



2026-2030

Sustainable Bellevue Plan Update

**Phase III Engagement Report:
Draft Plan Public Comments**



Public Comment on Draft Plan

Introduction

Phase III of outreach involved sharing the draft Sustainable Bellevue Plan and providing opportunities for community members and stakeholders to provide feedback.

The draft plan was available for public review from August 14 to September 8. During this period, the Environmental Stewardship team received feedback from stakeholders and members of the public via email and through the Engaging Bellevue guestbook, which are included in the Appendix to this report.

In addition to promotion through city channels, the draft plan was shared with local sustainability leaders and community-based organizations engaged in Phases I and II. This provided stakeholders with an opportunity to review how their input was incorporated.

In total, the draft received 47 points of contact. While this was fewer than in Phases I and II, the lower number was expected, as this phase requested granular feedback on draft actions and targeted individuals and groups already engaged in earlier stages of the process. Still, the feedback received offered valuable insights into the plan's format and strategies, which informed revisions to the final version.

To view all comments compiled from the Engaging Bellevue guestbook and emails to city staff, see the Appendix. Note that to avoid duplication, responses submitted via multiple channels have been included only once, in the email section.

Comment Themes – General

Stronger Climate Action

Many commenters wanted to see Bellevue commit to more ambitious and aggressive policies and programs to meet the City's climate goals. Of these, several commenters referenced People for Climate Action's 12 Critical City Climate Actions,



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recommending that the city use researched policy tools to jumpstart bold reductions in greenhouse gas emissions.

Accountability

Similar to questions on Bellevue's role in addressing emissions and sustainability, a theme in public comment involved showing greater accountability around progress and spending.

Role of Local Government

Amongst commenters who question if and how Bellevue should be taking action on climate, a common theme of public comment involves whether it is the role of local or state government to address climate change, given the existing state climate policy framework.

Narrative Clarity

Many community members expressed a desire for more clarity and explanation in the narrative of the Sustainable Bellevue Plan.

Comment Themes – Policy

Land Use

Several commenters believed that the role of land use in reaching climate goals, particularly around mobility, required greater attention within the draft plan. These respondents expressed a desire for land use that accommodates diverse mobility options, including biking and pedestrian infrastructure. Commenters emphasized the need to make alternatives to driving safer and more viable for residents and commuters, and cited transit-oriented development, changes to parking minimums, and affordable housing as potential strategies to reduce vehicle miles travelled.



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Resilience

Many respondents expressed concern about climate impacts, including extreme heat, storms, and wildfires. These respondents emphasized the importance of a healthy and robust tree canopy, resilience hubs, and backup energy during power outages in mitigating impacts.



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#	Comment
1	In order for Bellevue to meet their goals, Puget Sound Energy needs to actually continue to make steady "glidepath" progress on their clean renewable solar and wind energy -- which I do not believe they are doing. Instead they "make a plan to make a plan" rather than actually building new wind and solar. Please get busy making sure Puget actually makes real linear progress towards their 2045 State Clean Energy Requirements.
2	I love that my city is doing this. On board. Have solar panels, support green energy, recycle, compost, 1 car family...
3	I see that one of the goals is to have 100% electric vehicles. What happens when the electric grid is down? What do we do when there's a third house fire, and the electric firetrucks can handle only two without taking time out for charging?
4	It is technically impossible to reach a carbon neutral position by 2050 for a couple of reasons. The status quo works just fine. It is economically unjustifiable to change the status quo. Wind and solar cannot compete.
5	What partnerships and collaboration's are being involved in developing a stakeholder analysis with local , national and global academia including @CENDEP @UNITAR to achieve best practice models within urban settings that are at risk of geological impact due to climate change. Current modeling from Asian-Pacific Rim cities have been documented and FEMA's coastal hazard awareness modules include modeling for climate change and rising sea levels in urban areas with specific planning requirements for communities at identified risk to mitigate impact to life and property. COB has an obligation under human rights law to provide safe risk analysis for future generations. We have many current technological advances which could be implemented at city level to achieve a Carbon Neutral city by 2050 and we quietly wonder if it acceptable not to lead by example on a global stage, to achieve sustainable development and climate change action goals. Youth council members have articulated an interest in being included in this stakeholder analysis as their is a risk of food dessert's and already a lack of affordable safe housing within the City of Bellevue.Creative ideas and documents exist from children and young people.How will the department include these documents as the project develops?
6	To address climate issues in terms of transportation and land use, we need to encourage and incentivize residents to utilize sustainable transportation systems, such as light rail, bussing, or walking and cycling.



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This means building and maintaining our current transportation infrastructure and building new ped/bike/transit infrastructure such as removing general travel lanes for bicycle and transit infrastructure, protected bike lanes, protected intersections, mid-block crossings, curb extensions and pedestrian refuge islands, BAT lanes, bus queue jumping, etc.

Nobody will take transit/bike/walk if it isn't comfortable.

Bellevue has good N-W biking corridors (but we need more overlap/provide direct connections to places people want to go). 108th Ave is great, but it's one N-S connection, when we have other great streets like 112th, 110th, etc. that can be connections.

We need better E-W connectors. Bike Bellevue wanted to implement a E-W connection on Bel-Red but that was killed. NE 20th was a great option too, but was also killed with Bike Bellevue.

Painted bike lanes is not bicycle infrastructure. Sharrows alone is not bicycle infrastructure. Invest in real bicycle infrastructure like protected intersections, protected bike lanes, dedicated bike signals, etc.

There is a project on NE 8th Street from 156th to about 164th to add bike lanes along the corridor. But going west on 156th at NE 8th, the bike lanes will drop you end and cyclists will have to brave through NE 8th going west. This is not comfortable, we need a real bike network.

Look to Redmond for bike infrastructure. They have a great protected intersection near the Overlake Village station, and the two way cycle track near the Microsoft campus is great.

Pedestrian infrastructure needs to be improved. Many curb ramps are not per ADA standards. Curb radii is wide to allow cars to make faster turns, which is dangerous for pedestrians. Many intersections do not have high-visibility crosswalk markings for pedestrian safety. Pedestrian level street lighting would also be appreciated for safety.

Sidewalks needs to be improved. Greater widths to prevent conflict would be great, especially along Bellevue Way. Maintaining existing sidewalks should be a priority. Mid-block crossings are needed in a lot of areas. More complete streets projects around Bellevue would make walking a viable way of commuting for many residents.

Queue Jumping and BAT lanes will improve reliability for bus schedules and encourage more riders to take transit.

BRT with level boarding, off bus payment, comfortable shelters and ample lighting will also be great for ridership. Working with KCM and ST on the K Line and Stride is a great first step.

We spend millions repaving roads for cars, but spend nothing in comparison for



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	pedestrian/bike/bus infrastructure. We also need more housing density. The more density we have, the less people will drive to job centers and third places. This means updating the comprehensive plan and land use code to reflect higher density in growth areas such as downtown, Wilburton, crossroads, Factoria, etc. We need to encourage additional ideas such as neighborhood shops to add character to the city and add third places to the city. Allowing multiple units on one lot and ADUs/DADUs like Seattle would address density. This would work towards a more sustainable future. Having a combination of better transportation infrastructure and denser housing will greatly reduce carbon emissions and work towards a more sustainable and equitable Bellevue.
7	I would like to see more guidelines and possible restrictions on single use plastics in Bellevue-- for example, take out containers from restaurants or plastic wrapping. I understand this can place a burden on local restaurants and stores, so it would be important to offer financial resources to business owners if they are required to make changes. Additionally, it would be great to work with King County's textile recycling program and promote other donation locations within Bellevue. A page on the City's website could work well. Supporting community resilience hubs will be increasingly important as wildfire and intense heat becomes worse. Education on risks of smoke and heat is a great step.
8	I'd like to comment on action M.3.2, "Complete study assessing VMT reductions from different transportation investments to better incorporate climate goals into transportation planning" It seems like the real intent here is to "incorporate climate goals into transportation planning." That should be the action. Every transportation proposal should come with an evaluation of its climate impact. Learning how to do that accurately is implied. The draft says it will take 3-4 years to do this VMT study. Does that mean we won't be incorporating our climate goals into our process for evaluating transportation projects for another 3-4 years?! That's ridiculous! Many of our transportation projects involve adding turn lanes and widening roads. These projects are *designed* and *intended* to increase vehicle travel. The MIP talks explicitly about increasing "vehicular capacity" at intersections. If we spent millions of dollars to widen a road, and we didn't see more vehicles using that road, then why did we even widen it? We don't need a 3-4 year study to determine whether or not these projects will have their *intended* effect.



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	These projects to widen roads involve literally spending millions of dollars to ensure we fail to meet our VMT reduction goals. We need an action to look at these projects through a climate lens *today*, not 3-4 years from now, after we complete some study to confirm the obvious.
9	I appreciate the City's efforts to advance sustainability through the 2026–2030 Sustainable Bellevue Plan. However, the plan underemphasizes one of the most important levers for reducing emissions and improving quality of life: land use reform. Bellevue cannot achieve its climate and livability goals without reshaping how people move, live, and work. I encourage the City to strengthen this plan with the following priorities: Colocate jobs and housing Bellevue's economy continues to attract employers, but many workers are priced out of nearby housing. This imbalance drives long commutes, traffic congestion, and higher emissions. The plan should include explicit policies to align job centers with new housing, through zoning reform, mixed-use density near transit, and reduced parking requirements. Improve pedestrian safety and connectivity Sustainability depends on safe and convenient walking routes. Current superblock patterns and wide arterials undermine walkability. The plan should commit to specific targets for reducing pedestrian injuries and deaths, and invest in continuous, accessible walking networks that connect neighborhoods to schools, transit, and services. Reform parking expectations Today, the default assumption is that drivers must park directly at their destination. This creates sprawl, congestion, and inefficient land use. Bellevue should move toward centralized/shared parking facilities where people can park once and walk or use transit to complete short trips. Removing policies that mandate on-site parking at each destination will make land use more efficient, reduce traffic, and encourage healthier travel patterns. Strengthen the street grid system Bellevue's superblock layout limits connectivity and forces most trips onto a few congested arterials. To create a more resilient and efficient transportation network, the City should invest in adding more local connections—new streets, mid-block passages, and pedestrian/bike links—while selectively removing or repurposing road segments that no longer serve community needs. Expanding the grid will reduce pressure on major roads, improve traffic flow, and make walking, biking, and transit more practical options.



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	Without bold land use reform—including changes to how we zone, park, and connect our city—Bellevue risks falling short of its climate and livability goals. Land use is the foundation that determines transportation choices, community health, and ultimately the success of Bellevue’s climate targets. I urge the City to include stronger commitments to land use reform in the final plan. Doing so will make Bellevue not only more sustainable, but also safer, healthier, and more livable for all residents.
10	Bellevue is still a city where most people default to using a car for every trip. That needs to change if we want to meet our safety, housing, and climate goals. The only solution to traffic is viable alternatives to driving, not yet more car lanes. We need to invest in more infrastructure for biking, walking, and transit. Things like protected bike lanes, bus signal priority, intersection daylighting, wider sidewalks, mid block crossings, etc are essential. Just as how currently we provide plentiful car infrastructure with wide arterials and freeways and free parking, and thus most people drive to get around, if we provide safe, plentiful bike lanes and transit options, people will then use those to get around. Most people aren’t hard core believers in using a particular transport mode just because they like that mode inherently. Most people just choose the option that meets their desired combination of safety, convenience, speed, and cost. We need to make non-car transport modes more attractive in these ways to get people to switch away from cars, which is the city’s stated goal. We also need to stop subsidizing expensive and harmful personal automobiles via policy. We should stop widening roads and mandating businesses provide free car storage lots and garages. We should stop giving away massive areas of our streets for free car storage. We should replace some street parking with better land uses like protected bike lanes or mini parklets, or make street parking paid. Paired with this, we must reform land use and permitting. We must legalize more home construction by permitting ADUs, townhouses, stacked flats, multiplexes, and apartments in more areas instead of zoning the majority of our city for single family houses only. We should promote mixed use developments so people can get their daily amenities without traveling far. Land use reform and transport reform must go hand in hand. If we improve transit service and biking infrastructure in an area, but don’t legalize more homes in that area, not enough residents will want or need to go to and from that area, so the infrastructure will be underutilized. If we legalize more homes in an area, but do not improve transit and biking infrastructure to that area, everyone will have to drive, and the traffic will be interminable.



