



3.5 LAND USE

3.5.1 INTRODUCTION

This section addresses consistency of the alternatives with city and regional plans and policies. The Affected Environment reviews Bellevue's Comprehensive Plan growth strategy and policies as well as Puget Sound Regional Council's (PSRCs) centers growth strategy. Alternatives are compared to these strategies and policies.

This section also addresses physical land use patterns within and surrounding the Study Area, considering changes in type and intensity of residential, commercial, and mixed uses. Existing land use pattern conditions are based on field reconnaissance, imagery review, and King County and City of Bellevue parcel data. Future conditions consider the level of growth and land use change described in Chapter 2 for the alternatives.

For the purposes of this EIS, the thresholds of significance are:

- Inconsistency with current plans and policies.
- Change to land use patterns or development intensities that preclude reasonable transitions between areas of less intensive zoning and more intensive zoning.
- Differences in activity levels at boundaries of uses likely to result in incompatibilities.



In addition, each alternative is evaluated using performance measures responding to the City Council Guiding Principles, listed in Section 2.3:

- Character, intensity, and extent of transit-oriented mixed-use development around Wilburton station.
- Addressing the eastern terminus of the Grand Connection and station area planning.
- Density of community gathering spaces and increase in usable public space.
- Amount and location of open spaces and parks, including goals identified in the park and recreation system plan, e.g. neighborhood park.
- Height of development, location of roads, and landscaping abutting surrounding neighborhoods creating an appropriate transition to areas of greater or lower density.
- Concentration of development and activity at perimeter of neighborhoods creating an appropriate transition to areas of greater or lower activity.
- Amount of growth on catalyst sites and needed capital facilities. Potential for near-term and mid-term implementation.

The features of the alternatives that can mitigate impacts (e.g. proposed land use code and design standards), other City programs and regulations, and other ways to address significant land use impacts are included.



3.5.2 AFFECTED ENVIRONMENT

LAND USE PLANS AND POLICIES— REGULATORY ENVIRONMENT

The Bellevue Comprehensive Plan presents a three-part citywide growth strategy in Policy LU-1:

Policy LU-1. *Promote a clear strategy for focusing the city's growth and development as follows:*

- *Direct most of the city's growth to the Downtown regional growth center and other areas designated for compact, mixed use development served by a full range of transportation options.*
- *Enhance the health and vitality of existing single family and multifamily residential neighborhoods.*
- *Continue to provide for commercial uses and development that serve community needs.*

The Wilburton Commercial Area is designated as a mixed-use center by Comprehensive Plan policy LU-21. The Plan anticipates future land use changes for the area:

Policy LU-21. *Support development of compact, livable and walkable mixed use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.*

Located along the I-405 corridor, Wilburton has a concentration of offices and hotels, and also includes a significant number of auto dealers and retail stores. This area is anticipated to change significantly due to its strategic location between Downtown and BelRed and its proximity to the freeway and light rail.

Source: Bellevue Comprehensive Plan, 2015, p.45.

Between 2012 and 2035 Bellevue is expected to grow by 15,800 housing units and 51,800 jobs, and, under current plans, Wilburton will take a relatively small share of growth compared to Downtown and BelRed, as shown in Exhibit 3.5-1.

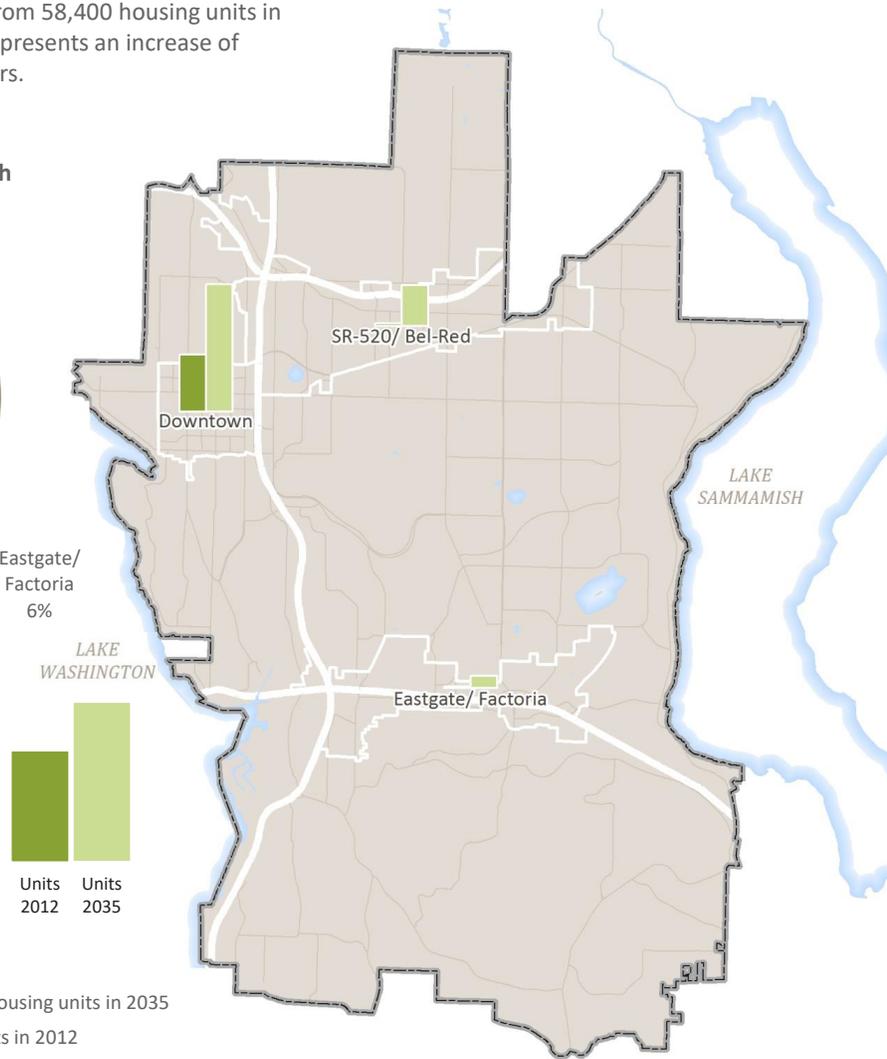
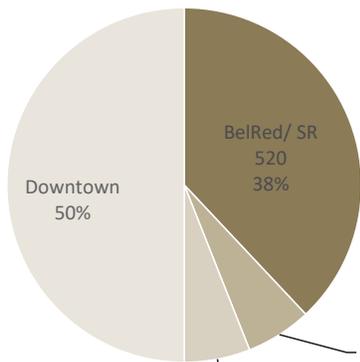
The Comprehensive Plan designates the Wilburton Commercial Area for future land use that mixes medical, office, and retail uses, as shown in Exhibit 3.5-2.



Housing Growth 2012-2035

Bellevue is projected to grow from 58,400 housing units in 2012 to 74,200 in 2035. This represents an increase of about 15,800 units over 23 years.

Distribution of Housing Growth



The remainder of the city is projected to grow by 900 new units by 2035.

Exhibit 3.5-1 Bellevue Comprehensive Plan Figure LU-3, Projected Housing Growth

Source: City of Bellevue, 2015

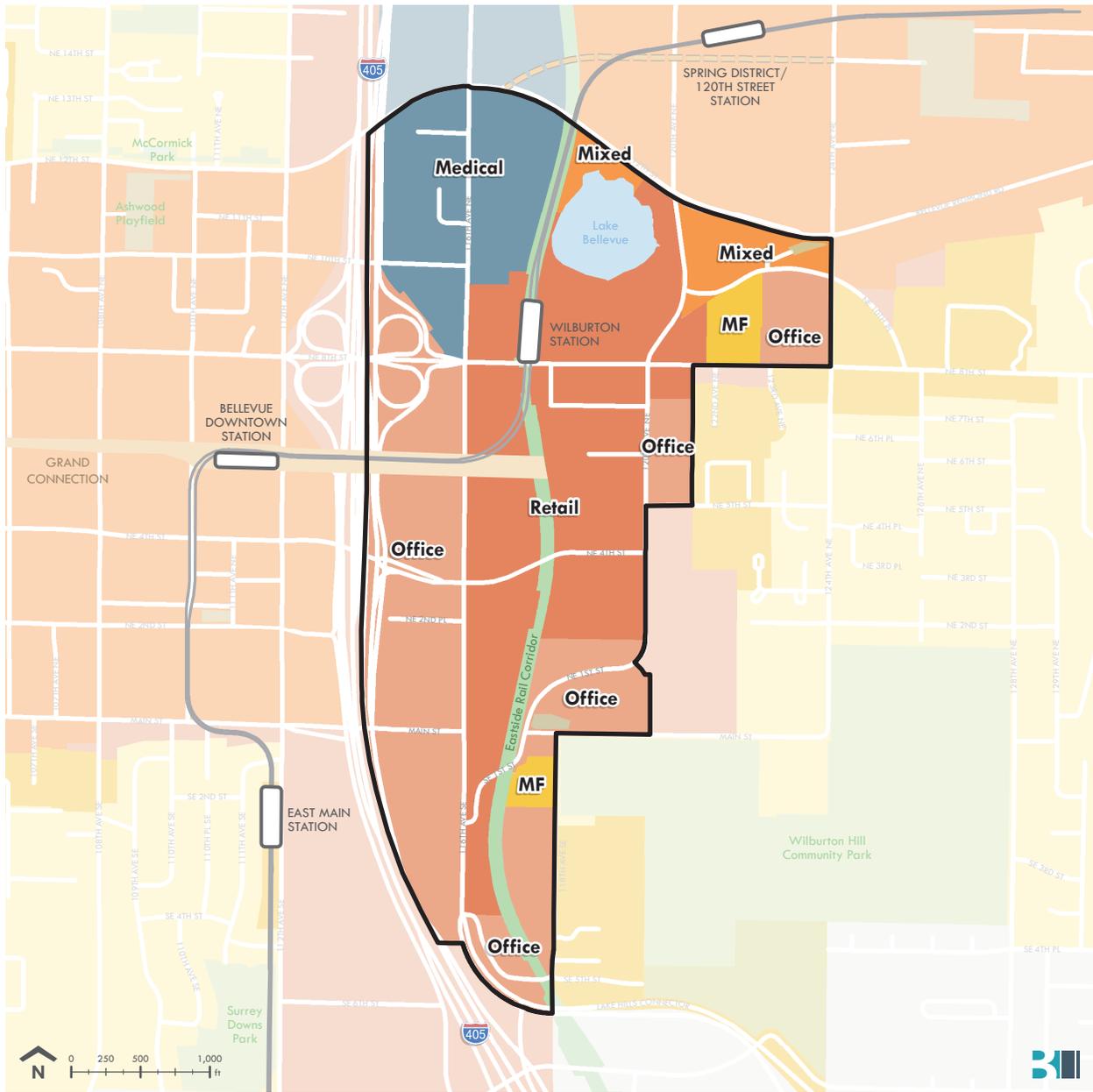


Exhibit 3.5-2 Comprehensive Plan Land Use Designations

Source: City of Bellevue, 2015

- | | |
|--------------------------------|---------------|
| Wilburton Study Area Boundary | Single Family |
| Grand Connection | Multi-family |
| East Link Light Rail Stations | Retail |
| East Link Light Rail Route | Office |
| Spring Blvd-Under Construction | Medical |
| Parks & Open Space | Mixed Use |
| Buildings | |



Bellevue's strategy for growth is consistent with the Growth Management Act (GMA), which restricts urban growth to urban areas to prevent sprawl. This is represented in the following GMA goals:

(1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

(2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.

