



# MEMORANDUM

DATE: October 6, 2010

TO: Chair Ferris  
Bellevue Planning Commission

FROM: Nicholas Matz AICP, Senior Planner 452-5371  
[nmatz@bellevuewa.gov](mailto:nmatz@bellevuewa.gov)

SUBJECT: Public Hearings for 2010 Annual Comprehensive Plan Amendment (CPA)  
10-120231 AC

On October 13, 2010, the Planning Commission will hold a public hearing and be asked to make recommendations on the 2010 Transportation-related Comprehensive Plan Amendment:

- Amend the Comprehensive Plan with transportation-related updates of existing policy and project lists in Transportation Element figures, Bel-Red Subarea Plan, and Transportation Facility Plan (TFP) project descriptions, to keep the Plan consistent with the GMA at RCW 36.70A.070 (6) for transportation elements.

The CPA is summarized here:

- Amend the Transportation Element to **adopt a new Figure TR.2** for Travel Demand Forecasts;
- Amend the East Bellevue Transportation Facility Plan (TFP) by **adding an updated project list description at #583** for 120<sup>th</sup> Avenue NE improvements and renumbering the balance of the TFP project list;
- Amend the Bel-Red Subarea Plan by **adding an updated project list description at #109** for Bel-Red Road between NE 20<sup>th</sup> and NE 24<sup>th</sup> Street and renumbering the balance of the project list, and eliminate current project descriptions for that road from the three other Comp Plan TFPs;
- Amend the Transportation Element to amend **Figure TR.3** with an **updated designation of NE 10<sup>th</sup> Street** between 112<sup>th</sup> and 116<sup>th</sup> Avenues NE as Minor Arterial.

The September 23, 2010, staff report is attached to this memo.

## PUBLIC COMMENT

The Transportation Commission reviewed the proposal in their September 8, 2010, study session. Commissioners concurred with the staff proposal for all four of the amendment proposals.

The Best Buy Stores LP, representing their store at 457 120<sup>th</sup> Avenue NE, submitted comments on the proposal to update 120<sup>th</sup> Avenue NE improvements. These are discussed in the staff report in Section VI—Public Notice and Comment.

No other public comments have been submitted to date.

## **STAFF RECOMMENDATION**

As detailed in the September 23 staff report, these proposals satisfy the decision criteria for a Comprehensive Plan Amendment. In consideration of the analysis in the staff report and public comment, staff recommends **APPROVAL** of the proposed Comprehensive Plan Amendment including each of the four proposals.

At the September 15, 2010 Planning Commission study session commissioners requested information on several issues.

Commissioner Sheffels asked, relative to the update of Figure TR.2, how the city's travel demand forecast model actually performed, compared to the original 1992 forecast for the period to the year 2005.

Transportation modeling staff ran the numbers. The results were that some Mobility Management Areas (MMAs) had less actual trips than were forecasted, and some had actual trips that exceeded forecasted travel demand. Overall, however, for all MMAs the 2005 actual travel was 103% of forecasted travel demand for "beginning trips" (trips that started in a particular MMA) and 109% of forecasted demand for "end trips".

The modeling staff noted other factors affecting forecasting performance included refinements to the forecasting approach over the years, and the influence of demographic information from the 2000 Census on trip generation rates updates.

Chair Ferris asked the staff report and recommendation to address how the proposals serve the City's vision both for multi-modal transportation policy and to satisfy travel demand. The staff report's Section III—Background addresses this, including a framework discussion to anchor the proposals in these larger policy contexts. The staff report also makes specific reference to the influence of the Comprehensive Plan's *Vision* and *Implementation* chapters when responding to the CPA decision criteria.

Commissioner Himebaugh asked for the staff report to address the public comment letter submitted by Best Buy LP. The staff report at Section VI—Public Notice and Comment identifies the essential issue raised in the letter of connected project planning. The report also quantifies how the 120<sup>th</sup> Avenue NE proposal addresses that as well as sets out context for the sequencing of corridor improvements.

## **PLANNING COMMISSION ACTION**

We request that you conduct and close a separate public hearing for each of the proposals, discuss them, ask questions of staff, and reach a recommendation for each of the proposals.

Separate public hearings for each proposal will ensure a clear record that any person interested in speaking to any one of the proposals has had an opportunity to speak to that proposal.

Separately-gathered testimony also makes clear that any one of the proposals evaluated and not recommended does not prevent the others from advancing on the CPA's merits.



DATE: September 23, 2010

TO: Chair Ferris  
Bellevue Planning Commission

FROM: Nicholas Matz, Senior Planner 452-5371  
[nmatz@bellevuewa.gov](mailto:nmatz@bellevuewa.gov)

SUBJECT: Transportation-related Comprehensive Plan Amendments in Transportation Element figures, Bel-Red Subarea Plan, and Transportation Facility Plan (TFP) project descriptions

Comprehensive Plan Amendment (10-120231 AC) - October 13, 2010, Public Hearing

## I. PROPOSAL

This application initiated by the City Council would amend the Comprehensive Plan with transportation-related updates of existing policy and project lists to keep the Plan consistent with the GMA at RCW 36.70A.070 (6) for transportation elements. See Attachment 1 for a descriptive reference chart.

The proposed amendment to the Comprehensive Plan will update the following:

### **Transportation Element Figure TR.2 – Travel Demand Forecasts**

This figure that incorporates GMA-required travel demand forecasts is out of date—it “forecasts” to 2005. Updating the figure reflects 2020 travel demand forecasts, and reflects previously revised Mobility Management Area (MMA) boundaries. See Attachment 2 for the proposed Figure.

### **East Bellevue TFP Project List description of 120<sup>th</sup> Avenue improvements**

Project descriptions for 120th Avenue NE are currently included in two different parts of the Comprehensive Plan due to the corridor encompassing both the Wilburton and Bel-Red Subarea Plans. This amendment updates the project descriptions in the East Bellevue Transportation Facility Plan for the segment between NE 8<sup>th</sup> Street and the connection to the NE 4<sup>th</sup> Street extension, for consistency with the project as defined in those subarea plans. See Attachment 3 for the proposed Project List descriptions.

### **Bel-Red Subarea Transportation Project List description of Bel-Red Road from NE 20<sup>th</sup> Street to NE 24<sup>th</sup> Street**

This road segment on the border between Bellevue and Redmond has different project improvement designations in the Bridle Trails, Bel-Red, and Crossroads TFP; the East Bellevue TFP; and the Eastside Transportation Plan. This update resolves those differences. See Attachment 4 for the proposed Project List description

### **Classify NE 10<sup>th</sup> Street from 112<sup>th</sup> Avenue NE to 116<sup>th</sup> Avenue NE**

The recently-completed NE 10th Street extension over I-405 needs to be added to the Comprehensive Plan street classifications in Figure TR.3 – Existing Arterials and Freeways with Street Classifications. The proposal is Minor Arterial. See Attachment 5 for the proposed Figure.