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11	B.1.2: Usage of natural gas in new buildings should be prohibited completely, otherwise, how are you going to keep up with conversions? Even for Wilburton, the city didn't take this action, and this means that the city is expected to shoulder the cost of future conversions. This is irresponsible. M.1.2: Great! But please consider that for this program to succeed, proper infrastructure is required. Where is the plan to build that infrastructure? The Transportation Department built only "0.57 miles of other shared use paths and 0.64 miles of new bike infra" last year, according to their own report, which is, presumably, what will be used for e-bikes and scooters, and even that is mostly paint rather than safe and protected facilities. In addition, infrastructure is often built not where it is most needed, for example, there is still a huge connectivity gap between East and West, Lake Hills/Crossroads and Downtown. M.2 and M.3: I find it incredible and sad that you have four specific strategies for EV charging (that would benefit only those who can afford those in the first place) and just two very vague strategies for accessibility and connectivity of transit which would benefit literally everyone. Whoever wrote those two M.3 strategies should be ashamed of doing such shoddy work. M.2.2: From the environmental point of view, bus electrification is less important than making buses attractive enough for more people to switch to using them (or making driving unattractive). I don't see any strategies that would make buses in Bellevue more reliable or frequent. To achieve the former, buses need to be separated from cars, and in Bellevue we have too many lanes on almost any road, so that should be part of your plan. Perhaps then it would make sense to increase frequency. M.3.2: Another study for several more years? Any transportation project the city undertakes should already demonstrate that it will contribute to achieving environmental goals of Bellevue or at least not worsen them! None of them do that now, and in fact, the city has multiple projects in the works that explicitly strive to increase VMT by increasing throughput and, consequently, emissions since electric vehicles are still as expensive as ever (road widening in Downtown, intersection widening, and so on). Even though the concept of induced demand is by now more than 50 years old, we need another study to make sure it exists? M.4.3: please, just adopt the state-required parking mandates that the city will have to do anyway, or even better, do as Bothell, Shoreline, Bremerton, Spokane, and many other cities did recently and remove parking minimums everywhere. If anything, put in very low parking maximums. M.4 in general: Why is there nothing among land use strategies that would reduce VMT? If I have a cafe in my neighborhood and my neighborhood is walkable, I don't have to



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	drive. If I have a farm stand on my block, I can walk to buy fresh groceries daily instead of driving to buy tasteless tomatoes from a big-box store. Zoning is as important for achieving climate goals as anything else, and yet it is completely absent from your plan. N.1.2: I am glad that you acknowledge that tree canopy is not distributed equally, and that most of it is in single-family-house neighborhoods where very few people can benefit from the shade since the minority of residents live there and certainly nobody works there by definition. But voluntary standards (even for the city itself?) are not going to cut it. There should be a dedicated effort that focuses on trees in common areas: along roads (it makes a huge difference if the road is not very wide, so consider also narrowing roads), on parking lots, especially given that parking lots, both belonging to the city and on private properties, are obscenely huge, and in parks. Plenty of our parks are just glorified lawns that do not provide shade, require plenty of watering and gas-powered mowing/blowing. The city should set an example and plant trees at least on its own property. N.2.2: Just ban them already! At least don't use them yourselves! Even Mercer Island bought an electric leaf blower for their parks. F.1.1 and F.1.3: This should have been done by now. I have already given an example of poor coordination with the Transportation Department, but the Parks Department doesn't seem to care much for sustainability either. Look at the Phase 2 plan for Meydenbauer Park which adds 50% more parking stalls (and generates VMT along with it) and spends tens and tens of pages, and presumably many dollars paid out to consultants, to analyze the level of service for cars to make sure VMT does not go down too much. No pages are dedicated to sustainable park access at all. They could make the park more accessible to everyone by providing a shuttle from the transit center and they could improve micromobility infrastructure to access the park, but they didn't and you didn't provide your input either. In short, I am glad that Bellevue is not giving up on sustainability but according to your own survey, the residents want bold climate actions, and this is anything but bold.
12	The draft states that “35%” (in one place) or “more than 40%” (a bit later) emissions are from cars. Reducing those emissions is a major task to solve, and I expect that the transportation department will be named as instrumental here, along with changes to building codes, zoning requirements, and parking minimums. To make alternatives to driving appealing, a lot of changes are necessary. As a bonus, the same changes can be expected to improve the situation with flooding, provide free space to extend the green canopy, and increase safety for everyone. However, after reading the draft, I cannot shake the feeling that the master plan to “solve” the task is by eventual “100% transition to electric vehicles”. There are many details on the installation of more electric chargers, but when the authors get to real changes, it reads “M.4.3 Assess feasible pathways to further reduce parking requirements in transit-



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	rich areas” - study (!!!), 5+ years (!!!). Or this one - “M.3.1 Explore new funding sources ... [for] bicycle and pedestrian infrastructure, transit speed and reliability projects, transit access projects.” Study again, for 5+ years. This sounds like a bad joke. Just look north - Bothell recently just removed parking minimums and allowed corner stores/cafes. Guess how it will affect housing density and VMT? Or maybe look west - Seattle reduced speeds to 20 mph on residential and to 25 mph on many arterials 4 years ago. Bellevue is just starting a pilot (!!!) program on a couple of streets after killing “Bike Bellevue” and being silent about “Vision Zero”. Redmond has had Lime bikes and scooters for a while and is actively extending safe pedestrian/scooter/bike infrastructure. Bellevue’s plan is to spend the next 3-4 years to “maybe get Lime too”. Bellevue is doing everything to encourage people to drive more by widening roads and intersections, prioritizing vehicular traffic over all other forms of mobility, enforcing mandatory parking in all construction, setting high speed limits, and refusing to enforce them or implement any traffic calming measures. Putting in an unregulated pedestrian crossing (aka painting the road) takes years to plan and review... No wonder why people prefer to drive, and VMT isn’t going down. And looking at this draft doesn’t inspire any optimism for seeing any real changes in many years to come...
13	Ms. Ewing and team, Thank you for the opportunity to engage with the City on the draft 2026-2030 Sustainable Bellevue Plan. UMC is a design-build mechanical contractor for commercial-scale buildings, a union shop based in Western Washington State since 1920. Like you, we see sustainable cities as an engine of jobs and opportunity. Given our construction mindset, we’ll weigh in on some particular bright points in the draft outline so far. First, it’s excellent to see mention of thermal energy systems in the draft strategies, especially with the City’s “success metric” listed as “permits issued.” That said, the timeline of “5+ years” doesn’t need to be so long – thermal systems do take time, but a permitted project is possible within 30 months if the City engages deeply. Another success metric on thermal energy systems could be the planning necessary for the Grand Connection to serve as a thermal connection as well – a Wilburton-area network would be ripe for connecting downtown. This has certainly already been discussed; I imagine the line-item may appear in next drafts soon. Thank you for your hard work so far; we look forward to continuing to partner for a thriving Bellevue. Onward! Together. Bonnie & UMC



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14	So proud of Bellevue for trying to do our part to preserve our little piece of the planet
15	The plan does a good job of informing readers about a lot of climate related subjects, and explaining the city's stance and strategy. It also provides a lot of good resources to help individuals implement certain strategies in their businesses and homes. However, there are some things I feel the city could also add to their strategy in a couple of respects that would accelerate the city's climate goals more. 1. Prioritize denser zoning. The city's decision to roll back a lot of their more ambitious plans for increased density surrounding transit hubs was extremely disappointing, and makes me question the city's true commitment to this climate action plan. The city recognizes the need for more transit oriented development, and denser living in order to reduce carbon emissions. And yet, the city seems to drag it's feet at every opportunity when it comes to actually implementing these in policy. If the city truly wants to become a leading example in the fight against climate change, it should be prepared to fully commit to ambitious transit oriented and walkable infrastructure. Instead, we see the city doing the opposite, actively stopping themselves from committing to these principles. 2. One of the most efficient building standards is the Passive House Standard. It can reduce a residential building's energy usage to 10% of what it used previously, and makes a building so efficient it can be heated by the power equivalent of a hair dryer. The cost of building a new Passive House is only slightly more than building a non-Passive House, but already built buildings can be converted to the Passive House standard. I think the City of Bellevue should invest significantly in requiring new single family units to be built to this standard, incentivizing buildings to be built to this standard, and retrofitting already built houses to this standard. There are multiple Passive House standards, so I would recommend using the international standard. 3. The city needs to do a better job of communicating to residents which items can be recycled and which cannot. Almost everyone I know struggles with this. The specific type of plastics that can be recycled in the city, as well as the vital information that people need to wash items before placing them in the recycling, must be communicated on a mass scale to residents, via advertisements online and on TV, school education, etc. 4. The city could potentially help accelerate EV adoption by passing legislation requiring all gas stations within the city to provide EV charging in some form. In addition, the city could also accelerate renewable energy adoption by requiring gas stations within the city to cover their roofs with solar panels. 5. The city could accelerate it's adoption of renewable energy by passing laws similar to what were passed in France regarding parking lots of a certain size being required to cover themselves with solar panels (https://www.theguardian.com/world/2022/nov/09/france-to-require-all-large-car-parks-to-be-covered-by-solar-panels) 6. There are some pieces of legislation the city could pass to accelerate decarbonizing car transportation. I think the city requiring new cars sold within the city to be HEV, PHEV, or EV vehicles is feasible and would have significant results on carbon emissions immediately, while we wait for mass EV adoption to be rolled out across the city on the

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	long term. 7. The city's supposed commitment to expanding cycling infrastructure is very promising. What I would like to add as suggestions is that a. this expanded bike network is comprehensive and completely interconnected, i.e. a biker should not have to share the road with a car unless it is in a residential neighborhood street, and b. this bike infrastructure is made up of protected lanes with physical barriers rather than just white paint on the road. I would suggest looking at what Seattle has been doing to expand protected bike lanes as an example. Also, the city should significantly expand the usage of two-step bike box turning systems. 8. The city needs to make do on it's promises to commit to increasing transit options for commuters. In the past, the city has stood to delay, impede, and overall resist the Eastlink Light rail Extension, most notably due to the efforts of current councilmember, former mayor, and avid Trump supporter Conrad Lee, as well as the efforts of notable Eastside billionaire Kemper Freeman and the Freeman family as a whole. If the city is serious about increasing transit opportunities within the city rather than simply talking about doing so, it needs to significantly change it's approach. It must remove the barriers that prevented transit in the past and fundamentally change certain city systems so that transit can be built easier. We must prevent single businessmen and controversial councilmembers from impeding the city in it's efforts to maintain these commitments, in a way that ensures everyone's voice is still heard, though not giving significant power over these decisions to individual actors at the expense of others. 9. New Rochelle is a suburb of New York city, and is notable for finding a way to overcome many of the challenges cities face in implementing transit oriented and walkable development, denser living, etc. I think Bellevue should adopt the New Rochelle model to address it's housing affordability crisis, though this same method can serve the city in addressing it's climate commitments as well. More information here: (https://www.wsj.com/real-estate/nyc-new-rochelle-lower-rent-e7695ded?gaa_at=eafs&gaa_n=ASWzDAGg8yMojlhUYymbrsLTaQzY4AFfOdMkbtu9GBL6KM7VEdpWOOPKnhlf&gaa_ts=68aa3a96&gaa_sig=l6kao1ObZmdL0jS Xulgrt4svMnP4pyDYvs0G2O5oTBYAwb6it95ZF0jtJB4eoeIQ2-nNvT9MSe2zQRlcTMRc0A%3D%3D) 10. The biggest barrier for many to decarbonize their personal cars is cost. I think the city should invest in ways to help individuals upgrade their cars for HEV's, PHEV's, and EV's, potentially by subsidizing the cost for them via programs, providing increased incentives (ex. cheaper parking within the city, lower taxes, etc.), and other methods of helping owners obtain reduced carbon cars. Overall, I think the current plan is very ambitious and I think the only changes the city should make would be to potentially make it more ambitious. I would've liked to see more specific plans for how the city would try to implement it's goals, though I understand that this is probably not the intended purpose of this general guideline.
16	Happy to see the city taking sustainability seriously. Currently I bike to work everyday and know that I am an outlier. Most people still see biking and taking public transit as lesser. So it's going to be hard to change this attitude. A big part of that is making alternatives to

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	driving more appealing though. Proper bike lanes go a long way to making more people comfortable riding. Biking next to cars is terrifying. I avoid it whenever possible. If you don't see women, children, and elderly people biking you know you don't have a safe location for biking. Only people I see biking are young men like myself. Proper bike infrastructure takes far less money than car infrastructure and has long term health benefits for people. Please budget is properly and seriously just like car infrastructure.
17	The biggest surprise for me is how far below target Bellevue is for reducing emissions of residential buildings. The goal is 69% by 2030 but only 3% has been achieved! If the city is serious about this target, it needs to dedicate a lot of funding to it, right now. Meanwhile, the goal for reducing passenger vehicle emissions is only 22% by 2030. According to the city's data, transportation is actually a bigger source of greenhouse gas emissions than residential energy (though it doesn't say how much is passenger vs freight). The city should be putting just as many resources into reducing transportation emissions as it does residential emissions. For transportation, there is a large emphasis on electric vehicles. In recent years, EV sales have slowed dramatically, so I think it's unreasonable to expect the pace of EV adoption to continue. Perhaps it could be lifted by tax incentives and subsidies, but I think there will still be a large gap. I believe the city should instead focus more on ensuring that people traveling in Bellevue have viable alternatives to driving. That means better bus service, better connections to light rail, better sidewalks, better bike lanes, and less cars on the road. Bellevue has already identified many ways to improve these alternatives, but it has failed to implement many of them, scaling back projects or cancelling them entirely. Reducing car traffic has many benefits beyond reducing greenhouse gas emissions. This would also reduce road fatalities and serious injuries, reduce noise pollution, and allow for re-using public right-of-way for other purposes, making our streets nicer places to be.
18	Overall I appreciate and support the Sustainable Bellevue Plan. Here are some additional goals that I would like to see incorporated into the plan. - Hold Puget Sound Energy to align to this plan for electrification goal and carbon reduction goals. - Work to Puget Sound Energy to incentivize additional solar within the city (both public and private). - Support more bike lanes within the city - Encourage more walkable communities within the city - In regards to natural systems, be explicit about utilizing native plants in parks, and public right of ways. - Continue to expand Bellevue parks via acquisition and preserving public right of ways. - Develop specific plans to enhance streams within Bellevue reestablish salmon runs in Kelsey Creek, Coal Creek, Sunset creek (using recent culvert removal under I90 in Eastgate).