Source: RCW 36.70A.020

Both the Puget Sound Regional Council's Multi-County Planning Policies (MCPs) and the King County Countywide Planning Policies (CWPPs) direct cities toward a centers strategy, in which urban growth is concentrated in designated regional and local centers, consistent with Bellevue's land use strategy. Regional centers, such as Bellevue's Downtown, are designated in the MCPs, but local centers are also recognized as important to regional growth:

MPP-DP-2: Encourage efficient use of urban land by maximizing the development potential of existing urban lands, such as advancing development that achieves zoned density.

Goal: Subregional centers, such as those designated through countywide processes or identified locally, will also play important roles in accommodating planned growth according to the regional vision. These centers will promote pedestrian connections and support transit-oriented uses.

MPP-DP-11: Support the development of centers within all jurisdictions, including town centers and activity nodes.

In the CWPPs, the overarching goal for development patterns, the general land use policies DP-3 and DP-4, and centers policy DP-38 all support the designation of Wilburton as a mixed use center.

Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently and that protects Rural and Resource Lands.

DP-3 Efficiently develop and use residential, commercial, and manufacturing land in the Urban Growth Area to create healthy and vibrant urban communities with a full range of urban



services, and to protect the long-term viability of the Rural Area and Resource Lands. Promote the efficient use of land within the Urban Growth Area by using methods such as:

- Directing concentrations of housing and employment growth to designated centers;
- Encouraging compact development with a mix of compatible residential, commercial, and community activities;
- Maximizing the use of the existing capacity for housing and employment; and
- Coordinating plans for land use, transportation, capital facilities, and services.

DP-4 Concentrate housing and employment growth within the designated Urban Growth Area. Focus housing growth within countywide designated Urban Centers and locally designated local centers. Focus employment growth within countywide designated Urban and Manufacturing/Industrial Centers and within locally designated local centers.

DP-38 Identify in comprehensive plans local centers, such as city or neighborhood centers, transit station areas, or other activity nodes, where housing, employment, and services are accommodated in a compact form and at sufficient densities to support transit service and to make efficient use of urban land.

Bellevue's Comprehensive Plan also contains subarea plans with policies that affect the Wilburton Commercial Area (Study Area). Most of the Study Area is in the Wilburton/NE 8th Street Subarea Plan, but the area north of NE 8th Street and east of 116th Ave NE is part of the BelRed Subarea Plan, as shown in Exhibit 3.5-3.

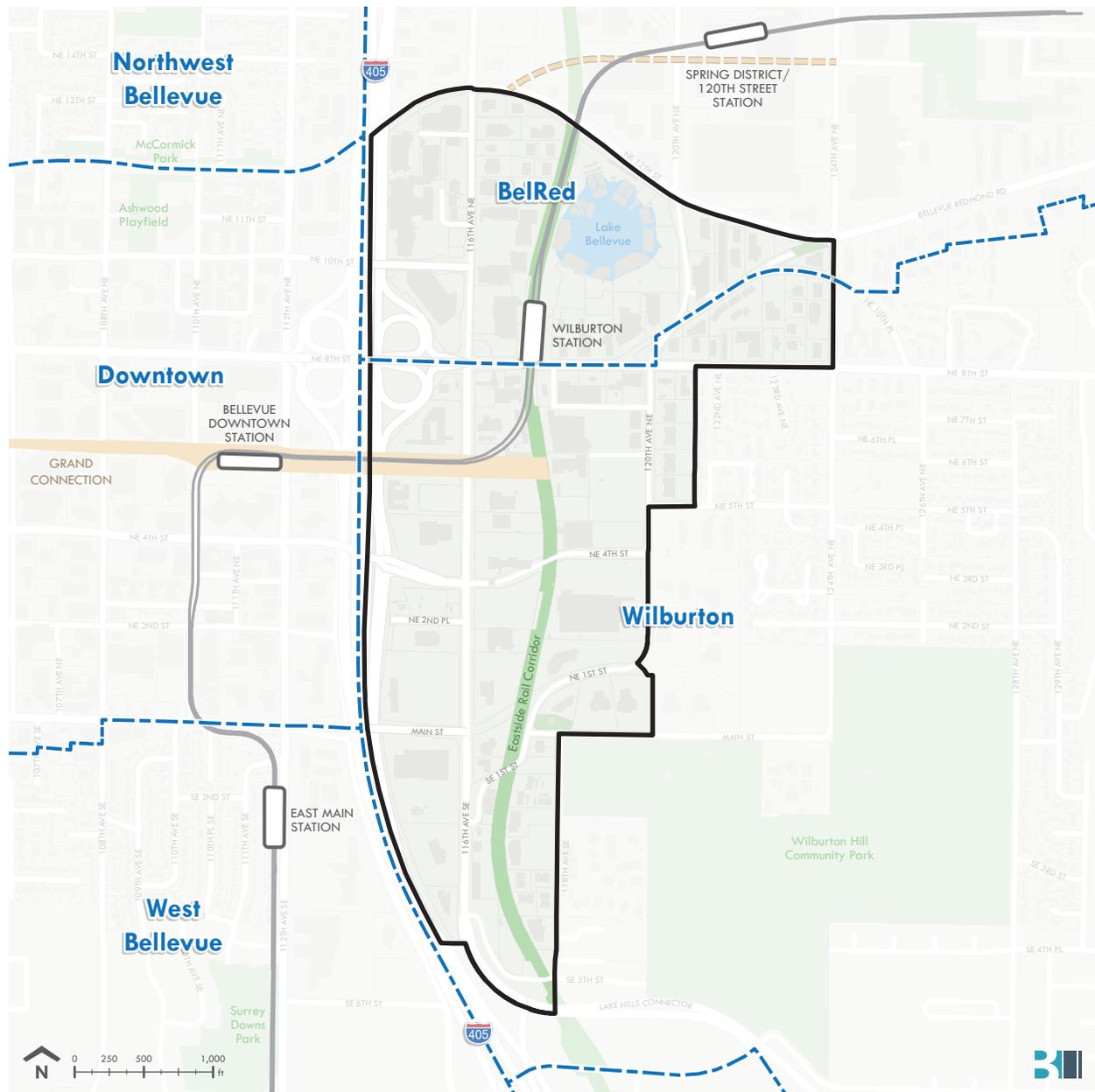


Exhibit 3.5-3 Subarea Plan Boundaries

Source: City of Bellevue, 2015

- Wilburton Study Area Boundary
- Neighborhood Areas
- Grand Connection
- East Link Light Rail Stations
- East Link Light Rail Route
- Spring Blvd—Under Construction
- Parks & Open Space
- Buildings



Goals of the Wilburton/NE 8th Street Subarea Plan include improving pedestrian accessibility and attractiveness of the commercial area, the provision of commercial and mixed-use development that complements Downtown and provides convenient shopping for adjacent neighborhoods, and protection of existing single-family areas and open spaces (outside of the Study Area of this EIS) from commercial encroachment. Policies enumerate zoning and development standards, including height limits. The BelRed Subarea Plan, applicable to the northern part of the Study Area, envisions nodal development with an emphasis on transit and pedestrian connections. It identifies a Medical Institution District node near the two hospitals.

Zoning in the Study Area implements the land use and subarea policies of the Comprehensive Plan. It includes a mix of primarily office and commercial zones, with only seven acres each of multifamily residential zoning (R-20 and R-30) and mixed-use zoning (BR-CR) as shown in Exhibit 3.5-4 and Exhibit 3.5-5.

- The General Commercial (GC) and BelRed General Commercial (BR-GC) zones allow a wide variety of businesses and support a mix of auto sales, large format retail, and small retail.
- Community Business (CB) is a retail and service district.
- The Medical Institution (MI) district and BelRed Medical Office (BR-MO-1) allow hospital and medical offices.
- The Professional Office (PO), Office (O), and Office Limited Business (OLB) allow for a variety of types of office uses. PO allows the lowest intensity offices, designed to be compatible with nearby residential. Office uses are oriented toward arterials or commercial areas but may serve as a buffer between residential and commercial areas. OLB is an office district that also allows hotels, eating establishments, and some retail sales.
- The Multifamily Residential zone (R-20 and R-30) allows attached dwellings at medium densities of 10-30 units an acre.
- BelRed Commercial Residential (BR-CR) is the only zone that encourages mixed-use development on individual sites and the district as a whole. This area is concentrated north of NE 8th Street.