## II. STAFF RECOMMENDATION

This proposal satisfies the Decision Criteria for a Comprehensive Plan Amendment and **staff recommends approval of the Comprehensive Plan Amendment to:**

- Amend the Transportation Element to adopt a new Figure TR.2 for Travel Demand Forecasts;
- Amend the East Bellevue Transportation Facility Plan (TFP) by adding an updated project list description at #583 for 120<sup>th</sup> Avenue NE improvements and renumbering the balance of the TFP project list;
- Amend the Bel-Red Subarea Plan by adding an updated project list description at #109 for Bel-Red Road between NE 20<sup>th</sup> and NE 24<sup>th</sup> Street and renumbering the balance of the project list, then eliminate current project descriptions for that road from the three other Comp Plan TFPs;
- Amend the Transportation Element to amend Figure TR.3 with an updated designation of NE 10<sup>th</sup> Street between 112<sup>th</sup> and 116<sup>th</sup> Avenues NE as Minor Arterial.

## III. BACKGROUND

**1.1 Figure TR.2—Travel Forecast Demand**—has been out of date for several years, but the city updates modeling and forecasting in the 12-year financially constrained TFP every two years. Nevertheless, the GMA mandate for a forecast of travel demand and the Mobility Management Area (MMA) boundary shifts associated with the Bel-Red Subarea Plan adoption together suggested a timely need to get this figure back to current, usable status.

**1.2** The set of transportation projects that were adopted during the recent Wilburton Corridor and Bel-Red Subarea planning processes included the **120<sup>th</sup> Avenue NE** corridor. The five Wilburton transportation projects include creating a new 4-lane arterial street extension on NE 4<sup>th</sup>, identifying and installing traffic calming mitigation on NE 5<sup>th</sup> St, creating a transportation corridor with NE 6<sup>th</sup> Street extensions, and improving the 116<sup>th</sup> Avenue NE and 120<sup>th</sup> Avenue streetscapes, respectively, all relate to the Wilburton vision of a mixed use retail/residential village on the west side of 120<sup>th</sup> Avenue NE.

Following the Wilburton process, transportation projects that are located within the Bel-Red Subarea were adopted as part of the Bel-Red Subarea Plan. As part of the Bel-Red effort a 120<sup>th</sup> Avenue project was identified and adopted for the segment that is within Bel-Red north of NE 8<sup>th</sup> Street. The result is a somewhat different project description than was adopted for the Wilburton subarea. The part south of NE 8<sup>th</sup>, that was originally adopted for Wilburton, is now proposed to be updated to make it consistent with the project adopted for Bel-Red, while retaining the elements of an enhance streetscape that are unique to the Wilburton segment.

**1.3** This stretch of **Bel-Red** between NE 20<sup>th</sup> and NE 24<sup>th</sup> Streets is currently described in three different TFPs—Bridle Trails, Bel-Red, and Crossroads (#208); East Bellevue (#505); and Eastside Transportation Plan (#R84)—and in three slightly different ways. Anticipating area redevelopment proposals on the Angelo’s site and on the Uwajimaya site, the City would need this project description (consistent with the description in Redmond’s Overlake Master Plan) to determine frontage improvements and/or right-of-way acquisition and setbacks associated with new development on either side of the street—in either city.

**1.4 Figure TR.3—Existing Arterials and Freeways with Street Classifications**—shows the existing arterial street network and is used to implement transportation and other multi-modal policy affecting the arterial street network. It needs to reflect NE 10<sup>th</sup> Street now that the street is built.

#### IV. DECISION CRITERIA

The Decision Criteria for a Comprehensive Plan Amendment are set forth in the Land Use Code, Section 20.30I.150. Based on the criteria, Department of Planning and Community Development staff has concluded that the proposed amendment merits **approval**. This conclusion is based on the following analysis:

**A. There exists obvious technical error in the pertinent Comprehensive Plan provision, or**

Not applicable to this proposal.

**B1. The proposed amendment is consistent with the Comprehensive Plan and other goals and policies of the city, the Countywide Planning Policies (CPP), the Growth Management Act and other applicable law; and**

The proposed amendment is consistent with the Comprehensive Plan and other goals and policies in these planning documents for urban growth development.

##### **Comprehensive Plan**

This proposed amendment is consistent with current general policy in the Comprehensive Plan towards consistency with the GMA, realizing the city's vision for a community of diverse and vibrant neighborhoods, identifying the Eastside's Transportation hub offering an array of mobility choices, and being known as a city served by outstanding community facilities (*Meeting the Challenges for Tomorrow – Bellevue 2025 Vision statements pp. 21-25*).

The proposed amendment supports long-term actions which are implementing the Plan in the area of subarea planning and developing a capital investment program that allocates resources to projects that will spur the city's redevelopment in the direction envisioned in the Plan (*How is the Plan Implemented, Introduction, p. 9*).

The proposed amendment is consistent with policy implementation in the Countywide Planning Policies (CPPs) and GMA for urban growth areas development:

##### **Growth Management Act**

In its current form, the proposal is consistent with GMA Planning Goals of Urban growth, Reduce sprawl, Transportation, Economic development, Property rights, Open space and recreation, Citizen participation and coordination, and Public facilities and services.

The proposal is inapplicable to GMA Planning Goals of Housing, Permits, Natural Resource Industries, Open space and recreation, Environment, Historic preservation, and Shorelines.

##### **Countywide Planning Policies**

Countywide Planning Policies for King County are organized by topics in nine separate chapters. The framework policies in each chapter are implemented through local plans and regulations. Evidence of the proposal's consistency with framework policies is as follows:

**I. Critical Areas** *Not applicable to this proposal.*

- II. **Land Use Pattern** *The proposal is consistent with the implementation of the desired urban land use pattern for development at urban area densities.*
- III. **Transportation** *The proposal is consistent with a land use pattern that shall be supported by a balanced transportation system which provides for a variety of mobility options (FW-18). It is consistent with efforts to prioritize and program Transportation Improvement Program (TIP) improvements (T-3). It supports multi-modal improvements to the arterial network (T-8).*
- IV. **Community Character and Open Space** *The proposal will improve the City's ability to support a diversity of places to live, work and recreate.*
- V. **Affordable Housing** *Not applicable to this proposal.*
- VI. **Contiguous and Orderly Development and Provision of Urban Services to Such Development** *The proposal supports jurisdictional efforts to identify the services needed to achieve adopted service levels and their associated timelines (FW-30).*
- VII. **Siting Public Capital Facilities of a Countywide or Statewide Nature** *Not applicable to this proposal.*
- VIII. **Economic Development** *The proposal helps to sustain the economic vitality of identified Employment Centers in the urban area and strengthens efforts to expand and diversify the economy.*
- IX. **Regional Finance and Governance** *Not applicable to this proposal.*

**B2. The proposed amendment addresses the interests and changed needs of the entire city as identified in its long-range planning and policy documents; and**

The proposed amendment addresses the interests and changed needs of the entire city.