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19	Overall really well done. One suggestion (I may have missed it) but on pages 24-39 there are abbreviations used for Lead Department. I didn't see any kind of glossary that told me what the actual department name is. It may be earlier in document, but by the time you get to page 24 - you've done a lot of reading. It would be great to add a dept list and each ones abbreviation used.
20	Carbon Neutral by 2050 is insane. We will bear tremendous costs. Literally no benefit. We should also not change building codes. Our building codes are already onerous.
21	we're nowhere near achieving our goal of reducing emissions by 50%. saying that we experienced XX% percentage of growth seems like an excuse, but i imagine growth was considered when coming up with the goal. if we're serious about the goal, we should be allowing WFH days for city workers where possible. the focus on ev chargers are great, but i don't think they're in the right places and there aren't enough. i think more money should be given to residences to electrify or move to heat pumps (for retrofitting). businesses should be mandated to retrofit without being subsidized.
22	The plan is optimistic. It acts like Bellevue is an island, unaffected by the dangerous actions taken by the current administration. I also see serious omissions in the plan. We live on earthquake faults. The plan does not include substantive plans for water protection in case of an earthquake. My house cannot effectively use a heat pump as it is a daylight Rambler. Heat pumps make the basement freezing by the time you cool the upper level. If you increase subsidies to 100% I would put electric heat in the basement powered by my current solar system with a battery you provide. You are not dealing with the UNFAIR distribution of density in "lower" income neighborhoods. How about using some parkland at the edges for low and moderate income housing people can BUY with subsidies from the government. How about buying the tech center on a bond issue so those of us forced into density have a green space to go to. Skip building the stupid "promenade. What a waste! Crossroads must be the most overused park in the city. How about a bond issue to buy the tech center ...and if they won't sell...eminent domain! How about a plan to create loans if we want to demolish our house and build a little 4 plex with an elevator! Pay for it with an extra tax on any single family home over 3500 ft! How about a fund to protect homes under 1350 feet from demolition by builders? Tax breaks? How about fees on unoccupied homes. I have one across the street and one next store. How about a tree ordinance like BRIDLE TRAILS for ALL of Bellevue! That is the only shady neighborhood on a sunny day. How about insisting parking lots have BIG trees for shade? Yeah, more work to clear maple leaves in fall, but how grand! How about insisting any large undeveloped space be reserved for low income, teacher and senior housing! (Think about the \$30M parcel just sold by BSD!) How about a plan for our



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	health, given another pandemic is likely? How about mini electric buses like the one in downtown Bellevue for all of us...to get to Crossroads for groceries or to the medical centers near downtown? How about COVERED bus shelters, especially near school routes or near housing for the disabled? Are glass skyscrapers energy efficient? All new corporate buildings must be VERY energy efficient when built. Plan for the recession. We see it coming.
23	While we mention Air and Noise pollution, we also need to address the increasing amount of Light pollution and power wastage done by large commercial buildings in downtown Bellevue and Spring District. Its highly damaging to the resident bird and wildlife who need complete darkness to have a proper sleep cycle and keep this City in a Park, maintain its bio diversity. The rise of the META office buildings and its neighboring towers emit a large amount a light at night. They need to switch them off or have motion sensors to turn them if some one is working late at night.
24	Thank you for all your work on creating this draft plan to keep Bellevue sustainable. While, it reads very well, it lacks well defined and measurable goals. For example, in the community wide emissions wedge analysis, it is not clear what emissions must be addressed through local Bellevue city action. Also, where in the plan does it explain how all this is going to be funded? While some aspects are addressed by PSE and State and Federal (now in jeopardy) funding, the city must take stronger actions to address the emissions from our current housing and building stock. This will take energy, clarity and funding.
25	COB Sustainability Action Items 1) Eliminate (phase out promptly) gas-powered yard equipment in Residential Zoning areas, including but not limited to, leaf blowers, hedge trimmers, edgers, weed whackers, push lawnmowers, chainsaws with bars less than 20-inches. (OK to keep motorized equipment for road and park crews.) California's Bold Move: Say Goodbye to Gas Lawn Mowers in 2024 – The Global Carbon Fund. Gas Leaf Blower Phase-Out City of Ann Arbor Gas-powered yard equipment are a significant contributor to GHG and other harmful emissions such as particulate and noise. (Ref EPA, National Emissions from Lawn and Garden Equipment, Microsoft Word - IEI 2015 Paper_Final_041015) Gas-powered yard equipment are a convenience, not a necessity. They save the operator money, but impose the cost of air pollution and noise pollution on the rest of the public. They are a public nuisance. (Co-benefit: noise reduction) 2) Enforce vehicle noise regulations. Various drivers have modified engine tuning to cause backfire, producing VOC, UHC, CO, particulate emissions and noise. Others have purchased cars that were offered without a muffler meeting the requirements of the WAC, that is cars that were designed specifically to make loud noise. These drivers cruise around in circles, not to any destination or errand, but rather just to draw attention to

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themselves, and to harass and annoy the general public. Once their ability to use their car as a noise maker is taken, this superfluous driving will stop and eliminate the associated GHG and noise emissions. (Add a block on your diagram on page 11 for elimination of detuned cars and superfluous driving) (Co-benefit: noise reduction)

3) Urban trees are a net producer of GHG; not a greenhouse gas absorber. The secondary effects of urban trees dwarf and negate the beneficial effects to GHG. The negative effects include:

- Power used for maintenance; trimming, leaf blowing, detritus pick-up, and transportation,
- Power used for removal; chainsaws, branch grinders, hauling
- Power used for repair of homes and property damaged by falling trees
- Repair of infrastructure damaged caused by falling and uprooted trees, power lines, communication lines, water lines, and gas fuel lines.
- Power used to repair root damage to sidewalks, roads, driveways, foundations, water lines and sewer lines.
- Roof maintenance from leaf and needle deposits, clearing of culverts
- Respiration; decaying trees and leaves return captured carbon dioxide to the atmosphere.
- In northern climates (Bellevue) trees block sunlight and require additional energy for lighting and heating.
- Asthma and allergy treatment from pollen and particulate emissions resulting from leaf blowing and tree maintenance activities
- Harmful psychological effects of the noise associated with tree maintenance and storm damage repair activities.

Urban tree count and size should be held to the minimum needed for aesthetics and shade on hot days.

Questions

- 1) GHG reductions from electrification assume all electric power is renewable, correct? Page 9 "... as the electricity grid transitions to 100% renewable energy"
 - 2) Page 9. If refrigerants are 5%, is there a plan to proactively remove them or do you plan to let them phase out by attrition as appliances fail and are replaced with low GHG refrigerants?
 - 3) What specifically is "Clean Energy Law" noted on the graph on Page 9?
 - 4) Page 11 graph. Is the lawn equipment GHG reduction weighted for VOC and Nox?
 - 5) Page 16, materials and waste, why does the reduction go down from present to 2030?
 - 6) Page 19. "The urban tree canopy provides many benefits for community livability and resilience; neighborhoods with higher tree canopy remain cooler during heatwaves and have better air quality and stormwater absorption compared to neighborhoods with low canopy." Can you document this statement? ... or is this dogma?
 - 7) Page 19: ". Given that Bellevue will also experience more intense and frequent rainfall events," Can you document this statement? Or is this dogma? I have yet to see a rain storm worse than 1987.
 - 8) Page 28. What is meant by thermal energy networks in building design?
- Rhetorical Questions



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- 1) Page 27; solar collectors. This should include opening up of tree canopy to allow sunlight to reach solar collectors.
 - 2) Why no mention of cool roofs?
 - 3) Page 36. N.4.2 low-maintenance lawns and yards; needs more emphasis (co-benefit, noise and particulate reductions)
 - 4) Page 36, N.4.1 Under “resilience” why not have water wells drilled in each neighborhood for emergency water supply?
- Comments
- 1) Section “building climate resilience” , do you not see the contradiction between Page 6; “Increasing tree canopy across urban heat islands in Bellevue can reduce peak summer heat by 2-9°F” and Page 7; “bomb cyclone” to unleash a deadly storm of heavy rainfall and severe winds that resulted in damages across the community including extended power outages, fallen trees, loss of life, and destruction of personal property”? The destruction described was due to falling trees, not the storm itself.
 - 2) Page 6; Do you not see the contradiction between “MERV 13 filters for air infiltration at community facilities that serve high-risk populations can reduce indoor exposure to smoke and other harmful respiratory particles up to 70%” and the air emissions associated with tree maintenance and tree pollen?
 - 3) Section “building climate resilience” , do you not see the contradiction between Page 6; “Increasing tree canopy across urban heat islands in Bellevue can reduce peak summer heat by 2-9°F” and Page 7; “An intense storm hits Bellevue and knocks out power for several days”? The storm did not cause the power outage; the falling trees did.
 - 4) Page 6; the flooded culvert is an engineering miss, not necessarily a symptom of climate change. Sustainability is an imperative for civilization. There is no need to create mythology to justify it.
 - 5) Page 7; the bomb cyclones are so infrequent that they can not be related statistically to climate change. Refer to; Columbus Day 1962: Memories of storm that roared still vivid | The Seattle Times. Sustainability is an imperative for civilization. There is no need to create mythology to justify it.
 - 6) In Bellevue and northern latitudes, the benefits of climate change include; lower heating bills in the winter, less snow removal cost, less ice and snow related accidents and property damage.
 - 7) Page 8 “Air pollution negatively impacts respiratory health and can increase the risk of cardiovascular disease and certain cancers.” Action items above will improve air quality.
 - 8) Page 17, mobility and land use. Add promotion of “work from home”. A corollary to this would be to keep residential noise levels down to make “work from home” comfortable and productive.
 - 9) Page 17, “....land use planning can facilitate connected neighborhoods, quality of life improvements, and access to walkability” Bridle trails needs a connector trail segment under the 136 Ave NE power line between NE 37th St and NE 40 th ST. Can you make that happen?
 - 10) Page 35 N.1.5. same comment as above regarding a connector trail segment.
 - 11) Page 35 N.2.1 “mitigate pollution from electric yard equipment”??? Did you mean “gas”?
 - 12) Too much emphasis urban “heat islands”. A dense urban area has more energy input, more people, more air conditioners, and vehicles. We should expect it to be hotter.



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	Yes; have some trees for aesthetics and shade. No; to trying to make a skyscraper district as cool outdoors as a rural area. 13) Page 5; Too much emphasis on “what people think”. People can be misled. Let science be your guide. 14) Page 6, “reduce peak summer heat by 2-9°F.” “heat” should be replaced by “dry bulb temperature”. “Heat” as a technical term is not measured in Fahrenheit.
26	Hello Environmental Stewardship team. On behalf of the People for Climate Action Bellevue chapter of over 250 members I’m offering the following comments about the draft Sustainable Bellevue Plan. It’s easy to see that the new SBP draft is better than the old 2020 ESP. That said, as drafted, the new SBP doesn’t have the horsepower to put us on track to hit Bellevue’s 2050 greenhouse gas reduction target. Consequently, PCA has recently begun meeting with you and other city officials to strongly recommend that the City’s draft SBP be modified to include all twelve actions which are detailed in PCA’s “Twelve Critical City Climate Actions” report that was issued in late July. We have previously shared that full-page report with you. For reference purposes in this comment, here below is the report’s table of contents listing all twelve critical actions. FIVE ACTIONS FOR EXISTING BUILDINGS 1. Expand the Energy Smart Eastside Program 2. Create a Multifamily Buildings Decarbonization Program 3. Create a Small Commercial Buildings Decarbonization Program 4. Adopt a Large Buildings Electrification Ordinance 5. Adopt a Home Energy Score Posting Ordinance FIVE TRANSPORTATION SECTOR ACTIONS Three Actions to Promote Multi-Modal Travel 6. Promote Public Transit Use 7. Increase Safe Biking and Pedestrian Pathways 8. Promote Employer Programs That Encourage Driving to Work Alternatives Two Actions to Promote EV Charging at Home 9. Expand EV Charging Requirements for new Multifamily Buildings 10. Promote EV Charging in Existing Multifamily Buildings TWO SUPPORTING ACTIONS 11. Establish a Robust and Ongoing Climate Action Public Education Program 12. Establish a Dedicated Climate Action Funding Stream As shown above by the first and second capitalized contents banners, we feel strongly that cities such as Bellevue need to focus attention on reducing greenhouse gas emissions in the transportation sector and in the existing buildings sector. Together, these two sectors account for 78% of Bellevue’s latest (2023) greenhouse gas inventory.



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To visually drive home the point, we have been sharing Bellevue's posted 2023 greenhouse gas emissions pie chart along with important annotations that we have added. Unfortunately, this comment form doesn't allow us to include the annotated chart here.

In discussing that emissions pie chart, we've been pointing out that a 33% slice of the pie is caused by fossil fuels used in generating the electricity on the grid. By 2045 PSE plans to eliminate those emissions and have a clean grid. So, the city need not worry about cutting those emissions.

However, the city does need to focus heavily on actions to cut the 19% slice of the pie caused by the burning of fossil fuels (mostly natural gas) in buildings. Neither PSE, nor current state or federal programs will cut those emissions. Highly impactful actions by the city are needed there. That is why we highly recommend the first five actions in PCA's list of twelve critical climate actions.

Also, the city needs to focus on more impactful actions to rapidly shrink the 26% pie slice that represents emissions from on-road vehicles. Though the State's law banning the sale of new gas fueled cars in 2035 will be a big help, we think Bellevue should accelerate ambitions of people to switch to EVs, and also encourage more use of alternative transport modes like public transit, vanpools, bikes, etc. Actions six through ten in PCA's list of twelve critical actions do just that.

Unfortunately, if a person only takes the time to hastily scan through the city's "Sustainable Bellevue Plan" and look for the twelve actions that are in PCA's list of critical actions, they will find what appear to be several commonalities and, at casual glance, what appear to be matches. However, in all but one instance, that would be an incorrect assumption.

I personally have a different comparative view, based on the following recent experiences:

- I am very familiar with the details in PCA's "Twelve Critical City Climate Actions" report, since I did the final editing and looked over all of the reference links made in it.
- After fair amount of analysis, I have a good idea of the scale needed for an impactful and viable long-term implementation plan for each of those twelve actions.
- I have read the 40-page narrative that the City of Bellevue staff published when they posted their draft plan in mid-August.

While the city's newly drafted plan touches on several of the subjects in PCA's list of twelve actions, Bellevue's draft plan is in most places quite sketchy and largely hesitant in approaching them. When we read the narrative posted with the SBP carefully, we find that many of the city's actions that seem similar to PCA's critical twelve actions are described with a limited scope compared to what PCA advocates for, and those descriptions often use terms such as "study", "consider", and "test pilot". As PCA's 52-page report demonstrates, other cities in the U.S.A. have already implemented the twelve actions that we advocate. Bellevue need not re-invent the wheel. There is neither the time nor the need for more study.



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	In short, the urgent need to quickly launch full scale and decisive greenhouse gas curbing actions is largely missing in the current Sustainable Bellevue Plan draft. Without an emphasis on urgency and a prompt full scale approach, adoption of the city's current draft plan would doom the city to missing the 2050 emissions reduction target. In our analysis, all of the actions on PCA's list of twelve must be promptly launched at full scale during the city's next 2027-28 biennium budget period because most of those actions require at least 20 years to have their full impact. Therefore, they all must be fully underway before the start of 2029. Only a full scale and rapid mobilization of these actions in that next biennium budget time frame can get us where we need to be by 2050. (By the way, we have drafted an implementation plan timeline for Bellevue to get all of the 12 actions underway before early 2029). In conclusion, there is much more detail that could be said about the plan, but space and time to not allow it here. The plan is better than the old 2020 plan, but not sufficient in depth, breadth and urgency to get us to the ultimate 2050 greenhouse gas emissions commitment that the city has made. Without considerable strengthening to the extent that People for Climate Action advocates in its list of twelve critical actions, this plan would doom the city to missing that 2050 emissions target. People for Climate Action leaders remain eager to carry on this discussion further with city officials in hopes of enhancing the SBP so that it comes into alignment with that necessary 2050 emissions goal. Thank you very much for this opportunity to comment. --the People for Climate Action Bellevue leadership team
27	Climate Solutions thanks you for the opportunity to submit comments on the proposed update to the Sustainable Bellevue Plan for 2026-2030. Climate Solutions is a clean energy nonprofit organization working to accelerate solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and Climate Solutions is at the center of the movement as a catalyst and advocate. We are strongly supportive of the Sustainable Bellevue Plan's goals to reach carbon neutrality by 2050 through high-impact strategies that address the needs of the Bellevue community, in particular underserved communities and vulnerable residents who bear the brunt of climate impacts. We offer the following suggestions to the plan: ENERGY & BUILDINGS For residential decarbonization, we applaud the highly successful Energy Smart Eastside program that provides heat pumps to homes, and we support scaling it up as much as possible and securing regular funding to make it sustainable. But to reach the ambitious (but necessary) goal of cutting residential emissions 69% by 2030, Bellevue may need policy levers beyond funding heat pumps and weatherization and supporting market transformation. We would therefore put emphasis on action B.6.2 to assess pathways for



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policies to address existing buildings under 20,000 square feet. One policy option that the City could consider is a home energy score ordinance, which requires that homeowners conduct an energy audit at the point-of-sale to inform potential buyers of the energy profile of the home.