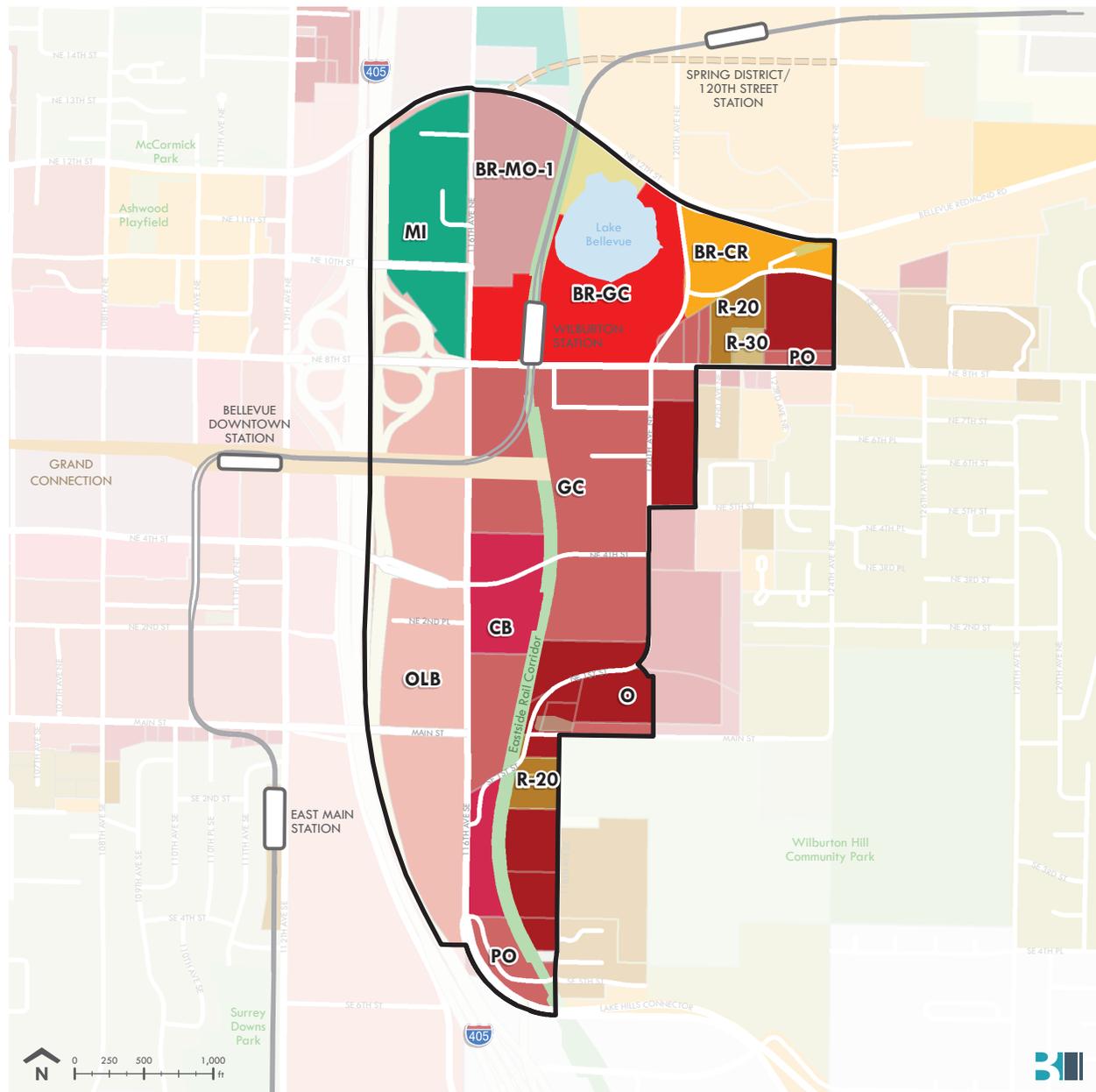


Exhibit 3.5-4 Current Zoning Within Study Area

Source: City of Bellevue, 2016





Exhibit 3.5-5 Current Zoning Within Study Area, in Acres

TYPE OF DISTRICT	TOTAL ACRES	PARCEL ACRES
Commercial/Mixed Use		
BR-CR	11	8
BR-GC	32	29
BR-MO-1	19	17
CB	17	13
GC	63	54
MI	21	19
O	34	30
OLB	71	38
PO	9	4
Subtotal	278	212
Residential		
BR-R	6.6	6
R-20	8	7
R-30	1	1
Subtotal	16	14
Total	294	225

Source: City of Bellevue, NBBJ, BERK, 2017

Exhibit 3.5-6 shows the maximum development standards for height, coverage, and density under current zoning. These standards give an idea of the intensity of current zoning. With the exception of the zoning for the hospital and other medical offices (MI and BR-MO-1 zones), allowed building heights range from about two to seven stories. The Study Area is already highly urbanized with a total hard surface coverage of approximately 81 percent per Section 3.3, and the zoning code provides standards that assume a similar percentages of total hard surfaces with new construction, though with a smaller percentage as impervious (e.g. pervious pavement may be used). Maximum coverage is 75 percent in the northeastern portion of the subarea where the BelRed zones are located, partly because planning for BelRed emphasized natural drainage techniques. Where residential development is allowed, it is limited to moderate intensities up to



Exhibit 3.5-6 Maximum Development Standards for Current Zoning

ZONE	MAX HEIGHT	MAX HARD SURFACE COVERAGE	MAX IMPERVIOUS SURFACES	ALTERNATIVE MAX IMPERVIOUS SURFACES ¹	MAX DWELLING UNITS PER ACRE	MAX FLOOR AREA RATIO
BR-CR	70'	75%	75%	75%	N/A	2.0
BR-GC	45'	75%	75%	75%	N/A	1.0
BR-MO-1	150'	75%	75%	75%	N/A	4.0
CB	75'	85%	65%	85%	30 ²	N/A
GC	30'	85%	65%	85%	N/A	N/A
O	30'	85%	60%	80%	20 ²	N/A
OLB	75'	85%	60%	80%	30 ²	N/A
PO	20'	85%	60%	80%	10 ²	N/A
R-20	40'	90%	65%	80%	20	N/A
R-30	40'	90%	65%	80%	30	N/A
MI	Subject to Master Planning					

¹ The impervious surface limits contained in the land use code may be modified pursuant to a critical areas report, so long as the critical areas report demonstrates that the effective impervious surface on the site does not exceed the limit established in LUC 20.20.010 and Chapter 20.25 LUC. Where a site already exceeds the allowed amount of impervious surface, the additional impervious surface shall not be approved unless an equal amount of existing impervious surface is removed such that the net amount of impervious surface is unchanged.

² Only for congregate care, assisted living, or senior living.

Source: Bellevue City Code, 2017

30 units per acre. Floor area ratios in the BelRed zones allow for midrise development, with the exception of the BR-MO-1 zone, which could allow tower development at 4.0 FAR and 150 feet maximum height.

CURRENT LAND USE PATTERNS IN THE STUDY AREA

Current uses in the Study Area have not fully implemented current plans and zoning that allow for greater building heights. Current uses include a variety of single-purpose commercial and office uses east of I-405 as shown in Exhibit 3.5-7 and Exhibit 3.5-8. Medical uses, including major facilities for Overlake Medical Center and Kaiser Permanente, dominate the northwest portion of the Study Area. Bellevue’s “auto row” includes a variety of car dealerships along both sides of 116th Avenue NE as well as NE 8th Street. Retail and restaurant uses are mostly located in the northern portion of


Exhibit 3.5-7 Existing Development Land Use Type

LAND USE TYPE	EXISTING DEVELOPMENT
Housing Square Feet	250,000
Housing Units	246
Office Square Feet	980,000
Retail/Commercial Square Feet	955,000
Hotel Square Feet	250,000
Hotel Rooms	452
Medical: Institutional & Office Square Feet	1,140,000
Industrial Square Feet	30,000
Total Square Feet	3,605,000

Note: Medical includes institutional and office space.

Source: Existing Space—City of Bellevue, 2017; Future Space—Leland Consulting Group, 2017

the area, but there is large format or “big box” retail located in the area where NE 4th Street was extended through to connect 116th Avenue NE and 120th Avenue NE. Office uses are scattered throughout the Study Area and include both individual office buildings and office parks. Three hotels are located in the area and a limited number of multifamily residential developments. A few parcels are considered industrial uses, such as the Mutual Materials site and Bellevue School District bus depot.

Building form tends to be suburban in character, consisting of low-rise or mid-rise buildings with surface parking, as shown in Exhibit 2-9. The Medical Institution District is an exception with office and hospital facilities as tall as 100 feet and structured parking.

The Study Area is bisected north to south by a former BNSF rail corridor (see Exhibit 3.5-8). King County is developing a master plan for this Eastside Rail Corridor (ERC), which runs from Renton to Woodinville and connects with other regional trails. The City of Bellevue and King County are working together on the master plan for the portion of the ERC within city limits, including the part within the Study Area boundary. At the time of this writing, there are no parks or recreation facilities in the Study Area. North of NE 4th Street the ERC is leased to Sound Transit and will be used as part of the Link Light Rail corridor to accommodate the aerial guideway.