The Land Use Element directs employment and commercial growth into identified Employment Centers including the Bel-Red/SR-520 and 116<sup>th</sup>/Bellefield (Wilburton) centers. The proposal supports redevelopment efforts in these centers.

Updating 120<sup>th</sup> Avenue and Bel-Red street configurations make more coherent the connections between neighborhoods and larger subareas, between residential and commercial areas, and between existing and redeveloping uses such as the Wilburton retail village. These connections occur over time, and the city's long-range planning and policy documents identify the framework for them to do that.

The framework of the projects identified in the Wilburton study anchor at the neighborhood scale by plugging in to existing projects to mitigate associated traffic impacts on NE 5<sup>th</sup> Street. There is support for redevelopment in Wilburton that was most recently examined in the Wilburton Corridor Study CPA. This effort resulted in redevelopment expectations in this Subarea and in identifying the multimodal travel connections needed to coherently support them.

Next, 120<sup>th</sup> addresses connections between Wilburton redevelopment and the planning and implementation efforts in Bel-Red and Downtown. At this scale, the configuration is proposed

in expectation of not only of making more integrated choices for autos to travel around but also for people choosing other ways to connect.

Finally, as part of the city- and region-wide mobility puzzle, 120<sup>th</sup> acts as a missing piece to fit into visions for multi-modal options, with its clean connections to the street grid for auto, bus transit, bicycle, and recreational uses.

#### Wilburton policies related to 120<sup>th</sup> Avenue NE

- **S-WI-3.** Support the long term development of a “retail village” in the commercial area on the west side of 120th Avenue to provide a transition from more intense commercial areas to the west and the residential area to the east. Designate the area west of 120th Avenue NE between NE 8th and about NE 4th Streets, and on the east side of 116th Avenue from about NE 4th to SE 1st Streets General Commercial/Community Business (GC/CB). Without access improvements, the area remains appropriate for General Commercial uses. As NE 4th Street (East Bellevue Transportation Plan project #582) is extended to increase access to the area, Community Business uses are appropriate.
- **S-WI-25.** Improve local access, street system connectivity and traffic flow by providing additional east-west transportation connections, including an arterial street connection at NE 4th Street between 116th and 120th Avenues and HOV and non-motorized access at NE 6th Street between Downtown and 120th Avenue NE.
- **S-WI-27.** Coordinate off-street biking and walking facilities with on-street walking and biking facilities to provide safe connections to destinations such as schools, parks, shopping, and transit service.
- **S-WI-42.** Develop street tree plans for arterial streets and non-residential areas. Investigate ways to encourage property owners to implement the City’s street tree plan.
- **S-WI-53.** Provide enhanced street edge landscaping and, where appropriate, landscaped medians on 120th Avenue NE between NE 8th Street and NE 1st Street to soften the impact of commercial areas on the residential area to the east.

The proposed amendment addresses Bel-Red Subarea policy components supporting the land use plan with a multi-modal transportation system consistent with the map of [transportation] system improvements **S-BR-51** and **Figure S-BR.2**

#### Policies related to all of the amendment projects

The proposal addresses Comprehensive Transportation Element policy for designing the transportation system to provide for a variety of alternative transportation options.

- **TR-21.** Manage the transportation system through the Mobility Management Areas shown in Figure TR.1, the boundaries of which reflect street patterns, transit serviceability, topography, development patterns, and land use objectives.
- **TR-25.** Provide for adequate roadway, pedestrian, and bicycling connections in newly developing and redeveloping areas of the city, promoting both internal access and linkages with the rest of the city.

- **TR-27.** Follow guidance provided in the city’s long-range transportation plans, transportation studies, and subarea plans to identify, prioritize, and implement transportation system improvements.
- **TR-41.** Classify city streets according to their function, so that needed traffic capacity may be preserved, and planned street improvements will be consistent with those functions.
- **TR-44.** Design arterials and streets to fit the character of the areas through which they pass.
- **TR-78.** Implement the Pedestrian and Bicycle Transportation Plan by designing and constructing a safe and connective non-motorized transportation system.

**B3. The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended. See LUC 20.50.046 [below] for the definition of “significantly changed conditions”; and**

**Significantly changed conditions are defined as:** Demonstrating evidence of change such as unanticipated consequences of an adopted policy, or changed conditions on the subject property or its surrounding area, or changes related to the pertinent Plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole. *This definition applies only to Part 20.30I Amendment and Review of the Comprehensive Plan (LUC 20.50.046).*

The proposed amendment addresses these significantly changed conditions.

The information presented in Figures TR.2 and TR.3 is simply out of date. This needs to be amended so that users can rely on the Comprehensive Plan to continue to function as an integrated whole.

For 120<sup>th</sup> and for the Bel-Red Road descriptions the significantly changed condition represented by the Bel-Red Subarea planning process means an ongoing process of considered amendments as the city continues to integrate Bel-Red into other subarea planning implementation efforts. New projects (including 120<sup>th</sup> streetscape) were added to the East Bellevue TFP in anticipation of redevelopment implementation, but the comprehensive planning process hadn’t yet decided on the exact street profile for 120<sup>th</sup> as a component of this implementation. That issue has been clarified now and it is time to put that into the Plan.

**B4. If a site-specific proposed amendment, the subject property is suitable for development in general conformance with adjacent land use and the surrounding development pattern, and with zoning standards under the potential zoning classifications; and**

N/A

**B5. The proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare of the city.**

The proposed amendment demonstrates a public benefit, and enhances the public health, safety and welfare of the city and its residents.

## V. STATE ENVIRONMENTAL POLICY ACT

The Environmental Coordinator for the City of Bellevue has determined that this proposal will not result in any probable, significant adverse environmental impacts. A final threshold determination of non-significance (DNS) was issued on September 23, 2010. See Attachment 7.

## VI. PUBLIC NOTICE AND COMMENT

Notice of the Application was published in the Weekly Permit Bulletin and in the Seattle Times on August 19, 2010. The Bellevue City Council initiated this CPA on August 2, 2010. The amendment proposal was presented to the Planning Commission during a study session on September 15, 2010. Notice of the Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin and in the Seattle Times on September 23, 2010.

Pursuant to the requirements of the Growth Management Act, state agencies must be given 60 days to review and comment on proposed amendments to the Comprehensive Plan. A list of the 2010 amendments to the Bellevue Comprehensive Plan was provided to state agencies on September 13, 2010, for review.

The Transportation Commission reviewed the proposal in their September 8, 2010, study session. Commissioners concurred with the staff proposal for all four of the amendment pieces, asked some informational questions, and affirmed a need to clarify Figure TR.2 as representing *motorized* modes of travel.

