NE 6th Street would not meet the performance target. On the northeast corner of the study area along 124th Avenue NE, the intersections at Bel-Red Road and at NE 8th St would also not meet the performance target under Alternative 1. West of the Wilburton study area, Alternative 1 would also result in an additional System Intersection at 112th Avenue NE/Main Street to not meet the target.

Seven System Intersections would result in V/C ratios that constitute significant impacts:

- 116th Avenue NE & NE 12th Street
- 124th Avenue NE & Bel-Red Road
- 116th Avenue NE & NE 8th Street
- 116th Avenue NE & SE 1st Street
- 116th Avenue NE & NE 4th Street
- 124th Avenue NE & NE 8th Street
- 116th Avenue NE & NE 6th Street

As is the case under the No Action Alternative, NE 4th Street west of 116th Avenue NE would not meet the travel speed performance target; however, it would not constitute a significant impact under Alternative 1.



SOURCE: City of Bellevue 2023

FIGURE 11-15 Primary Vehicle Corridor System Intersection and Speed Performance – Alternative 1 in the Wilburton Study Area Vicinity

**TABLE 11-16 Wilburton Study Area Vehicle Network Performance
– System Intersections – Alternative 1**

Intersection	V/C Ratio	
	No Action	Alternative 1
I-405 SB Ramps & NE 4th St	0.56	0.62
116th Ave NE & NE 12th St	1.32	1.66
120th Ave NE & NE 12th St	0.82	0.86
124th Ave NE & Bel-Red Rd	0.95	1.11
Spring Blvd & NE 12th St	0.54	0.67
120th Ave NE & Bel-Red Rd	0.41	0.44
116th Ave NE & NE 8th St	0.87	1.18
116th Ave & Main St	0.78	0.90
116th Ave SE & SE 1st St	1.15	1.24
116th Ave NE & NE 4th St	1.00	1.34
120th Ave NE & NE 8th St	0.74	0.94
116th Ave NE & NE 10th St	0.70	0.81
NE 1st St & Main St	0.64	0.94
120th Ave NE & NE 4th St	0.50	0.55
I-405 NB Ramps & NE 4th St	0.59	0.68
I-405 NB Ramps & NE 10th St	0.64	0.81
124th Ave NE & NE 8th St	0.79	0.89
116th Ave NE & NE 6th St	0.74	1.11

SOURCE: City of Bellevue 2023

NOTE: All System Intersections within the Wilburton study area have a 1.0 performance target except for 124th Avenue NE/NE 8th Street, which has a 0.85 performance target.

11.2.6 Alternative 2

This section summarizes the model results for Alternative 2 and the impacts expected based on the thresholds of significance stated in Section 11.2.2, *Thresholds of Significance*.

MODE SHARE

Table 11-17 summarizes the mode share projected under Alternative 2 in comparison to the No Action Alternative. Among Bellevue workers, walk and bike shares are expected to remain the same, driving modes are expected to be slightly higher, and the transit share would be slightly lower (correlating with the magnitude of increase in driving). Among Bellevue residents, the bicycle, SOV, and transit mode shares are expected to be the same between the two alternatives, with a lower HOV share and higher walk share.

TABLE 11-17 Mode Share – Alternative 2

Mode	Bellevue Workers		Bellevue Residents	
	No Action	Alternative 2	No Action	Alternative 2
Walk	8%	8%	18%	19%
Bicycle	0%	0%	1%	1%
SOV	41%	43%	25%	25%
HOV	19%	20%	44%	43%
Transit	32%	29%	12%	12%

SOURCE: City of Bellevue 2023

NOTE: Mode shares are rounded and may not sum to 100%.

VMT PER CAPITA

Table 11-18 presents the total VMT and VMT per capita under Alternative 2 compared to the No Action Alternative. The BKRCast model projects that total daily VMT would increase to nearly 5.5 million miles, a 7 percent increase over the No Action Alternative and slightly higher than Alternative 1. However, daily VMT per capita is expected to be approximately 4 miles, or 18 percent lower than the No Action Alternative at 18.5 miles per day. Alternative 2 daily VMT per capita would also be lower than that projected for Alternative 1.

TABLE 11-18 VMT and VMT per Capita – Alternative 2

	No Action Alternative	Alternative 2
Daily VMT	5,112,000 miles	5,491,000 miles
Daily VMT per Capita	22.6 miles	18.5 miles

SOURCE: City of Bellevue 2023

Because daily VMT per capita is expected to decrease relative to the No Action Alternative, **no significant impact on VMT is expected under Alternative 2.**

TRANSIT TRAVEL TIME

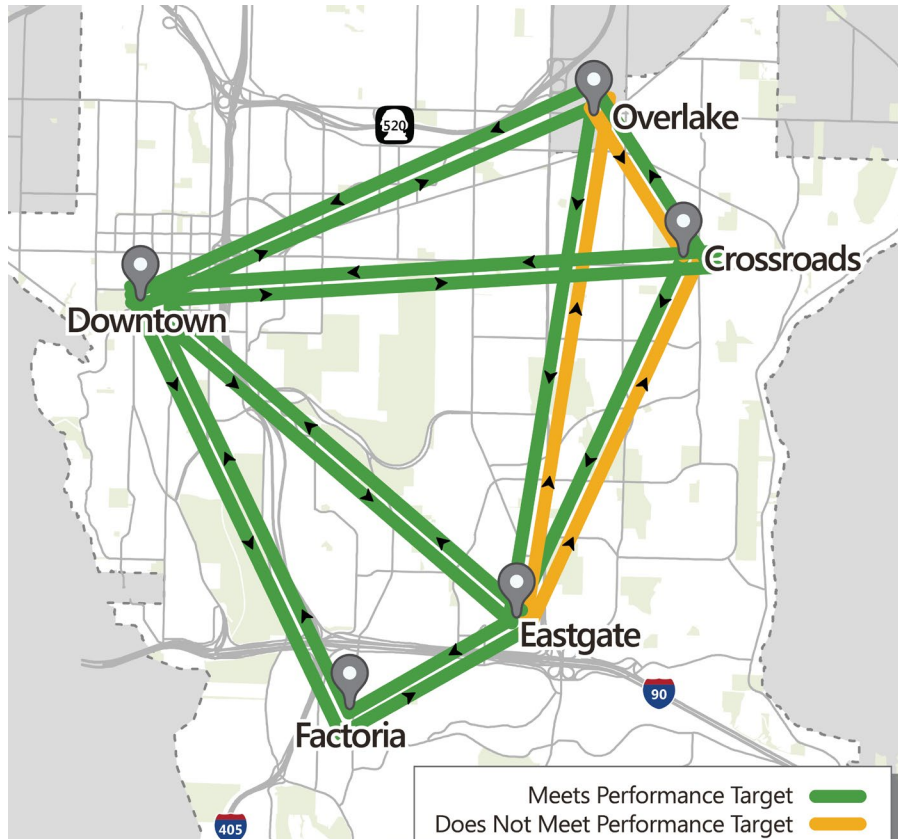
Using the forecasted Primary Vehicle Corridor travel speed for vehicles as well as projected transit travel time, transit travel time ratio was calculated for each Activity Center pair. As shown in **Table 11-19** and **Figure 11-16**, there are three Activity Center pairs that are expected to not meet 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**.

TABLE 11-19 Transit Travel Time Ratio – Alternative 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	—	—

SOURCE: City of Bellevue 2023

Because the three Activity Center pairs noted above would not meet the target under the No Action Alternative and not meet the threshold of significance relative to the No Action Alternative, **no significant impact on transit travel time is identified under Alternative 2.**



SOURCE: City of Bellevue 2023

FIGURE 11-16 Transit Network Performance - Alternative 2

SYSTEM INTERSECTION VOLUME-TO-CAPACITY RATIO

A summary of intersection V/C results for Alternative 2 is shown in **Table 11-20** and mapped in **Figure 11-17**. The table includes all intersections that would not meet the performance target under Alternative 2, along with the V/C ratios expected under the No Action Alternative for comparison. A complete tabular summary is included in Appendix C. Under Alternative 2, the number of System Intersections that would meet the target would fall to 100 of 134 System Intersections (75 percent), a decrease of 15 intersections from the No Action Alternative. Specifically, the number of System Intersections that would meet the target would decrease to 56 of 75 (75 percent) in Type 1 PMAs, and 23 of 36 (64 percent) in the Type 3 PMA. As under the No Action Alternative and Alternative 1, the number of System Intersections that would meet the target in the Type 2 PMA would remain the same (21 intersections).

TABLE 11-20 Vehicle Network Performance – System Intersections – Alternative 2

Performance Management Area	Performance Target	% of Intersections That Meet Target	
		No Action	Alternative 2
Type 1 PMA	1.00	88%	75%
Type 2 PMA	0.90	92%	92%
Type 3 PMA	0.85	78%	64%
Total System intersections		86%	75%
Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Alternative 2	V/C Ratio	
		No Action	Alternative 2
Type 1 PMA (Performance Target = 1.00)	Bellevue Wy NE & NE 12th St	1.02	1.10
	Bellevue Wy & Main St	0.99	1.08
	112th Ave NE & NE 12th St	1.05	1.24
	112th Ave NE & NE 8th St	1.23	1.48
	112th Ave & Main St	0.99	1.14
	112th Ave NE & NE 10th St	1.12	1.43
	116th Ave NE & NE 12th St	1.32	2.03
	124th Ave NE & Bel-Red Rd	0.95	1.16
	140th Ave NE & Bel-Red Rd	0.89	1.02
	148th Ave NE & NE 20th St	1.00	1.06
	148th Ave NE & Bel-Red Rd	1.13	1.26
	148th Ave NE & NE 24th St	0.98	1.08
	124th Ave NE & Northup Wy	1.23	1.46
	116th Ave NE & NE 8th St	0.87	1.22
	118th Ave SE & SE 8th St	0.89	1.06
	116th Ave SE & SE 1st St	1.15	1.24
116th Ave NE & NE 4th St	1.00	1.38	
Lk Hills Connector & SE 7th PI	1.02	1.22	
116th Ave NE & NE 6th St	0.74	1.15	

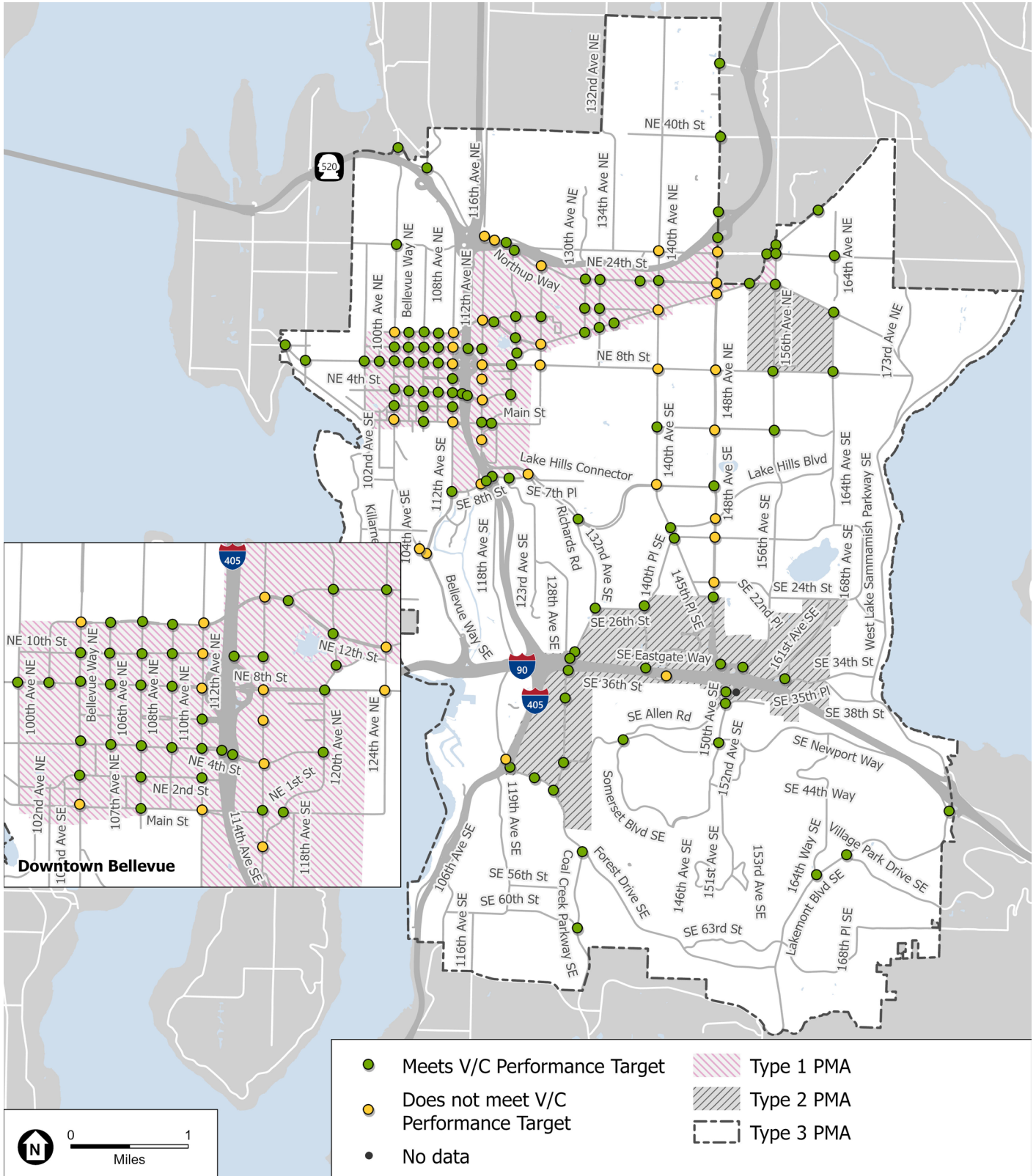
Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Alternative 2	V/C Ratio	
		No Action	Alternative 2
Type 2 PMA (Performance Target = 0.90)	142nd Ave SE & SE 36th St	0.92	0.95
	I-405 SB Ramps & Coal Creek Pkwy	1.13	1.20
Type 3 PMA (Performance Target = 0.85)	112th Ave SE & Bellevue Wy SE	1.00	1.08
	124th Ave NE & NE 8th St	0.79	0.94
	140th Ave NE & NE 8th St	0.81	0.93
	140th Ave SE & SE 8th St	0.87	0.94
	148th Ave NE & NE 8th St	0.96	1.06
	148th Ave & Main St	0.95	1.01
	148th Ave SE & Lk Hills Blvd	0.86	0.87
	148th Ave SE & SE 16th St	0.86	0.90
	140th Ave NE & NE 24th St	0.79	0.96
	116th Ave NE & Northup Wy	0.79	1.00
	115th Pl NE & Northup Wy	1.00	1.08
	148th Ave SE & SE 22nd St	0.86	0.97
	108th Ave SE & Bellevue Way SE	0.79	0.88

SOURCE: City of Bellevue 2023

Based on the impact criteria for Action Alternatives, 31 System Intersections would be significantly impacted under Alternative 2 as listed below. These include the 23 intersections that would be impacted under Alternative 1 as well as the following eight additional locations:

- Bellevue Way NE & NE 12th Street
- 140th Avenue NE & Bel-Red Road
- 118th Avenue SE & SE 8th Street
- 140th Avenue SE & SE 8th Street
- 148th Avenue NE & NE 8th Street
- 148th Avenue NE & Main Street
- 115th Place NE & Northup Way
- 108th Avenue SE & Bellevue Way SE

Impacted System Intersections are **shown in bold** in Table 11-20.



SOURCE: City of Bellevue 2023

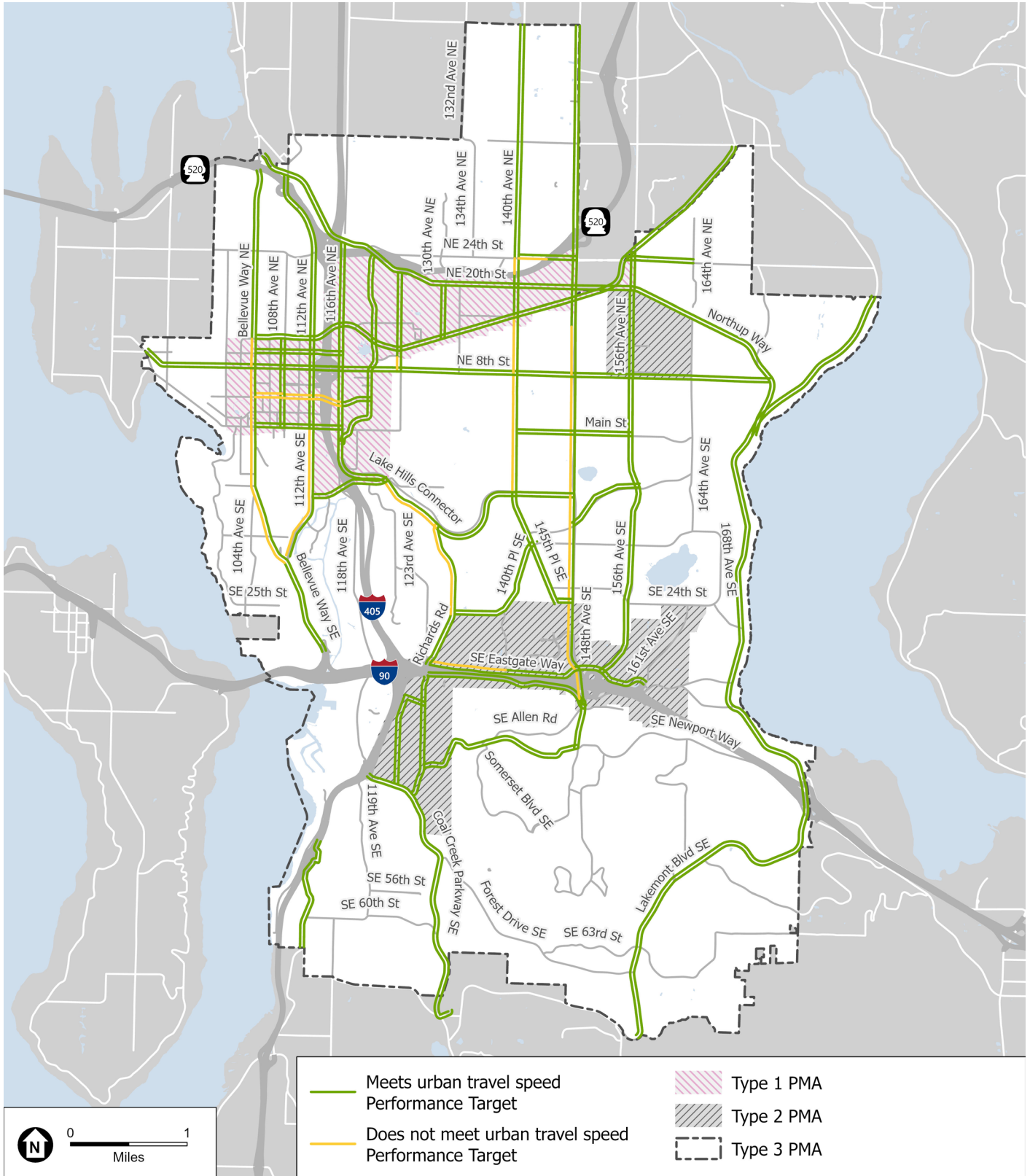
FIGURE 11-17 System Intersection Performance - Alternative 2

PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

Primary Vehicle Corridor travel speed results are shown in **Figure 11-18** and **Table 11-21**. The table lists the corridors that would not meet the performance target under Alternative 2, along with the speed under both the No Action Alternative and Alternative 2 for comparison. A full tabular summary is included in Appendix C. The same 17 locations (of a total of 95 Primary Vehicle Corridors) that would not meet the performance target under Alternative 1 would also not meet the target under Alternative 2. In addition, one more corridor would also not meet the target under Alternative 2: 124th Avenue NE – NE 10th Place to NE 8th Street. Because traffic volume would generally be higher under Alternative 2, the travel speed-to-Typical Urban Travel Speed ratio would degrade to slightly lower levels, resulting in several more impacted corridors than under Alternative 1.

The following 11 Primary Vehicle Corridors would be significantly impacted under Alternative 2:

- Bellevue Way from Main Street to 112th Avenue SE
- 112th Avenue SE from Main Street to SE 8th Street
- Richards Road from Lake Hills Connector to SE 26th Street
- 140th Avenue NE from Bel-Red Road to NE 14th Street
- 140th Avenue NE - NE 14th Street to NE 8th Street
- 148th Avenue from NE 15th Court to NE 8th Street
- NE 24th Street from 140th Avenue NE to SR 520
- 116th Avenue NE/Lake Hills Connector from Richards Road to SE 8th Street
- 124th Avenue NE from NE 10th Place to NE 8th Street
- 140th Avenue from NE 8th Street to SE 8th Street
- 148th Avenue from NE 8th Street to SE 8th Street



SOURCE: City of Bellevue 2023

FIGURE 11-18 Primary Vehicle Corridor Travel Speed – Alternative 2

TABLE 11-21 Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 2

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target	Speed (miles per hour)	
		No Action	Alternative 2
Type 1 PMA (Performance target ≥ 0.5 Typical Urban Travel Speed)	Bellevue Way – NE 12th St to Main St (SB/WB)	5	5
	112th Ave SE – Main St to SE 8th St (SB/WB)	6	4
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	4
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	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	6
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	10
Type 3 PMA (Performance target ≥ 0.9 Typical Urban Travel Speed)	Bellevue Way – Main St to 112th Ave SE (SB/WB)	10	9
	112th Ave SE – SE 8th St to Bellevue Way (SB/WB)	6	6
	116th Ave NE/Lk Hills Connector – SE 8th St to Richards Rd (SB/WB)	14	10
	Richards Rd – Lk Hills Connector to SE 26th St (SB/WB)	11	10
	124th Ave NE – NE 10th Pl to NE 8th St (SB/WB)	14	11
	140th Ave NE – NE 24th St to SR 520 (SB/WB)	10	9
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	4
	140th Ave – NE 8th St to SE 8th St (SB/WB)	11	9
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	10
	148th Ave – NE 8th St to SE 8th St (SB/WB)	14	11
148th Ave – SE 8th St to SE 24th St (SB/WB)	8	8	
NE 24th St – 140th Ave NE to SR 520 (NB/EB)	12	11	

SOURCE: City of Bellevue 2023

NOTES: EB = east bound; NB = north bound; SB = southbound; WB = westbound

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.

STATE FACILITIES

Table 11-22 summarizes projected daily volume at each of the state facility study locations under Alternative 2. Compared to the No Action Alternative and Alternative 1, Alternative 2 would result in the same or slightly higher volume on state facilities. The same I-405 and SR 520 study segments impacted under Alternative 1 would be impacted under Alternative 2.