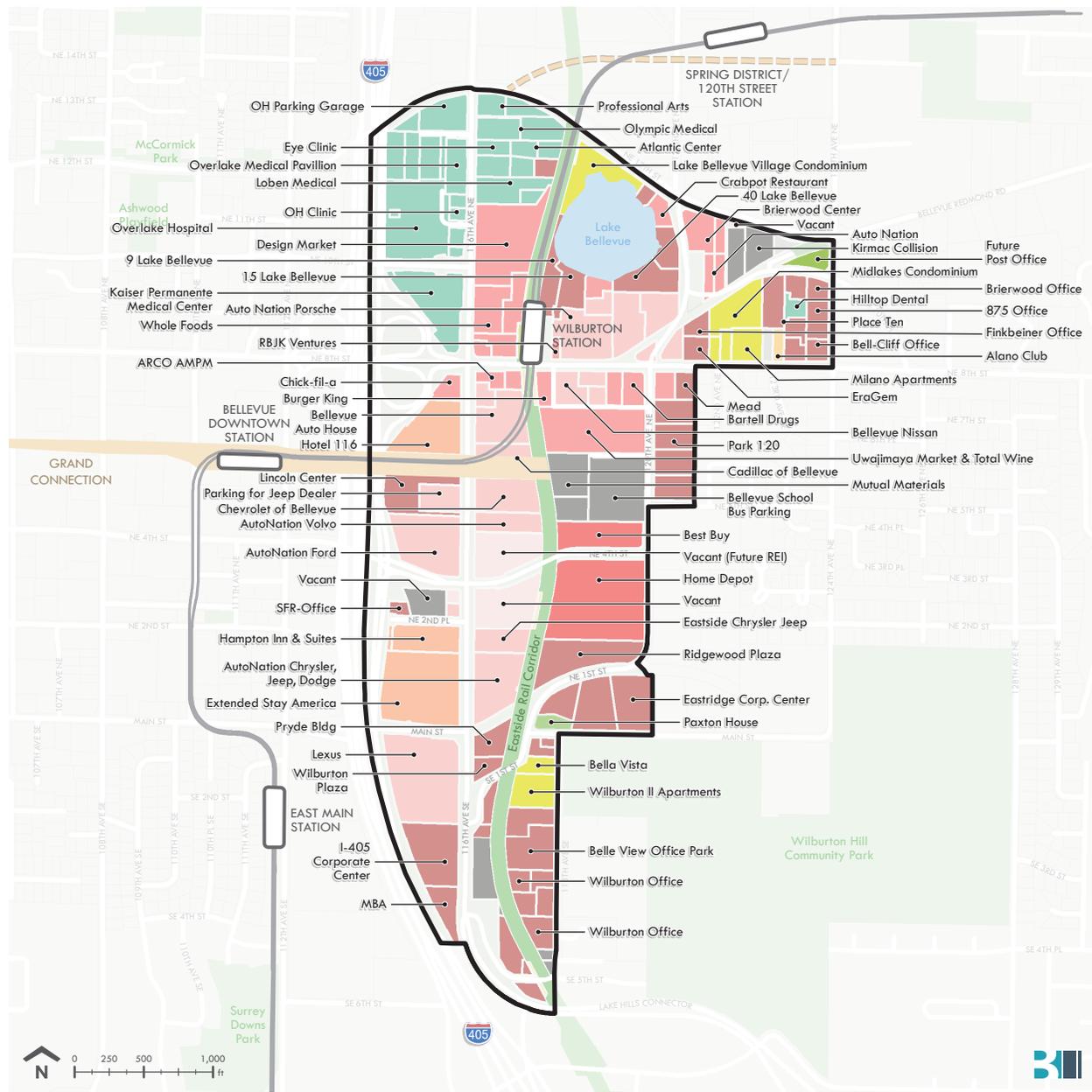
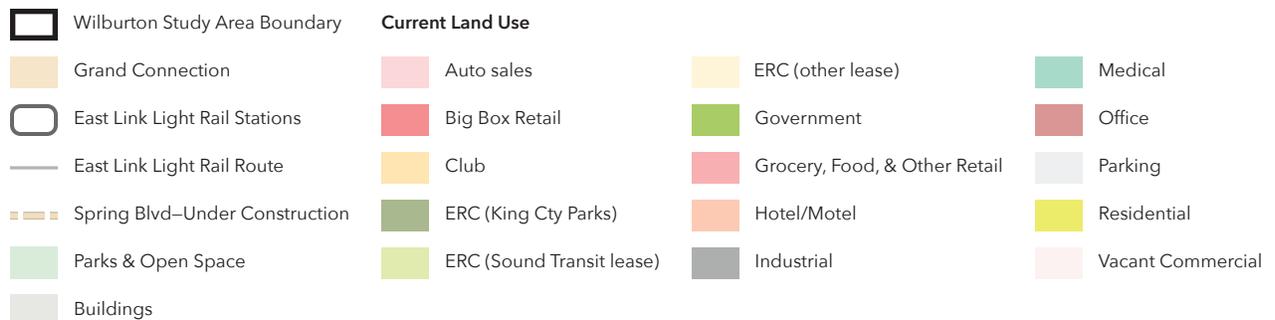


Exhibit 3.5-8 Current Land Use

Source: City of Bellevue, 2017



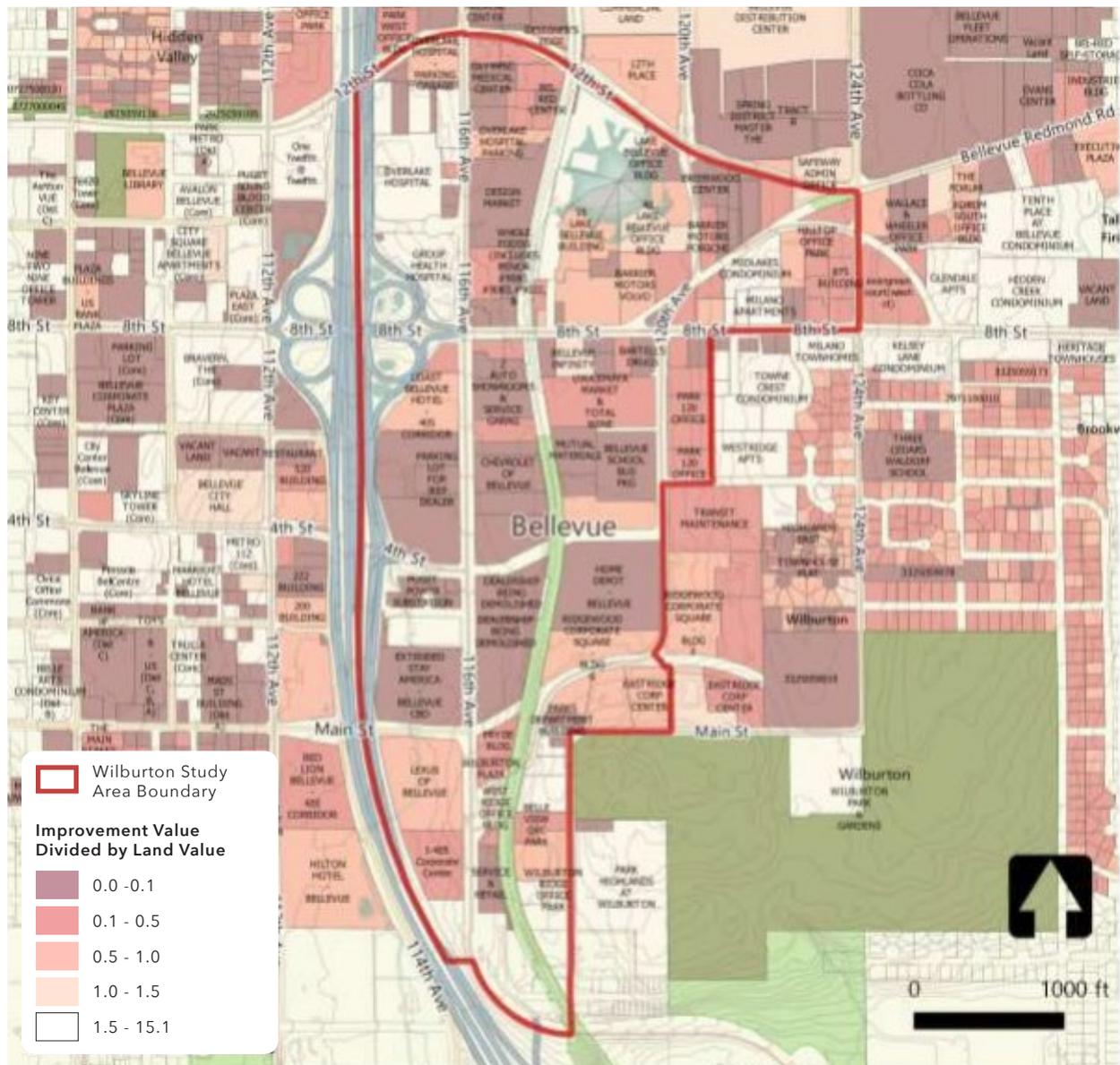


Exhibit 3.5-9 Redevelopment Potential of Properties within the Study Area

Source: Leland Consulting Group, 2017

Exhibit 3.5-9 shows an estimate of redevelopment potential within the Study Area based on a ratio of site improvements to land value provided by Leland Consulting Group. Properties are considered more likely to redevelop if they have a low ratio of improvement value to land value. The exhibit shows that there are a number of large parcels likely to redevelop in the Study Area.



Commercial Capacity



Residential Capacity

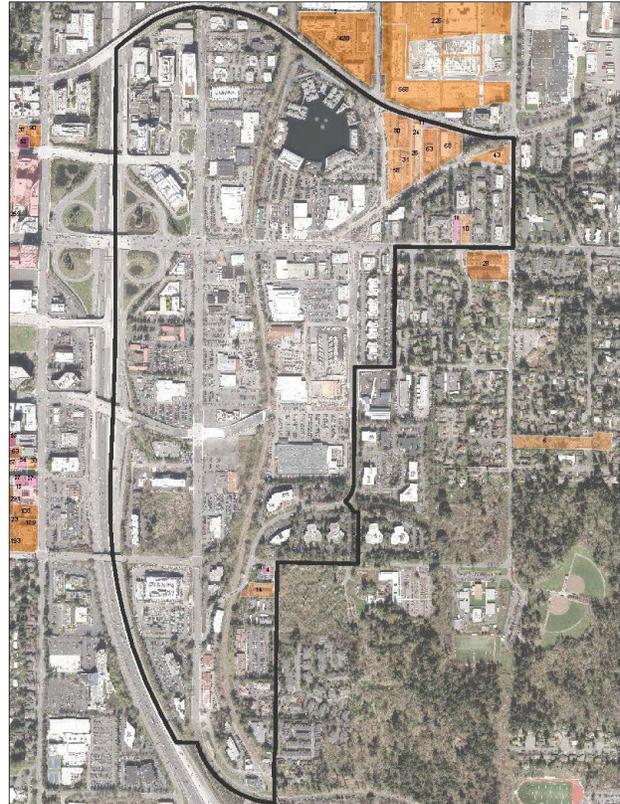


Exhibit 3.5-10 Bellevue Land Capacity Study–Redevelopable Properties

Source: City of Bellevue, 2017

The City of Bellevue land capacity results are illustrated in Exhibit 3.5-10 and are based on improvement to land value, consideration of market factors and critical areas, and other aspects.

While ultimately the entire Study Area is expected to redevelop, only a portion of development will take place within the 2035 planning horizon. Exhibit 2-15 and Exhibit 2-18 show parcels likely to redevelop under Alternatives 1 and 2 based on the Study Area redevelopable lands review and the City’s land capacity analysis.