For commercial and multifamily buildings, which as the plan says make up 26% of Bellevue's GHG emissions, we would like to see a similar outcome metric identified for progress on decarbonization by 2030, as has been identified for residential buildings. We are also concerned with the timing of the actions on decarbonizing existing buildings. Bellevue Action B.6.1 discusses only a study to assess the feasibility of policies for decarbonizing large buildings, which is estimated to take two years and only be funded in the 2027-2028 budget cycle.

Given the urgency of the climate crisis, we would like to see a municipal policy to reduce greenhouse gas emissions from large commercial and multifamily buildings, to be developed and passed by 2027 and implemented ideally by 2030. One such policy option is a Building Emissions Performance Standard, where Bellevue could build off the successes and experiences of similar policies in local jurisdictions across the country, including Seattle.

MOBILITY & LAND USE

Climate Solutions' research has shown that both reducing vehicle miles traveled and electrification of vehicles are necessary to cut our transportation emissions. We strongly support increasing transit and mobility options and improving EV charging infrastructure. We would also like more specificity for tracking implementation of strategies for electrifying medium- and heavy-duty vehicles.

Affordable housing is also a climate solution, particularly near transit, as it helps prevent low-income communities from being displaced outside Bellevue, adding to their transportation emissions if they still work or do other activities in Bellevue, as well as protect residents from the impacts of climate change. We suggest adding a metric to track the increase in affordable housing near transit specifically.

Thank you again for the opportunity to comment on this bold and necessary plan. We appreciate the collaboration we've had with the City of Bellevue in the past, and we would love to continue working with you to implement the strategies in this plan to improve livability and sustainability in Bellevue.

Sincerely,

Deepa Sivarajan
Local Policy Manager
Climate Solutions



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28	Stop the madness... there is a total lack of peer reviewed research that supports the destruction of City and increasing pur energy cost for a total scam for intermittent power supply. Also the lack of knowledge of your Planet eco system - We are carbon based life forms, atmosphere has 0.04% nitrogen... plants need CO2 to produce O2. Stop the insanity! Don't make our City go bankrupt- bring back COMMON SENSE.
29	Thank you for writing the Sustainable Bellevue Plan (SBP), doing so shows a recognition of the importance of addressing climate change. Although the SBP touts many goals, the critical elements of goal setting are almost entirely missing. Each goal must be specific, measurable, achievable, relevant and time-bound. Without this, the SBP is just pie in the sky - promises with no details on HOW these goals will be achieved. What we need in the SBP is to be sure we are focusing on effective measures that will actually have a significant impact on reducing GHG emissions. We have to know if we're on the right track and be able to prove it by providing numbers on what we'll do by when so we can determine whether we are making progress. To make any of this achievable, money must be allocated and ongoing so programs have consistency in staff and funding. Here is an example of what each goal should be. SPECIFIC The city will establish a multifamily buildings decarbonization program modeled after the existing Energy Smart Eastside program for single-family homes. MEASURABLE The city will convert 1,000 units in existing multifamily buildings per year to high-efficiency heat pumps and improve weatherization. ACHIEVABLE This program needs a minimum of \$___ to support this program for the city to provide suggestions and options for finding financial assistance to low-income tenants and/or building owners. This funding should come from the city and be ongoing. Further funding of \$___ via city allocation or grants will be sought to provide additional funding to help low-income and affordable housing multifamily buildings with heat pump conversion. RELEVANT Since 46% of city GHG emissions come from existing buildings and the main source of fossil-fuel burning is for heating, focusing on electrifying heat sources is key especially since the electric grid is moving to 100% renewable electricity generation. Converting 1,000 units per year from fossil fuel to electric heat pumps will avoid, on average, ## MTCO2e per year.



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	TIME-BOUND The city will launch this program in January 2027. More specificity and clarity is needed throughout SBP. For example, "avoid more than 706,000 MTCO₂e by 2030" should read "avoid more than 706,000 MTCO₂e by 2030 compared to the 2011 emissions base regardless of population growth." "Carbon Neutral by 2050" should read "Carbon Neutral by 2050 by reducing GHG emissions by 80% (or 95%?) by 2050 compared to the 2011 emissions base regardless of population growth." As stated in the SBP, the two primary sources of greenhouse gas (GHG) emissions in Bellevue are existing buildings and transportation. As such, those are the areas that the city should focus on to reduce city GHG emissions. There is mention of generating clean electricity, but the City of Bellevue does not control how PSE generates electricity. Electrification of existing (and new) buildings as well as adoption of transit options is and, therefore, these should be the focus. While we appreciate the work on SBP, without clearly stated goals substantiated with specifics, measures, achievability, relevance, and time-bounds, it just sounds like hollow promises. If we are serious about creating a better future for ourselves and for the next generations, we need to make an impact on reducing GHG emissions to truly reduce the causes of climate change. I hope you will revise the SBP substantially to include these suggestions so that we can all see and measure the City of Bellevue's impact on our future.
30	We appreciate the time you put into drafting the Sustainable Bellevue Plan (SBP). It's really important to have measurable goals. We need to add more details on the how, when, and the amount of funding needed. The SBP seems like a bunch of goals without a specific plan and no way to measure success. There are lots of words like study, pilot, trial, but lots of cities have done this before. We already know what needs to be done. We need to stop thinking and start doing. These actions need to be bold and urgent, but SBP seems hesitant with pilots and studies that will only delay implementation of required changes to make a significant difference. I understand that the People for Climate Action have already put together the 12 most effective things cities need to do to tackle climate change. Why not leverage the research they have already done? Sir Isaac Newton wrote, "If I have seen further, it is by standing on the shoulders of giants." Why don't we leverage the work cities around the country have already done to jumpstart climate actions in Bellevue? As a person in my early 20s and a resident of Bellevue since birth, I'd like to see the city take bold actions to reduce greenhouse gas emissions immediately and in the most significant, effective ways possible. You will also need ongoing funding for these



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	important programs. These must be included in SBP if it is to be effective. There is no time to waste. Please create a future for those of us in the next generation and beyond. Don't hesitate. DO.
31	Since I was in school, teachers have said that any goals need to be SMART - specific, measurable, achievable, relevant, and time-bound. Much of what is in the Sustainable Bellevue Plan (SBP) is vague. Since most of Bellevue's greenhouse gas emissions are from existing buildings and transportation, the SBP needs to focus on those two areas. What can we do to reduce the most emissions as fast as possible? Once identified, what are the specific programs to reduce those emissions? What will these programs cost? Where is that money coming from? You have the goals, now we need the specific programs. The SBP says there will be a lot of pilot programs and studies when what we need is action that is confident with substantial impact. Use programs like the 12 Critical City Climate Actions by the People for Climate Action where the research has already been done on what's most effective and already existing in other US cities. We need significant change and we need it now. Thanks.
32	(Include the essence of this concept in spots within plan:) The targets of this plan have been examined independently. As there is no way to measure the interrelationship of most of these targets, it must be understood that progress in one sector will work against progress in one or more other sectors. For instance: "Trees": Currently, an outsized percentage of the City's trees grow within 1/4 mile of high-capacity transportation. Many of these trees are within valleys holding creeks. The 2050 goal of locating 75% of our residents within 1/4 mile of this transportation will result in virtual obliteration of these trees, along with effects on the various streams that flow through these areas. Thus forcing-out wildlife and probably preventing the resurgence of salmon.
33	I looked through the draft and agree with the Sustainable Bellevue Plan. I agree with Don Marsh's comments about the goals and the future needs to be addressed. Another thought with the tree maintenance that is needed for young and older trees is that the city might setup a forum to attract registered tree arborists with the idea of incentivizing them to give a discount to Bellevue subdivisions where a significant number of property owners would like to know the needs of their trees at a reasonable fee for a given time and area. This seems to advocate for the health of the trees and help the arborists to narrow their focus on known owner request. Since the city would sponsor the arborists, it would require that they be for the trees and provide owners with some



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	confidence. This would be a win-win-win with little outlay by the city and owner confidence who they are getting and a win for the arborist in stabilized revenue in a small region of the city at a time. Of course, this would be a big win for the city in assuring canopy stability through timely maintenance.
34	Betsi Hummer's feedback to the 2026-2030 Sustainable Bellevue Plan Page 1 What science supports or detracts from the statement "experiencing The heat we experience should be compared to previous years, the wildfires are due to poorly managed forests that are governed by politics and not forest science. Please show scientific reports that show several sides of the issue. Page 2 - please define "community greenhouse gas (GHG) emissions. Detail what the current emissions are, and what 50% reduction would be and how that is calculated, assessed and audited. Also detail what GHG emissions do, and include a scientific reference that supports the City's conclusion and a scientific study that does not support the claim. For Bellevue citizens to buy into a program, they are entitled to know from where the data is collected, and what organizations not in agreement have to say. Having access to all sides of an issue is how Bellevue residents and taxpayers will be able to make an informed decision. Please define and include confirming and damning points of view to the following terms that are used throughout the Draft Plan: Climate Change, carbon neutrality, renewable electricity, zero waste, low carbon transportation mode, mobility, climate impacts. page 3 Please detail "Bellevue's longstanding legacy and commitment to advancing environmental sustainability" and, again, climate action - what the heck does that even mean? If I am uncertain, many others are as well. As a Bellevue resident for over 69 years, I am offended that Bellevue's environmental sensitivity doesn't begin until 2007. In the 1970s the Environmental Protection Agency was established, and I personally left every space I occupied better than when I found it. Also, I do not see in the Timeline when McDonald Miller was hired to develop a plan to reduce the City's energy consumption. Also, it does not indicate how many new full time employees were hired by the City of Bellevue to address the Sustainability Plan - these new hires seem unsustainable since City Taxpayers will have to foot their retirement plan when their pension takes effect. Please incorporate these costs into the costs for the Sustainability Plan. Page 4 I am offended that Neighborhood Associations were not included in the Outreach as Community Based Organizations, and that the organizations that were included are not Bellevue Based. I am shocked that I, as a former elected public official and long time neighborhood liaison, was not asked to serve as a community based organization. While the City may be proud of its Outreach, having skewed surveys and only 700 survey respondents out of a city of over 150,000 is paltry feedback on which to base a never-ending, never audited, never verified plan.



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page 5 - continued outreach

80% of 700 is less than 1/10 of a percent of the 150,000 tax paying residents that will pay for this plan. Also, considering how biased the surveys were, it is poor information on which to base a plan that has no end date and no apparent audit.

I was also told that Eastside Urbanists, Complete Streets Bellevue and Eastside Housing Consortium were invited to the stakeholders group - their founders live in West Seattle, Tacoma, and Redmond not Bellevue. I do not see Future 42 or Project 42 or Washington Policy Center included.

Please include studies that show varied results, and compare current studies to historical data. Please include Cliff Mass in your research.

Page 6

provide scientific data from a variety of sources to back up FUTURE PROJECTIONS, not the unscientific City of Bellevue Comprehensive Plan 2044

FLOODING - show all historic flooding throughout Bellevue's recorded history, not just a single event. Again, using the just completed Comprehensive Plan as a reference instead of a scientific document is infantile.

Page 7

IDD YOU KNOW - bomb cyclone.... in 69 years we have had lots of storms, not one of them has been called Bomb Cyclone, and I am certain a more reliable local historical source could be used to put the storm in context rather than "PBS reporters" - if PBS is used, please spell it out so the public knows from where exactly the data was found so they can research it themselves.

Page 8

Indoor air filtration systems have their own production, manufacturing and operating costs - that should be detailed and included in the costing and emissions calculated for the overall emissions.

IF car emissions are so bad, why did the State stop having cars tested?

Show us how changing the emissions from buildings, natural gas, and cars can be changed by improving how the facilities are used and how the fuels are burned, and be sure to include all the production, transportation and maintenance costs of other sources of energy.

Please have the plan detail the differences between houses, housing units, and buildings. Most of the vehicle emissions are from outside of the city where commuters live the lives they want and their autos make their lifestyles possible. Don't dump everything on the people of Bellevue.

page 11

Show how heat pumps differ from other forms of heat

Show how Bellevue will keep track of exactly from where energy comes. For instance, if Puget Sound Energy sells its coal plant to Montana and then buys electricity from Montana, how will we know and how will the emissions be calculated?

Similarly, if wind turbines are built with imported materials in Denmark and shipped around the world to Washington, how will those emissions be calculated into the energy produced?

Who is going to be the multi family recycle bully to go through the garbage and separate aluminum, glass, and compost?