TABLE 11-22 State Facility Performance – Alternative 2

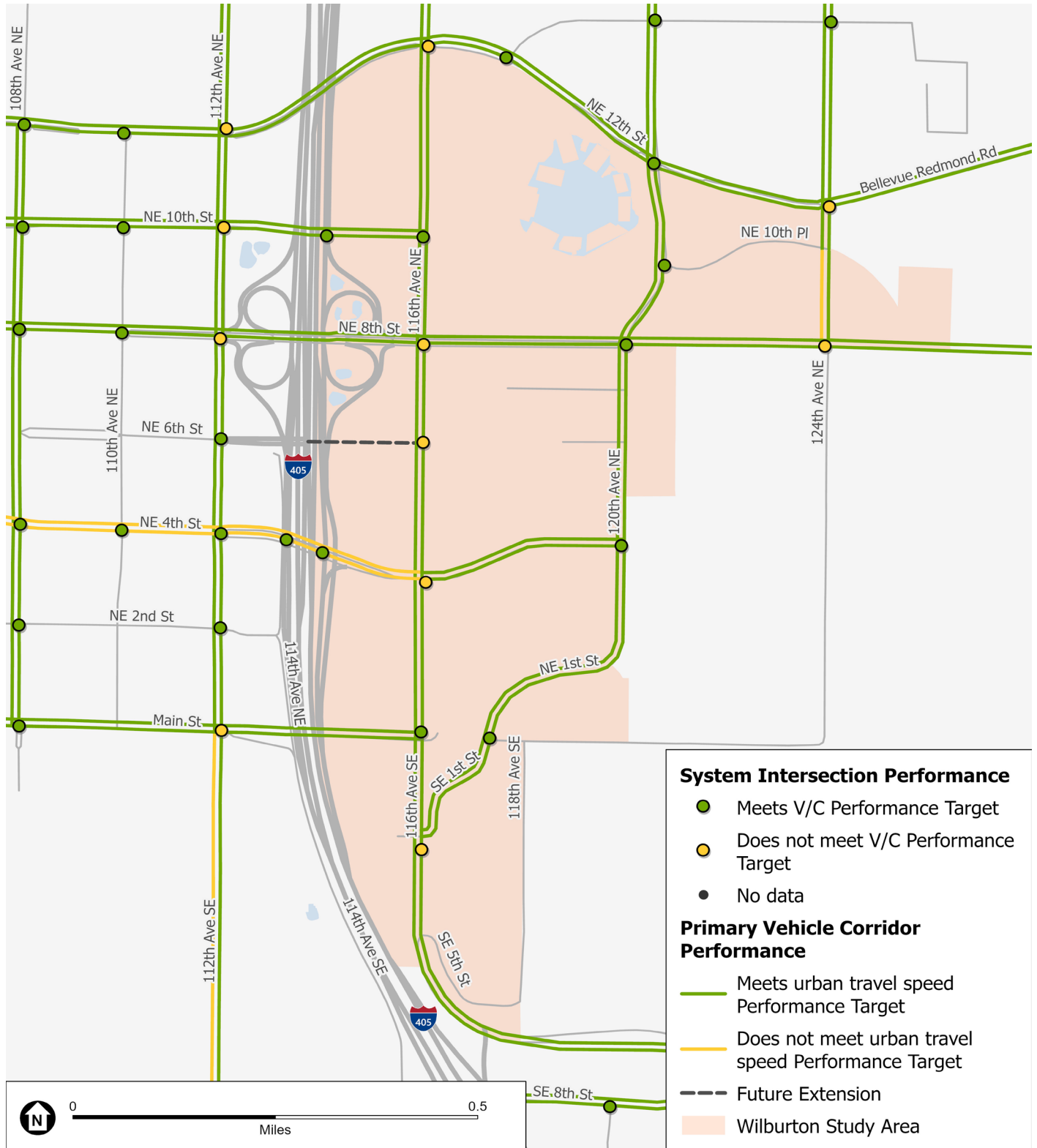
Study Location	No Action Alternative		Alternative 2	
	AADT	Volume-to-LOS D Maximum Service Volume Ratio	AADT	Volume-to-LOS D Maximum Service Volume Ratio
I-405 north of SR 520	225,000	1.05	231,000	1.08
I-405 between SR 520 and I-90	238,000	1.23	242,000	1.26
I-405 south of I-90	180,000	1.39	184,000	1.42
SR 520 west of I-405	79,000	0.61	87,000	0.67
SR 520 east of I-405	120,000	0.95	130,000	1.02
I-90 west of I-405	145,000	0.84	148,000	0.86
I-90 east of I-405	154,000	0.72	160,000	0.75

SOURCE: Fehr & Peers 2023

Based on the impact criteria, four study segments would be significantly impacted by Alternative 2: I-405 north of SR 520, I-405 between SR 520 and I-90, I-405 south of I-90, and SR 520 east of I-405.

WILBURTON STUDY AREA

Primary Vehicle Corridor travel speed and intersection V/C ratio results within the Wilburton study area are shown in **Figure 11-19**. V/C ratio results are summarized in **Table 11-23** and impacted locations are **shown in bold**. The System Intersections that would not meet the performance target would be the same between Alternatives 1 and 2. Although the locations that would not meet the target are expected to be the same under Alternatives 1 and 2, volume under Alternative 2 would generally be higher than under Alternative 1 (and the No Action Alternative), so intersection and corridor operations would reflect additional congestion.



SOURCE: City of Bellevue 2023

FIGURE 11-19 Primary Vehicle Corridor System Intersection and Travel Speed Performance - Alternative 2 in the Wilburton Study Area Vicinity

TABLE 11-23 Wilburton Study Area Vehicle Network Performance – System Intersections – Alternative 2

Intersection	V/C Ratio	
	No Action	Alternative 2
I-405 SB Ramps & NE 4th St	0.56	0.66
116th Ave NE & NE 12th St	1.32	2.03
120th Ave NE & NE 12th St	0.82	0.93
124th Ave NE & Bel-Red Rd	0.95	1.16
Spring Blvd & NE 12th St	0.54	0.70
120th Ave NE & Bel-Red Rd	0.41	0.44
116th Ave NE & NE 8th St	0.87	1.22
116th Ave & Main St	0.78	0.93
116th Ave SE & SE 1st St	1.15	1.24
116th Ave NE & NE 4th St	1.00	1.38
120th Ave NE & NE 8th St	0.74	0.97
116th Ave NE & NE 10th St	0.70	0.90
NE 1st St & Main St	0.64	0.99
120th Ave NE & NE 4th St	0.50	0.56
I-405 NB Ramps & NE 4th St	0.59	0.67
I-405 NB Ramps & NE 10th St	0.64	0.84
124th Ave NE & NE 8th St	0.79	0.94
116th Ave NE & NE 6th St	0.74	1.15

SOURCE: City of Bellevue 2023

NOTE: All System Intersections within the Wilburton study area have a 1.0 performance target except for 124th Avenue NE/NE 8th Street, which has a 0.85 performance target.

Seven System Intersections would result in V/C ratios that constitute significant impacts:

- 116th Avenue NE & NE 12th Street
- 124th Avenue NE & Bel-Red Road
- 116th Avenue NE & NE 8th Street
- 116th Avenue NE & SE 1st Street
- 116th Avenue NE & NE 4th Street

- 124th Avenue NE & NE 8th Street
- 116th Avenue NE & NE 6th Street

The impacted locations would include the planned new NE 6th Street extension intersection with 116th Avenue NE.

Alternative 2 would result in one significant impact to a Primary Vehicle Corridor: 124th Avenue NE between NE 10th Place and NE 8th Street.

11.2.7 Alternative 3

This section summarizes the model results for Alternative 3 and the impacts expected based on the thresholds of significance stated in Section 11.2.2, *Thresholds of Significance*.

MODE SHARE

Table 11-24 summarizes the mode share projected under Alternative 3 in comparison to the No Action Alternative. Similar to Alternative 2, Bellevue workers are expected to have a lower transit mode share and higher driving share than the No Action Alternative. Mode shares among Bellevue residents are expected to remain very similar between the No Action Alternative and Alternative 3.

TABLE 11-24 Mode Share – Alternative 3

Mode	Bellevue Workers		Bellevue Residents	
	No Action	Alternative 3	No Action	Alternative 3
Walk	8%	8%	18%	19%
Bicycle	0%	0%	1%	1%
SOV	41%	43%	25%	25%
HOV	19%	20%	44%	42%
Transit	32%	28%	12%	12%

SOURCE: City of Bellevue 2023

NOTE: Mode shares are rounded and may not sum to 100%.

VMT PER CAPITA

Table 11-25 presents the total VMT and VMT per capita under Alternative 3 compared to the No Action Alternative. The BKRCast model projects that total daily VMT would increase to nearly 5.7 million miles, an 11 percent increase over the No Action Alternative and higher than both Alternatives 1 and 2. Daily VMT per capita is expected to be approximately 5.5 miles, or 24 percent, lower than the No Action Alternative at 17.1 miles per day. Alternative 3 daily VMT per capita would be lower than both Alternatives 1 and 2.

TABLE 11-25 VMT and VMT per Capita – Alternative 3

	No Action Alternative	Alternative 3
Daily VMT	5,112,000 miles	5,680,000 miles
Daily VMT per Capita	22.6 miles	17.1 miles

SOURCE: City of Bellevue 2023

Because daily VMT per capita is expected to decrease relative to the No Action Alternative, **no significant impact on VMT is expected under Alternative 3.**

TRANSIT TRAVEL TIME

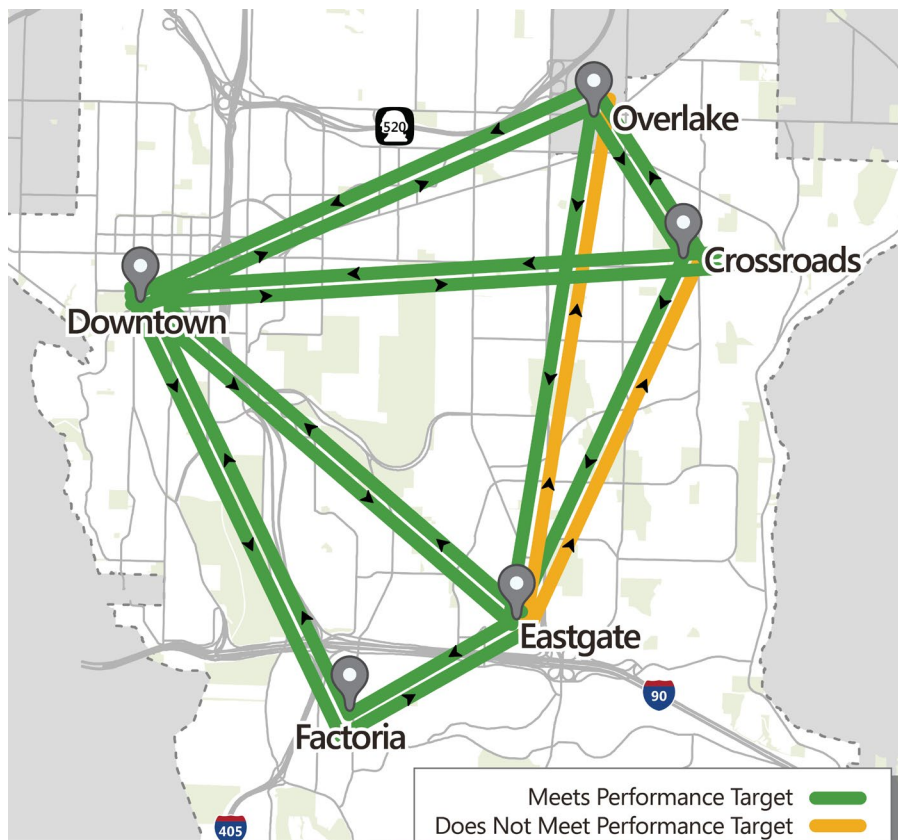
As shown in **Table 11-26** and **Figure 11-20**, two Activity Center pairs are expected to not meet the MIP transit travel time ratio target of 2.0: Eastgate to Crossroads and Eastgate to Overlake. The Overlake to Crossroads activity center pair is expected to operate at the 2.0 target. As was the case for Alternatives 1 and 2, the transit travel time ratios are expected to be lower than under the No Action Alternative, meaning that transit would be a more competitive option. The transit travel time ratios that would not meet the performance target are **shown in bold.**

Because the two Activity Center pairs noted above would not meet the target under the No Action Alternative and would not meet the threshold of significance relative to the No Action Alternative, **no significant impact on transit travel time is identified under Alternative 3.**

TABLE 11-26 Transit Travel Time Ratio - Alternative 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	—	—

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-20 Transit Network Performance - Alternative 3

SYSTEM INTERSECTION VOLUME-TO-CAPACITY RATIO

A summary of intersection V/C results for Alternative 3 is shown in **Table 11-27** and mapped in **Figure 11-21**. The table includes all intersections that would not meet the performance target under Alternative 3, along with the V/C ratios expected under the No Action Alternative for comparison. A complete tabular summary is included in Appendix C.

Under Alternative 3, the number of System Intersections that would meet the target would fall to 89 of 134 (66 percent), a decrease of 26 intersections from the No Action Alternative. Specifically, the number of System Intersections that would meet the target would decrease to 49 of 75 (65 percent) in Type 1 PMAs, 19 of 23 (83 percent) in Type 2 PMAs, and 21 of 36 (58 percent) in the Type 3 PMA.

Based on the impact criteria for Action Alternatives, 43 System Intersections would be significantly impacted under Alternative 3. These include all the intersections impacted under Alternatives 1 and 2 as well as additional locations (20 additional locations relative to Alternative 1 and 12 additional locations relative to Alternative 2). The additional 12 locations that would be impacted under Alternative 3 include:

- 100th Avenue NE & NE 8th Street
- 110th Avenue NE & NE 8th Street
- 156th Avenue NE & NE 24th Street
- 130th Avenue NE & Northup Way
- 132nd Avenue NE & Bel-Red Road
- 120th Avenue NE & NE 8th Street
- NE 1st Street & Main Street
- 142nd Avenue SE & SE 36th Street
- Richards Road & SE 26th Street (Kamber Road)
- Factoria Boulevard SE & SE 36th Street (I-90 EB off-ramp)
- 148th Avenue SE & SE 8th Street
- Richards Road & Lake Hills Connector

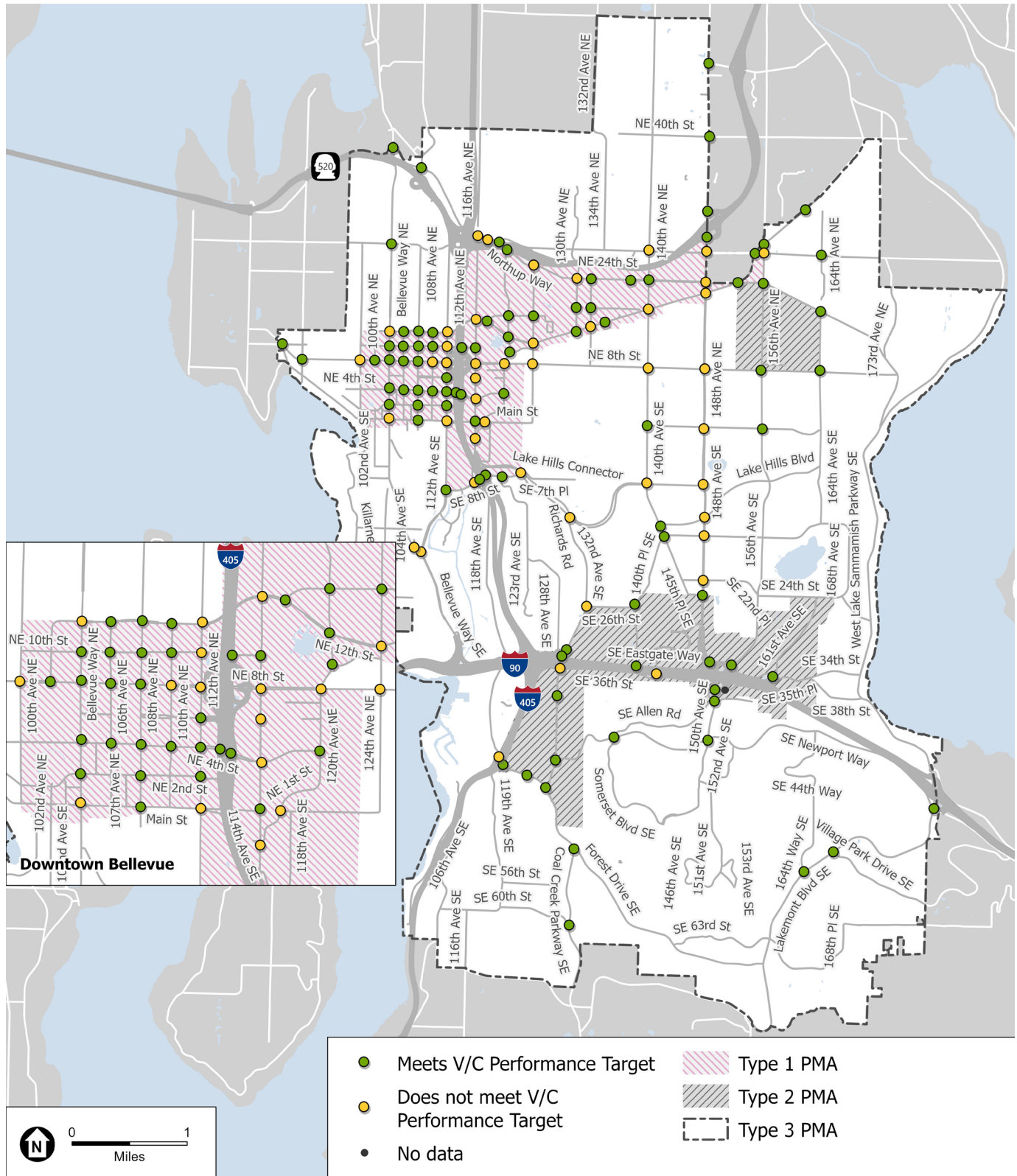
Impacted System Intersections are **shown in bold** in Table 11-27.

TABLE 11-27 Vehicle Network Performance – System Intersections – Alternative 3

Performance Management Area	Performance Target (V/C)	% of Intersections That Would Meet Target	
		No Action	Alternative 3
Type 1 PMA	1.00	88%	65%
Type 2 PMA	0.90	91%	83%
Type 3 PMA	0.85	78%	58%
Total System intersections		86%	66%
Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Alternative 3	% of Intersections That Would Meet Target	
		No Action	Alternative 3
Type 1 PMA (Performance Target V/C = 1.00)	100th Ave NE & NE 8th St	0.97	1.01
	Bellevue Wy NE & NE 12th St	1.02	1.13
	Bellevue Wy & Main St	0.99	1.08
	112th Ave NE & NE 12th St	1.05	1.31
	112th Ave NE & NE 8th St	1.23	1.50
	112th Ave & Main St	0.99	1.19
	110th Ave NE & NE 8th St	0.94	1.03
	112th Ave NE & NE 10th St	1.12	1.46
	116th Ave NE & NE 12th St	1.32	2.12
	124th Ave NE & Bel-Red Rd	0.95	1.30
	140th Ave NE & Bel-Red Rd	0.89	1.15
	148th Ave NE & NE 20th St	1.00	1.11
	148th Ave NE & Bel-Red Rd	1.13	1.30
	156th Ave NE & NE 24th St	0.87	1.02
	130th Ave NE & Northup Wy	0.76	1.04
	148th Ave NE & NE 24th St	0.98	1.16
	124th Ave NE & Northup Wy	1.23	1.56
	132nd Ave NE & Bel-Red Rd	0.88	1.10
116th Ave NE & NE 8th St	0.87	1.29	
118th Ave SE & SE 8th St	0.89	1.06	
116th Ave SE & SE 1st St	1.15	1.29	
120th Ave NE & NE 8th St	0.74	1.04	

Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Alternative 3	% of Intersections That Would Meet Target	
		No Action	Alternative 3
	116th Ave NE & NE 4th St	1.00	1.48
	NE 1st St & Main St	0.64	1.04
	Lk Hills Connector & SE 7th Pl	1.02	1.27
	116th Ave NE & NE 6th St	0.74	1.19
Type 2 PMA (Performance Target V/C = 0.90)	142nd Ave SE & SE 36th St	0.92	1.06
	Richards Rd & SE 26th St (Kamber Rd)	0.77	0.91
	Factoria Blvd SE & SE 36th St (I-90 EB Off-ramp)	0.81	0.96
	I-405 SB Ramps & Coal Creek Pkwy	1.13	1.25
Type 3 PMA (Performance Target V/C = 0.85)	112th Ave SE & Bellevue Wy SE	1.00	1.08
	124th Ave NE & NE 8th St	0.79	0.97
	140th Ave NE & NE 8th St	0.81	1.00
	140th Ave SE & SE 8th St	0.87	1.01
	148th Ave NE & NE 8th St	0.96	1.12
	148th Ave & Main St	0.95	1.04
	148th Ave SE & Lake Hills Blvd	0.86	0.86
	148th Ave SE & SE 16th St	0.86	0.90
	140th Ave NE & NE 24th St	0.79	1.07
	148th Ave SE & SE 8th St	0.78	0.90
	116th Ave NE & Northup Wy	0.79	1.02
	115th Pl NE & Northup Wy	1.00	1.15
	Richards Rd & Lake Hills Connector	0.69	0.88
	148th Ave SE & SE 22nd St	0.86	1.03
	108th Ave SE & Bellevue Way SE	0.79	0.91

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-21 System Intersection Performance - Alternative 3

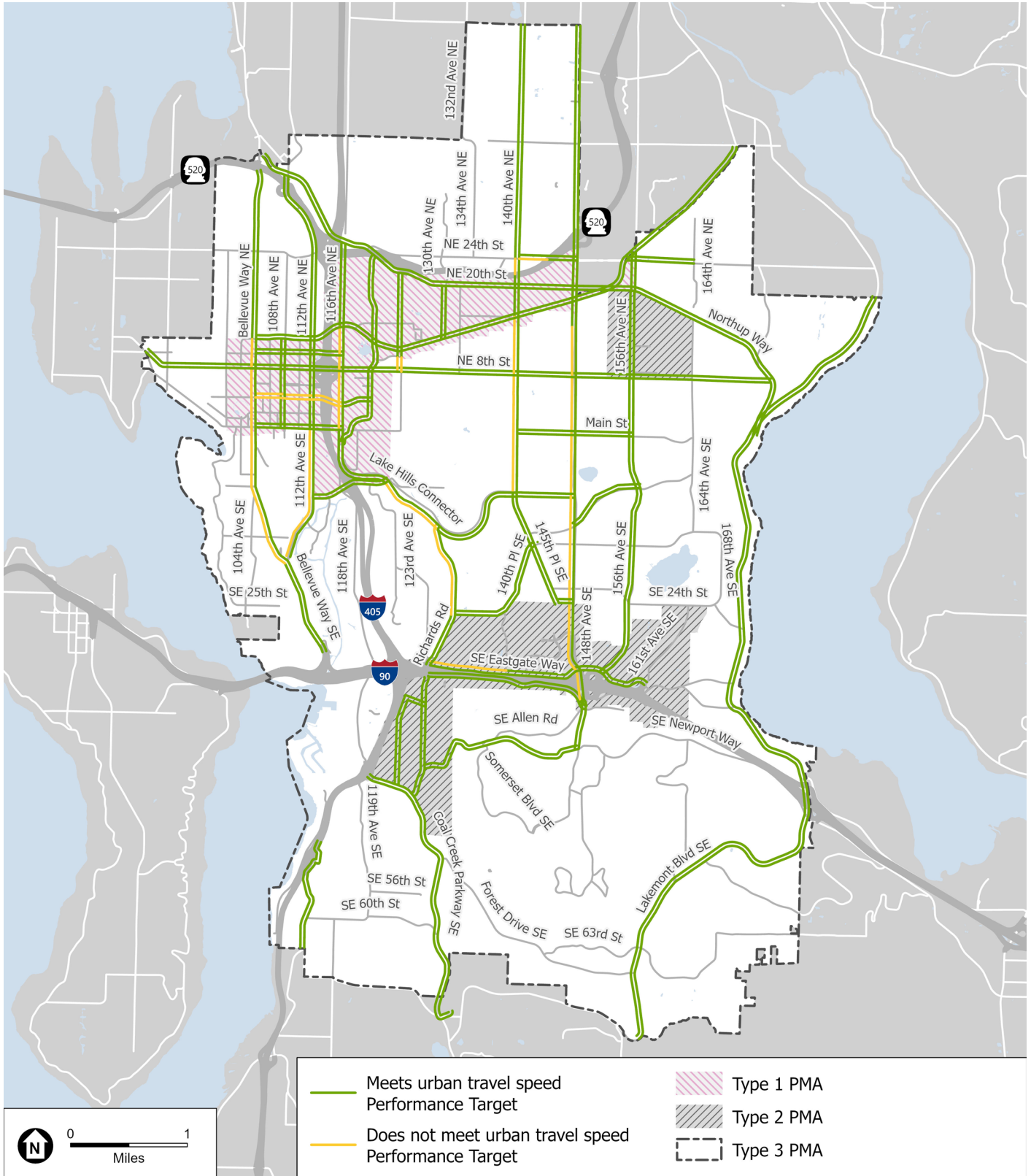
PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

Primary Vehicle Corridor travel speed results are shown in **Figure 11-22** and **Table 11-28**. The table lists the corridors that would not meet the performance target under Alternative 3, along with the speed under both the No Action Alternative and Alternative 3 for comparison. A full tabular summary is included in Appendix C.

The 18 corridors that would not meet the performance target under Alternative 2 would also not meet the target under Alternative 3. In addition, 116th Avenue NE from NE 12th Street to Main Street would also not meet the performance target under Alternative 3. Therefore, in total, 19 of the 95 Primary Vehicle Corridors would not meet the performance target under Alternative 3. Because traffic volume is expected to be higher under Alternative 3 than Alternatives 1 and 2, corridor speed is expected to be lower than those alternatives.