CURRENT PLANS AND LAND USE PATTERNS ABUTTING THE STUDY AREA

Land uses abutting the Study Area, as shown in Exhibit 3.5-3, include:

- The BelRed Subarea Plan to the north. Adopted in 2009, the BelRed Subarea plan aims to create a nodal, mixed-use neighborhood oriented around the future light rail stations at 120th Ave NE and 130th Ave NE. Within BelRed, the Spring District is located immediately north of Wilburton. Planned uses for the Spring District includes over 1,000 housing units, the Global Innovation Exchange (a technology, research, and educational institution), REI corporate headquarters, and a variety of other office and retail uses. This area currently contains a mix of lower intensity, single-purpose office, retail, and industrial uses.
- East of the Wilburton Commercial Area is the residential portion of the Wilburton Subarea. This includes multifamily development immediately adjacent to the Study Area and single-family development further east. Some of this area is topographically separated by a hillside, including the land that contains the Bellevue Botanical Garden. At Main Street and 124th Ave NE the Bellevue School District will construct a new elementary school to serve Downtown, Wilburton, and BelRed.
- West of the Study Area lies I-405 and Downtown. Downtown is the most intensely developed part of Bellevue, with midrise and highrise development containing office, retail, residential, and mixed uses. Wilburton connects across I-405 at Main Street, NE 4th Street, NE 8th Street, NE 10th Street, and NE 12th Street. South of Downtown and just west of I-405 is a lower intensity mix of uses that are primarily office, hotel, and residential. The City is planning for transit-oriented development around the East Main Station that may increase density and development in that area.



3.5.3 IMPACTS

IMPACTS COMMON TO ALL ALTERNATIVES

Short-Term

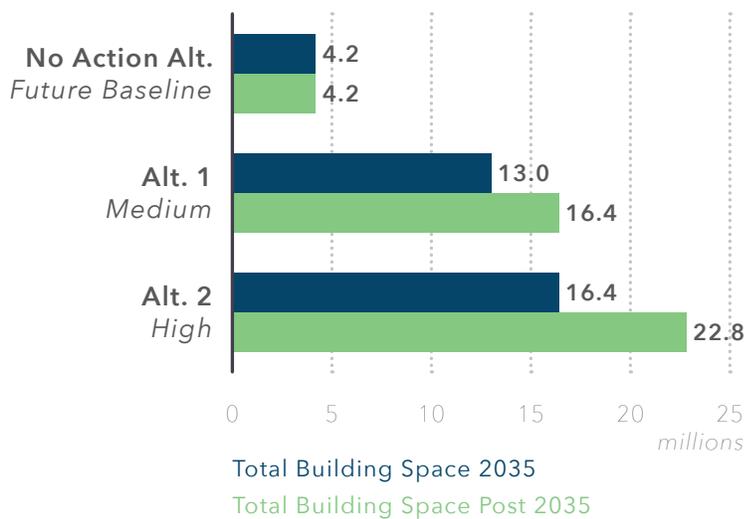
All alternatives include some amount of redevelopment. As redevelopment occurs within the Study Area, there is the potential for localized land use compatibility impacts to occur where newer development is of greater height and intensity than existing development. These compatibility impacts, if they occur, are temporary and will be resolved over time. The extent of these conflicts varies by alternative, and can be reduced by the application of existing or new development and design standards.

Long-Term

Land Use Plans and Policies

There are no common impacts to land use plans and policies. See each alternative for more information.

Land Use Within the Wilburton Commercial Area



New growth is expected to occur under all the alternatives, although the amount of growth and composition of the mix of land uses will vary by alternative. Activity levels would increase across the Study Area with new businesses, residents, and employees.

Exhibit 3.5-11 shows the projected growth in building space under each of the alternatives. Beyond 2035, it is anticipated that more extensive changes could occur to existing building forms, while in the near term to 2035, growth would be more focused on redevelopable sites.

Exhibit 3.5-11 Projected Growth During and Beyond 2035

Source: NBBJ, BERK, 2017

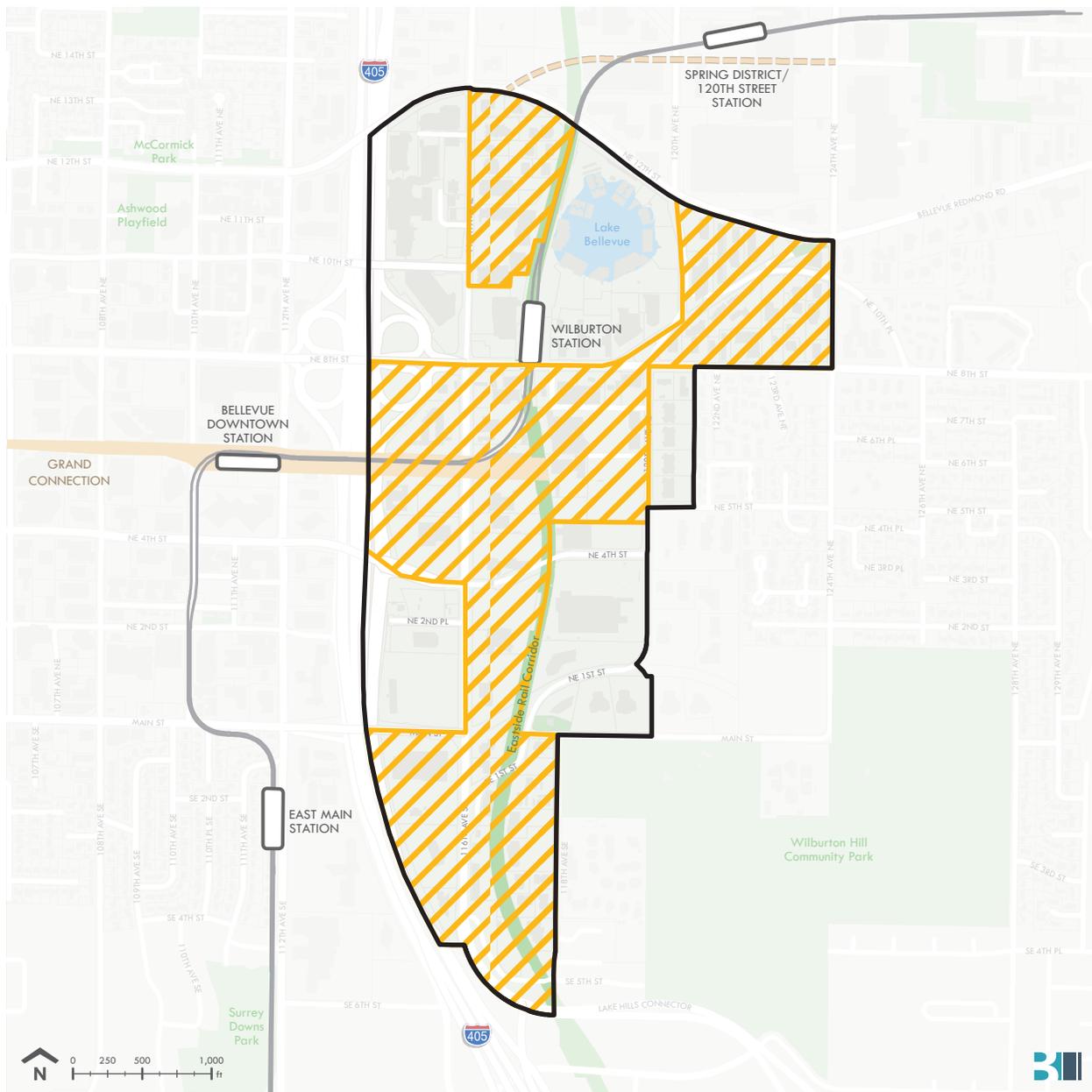


Exhibit 3.5-12 Blocks with Potential Growth Through 2035

Source: City of Bellevue, BERK, 2017

The location of growth through 2035 is anticipated to occur on redevelopable sites located within blocks illustrated on Exhibit 3.5-12.

- Wilburton Study Area Boundary
- Grand Connection
- East Link Light Rail Stations
- East Link Light Rail Route
- Spring Blvd—Under Construction
- Parks & Open Space
- Buildings
- Potential 2035 Growth Focus



Based on redevelopable potential on the blocks identified above, Exhibit 2-7 in Chapter 2 and Exhibit 3.5-13 below illustrate expected growth and land use mix by 2035. Under action alternatives, housing would have a greater share of building space in the future, and office space would increase substantially, compared to the No Action Alternative.

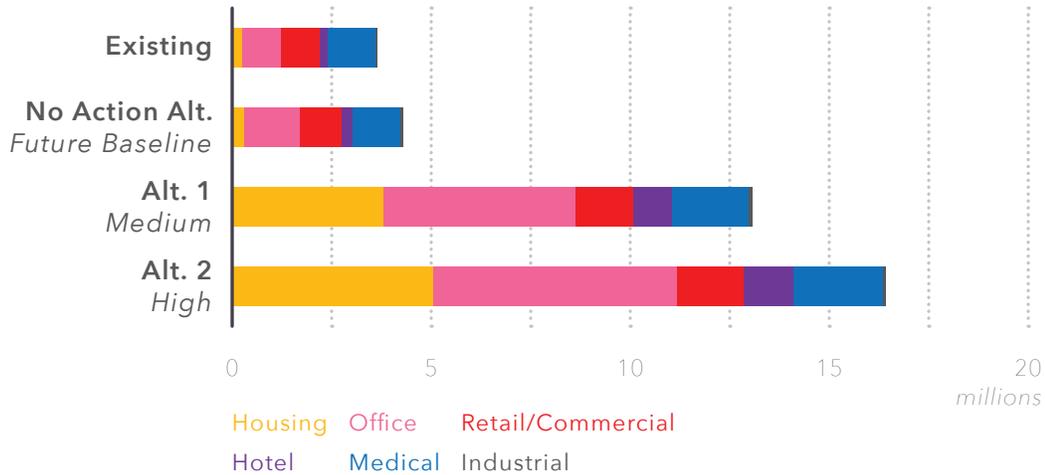


Exhibit 3.5-13 Projected Growth and Land Use Mix, 2035

Source: Existing Space—City of Bellevue, 2017; Future Space—Leland Consulting Group 2017; BERK, 2017

Land Use Surrounding the Study Area

Land use compatibility impacts are unlikely to occur to the north or west of the Study Area. In the north, the development of the Spring District in the BelRed Subarea is altering the land use pattern in that area, resulting in a greater mix of uses and more intensive land. Development of the Spring District will likely proceed ahead of redevelopment in the Study Area under any of the alternatives. To the west, I-405 is physical barrier between the Study Area and Downtown Bellevue. There are differences in impacts regarding development east and south among the alternatives and this is covered under individual alternatives below.