How will the emissions to produce, build and maintain the transit be monitored and



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	accounted for? page 13 Define Climate change, give other words and phrases for it so we all understand what is intended. Define infrastructure Give historical reference to previous emergency events Why do none of the community based organizations include the Neighborhood Associations and HomeOwners Associations? Page 14 "sensitive use area" are they only adjacent to freeways? could they also include our arterials? "Electirfy Buildings" needs to be defined. All buildings have electric lights, and there is a reason electric baseboards fell out of favor - please explain that event. Explain why fossil fuel free is so important. Are renewable energy products built with fossil fuel? Are there other studies showing the energy efficiency and availability of fossil fuels? Just as combustion engines have become more efficient, have other fossil fuel machines become more efficient? Could they be incorporated and cheaper than wind turbines and solar cells that require special minerals? Page 15 Define Scaling Define Renewable Energy Show how much energy could be produced from the existing hydroelectric dams Show reports that show the environmental impacts of manufacturing renewable energy machines versus the utilization and modernization of hydroelectric power
35	The draft plan outlines strategies in five areas: climate change, energy and buildings, mobility and land use, materials and waste, and natural systems. Housing and Sustainability in Wilburton As you update the Sustainability Plan and Critical Areas Ordinance, Bellevue has the chance to show that housing and environmental stewardship can move forward together. Additional housing and commercial growth is clearly needed—on that point, there is no debate. But growth does not need to come at the large expense of green space where environmental sensitivities exist and where trees—in neighborhoods expecting the majority of growth. If redevelopment clears mature canopy and replaces them with impermeable fragmented open spaces, we will undermine the very qualities that make the neighborhood livable for new and existing residents. Bellevue should be asking: how do we design zoning that allows new housing while retaining the mature trees, buffers, and open spaces that make Wilburton livable? Preservation Before Replanting Too often, “environmental enhancements” are used to justify removing mature trees in exchange for planting saplings. This is not sustainability—it is canopy loss. A mature



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stand provides essential stormwater absorption, cooling, shelter and protection for habitat, purifying air pollution that cannot be replaced for decades. Bellevue should prioritize preserving existing mature canopy, with replanting only when there is no feasible alternative. In addition, riparian corridors in particular must be treated as untouchable natural infrastructure, not as areas where tree removal can be “mitigated” to the point of less ecological benefit.

Housing Growth with Balance

Bellevue should be asking: how do we design zoning that allows new housing while retaining the mature trees, buffers, and open spaces that make Wilburton livable?

Balanced, Measurable Growth and Right-Sized Capacity

Sustainability means results residents can see: more housing options and preserved canopy, healthier streams, and connected open spaces. Bellevue should evaluate the rezone against these outcomes, not just the number of units on paper. Smaller living spaces can be delivered with qualities that residents experience well being and increasing quality of life.

Summary

Bellevue is capable of doing both: meeting housing needs while enhancing livability and environmental quality. To succeed, the City must:

- Protect existing canopy and riparian corridors as non-negotiable.
- Shape new housing prioritizing green assets instead of clearing them.
- Set balanced housing capacity at a scale that meets needs without sacrificing long-term sustainability.

This approach does not pit housing against the environment and livability—it means building for people while preserving the natural systems that support them. Just decreasing car emission will not replace the livability of our neighborhoods.

Respectfully,

Phyllis White

Bellevue Resident



Public Comment on Draft Plan via Email

September 2, 2025

- P.5 Building Climate Resilience
 - This is a very helpful page that outlines the existing environmental issues and potential future disasters. The intro paragraph was especially well written, and the conclusion is great too!
- P.8 Measuring Our Emissions
 - “Since these direct sources of emissions are within city borders, Bellevue has a greater ability to reduce them.” This is great news because now the reader believes the issue is much more solvable than previously imagined. The norm is to feel insignificant in a problem so grand.
- P.10 Reducing Our Contribution
 - Please include a short key for how to read the wedge graph. I was slightly unsure at first on what it meant.
- 50% Reduction Target
 - P.22 Three Tiers Of Strategies - states that “The City has already achieved its 2030 GHG emissions reduction target of 50%” (This is also stated in the Townhall Presentation Slides)
- P.12 Focus Area Overview
 - Why a 50% reduction target by 2030? What are the results of this reduction? Explain the idea of what the outcome will be once we reach the target(s) more clearly. Ex: Not reaching a tipping point, based on 2050 goals, or something else
- Climate Change
 - There should be a poll asking the public what type of Climate Resilience programs they would want to see. Ex: cooling shelters, disaster drills, kits, etc.
- Energy & Buildings
 - “Transition to 100% renewable electricity by 2045” - A list/graph of what the different renewable energies being used & their percentage of overall renewable energies should be added. Is the current permitting infrastructure supporting the construction of green buildings, as in, is it the permitting process efficient enough?
 - “Partnerships and pilots” as in new technology or new methods of renewable energy implementation?
- Materials & Waste



Public Comment on Draft Plan via Email

- “Reduce emissions from landfilled waste 17% by 2030” - why is the 2030 Goal of 17% reduction lower than the Current Status of 20%?
- “Zero Waste” - Why is the recycling rate written in this plan lower than the 2021-2025 Environmental Stewardship Plan? Does this consider composting as zero waste?
- “Reduce Overall Waste Generation” - Good projects could be workshops on Reduce - Reuse –
- Repair - Recycle, Repair Fairs where people bring their slightly damaged items to be repaired instead of trashing the item, etc.
- More information on food waste and its implications would be nice.

Other Ideas/Questions:

- A full list of the “What You Can Do” resources should be somewhere so people can easily find all the resources/steps their home or organization should full
- Can you track how many people use each resource given? This will be helpful in determining what links people like to use/find helpful to them.
- An online counter that tracks how many people have taken the actions needed to reduce GHG emissions. This way people can easily see the progress being made. (P.11) Ex: 10/21/2026 : 220/6000 : Single family homes converted to highly efficient electric heat pumps
- This is something quite similar, however, from what I have seen, there is no recent public activity. <https://eastsideclimatechallenge.org/bellevue>

Future Presentations of This Plan Should Include:

- The Issue (P.5)
- Current Progress & Most Pressing Problems - “Our Progress Graphs” (Townhall Presentation Slides), Climate Change & Energy and Buildings (huge jump between current status and 2030),
- Solvability (P.8)
- The Goals
- What We Can Do



Public Comment on Draft Plan via Email

- This might have already been mentioned, but what resources/studies were done to find the Current Status percentages? Are these percentages an estimate based on a sample group that filled out a survey or everyone in Bellevue?
- What local and state policy, compliance, incentives, and technical assistance are there currently?
Mainly what bills and budgeting for sustainability are currently in place, being processed, and needs to be proposed?
- Is the GHG emission tracking and energy benchmarking already being done on all government-owned buildings (schools, libraries, etc.)?
- In general, more graphs for the specific subsections would be good for conveying ideas or data in a simple way.
- Why are the “Major Accomplishments” different on the Townhall Presentation Slides VS the Sustainable Bellevue Plan? If those listed on the slides are correct, they should also be added to the plan



Public Comment on Draft Plan via Email

September 2, 2025

Hello SB Team

First, congratulations on the draft. I know you are very short-staffed, and this must be a ton of work on top of your project work. Thank you for your thoughtful analysis and strategies. Thank you for your dedication to this work and for your relentless persistence in the face of so many constituencies and demands. Please take my feedback in the spirit of which it is intended, which is to edit and improve the plan and make it the best plan it can be, i.e. one capable of delivering the results we all want so much.

These comments are from me as a resident and member of the Bellevue Sustainability Leaders Group. They do not necessarily represent the thoughts of any organization – either People For Climate Action or 300 Trees. I am sending this as an individual since I am out of the country and unable to coordinate with any groups.

These comments refer to People For Climate Action's report: Twelve Critical City Climate Actions to Reduce Greenhouse Gas Emissions. You should have a copy. If you need one, contact Court Olson.

Excuse any typos.

Strong Points

More specific list of outcomes that need to be achieved by 2030 and a tie to 2050.

More ambitious strategies with near term and long-term strategies mentioned.

Mention of funding requirements.

Suggested Improvements

1. Goals and Outcomes Need To Be Well Defined, Specific and Measurable.

Council, City Staff and constituents are often unclear about what the goals are and often have different interpretations of the goal. This causes confusion, miscommunication and reduces transparency considerably.

- a. It is not clear in this plan if the goal is 50% ghg reduction is by 2030 or 2035.
- b. The '50% by 203x' definition should be unambiguous and include 'from the 2011 emissions base, regardless of population growth.'



Public Comment on Draft Plan via Email

- c. "Carbon Neutral by 2050" needs to be defined specifically and clearly measurable. We should be very clear if it's 80% or 95% ghg emissions reduction by 2050 and include 'from 2011 emissions base, regardless of population growth.'
- d. For both 2030 and 2050, it should be very clear what is included and excluded, for example aviation emissions. We should be aligned on what emissions are we talking about? We need to define it up front and not mix apples and oranges later.
- e. When we say what we are reducing, is it 706,000 MTCO₂e by 2030 and 1.5M MTCO₂e by 2050? Let's be specific. This number is not changing since it's based on 211 base and should be unambiguous. These are the GOALS we are trying to achieve.

2. What Is Bellevue Responsible For?

- a. The wedge analysis included does not help clarify what emissions must be addressed through local Bellevue action. This should be included. Maybe it makes sense to show both the entire wedge analysis as you have done in the past and then show the portion Bellevue will address.
- b. Will Bellevue be responsible for achieving the total reduction objective even if the feds and state fall short? Or is Bellevue only owning the Community portion? That should be clear.
- c. Correlating your strategies to a pie chart like PCA has done would enable readers to understand how the actions correlate to outcomes

3. 2030 Outcomes Must Be Defined and Strategies Must Be Actionable and Measurable

The draft states these OUTCOMES --> 'The strategies in this plan will be transformative for our community's emissions profile. Together with supporting state policies, fully implementing these strategies will reduce or avoid more than 706,000 MTCO₂e by 2030, as the region's electricity transitions to 100% renewables. To achieve that result, over the next five years we will need:

- 6,000 existing single-family homes to convert to highly efficient electric heat pumps
- 19 million square feet of commercial building efficiency upgrades
- 9,000 additional commuters utilizing active transportation and transit as their primary modes of traveling to work and play destinations throughout the city
- 35,000 more zero-emissions vehicles on the road instead of gas-powered ones
- 12,000 fewer tons of waste sent to landfill by residents and businesses



Public Comment on Draft Plan via Email

Given there are only 2 biennia to 2030 the OUTCOMES need to be as follows. There should be no question about our progress toward these outcomes.

- a. Starting in 2027, convert 3000 homes to heat pumps per biennium.
- b. Starting in 2027, convert 8 million sq ft of EXISTING Commercial space under 20,000 sq ft to heat pumps per biennium or some other measurable outcome.
- c. 4500 by 2028 and cumulative 9,000 additional commuters by 2030 utilizing active transportation and transit as their primary modes of traveling to work and play destinations throughout the city.
- d. Starting in 2027, implement X number of new intercity transit routes by 2030.
- e. Starting in 2027, 17,5000 new EV registrations in Bellevue per biennium.
- f. Starting in 2027, reduce tons of waste sent to landfill by residents and businesses by 6,000 per biennium.

The High Priority Strategies to get to 2030 seem to be correlated to the stated outcomes. For example:

The draft states – ‘Priority Strategy - Implement Initiatives to Reduce Greenhouse Gas (GHG) Emissions: Engage the community in greenhouse gas emissions reduction and climate resilience.’ This is not specific or measurable.

The High Priority Strategies should be specific and measurable. For example:
Scale up Energy Smart Eastside program to convert up to 1500 residences to heat pumps per year starting in 2027. Included in our metric will be households who convert independent of the ESE program as we assume people are responding to Bellevue Educational Outreach.

4. The Five-Year Plan Should Be Tied to Well Defined 2050 Goals and Outcomes and Associated Catalyst Strategies Should Be Actionable and Measurable

2050 Outcomes need to be specific measurable goals and Catalyst Strategies need to set us up to get us there. For example, ... fully implementing these strategies will reduce or avoid more than 1.5M MTCO₂e by 2050 (the GOAL).

To achieve that result, over the next twenty-five years we will need the following OUTCOMES:

- xx existing single-family homes to convert to highly efficient electric heat pumps
- xx million square feet of commercial building efficiency upgrades
- xx additional commuters utilizing active transportation and transit as their primary modes of traveling to work and play destinations throughout the city
- xx more zero-emissions vehicles on the road instead of gas-powered ones



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- xx fewer tons of waste sent to landfill by residents and businesses

The Outcomes should be further broken down. For example:

- Convert 3000 homes to heat pumps per biennium through 2050.
- Convert 8 million sq ft of EXISTING Commercial space under 20,000 sq ft to heat pumps per biennium through 2050 (or some other measurable outcome)
- 9,000 additional commuters utilizing active transportation and transit as their primary per biennium through 2050.
- Add X number of new intercity transit routes per biennium through 2050.
- 17,5000 new EV registrations in Bellevue per biennium through 2050.
- Reduce tons of waste sent to landfill by residents and businesses by 6,000 per biennium through 2050.

5. Strategies Should Clearly Tie to Outcomes and be Specific and Measurable

At minimum, this should apply to Priority Strategies

For example:

- Outcome #1: Starting in 2027, convert 3000 homes to heat pumps per biennium.
- Expected GHG Impact by 2050: x metric tons
- Priority Strategy #1.1: Scale Energy Smart Eastside program to convert 3000 homes to heat pumps per biennium starting 2027 and running through 050. (We will count households who convert independent of the program as we assume people are responding to Bellevue Educational Outreach)
- Annual Measure: 1500 converted per year
- Five Year Measure (2026-2030): $.8 * 5500$ (discounted for 2027 start year) = 4400
- Cost: \$x Million per year starting in 2027
- Funding Strategy: ...
- Funding Measure: Target investment achieved
- Priority Strategy #1.2: ... Repeat above for all outcomes and strategies

6. FUNDING IS A STRATEGY and Must be Included in This Plan

I recall Council members requesting several times that the plan include the estimated impact of each strategy and the estimated costs to achieve the results. In the past, we have failed to meet our target outcomes because we have not had an adequate funding strategy. FUNDING is a STRATEGY. If we don't have a strategy to fund this work, we have no way to implement this plan and no way to achieve the outcomes. PCA has a cost breakdown of how to fund the 12 Actions it outlined in its report. Please meet with Court Olson to review that. (I am out of the country)



Public Comment on Draft Plan via Email

7. Missing Priority Strategies Need To Be Added

The following Priority Strategies need to be added to this plan:

1. Create and fund a Multifamily Buildings Decarbonization Program to decarbonize x multifamily units or buildings per year starting in 2027 and running through 2050.
2. Create and fund a Small Commercial Buildings Decarbonization Program to decarbonize x commercial buildings under 20K sqft per year starting in 2027 and running through 2050.
3. Create and fund a Program to Expand Employer Programs That Encourage Alternatives to Driving to Work to reduce x car transit trips per year starting in 202x and running through 2050.
4. Create and fund a program to incent 17,5000 new EV registrations in Bellevue per biennium through 2050 starting in 2027.
5. Create and fund a program to convert x Existing Multifamily Buildings building to 100% EV Charging starting in 2027.
6. Establish and fund a Robust Climate Action Public Education Program that runs through 2050 starting in 2026.
7. Create and Fund a City of Bellevue Green Bank to provide low-cost loans for decarbonization purchases by Bellevue commercial building owners and all residences.