The following 13 Primary Vehicle Corridors (**shown in bold** in Table 11-28) would be significantly impacted under Alternative 3.

- Bellevue Way from Main Street to 112th Avenue SE
- 112th Avenue SE from Main Street to SE 8th Street
- Richards Road from Lake Hills Connector to SE 26th Street
- 140th Avenue NE - 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 from NE 15th Court to NE 8th Street
- 116th Avenue NE/Lake Hills Connector from Richards Road to SE 8th Street
- 116th Avenue NE from NE 12th Street to Main Street
- 124th Avenue NE from NE 10th Place to NE 8th Street
- 140th Avenue from NE 8th Street to SE 8th Street
- 148th Avenue from NE 8th Street to SE 8th Street
- NE 24th Street from 140th Avenue NE to SR 520



SOURCE: City of Bellevue 2023

FIGURE 11-22 Primary Vehicle Corridor Travel Speed – Alternative 3

TABLE 11-28 Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Alternative 3

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target	Speed (miles per hour)	
		No Action	Alternative 3
Type 1 PMA (Performance target ≥ 0.5 Typical Urban Travel Speed)	Bellevue Way – NE 12th St to Main St (SB/WB)	5	5
	112th Ave SE – Main St to SE 8th St (SB/WB)	6	4
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	4
	116th Ave NE – NE 12th St to Main St (SB/WB)	8	6
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	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	6
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	9
Type 3 PMA (Performance target ≥ 0.9 Typical Urban Travel Speed)	Bellevue Way – Main St to 112th Ave SE (SB/WB)	10	9
	112th Ave SE – SE 8th St to Bellevue Way (SB/WB)	6	6
	116th Ave NE/Lk Hills Connector – SE 8th St to Richards Rd (SB/WB)	14	10
	Richards Rd – Lk Hills Connector to SE 26th St (SB/WB)	11	10
	140th Ave NE – NE 24th St to SR 520 (SB/WB)	10	9
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	4
	140th Ave – NE 8th St to SE 8th St (SB/WB)	11	8
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	10
	148th Ave – NE 8th St to SE 8th St (SB/WB)	14	10
	148th Ave – SE 8th St to SE 24th St (SB/WB)	8	8
NE 24th St – 140th Ave NE to SR 520 (NB/EB)	12	10	
124th Ave NE – NE 10th Pl to NE 8th St (NB/EB and SB/WB)	14	8 NB / 10 SB	

SOURCE: City of Bellevue 2023

EB = east bound; NB = north bound; SB = southbound; WB = westbound.

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.

STATE FACILITIES

Table 11-29 summarizes projected daily volume at each of the state facility study locations under Alternative 3. Alternative 3 would result in higher volume on state facilities than Alternatives 1 and 2. The four study segments that would not meet the LOS D standard under Alternatives 1 and 2 would also not meet the standard under Alternative 3 and at slightly higher volumes.

TABLE 11-29 State Facility Performance – Alternative 3

Study Location	No Action Alternative		Alternative 3	
	AADT	Volume-to-LOS D Maximum Service Volume Ratio	AADT	Volume-to-LOS D Maximum Service Volume Ratio
I-405 north of SR 520	225,000	1.05	234,000	1.10
I-405 between SR 520 and I-90	238,000	1.23	245,000	1.27
I-405 south of I-90	180,000	1.39	187,000	1.44
SR 520 west of I-405	79,000	0.61	91,000	0.70
SR 520 east of I-405	120,000	0.95	133,000	1.05
I-90 west of I-405	145,000	0.84	151,000	0.87
I-90 east of I-405	154,000	0.72	161,000	0.76

SOURCE: Fehr & Peers 2023

Based on the impact criteria, **four study segments would be significantly impacted by Alternative 3**: I-405 north of SR 520, I-405 between SR 520 and I-90, I-405 south of I-90, and SR 520 east of I-405.

WILBURTON STUDY AREA

Alternative 3 would include a greater capacity for growth in the Wilburton study area than Alternatives 1 and 2. Therefore, it is projected to result in higher vehicle volume than the No Action Alternative and Alternatives 1 and 2. Alternative 3 was evaluated using two different networks in the Wilburton study area:

- **Alternative 3:** NE 6th Street extension built to 116th Avenue NE (consistent with the assumptions for the other future year alternatives).

- **Alternative 3A:** NE 6th Street extension built as a 5-lane arterial between 116th Avenue NE and 120th Avenue NE with an at-grade intersection at 116th Avenue NE and with Eastrail.

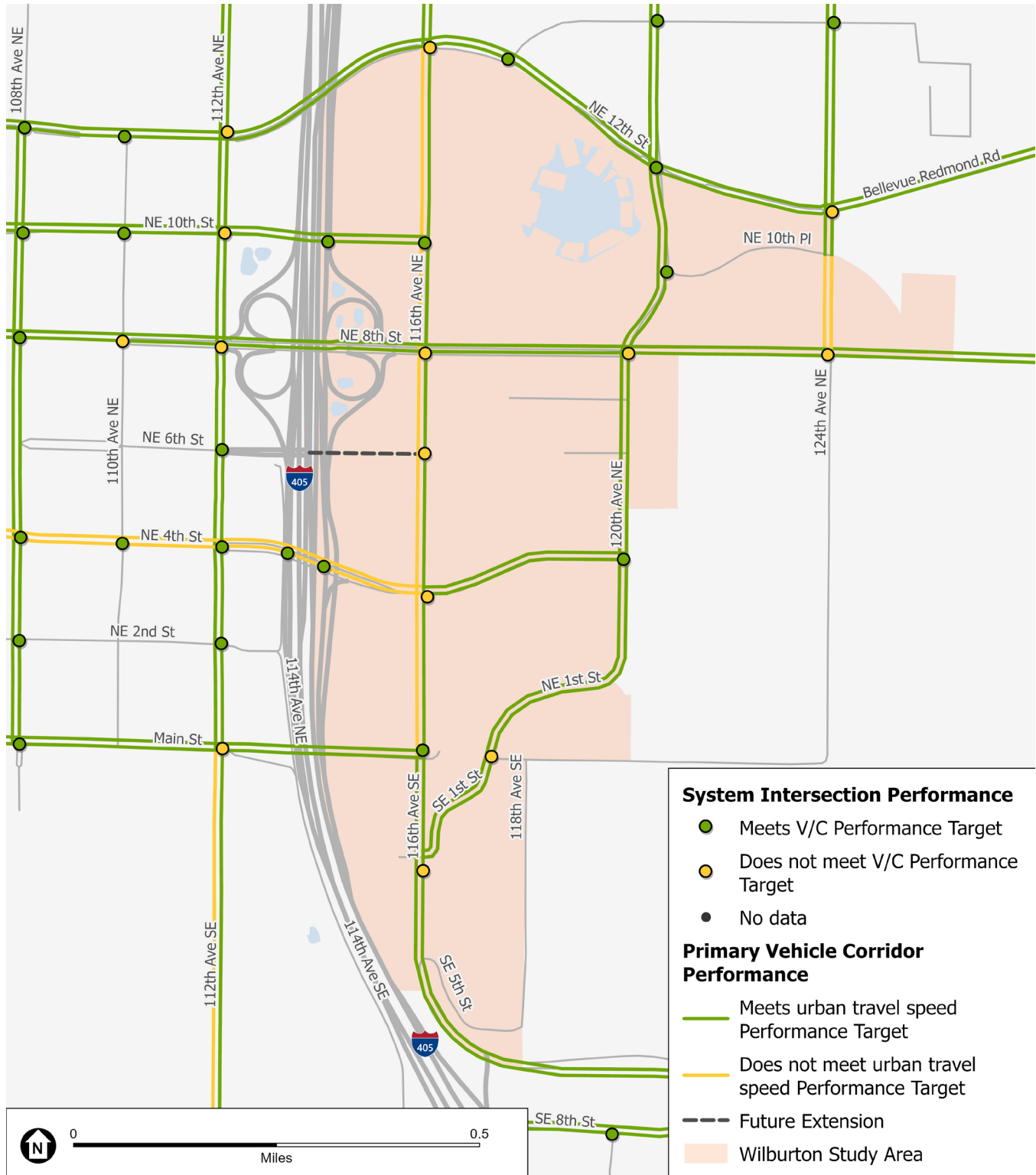
Primary Vehicle Corridor travel speed and System Intersection V/C ratio results within the Wilburton study area are shown in **Figure 11-23** for Alternative 3 and **Figure 11-24** for Alternative 3A. V/C ratio results for both Alternatives 3 and 3A are summarized in **Table 11-30**, and impacted locations are **shown in bold**.

TABLE 11-30 Wilburton Study Area Vehicle Network Performance – System Intersections – Alternatives 3 and 3A

Intersection	V/C Ratio		
	No Action	Alt 3	Alt 3A
I-405 SB Ramps & NE 4th St	0.56	0.66	0.66
116th Ave NE & NE 12th St	1.32	2.12	2.09
120th Ave NE & NE 12th St	0.82	0.96	0.97
124th Ave NE & Bel-Red Rd	0.95	1.30	1.28
Spring Blvd & NE 12th St	0.54	0.78	0.77
120th Ave NE & Bel-Red Rd	0.41	0.51	0.50
116th Ave NE & NE 8th St	0.87	1.29	1.48
116th Ave & Main St	0.78	0.98	0.98
116th Ave SE & SE 1st St	1.15	1.29	1.27
116th Ave NE & NE 4th St	1.00	1.48	1.46
120th Ave NE & NE 8th St	0.74	1.04	0.97
116th Ave NE & NE 10th St	0.70	0.90	0.90
NE 1st St & Main St	0.64	1.04	0.99
120th Ave NE & NE 4th St	0.50	0.61	0.66
I-405 NB Ramps & NE 4th St	0.59	0.70	0.71
I-405 NB Ramps & NE 10th St	0.64	0.85	0.86
124th Ave NE & NE 8th St	0.79	0.97	1.00
116th Ave NE & NE 6th St	0.74	1.19	1.24
120th Ave NE & NE 6th St	N/A	N/A	1.04

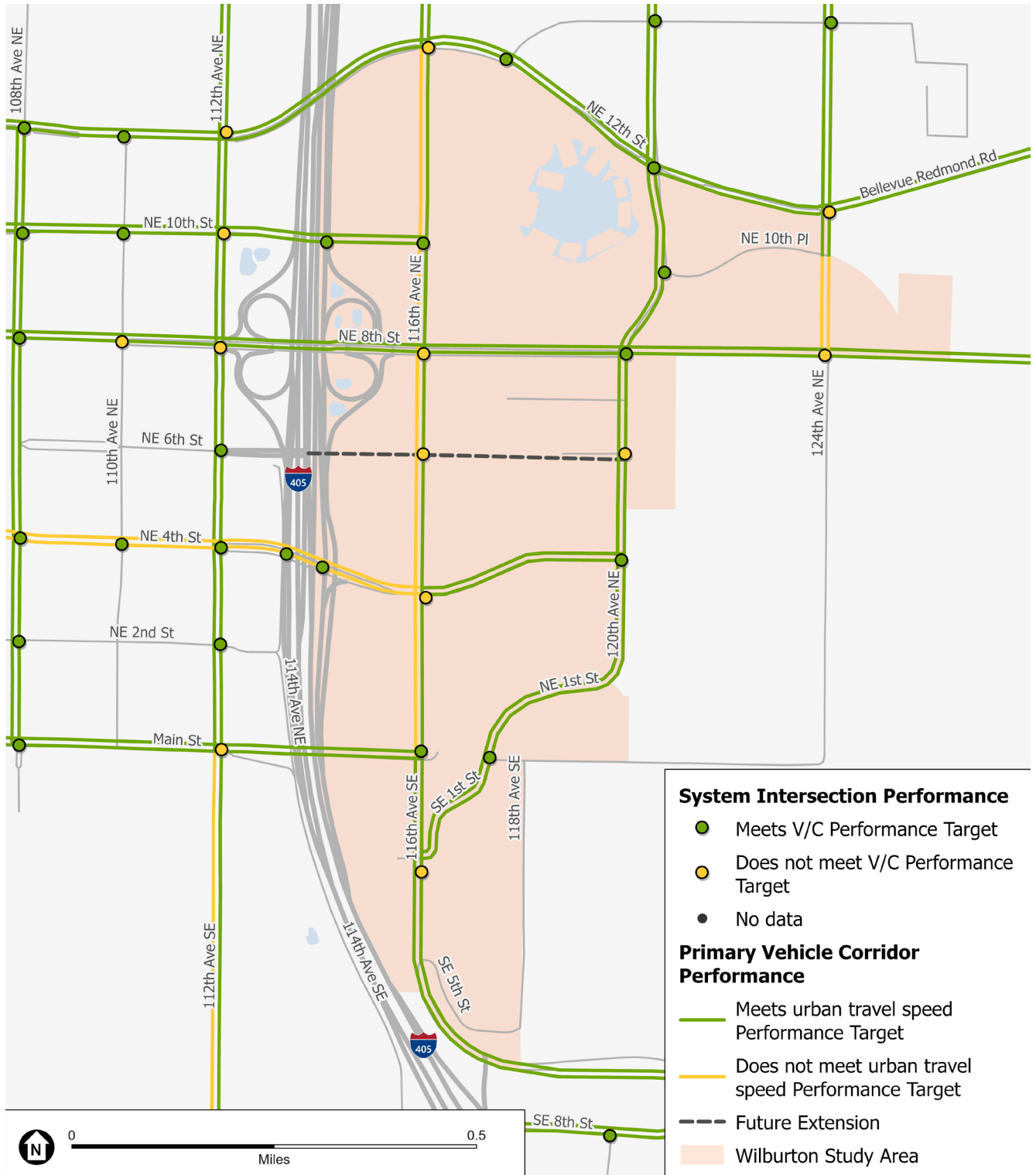
SOURCE: City of Bellevue 2023

NOTE: All System Intersections within the Wilburton study area have a V/C 1.0 performance target except for 124th Avenue NE/NE 8th Street, which has a V/C 0.85 performance target.



SOURCE: City of Bellevue 2023

FIGURE 11-23 Primary Vehicle Corridor System Intersection and Travel Speed Performance – Alternative 3 in the Wilburton Study Area Vicinity (NE 6th Street Extended to 116th Avenue NE)



SOURCE: City of Bellevue 2023

FIGURE 11-24 Primary Vehicle Corridor System Intersection and Travel Speed Performance – Alternative 3A in the Wilburton Study Area Vicinity (NE 6th Street Extended to 120th Avenue NE)

The System Intersections and Primary Vehicle Corridors that would not meet the performance targets would be very similar between Alternative 3 and 3A. The impact findings related to Primary Vehicle Corridor travel speed would be the same between Alternatives 3 and 3A. The only differences between the two alternatives are that Alternative 3 would result in two additional System Intersections along the 120th Avenue NE/NE 1st Street corridor that would not meet the performance target, at NE 8th Street and Main Street; these locations would also be significant impacts. Alternative 3A would result in the new System Intersection at 120th Avenue NE & NE 6th Street to not meet the performance target, which would also constitute a significant impact. In addition to these impact finding variations, the following seven System Intersections would be significantly impacted under both Alternatives 3 and 3A:

- 116th Avenue NE & NE 12th Street
- 124th Avenue NE & Bel-Red Road
- 116th Avenue NE & NE 8th Street
- 116th Avenue NE & SE 1st Street
- 116th Avenue NE & NE 4th Street
- 124th Avenue NE & NE 8th Street
- 116th Avenue NE & NE 6th Street

Although nearly the same intersections would be impacted under Alternatives 3 and 3A, the V/C ratios would vary. The variation between the two network scenarios is small – no more than 0.05 except for two intersections: 116th Avenue NE & NE 8th Street (V/C ratio 0.19 higher under Alternative 3A than under Alternative 3) and 120th Avenue NE & NE 8th Street (V/C ratio 0.07 lower under Alternative 3A than under the Alternative 3). In other words, although extending NE 6th Street as a 5-lane arterial between 116th Avenue NE and 120th Avenue NE would create an additional vehicular connection and east-west capacity, it appears to neither materially alleviate or exacerbate congestion on NE 8th Street or NE 4th Street.

For Alternative 3A, refer to the qualitative assessment for a NE 6th Street Extension between 116th Avenue NE and 120th Avenue NE for the Wilburton Preferred Alternative.

11.2.8 Preferred Alternative

This section summarizes the model results for the Preferred Alternative and the impacts expected based on the thresholds of significance stated in Section 11.2.2, *Thresholds of Significance*. Similar to all alternatives, the Preferred Alternative assumes a build-out scenario of land use. Model results for the Preferred Alternative with the 2044 land use forecast are in Appendix K.

MODE SHARE

Table 11-31 summarizes the mode share projected under the Preferred Alternative in comparison to the No Action Alternative. The Preferred Alternative is expected to result in the same walk and bicycle shares as the No Action Alternative for both Bellevue workers and residents. Under the Preferred Alternative, the transit share among Bellevue workers is expected to decrease while the SOV and HOV mode shares are expected to increase. Mode shares among Bellevue residents would remain very similar between the No Action Alternative and the Preferred Alternative.

TABLE 11-31 Mode Share - Preferred Alternative

Mode	Bellevue Workers		Bellevue Residents	
	No Action	Preferred Alternative	No Action	Preferred Alternative
Walk	8%	8%	18%	18%
Bicycle	0%	0%	1%	1%
SOV	41%	45%	25%	26%
HOV	19%	21%	44%	43%
Transit	32%	26%	12%	12%

SOURCE: City of Bellevue 2023

NOTE: Mode shares are rounded and may not sum to 100%.

VMT PER CAPITA

Table 11-32 presents the total VMT and VMT per capita under the Preferred Alternative compared to the No Action Alternative. The BKRCast model projects that total daily VMT would increase to more than 6.2 million miles, a 22 percent increase over the No Action Alternative and higher than Alternatives 1, 2, and 3. Daily VMT per capita is expected to be nearly 7 miles, or 34 percent lower than the

No Action Alternative at 14.9 miles per day. Preferred Alternative daily VMT per capita would be lower than Alternatives 1, 2, and 3.

TABLE 11-32 VMT and VMT per Capita – Preferred Alternative

	No Action Alternative	Preferred Alternative
Daily VMT	5,112,000 miles	6,234,000 miles
Daily VMT per Capita	22.6 miles	14.9 miles

SOURCE: City of Bellevue 2023

Because daily VMT per capita is expected to decrease relative to the No Action Alternative, **no significant impact on VMT is expected under the Preferred Alternative.**

TRANSIT TRAVEL TIME

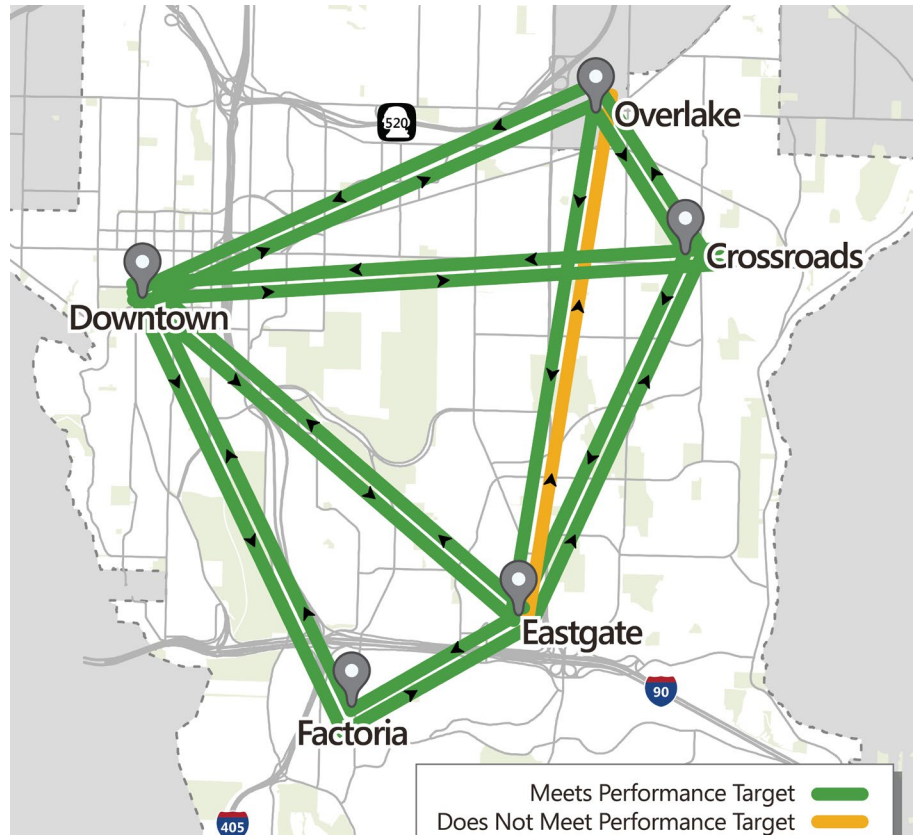
As shown in **Table 11-33** and **Figure 11-25**, one Activity Center pair is expected to not meet the MIP transit travel time ratio target of 2.0: Eastgate to Overlake. As was the case for the other Action Alternatives, the transit travel time ratios are expected to be lower than under the No Action Alternative, meaning that transit would be a more competitive option. The transit travel time ratio that would not meet the performance target is **shown in bold**.

TABLE 11-33 Transit Travel Time Ratio – Preferred Alternative

	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	—	—

SOURCE: City of Bellevue 2023

Because the Eastgate to Overlake Activity Center pair would not meet the target under the No Action Alternative and would not meet the threshold of significance relative to the No Action Alternative, **no significant impact on transit travel time is identified under the Preferred Alternative.**



SOURCE: City of Bellevue 2023

FIGURE 11-25 Transit Network Performance – Preferred Alternative

SYSTEM INTERSECTION VOLUME-TO-CAPACITY RATIO

A summary of intersection V/C results for the Preferred Alternative is shown in **Table 11-34** and mapped in **Figure 11-26**. The table includes all intersections that would not meet the performance target under the Preferred Alternative, along with the V/C ratios expected under the No Action Alternative for comparison. A complete tabular summary is included in Appendix C.

Under the Preferred Alternative, the number of System Intersections that would meet the target would fall to 63 of 134 (47 percent), a decrease of 52 intersections from the No Action Alternative. Specifically, the number of System Intersections that would meet the target would decrease to 41 of 75 (55 percent) in Type 1 PMAs, 7 of 23 (30 percent) in Type 2 PMAs, and 15 of 36 (42 percent) in the Type 3 PMA.