Changes in land use in the Study Area will be supported by high capacity transit, the development of the Eastside Rail Corridor, improvements to 116th Ave NE, and the Grand Connection. In general, these improvements provide important transportation resources to support the land use in all alternatives. Collectively these resources provide pedestrian, bicycle, and transit connections for future residents and employees to commute to and from and



circulate within the Study Area. The integration of transit and non-motorized travel modes minimizes the use of land for auto-related uses such as parking. The presence of people walking, biking, and waiting at transit stops adds activity to an area that supports a safe and vibrant environment. Additional information about the impacts of transportation in the Study Area can be found in Section 3.9.

Grand Connection

The Grand Connection connects the ERC to Lake Washington through Downtown Bellevue. The Wilburton terminus of the Grand Connection features a bridge over I-405 that is reserved for non-motorized travel. Development of the Grand Connection in the Study Area will be influenced by the engineering, plans, and construction for both the light rail line and the ERC. To the extent that the terminus, the route, and the fixed landing spots on both sides of I-405 can be determined as quickly as possible, it will provide the best opportunity to coordinate the Grand Connection into the light rail and ERC construction, as well as any future private development. Any coordination that can occur at the civil engineering step will prevent time delays and expenses associated with re-design and potentially re-construction. Knowledge of the Grand Connection route will also help to coordinate land use and nearby development to improve land use integration.

There are three options for the Wilburton portion of the Grand Connection that would occur under Alternatives 1 or 2; they would not be implemented under the No Action Alternative. The options range from a sculptural bridge that capitalizes on existing infrastructure assets, a signature stand-alone bridge, and the creation of a public space with a partial lidding of I-405 between NE 6th Street and NE 4th Street. The compatibility of each option with the land use alternatives is reviewed below.

Option A—Sculptural Bridge

Option A would construct an extension from NE 6th Street into the Study Area by creating a pedestrian crossing over I-405 and an elevated crossing over 116th Avenue NE to connect with the Eastside Rail Corridor. This option has a moderate likelihood of experiencing negative visual and sound impacts from the nearby freeway and light rail. As part of Alternatives 1 and 2, Option A would have the greatest impact effect on land use at the Lincoln Center site because of the conversion of that parcel into public



space that would limit its development for other land uses. Option A would provide a connection to Downtown, which in combination with other planned non-motorized and transit improvements will benefit the Study Area as described above.

Option B—Stand-alone Bridge

Option B would create a pedestrian bridge that stands apart from surrounding infrastructure. This bridge would be anchored to development on both sides of I-405 and would navigate between the interstate ramps. The width of the bridge could vary to create public space, green space, viewing platforms, or support vendors. The option is anticipated to incur the greatest amount of negative impacts from the visual and sound impacts of the nearby freeway. Option B could include or be integrated with a park or plaza on the City-owned Lincoln Center site and other properties. This option would have a moderate impact on land use as it would involve some conversion of the City-owned parcel into public space that would partially limit its development for other land uses. Option B could be directly integrated into future developments, which would provide a focal point for more intense development at both anchor points of the crossing.

Option C—I-405 Lid

Option C would cover I-405 with a “lid” over the existing interstate ramps between NE 4th Street and NE 6th Street to create a rolling terrain of about 200,000 square feet. This area could be used as a park or other public space and would connect with development on both sides of the interstate via the podiums of future development. Option C would require only a partial conversion of the northern most portion of the City-owned parcel at Lincoln Center for access to the street level of the Study Area and a modest stormwater facility. As a result, this option would have the least impacts on the development of other land uses on the Lincoln Center site.

Lidding I-405 presents the best opportunity to buffer and reduce the sights and sounds of I-405 and the best opportunity to create an iconic urban design. Option C provides the connection benefits of Option A, the land use integration and gateway benefits of Option B, and provides the benefit of creating public open space. The Grand Connection is not part of the No Action Alternative as current plans and regulations did not anticipate it. Active use of this space will be important to maintain a sense of safety and vibrancy.



Residential and commercial development at the levels projected in Alternatives 1 and 2 should provide a variety of users in the day, evening, and weekends to keep this amenity well used and attractive.

Public Space

Public spaces are an important component of land use planning. When well designed, activated, and located, they provide multiple benefits such as places for recreation, gathering spaces, access to nature, a visual break from surrounding development, and environmental benefits. Bellevue is considering five open space alternatives for the Wilburton Commercial Area that may be integrated into any of the alternatives, as shown in Exhibit 2-26. The open space alternatives are not mutually exclusive and could incorporate elements of several options. The No Action Alternative includes proposed policies from the Parks, Recreation, and Open Space (PROS) Plan that support a neighborhood park in Wilburton, but a location is not identified.

Public space options are more likely to be integrated as part of the Grand Connection or with a concept plan that can be integrated as part of redevelopment into Alternatives 1 and 2. The higher amount of development anticipated under Alternative 2 makes implementation of any of the parks and open space options more feasible because it increases the potential for private contributions toward the acquisition and construction of the facilities through impact fees, dedication of lands, and incentive programs. The compatibility of each public space option and the alternatives is described below.

Grand Connection Lid

The Grand Connection Lid could be an opportunity to create a significant open space amenity at a major gateway into the Study Area. The land use benefits and effects of the Grand Connection lid are discussed above. If the neighborhood open space identified in the PROS Plan were implemented in a format like the Lid, the No Action Alternative may not produce enough development to justify this option.

Under Alternatives 1 and 2, the Grand Connection Lid could be located in the vicinity of concentrated or nodal development near NE 6th Street. With good connections to Downtown, it could also draw residents and employee users from the west. This should



ensure that this open space is heavily used and stays active, safe, and vibrant. A larger space could also be programmed with activities and events to provide recreational and entertainment amenities and draw people to support nearby businesses. However, concentration of this space at the edge of the Study Area provides fewer benefits to Wilburton residents and workers located farther away.

Civic Center

The Civic Center option would put a large public space in the Study Area near NE 6th Street. The effects of the Civic Center option would be similar to those of the I-405 Lid . Unlike the Lid, which would create space over the I-405 freeway, the Civic Center would require the dedication of land that could be used for development, including City-owned land and the acquisition of additional property. Since the Civic Center option requires the acquisition of a concentration of property in one area, acquisition of the property for the Civic Center may present the greatest challenge. The Lid requires very little or no property acquisition and other options (Neighborhood Green, ERC Linear Park, Natural Network) included dispersed open space that could be more flexibly acquired and implemented.

The Civic Center option would be implemented in the core development area of either the Alternative 1 or Alternative 2. Land use in the core development area surrounding the Civic Center park could be more intensive than in the other options because a greater portion of the land area is devoted to open space. It may be easier to incentivize private participation in the creation and financing of the Civic Center option under Alternative 2 because more development is expected.

Neighborhood Green

In the Neighborhood Green option, there would be multiple, smaller public spaces spread throughout the Study Area. Such spaces could include public plazas, neighborhood parks, or other types of open spaces (such as the creek, wetland, or lake features shown in Natural Networks). Neighborhood Green presents the best opportunity for the integration of public spaces at a scale proportional to anticipated development in the different alternatives. This could be implemented through regulatory requirements or incentives written into the zoning code to support open space creation. Smaller spaces distributed throughout the area would provide easier access to



open space for the workers and residents of the area. It is less likely that there would be large public gatherings or events programmed in these smaller, distributed open spaces.

Under the No Action Alternative, development regulations, design guidelines, or amenity incentives may result in the creation of public open spaces in the OLB, MI, or BelRed zones. The potential dispersal of spaces would be limited by the underlying zoning (shown in Exhibit 2-12). With less overall development and more single uses, the usability of these spaces may depend on adjacent activities and uses. For example, a public plaza surrounded by primarily office uses may be well used during working hours on weekdays, but be less attractive to nearby residents on evenings and weekends if there is not enough activity there. It would also depend on the private market designing spaces that are functional and active in lieu of a City developed space. Under Alternative 1, projected growth and an emphasis on mixed uses would improve open space utilization, particularly for open spaces situated in or around the node. Alternative 2 is most likely to successfully implement this option due to higher levels of development and a greater distribution of mixed uses throughout the Study Area.

Eastside Rail Corridor Linear Park

This option would expand public space along the Eastside Rail Corridor and create nodes of activity along the Linear Park, including the area where it links to the Grand Connection. This would build off planned public assets, and development of this type of open space amenity would be less tied to redevelopment activity. Adjacent land use could be integrated with the Linear Park to provide enhanced amenities, particularly in Alternatives 1 and 2 where mixed use is emphasized. It is anticipated that land use adjacent to the Linear Park is likely to convert to new uses more quickly than it would under other options. Alternative 1 projects mixed use on both sides of the ERC, which would provide the best opportunity for land use integration. Residents and workers in the eastern half of the Study Area or in the vicinity of the Grand Connection would have the best access to this open space. If good non-motorized connections are created from redevelopment areas on the western side of the Study Area, access to the Linear Park should be safe and convenient for all desired users. The Linear Park is the most likely option to attract non-local users, as the ERC will attract users from outside the Study Area. This is likely to ensure a safe and active environment that can be sustained the action land



use alternatives. Without design guidelines, such as the No Action Alternative, future uses will not create frontage or interaction with the Eastside Rail Corridor, missing an opportunity to create a highly utilized and active open and public space.