The Best Buy Stores LP, representing their store at 457 120<sup>th</sup> Avenue NE, submitted comments on the proposal to update 120<sup>th</sup> Avenue NE improvements. See Attachment 6. They note essentially that

“description of improvements to 120<sup>th</sup> Avenue NE should accurately reflect that Phase [or Segment] 1 is a part of the connected NE 4<sup>th</sup> Street Extension and should be drafted in a manner which can accommodate changes to the NE 4<sup>th</sup> Street Extension route and accommodate the design and completion of Phase [or Segment] 2.”

The proposed update to 120<sup>th</sup> in the East Bellevue TFP of the Comprehensive Plan is not at odds with these comments, and the financially-constrained TFP (and the location of the combined project TFP-207 referenced in the Best Buy letter) is untouched by this CPA. The extent of the proposed CPA update (see Attachment 3) is to include a project location—*120<sup>th</sup> Avenue NE from NE 4<sup>th</sup> Street to NE 8<sup>th</sup> Street*; describe the project—*Widen to 5 lanes, include bicycle lanes and sidewalk on both sides*; and anchor it within the corridor for connections to Segment 2—*connect directly to East Bellevue TFP Project #514*.

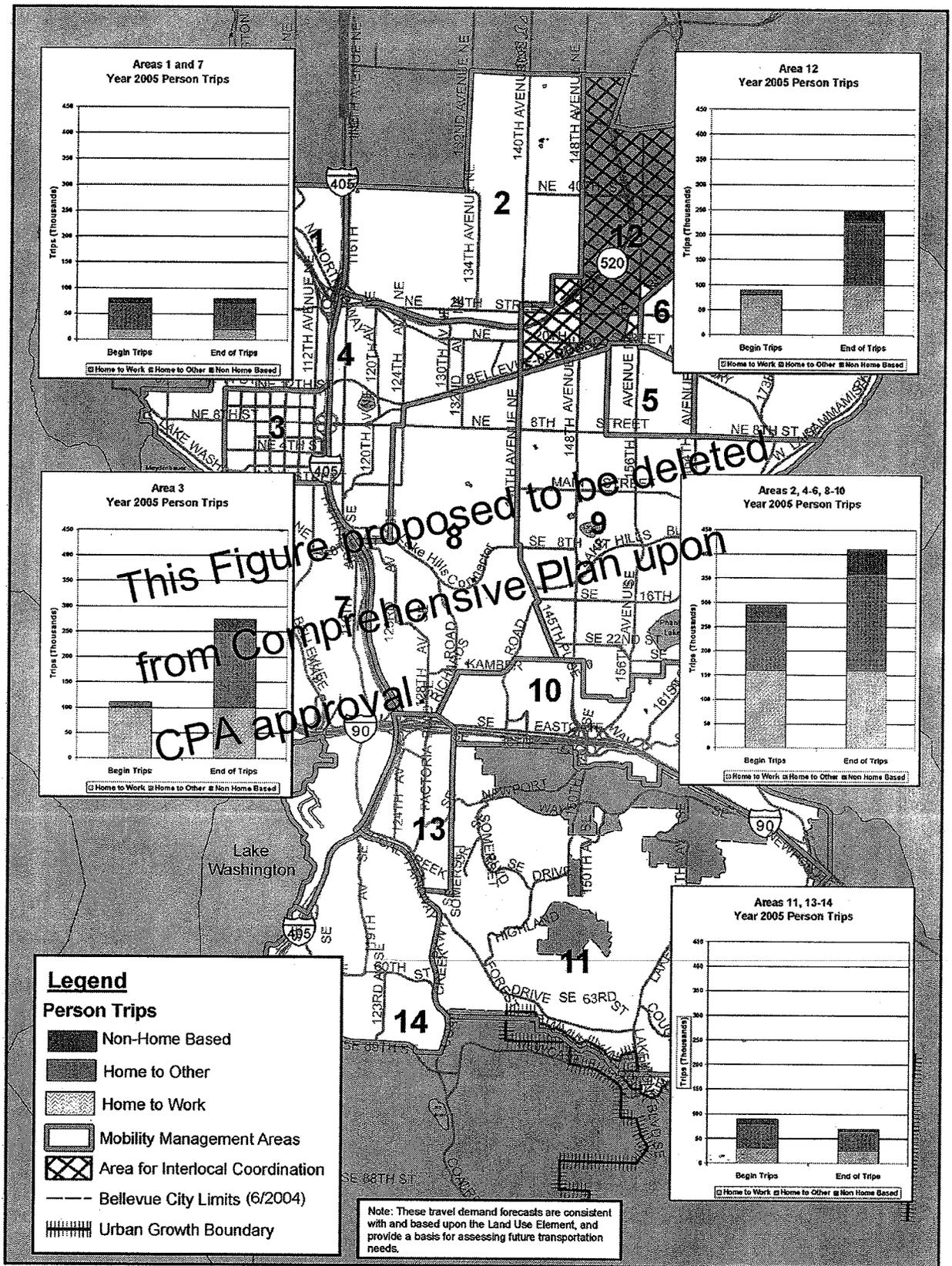
As to sequencing the corridor improvements, the adopted Mobility and Infrastructure (M&I) Initiative provides the framework for implementing the various segments in the 120<sup>th</sup> Avenue NE corridor and their connections to the intersection at NE 8<sup>th</sup> Street. Providing long-term project and policy direction today doesn't mean that full capacity on day one of operations will occur. Projects are implemented with awareness of the short- and long-term environmental and operational impacts.

## V. NEXT STEPS

**We request you conduct and close the public hearing, discuss the proposal, ask questions of staff, and make a recommendation.**

## **VI. ATTACHMENTS**

1. Existing Figure TR.2
2. Proposed Figure TR.2  
(Transportation Element)
3. 120<sup>th</sup> Avenue Project List description  
(East Bellevue TFP)
4. Bel-Red Road Project List Description  
(Bel-Red Subarea Plan)
5. 5a Proposed Figure TR.3  
(Transportation Element)
6. Best Buy LP public comment letter
7. SEPA Threshold Determination