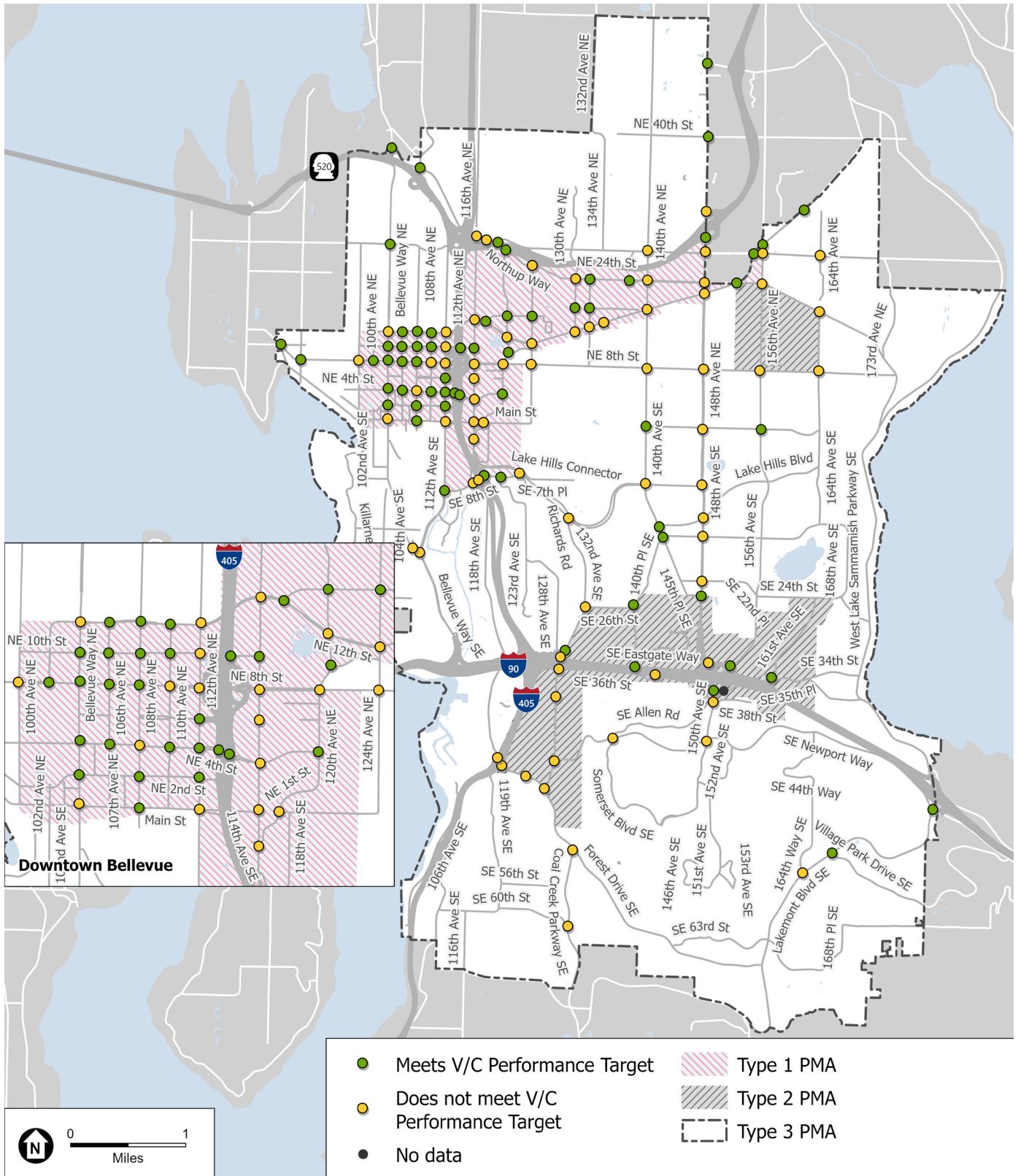
TABLE 11-34 Vehicle Network Performance – System Intersections – Preferred Alternative

Performance Management Area	Performance Target (V/C)	% of Intersections That Would Meet Target	
		No Action	Preferred Alternative
Type 1 PMA	1.00	88%	55%
Type 2 PMA	0.90	91%	30%
Type 3 PMA	0.85	78%	42%
Total System intersections		86%	47%
Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Preferred Alternative	V/C Ratio	
		No Action	Preferred Alternative
Type 1 PMA (Performance Target V/C = 1.00)	100th Ave NE & NE 8th St	0.97	1.06
	Bellevue Wy NE & NE 12th St	1.02	1.04
	Bellevue Wy & Main St	0.99	1.11
	108th Ave NE & NE 4th St	0.86	1.04
	112th Ave NE & NE 12th St	1.05	1.35
	112th Ave NE & NE 8th St	1.23	1.56
	112th Ave & Main St	0.99	1.26
	110th Ave NE & NE 8th St	0.94	1.10
	112th Ave NE & NE 10th St	1.12	1.48
	116th Ave NE & NE 12th St	1.32	2.24
	120th Ave NE & NE 12th St	0.82	1.02
	124th Ave NE & Bel-Red Rd	0.95	1.34
	130th Ave NE & Bel-Red Rd	0.75	1.03
	140th Ave NE & NE 20th St	0.79	1.05
	140th Ave NE & Bel-Red Rd	0.89	1.22
	148th Ave NE & NE 20th St	1.00	1.18
	148th Ave NE & Bel-Red Rd	1.13	1.44
	156th Ave NE & NE 24th St	0.87	1.16
130th Ave NE & Northup Wy	0.76	1.14	
148th Ave NE & NE 24th St	0.98	1.22	
124th Ave NE & Northup Wy	1.23	1.62	
132nd Ave NE & Bel-Red Rd	0.88	1.17	

Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Preferred Alternative	V/C Ratio	
		No Action	Preferred Alternative
	134th Ave NE & Bel-Red Rd	0.71	1.01
	156th Ave NE & Northup Wy	0.82	1.16
	116th Ave NE & NE 8th St	0.87	1.32
	116th Ave & Main St	0.78	1.03
	118th Ave SE & SE 8th St	0.89	1.27
	116th Ave SE & SE 1st St	1.15	1.30
	116th Ave NE & NE 4th St	1.00	1.48
	I-405 SB Ramps & SE 8th St	0.77	1.10
	120th Ave NE & NE 8th St	0.74	1.06
	NE 1st St & Main St	0.64	1.05
	Lk Hills Connector& SE 7th Pl	1.02	1.42
	116th Ave NE & NE 6th St	0.74	1.26
	Type 2 PMA (Performance Target V/C = 0.90)	156th Ave NE & NE 8th St	0.77
164th Ave NE & Northup Wy		0.73	1.03
164th Ave NE & NE 8th St		0.70	1.23
150th Ave SE & SE Eastgate Wy		0.81	0.97
142nd Ave SE & SE 36th St		0.92	1.33
Richards Rd & SE 26th St (Kamber Rd)		0.77	0.99
150th Ave SE & SE 38th St		0.75	1.09
Coal Creek Pkwy & Forest Dr		0.82	0.93
Richards Rd & SE Eastgate Wy		0.70	0.93
Factoria Blvd SE & SE Newport Wy		0.74	0.93
Factoria Blvd SE & Coal Creek Pkwy		0.69	1.03
Factoria Blvd SE & SE 36th St (I-90 EB Off-ramp)		0.81	1.11
I-405 NB Ramps & Coal Creek Pkwy		0.72	0.94
I-405 SB Ramps & Coal Creek Pkwy		1.13	1.31
Factoria Blvd SE & SE 38th St		0.73	0.92
124th Ave SE & Coal Creek Pkwy	0.75	0.97	

Performance Management Area and Performance Target	Intersections That Would Not Meet Target under Preferred Alternative	V/C Ratio	
		No Action	Preferred Alternative
Type 3 PMA (Performance Target V/C = 0.85)	112th Ave SE & Bellevue Wy SE	1.00	1.11
	124th Ave NE & NE 8th St	0.79	1.07
	140th Ave NE & NE 8th St	0.81	1.18
	140th Ave SE & SE 8th St	0.87	1.16
	148th Ave NE & NE 8th St	0.96	1.33
	148th Ave & Main St	0.95	1.18
	148th Ave SE & Lake Hills Blvd	0.86	0.95
	148th Ave SE & SE 16th St	0.86	0.97
	140th Ave NE & NE 24th St	0.79	1.15
	148th Ave SE & SE 8th St	0.78	1.03
	164th Ave NE & NE 24th St	0.65	0.97
	SE Allen Rd/Somerset Blvd & SE Newport Wy	0.60	1.00
	116th Ave NE & Northup Wy	0.79	1.06
	115th Pl NE & Northup Wy	1.00	1.17
	150th Ave SE & SE Newport Wy	0.73	1.19
	Richards Rd & Lake Hills Connector	0.69	1.02
	148th Ave NE & NE 29th Pl	0.72	0.87
	164th Ave SE & Lakemont Blvd	0.71	1.01
148th Ave SE & SE 22nd St	0.86	1.07	
Coal Creek Pkwy SE & SE 60th St	0.72	0.90	
108th Ave SE & Bellevue Way SE	0.79	1.05	

SOURCE: City of Bellevue 2023



SOURCE: City of Bellevue 2023

FIGURE 11-26 System Intersection Performance – Preferred Alternative

Based on the impact criteria for the Action Alternatives, 70 System Intersections would be significantly impacted under the Preferred Alternative. These include all the intersections impacted under Alternatives 1, 2, and 3 as well as additional locations (47 additional locations relative to Alternative 1, 39 additional locations relative to Alternative 2, and 27 additional locations relative to Alternative 3). One exception includes Bellevue Way NE & NE 12th Street, which is impacted under Alternatives 2 and 3, but not under the Preferred Alternative. The locations that would be impacted only under the Preferred Alternative include:

- 108th Avenue NE & NE 4th Street
- 120th Avenue NE & NE 12th Street
- 130th Avenue NE & Bel-Red Road
- 140th Avenue NE & NE 20th Street
- 134th Avenue NE & Bel-Red Road
- 156th Avenue NE & Northup Way
- 116th Avenue & Main Street
- I-405 SB Ramps & SE 8th Street
- 156th Avenue NE & NE 8th Street
- 164th Avenue NE & Northup Way
- 164th Avenue NE & NE 8th Street
- 150th Avenue SE & SE Eastgate Way
- 150th Avenue SE & SE 38th Street
- Coal Creek Parkway & Forest Drive
- Richards Road & SE Eastgate Way
- Factoria Boulevard SE & SE Newport Way
- Factoria Boulevard SE & Coal Creek Parkway
- I-405 NB Ramps & Coal Creek Parkway
- Factoria Boulevard SE & SE 38th Street
- 124th Avenue SE & Coal Creek Parkway
- 148th Avenue SE & Lake Hills Boulevard
- 148th Avenue SE & SE 16th Street
- 164th Avenue NE & NE 24th Street
- SE Allen Road/Somerset Boulevard & SE Newport Way

- 150th Avenue SE & SE Newport Way
- 148th Avenue NE & NE 29th Place
- 164th Avenue SE & Lakemont Boulevard
- Coal Creek Parkway SE & SE 60th Street

Impacted System Intersections are **shown in bold** in Table 11-34.

PRIMARY VEHICLE CORRIDOR TRAVEL SPEED

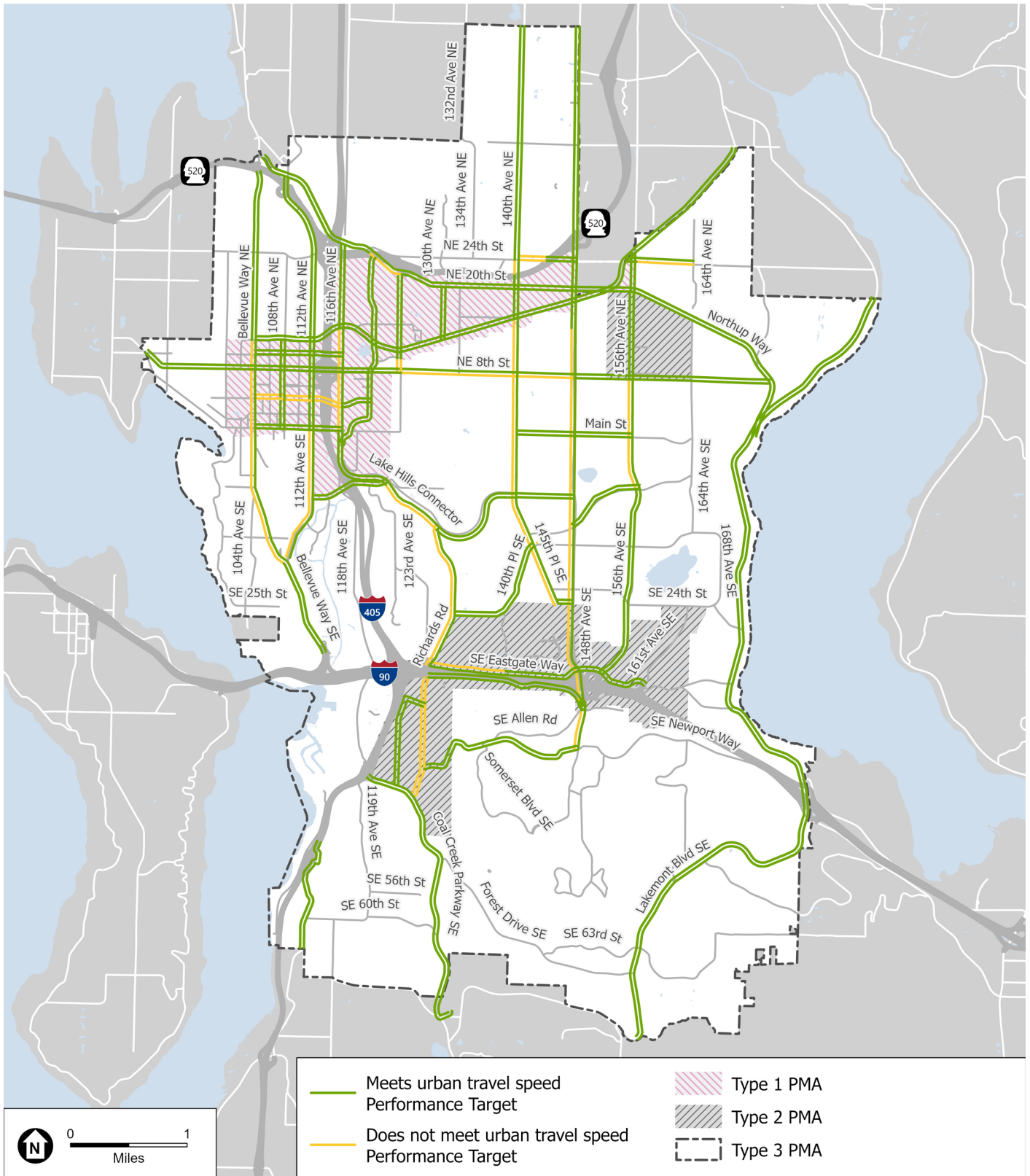
Primary Vehicle Corridor travel speed results are shown in **Figure 11-27** and **Table 11-35**. The table lists the corridors that would not meet the performance target under the Preferred Alternative, along with the speed under both the No Action Alternative and the Preferred Alternative for comparison. Under the Preferred Alternative, 27 of 95 Primary Vehicle Corridors would not meet the performance target. A full tabular summary is included in Appendix C.

The 19 corridors that would not meet the performance target under Alternative 3 would also not meet the target under the Preferred Alternative. The following corridors would also not meet their performance target.

- Northup Way from SR 520 to 124th Avenue NE
- Richards Road from SE 26th Street to I-90
- Factoria Boulevard from I-90 to Coal Creek Parkway
- 140th Avenue NE/145th Place SE from SE 8th Street to SE 24th Street
- 150th Avenue SE from SE 38th Street to Newport Way
- 156th Avenue from NE 8th Street to Lake Hills Boulevard
- NE 24th Street from 156th Avenue NE to 164th Avenue NE
- NE 8th Street from 124th Avenue NE to 148th Avenue NE

Therefore, in total, 27 of the 95 Primary Vehicle Corridors would not meet the performance target under the Preferred Alternative. Because traffic volume is expected to be highest under the Preferred Alternative, corridor travel speed is expected to be lowest among the alternatives.

Of the 95 Primary Vehicle Corridors, 24 (**shown in bold** in Table 11-35) would be significantly impacted under the Preferred Alternative.



SOURCE: City of Bellevue 2023

FIGURE 11-27 Primary Vehicle Corridor Travel Speed – Preferred Alternative

TABLE 11-35 Vehicle Network Performance – Primary Vehicle Corridor Travel Speed – Preferred Alternative

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target	Speed (miles per hour)	
		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
	112th Ave SE – Main St to SE 8th St (SB/WB)	6	4
	140th Ave NE – Bel-Red Rd to NE 14th St (SB/WB)	5	3
	116th Ave NE - NE 12th St to Main St (SB/WB)	8	6
	NE 4th St – Bellevue Way to 116th Ave NE (NB/EB and SB/WB)	5	5
Type 2 PMA (Performance target ≥ 0.75 Typical Urban Travel Speed)	Northrup Way – SR 520 to 124th Ave NE (NB/EB)	11	6
	148th Ave – SE 24th St to SE 37th St (SB/WB)	7	5
	Eastgate Way – Richards Rd to 139th Ave SE (SB/WB)	10	7
	Richards Rd – SE 26th St to I-90 (SB/WB)	11	10
Type 3 PMA (Performance target ≥ 0.9 Typical Urban Travel Speed)	Factoria Blvd - I-90 to Coal Creek Pkwy (NB/EB & SB/WB)	14 NB / 16 SB	8 NB/9 SB
	Bellevue Way – Main St to 112th Ave SE (SB/WB)	10	8
	112th Ave SE – SE 8th St to Bellevue Way (SB/WB)	6	6
	116th Ave NE/Lk Hills Connector – SE 8th St to Richards Rd (SB/WB)	14	7
	Richards Rd – Lk Hills Connector to SE 26th St (SB/WB)	11	10
	140th Ave NE – NE 24th St to SR 520 (SB/WB)	10	8
	140th Ave NE – NE 14th St to NE 8th St (SB/WB)	5	3
	140th Ave – NE 8th St to SE 8th St (SB/WB)	11	6
	140th Ave NE/145th Pl SE - SE 8th St to SE 24th St (SB/WB)	14	11
	148th Ave – NE 15th Ct to NE 8th St (SB/WB)	12	8
	148th Ave – NE 8th St to SE 8th St (SB/WB)	14	7
	148th Ave SE – SE 8th St to SE 24th St (SB/WB)	8	7
	150th Ave SE - SE 38th St to Newport Way (SB/WB)	15	9
	156th Ave - NE 8th St to Lake Hills Blvd (SB/WB)	14	8
	124th Ave NE – NE 10th Pl to NE 8th St (NB/EB & SB/WB)	14	8 NB / 9 SB

Performance Management Area and Performance Target	Corridors That Would Not Meet Performance Target	Speed (miles per hour)	
		No Action	Preferred Alternative
	NE 24th St – 140th Ave NE to SR 520 (NB/EB & SB/WB)	12 EB / 16 WB	9 EB / 12 WB
	NE 24th St – 156th Ave NE to 164th Ave NE (NB/EB)	18	9
	NE 8th St – 124th Ave NE to 148th Ave NE (NB/EB)	17	11

SOURCE: City of Bellevue 2023

EB = east bound; NB = north bound; SB = southbound; WB = westbound.

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.

STATE FACILITIES

Table 11-36 summarizes projected daily volume at each of the state facility study locations under the Preferred Alternative. The Preferred Alternative would result in the highest volume on state facilities among the alternatives. The four study segments that would not meet the LOS D standard under Alternatives 1, 2, and 3 would also not meet the standard under the Preferred Alternative and at slightly higher volumes.

TABLE 11-36 State Facility Performance – Preferred Alternative

Study Location	No Action Alternative		Preferred Alternative	
	AADT	Volume-to-LOS D Maximum Service Volume Ratio	AADT	Volume-to-LOS D Maximum Service Volume Ratio
I-405 north of SR 520	225,000	1.05	234,000	1.10
I-405 between SR 520 and I-90	238,000	1.23	253,000	1.32
I-405 south of I-90	180,000	1.39	190,000	1.46
SR 520 west of I-405	79,000	0.61	98,000	0.75
SR 520 east of I-405	120,000	0.95	139,000	1.10
I-90 west of I-405	145,000	0.84	157,000	0.91
I-90 east of I-405	154,000	0.72	176,000	0.83

SOURCE: Fehr & Peers 2023

Based on the impact criteria, four study segments would be significantly impacted by the Preferred Alternative: I-405 north of SR 520, I-405 between SR 520 and I-90, I-405 south of I-90, and SR 520 east of I-405.

WILBURTON STUDY AREA

The Preferred Alternative would include the greatest capacity for growth in the Wilburton study area among the Action Alternatives. Therefore, it is projected to result in higher vehicle volumes than the No Action Alternative and the other Action Alternatives. Like Alternative 3, the Preferred Alternative was evaluated using two different networks in the Wilburton study area:

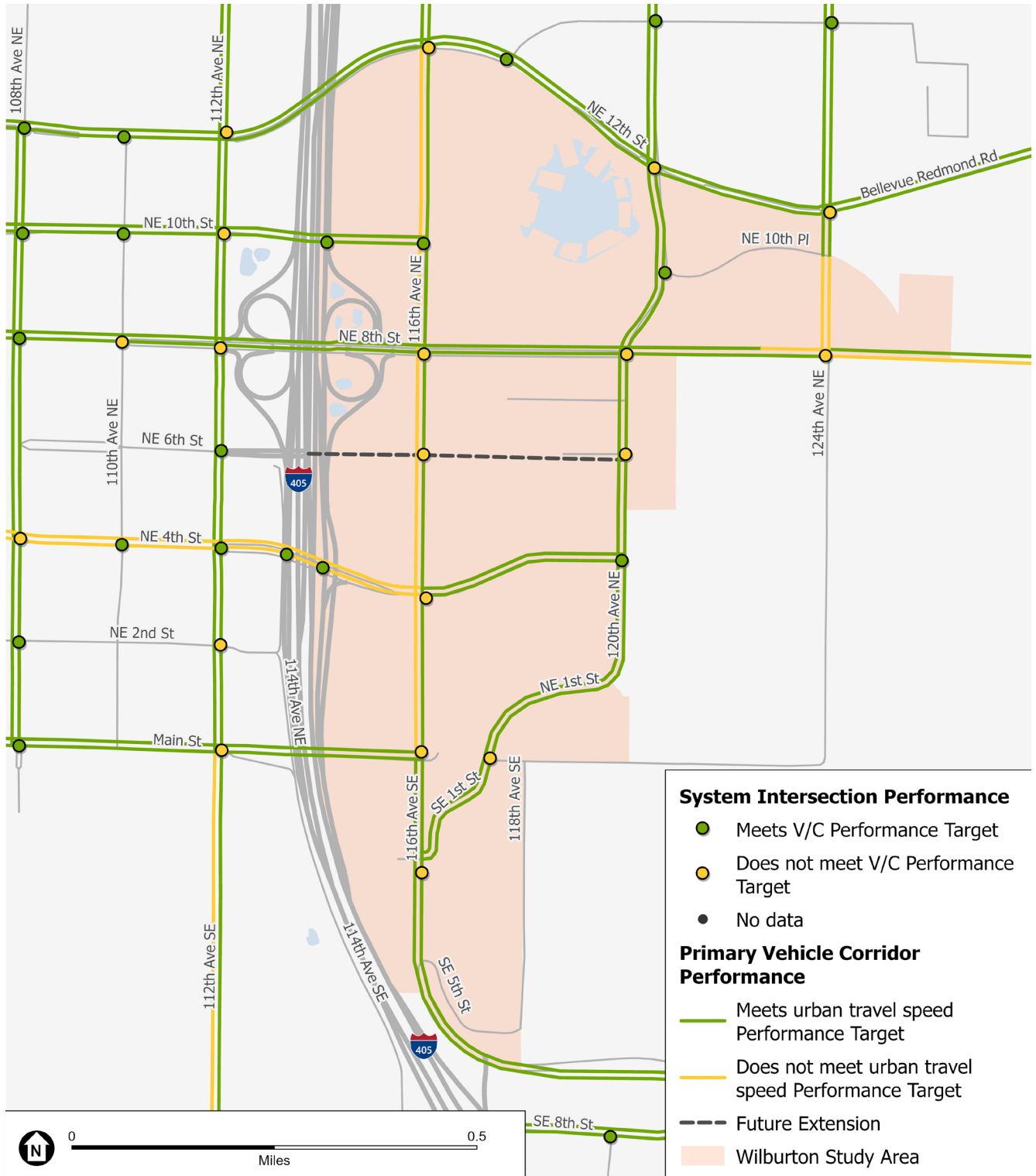
- **Preferred Alternative:** NE 6th Street extension built to 116th Avenue NE (consistent with the assumptions for the other future year alternatives).
- **Preferred A Alternative:** NE 6th Street extension built as a 5-lane arterial between 116th Avenue NE and 120th Avenue NE with an at-grade intersection at 116th Avenue NE and with Eastrail.

Primary Vehicle Corridor travel speed and System Intersection V/C ratio results within the Wilburton study area are shown in **Figure 11-28** for the Preferred Alternative and **Figure 11-29** for Preferred A Alternative. V/C ratio results for both the Preferred Alternative and Preferred A Alternative are summarized in **Table 11-37**, and impacted locations are **shown in bold**.