Natural Network

The Natural Network option would result in multiple, smaller public spaces spread throughout Wilburton in areas where it is possible to enhance, expose, and utilize the natural features of the area such as Lake Bellevue, Main Street wetland, and Sturtevant Creek. Access and usability of these spaces may depend on their locations in relationship to surrounding development as well as the level of improvements to ensure public accessibility, similar to Neighborhood Green. Under the No Action Alternative, existing BelRed development regulations require the enhancement of the natural network in the north end of the Study Area. It is very likely that regulations developed to support Alternatives 1 and 2 would include similar provisions for the entire Study Area. Since the natural features are in fixed locations, they may be near, but not integrated with, redevelopment areas. Further, the City would require compliance with the critical areas ordinance, but could incentivize enhancement of existing natural systems with policies and code amendments. Due to private ownership and the likelihood of redevelopment, development of parts of the Natural Network may lag behind adjacent redevelopment creating a lack of continuity, unless implemented through a public program. To the extent that an amenity incentive system developed as part of Alternatives 1 and 2 would include development of the Natural Network (through offsite development of the resource or a fee-in-lieu system), private development may be able to fund this option. In such a case Alternative 2 is more likely to generate voluntary contributions to the Natural Network because it projects the greatest amount of new development.



PERFORMANCE MEASURES EVALUATION

As described in the Introduction, there are seven performance standards for Land Use, shown in Exhibit 3.5-14 along with a summary of how each alternative performs. Following the Exhibit is an explanation of each standard.

Exhibit 3.5-14 Evaluation Framework: Comparison of Alternatives—Land Use

PERFORMANCE MEASURE	NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2
Character, intensity, and extent of transit-oriented mixed-use development around Wilburton station	●	▲	▲
Addressing the eastern terminus of the Grand Connection and station area planning	●	▲	▲
Density of community gathering spaces and increase in usable public space	▼	●	▲
Amount and location of open spaces and parks, including goals identified in the park and recreation system plan, e.g. neighborhood park	▼	●	▲
Height of development, location of roads, and landscaping abutting surrounding neighborhoods creating an appropriate transition to areas of greater or lower density	▼	▲	▲
	Downtown & BelRed ▲ Residential	Downtown & BelRed ● Residential	Downtown & BelRed ▼ Residential
Concentration of development and activity at perimeter of neighborhoods creating an appropriate transition to areas of greater or lower activity	Same as above	Same as above	Same as above
Amount of growth on sites likely to develop and needed capital facilities. Potential for near-term and mid-term implementation.	▼	●	▲

▲ Strong Emphasis ● Moderate Emphasis ▼ Weak Emphasis

Character, Intensity, and Extent of Transit-oriented Mixed-use Development Around Wilburton Station

Since there are potentially redevelopable parcels in the vicinity of Wilburton station in the No Action Alternative, it provides an opportunity for transit-oriented mixed use that will be attractive to developers under the current zoning. However, the character, intensity, and extent of transit-oriented development would be increased in Alternative 1 where a development node is planned in the vicinity of the station and in Alternative 2 where there is an even greater concentration of development expected in that area. Future zoning will reinforce development there by allowing greater

Performance Measure



intensity of development and promoting design standards that make this area usable and livable.

Performance Measure

Addressing the Eastern Terminus of the Grand Connection and Station Area Planning

Future zoning, development regulations, and design guidelines in Alternatives 1 and 2 are likely to address the eastern terminus of the Grand Connection. Existing regulations under the No Action Alternative do not address the Grand Connection, but it is in the interest of new development in that vicinity to do so. As a result, there is likely to be some emphasis on addressing the Grand Connection in the No Action Alternative.

Performance Measures

Density of Community Gathering Spaces and Increase in Usable Public Space *and* Amount and Location of Open Spaces and Parks

Performance measures related to the amount, location, and usability of parks, open spaces, and public gathering spaces are likely to vary among alternatives. Under the No Action Alternative, existing regulations only require or incentivize some of these types of spaces in some portions of the Study Area. Development of new spaces is dependent upon redevelopment. With the lowest projected amount of future development, the emphasis on parks, open spaces, and public gathering spaces is weak. Under Alternatives 1 and 2, new development regulations will be written to require and incentivize the creation of parks, open spaces, and public gathering spaces throughout the Study Area in accordance with one or more of the options in Exhibit 2-26. This will put a greater emphasis on the creation on these spaces. Since Alternative 2 has the highest amount of projected development, implementation is most likely because there are greater opportunities to finance parks, open spaces, and public gathering spaces.

Performance Measures

Height of Development, Location of Roads, and Landscaping Abutting Surrounding Neighborhoods *and* Concentration of Development and Activity at Perimeter of Neighborhoods

Under all alternatives, the most likely areas for redevelopment are centrally located between the Eastside Rail Corridor and I-405



along 116th Avenue NE. This means that none of the alternatives have a strong emphasis on development at the perimeter of the Study Area. The No Action Alternative has the least development intensity in general and the lowest allowed heights, so it would have less potential incompatibility with nearby neighborhoods. Alternative 1 concentrates development around a central node but does increase heights along the boundary of the Study Area next to the abutting neighborhood; there would be a moderate potential for incompatibility along the Study Area perimeter. However, future zoning would allow increased intensity in those areas, providing a moderate emphasis on height, new roads, and landscaping there.

Although Alternatives 1 and 2 both step down in intensity at the perimeter of the Study Area, Alternative 2 allows for the greatest intensity at the perimeter of all the Alternatives. Although new development is likely to be taller in all alternatives, Alternative 2 would allow the greatest height and activity of the three alternatives at the perimeter, particularly along NE 8th Street.

Amount of Growth on Sites Likely to Develop and Needed Capital Facilities. Potential for Near-term and Mid-term Implementation

Performance Measure

The amount of growth on sites likely to redevelop, the provision of necessary capital facilities, and the potential for implementation will vary depending on the amount of development projected under each alternative. The No Action Alternative will have the lowest emphasis, Alternative 1 a moderate emphasis, and Alternative 2 will have the strongest emphasis.

IMPACTS OF THE NO ACTION ALTERNATIVE

Short-term Impacts

There are no likely short-term impacts related to land use plans, policies, patterns, or compatibility.

Land Use Plans and Policies

The No Action Alternative would not amend current plans or regulations to reflect changed conditions with the Wilburton light rail station or the ERC. These two investments can help provide amenities and incentives to achieve the mixed-use development



desired in the Wilburton Subarea Plan policies. While addressed in policies, the desired mixed-use development pattern would require new development regulations to create the character and intensity of development suited to high capacity transit, pedestrian, and bicycle modes, and associated open space.

Current parks plans indicate a desire for a neighborhood park, but otherwise do not address the Grand Connection or Open Space initiatives.

Land Use Patterns Within the Wilburton Commercial Area

The No Action Alternative is the least intensive land use alternative. It applies future growth to existing conditions using the policies and zoning that are in place today. As a result, future land use under the No Action Alternative is consistent with Bellevue's current Comprehensive Plan, Future Land Use Map (Exhibit 3.5-1), subarea plans (Exhibit 3.5-3), zoning (Exhibit 3.5-4 and Exhibit 3.5-5) and development regulations (Exhibit 3.5-6).

Under the No Action Alternative, the Study Area would support 335 total housing units and 4,230,636 total square feet of development, as shown in Exhibit 2-10.

All land use categories are expected to grow, with the exception of industrial uses. As the area grows, the mix of land uses under the No Action Alternative will remain similar to the existing conditions. Increased flow of traffic, whether transit-oriented, auto-oriented, or non-motorized could increase the likelihood of the redevelopment of land uses in a few areas. There is likely to be some redevelopment in the vicinity of the light rail station, but concentrated transit-oriented development is not anticipated. The extension of NE 6th Street to 120th Avenue NE will create a stronger connection between the Study Area and Downtown, which could lead to increased likelihood of redevelopment on this corridor. The same could be true near NE 4th Street where an at-grade, signalized crossing of the Eastside Rail Corridor is planned.

A comparison of Exhibit 2-9 and Exhibit 2-10 show that building forms would also remain similar to the forms that exist today. Redevelopment of some areas may result in larger buildings where new construction maximizes development on parcels that are currently underutilized according to existing zoning, particularly in



areas already planned in the BelRed Subarea Plan. This is most likely to occur for medical related uses or near the light rail station in the northern end of the Study Area, or where redevelopment occurs on lots formerly used for auto sales.

With a mix of land uses and building form similar to existing conditions, there are unlikely to be issues with land use incompatibility within the subarea.

Land Use Patterns Abutting the Study Area

With heights of 35 to 55 feet abutting the area adjacent to the east and the application of current Land Use Code standards that address landscaping and other site design requirements, there are unlikely to be compatibility impacts.

IMPACTS OF ALTERNATIVE 1

Land Use Plans and Policies

The Comprehensive Plan acknowledges Wilburton as a future mixed-use center, and Alternative 1 is consistent with policy language in the Land Use Element that prioritize mixed-use centers as areas that will receive the majority of Bellevue's growth. However, there is an inconsistency with Figure LU-3 (Projected Housing Growth), which specifically distributes growth to the Downtown, BelRed, and Eastgate/Factoria centers. The remainder of the city, which includes the Study Area, is assigned six percent of the city's 20-year housing growth (about 900 units). This figure would need to be updated to include Wilburton as a mixed-use center.

Subarea plan policies are generally consistent with Alternative 1. Policies in the BelRed and Wilburton/NE 8th Street Subarea Plans support redevelopment in the Medical Institution District. The BelRed Plan specifically allows for heights up to 150 feet in this area. Exhibit 2-13 shows that the projected building form in this area to be at about the same level of intensity, but Alternative 1 adds up to 813,300 square feet of new medical development. Policies in the Wilburton/NE 8th Street Subarea Plan generally support the conversion of the commercial area into a more mixed-use environment, which is also generally consistent with Alternative 1.



Since land use designations and zoning have not been fully defined at this stage of planning for Alternative 1, a direct comparison of current and proposed plans and codes is not possible. However, Alternative 1 projects building form using a transect analysis shown in Exhibit 2-13 and Exhibit 2-14, which gives a general sense of future building height and intensity. Both the current Wilburton and BelRed Subarea Plans specify land use designations, zoning, and heights which are not fully consistent with the heights and intensities shown under Alternative 1 transects. Policy S-WI-4 in the Wilburton/NE 8th Street Subarea Plan, for example, limits building height to 75 feet in the areas between I-405 and the BNSF corridor, south of NE 8th Street. Alternative 1 proposes building forms with heights up to 250 feet in this area. However, Policy S-WI-4 also acknowledges that height may be increased if the area is rezoned for more intense uses consistent with a future subarea plan amendment. Updates to the Subarea Plans would be needed to ensure policy consistency with Alternative 1.