**FIGURE TR.2**  
**Travel Demand Forecasts**  
**Mobility Management Areas**

# Attachment 2

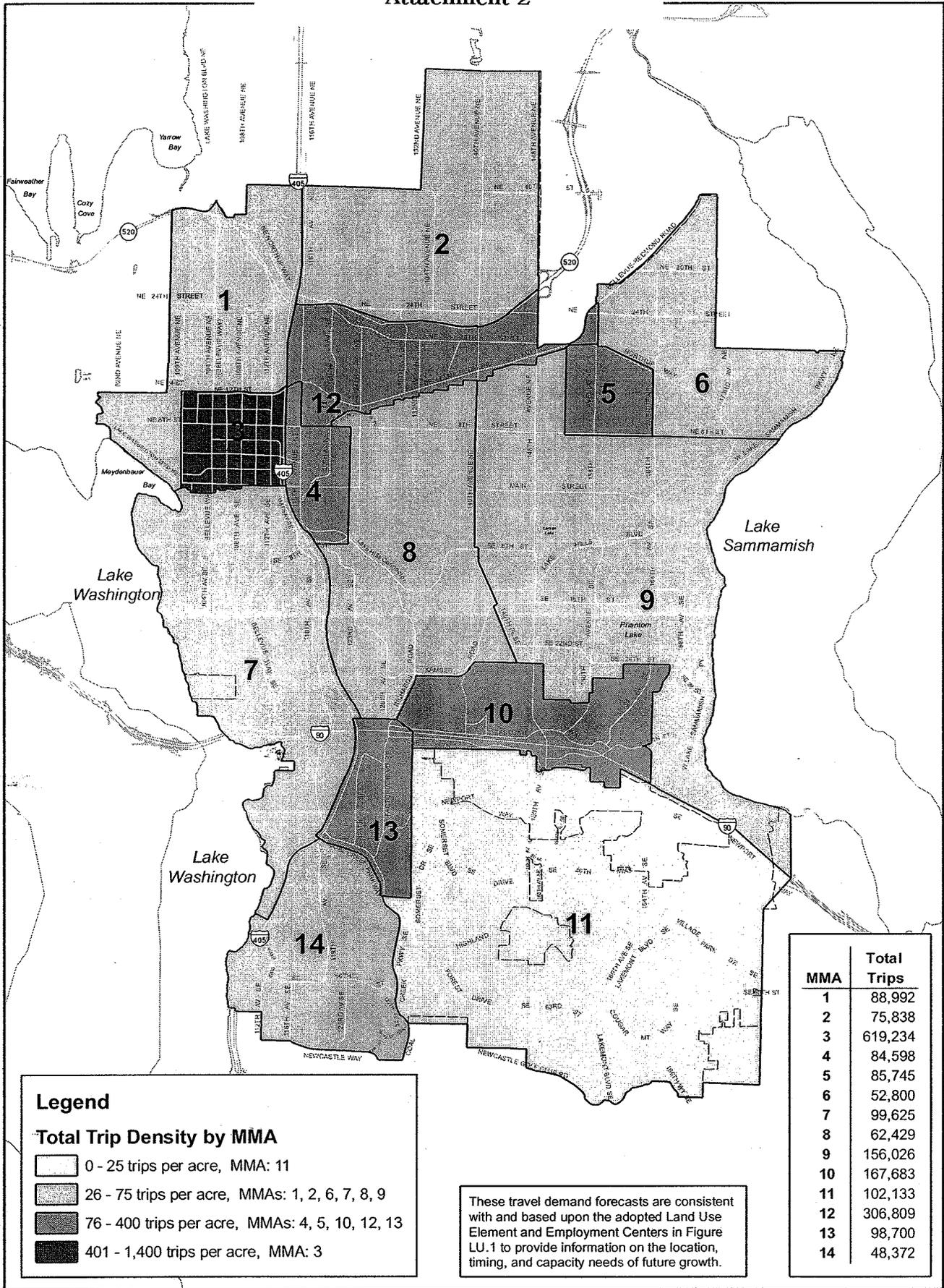


FIGURE TR.2

## 2020 Travel Demand Forecasts

Total Daily Person Trips - All Motorized Modes of Travel



### Attachment 3

## **120<sup>th</sup> Avenue NE draft project description**

*Transportation Project List chart as continued through p. 318...*

Project Number	Project Location	Project Description
582	NE 4 <sup>th</sup> Street between 116 <sup>th</sup> Avenue NE and 120 <sup>th</sup> Avenue NE	Create a new 4 lane arterial street connection with street landscaping, non-motorized facilities, and turn lanes as needed to provide efficient intersection movement
<b><u>583</u></b>	<b><u>120<sup>th</sup> Avenue NE from NE 4<sup>th</sup> Street to NE 8<sup>th</sup> Street</u></b>	<b><u>Widen to 5 lanes, include bicycle lanes and sidewalk on both sides; connect directly to East Bellevue TFP Project #514.</u></b>
5834	NE 5 <sup>th</sup> Street between 120 <sup>th</sup> Avenue NE and 124 <sup>th</sup> Avenue NE	Identify and install traffic calming mitigation measures to reduce neighborhood impacts in accordance with a neighborhood implementation plan.
5845	NE 6 <sup>th</sup> Street multi-modal corridor between 112 <sup>th</sup> Avenue NE and 120 <sup>th</sup> Avenue NE	Create a transportation corridor which includes: a three-lane HOV connection to I-405 from 120 <sup>th</sup> Avenue; General access to the parcels east of the BNSF rail line; and Non-motorized facilities connecting to 112 <sup>th</sup> Avenue to 120 <sup>th</sup> Avenue.
5856	116 <sup>th</sup> Avenue NE between NE 8 <sup>th</sup> Street and SE 1 <sup>st</sup> Street	Improve the 116 <sup>th</sup> Avenue NE streetscape, including select median landscaping areas.
5867	120 <sup>th</sup> Avenue between NE 8 <sup>th</sup> Street and NE 1 <sup>st</sup> Street	Improve the 120 <sup>th</sup> Avenue NE streetscape, including select median landscape areas.

Attachment 4

**Bel-Red between NE20th Street and NE 24<sup>th</sup> Street project description**

*Table 1 Bel-Red Transportation Project List chart as continued through p. 49...*

<b>Arterial Project</b>	<b>Description of Arterial Improvement</b>
108	<b>136<sup>th</sup> PINE</b> 3-lanes (2 southbound, 1 northbound) Light rail running above grade in the median Sidewalks both sides Bike lanes on both sides
<b><u>109</u></b>	<b><u>Bel-Red Road between NE 20<sup>th</sup> Street and NE 24<sup>th</sup> Street</u></b> <b><u>5 lanes</u></b> <b><u>Two travel lanes in each direction</u></b> <b><u>Center turn lane</u></b> <b><u>Bicycle lanes in each direction</u></b>
<b><u>10910</u></b>	<b>NE 11<sup>th</sup>/NE 12<sup>th</sup></b> 4/5 lanes 116 <sup>th</sup> Avenue NE to NE 12 <sup>th</sup> Street