8. Missing Catalyst Strategies Need To Be Added

1. Adopt a Large Buildings Electrification Ordinance by 2028. See PCA Plan.
2. Expand EV Charging Requirements for new Multifamily Buildings to all parking spaces starting 2028. See PCA Plan.
3. Create and fund program X number of new intercity transit routes per biennium through 2050 starting in 2028. See PCA Plan.

9. Add an Implementation Plan to Get to 2030 or 50%.

No discussion of what it's going to take to implement the plan. How can you make the 50% goal unless we are prepared to ramp up quickly. If an Implementation Plan cannot be included in this strategy document, then a separate Five-Year Implementation Plan should be adopted at the same time the SBP is adopted. Program costs and strategies for financing the plan must be included.

10. We Need to get Very Proactive to Engage the Public.

As we have discussed, the general public is unaware of what they need to do to address climate change. We need to scale up education and messaging exponentially starting in 2026.

11. Climate Impacts we see in Bellevue need to be amplified.



Public Comment on Draft Plan via Email

I guess my frustration is the lack of awareness on the part of the public. We should not gloss over the impacts of carbon pollution:

- a. Tree health and canopy
- b. Stream and aquatic health
- c. Lake health and safety
- d. Drought and reduced snowpack
- e. Agriculture threats and food insecurity and high healthy food costs
- f. Forest health
- g. Rising cost of healthy living. Costs are out of reach for low- and middle-income families

-- Barbara Braun

September 4, 2025

Hi Colin,

Thank you for providing PSE with an opportunity to comment on the 2026 – 30 Sustainable Bellevue Plan.

Overall, we are very pleased with the city's numerous commitments and efforts to coordinate and partner with PSE by supporting many of our programs and initiatives. Thank you!

- *P.25 – C.2.4 Review high utility-caused wildfire risks and develop a collaborative mitigation plan*
 - If helpful, please find a copy of our 2024 Wildfire Mitigation Plan attached
 - Or, PSE's Wildfire Mitigation Plan can be found [HERE](#)
- *P.34 -N.1 Sustainable Tree Canopy and Open Spaces*



Public Comment on Draft Plan via Email

- Please add a section N.1.6 stating something like, "In order to properly balance electrical reliability with neighborhood aesthetics, select appropriate tree species when planting under, or in proximity to power lines".

Again, thank you for your efforts and consideration.

Sincerely,

Matt Larson

Local Government Affairs and Public Policy Manager

[PUGET SOUND ENERGY](#)



Public Comment on Draft Plan via Email

September 5, 2025

September 5, 2025

Dear Mayor Robinson and Councilmembers,

I am writing to share the support of SAFE Cities at Stand.earth for the draft Sustainable Bellevue Plan. We applaud the City's dedication to meeting its climate goals and increasing community resilience.

In particular we want to voice our support for the Priority and Catalyst Strategies in the Energy & Buildings section for reducing air and climate pollution from publicly and privately owned buildings, both new and existing. This is a critical policy area if the City is going to meet its climate goals and these strategies will also improve health, safety, and energy efficiency. Together the strategies draw on the City's local leadership and its active partnerships in the State and region's work toward climate goals, creating a sound approach with robust impact. We urge you to support these strategies as part of the Sustainable Bellevue Plan and to direct staff to begin moving forward on them after the plan's passage.

We appreciate the leadership of the Council and staff in drafting a plan with significant benefits for the people of Bellevue as well as regional and global climate.

Thank you,
Anne Pernick
SAFE Cities Senior Advisor
Stand.earth



Public Comment on Draft Plan via Email

September 7, 2025

Hello Environmental Stewardship team,
On behalf of the People for Climate Action Bellevue chapter of over 250 members, I'm offering the following comments about the draft Sustainable Bellevue Plan.

It's easy to see that the new SBP draft is better than the old 2020 ESP. That said, as drafted, the new SBP doesn't have the horsepower to put us on track to hit Bellevue's 2050 greenhouse gas reduction target. Consequently, PCA has recently begun meeting with you and other city officials to strongly recommend that the City's draft SBP be modified to include all twelve actions which are detailed in PCA's "Twelve Critical City Climate Actions" report that was issued in late July.

We have previously shared that full-page report with you. For reference purposes in this comment, here below is the report's table of contents listing all twelve critical actions.

FIVE ACTIONS FOR EXISTING BUILDINGS

1. Expand the Energy Smart Eastside Program
2. Create a Multifamily Buildings Decarbonization Program
3. Create a Small Commercial Buildings Decarbonization Program
4. Adopt a Large Buildings Electrification Ordinance
5. Adopt a Home Energy Score Posting Ordinance

FIVE TRANSPORTATION SECTOR ACTIONS

Three Actions to Promote Multi-Modal Travel

6. Promote Public Transit Use
7. Increase Safe Biking and Pedestrian Pathways
8. Promote Employer Programs That Encourage Driving to Work Alternatives

Two Actions to Promote EV Charging at Home

9. Expand EV Charging Requirements for New Multifamily Buildings
10. Promote EV Charging in Existing Multifamily Buildings

TWO SUPPORTING ACTIONS

11. Establish a Robust and Ongoing Climate Action Public Education Program
12. Establish a Dedicated Climate Action Funding Stream

As shown above by the first and second capitalized contents banners, we feel strongly that cities such as Bellevue need to focus attention on reducing greenhouse gas emissions in the transportation sector and in the existing buildings sector. Together, these two sectors account for 78% of Bellevue's latest (2023) greenhouse gas inventory. To visually drive home the point, we have been sharing Bellevue's posted 2023 greenhouse gas emissions



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pie chart along with important annotations that we have added. Unfortunately, this comment form doesn't allow us to include the annotated chart here.

In discussing that emissions pie chart, we've been pointing out that a 33% slice of the pie is caused by fossil fuels used in generating the electricity on the grid. By 2045, PSE plans to eliminate those emissions and have a clean grid. So, the city need not worry about cutting those emissions.

However, the city *does* need to focus heavily on actions to cut the 19% slice of the pie caused by the burning of fossil fuels (mostly natural gas) in buildings. Neither PSE, nor current state or federal programs, will cut those emissions. Highly impactful actions by the city are needed there.

That is why we highly recommend the first five actions in PCA's list of twelve critical climate actions.

Also, the city needs to focus on more impactful actions to rapidly shrink the 26% pie slice that represents emissions from on-road vehicles. Though the State's law banning the sale of new gas-fueled cars in 2035 will be a big help, we think Bellevue should accelerate ambitions of people to switch to EVs, and also encourage more use of alternative transport modes like public transit, vanpools, bikes, etc. Actions six through ten in PCA's list of twelve critical actions do just that.

Unfortunately, if a person only takes the time to hastily scan through the city's *Sustainable Bellevue Plan* and look for the twelve actions that are in PCA's list of critical actions, they will find what appear to be several commonalities and, at a casual glance, what appear to be matches. However, in all but one instance, that would be an incorrect assumption.

I personally have a different comparative view, based on the following recent experiences:

- I am very familiar with the details in PCA's *Twelve Critical City Climate Actions* report, since I did the final editing and looked over all of the reference links made in it.
- After a fair amount of analysis, I have a good idea of the scale needed for an impactful and viable long-term implementation plan for each of those twelve actions.
- I have read the 40-page narrative that the City of Bellevue staff published when they posted their draft plan in mid-August.

While the city's newly drafted plan touches on several of the subjects in PCA's list of twelve actions, Bellevue's draft plan is in most places quite sketchy and largely hesitant in



Public Comment on Draft Plan via Email

approaching them. When we read the narrative posted with the SBP carefully, we find that many of the city's actions that seem similar to PCA's critical twelve actions are described with a limited scope compared to what PCA advocates for, and those descriptions often use terms such as "study", "consider", and "test pilot." As PCA's 52-page report demonstrates, other cities in the U.S.A. have already implemented the twelve actions that we advocate. Bellevue need not reinvent the wheel. There is neither the time nor the need for more study.

In short, the urgent need to quickly launch full-scale and decisive greenhouse gas curbing actions is largely missing in the current *Sustainable Bellevue Plan* draft.

Without an emphasis on urgency and a prompt full-scale approach, adoption of the city's current draft plan would doom the city to missing the 2050 emissions reduction target. In our analysis, all of the actions on PCA's list of twelve must be promptly launched at full scale during the city's next 2027–28 biennium budget period because most of those actions require at least 20 years to have their full impact. Therefore, they all must be fully underway before the start of 2029. Only a full-scale and rapid mobilization of these actions in that next biennium budget time frame can get us where we need to be by 2050. (By the way, we have drafted an implementation plan timeline for Bellevue to get all of the 12 actions underway before early 2029.)

In conclusion, there is much more detail that could be said about the plan, but space and time do not allow it here. The plan is better than the old 2020 plan, but not sufficient in depth, breadth, and urgency to get us to the ultimate 2050 greenhouse gas emissions commitment that the city has made. Without considerable strengthening to the extent that People for Climate Action advocates in its list of twelve critical actions, this plan would doom the city to missing that 2050 emissions target.

People for Climate Action leaders remain eager to carry on this discussion further with city officials in hopes of enhancing the SBP so that it comes into alignment with that necessary 2050 emissions goal.

Thank you very much for this opportunity to comment.

— The People for Climate Action Bellevue leadership team



Public Comment on Draft Plan via Email

September 7, 2025

Action Items

1) Eliminate (phase out promptly) gas-powered yard equipment in Residential Zoning areas, including but not limited to, leaf blowers, hedge trimmers, edgers, weed whackers, push lawnmowers, chainsaws with bars less than 20-inches. (OK to keep motorized equipment for road and park crews.) Gas-powered yard equipment are a significant contributor to GHG and other harmful emissions such as particulate and noise. (Ref EPA, National Emissions from Lawn and Garden Equipment - IEI 2015 Paper_Final_041015) Gas-powered yard equipment are a convenience, not a necessity. They save the operator money, but impose the cost of air pollution and noise pollution on the rest of the public. They are a public nuisance. (Co-benefit: noise reduction)

2) Enforce vehicle noise regulations. Various drivers have modified engine tuning to cause backfire, producing VOC, UHC, CO, particulate emissions and noise. Others have purchased cars that were offered without a muffler meeting the requirements of the WAC, that is cars that were designed specifically to make loud noise. These drivers cruise around in circles, not to any designation or errand, but rather just to draw attention to themselves, and to harass and annoy the general public. Once their ability to use their car as a noise maker is taken, this superfluous driving will stop and eliminate the associated GHG and noise emissions. (Add a block on your diagram on page 11 for elimination of detuned cars and superfluous driving) (Co-benefit: noise reduction)

3) Urban trees are a net producer of GHG; not a greenhouse gas absorber. The secondary effects of urban trees dwarf and negate the beneficial effects to GHG. The negative effects include:

- Power used for maintenance; trimming, leaf blowing, detritus pick-up, and transportation,
- Power used for removal; chainsaws, branch grinders, hauling
- Power used for repair of homes and property damaged by falling trees
- Repair of infrastructure damaged caused by falling and uprooted trees, power lines, communication lines, water lines, and gas fuel lines.
- Power used to repair root damage to sidewalks, roads, driveways, foundations, water lines and sewer lines.
- Roof maintenance from leaf and needle deposits, clearing of culverts
- Respiration; decaying trees and leaves return captured carbon dioxide to the atmosphere.



Public Comment on Draft Plan via Email

- In northern climates (Bellevue) trees block sunlight and require additional energy for lighting and heating
- Asthma and allergy treatment from pollen and particulate emissions resulting from leaf blowing and tree maintenance activities
- Harmful psychological effects of the noise associated with tree maintenance and storm damage repair activities.
- Urban tree count and size should be held to the minimum needed for aesthetics and shade on hot days.

Questions

- 1) GHG reductions from electrification assume all electric power is renewable, correct? Page 9 "... as the electricity grid transitions to 100% renewable energy"
- 2) Page 9. If refrigerants are 5%, is there a plan to proactively remove them or do you plan to let them phase out as appliances fail and are replaced with low GHG refrigerants?
- 3) What specifically is "Clean Energy Law" noted on the graph on Page 9?
- 4) Page 11 graph. Is the lawn equipment GHG reduction weighted for VOC and Nox?
- 5) Page 16, materials and waste, why does the reduction go down from present to 2030?
- 6) Page 19. "The urban tree canopy provides many benefits for community livability and resilience; neighborhoods with higher tree canopy remain cooler during heatwaves and have better air quality and stormwater absorption compared to neighborhoods with low canopy." Can you document this statement? ... or is this dogma?
- 7) Page 19: "... Given that Bellevue will also experience more intense and frequent rainfall events," Can you document this statement? Or is this dogma? I have yet to see a rain storm worse than 1987.
- 8) Page 28. What is meant by thermal energy networks in building design

Rhetorical Questions

- 1) Page 27; solar collectors. This should include opening up of tree canopy to allow sunlight to reach solar collectors.
- 2) Why no mention of cool roofs?
- 3) Page 36. N.4.2 low-maintenance lawns and yards; needs more emphasis (co-benefit, noise and particulate reductions)
- 4) Page 36, N.4.1 Under "resilience" why not have water wells drilled in each neighborhood for emergency water supply?