SOURCE: City of Bellevue 2023

FIGURE 11-28 Primary Vehicle Corridor System Intersection and Speed Performance - Preferred Alternative in the Wilburton Study Area Vicinity (NE 6th Street Extension to 116th Avenue NE)



SOURCE: City of Bellevue 2023

FIGURE 11-29 Primary Vehicle Corridor System Intersection and Corridor Travel Speed Performance – Preferred A Alternative in the Wilburton Study Area Vicinity (NE 6th Street Extension to 120th Avenue NE)

TABLE 11-37 Wilburton Study Area Vehicle Network Performance – System Intersections – Preferred Alternative and Preferred A Alternative

Intersection	V/C Ratio		
	No Action	Preferred Alt	Preferred A Alt
I-405 SB Ramps & NE 4th St	0.56	0.57	0.58
116th Ave NE & NE 12th St	1.32	2.24	2.20
120th Ave NE & NE 12th St	0.82	1.02	1.02
124th Ave NE & Bel-Red Rd	0.95	1.34	1.30
Spring Blvd & NE 12th St	0.54	0.81	0.81
120th Ave NE & Bel-Red Rd	0.41	0.46	0.47
116th Ave NE & NE 8th St	0.87	1.32	1.52
116th Ave & Main St	0.78	1.03	1.01
116th Ave SE & SE 1st St	1.15	1.30	1.28
116th Ave NE & NE 4th St	1.00	1.48	1.49
120th Ave NE & NE 8th St	0.74	1.06	1.01
116th Ave NE & NE 10th St	0.70	0.94	0.94
NE 1st St & Main St	0.64	1.05	1.07
120th Ave NE & NE 4th St	0.50	0.61	0.67
I-405 NB Ramps & NE 4th St	0.59	0.69	0.70
I-405 NB Ramps & NE 10th St	0.64	0.85	0.87
124th Ave NE & NE 8th St	0.79	1.07	1.12
116th Ave NE & NE 6th St	0.74	1.26	1.26
120th Ave NE & NE 6th St	N/A	N/A	1.09

SOURCE: City of Bellevue 2023

NOTE: All System Intersections within the Wilburton study area have a 1.0 performance target except for 124th Avenue NE/NE 8th Street, which has a 0.85 performance target.

The System Intersections and Primary Vehicle Corridors that would not meet the performance targets would be almost identical between the Preferred Alternative and Preferred A Alternative. The only difference is that NE 8th Street between 123rd Avenue NE and 124th Avenue NE would not meet the performance target in the westbound direction under the Preferred A Alternative. The impact findings related to Primary Vehicle Corridor travel speed would be the same between the Preferred Alternative and Preferred A

Alternative (three impacted Primary Vehicle Corridors). In addition, the new System Intersection created at NE 6th Street & 120th Avenue NE under the Preferred A Alternative would not meet the performance target and would also constitute a significant impact. The follow System Intersections would be significantly impacted under both the Preferred Alternative and Preferred A Alternative:

- 116th Ave NE & NE 12th St
- 120th Ave NE & NE 12th St
- 124th Ave NE & Bel-Red Rd
- 116th Ave NE & NE 8th St
- 116th Ave & Main St
- 116th Ave SE & SE 1st St
- 116th Ave NE & NE 4th St
- 120th Ave NE & NE 8th St
- NE 1st St & Main St
- 124th Ave NE & NE 8th St
- 116th Ave NE & NE 6th St

Although the same intersections would be impacted under the Preferred Alternative and Preferred A Alternative, the V/C ratios would vary. The variation between the two network scenarios is no more than 0.05 except for two intersections: 116th Avenue NE & NE 8th Street (V/C ratio 0.20 higher under Preferred A Alternative than under the Preferred Alternative) and 120th Avenue NE & NE 4th Street (V/C ratio 0.06 higher under Preferred A Alternative than under the Preferred Alternative). In other words, although extending NE 6th Street as a 5-lane arterial between 116th Avenue NE and 120th Avenue NE would create an additional vehicular connection and east-west capacity, it appears to neither materially alleviate or exacerbate congestion on NE 8th Street or NE 4th Street.

The east terminus of the NE 6th Street extension is further evaluated in conjunction with the Wilburton Vision Implementation planning initiative based on alignment with Comprehensive Plan policies and including the assumed 2044 transportation network identified in the Transportation Facilities Plan that is identical to the Preferred Alternative. Additional qualitative categories were used to identify potential impacts of an arterial extension of NE 6th Street between 116th Avenue NE and 120th Avenue NE.

Land Use Compatibility. The expected scale of an arterial extension of NE 6th Street (modeled as a 5-lane arterial similar to the segment of NE 4th Street between 116th Avenue NE and 120th Avenue NE) is generally incompatible with the future vision for the Wilburton study area as a walkable urban neighborhood with street-facing active uses. The NE 6th Street extension is also located in proximity to the intersection of the Grand Connection and Eastrail. An arterial extension could be incompatible with new transportation, land use, and open space opportunities associated with these future investments.

Climate/Environment. The design and function of an arterial extension of NE 6th Street would increase impervious and pollution-generating surfaces and potentially induce vehicle trips that increase greenhouse gas emissions.

Connectivity/Access. An arterial extension of NE 6th Street would provide a new complete streets connection that does not currently exist, but would also require an additional vehicle crossing of Eastrail, which would degrade the experience for those using the trail. Creating an additional vehicle crossing would also introduce a new modal conflict point between vehicles and vulnerable users (e.g., pedestrians and bicyclists) that would not exist under the No Action Alternative or Action Alternatives 1, 2, 3, and the Preferred Alternative. This increased exposure could result in a potential safety impact at that location; to mitigate this potential impact, the design would include appropriate traffic control mechanisms, such as a signalized intersection.

Traffic. An arterial extension of NE 6th Street could induce general purpose vehicle trips by providing new vehicle capacity, and may have adverse safety impacts on vulnerable users (e.g., pedestrians and bicyclists). To mitigate this potential impact, aggressive implementation of transportation demand management programs and new active transportation facilities could minimize the demand for new vehicle trips.

Constructability/Cost. Similar to the NE 4th Street extension completed in 2015, an arterial extension of NE 6th Street is likely to be a public project funded with resources dedicated by the City Council through the CIP. Based on the actual cost of the NE 4th Street extension, the anticipated cost of a NE 6th Street extension may be in excess of \$50M for right-of-way acquisition and construction. An arterial would require substantial engineering and cut/fill of steep slope areas due to elevation difference (approximately 50 feet) between Eastrail and 116th Avenue NE, and would need to factor in

potential design constraints of the East Link guideway. The NE 6th Street extension to 120th Avenue NE would have more property impacts than the planned eastward extension from I-405 extension that terminates at 116th Avenue NE.

11.2.9 Summary of Impacts

Table 11-38 summarizes the impact findings across the alternatives under a hypothetical build-out scenario for all alternatives. Note that Appendix K summarizes the model results from the 2044 land use forecast for the Preferred Alternative. A purpose of this programmatic EIS is to disclose how potential land use and land use designation actions by the City Council may impact the transportation system relative to what would occur with currently adopted land use designations and policies (in other words, the No Action Alternative). Therefore, the impacts of each Action Alternative under consideration are assessed against the performance of the No Action Alternative. The impacts that are expected to occur as a result of the No Action Alternative are also expected under the Action Alternatives even if those alternatives would not result in additional significant impacts.

All Action Alternatives are expected to have significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities based on the thresholds for significance identified in this EIS. Among the Action Alternatives, the magnitude of impacts would generally be lowest for Alternative 1 and highest for the Preferred Alternative.

Although the focus of the EIS is on documenting impacts and identifying mitigation measures of the Action Alternatives rather than the current land use, policy, and adopted code (i.e., No Action Alternative), many of the mitigation measures proposed for the Action Alternatives would also reduce impacts under the No Action Alternative.

TABLE 11-38 Summary of No Action Impacts and Significant Impacts Resulting from Action Alternatives

Impact Type	No Action Alternative	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Pedestrian Network System Completeness	None	None	None	None	None
Bicycle Network System Completeness	None	None	None	None	None
Transit Network System Completeness	None	None	None	None	None
Safety	None	None	None	None	None
Parking	None	None	None	None	None
VMT Per Capita	None	None	None	None	None
Transit Travel Time	3 of 16 Activity Center pairs	None	None	None	None
System Intersection V/C	19 of 134 System Intersections	23 of 134 System Intersections	31 of 134 System Intersections	43 of 134 System Intersections	70 of 134 System Intersections
Primary Vehicle Corridor Travel Speed	14 of 95 Primary Vehicle Corridors	5 of 95 Primary Vehicle Corridors	11 of 95 Primary Vehicle Corridors	13 of 95 Primary Vehicle Corridors	24 of 95 Primary Vehicle Corridors
State Facilities	3 of 7 study segments	4 of 7 study segments	4 of 7 study segments	4 of 7 study segments	4 of 7 study segments

11.3 Avoidance, Minimization, and Mitigation Measures

A range of potential mitigation strategies could be implemented to reduce the significance of the adverse impacts identified for Alternatives 1, 2, 3, and the Preferred Alternative.

As noted previously in this EIS, the transportation system analysis is based on the BKRCast travel demand model and analyzes growth to a hypothetical build-out capacity. Assumptions for future year land use and the transportation network are embedded into the model, as are assumptions related to factors such as parking cost, regional tolling, and energy prices. Because it is based on a set of assumptions that are likely to change over time, BKRCast is a tool best used to compare the relative differences among alternatives rather than to provide a precise prediction of future transportation network operations. As such, this section describes the types of mitigation measures, rather than specific projects, that could be pursued to address the expected impacts. As development occurs, Bellevue will determine the specific capital investments and programmatic improvements best suited to address the conditions that will be better known or forecast at the time. Potential capital projects will be identified and prioritized to address performance target gaps through the Mobility Implementation Plan. Project concepts will be further vetted through the Transportation Commission in each update of the Transportation Facilities Plan, a fiscally constrained plan that identifies and prioritizes projects over the subsequent 12-year period; the Transportation Facilities Plan is updated every 2 to 3 years. Finally, the City Council will allocate resources to fund the design and construction of specific projects in the CIP.

A spectrum of impacts on System Intersection V/C ratio, Primary Vehicle Corridor travel speed, and state facilities were identified in the impact analysis. Among the alternatives studied, the Preferred Alternative modeled in a build-out scenario is expected to result in the highest number of impacted locations and the largest magnitude of impacts, while the No Action Alternative is expected to result in the lowest number and magnitude of impacts (with Alternatives 1, 2, and 3 falling in between). While the preceding section identifies specific transportation facilities that may be impacted, the precise magnitude of these impacts cannot be known at this time. Rather, Bellevue will continue to monitor the transportation system performance over time as growth occurs and assumptions and

circumstances change (or become realities) and consider the best way to address impacts that are expected to arise.

It is also important to reiterate that, for analysis purposes, the BKRCast modeling assumes growth at the hypothetical build-out capacity of the land in Bellevue. This is a very conservative assumption that may indicate adverse impacts on the transportation network that are not likely to occur by the 2044 horizon year of the plan, as it takes time for properties to redevelop, and many properties will not be built to the maximum capacity allowed. Appendix K presents an analysis of potential transportation network impacts in a 2044 land use forecast scenario for the Preferred Alternative.

Given the uncertainties with respect to the rate, location, and type of land development and redevelopment and the operations of the transportation network, the mitigation measures and strategies identified in this EIS are programmatic in nature (e.g., they do not specify details, design, and performance outcome of a capital improvement at an intersection). Instead, the approach to actual mitigation will first include the process outlined in the Mobility Implementation Plan to identify and prioritize project concepts that would address performance target gaps. The city may then determine interventions to reduce the magnitude of any transportation impacts, noting that any intervention may not reduce the impact to a level that meets the performance target or that is less-than-significant as defined in this EIS. Potential mitigation measures and strategies may also be informed by several adopted transportation plans, programs, and strategies that can be combined to effectively address multimodal transportation network impacts. These plans, programs, and approaches include:

- **Mobility Implementation Plan (MIP):** The MIP established performance targets and guides Bellevue's approach to identifying and prioritizing transportation network projects to address performance target gaps across all modes. Applying this process will improve multimodal options by addressing performance gaps for all modes, potentially directly mitigating System Intersection V/C and Primary Vehicle Corridor travel speed impacts as well as encouraging mode shift that could indirectly mitigate System Intersection V/C, Primary Vehicle Corridor travel speed, and state facility LOS impacts.
- **Transportation Demand Management Strategies:** The TDM program is intended to help commuters and others find a mode of travel other than a private vehicle to reach their destination,

helping to mitigate System Intersection V/C, Primary Vehicle Corridor travel speed, and state facility LOS impacts.

- **Transportation Systems Operations and Management (Smart Mobility):** Smart Mobility strategies are intended to create as much efficiency as possible out of existing infrastructure, maximizing the capacity and performance of the system without physical infrastructure expansion.
- **Agency Partnerships:** Partnerships with transportation agencies are critical to funding and implementing a variety of improvements, particularly King County Metro and Sound Transit for transit speed and reliability improvements and transit stop amenities, and WSDOT to address state facility LOS impacts.
- **Parking Strategies:** Parking policies that address parking supply and management can be used to influence travelers' decisions regarding their mode of travel, affecting the number of vehicle trips, traffic congestion, and per capita VMT.
- **Safety Strategies:** The safety program aims to eliminate traffic deaths and serious injury collisions on city streets, with a particular focus on the most vulnerable travelers. Improving safety on city streets offers travelers increased comfort in choosing a non-vehicle mode, which could mitigate System Intersection V/C and Primary Vehicle Corridor travel speed.

11.3.1 Mobility Implementation Plan

The Mobility Implementation Plan (MIP) establishes performance targets for all modes and outlines Bellevue's approach to identify and prioritize transportation network projects to address performance target gaps and to weigh needs across all modes so that the development of the transportation network is aligned with the growth that is occurring and planned through the land use vision set out in the Comprehensive Plan. Adopted performance metrics and performance targets for all modes describe the intended complete and connected transportation network. The MIP is the framework by which to identify measures to address performance target gaps because it recognizes that different areas of the city call for different approaches. The MIP describes four steps to identify and prioritize project concepts to address performance target gaps known at the time the Transportation Facilities Plan is being updated (every 2 to 3 years). These steps are shown in **Figure 11-30** and described thereafter.

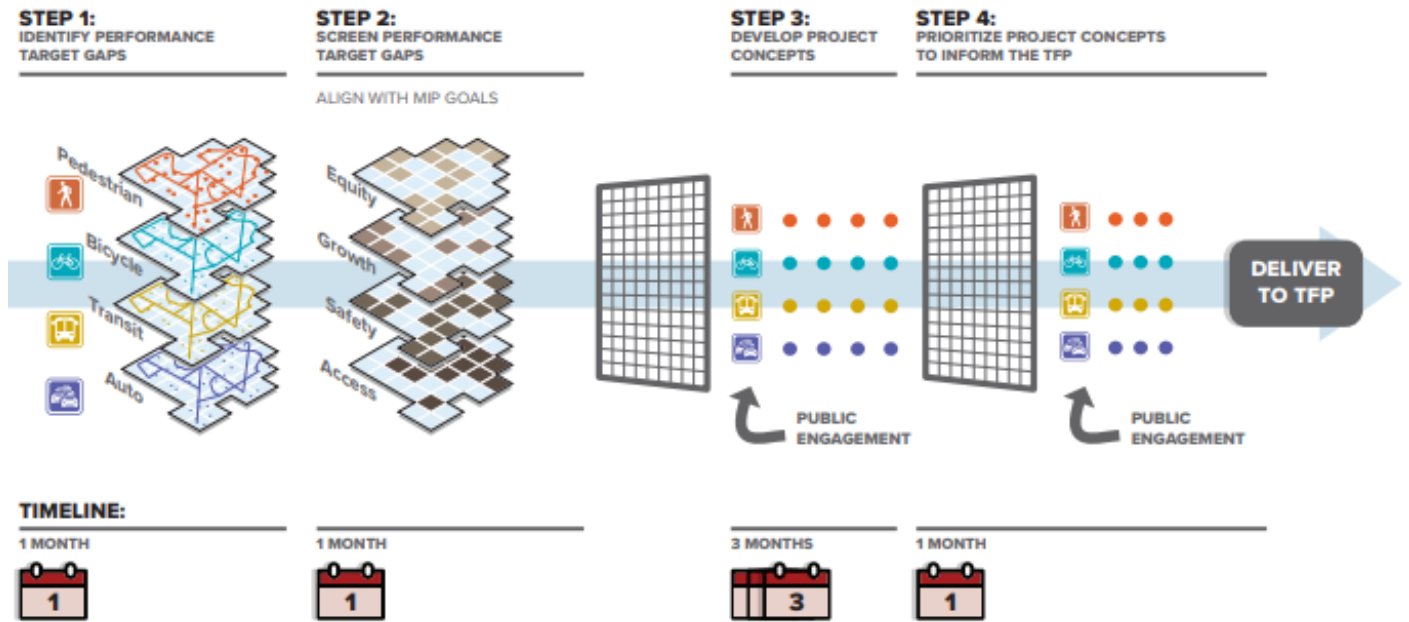


FIGURE 11-30 MIP Steps to Identify and Prioritize Project Concepts

1. **Identify Performance Target Gaps.** The first step is to identify locations where transportation network performance for any mode does not meet expectations—performance target gaps.
2. **Screen Performance Target Gaps – MIP Goals.** Prioritize project concepts to address performance target gaps that best advance the four goals of the MIP: Support Growth, Improve Safety, Consider Equity, and Improve Access and Mobility.

The MIP includes two additional steps that specifically apply to identifying, prioritizing, and ultimately implementing specific projects to address performance target gaps. These final two steps would be initiated with each update of the Transportation Facilities Plan (every 2 to 3 years), and more detailed transportation impact analyses are conducted and design concepts are developed for specific project concepts:

3. **Develop Project Concepts.** For performance target gaps with higher prioritization scores, staff would develop initial project concepts intended to improve performance. However, as noted above, it will not always be possible to fully meet each performance target. Project concepts will be developed and reviewed in the context of the four MIP goals as well as other performance factors such as environmental sustainability and livability.

4. Prioritize Project Concepts – Deliverable to the Transportation Facilities Plan. The final step of the MIP project identification and prioritization process is to inform the development of the Transportation Facilities Plan (TFP) based on the outcomes of Steps 1 through 3. Bellevue staff will deliver a prioritized list of project concepts to the Transportation Commission for consideration in the TFP update process, along with contextual information that describes how each project concept would address a specific performance target gap, support MIP goals and other factors, and respond to community input.

Through the development review process, Bellevue also works with private-sector developers to address performance target gaps as mitigation for development-related impacts, particularly for those gaps that are immediately adjacent to or caused by a development.

As stated above, the MIP is also used in conjunction with the development and administration of the city's codes, standards, and regulations, including the Multimodal Concurrency Code (Chapter 14.10 BCC), Transportation Design Manual requirements, and Transportation Impact Fee Program (Chapter 22.16 BCC) to ensure that the performance and capacity of the city's transportation system accommodate anticipated growth. Many of the impacts identified herein are to be expected as the city continues to grow, and the transportation network evolves with that growth. Although this programmatic EIS does not specifically analyze project-level level impacts, it is anticipated that the development of the city's codes, standards, and regulations will continue to be informed by the MIP, and the application of updated codes, standards, and regulations will continue to provide development-specific and project-level mitigation measures in connection with development proposed during the 20-year planning period.

The MIP prioritization framework will guide Bellevue's programmatic approach in this EIS to identify potential capital and operational investments in the transportation network to address performance target gaps (e.g., System Intersection V/C and Primary Vehicle Corridor travel speed) as well as investments that do not directly address an impact, but provide for more options and transportation network capacity to support growth (e.g., continuing to complete the pedestrian and bicycle networks to address performance target gaps in those modes). As noted in the MIP, Bellevue will continue to invest in the multimodal network over time and there will likely be performance target gaps in the future. Some of these gaps are a

result of the time and resources it takes to build a complete network. Some gaps (particularly related to System Intersections and Primary Vehicle Corridors) will remain because a project to address a performance target gap that would improve V/C or increase corridor travel speed must be balanced against other considerations and priorities such as safety, environmental stewardship, land use, and urban design, etc.

11.3.2 Transportation Demand Management Strategies

Bellevue promotes a variety of transportation demand management (TDM) strategies to encourage travel by carpooling, vanpooling, transit, walking, and biking, as well as to reduce trips by promoting teleworking. These types of measures can contribute to addressing performance target gaps and adverse impacts related to System Intersection V/C ratio and Primary Vehicle Corridor travel speed, as well as to state facility LOS and transit travel time ratio. Parking supply and management is also a component of a comprehensive TDM strategy that has implications for the performance of the transportation network. The degree to which TDM strategies can address performance target gaps depends on the types of strategies and how aggressively they are implemented, as well as the context of the impacted location, available mobility options, and magnitude of the impact relative to the performance target.

Bellevue maintains a travel options website, [ChooseYourWayBellevue.org](https://www.bellevue.org/transportation/choose-your-way), that provides transportation information and resources, such as personalized commute assistance and travel rewards. TDM activities focus on employers, employees, property managers, residents, students, and visitors to maximize the efficiency of the existing transportation network and limit the effects of traffic on Bellevue neighborhoods. Bellevue published a TDM Plan in 2015 to guide its TDM strategies and implementation through 2023; an updated plan will be initiated, in consultation with the Transportation Commission, in early 2024, for the period 2024–2032. Key strategies of the 2015 TDM Plan include:

- Requirement-based programs, including Commute Trip Reduction employer-based programs and Transportation Management Programs for large developments.
- Product subsidies and discounts, including transportation benefit rebates, transportation mini-grants, and emergency ride home.

- Education and assistance, including commute program consulting services, program expert consulting services, real-time and longer-term travel information assistance, rideshare and ridematch promotion, and school programs aimed at K-12 students and their parents.
- Incentives and rewards, including trip logging and rewards programs, commute challenges, and parking cashout.
- Marketing and promotions of TDM strategies, the Choose Your Way Bellevue website, carsharing, recognition programs, and email newsletters.
- Research, planning, and internal and external coordination to explore new TDM approaches and program opportunities.

With the update to the TDM Plan, Bellevue has an opportunity to leverage new transportation investments, such as East Link light rail, to support the community in adopting new travel behaviors that can reduce impacts on the transportation network.

TDM-supportive policies are outlined in the Transportation Element of the Comprehensive Plan along with related planning and implementation activities, including the Environmental Stewardship Initiative Strategic Plan 2021–2025, the Transit Master Plan (2014), the Pedestrian and Bicycle Implementation Initiative, the 2009 Pedestrian and Bicycle Transportation Plan, Downtown Transportation Plan (2013), and the Economic Development Plan (2020).

Transportation Management Programs (TMPs) are required by Bellevue City Code (BCC Section 14.60.070) for property owners of large development projects. The programs are designed to encourage tenant employees to reduce vehicle commute trips and therefore the resulting traffic and parking impacts.

In addition to city programs, TransManage, a Transportation Management Association (TMA) operated by the Bellevue Downtown Association, works with property managers, employers, and businesses in the Downtown core and greater Eastside to promote non-drive alone commutes.

At the state level, the Washington State Commute Trip Reduction (CTR) Law, passed in 1991, requires large employers to implement employee commute programs to reduce drive-alone peak-hour commute trips, with the goals of reducing traffic congestion and energy use, and improving air quality. The CTR Law applies to employer worksites with at least 100 employees who begin work

between 6 a.m. and 9 a.m. on weekdays. Employers who meet this threshold must develop commute trip reduction plans and work toward meeting their mode share targets through internal programs and monitoring. Affected employers must:

- Designate a transportation coordinator.
- Distribute information about non-drive alone commute options to employees.
- Survey employees every other year to measure VMT and mode choice.
- Implement measures designed to achieve CTR goals adopted by the jurisdiction in which they are located.

The CTR program is currently undergoing a shift in the funding allocation and approach to better meet employer and jurisdictional needs and increase the effectiveness of the program. The changes in the CTR program present an opportunity for Bellevue to reevaluate the city's TDM programs and implement new strategies to improve employer-focused TDM efforts. For instance, both the CTR and TMP programs are currently for large employment sites. Given the growth considered in this EIS, Bellevue could adapt previous programs or develop new programs tailored to smaller employers, residential buildings, or trips for non-work purposes, such as recreation or shopping, to reach a broader population and further reduce drive alone travel.

Research by the California Air Pollution Control Officers Association (CAPCOA) has demonstrated that implementation of TDM strategies can measurably reduce vehicle trips, potentially mitigating the Action Alternatives' impacts related to traffic congestion and parking. Additional new or expanded TDM measures could include:

- Encourage or require development to implement specific TDM strategies outside of those already required, such as shuttle programs between buildings, mobility hubs, or park-and-ride lots.
- Review and revise the parking requirements currently in place to help meet or exceed mode-share goals.
- Encourage or require developers to unbundle parking to separate parking costs from the cost of buying or renting a property; prohibit the sale of monthly commercial parking permits (all non-residential parking is priced at a daily rate).
- Expand subsidized transit pass programs, including residential developments.