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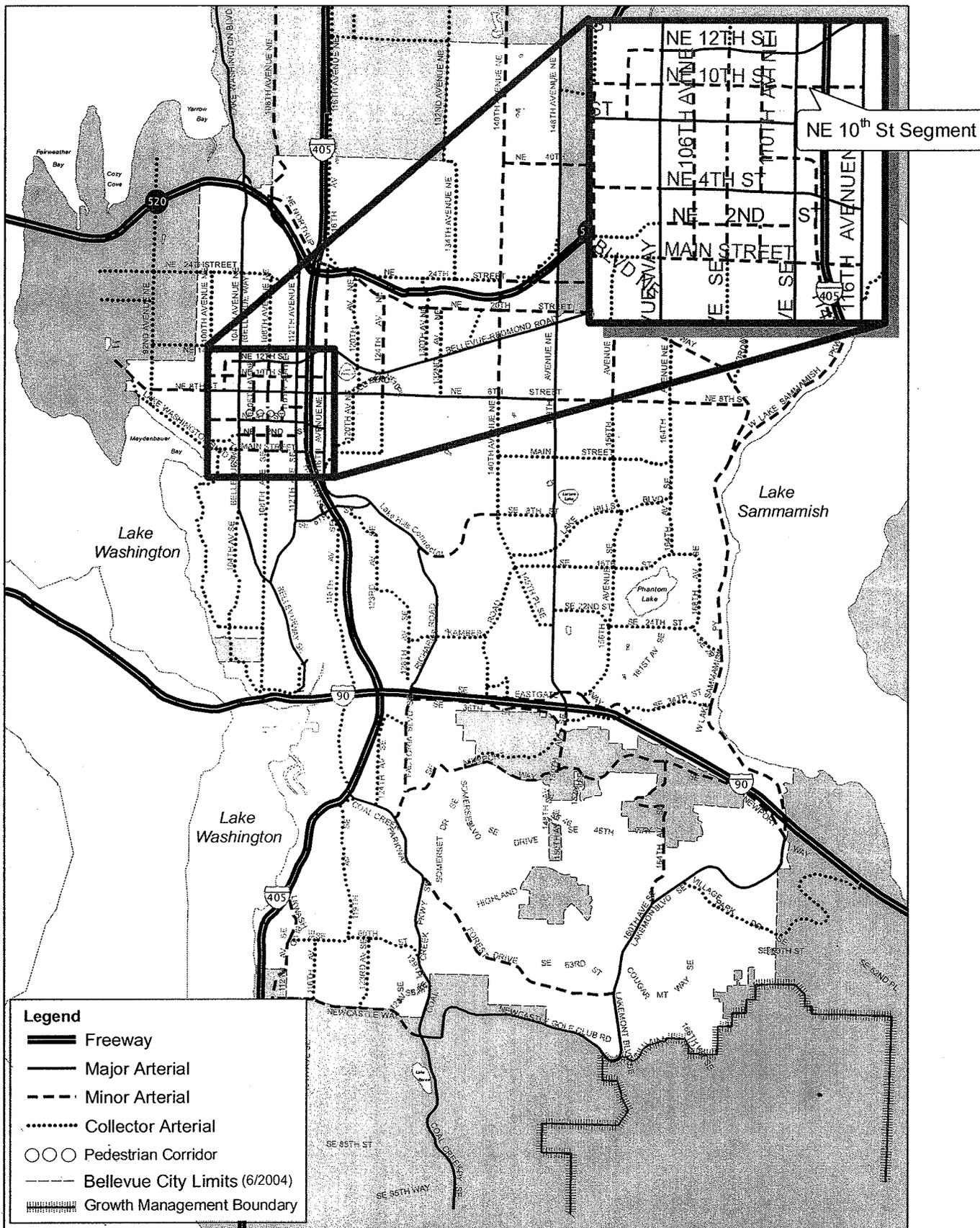
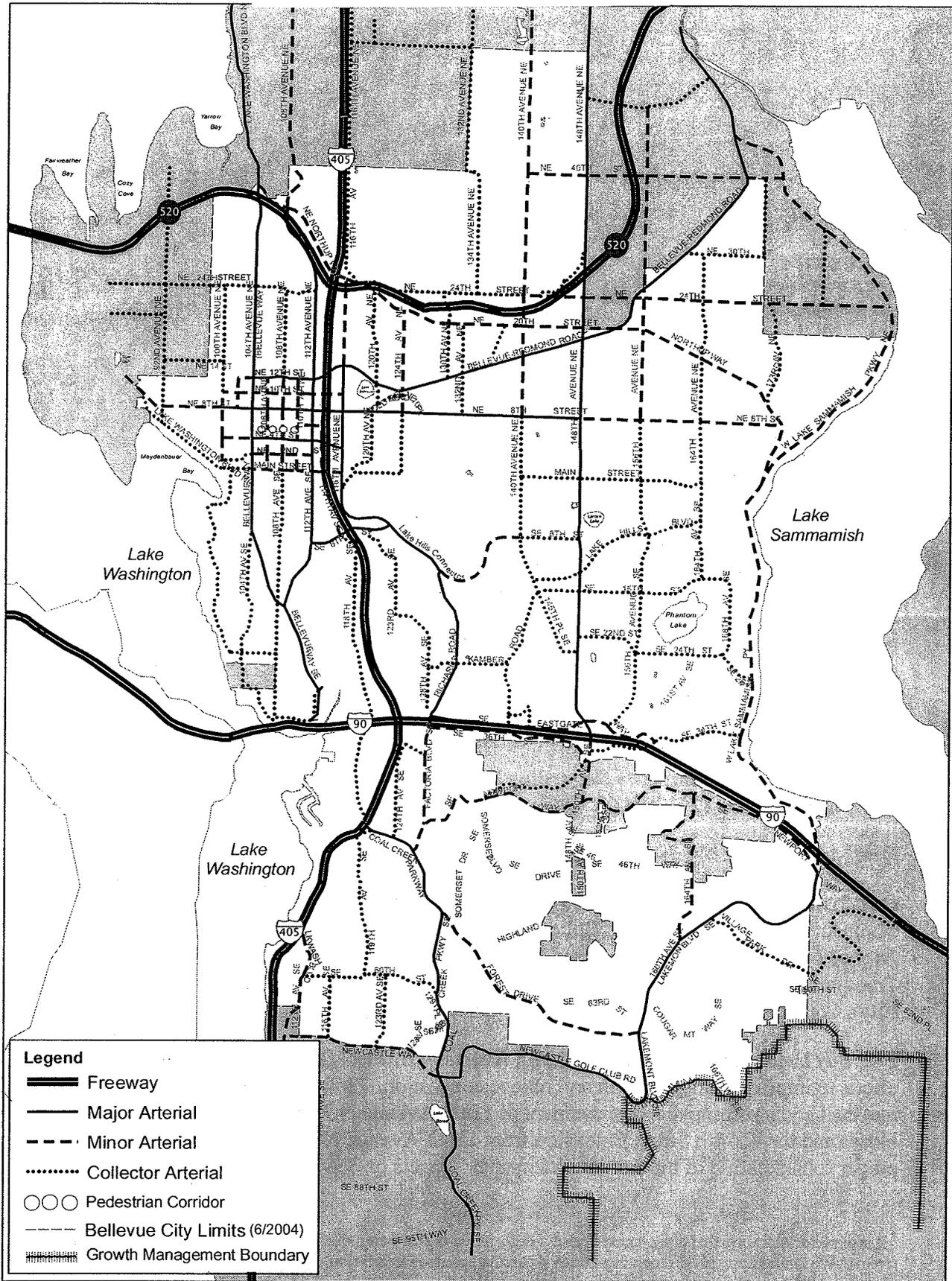