Comments



Public Comment on Draft Plan via Email

- 1) Section “building climate resilience” , do you not see the contradiction between Page 6; “Increasing tree canopy across urban heat islands in Bellevue can reduce peak summer heat by 2-9°F” and Page 7; “bomb cyclone” to unleash a deadly storm of heavy rainfall and severe winds that resulted in damages across the community including extended power outages, fallen trees, loss of life, and destruction of personal property”? The destruction described was due to falling trees, not the storm itself.
- 2) Page 6; Do you not see the contradiction between “MERV 13 filters for air infiltration at community facilities that serve high-risk populations can reduce indoor exposure to smoke and other harmful respiratory particles up to 70%” and the air emissions associated with tree maintenance and tree pollen?
- 3) Section “building climate resilience” , do you not see the contradiction between Page 6; “Increasing tree canopy across urban heat islands in Bellevue can reduce peak summer heat by 2-9°F” and Page 7; “An intense storm hits Bellevue and knocks out power for several days”? The storm did not cause the power outage; the falling trees did.
- 4) Page 6; the flooded culvert is an engineering miss, not necessarily a symptom of climate change. Sustainability is an imperative for civilization. There is no need to create mythology to justify it.
- 5) Page 7; the bomb cyclones are so infrequent that they can not be related statistically to climate change. Refer to; Columbus Day 1962: Memories of storm that roared still vivid | The Seattle Times. Sustainability is an imperative for civilization. There is no need to create mythology to justify it.
- 6) In Bellevue and northern latitudes, the benefits of climate change include; lower heating bills in the winter, less snow removal cost, less ice and snow related accidents and property damage.
- 7) Page 8 “Air pollution negatively impacts respiratory health and can increase the risk of cardiovascular disease and certain cancers.” Action items above will improve air quality.
- 8) Page 17, mobility and land use. Add promotion of “work from home”. A corollary to this would be to keep residential noise levels down to make “work from home” comfortable and productive.
- 9) Page 17, “....land use planning can facilitate connected neighborhoods, quality of life improvements, and access to walkability” Bridle trails needs a connector trail segment under the 136 Ave NE power line between NE 37th St and NE 40 th ST. Can you make that happen?
- 10) Page 35 N.1.5. same comment as above regarding a connector trail segment.
- 11) Page 35 N.2.1 “mitigate pollution from electric yard equipment”??? Did you mean “gas”?
- 12) Too much emphasis urban “heat islands”. A dense urban area has more energy input, more people, more air conditioners, and vehicles. We should expect it to be hotter. Yes;



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have some trees for aesthetics and shade. No; to trying to make a skyscraper district as cool outdoors as a rural area.

13) Page 5; Too much emphasis on “what people think”. People can be misled. Let science be your guide.

14) Page 6, “reduce peak summer heat by 2-9°F.” “heat” should be replaced by “dry bulb temperature”. “Heat” as a technical term is not measured in Fahrenheit.

September 7, 2025

Dear Ms. Ewing,

In my capacity as a co-founder of 300 Trees, board member of Trees4Livability, chair of the Washington Clean Energy Coalition, long-time participant in Puget Sound Energy's long-term resource planning process, and member of the Sierra Club Washington State Energy Committee, I would like to comment on the Draft 2026-2030 Sustainable Bellevue Plan. The organizations I represent applaud Bellevue's sustainability goals and programs. Compared to many cities around the country, Bellevue is on the leading edge of climate response. And it should be, considering that Bellevue's residents are highly educated, technology literate, environmentally aware, and affluent. Although the cost of living in Bellevue is high, we have more resources than most to lead the way in mitigating risks for our children and future generations around the world.

In our comments, we would like to focus on three areas:

1. Electrification. To reduce approximately 20% of Bellevue's emissions that result from the distribution and combustion of natural gas, the Dra Plan relies heavily on state legislation and the willingness of our energy utility, Puget Sound Energy, to implement it. There are worrisome signs that PSE is not on board.

2. Holistic vision. To help citizens understand the promise and practical details of Bellevue's sustainability goals, it would be clarifying to describe what daily life in our city will feel like when we have achieved these goals. We will endeavor to provide an example in the context of a specific neighborhood enhancement project.

3. Expanded tree canopy programs. Bellevue has led the region in its support for tree giveaway programs and thoughtful codes to protect large trees. But that might not be enough to maintain 40% canopy coverage over the next 25 years. We suggest some new policies that could boost tree canopy, especially in low canopy parts of the city, and reduce the intensity of urban heat islands. The organizations I've mentioned and others (for



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example, People for Climate Action and 350 Eastside) are eager to engage with Bellevue and help make the Sustainable Bellevue Plan a resounding success.

Electrification

According to the City of Bellevue 2023 Greenhouse Gas Emissions Inventory, natural gas accounts for 14% of Bellevue's total greenhouse gas emissions. The most promising strategy to reduce these emissions is to transition residential and commercial buildings to use only electricity, with the expectation that electricity will be 100% non-emitting by 2045. The Draft Plan lists many things that Bellevue can do to facilitate this transition, such as Priority Strategies B.1 (Residential Building Decarbonization), B.3 (Large Building Decarbonization Incentives), and B.4 (Green Building). However, the plan expects most decarbonization will be accomplished by Washington's "Clean Energy Law," as illustrated by the biggest box in the chart on page 11 of the Draft Plan: 1

<https://bellevue.legistar.com/View.ashx?GUID=43918C7B-8D6D-4B63-97E2-E024CF795262&ID=13984103&M=F> 3

There is much to unpack in that large box. For example, the box lumps together decarbonization of both electric and natural gas energy sources. The "Clean Energy Law" label combines multiple laws that were passed in different years. The two laws that are especially relevant are:

- Clean Energy Transformation Act (2019). This law, also known as CETA, requires Washington electric utilities to provide "carbon neutral" electricity by 2030 (where neutrality can be achieved by offsetting emissions with credits and financial arrangements). The law requires all electricity to be 100% non-emitting by 2045. It is important to note that Bellevue's electric utility, Puget Sound Energy, has already fallen behind initial targets due to lower-than-expected hydroelectric generation and vigorous competition for clean energy resources.
- HB-1589 Washington Decarbonization Act for Large Combination Utilities (2024). This law applies to just one utility in our state, Puget Sound Energy. It references RCW 80.86.020 (11)2, which requires utilities to develop a plan to "achieve a proportional share of reductions in greenhouse gas emissions for each emissions reduction period on the gas and electric systems." Since CETA requires no emissions from the electric system by 2045, we conclude that a proportional reduction in the gas system would produce no emissions from natural gas in the same year.



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On the basis of these two laws, Bellevue could reasonably expect no emissions from energy supplied by PSE by 2045, five years before Bellevue seeks to be emissions free. Unfortunately, PSE does not seem to be reading these statutes the same way. At a July 29, 2025 meeting of PSE's Resource Planning Advisory Group, the company shared its forecast of electric and gas demand after conservation. The presentation included the following slides. <https://app.leg.wa.gov/RCW/default.aspx?cite=80.86.020> 3
https://irp.cdnwebsite.com/dc0dca78/files/uploaded/2025_0729_RPAGMee ng_Presentation_Final038acbc b.pdf 4

This slide causes concern because the portion of load expected from electrification is almost negligible in the wedge graph. In the table, PSE expects only 4% of the electric load will be served by building electrification in 2045. The asterisk notes that this assumes a "natural rate of heating electrification." In other words, PSE is not planning to take a proactive role in building electrification, leaving it mostly to customers who might choose non-fossil-fuel heating equipment. Unless PSE changes course, Bellevue will almost certainly not meet its building decarbonization goals. Our fears are confirmed by PSE's natural gas demand forecast: This graph shows demand for gas, after reductions due to energy efficiency and codes and standards. The load declines from 90,000 MDth to about 76,000 MDth by 2050, a reduction of about 15% over the span of a quarter century. Unless Bellevue takes very strong action on its own, our city would only reduce emissions from natural gas from 14% to about 12% in 2050.

To avoid the possibility of a stunning failure, the City of Bellevue has three possible courses of action:

1. Instruct Bellevue's city attorney to confirm or disprove our contention that HB 1589 requires PSE to develop plans to eliminate emissions from natural gas by 2050. If so, PSE could switch to nonemitting alternative fuels or get serious about holistic electrification of buildings to achieve this goal.
2. Develop city policies and codes to force electrification of all buildings within Bellevue whether PSE participates or not.
3. Revise the Draft Plan to acknowledge that there is little chance of achieving our emissions goals without a realistic decarbonization plan from PSE. It is not acceptable for the City of Bellevue to adopt an unrealistic plan and then blame PSE and/or the state when we fail to achieve our goals 25 years from now.

A holistic vision



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The purpose of the Draft Plan is to lay out goals and priority strategies needed to achieve the goals. Such a document is important for planning, but it doesn't provide average citizens with a vision that might inspire and motivate them to support the plan and persevere through inevitable challenges. We would like a more visionary and holistic story that can excite residents and provide hope that a better world is feasible, especially at a time when uncertainty and climate dread are rampant in our press and politics. This could be a separate document if the Draft Plan isn't the right place for it. To illustrate specific ways Bellevue's goals could support each other, we offer a vision of the future that combines Factoria's Neighborhood Enhancement Plan, heat island mitigation, business development, community building, equity, clean energy, climate resilience, and multiculturalism. The details of each element are not as important as a coherent vision of all these elements working together. To achieve beneficial results, we need to see these policies in concert, not siloed in departments or applied one neighborhood at a time. This is a whole-city way of engaging our community, our businesses, and our energy utility to achieve win-win-win results.

Imagine this scenario.

It's a warm evening in the summer of 2030. A family of four living in the Somerset neighborhood is deciding what to do tonight. They check a schedule of multicultural events going on throughout the summer at Factoria Mall. On this evening, there will be live music and some standup comedy happening on the well-landscaped plaza behind the mall. Both the parents and the kids enjoyed the last event they went to on the plaza a few weeks earlier, a celebration of art from different cultures and traditions. They have also enjoyed the Farmers Market that sprouts up on the plaza from late spring to early fall.

The family decides to ride their e-bikes on the well-marked bike lanes from their home to the mall. It's a fun, easy coast down to the mall, almost as quick as traveling by car. Later, the electric motors will make the climb back up the hill quick and easy compared to human power alone. When they arrive at the mall, they find many of their friends and neighbors have come. There are tables available in the shade of large trees and overhead solar panels, offering some protection as the sun is still shining and temperatures are near the high for the day. The kids run over to the food truck park (like those in Portland) that offers affordable foods and drinks from many different cultures. In a few years, there could be small restaurants with indoor and outdoor seating, but for now, these less permanent businesses serve customers of all kinds – high school students who walk over from Newport High School, hungry shoppers who are visiting the mall or charging their EVs in nearby stalls, and people from all parts of Bellevue who come for the events or new



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cuisines to sample. For example, one of the food trucks offers Ethiopian food, the first of its kind in Bellevue. There is also a German/Bavarian truck offering a “biergarten” vibe, and a Laotian truck with ethnic food not available elsewhere in the city.

The popularity of the plaza grows in a virtuous cycle. The more people go for fun, relaxation, and entertainment, the more others want to go to partake of the community atmosphere. The multicultural feeling of the place allows Bellevue’s diverse population to meet and appreciate each other. It’s a place you want to be because there is always something going on, and it’s just a beautiful place to hang out. People start bringing games to play in the afternoon and enjoy a snack or a drink. 4 <https://cartopiafoodcarts.com/> 6 But the beauty is more than skin deep. As our family enjoys the music and lights (as the sun finally sets), they may not be aware that a large chunk of Factoria has just lost power. The strain of air conditioners working late in the afternoon has overwhelmed PSE’s Factoria substation.

But this night the lights and the music never glitch because a large capacity battery bank is nearby. In normal circumstances, the batteries store power generated by solar panels on the mall roof and over the parking lot, then provide power to superchargers in nearby parking stalls. When a power outage occurs and the sun isn’t shining, PSE can redirect electricity from the batteries to serve the community for a couple of hours while repairs are made to the substation. In a life-threatening emergency, the batteries can power Newport High School, which has been reinforced to serve as a community resilience center during extreme weather or natural disasters like the “Big One” earthquake. The cultural and entertainment attractions (as well as steady power) benefit businesses of all kinds and sizes. The mall is relatively quiet and lonely today (although the T&T Supermarket has become a destination for many residents, especially Asian immigrants and their descendants). It’s problematic that there aren’t many other stores that are unique enough to draw people from neighborhoods farther than a few miles away. This begins to change when there is a community space that hosts events that many people would travel to see. People will do multiple things at the mall, not just pop in and out of the one store they needed to visit. The food trucks (coupled with an attractive place to eat) also provide multiple benefits. First, the food encourages people to hang out for a while instead of wandering away when they get hungry or thirsty. Second, it provides diverse choices for people of different ethnicities as well as foodies who are looking for new tastes to sample. Third, it gives aspiring restaurant owners a way to get started with lower rent and operating costs. Portland has multiple food truck parks, and they seem to be doing well. A covered eating area is necessary when it is wet or hot outside (see second photo below). 5



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The Factoria substation serves about 4,500 customers. One of its circuits exceeded PSE's average outage duration in 2024, according to Bellevue's annual Electrical Reliability Report.

How could it happen? We have barely scratched the surface of all the possibilities, but let's take a closer look at what we have today to work with. Here is the rear parking lot at Factoria Mall which is rarely more than 1/4 full (photo attached). That is a tremendous waste of potential! The space is not only badly utilized, but it is also a significant source of urban heat, making Factoria approximately 8 degrees hotter than the average Bellevue neighborhood. The small, widely spaced trees provide almost no shade. The red circle shows 6 cars huddling in the shade of one tree, but all the other cars are baking in the sun.

Now consider this parking lot at University Village in Seattle: Even though this is a much smaller parking lot, at least 26 parking spots are enjoying shade. Even when no cars are present, the shaded asphalt isn't absorbing heat. To compensate for loss of tree canopy required to build new projects and housing, Bellevue needs to work with parking lot owners to emulate University Village. Aside from the heat, more shade from trees makes the whole area more attractive and encourages people to stay and do other things. Like outdoor dining. Can you imagine outdoor dining anywhere around the mall today? It's just too hot, bare, and ugly.

Energy planning

We feel that our city government is more passive or disengaged with energy planning than it would be if our city were served by a municipal utility (like Seattle is). To achieve our sustainability goals, Bellevue and PSE must work in closer partnership. One opportunity is to find a way to leverage the huge bare roof over Factoria Mall. An expanse this large could generate several megawatts of electricity to feed batteries for EV charging (and perhaps other things).

The mall merely needs to follow the example of nearby Newport High School, which has many solar panels installed already (and room for more!) But the mall has even more ways to generate energy and mitigate heat. In areas of the parking lot that aren't shaded by trees, solar panels can be installed overhead. You can read about a successful installation in Las Vegas: <https://lasvegasweekly.com/news/2024/jul/25/solar-panels-parking-lots-fightheat-island/>. This is an example of what priority strategy B.2.1 might look like. And it probably can't work without PSE's involvement.