- Expand trip reduction programs to include new participants such as smaller businesses, multi-family residential properties, or community members at large.
- Improve bicycle and pedestrian network facilities, including last-mile connections and end-of-trip facilities such as bicycle parking.
- Support micromobility programs such as shared micromobility (e.g., bike share, other shared mobility devices).

The Land Use–Transportation Connection

While specific transportation projects and services can improve mobility and address performance target gaps, the interconnection between land use and transportation is critical to consider in the context of this EIS. The intensity, mix, and location of land uses have a strong effect on transportation network demand, not only in terms of the number of trips that are generated, but on the mode of travel people choose to take.

This pattern is reflected in both historic data and the modeling performed for this EIS. For example, based on data from the Commute Trip Reduction program, since 1995, drive-alone mode share for commuting trips in Downtown Bellevue has decreased from 67 to 45 percent.

In terms of the EIS modeling, the increasingly intense land development potential of Alternatives 1 through the Preferred Alternative, which concentrate development density near frequent transit and areas with robust pedestrian and bicycle infrastructure, results in higher mode shares for walking, bicycling, and transit.

In general, the land use strategies explored in the Action Alternatives will reduce reliance on cars and better leverage Bellevue’s walking, bicycling, and transit networks, as these modes can move more people in less space and with fewer overall environmental impacts. Therefore, the growth alternatives have inherent transportation network benefits compared to the No Action Alternative.

Expanding TDM programs as described above, combined with planned improvements to the pedestrian and bicycle networks and increased mix and density of land use, could further reduce drive-alone vehicle trips and help mitigate the impacts of the Action

Alternatives. Specifically, an analysis of CAPCOA data⁴ suggests a vehicle trip reduction range of 5–10 percent for the above TDM programs. This reduction would be in addition to the vehicle trip reductions gained by Bellevue’s existing TDM requirements.

11.3.3 Transportation Systems Operations and Management (Smart Mobility)

In addition to mitigating impacts through expanding capacity and reducing demand on the transportation network, Bellevue continually works to gain more efficiency out of the existing facilities. Smart Mobility refers to strategies that optimize the existing multimodal transportation network by implementing improvements that support operations, traveler information, mobility services, and maintenance. The integration of technology in these areas allows Bellevue to maximize the performance of existing facilities without adding capacity. Smart Mobility solutions can also improve safety and provide flexibility to address changing conditions, such as traffic congestion. Smart Mobility strategies can prioritize movement of specific modes, including active transportation, transit, and freight. Coordination across agencies and integration of various modes allow the entire system to achieve greater overall performance. Bellevue’s 2018 *Smart Mobility Plan* highlights many of the initiatives that have been deployed or are being developed to improve the performance of the multimodal transportation network in the city.

Bellevue’s Smart Mobility program is an important tool in the effort to manage the transportation network as the city continually strives to mitigate impacts associated with traffic congestion, construction, delivery, and parking. Potential Smart Mobility strategies that Bellevue might consider include:

- In-vehicle information about the presence of vulnerable road users such as people on bicycles and walking and notifications about posted speeds, speed warnings, and activation of rectangular rapid flashing beacons.
- Wayfinding in vehicles and on the roadside to support access to available parking and load zones on both public and private facilities.
- Improved transit signal priority (TSP) that is less reliant on roadside hardware and directly integrated between the city’s traffic signal system and King County Metro’s transit vehicle

⁴ https://www.caleemod.com/handbook/full_handbook.html.

locating system. This integration will reduce the cost of expansion and improve the reliability of the system.

- Integrate local signal system data with probe-based speed data to evaluate signal system performance to improve travel flow. Also consider operational improvements at traffic signals that support pedestrian safety. These include expanding the use of “leading pedestrian interval” and using video analytics to extend crossing timings based on real-time crosswalk activity.
- Use video analytics technology to study safety improvements at High Injury Network locations.
- Support the advancement of new mobility solutions, such as autonomous and connected vehicle technology, that can advance travel options to reduce single occupancy vehicle trips and improve safety and sustainability. The City of Bellevue’s and the City of Seattle’s 2023 *Strategic Vision for Automated Vehicles* outlines the steps to advance support of this technology.
- Work with regional partners to advance the virtually coordinated management of events and incidents that affect the regional transportation network.
- Expand roadside equipment health monitoring to improve response to failures and tracking of equipment performance.

Bellevue’s Smart Mobility program is well aligned with the MIP framework as it focuses on ways to improve the traveler experience in built-out areas that are physically constrained, where capacity improvements may not be feasible. Together with regional partners such as King County Metro, Sound Transit, PSRC, and WSDOT, Bellevue could coordinate implementation of Smart Mobility strategies to improve the performance of transit, highways, or other regional facilities that may be impacted by the Action Alternatives.

11.3.4 Agency Partnerships

WSDOT, King County Metro, Sound Transit, and PSRC all provide transportation resources, services, and facilities for people in Bellevue. Bellevue works with these partner agencies to expand multimodal access to/from and within the city. These partnerships are critical for the continued evolution of the regional multimodal network. For example, mitigating impacts on the transit travel time ratio between activity centers would require close coordination with transit agency partners. Bellevue could continue to communicate with King County Metro and Sound Transit to identify locations where buses experience delay on city streets and implement additional

transit speed and reliability improvements, such as dedicated bus lanes, transit queue jumps, transit signal priority, or bus bulbs.

Bellevue will continue its partnership with WSDOT to monitor conditions on state facilities that connect to and traverse the city. WSDOT Design Manual Chapter 1130.09(2)(a) includes impact thresholds that apply at the individual project level. As the city continues to administer development approvals, staff can work with WSDOT to consider how to best integrate the state highway impact threshold into its development review process.

11.3.5 Parking Strategies

Parking is often at the center of many urban transportation conversations. On one hand, cities work with developers to reduce parking demand and to manage parking supply so that vehicles do not spill out into the surrounding area and impede access to other land uses. On the other hand, extensive research shows that abundant, free, and convenient parking makes driving to a destination the first choice by making access by all other modes more difficult and uncomfortable or feel less safe. Providing parking that is available, cheap and convenient, while typically not achievable in an urban setting, may result in more vehicle trips, traffic congestion, and VMT. Therefore, Bellevue strives to:

- Manage the supply, demand, and use of public and on-street parking areas in accordance with the Curb Management Plan.
- Ensure that the private sector provides a supply of private parking and vehicle access to meet the needs of those who need to drive and park.
- Ensure that supply and management of private parking does not incentivize driving to the point that it degrades the performance of the overall multimodal system.

CURBSPACE MANAGEMENT

Bellevue has developed a Curb Management Plan to prioritize uses of curb space and to balance the demand for curb uses against available space. The plan provides a long-range vision for designating, maintaining, and operating curbspace in areas of high demand. The Curb Management Plan is flexible and implementation will evolve over time to help address on-street parking issues. Specific actions incorporated in the Curb Management Plan include monitoring on-street parking utilization, loading zone utilization and potential changes to allowed curb users, time limits, and paid

parking to balance supply and demand. These curb management strategies are particularly relevant in Type 1 and Type 2 PMAs as defined in the Mobility Implementation Plan.

The city manages on-street parking on local streets in residential neighborhoods through two types of restrictions: general parking restrictions, which apply to all vehicles; and residential parking zones, which require a permit to park a vehicle. Both types of restrictions are used to regulate parking in neighborhoods that experience non-residential parking from destinations such as businesses or schools and require City Council approval as well as majority support from the neighborhood. Such programs could be expanded to include other neighborhoods if parking impacts materialize.

OFF-STREET PARKING

Off-street parking supply will continue to increase as development occurs in accordance with Bellevue City Code requirements. The Bellevue Land Use Code⁵ requires a minimum number of parking spaces per net square foot, depending on the use of the property. Some uses also have a maximum parking limit, although for many uses no maximum is specified. A developer may also be required to provide off-street loading space to serve the site.

Residential uses that are proximate to light rail stations and other frequent transit network service have lower minimum parking requirements. Downtown Land Use Districts also have lower minimum parking requirements and are more restricted by parking maximums than other areas of Bellevue, in recognition of the high level of transit service, availability of other modes of transportation, and a mix of land uses that reduce the need to travel by vehicle.⁶

To manage the transportation system impacts related to supply of parking and associated vehicle congestion, Bellevue could consider lowering or eliminating minimum parking requirements and reducing the maximum parking requirements, in conjunction with encouraging transit use, walking, and biking. While parking impacts may arise in the short term (non-residential parking in adjacent neighborhoods), the city's curbspace management policies are equipped to limit significant impacts in the long run. The degree to which these strategies can mitigate traffic congestion impacts depends on the types of strategies and how aggressively they are implemented and enforced, as well as the context of the impacted

⁵ <https://bellevue.municipal.codes/LUC/20.20.590>.

⁶ <https://bellevue.municipal.codes/LUC/20.25A.080>.

area (for example, location, other available mobility options, and magnitude of the impact).

11.3.6 Safety Strategies

The City of Bellevue is guided by a commitment to Vision Zero, aligned with the statewide Target Zero plan, which aims to eliminate traffic deaths and serious injury collisions on city streets by 2030. Vision Zero is founded on the Safe Systems approach, which considers the design, infrastructure, and systemic issues that contribute to crashes. Bellevue's Vision Zero Strategic Plan coordinates existing efforts and new ideas, evaluates crash data, considers public concerns, and identifies strategies to reduce traffic fatalities and serious injuries. The program was approved for funding in Bellevue's 2021–2027 and 2023–2029 capital budgets. The city's Annual Action Plans are updated as new data become available. Progress toward Vision Zero goals is tracked through a collision dashboard and biennial progress reports.

Bellevue has implemented a wide range of traffic safety programs in support of its Vision Zero program that could be leveraged to address safety impacts as they arise. Ongoing safety programs include:

- Neighborhood Traffic Safety Services (NTSS) staff work with residents to improve traffic safety and reduce parking impacts.
- Traffic safety request forms can be filled out and submitted online to contact Bellevue with traffic safety concerns or requests.
- The collision reduction program includes annual reviews of crashes on city streets and identifies potential safety countermeasures available to improve safety.
- Crosswalk and sidewalk programs allow Bellevue residents to request new or improved pedestrian infrastructure.
- The School Safety Program includes school zone speed limit signs and School Pool and Walk & Roll to encourage walking and bicycling to school, as well as the PedBee educational program to teach safe travel tips to children.
- Rapid build data driven safety program funding implements safety countermeasures along High Injury Network (HIN) corridors.
- Road Safety Assessments (RSA), especially around schools, identify safety issues, particularly for people walking and bicycling.

- Leading Pedestrian Intervals at intersections give pedestrians a WALK signal to cross a street before the green light for vehicular traffic.
- Slow Zone Pilot tested lower speed limits in a pilot program neighborhood.
- Micromobility regulations expand access to mobility while addressing safety as new modes, such as e-scooters, emerge.
- The Vision Zero collision dashboard shows where and what type of collisions have occurred, providing data to understand the problem and develop a solution.
- Video analytics partnerships with private and non-profit organizations identify near-crash conflicts between vehicles, pedestrians, and bicyclists so that Bellevue can proactively identify safety improvements.

These safety programs demonstrate Bellevue’s commitment to proactively identify and then take action to resolve potential safety issues as they arise. Creating a safer transportation network could encourage travelers to use non-vehicle modes, helping to mitigate impacts related to traffic congestion such as System Intersection V/C and Primary Vehicle Corridor speed.

11.3.7 Transportation Mitigation Measures

This section outlines specific, programmatic transportation mitigation measures to address the impacts identified in the previous sections. The mitigation measures have their foundations in the plans, programs, and strategies described previously in this chapter. Mitigation measures are informed by the context of Performance Management Areas (PMAs), which are geographic areas of Bellevue defined in the MIP that have distinct land use patterns, mixes and intensities of development, and transportation options. The PMAs are summarized below:

- **PMA 1: Downtown, Wilburton-East Main, BelRed.** High-density, mixed-use areas with light rail and other frequent transit network service where walking, biking, and transit are key modes of access.
- **PMA 2: Crossroads, Eastgate, Factoria.** Medium-density, mixed-use areas that are served by frequent transit network routes. Walking, biking, and transit are viable mobility options for most parts of Type 2 PMAs.

- **PMA 3: Lower-density, predominantly residential areas.** The Type 3 PMA is characterized by residential areas with small-scale commercial nodes along arterials. Transit service is available, and frequent transit network service is available along some arterials. Due to separation of land uses, many walking trips are recreational in nature rather than to access daily needs. There are local bicycle facility connections to the regional bicycle facilities, commercial areas, and neighboring Type 1 or 2 PMAs.

To successfully accommodate the planned growth included in each of the alternatives and to mitigate transportation impacts, Bellevue, in partnership with developers and other agencies, will implement a broad spectrum of the improvements and strategies described in this section. Taken together, these mitigation measures will expand the transportation network for walking, biking, and transit; manage traffic congestion; strategically add vehicle capacity; improve safety; and reduce the need to drive to destinations.

The analysis indicated performance target gaps for Transit Travel Time ratios, System Intersection V/C ratios, Primary Vehicle Corridor travel speed, and state facility LOS as well as potential less-than-significant impacts on safety, and parking in Type 1, Type 2, and Type 3 PMAs, including the Wilburton study area. The degree of the potential gap progressively increases for Alternatives 1, 2, 3, and the Preferred Alternative. **Table 11-39** summarizes the mitigation measures that could be pursued to address the impacts.

TABLE 11-39 Mitigation Measures for Impacts Resulting from Action Alternatives

Type of Impact	Type 1 PMA	Type 2 PMA	Type 3 PMA
Transit Travel Time	Bellevue should continue to partner with King County Metro and Sound Transit. Improvements could include transit-only/HOV lanes on arterials, transit signal priority, and strong coordination to plan for the Link light rail 4 Line between South Kirkland and Issaquah, that will serve BelRed, Wilburton, Downtown, East Main, Factoria, and Eastgate. Innovative projects like the Bellevue College Connector in Eastgate is a good example of this multi-agency collaboration.		Transit Travel Time performance target gaps affect frequent transit network routes that traverse the Type 3 PMA, but there are no major transit nodes in the PMA. Bellevue should continue to work with partner transit agencies to implement strategic transit speed and reliability improvements within the Type 3 PMA to benefit service within the area and to enhance the performance of the overall transit system. Transit riders from the Type 3 PMA can benefit from these improvements both on routes that they are able to access by walking or bicycling, and also from park-and-ride and transit centers.
System Intersection V/C and Primary Vehicle Corridor Speed	Bellevue should focus primarily on completing and connecting the pedestrian and bicycle network to ensure there are multiple mobility options for people to get to their destinations, “expanded TDM” measures to further reduce SOV driving demand, Smart Mobility solutions on arterials and state highways, and parking code reforms to eliminate parking minimums near Link light rail stations, and potentially add further maximum parking limits to shift driving from the default mode of travel to a mode of necessity. Street or intersection capacity expansion should be a mitigation measure of “last resort” in the Type 1 PMAs given the secondary impacts on pedestrian and bicyclist comfort, access, and safety and the very limited available space to expand the street network.	Bellevue should focus primarily on completing and connecting the pedestrian and bicycle network to ensure there are multiple mobility options for people to get to their destinations, and “expanded TDM” to further reduce SOV driving demand. Smart Mobility solutions for city arterials are of key importance in Type 2 PMAs given busy arterials like Factoria Boulevard and 148th/150th Avenue. Further refinements in traffic signal timing could address Primary Vehicle Corridor performance target gaps. Given the close proximity of the Factoria and Eastgate areas to major WSDOT facilities, Smart Mobility solutions on state routes are also important. Vehicle capacity expansions	Bellevue should continue to complete and connect the pedestrian and bicycle network per the MIP within the Type 3 PMA. Smart Mobility solutions for city arterials are of major importance for arterials like 148th Avenue and Coal Creek Parkway, for example. Refinements in traffic signal timing could address Primary Vehicle Corridor performance target gaps even if there are still intersection V/C performance target gaps. Vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps.

Type of Impact	Type 1 PMA	Type 2 PMA	Type 3 PMA
		<p>may be warranted in limited and strategic areas if the other project concepts or strategies do not adequately address vehicle performance target gaps. However, any capacity expansion should be weighed against safety and multimodal access impacts.</p>	
Safety	<p>Bellevue should continue to implement countermeasures and strategies consistent with its Vision Zero Action Plan and Safe Systems approach, with a particular focus on reducing risks to vulnerable pedestrians and bicyclists. Priority should be placed on improving the safety of people walking or bicycling along the street through closing sidewalk gaps, installing mid-block crossings, providing low-stress bicycle facilities, and reducing arterial crossing distances and creating high-visibility crosswalks at intersections.</p>	<p>Bellevue should continue to implement countermeasures and strategies consistent with its Vision Zero Action Plan and Safe Systems approach with a particular focus on reducing risks to vulnerable pedestrians and bicyclists. Managing vehicle speeds on arterials will be a key element of improving safety overall.</p>	
Parking	<p>As Type 1 PMAs redevelop with a greater intensity and mix of land uses, on-street parking demand may exceed supply during peak periods, which can be mitigated through interventions identified in the Curb Management Plan.</p>	<p>Type 2 PMAs, with less intensity and mix of land uses than in Type 1 PMAs, may experience parking impacts around the fringes and along smaller streets within the PMA. Bellevue should continue to implement robust parking and curbspace management programs that can mitigate parking spillover impacts.</p>	<p>As the city redevelops with a greater intensity and mix of land uses, particularly in Type 1 and Type 2 PMAs, there could be parking impacts on city streets within the Type 3 PMA. The city has robust parking and curbspace programs in place that can mitigate parking impacts.</p>

Type of Impact	Type 1 PMA	Type 2 PMA	Type 3 PMA
State Facility LOS	Bellevue should continue to coordinate and partner with WSDOT on state transportation investments to improve regional mobility. Specific examples could be continued collaboration on implementing elements of the I 405 Master Plan, including the South Downtown I 405 Access Study and the NE 6th Street Extension, as well as the SR 520/124th Avenue NE interchange. Bellevue and WSDOT have a long history of implementing improvements to state routes through the city. Bellevue can also facilitate the implementation of Smart Mobility strategies on state facilities through sharing of travel data and using Bellevue’s communications channels to share information with travelers. Smart Mobility on state facilities is an important strategy to move more people and address regional travel needs.		
All	Bellevue should also pursue “Expanded TDM” requirements to further reduce SOV driving demand, which will reduce overall traffic demand on state facilities. Similarly, considering parking code reforms to eliminate parking minimums near Link light rail stations and potentially add further maximum parking limits to shift driving from the default mode of travel to a mode of necessity would benefit state facilities.		

11.4 Significant and Unavoidable Adverse Impacts on Transportation

This section identifies whether any significant and unavoidable adverse impacts on transportation would occur under the Action Alternatives. **All Action Alternatives are expected to have significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities** (with other potential impacts expected to be at a less than significant level).

With implementation of the mitigation measure approach outlined in the previous section, it is expected that Bellevue could manage some of those impacts over the course of the decades it would take to reach full build-out. As development occurs, Bellevue will determine the capital and programmatic improvements best suited to address the conditions that materialize. Capital projects will be identified in the Transportation Facilities Plan, a fiscally constrained plan prioritizing project needs over the subsequent 12-year period; the Transportation Facilities Plan is updated every 2 to 3 years. In addition, the city will continue to use the MIP when developing and administering the city’s policies, codes, standards, regulations, and plans.

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.**



CHAPTER 12 Cumulative Impacts

12.1 Updates to the DEIS

There are no updates to the DEIS analysis related to cumulative impacts. Also refer to Chapter 15, *Corrections and Clarifications*, of this FEIS for more information.

12.2 Cumulative Impact Evaluation

The environmental review contained in this FEIS takes a conservative approach by assuming growth to “build-out” capacity under the No Action Alternative and under each of the Action Alternatives. It is not expected that this level of growth would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the alternatives. In addition, the EIS includes land use assumptions for the rest of the region, based on Puget Sound Regional Council (PSRC) growth targets, where applicable and reasonably foreseeable.

Any cumulative impacts associated with additional regional growth, citywide growth, or growth anticipated by **Wilburton Vision Implementation beyond that evaluated in this EIS is merely speculative and need not be considered as part of this programmatic environmental review.**

INTENTIONALLY BLANK

CHAPTER 13 Distribution List

TRIBES

- The Duwamish Tribe
- The Muckleshoot Indian Tribe
- The Puyallup Tribe of Indians
- The Snoqualmie Indian Tribe
- Squaxin Island Tribe
- Stillaguamish Tribe of Indians
- The Suquamish Tribe
- The Tulalip Tribes

FEDERAL

- U.S. Army Corps of Engineers
- U.S. Dept. of Housing and Urban Development
- U.S. Dept. of Transportation – Federal Highway Administration
- U.S. Environmental Protection Agency – Region 10

STATE

- WA State Dept. of Agriculture
- WA State Dept. of Archaeology and Historic Preservation
- WA State Dept. of Commerce
- WA State Dept. of Ecology
- WA State Dept. of Fish and Wildlife
- WA State Dept. of Health
- WA State Dept. of Natural Resources
- WA State Dept. of Social and Health Services

- WA State Dept. of Transportation
 - WA State Dept. of Transportation-NW Region
 - WA State Parks and Recreation Commission
 - WA State Recreation Conservation Office
-

REGIONAL

- King County Boundary Review Board
 - King County Dept. of Permitting and Environmental Review
 - King County Road Services
 - King County Historic Preservation Program
 - King County Metro Transit Environmental Planning
 - King County Natural Resources and Parks
 - Office of the King County Executive
 - Public Health-Seattle & King County
 - Puget Sound Clean Air Agency
 - Puget Sound Partnership
 - Puget Sound Regional Council
 - Sound Transit
-

OTHER MUNICIPALITIES

- City of Beaux Arts
 - City of Clyde Hill
 - City of Issaquah
 - City of Kirkland
 - City of Medina
 - City of Mercer Island
 - City of Newcastle
 - City of Redmond
 - City of Renton
-

SERVICE PROVIDERS, SCHOOLS, UTILITIES, FRANCHISE SERVICES

- Bellevue College
- Bellevue School District No. 405
- Cascade Water Alliance
- Comcast
- Issaquah School District
- Lake Washington School District
- Puget Sound Energy
- Renton School District

INDIVIDUALS

- M. J. Acker
- C. Adams
- E. Adams
- M. Adams
- J. Adcock
- C. Allred
- J. Altman
- P. Amador
- E. Anderson
- S. Anderson
- E. Anthonise
- A. Atwell
- A. Atwood
- A. Babadjanov
- L. Bachman
- J. Bae
- W. Baker
- L. Balent
- R. Bannecker
- G. Bansal
- A. Barhudarian
- H. Barker
- W. Barnes
- L. B. Barreto
- N. Baullinger
- C. Bauman
- P. Bazley
- J. Beffa
- H. Behrens-Benedict
- C. Bendix
- R. Bennett
- H. Benz-Merritt
- C. X. Bi
- B. Bird
- M. Bogin
- E. Bolles
- J. Bowles
- C. Boyd
- B. Braun
- P. Brown
- W. Bruning
- K. Bryant
- C. Buchanan
- D. Burg
- R. Butenko
- L. C
- D. Cagle
- N. Campbell
- B. Carey
- G. Carnes
- C. Cawthon
- J. Chauhan
- F. Cheng
- D. Choi
- S. Cobert
- A. Cole
- T. Colombo
- J. Cooledge
- J. Cooper
- D. Curran
- J. Darvish
- N. De Maar
- H. Dean
- R. Dearth
- R. Decher
- S. Demonnin
- D. Deutsch
- A. Dietemann
- Y. Ding
- K. Dobbe
- L. Dong
- J. Doyle
- T. Doyle
- D. Dubofsky
- Ca. Dugoni
- Cr. Dugoni
- J. Dugoni
- D. Duitch
- J. Duntz
- N. Duryea
- L. Edson
- H. Edwards
- S. Engen
- I. Ensing
- H. Ferris
- D. Fick
- B. Finkbeiner
- H. Finkbeiner
- S. Fisher
- G. Floss
- M. Foltz
- N. Foroutan
- M. Freitag
- C. Fu
- P. Fuld
- J. Gao
- M. Gardner
- L. Ge
- L. Geller
- S. Goett
- K. Gonzalez
- D. Goodwin
- P. Gunther
- Z. Guo