FIGURE TR.3

Existing Arterials and Freeways  
with Street Classifications





**FIGURE TR.3**  
**Existing Arterials and Freeways**  
**with Street Classifications**



Attachment 6



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September 2, 2010

**Via Electronic Mail; Hard Copy to  
Follow Via U.S. Mail**

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**RE: Best Buy's Comments Regarding Proposed Comprehensive Plan Amendments  
(File No. 10-120231 AC)**

Dear Mr. Matz and Mr. Jackson:

On behalf of our client, Best Buy Stores LP ("Best Buy"), we submit the following comments regarding the City of Bellevue's ("City's") "updated description of the 120th Avenue NE improvements" proposed for inclusion in the Bellevue Comprehensive Plan, Transportation Facility Plan ("TFP") element. This letter is submitted in response to the City's Comprehensive Plan Amendments application made on August 2, 2010.<sup>1</sup>

Best Buy has a store located at 457 120th Avenue NE. Best Buy appreciates the City's efforts to improve transportation and relieve congestion. However, Best Buy is concerned that the City is rushing the improvement of 120th Avenue NE between the 300 and 700 blocks and the NE 4th Street Extension from 116th Avenue NE to 120th Avenue NE without proper consideration of the full environmental impacts or possible alternatives to the current

<sup>1</sup> It is our understanding that a proposed updated description is still being drafted and is not yet available for public review. We would appreciate receiving notice when the updated description or any other materials are prepared.

proposals. For purposes of the present Comprehensive Plan Amendments, Best Buy has the following comments.

First, TFP-207 of the City's current TFP appropriately treats the 120th Avenue NE improvement between NE 4th Street and NE 8th Street ("Phase 1")<sup>2</sup> and the extension of NE 4th Street from 116th Avenue NE to 120th Avenue NE as one project. This existing description recognizes and comports with the primary purpose of Phase 1 which is "to help accommodate new circulation patterns created by the construction of the NE 4th Street Extension from 116th to 120th Avenues NE."<sup>3</sup> Any updated project description should continue to recognize that Phase 1 is inextricably linked with the NE 4th Street Extension. Without the NE 4th Street Extension or other Wilburton Connections proposals, there is no public necessity for Phase 1. The description of Phase 1 should accurately reflect that it is a part of the NE 4th Street Extension.

Second, the design of Phase 1 necessarily depends on the route chosen for the NE 4th Street Extension and NE 6th Street Extension. For example, one possible route for the NE 4th Street Extension is to have NE 4th Street curve to the north and then connect with 120th Avenue NE at its current intersection with NE 5th Street. Under this alternative there is no need to widen 120th Avenue NE all the way to the 300 block. Note that there is nothing in the Comprehensive Plan or "Retail Village" concept that precludes an alternative route for NE 4th Street. Rather, as discussed below, constructing Phase 1 or even Phase 2 of the 120th Avenue NE improvements without completing overall connections and providing traffic calming in the Wilburton neighborhood may defeat the goals of the "Retail Village" concept, such as walkability and pedestrian-oriented uses. Accordingly, the project description of Phase 1 should be drafted in a manner which can accommodate changes to the current proposal for the NE 4th Street Extension.

Third, Phase 1 is inextricably linked to all the Wilburton Connections proposals as well as Phases 2 and 3 of the 120th Avenue NE improvements. For example, until completion of the north connection at 120th Avenue NE and NE 8th Street to the Bel-Red area, there will be nowhere for increased traffic to go once the NE 4th Street and NE 6th Street extensions are complete, except for into the Wilburton neighborhood. The City should complete "Phase 2," the crossing of 120th Avenue NE and NE 8th Street, before Phase 1. The project description of Phase 1 should be drafted in a manner which can accommodate the design and completion of Phase 2 and other neighborhood traffic improvements.

<sup>2</sup> 120th Avenue NE will be widened to five lanes from just south of NE Eighth Street to south of NE 12th Street as part of "Phase 2," and widened from NE 12th Street to Northup Way as part of "Phase 3."

<sup>3</sup> February 1, 2010 City Council Agenda Memorandum SS 2-197.

Nicholas Matz and Matthews Jackson  
September 2, 2010  
Page 3

As a neighbor and stakeholder in the Bellevue business community, Best Buy appreciates the City's efforts to comprehensively plan for its transportation improvements. The description of improvements to 120th Avenue NE should accurately reflect that Phase 1 is a part of the connected NE 4th Street Extension and should be drafted in a manner which can accommodate changes to the NE 4th Street Extension route and accommodate the design and completion of Phase 2.

Thank you for your time and consideration.

Very truly yours,

/s/ Jerry Lutz  
R. Gerard Lutz

cc: Melissa Moseley, Director Real Estate Best Buy  
Kate Berens, Deputy City Attorney  
Marina Arakelyan, Senior Project Manager, Transportation Department  
Bob Shay, President, Wilburton Community Council



DEVELOPMENT SERVICES DEPARTMENT  
 ENVIRONMENTAL COORDINATOR  
 450 110<sup>th</sup> Ave NE., P.O. BOX 90012  
 BELLEVUE, WA 98009-9012

**DETERMINATION OF NON-SIGNIFICANCE**

**PROPONENT:** City of Bellevue

**LOCATION OF PROPOSAL:** N/A

**DESCRIPTION OF PROPOSAL:** 2010 Annual Amendments to the Comprehensive Plan, including a Work Program and proposed amendments to the Bellevue Comprehensive Plan for purposes of RCW 36.70A.130, assuring that the Plan continues to comply with the requirements of the GMA and including consideration of emerging local and regional needs, changes to state and federal laws, Bellevue's progress towards meeting GMA Goals, and whether the Plan is internally consistent.

**FILE NUMBER(S):** 10-120231 AC Transportation-related Comprehensive Plan Amendments in Transportation Element figures, Subarea plan project lists, and Transportation Facility Plan (TFP) project descriptions

The Environmental Coordinator of the City of Bellevue has determined that this proposal does not have a probable significant adverse impact upon the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030 (2) (C). This decision was made after the Bellevue Environmental Coordinator reviewed the completed environmental checklists and information filed with the Land Use Division. This information is available to the public on request.

- This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.
- This DNS is issued under WAC 197-11-340(2) and is subject to a 14-day comment period from the date below. Comments must be submitted by 5 p.m. on \_\_\_\_\_.

This DNS may be withdrawn at any time if the proposal is modified so that it is likely to have significant adverse environmental impacts; if there is significant new information indicating, or on, a proposals probable significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project), or if the DNS was procured by misrepresentation or lack of material disclosure.

This DNS is only appealable as part of the City's action on the amendment to the Land Use Code. In order to comply with requirements of SEPA and the State of Washington Growth Management Act for coordination of hearings, any appeal of the SEPA threshold determination herein will be considered by the Growth Management Hearings Board along with an appeal of the City Council's action. See LUC 20.35.250C.