Expanded tree canopy programs



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We are grateful for Bellevue's support of tree giveaway programs and code revisions that protect large trees. But when we look at the priority strategies in the Draft Plan (listed under Resilience Strategy N.1), we are not convinced that these are sufficient to maintain 40% tree canopy coverage by 2050. We see difficult challenges coming, such as warmer and drier conditions that will increase mortality of native trees, the need to build more affordable housing, the disturbing trend of squeezing very large houses on small lots, and large infrastructure projects like transmission lines and freeway expansion. It is not easy to eliminate or mitigate the threats to our tree canopy. However, the City could become more proactive in planning street trees, which have multiple benefits: shading asphalt to reduce heat islands, reducing traffic noise, cleaning the air, and calming drivers. At a minimum, the City should develop a street tree program and web page like Seattle has: <https://www.seattle.gov/trees/plan ng-and-care/street-trees>. To mitigate heat islands, trees in parking lots could be even more impactful than street trees. It's not surprising that Factoria has a higher heat disparity score (+8° F) and lower tree equity than most Bellevue neighborhoods. 6 We would like to see a priority strategy that commits the City to engage with parking lot owners throughout the city and try to find solutions that won't take a decade or more to implement.

Next steps

None of the practical steps we have described in this document can be accomplished through exclusive action by the City. However, the City can help streamline regulations and permits, identify motivations for business owners and residents, and engage PSE to work on joint projects that will make meaningful contributions to our sustainability. Although Factoria has been a convenient case to examine here, we need feasible, holistic plans for neighborhoods throughout the city. We need unifying visions that nearly everyone can understand and support. The issues we face are serious, and the opportunities to make a difference are numerous. We hope these comments are helpful and productive.

Don Marsh
Bellevue resident for 28 years



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September 8, 2025

A lot has changed since Bellevue's last sustainability plan, including dramatic shifts in virtual work, numerous new state climate policies, among other changes. Most notable, however, is the fact that Bellevue has consistently failed to achieve its climate goals and is far from meeting the next goal in 2030, as even city staff admit. A major reason for that failure is that past plans have been unrealistic.

As the city updates its sustainability plan, it should take those factors into account and see the new plan not merely as an opportunity to adjust the plan but to learn from the past failures and meaningfully change the approach to how the city addresses environmental issues. It is time for the city to eliminate wasteful subsidies and regulations, end the duplication of policies where the state is already acting, and focus on efforts that make Bellevue more livable.

I have worked on climate and environmental policy in Washington state for a quarter century, as a staff member of the Washington State Department of Natural Resources, a member of the Puget Sound Salmon Recovery Council, as an environmental policy analyst and author of two books on environmental policy. I advocated for a revenue-neutral carbon tax and every year I invest in projects that cut my personal carbon footprint to zero or near zero.

Over 25 years, I have watched cities and the state make the same mistake again and again by focusing on climate symbolism rather than environmental effectiveness. The result – not just in Bellevue, to be fair – has been a consistent pattern of failure.

According to the [city's climate dashboard](#), Bellevue's community-wide GHG emissions have increased nine of the last 12 years. In 2023, the most recent year with data, emissions were 35 percent above the city's target. To meet the 2030 goal, Bellevue would have to reduce emissions between 2024 and 2030 by the equivalent of 1.6 COVID-level reductions. Emissions would have to decline by more than eight percent a year for every year between 2024 and 2030. Citywide emissions have not declined since 2020, making that rate of reduction virtually impossible.

Given the fact that it has been extremely difficult for the city to reduce emissions at all, let alone at the rapid pace required by the current targets, the updated sustainability plan



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should adopt three policies that can help the city become more effective at promoting environmental stewardship during the next five years.

First, focus on things that directly benefit city residents and are within the city's control. For example, improving the tree canopy, promoting clean water for fish, and improving transportation infrastructure to reduce traffic congestion are all key responsibilities of the city and would improve the lives of all Bellevue residents as well as fish and wildlife.

Second, dramatically change or remove CO2 reduction as a goal of the sustainability plan. When the last plan was adopted, there was no comprehensive statewide climate policy. Since 2023, the state has put a hard cap on statewide emissions. Adding city regulations and spending would simply duplicate state climate efforts for additional cost. The city should focus its resources on areas not already addressed by existing state policy. At the very least, the existing goals should reflect realistic goals or, better yet, be based on what is economically feasible. For example, the city could commit to reducing CO2 emissions as long as the cost is below the state's CO2 price under the Climate Commitment Act.

Third, if city officials are required to show they are doing something to reduce CO2 emissions, even if those efforts duplicate state efforts, the plan should require that city-funded projects yield the greatest reduction in CO2 emissions for every dollar. This is the approach followed by Amazon, Microsoft and other companies looking to effectively reduce CO2 emissions. The draft sustainability plan includes some programs that are extremely expensive, yielding extremely small amounts of CO2 for the cost. If the plan is serious about meeting "the urgency of the moment," wasting resources on efforts that yield little benefit to the climate and environment is not defensible.

Complementing – not duplicating – state climate policy

Since 2023, the state's Climate Commitment Act has put a cap on statewide CO2 emissions, imposing a rapidly increasing tax on greenhouse gas emissions to meet that target. In addition, the state has numerous other climate policies including a low-carbon fuel standard, a requirement that electricity is net-zero emissions by 2030, and laws to reduce landfill-related methane emissions, among many others.

Adding additional local policies on top of those comprehensive policies is extremely unlikely to add to total statewide reductions. Instead, city policies are likely simply to cut emissions that would have been reduced in some other way, but at higher cost to Bellevue



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residents. This is one problem with setting local targets in addition to statewide goals. In the same way that it would not make sense for Crossroads or Wilburton to have their own local climate targets, it makes no sense for Bellevue to have goals in addition to the state's existing targets.

Some parts of the city or state may have a more difficult time cutting emissions. For example, Bellevue has seen a significant reduction in emissions and vehicle miles traveled from passenger vehicles since 2019, in large part due to the increase in virtual work. That level of reduction was not available to other parts of the state during that period, meaning Bellevue over-contributed to statewide emissions reductions since 2019.

Additional reductions related to virtual work are probably not available to Bellevue. In the future, however, other parts of the state may have opportunities for CO₂-reduction not available to Bellevue. Setting climate targets for each city ignores these differences in opportunity and makes meeting state goals more expensive without improving environmental outcomes.

Bellevue leaders should also recognize that the city's current climate targets are based on arbitrary political goals and not science. The existing goal of reducing CO₂ emissions by 50 percent (an arbitrary number selected because it is divisible by five and sounds good) by 2030 (exactly at the end of a decade) compared to 2011 (a date chosen because that was when the city council chose to adopt the targets) is not a useful way to plan climate policy. No analysis was done to indicate whether the goal was feasible or cost-effective. Cutting emissions by 50% by 2030 sounds catchy, though.

Instead, the city would be much better off by setting targets based on the cost to reduce emissions compared to alternative approaches. The state's current CO₂ price is about \$58 per metric ton of CO₂. Spending more than that to cut emissions would mean the city is spending more to cut emissions than could be achieved in other ways. An even better metric would be the current market rate to invest in projects that reduce CO₂ emissions of less than \$10 per metric ton.

The city should also use the state's existing tax on CO₂ emissions as a guide to measure results. Projects that reduce the use of carbon-intensive energy calculated to save the city more than it costs would not only be financially responsible by reducing the amount of the CO₂ tax paid by the city and residents, but would reduce emissions efficiently and effectively.



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By way of comparison, using the existing arbitrary and unscientific targets will continue the city's record of promoting approaches that are wasteful and continue to miss the targets.

Where Bellevue should put its resources

Based on those metrics of environmental effectiveness, many of the proposals in the existing sustainability plan are infeasible or wasteful. Others, however, are worthwhile and will make Bellevue more environmentally sustainable and a nice place to live.

Here is a look at just a few of the policies included in the plan and how they measure up.

The proposed “priority strategy” to “engage the community in greenhouse gas emissions reduction and climate resilience” doesn’t mean anything. Purportedly, the city has been doing that for the past 15 years and the results have been awful. Often, the money spent on such “engagement” efforts would be better spent to directly invest in CO₂-reduction projects.

The plan encourages organizations and businesses to “track greenhouse gas emissions” and “develop a plan to reduce emissions.” This, however, is unnecessary. Washington put a price on CO₂ emissions, so businesses are already working to reduce emissions simply by cutting energy costs. That is the purpose of putting a tax on CO₂ emissions – to provide a financial signal and incentive to reduce emissions. That is already in place.

Regarding “Energy & Buildings,” the plan supports an effort to “Reduce residential energy use by addressing natural gas consumption and energy efficiency through programming and partnerships, such as scaling the Energy Smart Eastside program.”

These programs, including installing heat pumps and other efficiency measures, yield tiny reductions in CO₂ for the amount of money in the program. According to Energy Smart Eastside, they have installed 675 heat pumps which have contributed to avoiding 22,700 metric tons of CO₂. That amounts to 33.6 MT of CO₂ reduction by switching primarily from natural gas heating to electric heating and cooling.

Assuming their numbers are accurate, each \$6,000 heat pump subsidy yields 33.6 metric tons of reduction, which is \$178.57 per metric ton of CO₂. That is triple the current state CO₂ price and almost 18 times as expensive as readily available projects to reduce CO₂ emissions at \$10 per metric ton. Assuming Energy Smart Eastside’s numbers are accurate, **subsidizing heat pumps yields about 6 cents worth of environmental benefit**



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for every dollar spent. That is extremely wasteful and is not an effective way to cut emissions.

Sometimes supporters of such projects justify the cost by claiming they also help low-income households cut energy costs. Once again, there are already programs funded by the state and utilities to do this, so it is unclear that low-income households would receive much, or any, benefit. Even if they did, it might make more sense simply to have the city pay the utility bills of low-income families. That would be a win-win – more CO2 reduction and less cost to low-income families.

At the very least, before the city commits to putting more funding into such programs, they should show their math. What is the cost to reduce CO2 emissions of these programs? What is the cost benefit to low-income families? If subsidies for heat pumps yield only 6 cents on the dollar of environmental benefit, the city could easily make better use of the remaining 94 cents to help low-income families and the environment.

The plan also calls for the city to “support solar installations and storage on parking lots and buildings and with community solar projects.” This is one of the most wasteful ways to cut emissions.

According to the [National Renewable Energy Laboratory](#), Western Washington is the worst place in the nation (outside Alaska) to install solar panels. Additionally, Lazard, which is the recognized expert in analyzing the cost of various sources of energy, notes that community solar and rooftop solar are the most expensive ways to generate electricity. Their 2025 “[Levelized Cost of Energy](#)” report released in June shows the cost of community and small-scale solar are more expensive than any form of energy except gas peaking, which is the most expensive. It is triple the cost of utility-scale solar and wind. Subsidizing the worst form of energy generation in the worst part of the country for it makes no sense.

Additionally, numerous studies show that strict “green building” standards fail to live up to their promises while increasing costs significantly. For example, [a study from researchers](#) at Oberlin College in 2021 found that LEED-certified buildings in Seattle reduced CO2 emissions by only five percent despite very high costs. Put another way, the annual CO2 reductions from 23 million square feet in 50 LEED-certified buildings in Seattle could be matched for less than \$1,000 per year.

By way of contrast, using “demand response” can reduce CO2 emissions and actually save money. Demand response encourages people to use electricity when it is inexpensive and



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when energy is likely to rely on carbon-free sources of energy. Seattle City Light, Benton Public Utilities District and many other utilities across the country currently use this approach or will in the near future.

One reason that Bellevue, Seattle, King County and Washington state have all consistently failed to reduce emissions is that programs like Energy Smart Eastside have spent huge amounts of money without auditing or measuring the results. If the updated plan is serious about reducing emissions, it should require that projects are prioritized based on cost effectiveness. Heat pump subsidies and community solar fail any reasonable test of effectiveness. Demand response is likely to end up saving money.

The point is not to believe me – or the National Renewable Energy Laboratory, or Lazard, or Oberlin College, or even the city’s own numbers – showing that proposed strategies are likely to be wasteful and ineffective. Instead, the sustainability plan should require that spending be prioritized where it yields the greatest environmental benefit, allowing the city to see for itself where projects make sense.

Absent such a requirement, it would be clear that the purpose of the sustainability plan is not to help the environment but to choose feel-good projects that sound good politically.

It is time to put the city on a path to environmental success

If city leaders are interested in breaking from the consistent record of failure that has been emblematic of past plans, the 2026-2030 Sustainable Bellevue Plan should adopt three policies.

1. Focus on projects that help Bellevue

Several of the recommendations make sense independent of CO2 emissions. Electricity demand response, increasing the tree canopy, reducing runoff into Lake Washington and Lake Sammamish, and improving road infrastructure all help make Bellevue a better place to live, help salmon and clean water, and make the city more resilient to storms.

As the price of natural gas and electricity increase due to the state’s taxes on CO2 emissions, the city and residents will – and should – find ways to become more energy efficient. How they do that will be unique for each family and company. Rather than government attempting to promote simplistic and costly programs like subsidizing heat pumps, the city should allow the state’s program to work and focus



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on spending resources that provide benefits to the city.

2. **Eliminate or significantly modify the city's arbitrary and unattainable CO2 targets**

The existing goals are arbitrary, political goals which are unattainable and push the city to waste money in a vain effort to meet the targets. I sometimes hear that having goals is useful to give the city something to shoot for. This is clearly not the case since the city has never met the goals. Additionally, unrealistic goals encourage wasteful expenditures.

If the city wants to keep the existing goals or must have goals to meet requirements of the PSRC, city officials should set goals that are more realistic or based in metrics, such as cost effectiveness, that emphasize environmental effectiveness, not arbitrary targets.

For example, the city could change the target from reducing emissions by 50% by 2030 compared to 2011, to reducing emissions when the cost per MT of CO2 is below the current CO2 price set by the Climate Commitment Act. That would be cost effective and would take advantage of the existing state laws rather than needlessly duplicating efforts.

3. **Set metrics of effectiveness for all CO2-reduction expenditures**

If the city makes only one change to the updated plan it should be to set metrics of effectiveness for its projects and prioritize spending based on those metrics. Bellevue, Seattle, King County, Washington state and numerous other jurisdictions routinely miss climate targets because projects are chosen based on symbolic value, not environmental effectiveness.

According to the Washington State Department of Ecology, some of its climate projects cost up to \$144,475 to reduce one metric ton of CO2 that could be achieved with \$10 using publicly available and certified projects from organizations like the Bonneville Environmental Foundation. Without setting clear metrics and strict prioritization, the city may find itself in the same situation. Many of the most effective CO2-reduction strategies are the least politically popular and many that sound good, like rooftop solar, are ineffective. Without setting a strict standard of



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effectiveness, the city's approach will follow the pattern elsewhere of funding feel-good programs that end up failing.

If you have any questions about the data or claims made in this letter, please contact me at tmyers@washingtonpolicy.org.

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