- R. Haagens
- J. Hammond
- B. Hansen
- E. Hansen
- N. Hansen
- S. Harms
- F. Harold
- E. Hartford
- R. Hauser
- M. Haywood
- S. Heath
- B. Helg
- K. Helmgren
- C. Hemnes
- J. Hempelmann
- B. Henderson
- J. Hirsch
- M. Hirsch
- L. Hubacka
- B. Hughes
- R. Hughes
- M. L. Hui
- B. Hummer
- D. Hutson
- C. Isaacson
- A. Jackson
- N. Jacobs
- S. Jamieson
- P. Jia
- Y. Jiang
- C. P. Johnson
- P. Johnston
- G. Kalmus
- Z. Kalthoum
- R. Kapoor
- J. Keller
- M. Kenny
- C. Khatri
- R. Kinnestrand
- C. Kinsella
- C. Klansnic
- M. Kruse
- S. Kunkel
- A. Lachini
- D. Lacy
- A. Lahmoudi
- N. Lande
- S. Lande
- C. Langer
- M. Larimer
- J. Lauinger
- E. Lee
- J. Lee
- M. Leingang
- S. Leszynski
- M. Levine
- K. Linn
- R. Lipscomb
- L. Lopez
- F. Luan
- C. Ludwig
- D. Mahon
- M. Makar
- K. Marashi
- C. Marks
- W. Marks
- D. Marsh
- J. Marshall
- D. Mathews
- M. Matson
- K. Mauden
- O. Mawjee
- K. Mckenna
- R. McMurtrey
- C. Meinecke
- F. Miller
- T. Miller
- V. Miller
- L. Millikan
- S. Mobley
- K. Morgan
- K. Morris
- E. Morshedzadeh
- B. Mosby
- M. Mostov
- J. Mucklestone
- C. Munson
- N. Myers
- M. Nash
- P. Neher
- M. Niemann
- P. Nienaber
- B. Nordstrom
- K. Nye
- A. Olsen
- Ga. Olsen
- Gl. Olsen
- L. Olsen
- C. Olson
- E. Orłowska-Emadi
- B. Parker
- S. Parsons
- K. Paulich
- P. Perkins
- L. Peterson
- P. Bazley
- S. Pistorese
- D. Plummer
- L. Polt
- E. Powell

- T. Powell
- D. Price
- Al. Proskurin
- An. Proskurin
- J. Quarre
- C. Randels
- J. Rasmussen
- V. Rauscher
- J. Razore
- D. Renn
- H. Ressler
- J. Richardson
- A. Rittenhouse
- D. Roberts
- E. Rodriguez
- C. Roeter
- D. Roeter
- R. Roeter
- J. Roskill
- A. Ross
- G. Saaris
- M. Saxena
- K. Sayers
- S. Scanlan
- N. Schaffner
- T. Schmeil
- S. Schwab
- S. Schwartz
- T. Schwartz
- D. Scott
- W. Scott
- E. Segat
- L. Sferra
- L. Shulman
- T. Siegel
- K. Singh
- V. Skordal
- S. Slavin
- C. Smith
- T. Solomon
- L. Stabler
- T. Stabler
- A. Stevens
- L. Stivers
- K. Stoner
- C. Sumadiwirya
- A. Surbridge
- D. Tanner
- J. Taylor
- D. Thompson
- D. Tillman
- A. Ting
- D. Tokuno
- R. S. Tomas
- J. Totis
- A. Tran
- F. Tsang
- L. Tsang
- J. Tzucker
- L. Ulrich
- S. Valstar
- J. Van Duzor
- S. VanDerhoef
- S. Verthein
- T. Vincent
- T. Wahl
- R. Wallace
- C. Wang
- C-C. Wang
- Je. Wang
- Ju. Wang
- L. Wang
- W. Wang
- Ya. Wang
- Yi. Wang
- K. Weir
- L. White
- P. White
- R. White
- J. Whitney
- T. Wicherath
- M. Wickens
- R. Wiess
- M. Wiley
- S. Williams
- S. Williams
- D. Woosley
- T.J. Woosley
- D. Wright
- Ji. Wu
- Jo. Wu
- L. Wu
- W. Wu
- Z. Wu
- S. Xu
- M. Ye
- K. Yellman
- L. Yin
- S. Zhang
- Z. Zhang
- T. Zhedon
- A. Zimmerman

ORGANIZATIONS

- 116th Ave Coalition
- 1515 Bellevue Way LP
- 300 Trees
- Aegis Senior Communities LLC
- Alco Investment Company
- Alexandria Real Estate Equities, Inc.
- Amazon
- American Capital Group
- Artma Pop-Up
- Bellecrest Neighborhood Association
- Bellevue Chamber of Commerce
- Bellevue Chamber Planning, Land Use, Sustainability and Housing (PLUSH) Committee
- Bellevue College
- Bellevue Downtown Association
- Bellevue Technology Center
- Bellevue Towers Homeowner Association
- BelRed Design Center LLC
- Berg Holdings
- Beta-Bellevue Auto Center LLC
- Blu Compass LLC
- BRIDGE Housing
- Bridle Trails Community Club
- Brierwood Center LLC
- Careage and Mission Healthcare Investments LLC
- Clover Capital Commercial Real Estate
- Coast Hospitality LLC
- Complete Streets Bellevue
- Compton Design Office
- Continental Properties
- DASH dba CIRC
- Davis Investors and Management LLC
- Ditty Properties
- Earth and Climate Action Ministry East Shore Unitarian Church
- Eastridge Properties LLC
- Eastside Affordable Housing Coalition and Housing Development Consortium
- Eastside Housing Equity Coalition
- Eastside Transportation Association
- Eastside Urbanism
- EGBW38R Owner LLC
- Elufa LLC
- Essex Property Trust, Inc.
- Ferris Advisors
- Futurewise
- GIS Companies
- Habitat for Humanity of Seattle-King & Kittitas Counties
- Hal Woosley Properties, Inc.
- Heartland LLC
- Henbart LLC and Gorlick Properties
- Hopelink
- Housing Development Consortium of Seattle-King County
- IS Property Investments LLC

- Kemper Development Company
- KG Investment Properties
- KORE Bellevue Technology Center, Inc.
- KTB Properties
- Lee & Associates
- Lindsey Properties LLC
- Longwell Company
- Master Builder Association of King and Snohomish Counties
- McCullough Hill
- Microsoft
- Montvue Place LLC
- MRM Capital
- N124 Holdings LLC
- NAIOP Washington State
- Newport Hills Community Club
- Nine Lake Bellevue Owner's Association
- Overlake Medical Center
- Parkay Investments
- People for Climate Action
- Phantom Lake Homeowners Association
- PMF Capital Management LLC
- Rainier Pacific Properties
- RCJ Properties LLC
- Rockwood Capital
- Scarff Law Firm
- SRM
- Sterling Realty Organization
- Sternoff LLC
- Swire Coca-Cola
- Talon Private Capital
- Tharsis Law
- The Bellevue Collection
- Touchstone LLC
- Transforming Age
- Trinity Real Estate LLC
- Tristar Property Development Company LLC
- Urban Renaissance Group
- Vanir Construction Management Inc.
- Wallace Properties, Inc.
- Weber Thompson
- Wig Properties LLC
- Wilburton Community Association
- Wilburton Property Owners Group
- Woodridge Community Association
- Wright Runstad & Company
- WR-SRI 120th LLC
- WTM Property Owner LLC

DEIS COMMENTERS

- Persons providing scoping comments and DEIS comments (see FEIS Appendix N, *Response to Comments*).

INTENTIONALLY BLANK

CHAPTER 14 References

This chapter includes references for citations for both the DEIS and the FEIS, for completeness.

Chapter 1, Introduction and Summary

- City of Bellevue. 2018a. Wilburton Commercial Area Land Use and Transportation Project Draft Environmental Impact Statement. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/wilburton>.
- City of Bellevue. 2018b. Wilburton Commercial Area Study. Prepared by NBBJ. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/WCA%20Report%20Final%20Published%20Version%20with%20Errata.pdf.
- City of Bellevue. 2020. Vision Zero Strategic Plan. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/vision-zero-strategic-plan-120120.pdf.
- City of Bellevue. 2021. Bellevue City Council 2021-2023 Vision & Priorities. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/Council-Vision-Priorities-2021.pdf.
- City of Bellevue. 2022a. Comprehensive Plan Periodic Update Scope of Work Summary. Accessed March 2023. <https://bellevue.legistar.com/View.ashx?M=F&ID=10549908&GUID=BDA37AF2-CF3E-4645-AD6A-E5AE80173C42>.

- City of Bellevue. 2022b. Mobility Implementation Plan. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Bellevue_MIP_Vol1%262_8.1.22.pdf.
- City of Bellevue. 2022c. 2022-2033 Transportation Facilities Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/City%20of%20Bellevue%202022-2033%20Transportation%20Facilities%20Plan_0.pdf.
- City of Bellevue. 2023a. Bellevue 2044 Environmental Review. Accessed March 2023. <https://bellevuewa.gov/2044-environmental-review>.
- City of Bellevue. 2023b. Curb Management Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Bellevue_CMP.pdf.
- City of Bellevue Transportation Department. 2021. South Downtown I-405 Access Study Report. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/South%20Downtown%20Access%20Study%20Final%20report%20July2021.pdf.
- Community Attributes Inc. 2022. City of Bellevue Housing Needs Assessment. Prepared for City of Bellevue. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Bellevue%202022%20HNA%20Report.pdf.
- King County. 2021a. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023. https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- King County. 2021b. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.
- PSRC (Puget Sound Regional Council). 2020. VISION 2050. Prepared by Puget Sound Regional Council, Seattle, WA. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-11/vision-2050-plan.pdf>.
- WSDOT (Washington State Department of Transportation). 2002. I-405 Corridor Program Final Recommendation Report. Accessed April 2023. <https://wsdot.wa.gov/sites/default/files/2021-11/I405RecommendationReport2002.pdf>.

Chapter 2, Preferred Alternative

- City of Bellevue. 2015. Wilburton/Grand Connection Project Draft Council Principles. Accessed March 2023. <https://bellevue.legistar.com/View.ashx?M=F&ID=4159805&GUID=BE3E959B-D8A4-4A73-BA35-201A221C60EC>.
- City of Bellevue. 2016. Wilburton Commercial Area Existing Conditions Report. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/Wilburton_ExistingConditions.pdf.
- City of Bellevue. 2018. Wilburton Commercial Area Land Use and Transportation Project Draft Environmental Impact Statement. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/wilburton>.
- City of Bellevue. 2020. Economic Development Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Economic%20Development%20Plan%20%28Full%20File%2C%20Adopted%2011-2-2020%29.pdf.
- City of Bellevue. 2023a. Scoping Comment Summary-Final. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Bellevue_CompPlanEIS_ScopingSummary_FINAL.pdf.
- City of Bellevue. 2023b. Scoping Comment Summary Attachments. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Scoping%20Attachments%20FINAL_0.pdf.
- King County. 2021a. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023. https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- King County. 2021b. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.
- PSRC (Puget Sound Regional Council). 2019. VISION 2050 Draft Supplemental Environmental Impact Statement. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-02/v2050-draft-seis.pdf>.

PSRC (Puget Sound Regional Council). 2020a. VISION 2050. Prepared by Puget Sound Regional Council, Seattle, WA. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-11/vision-2050-plan.pdf>.

PSRC (Puget Sound Regional Council). 2020b. VISION 2050 Final Supplemental Environmental Impact Statement. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-02/v2050finaleis-march2020.pdf>.

Chapter 3, Land Use

City of Bellevue. N.d. Critical Area Handbook: Restoring, Enhancing, and Preserving. Prepared by the Watershed Company. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/ca_handbook.pdf.

City of Bellevue. 2015a. Bel-Red Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/S01.BelRed2010May2017Binder2.pdf.

City of Bellevue. 2015b. Bellevue Comprehensive Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.

City of Bellevue. 2015c. Downtown Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/SP04.DowntownPlan_2015.pdf.

City of Bellevue. 2015d. Eastgate Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/SP05.Eastgate_2015.pdf.

City of Bellevue. 2018. Shoreline Master Program. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/file/2019-07/SMP%202018%200312no%20heron%20boat.indd_.pdf.

City of Bellevue. 2019. Bellevue Map Viewer powered by ESRI. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/ITD/services/maps>.

City of Bellevue. 2022. Downtown Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Downtown%202022.pdf.

- City of Bellevue. 2023. Comprehensive Land Use Plan Map. Accessed March 2023. https://apps.bellevuewa.gov/gisdownload/PDF/Planning/complan2str_b_11x17.pdf.
- CoStar. 2023a. Triple net rent. Accessed March 2023 through CoStar Database.
- CoStar. 2023b. Total Vacancy Rates, Q1 2006-Q1 2023 YTD. Accessed March 2023 through CoStar Database.
- Federal Reserve. 2013. The Great Recession. Written by Robert Rich, Federal Reserve Bank of Cleveland. Accessed March 2023. <https://www.federalreservehistory.org/essays/great-recession-of-200709>.
- King County. 2018. King County Parcel Viewer. Accessed March 2023. <https://gismaps.kingcounty.gov/parcelviewer2/>.
- King County. 2021a. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023. https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- King County. 2021b. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.
- King County Assessor's Office. 2021. Localscape: Putting King County in Focus. Powered by Spatialist. Accessed March 2023. <https://localscape.property/#kingcountyassessor/>.
- PSRC (Puget Sound Regional Council). 2020. VISION 2050. Prepared by Puget Sound Regional Council, Seattle, WA. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-11/vision-2050-plan.pdf>.
- PSRC (Puget Sound Regional Council). 2020. VISION 2050 Multicounty Planning Policies. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-02/vision-2050-mpps.pdf>.
- USGBC (U.S. Green Building Council). 2023. LEED Appendix 1. Use Types and Categories. Accessed March 2023. <https://www.usgbc.org/credits/new-construction-existing-buildings-commercial-interiors-core-and-shell-schools-new-constr-2>.
- USGBC (U.S. Green Building Council). 2023. LEED Surrounding Density and Diverse Uses. Accessed March 2023. <https://www.usgbc.org/credits/core-shell/v2012/ltc4>.

Chapter 4, Plans and Policies

- City of Bellevue. 2014. Bellevue Transit Master Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/TMP-Bellevue-Transit-Master-Plan-2014.pdf.
- City of Bellevue. 2015a. Bel-Red Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/SP01.BelRed2010.pdf.
- City of Bellevue. 2015b. Bellevue Comprehensive Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.
- City of Bellevue. 2015c. Bellevue Storm and Surface Water System Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/Storm%20and%20Surface%20Water%20System%20Plan%20Table%20of%20Contents.pdf.
- City of Bellevue. 2018. Shoreline Master Program. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/file/2019-07/SMP%202018%200312no%20heron%20boat.indd_.pdf.
- City of Bellevue. 2020a. 2021-2027 Capital Investment Program Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/CIP%20%202021-2022%20Adopted%20Budget.pdf.
- City of Bellevue. 2020b. Economic Development Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Economic%20Development%20Plan%20%28Full%20File%2C%20Adopted%2011-2-2020%29.pdf.
- City of Bellevue. 2021. Wilburton/NE 8th Street Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/SP14.WilburtonNE8th_2022_0104.pdf.
- King County. 2021a. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023. https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- King County. 2021b. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.

PSRC (Puget Sound Regional Council). 2020. VISION 2050. Prepared by Puget Sound Regional Council, Seattle, WA. Access March 2023. <https://www.psrc.org/sites/default/files/2022-11/vision-2050-plan.pdf>.

Chapter 5, Population and Employment

ACS (American Community Survey). 2021a. 5-year Estimates: Age and Language (Table S0601). Accessed March 2023. <https://data.census.gov/>.

ACS (American Community Survey). 2021b. 5-year Estimates: Household Size (Table S1101). Accessed March 2023. <https://data.census.gov/>.

ACS (American Community Survey). 2021c. 5-year Estimates: Income (Table S1901). Accessed March 2023. <https://data.census.gov/>.

ACS (American Community Survey). 2021d. 5-year Estimates: Tenure and Household Size (Table DP04). Accessed March 2023. <https://data.census.gov/>.

ACS (American Community Survey). 2021e. 5-year Estimates: Occupancy (Table B25002). Accessed March 2023. <https://data.census.gov/>.

Census (U.S. Census Bureau). 2020. DEC Redistricting Data: Hispanic or Latino, and Not Hispanic or Latino By Race (Table P2). Accessed March 2023. <https://data.census.gov/>.

City of Bellevue. 2015. Bellevue Comprehensive Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.

City of Bellevue. 2020. Economic Development Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Economic%20Development%20Plan%20%28Full%20File%2C%20Adopted%2011-2-2020%29.pdf.

City of Bellevue. 2023. Air Quality and Land Use Planning: A Review of the Literature on High-Volume Roadways, Health Effects, and Mitigation Strategies. Prepared by the City of Bellevue and Broadview Planning. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Air%20Quality%20and%20Land%20Use%20Planning%20Report%20FINAL.pdf.

- EPA (U.S. Environmental Protection Agency). 2021. EJScreen. Accessed March 2023. <https://ejscreen.epa.gov/mapper/>.
- ESRI. 2022. Esri Community Profile: Wilburton Study Area. Accessed through Esri Business Analyst.
- King County. 2021. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023. https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- OFM (Washington Office of Financial Management). 2022. April 1 Population Estimates. Accessed March 2022. ofm.wa.gov/washington-data-research/population-demographics/population-estimates/april-1-official-population-estimates.

Chapter 6, Aesthetics

- City of Bellevue. 2015. Bellevue Comprehensive Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.
- City of Bellevue. 2021. Wilburton/NE 8th Street Subarea Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/SP14.WilburtonNE8th_2022_0104.pdf.
- City of Bellevue. 2022. Preliminary Community Engagement Report Phase 1- Spring 2022 Report for the 2024 Comprehensive Plan Periodic Update. Accessed March 2023. https://s3-us-west-1.amazonaws.com/ehq-production-us-california/5de63dccb332c82b97dd619af7e45a20d0752568/original/1668103946/6d6799ccfb353194c05e6a8e3bb2d8c9_Bellevue_2044_-_Phase_1_Community_Engagement_Report.pdf.
- City of Bellevue. 2023. Photos of Bellevue buildings. Provided by City of Bellevue Staff and ESA.

Chapter 7, Housing

- ARCH (A Regional Coalition for Housing). 2023. Housing Trust Fund. Accessed March 2023. <https://www.archhousing.org/housing-trust-fund>.

- CAI (Community Attributes Inc.). 2023. City of Bellevue Housing Economic Policy Analysis: Phase 1 Existing Conditions Report. Prepared for City of Bellevue on January 19, 2024. See Appendix L.
- Census (U.S. Census Bureau). 2022. Data Releases. Accessed March 2023. <https://www.census.gov/programs-surveys/acs/news/data-releases.html>.
- City of Bellevue. 2015. Bellevue Comprehensive Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>.
- City of Bellevue. 2017. City of Bellevue Affordable Housing Strategy. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/FINAL_Bellevue%20Affordable%20Housing%20Strategy_withres.pdf.
- City of Bellevue. 2020. Economic Development Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Economic%20Development%20Plan%20-%28Full%20File%2C%20Adopted%2011-2-2020%29.pdf.
- Community Attributes Inc. 2022. City of Bellevue Housing Needs Assessment. Prepared for City of Bellevue. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Bellevue%202022%20HNA%20Report.pdf.
- HUD (U.S. Department of Housing & Urban Development Office of Policy Development and Research). 2022a. Consolidated Planning/CHAS Data 2015-2019. Accessed March 2023. <https://www.huduser.gov/portal/datasets/cp.html>.
- HUD (U.S. Department of Housing & Urban Development Office of Policy Development and Research). 2022b. Income Limits. Accessed March 2023. <https://www.huduser.gov/portal/datasets/il.html>.
- HUD (U.S. Department of Housing & Urban Development Office of Policy Development and Research). 2023. CHAS: Background. Previously available: https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html. Data available starting September 5. at <https://www.huduser.gov/portal/datasets/cp.html>.
- King County. 2018. King County Parcel Viewer. Accessed March 2023. <https://gismaps.kingcounty.gov/parcelviewer2/>.

- King County. 2021a. Countywide Planning Policies. Prepared by King County, Seattle, WA. Accessed March 2023.
https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021_CPPs-Adopted_and_Ratified.ashx?la=en.
- King County. 2021b. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.
- King County Assessor's Office. 2021. Localscape: Putting King County in Focus. Powered by Spatialist. Accessed March 2023.
<https://localscape.property/#kingcountyassessor/>.
- MRSC (Municipal Research and Services Center of Washington). 2021. "Changing Your Zoning Code to Accommodate Housing and Shelters for the Homeless". Accessed March 2023.
<https://mrsc.org/stay-informed/mrsc-insight/june-2021/changing-your-zoning-code-for-homeless-housing>.
- PSRC (Puget Sound Regional Council). 2020. VISION 2050 Multicounty Planning Policies. Accessed March 2023.
<https://www.psrc.org/sites/default/files/2022-02/vision-2050-mpps.pdf>.
- PSRC (Puget Sound Regional Council) 2023. Displacement Risk Mapping. Accessed March 2023. <https://www.psrc.org/our-work/displacement-risk-mapping>.
- Regional Affordable Housing Task Force. 2019. Final Report and Recommendations for King County, WA. Accessed March 2023.
https://kingcounty.gov/~media/initiatives/affordablehousing/documents/report/RAH_Report_Print_File_Updated_10,-d,-28,-d,-19.ashx?la=en.
- Zillow. 2023. Zillow Home Value Index Tool. Accessed February 2022.
<https://www.zillow.com/home-values/102001/united-states/>.

Chapter 8, Air Quality

CARB (California Air Resources Board). 2022. AB 617 Community Air Protection Incentives Status Reports. Accessed February 2023.

<https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives/ab-617-community-air-protection-incentives#:~:text=California%20Air%20Resources%20Board,-Main%20navigation&text=Specifically%2C%20AB%20617%20directed%20CARB,variety%20of%20strategies%20including%20incentives.>

City of Bellevue. 2020. Environmental Stewardship Plan 2021-2025.

Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Enviornmental%20Stewardship%20Plan_Adopted.pdf.

City of Bellevue. 2021. City of Bellevue Environmental Performance

Dashboard. <https://cobgis.maps.arcgis.com/apps/MapSeries/index.html?appid=be30baa631864324bd2119db1b48514e>.

City of Bellevue. 2023. Air Quality and Land Use Planning: A Review of

the Literature on High-Volume Roadways, Health Effects, and Mitigation Strategies. Prepared by the City of Bellevue and Broadview Planning. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Air%20Quality%20and%20Land%20Use%20Planning%20Report%20FINAL.pdf.

Ecology (Washington State Department of Ecology). 2022.

Washington State Greenhouse Gas Emissions Inventory: 1990-2019 Publication 22-02-054. Accessed March 2023.

<https://apps.ecology.wa.gov/publications/documents/2202054.pdf>.

Ecology (Washington Department of Ecology). 2023. Tracking

Greenhouse Gasses. Accessed March 2023.

<https://ecology.wa.gov/Air-Climate/Reducing-Greenhouse-Gas-Emissions/Tracking-greenhouse-gases>.

EPA (U.S. Environmental Protection Agency). 2022a. Our Nation's Air

Flyer. Accessed March 2023.

https://gispub.epa.gov/air/trendsreport/2022/documentation/AirTrends_Flyer.pdf.

EPA (U.S. Environmental Protection Agency). 2022b. Our Nation's Air:

Trends through 2021. Accessed March 2023.

<https://gispub.epa.gov/air/trendsreport/2022/#home>.