Carole V. Hellenand  
 Environmental Coordinator

September 23, 2010  
 Date

**OTHERS TO RECEIVE THIS DOCUMENT:**  
 State Department of Fish and Wildlife      King County  
 U.S. Army Corps of Engineers                Muckleshoot Indian Tribe  
 Attorney General



**City of Bellevue  
Development Services Department  
State Environmental Policy Act Threshold Determination**

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Proposal Name: 2010 Annual Amendments to the Comprehensive Plan –  
Transportation-related Comprehensive Plan Amendments  
(CPA) in Transportation Element figures. Subarea Plan  
project lists, and Transportation Facility Plan (TFP) project  
descriptions

Proposal Address: citywide

Proposal Description: The proposal would amend the Comprehensive Plan with  
transportation-related updates of existing policy and project lists  
to keep the Plan consistent with the GMA at RCW 36.70A.070  
(6) for transportation elements, including amending the  
Transportation Element in Figures TR.2 and TR.3, the Bel-  
Red Subarea Plan Transportation Project Lists, and the East  
Bellevue Transportation Facility Plan Transportation  
Project List.

File Number: 10 - 120231 AC

Applicant: City of Bellevue, Department of Planning and Community  
Development

Decisions Included: SEPA Threshold Determination

Planner: Nicholas Matz AICP, 425-452-5371

State Environmental Policy Act  
Threshold Determination: **Determination of Non-Significance (DNS)**

*Carol V. Helland*  
\_\_\_\_\_  
Carol Helland,  
Environmental Coordinator

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Bulletin Publication Date: September 23, 2010

Appeal Deadline: An appeal shall be filed together with an appeal of the underlying Process IV  
action. The appeal shall be by petition to the Growth Management Hearings  
Board and shall be filed within the 60-day time period set forth in RCW  
36.70A.290.

For information on how to appeal a proposal, visit the Permit Center at City Hall or call (425) 452-6800.

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## **I. Proposal Description and Objectives**

The objective of this updating action is to keep the Comprehensive Plan consistent with the GMA for transportation elements at RCW 36.70A.070 (6). The proposed amendments to the Comprehensive Plan will update the following:

### **Transportation Element Figure TR.2 – Travel Demand Forecasts**

This figure that incorporates GMA-required travel demand forecasts is very out of date. Updating the figure reflects current travel demand forecasts for each Mobility Management Area (MMA).

### **East Bellevue TFP project list descriptions of 120<sup>th</sup> Avenue improvements**

Project descriptions for 120th Avenue NE are currently included in two different parts of the Comprehensive Plan due to the corridor encompassing both the Wilburton and Bel-Red Subarea Plans. This amendment updates the project descriptions in the East Bellevue Transportation Facility Plan for the segment between NE 8<sup>th</sup> Street and the connection to the NE 4<sup>th</sup> Street extension, for consistency with the project as defined in those subarea plans.

### **Bel-Red Subarea Transportation Project List description of Bel-Red Road from NE 20<sup>th</sup> Street to NE 24<sup>th</sup> Street**

This road segment on the border between Bellevue and Redmond has different project improvement designations in the Bridle Trails, Bel-Red, and Crossroads TFP; the East Bellevue TFP; and the Eastside Transportation Plan. This update resolves those differences.

### **Classify NE 10<sup>th</sup> Street from 112<sup>th</sup> Avenue NE to 116<sup>th</sup> Avenue NE**

The recently-completed NE 10th Street extension over I-405 needs to be added to the Comprehensive Plan street classifications in Figure TR.3 – Existing Arterials and Freeways with Street Classifications. The proposed classification is Minor Arterial.

## **II. Environmental Record**

The environmental review consisted of analysis based on the following documents included in the environmental record or incorporated by reference if so noted:

- Determination of Non-Significance – Comprehensive Plan Update (Bellevue) – fall 2004
- Determination of Non-Significance – Wilburton/NE 8<sup>th</sup> Street Corridor Study CPA (03-100836 AC)
- Non-Project Environmental Impact Statement for 2009-2020 Transportation Facilities Program (08-132179 LE)
- Bel-Red Corridor Programmatic Environmental Impact Statement (05-127994 LE) and July 17, 2008 Addendum and February 12, 2009 Addendum

### **III. Proposed Timing and Phasing**

The Bellevue Planning Commission is scheduled to hold public hearings on the amendment in October, 2010. The Bellevue City Council will likely take action on the amendments in the fourth quarter of 2010.

Additional environmental review will be phased as outlined at WAC 197-11-060(5). Actual development will be subject to environmental review at the time a specific application for development is made.

### **IV. Environmental Summary**

#### **Purpose and Need to Which the Proposal is Responding**

The purpose of the Transportation-related Comprehensive Plan Amendments (CPA) in Transportation Element figures and Transportation Facility Plan (TFP) project descriptions is to keep the Comprehensive Plan consistent with the GMA for transportation elements at RCW 36.70A.070 (6). There is a need for accuracy in forecasts and street classifications, and clarity in project descriptions that are consistent with adopted comprehensive subarea plans and policy.

#### **Major Conclusions, Significant Areas of Controversy and Uncertainty**

We conclude that there are no single or cumulative impacts from such amendment because impacts are foreseen by the Plan and will not lead to actions inconsistent with other elements of the Plan or the GMA when related to functional plan or project implementation of such actions derived from the amendment.

#### **Issues to be Resolved, Including Environmental Choices to be Made Between Alternative Courses of Action** None.

#### **Environmental Impacts of the Proposal**

A cumulative impact analysis for the 2010 Annual Amendments to the Comprehensive Plan has been prepared and is attached.

Environmental Review of the attached non-project environmental checklists indicates no probability of significant adverse environmental impacts occurring as a result of the proposals. Therefore, issuance of a Determination of Non-Significance (DNS) is the appropriate threshold determination under the State Environmental Policy Act (SEPA) requirements. The Environmental Checklist is available for review in the project file.

Adverse impacts which are less than significant are usually subject to City Code or Standards which are intended to mitigate those impacts. Where such impacts and related regulatory items correspond, no further documentation is necessary. For other adverse impacts which are less than significant, Bellevue City Code Section 22.02.140 provides substantive authority to mitigate

impacts disclosed through the environmental review process.

#### **V. Conclusion and Determination**

For the proposal, environmental review indicates no probability of significant adverse environmental impacts. Therefore, issuance of a **Determination of Non-Significance** pursuant to WAC 197-11-355 and Bellevue City Code 22.02.034 is appropriate.

Other adverse impacts that are less than significant may be mitigated pursuant to Bellevue City Code 22.02.140, RCW 43.21C.060, and WAC 197-11-660.

#### **VI. Mitigation Measures**

There are no recommended SEPA-based mitigating measures for this proposal. The lead agency has determined that the requirements for environmental analysis, protection and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter 36.70A RCW, and in other applicable local, state or federal laws or rules, as provided by RCW 43.21C.240 and WAC 197-11-158. This agency will not require any additional mitigation measures under SEPA.