Land Use Patterns Within Wilburton Commercial Area

Alternative 1 is the medium-growth alternative, but it accounts for a major change in land use from the existing condition. Under Alternative 1 it is estimated there will be up to 3,946 total housing units and over 13 million square feet of total development in the Study Area, as shown in Exhibit 3.5-11.

Building heights are likely to increase from a range of about 20 to 75 feet (with up to 200 feet in the Medical Institution District) under existing conditions and the No Action Alternative to a range of about 35 to 250 feet to accommodate additional growth and development, as shown in Exhibit 2-13. Given the acreages shown in Exhibit 2-14, most buildings will be under 160 feet in height, with the greatest potential for height above 160 feet in the node around the light rail line.

A change in land use patterns under Alternative 1 is expected to significantly increase activity in the Study Area. At full buildout, there could be up to 16.3 million square feet of total building space in a form shown in Exhibit 2-15.

Based on the potential for redevelopable land and the City's 2035 planning period, Alternative 1 assumes phased growth of about 9.4



million square feet of new development and a total of 13.1 million square feet of total development.

At 3.8 million square feet of building space, housing would account for nearly 30 percent of the total projected development under Alternative 1. Under existing conditions and the No Action Alternative, housing comprises only about seven percent of the total development area. The increase in housing units is likely to bring additional weekend and evening activity into the Study Area.

Office space would continue to comprise about half of the projected total development, with about 30 percent of the office development associated with the Medical Institution District. Approximately 4.8 million square feet of commercial office uses would make up the bulk of the non-residential development under Alternative 1, exclusive of medical office.

Office and residential development would create demand for retail and restaurant space. Commercial/retail space will grow by over half a million square feet, but proportionally it will only represent about one-tenth of the development in the Study Area.

New development and additional activity is likely to be distributed in the Study Area as shown in Exhibit 3.5-13 within the 2035 planning period. Greater mixed use and intense building space would be possible beyond 2035 as shown in Exhibit 3.5-11.

Under Alternative 1, mixed-use development is much more likely than under the No Action Alternative or existing conditions. Office, housing, and hotel uses are much more likely to include ground floor retail uses, particularly along NE 6th Street in proximity to the light rail station, where the greatest intensity of building form is planned. This alternative supports a transit-oriented development node around the light rail station.

Land Use Patterns Abutting the Study Area

Compatibility conflicts could occur due to changes in the mix of land use and changes related to the increased intensity and height of new development. Building height increases on the eastern side of the Study Area, south of NE 6th Street and along NE 8th Street, could place future buildings of 70-160 feet on the boundary of the Study Area. Development just outside the Study Area boundary is primarily office and commercial development that is less sensitive to impacts. There is a significant grade change that buffers some



of the residential development further to the east where proposed building heights would be 70-100 feet. Within the Study Area there is also the potential for temporary land use conflicts, particularly in early redevelopment phases where new areas of greater height and intensity abut areas of existing development. However, careful attention in the creation of zoning, development regulations, and design standards could limit potential for land use compatibility conflicts both within the Study Area and in adjacent areas.

IMPACTS OF ALTERNATIVE 2

Land Use Plans and Policies

Like Alternative 1, Alternative 2 is consistent with the Comprehensive Plan and subarea plan policies that designate Wilburton as a mixed-use center and recognize potential growth of the Medical Institution District. The amount of growth projected in Alternative 2 is also inconsistent with Figure LU-3 of the Comprehensive Plan which does not assign housing growth specifically to Wilburton. It is also inconsistent with policies, land use designations, zoning, and heights specified in the current Subarea Plans. The subarea plans would need to be updated under Alternative 2 to ensure policy consistency.

Land Use Patterns Within the Study Area

Alternative 2 presents the highest growth alternative. Land use is mixed in the same proportions as Alternative 1, but with 35% more new development in each land use category as shown in Exhibit 3.5-11.

Under Alternative 2 there is anticipated to be a total of 5,246 housing units and over 16 million square feet of development by 2035. Development up to 22.8 million square feet of building space could occur during and after 2035.

Building heights may reach as high as 450 feet under Alternative 2, but only in a concentrated transit-oriented development area around NE 6th Street west of 116th Ave NE (Exhibit 2-16). The vast majority of development is expected to develop at a height of 120-250 feet based on the acreage shown in Exhibit 2-17.



Although the mix of land use is about the same as Alternative 1, it is distributed a little differently in Alternative 2, as shown in Exhibit 2-18 and Exhibit 3.5-13.

Alternative 2 would have a concentration of transit-oriented development near the light rail line, but higher levels of development are expected throughout the Study Area. Mixed uses with ground floor retail are more likely to occur throughout the Study Area, but with the most intensity along 116th Ave NE. Activity levels in the Study Area are projected to be significantly higher than under existing conditions or in the No Action Alternative, and at least 35 percent higher than Alternative 1.

Land Use Patterns Abutting the Study Area

Compatibility conflicts could occur due to changes in the mix of land use and changes related to the increased intensity and height of new development. Building height increases on the eastern side of the Study Area, south of NE 6th Street and along NE 8th Street, could place future buildings of 120-250 feet on the boundary of the Study Area. Even though adjacent development tends to be in commercial or office use, new development would be significantly different. Within the Study Area there is also the greatest potential for temporary land use conflicts under Alternative 2, particularly in early redevelopment phases, where new areas of greater height and intensity abut areas of existing development. However, careful attention in the creation of zoning, development regulations, and design standards could limit potential land use compatibility conflicts both within the Study Area and in adjacent areas.

3.5.4 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The Bellevue Comprehensive Plan designates the Wilburton Commercial Area as one of the city's mixed-use centers. The Comprehensive Plan, including the Wilburton/NE 8th Subarea Plan, includes policies and plans for improvements to support the development of the land use under the No Action Alternative.

Increases in land use intensity under Alternatives 1 and 2 could be partially mitigated through the development of the Grand



Connection, Eastside Rail Corridor, and other public park and open spaces. These features include non-motorized transportation connections that support new development. The integration of public open space into the Study Area (regardless of the options chosen) helps to soften potential impacts of more intensive land use. Open space is an amenity that can be used for recreation, community gathering, access to nature, a visual break, and a variety of environmental benefits.

REGULATIONS AND COMMITMENTS

Bellevue's City Code contains regulations that help to ensure land use compatibility. A summary of these regulations, which would mitigate impacts associated with the alternatives, is presented below.

SEPA Review. Section 22.02 of the Bellevue City Code contains environmental procedures that govern the issues to be addressed during development review under the State Environmental Policy Act (SEPA). SEPA specifically addresses issues related to height, bulk, scale, and land use compatibility. Future site-specific development would be subject to additional SEPA review.

Development Regulations. Title 20 contains Bellevue's Land Use Code, which establishes zoning and development regulations. These development regulations contain provisions governing the design of buildings, site planning, and provisions to minimize land use incompatibilities. Commercial and mixed-use zones generally contain provisions relating to building form and design, such as standards related to height, bulk, scale, density, setbacks, FAR, screening, floor plate size, landscaping, etc. Regulations are in place to address such issues related to the implementation of the No Action Alternative.

Design Standards. Currently there are no design standards specific to the Wilburton Commercial Area. However, there are a number of existing design standards that are applied to certain parts of the Study Area including:

- **Transition Area Design District (20.25B)** which addresses height, setbacks, landscaping buffers, screening, and signage of commercial and office buildings adjacent to residential zones, including the R-20 and R-30 zones which are in the Study Area.



- **Office Limited Business zone (20.25C)** provides minimum building and landscaping design standards for new development.
- **Community Retail Design District (20.25I)** provides minimum standards for building design, site design, internal walkways, and screening for retail development outside of Downtown.
- **Medical Institution District (20.25J)** identifies appropriate uses, dimensional requirements, landscaping requirements, streetscape design, site design, and building design for master plans within the Medical Institution District area.
- **Light Rail Overlay District (20.25M)** provides rules and procedures for Sound Transit's development of light rail facilities.

This patchwork of standards works to promote land use compatibility in the areas in which they are applied. These rules would be in place under the No Action Alternative.

OTHER PROPOSED MITIGATION MEASURES

Land Use Plan Consistency

Mixed-use centers are intended to take the majority of the city's projected housing and employment growth. Minor changes to the Comprehensive Plan, such as the update of figure LU-3, would be incorporated into the implementation of Alternatives 1 and 2 to ensure full consistency between the Comprehensive Plan and the Study Area policies and zoning. Similarly, zoning and development regulation changes associated with Alternatives 1 and 2 may require updates to the Wilburton/ NE 8th Street and BelRed Subarea Plans to ensure consistency.

Design Standards

Alternatives 1 and 2 would require the development of new or revised zoning and development regulations for the Study Area. It is anticipated that the zoning associated with these alternatives is likely to be similar to rules established for the BelRed area in part 20.25D of the Land Use Code. New regulations will need to address permitted uses, dimensional requirements, an FAR amenity incentive system, the conversion of non-conforming uses



and properties, parking and circulation, landscaping, and the development of streets and sidewalks. These regulations will need to be crafted with the intent of creating land use compatibility within and adjacent to the Study Area.

- Alternatives 1 and 2 will include the adoption of design standards specific to the Study Area, just as there are design standards specific to Downtown and to BelRed. It is anticipated that design regulations developed to implement Alternatives 1 or 2 would include standards related to: integration of the natural environment, building design, enhancement of gateway features, low-impact development surface water features, public art, pedestrian experience and streetscapes, public spaces, mixed-use building features, site planning, parking, lighting, screening, and signage.

3.5.5 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Under all alternatives, additional growth and development will occur in the Study Area, leading to increases in height and bulk of buildings and increased land use intensity. This transition is unavoidable but is not considered significant or adverse within an urban area designated as a mixed-use center in the Comprehensive Plan.

Future growth is likely to create temporary or localized land use compatibility issues as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives. However, with existing and new development regulations, zoning requirements, and design guidelines, no significant adverse impacts are anticipated.

Alternatives 1 and 2 are generally consistent with the policy direction of the Comprehensive Plan and the Wilburton/NE 8th Street Subarea Plan. However, updates to some policies and maps in both the Comprehensive Plan and the Subarea Plan will be needed under the Action Alternatives to ensure full consistency. A list of these potential updates can be found in Appendix C.