- Federal Register. Volume 61, No. 113, Tuesday June 11, 1996, page 29515. Accessed March 2023. <https://www.govinfo.gov/content/pkg/FR-1996-06-11/pdf/96-14679.pdf#page=1>.
- King County. 2021. 2020 King County Strategic Climate Action Plan. Accessed March 2023. <https://your.kingcounty.gov/dnrp/climate/documents/scap-2020-approved/2020-scap-reducing-ghg-emissions-section.pdf>.
- King County. 2022a. King County Communitywide Geographic Greenhouse Gas Emissions- Puget Sound Regional Emissions Analysis. Produced by Cascadia Consulting Group. Accessed March 2023. <https://your.kingcounty.gov/dnrp/climate/documents/2022/king-county-geographic-ghg-emissions-inventory-and-wedge-report-09-2022.pdf>.
- King County. 2022b. Geographic GHG Emissions Inventory Database. Accessed March 2023. PowerBI database accessible at <https://kc1.sharepoint.com/:u:/t/DNRPa/EZ7hxHhEx2FLpuRtRAVbWb4BSDLkeOrqIQMgvMyy1xd-wQ?e=7gu1uL>.
- PSCAA (Puget Sound Clean Air Agency). 2014. Highly Impacted Communities. Written by Tania Tam Park, et. al. Accessed March 2023. <https://pscleanair.gov/DocumentCenter/View/2323/Highly-Impacted-Communities-HI-C-ReportPDF?bidId=>.
- PSCAA (Puget Sound Clean Air Agency). 2022. 2021 Air Quality Data Summary. Accessed March 2023. <https://pscleanair.gov/DocumentCenter/View/4828/Air-Quality-Data-Summary-2021-PDF?bidId=>.
- PSRC (Puget Sound Regional Council). 2020. VISION 2050. Prepared by Puget Sound Regional Council, Seattle, WA. Accessed March 2023. <https://www.psrc.org/sites/default/files/2022-11/vision-2050-plan.pdf>.
- PSRC (Puget Sound Regional Council). 2022. 2022-2050 Regional Transportation Plan. Accessed March 2023. <https://www.psrc.org/media/5934>.
- WSDOT (Washington State Department of Transportation). 2022. Environmental Manual M 31-11.26. Accessed March 2023. <https://www.wsdot.wa.gov/publications/manuals/fulltext/M31-11/em.pdf>.

Chapter 9, Noise

FHWA (Federal Highway Administration). 2023. FHWA Noise Barrier Handbook. Accessed March 2023.

https://www.fhwa.dot.gov/Environment/noise/noise_barriers/design_construction/design/design00.cfm.

HUD (United State Department of Housing and Urban Development). 2009. The Noise Guidebook. Accessed April 2023:

<https://www.hudexchange.info/resource/313/hud-noise-guidebook/>.

King County. 2021. King County Urban Growth Capacity Report.

Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.

Seltenrich, Nate. 2017. Inequality of Noise Exposures: A Portrait of the United States, Environmental Health Perspectives, September. Accessed April 2023:

<https://ehp.niehs.nih.gov/doi/10.1289/ehp2471>.

WSDOT (Washington State Department of Transportation). 2020.

2020 Traffic Noise Policy and Procedures. Accessed March 2023.

<https://wsdot.wa.gov/sites/default/files/2021-10/ENV-ANE-NoisePolicy2020.pdf>.

WSDOT (Washington State Department of Transportation). 2022.

Environmental Manual M 31011.26, Chapter 446 Noise. Accessed

March 2023. <https://wsdot.wa.gov/publications/manuals/fulltext/M31-11/446.pdf>.

Chapter 10, Public Services and Utilities

Bellevue Fire Department. 2012. Standards of Response Coverage.

Accessed March 2023.

https://bellevuewa.gov/sites/default/files/media/pdf_document/Standards%20of%20Coverage.pdf.

Bellevue Fire Department. 2021. 2021 Annual Report. Accessed

March 2023. https://bellevuefirefoundation.org/wp-content/uploads/2022/06/BFD_2021_Annual_Report.pdf.

Bellevue Fire Department. 2022. "Fire Station 10". Accessed March

2023. <https://bellevuewa.gov/city-government/departments/fire/about/fire-stations/fire-station-10>.

- Bellevue Fire Department. 2023. "Emergency Medical Services". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/fire/medical>.
- Bellevue Parks & Community Services. 2016. Bellevue Parks & Open Space System Plan 2016. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/parks-open-space-plan-2016.pdf.
- Bellevue Police Department. 2021. 2021 Report to the Community. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/police/about-police/annual-reports>.
- Bellevue Police Department. 2023. "About Police". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/police/about-police>.
- Bellevue School District. 2023. Planning for the Future: School Consolidation. Accessed March 2023. [https://go.boarddocs.com/wa/bsd405/Board.nsf/files/CNW2UL03E3E8/\\$file/Planning%20for%20the%20Future%20Board%20Report.pdf](https://go.boarddocs.com/wa/bsd405/Board.nsf/files/CNW2UL03E3E8/$file/Planning%20for%20the%20Future%20Board%20Report.pdf).
- Bellevue Utilities Department. 2014. Wastewater System Plan. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/utilities-plans-and-reports/wastewater-system-plan>.
- Bellevue Utilities Department. 2016. Water System Plan. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/utilities-plans-and-reports/water-system-plan>.
- Bellevue Utilities Department. 2022. 2023-2029 Capital Investment Program Plan (CIP) Sewer Fund Proposed Budget by Program. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/ESC%20SEWER%20CIP%20Updates%202023-2029%20Budget%20by%20Program.pdf.
- Bellevue Utilities Department. 2023a. "Bellevue Water System & Leak Management". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/water/bellevue-water-system-leak>.
- Bellevue Utilities Department. 2023b. "Sewer Capital Investment Projects". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/capital-projects/sewer-capital-investment-projects>.

- Bellevue Utilities Department. 2023c. "Recycle Right". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/solid-waste/recycle-right>.
- Bellevue Utilities Department. 2023d. "Wastewater". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/wastewater>.
- Bellevue Utilities Department. 2023e. "Smart Water Meters FAQ". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/water/meter-access-guidelines/smart-meter-installation>.
- Bellevue Utilities Department. 2023f. "Water". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/water>.
- Bellevue Utilities Department. 2023g. "Water Capital Investment Projects". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/capital-projects/water-capital-investment-projects>.
- Bellevue Utilities Department. 2023h. "Water Source". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/manage-your-utility-services/water/water-source>.
- Bellevue Utilities Department. 2023i. "Watershed Management Plan". Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/capital-projects/watershed-management>.
- City of Bellevue. 2014. Septic Sites Map. Produced March 12, 2014.
- City of Bellevue. 2015. Neighborhood Fire Stations Map. Produced October 13, 2015.
- City of Bellevue. 2016a. Parks & Open Space System Map. Produced September 29, 2016.
- City of Bellevue. 2016b. The City of Bellevue Storm and Surface Water System Plan. Accessed March 2023. <https://bellevuewa.gov/city-government/departments/utilities/utilities-projects-plans-standards/utilities-plans-and-reports/storm-and-surface-water-system-plan>.
- Issaquah School District. 2022. 2022 Capital Facilities Plan. Accessed March 2023. <https://resources.finalsite.net/images/v1654891626/issaquah/vkxwzlizyzde8uelyizv/FINALISD2022CapitalFacilitiesPlan-BoardApproved.pdf>.

- King County. 2017. Amended and Restated Solid Waste Interlocal Agreement. Accessed March 2023.
<https://kingcounty.gov/~media/depts/dnrp/solid-waste/about/documents/ILA-Bellevue-SWD-2017.ashx?la=en>.
- Lake Washington School District. 2022. 2020-21 Annual Report. Accessed March 2023. <https://www.lwsd.org/about-us/annual-report/2020-21-annual-report>.
- Lake Washington School District. 2023. October 1, 2022, Enrollment Report. Accessed March 2023. <https://www.lwsd.org/about-us/enrollment-report>.
- PSE (Puget Sound Energy). 2021. 2021 Service Quality Report. Accessed March 2023.
https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/2021%20Service%20Quality%20Report%20Card.pdf.
- PSE (Puget Sound Energy). 2022. Memo to Thara Johnson Re: 2021 Electric Service Reliability Report. Accessed March 2023.
https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Bellevue%20Reliability%20Report%20%282021%29.pdf.
- PSE (Puget Sound Energy). 2023a. "Pay Station Locations". Accessed March 2023. <https://www.pse.com/en/pay-stations-map>.
- PSE (Puget Sound Energy). 2023b. Pole inspection and maintenance program. Accessed March 2023. <https://www.pse.com/en/pages/pse-projects/pole-inspection-and-maintenance-program>.
- Quanta Technology. 2013. Eastside Needs Assessment Report Transmission System King County. Accessed March 2023 at <https://energizeeastside.com/documents>.
- Quanta Technology. 2015. Supplemental Eastside Needs Assessment Report. Accessed March 2023 at <https://energizeeastside.com/documents>.
- Renton School District. 2023a. Community. Accessed March 2023. <https://www.rentonschools.us/our-district/community>.
- Renton School District. 2023b. District Demographic Reports. Accessed March 2023. <https://www.rentonschools.us/learning-and-teaching/student-information-services/district-demographic-reports>.

Chapter 11, Transportation

CAPCOA (California Air Pollution Control Officers Association). 2021. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity Designed for Local Governments, Communities, and Project Developers. Final Draft, December 2021.

https://www.caleemod.com/documents/handbook/full_handbook.pdf.

City of Bellevue. 2009. Pedestrian and Bicycle Transportation Plan. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/ped-bike-plan-2009.pdf.

City of Bellevue. 2013. Downtown Transportation Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/DTPFINAL2015.pdf.

City of Bellevue. 2014. Bellevue Transit Master Plan. Accessed March 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/TMP-Bellevue-Transit-Master-Plan-2014.pdf.

City of Bellevue. 2015a. Bellevue Transportation Demand Management Plan 2015-2023. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/transportation-demand-management-plan01152016.pdf.

City of Bellevue. 2015b. Pedestrian & Bicycle Implementation Initiative Program Principles. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/PBII-Program-Principles-2015.pdf.

City of Bellevue. 2018. Smart Mobility Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/smart-mobility-plan-2018.pdf.

City of Bellevue. 2020a. Economic Development Plan. Accessed March 2023. Prepared by City of Bellevue, Bellevue, WA. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Economic%20Development%20Plan%20%28Full%20File%2C%20Adopted%2011-2-2020%29.pdf.

City of Bellevue. 2020b. Environmental Stewardship Plan 2021-2025. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Bellevue%20Environmental%20Stewardship%20Plan_Adopted.pdf.

City of Bellevue. 2020c. Vision Zero Strategic Plan. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/vision-zero-strategic-plan-120120.pdf.

- City of Bellevue. 2022a. Mobility Implementation Plan (MIP). Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Bellevue_MIP_Vol1%262_8.1.22.pdf.
- City of Bellevue. 2022b. 2022-2033 Transportation Facilities Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/City%20of%20Bellevue%202022-2033%20Transportation%20Facilities%20Plan_0.pdf.
- City of Bellevue. 2023a. Choose Your Way Bellevue. Accessed April 2023. <https://chooseyourwaybellevue.org/>.
- City of Bellevue. 2023b. Curb Management Plan. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/Bellevue_CMP.pdf.
- City of Bellevue. 2023c. MIP Concurrency Implementation Guide. September 2022. https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Multimodal_Concurrency_Guide.pdf.
- City of Bellevue and City of Seattle. 2023. A Strategic Vision for Automated Vehicles. Accessed April 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/FR1_Bellevue_Seattle_AVStrategicPlan_Feb23.pdf.
- City of Bellevue Transportation Department. 2021. South Downtown I-405 Access Study Report. Accessed February 2023. https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/South%20Downtown%20Access%20Study%20Final%20report%20July2021.pdf.
- King County. 2021. King County Urban Growth Capacity Report. Accessed March 2023. <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.
- State of Florida Department of Transportation, Systems Implementation Office. 2020. Quality/Level of Service Handbook.
- WSDOT (Washington State Department of Transportation). 2002. I-405 Corridor Program Final Recommendation Report. Accessed April 2023. <https://wsdot.wa.gov/sites/default/files/2021-11/I405RecommendationReport2002.pdf>.
- WSDOT (Washington State Department of Transportation). 2022. Accessed February 2023. Design Manual. <https://www.wsdot.wa.gov/publications/manuals/fulltext/M22-01/design.pdf>.

- WSDOT (Washington State Department of Transportation). 2023. Traffic count data from Traffic Count Database System. Accessed December 2022. <https://wsdot.public.ms2soft.com/tcds/tsearch.asp?loc=Wsdot&mod=TCDS>.
- WSDOT (Washington State Department of Transportation). 2023. I-405/SR 167 Corridor Program. Accessed March 2023. <https://wsdot.wa.gov/construction-planning/major-projects/i-405sr-167-corridor-program>.
- WTSC (Washington Traffic Safety Commission). 2019. Washington State Strategic Highway Safety Plan: Target Zero 2019. Accessed March 2023. http://targetzero.com/wp-content/uploads/2020/03/TargetZero2019_Lo-Res.pdf.

INTENTIONALLY BLANK

CHAPTER 15 Corrections and Clarifications

Chapter 15 provides information to the public about corrections or clarifications made since the publication of the DEIS. Some of the revisions are provided with a narrative explanation and some are provided through underline/~~strikethrough~~ text. The chapter location of each correction or clarification is provided so the reader will be able to locate the original narrative from the DEIS. Some of the earlier chapters in this FEIS include additional information that is not a correction or clarification and is not included in this chapter.

15.1 Chapter 3, Land Use Patterns and Urban Form

Page 3-54, second paragraph:

... Areas zoned for low-density residential (R-1 through R-7.5) would have capacity for between 7~~8~~ and 15 percent of future housing growth under all alternatives.

15.2 Chapter 4, Plans and Policies

Page 4-16: Activity units numbers for Crossroads are corrected as follows:

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

Center	Size (Acres)	Activity Units per Acre				
		Existing (2021)	No Action	Alt 1	Alt 2	Alt 3
BelRed	426 ✓	48 ✓	104 ✓	141 ✓	153 ✓	190 ✓
Eastgate	173 ✓	48 ✓	46 ✓	50 ✓	53 ✓	53 ✓
Factoria	212 ✓	55 ✓	56 ✓	80 ✓	81 ✓	120 ✓
Wilburton-East Main	362 ✓	39 ✓	79 ✓	249 ✓	262 ✓	281 ✓
Crossroads	427 ✓	34 ✓	47 <u>55</u> ✓	59 <u>68</u> ✓	65 <u>75</u> ✓	68 <u>78</u> ✓

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

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

✓ Meets criteria.

✗ Does not meet criteria.

15.3 Chapter 5, Population and Employment

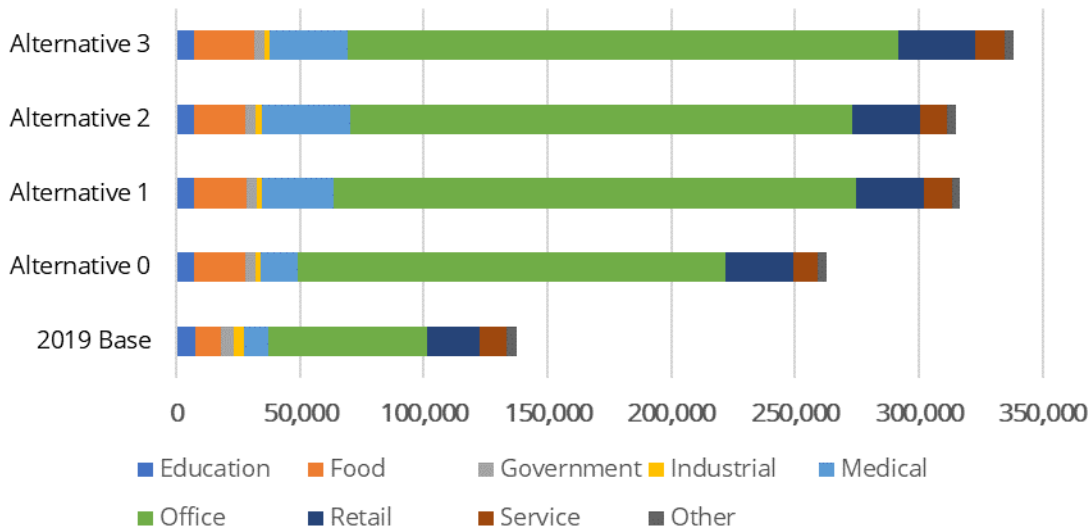
Page 5-13: Corrections to percentages as follows in the following paragraph:

All alternatives increase the role of Mixed Use Centers as key areas of employment, with between ~~76 and 79~~82 and 84 percent of total job capacity (compared to ~~62-69~~ percent of existing jobs). The share of job capacity in Neighborhood Centers also remains fairly constant, at ~~3 to 4~~ percent across all alternatives (compared to ~~4-6~~ percent of existing jobs).

Page 5-14: Correction to the following:

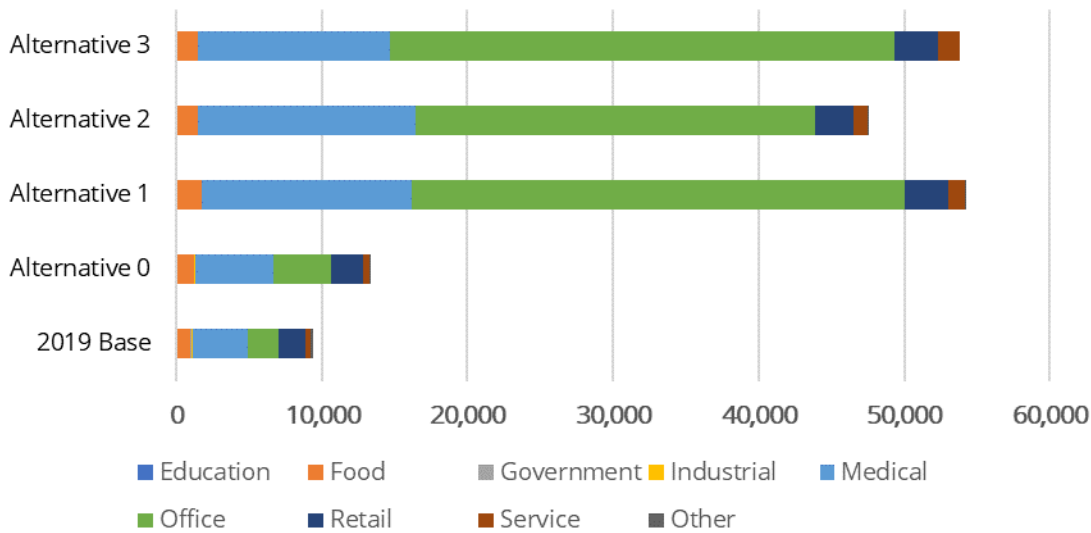
Under the No Action Alternative, the job capacity citywide includes 66 percent Office, ~~11-10~~ percent Retail, 8 percent Food, 4 percent Services, 3 percent Education, 1 percent Government, 1 percent Industrial, ~~5-6~~ percent Medical, and 1 percent Other.

Pages 5-14 and 5-15: Update to Figure 5-3 and Figure 5-4 (Alternative 0 only) as follows:



SOURCE: City of Bellevue 2023

FIGURE 5-3 Total Job Capacity (Citywide)



SOURCE: City of Bellevue 2023

FIGURE 5-4 Total Jobs (Wilburton Study Area)

Page 5-15: Correction to the following:

In the Wilburton study area, capacity for jobs under the No Action Alternative is above the 2019 conditions: the Office sector has 23 percent of current jobs but ~~27~~30 percent of job capacity, and the Medical sector has 41 percent of current jobs but ~~43~~40 percent of capacity. The Services, Education, Retail, and Government sectors capacity under the No Action Alternative is slightly smaller than the share of jobs under current conditions, and the Food sector capacity matches the existing share of jobs at 9 percent.

Pages 5-19 and 5-20: Correction to the following:

... Office jobs make up the biggest share of job capacity (66 percent). Food sector jobs have an 8 percent share of job capacity, which is almost double the current number of food jobs. Medical (6 percent share) and Retail (~~44~~10 percent share) have capacity for job numbers to grow to some extent, while Government (1 percent share), Industrial (1 percent share), and Services (4 percent share) job numbers could decrease. Again, this job capacity is based on current capacity under the current Comprehensive Plan.

Page 5-19: Revised calculations for proximity to RMPs and proximity to traffic in Alternatives 1–3, Table 5-5:

TABLE 5-5 Traffic and Contamination Proximity and Total Housing Unit Capacity

	Alt 0	Alt 1	Alt 2	Alt 3
Unit capacity in areas over 80th percentile for proximity to Superfund sites	17,968	19,264	21,349	24,336
Unit capacity in areas over 80th percentile areas for proximity to RMPs	20,460	33,719 33,449	39,922 39,652	48,055 47,785
Unit capacity in areas over 80th percentile areas for proximity to hazardous waste	42,417	45,531	49,163	53,262
Unit capacity in areas over 80th percentile areas for proximity to traffic	51,098	63,985 63,715	72,976 72,706	79,278 79,008
Unit capacity within 500 feet of highways	3,874	5,418	6,430	7,855

SOURCES: EPA EJScreen; City of Bellevue 2023; BERK 2023

Page 5-26: Correction to Table 5-6, “No Action Alternative” column, “Job Sector Mix” row:

Citywide: Mostly Office (66%), Lower Share of Medical (~~56~~%), Highest Share of Retail (~~44~~10%)

Wilburton Study Area: Medical sector is largest (~~43~~40%), Office ~~27~~30%, Retail ~~17~~16%

15.4 Chapter 8, Air Quality

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. The revised transportation modeling information required additional analysis for air quality calculations.

15.5 Chapter 9, Noise

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. The revised transportation modeling information required additional analysis for air quality calculations.

15.6 Chapter 10, Public Services and Utilities

Chapter 10, *Public Services and Utilities*, was revised to directly acknowledge Puget Sound Energy (PSE) as a non-city-managed utility and reference PSE’s Integrated Resource Plan (IRP).

15.7 Chapter 11, Transportation

The FEIS includes revised transportation impacts for the No Action Alternative and the Action Alternatives to account for updates and revisions to the land use allocations modeled in the DEIS in addition to the estimated impact under the Preferred Alternative.

Based on the updated modeling 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.

The wrong image was included in DEIS Figure 11-4. The correct image is now in the FEIS.

15.8 Chapter 14, References

References have been updated as appropriate by incorporating the references used for the FEIS into the list of references used for the DEIS. The reader now has a combined list of references.

15.9 Appendices

15.9.1 DEIS Appendix B, Land Use Patterns and Urban Form

On page B-5, 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.” This text was revised to include 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.”

15.9.2 DEIS Appendix C, Traffic Data

DEIS Appendix C, *Traffic Data*, has been updated to account for updated information since the DEIS was issued. The alternatives assume a set of new transportation investments as adopted in the 2022–2033 Transportation Facilities Plan (TFP). The full TFP project list is included in FEIS Appendix C, *Traffic Data Revised*.

15.9.3 DEIS Appendix E, Plants and Animals Memorandum

A commenter noted the following in his DEIS comment: “Also, one correction is DEIS states Phantom Lake has a maximum depth of 45’. However the City commissioned 1986 Kramer Chin & Mayo, Phantom-Larsen Lake Restoration Plan Study indicates 54ft

maximum depth*. (See attached Map from KCM Study; 258 NGVD-204 NGVD= 54ft. *BTW 258 NGVD= modern NAVD 261.6, which would be a peak flood level above Phantom Lake's Ordinary high Water Mark ~260.7, so I would argue a depth of 53' based on standard OHWM methodology; lake's gauges have been proven faulty and in error, indicating heights never reached since I've lived here.)"

The city would like to clarify that it is true that the 1986 Kramer Chin & Mayo report provided a maximum depth of 54 feet. That report was issued almost 40 years ago. More recently, the maximum depth has been reported anywhere from 45 to 47 feet. The more recent global positioning system (GPS) information was provided in DEIS Appendix E, *Plants and Animals Memorandum*. The depth of the lake does not change the conclusions in Appendix E, and no change in the DEIS text has been made.

15.9.4 FEIS Appendix K, Transportation Preferred Alternative

Appendix K, *Transportation Preferred Alternative*, has been added to the FEIS to provide a supplemental transportation analysis for a 2044 land use scenario for the Preferred Alternative that is based on the growth forecast for Bellevue. Chapter 11, *Transportation*, analyzes growth to "build-out" capacity, meaning that developable or redevelopable parcels in the city would be developed or redeveloped to achieve the development potential allowed under the land use designation. Because it is not expected that this level of growth would all occur by 2044, Appendix K provides an analysis based on the 2044 growth forecast.

INTENTIONALLY BLANK