



DEVELOPMENT SERVICES DEPARTMENT
 ENVIRONMENTAL COORDINATOR
 450 110th 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This DNS may be withdrawn at any time if the proposal is modified so that it is likely to have significant adverse environmental impacts; if there is significant new information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. Heiland
 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

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.

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 120th 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 8th Street and the connection to the NE 4th 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 20th Street to NE 24th 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 10th Street from 112th Avenue NE to 116th 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 8th 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.

**CITY OF BELLEVUE
ENVIRONMENTAL CHECKLIST
(Integrated SEPA/GMA Process)**

A. BACKGROUND INFORMATION

PROPOSAL TITLE: Transportation-related CPA Transportation Element figure, Subarea project list, and Transportation Facility Plan (TFP) Comprehensive Plan project description updates

PROPERTY OWNERS' NAME: N/A

PROPOSAL LOCATION (street address and nearest cross street or intersection as well as a legal description if available): citywide

PROPOSER'S NAME: City of Bellevue, Department of Planning and Community Development

CONTACT PERSON'S NAME: Nicholas Matz AICP

CONTACT PERSON'S ADDRESS: Department of Planning and Community Development
City of Bellevue
P.O. Box 90012
Bellevue, WA 98009-9012

CONTACT PERSON'S PHONE and EMAIL: 425-452-5371; nmatz@bellevuewa.gov

BRIEF DESCRIPTION OF THE PROPOSAL'S SCOPE AND NATURE:

1. General description:

The project proposes to amend the Transportation Element, Bel-Red Subarea Plan, and applicable Transportation Facility Plans (TFP) of the Comprehensive Plan to update specific figure and project descriptions as a result of previous Comprehensive Plan amendment action. The following figures and/or project descriptions will be updated:

- Transportation Element Figure TR.2 – Travel Demand Forecasts updates
- Bel-Red Transportation Facility Plan (TFP) Table 1 Transportation Project List - Updated description of 120th Ave improvements
- Bel-Red Subarea Plan - Table 1 Project List - Updated description of NE 15th/16th Street project
- Various TFPs - Updated TFP description of Bel-Red from NE 20th St to NE 24th St
- Transportation Element Figure TR.3 - Classify the NE 10th Street arterial from 112th to 116th Avenue NE

2. **Site acreage:** N/A
3. **Number of dwelling units/buildings to be demolished:** N/A
4. **Number of dwelling units/buildings to be constructed:** N/A
5. **Square footage of buildings to be demolished:** N/A
6. **Square footage of buildings to be constructed:** N/A
7. **Quantity of earth movement (in cubic yards):** N/A
8. **Proposed land use:** N/A
9. **Design features, including building height, number of stories and proposed exterior materials:** N/A.
10. **Other:**

Proposed timing or schedule (including phasing, if applicable):

The Transportation-related CPA figure and project description updates are being reviewed as part of the 2010 Annual Comprehensive Plan Amendments (CPA) work program and were initiated by action of the City Council on August 2, 2010.

Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. No.

List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

- Determination of Non-Significance – Comprehensive Plan Update (Bellevue) – fall 2004
- 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

Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. List dates applied for and file numbers, if known. There are no applications pending.

Provide a list of any known government approvals or permits that will be needed for your proposal. If permits have been applied for, list application date and file numbers, if known.

Ordinance action by the City Council for the figure and project description updates.

B. Environmental Elements

No discussion of the individual Environmental Elements is required for GMA actions per WAC 197-11-235.3.b.

C. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (do not use this sheet for project actions)

SUMMARY

Project Summary: This is a proposed amendment to the Comprehensive Plan, including the Transportation Element, the Bel Red Subarea Plan, and applicable Transportation Facility Plans (TFP) of the Comprehensive Plan. The projects are described in more detail under General Description on page 1.

Environmental Summary per WAC 197-11-235(3)(b):

State the proposal's objectives: To comply with the requirements of the GMA by amending the Comprehensive Plan for transportation elements at RCW 36.70A.070 (6).

Specify the purpose and need to which the proposal is responding: Keeping the Comprehensive Plan up to date.

State the major conclusions, significant areas of controversy and uncertainty: None.

State the issues to be resolved, including the environmental choices to be made among alternative courses of action: None.

State the impacts of the proposal, including any significant adverse impacts that cannot be mitigated: The proposal is a non-project action to update the Transportation Element, Bel-Red Subarea Plan, and applicable Transportation Facility Plans (TFP) of the Comprehensive Plan in accordance with Growth Management Act provisions.

Describe any proposed mitigation measures and their effectiveness: No specific development is being approved with this proposal. Future development under the provisions of the regulation will be subject to SEPA review, as well as to the city's development regulations.

1. How would the proposal be likely to increase discharge to water, emissions to air, production, storage, or release of toxic or hazardous substances; or production of noise?

- The plan amendments proposed will not directly increase discharges to water, emissions to air, produce, store or release toxic or hazardous substances, or produce noise.

Proposed measures to avoid or reduce such increases are: None.

2. How would the proposal be likely to affect plants, animals, fish or marine life?

There are no known direct impacts to plants, animals, fish or marine life that will result from the proposal.

Proposed measures to protect or conserve plants, animals, fish or marine life are: None.

3. How would the proposal be likely to deplete energy or natural resources?

The proposal is not likely to deplete energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are: None.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

There are no known direct impacts to sensitive areas, habitat, historic sites or other protected areas that will result from the proposal.

Proposed measures to protect such resources or to avoid or reduce impacts are: None.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal is not likely to affect land and shoreline use.

Proposed measures to avoid or reduce shoreline and land use impacts are: None.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

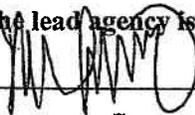
The proposal itself does not increase demands on transportation or public services and utilities.

Proposed measures to reduce or respond to such demand(s) are: None.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts are known or anticipated.

D. The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature  _____

Date Submitted 8.2.18

2010 CPA Cumulative Impacts Matrix	Impacts to non-project elements of the environment (see the environmental summary for details)							Cumulative impacts conclusion	Mitigation measures
(see reference for topic details)	impacts to water, air, toxic substances, noise impacts	affect plants, animals, fish, marine life	deplete natural resources	affect governmentally protected areas	affect adopted land and shoreline use	increase demands on transportation or public services/utilities	Foreseen by the Plan Consistent with GMA Goals Internally consistent	Impacts mitigated with regulatory or SEPA-authority mitigation	
Figure TR-2 Travel Demand Forecasts - Trans Element <i>Environmental checklist</i>	N/A	N/A	N/A	N/A	refinements to Plan	No	No impacts	N/A	
Updated description of 120 th Avenue improvements - TFPs <i>Environmental checklist</i>	N/A	N/A	N/A	N/A	refinements to Plan	No	No impacts	N/A	
Updated description of Bel- Red Road from NE 20 th St to NE 24 th St - Bel-Red Subarea <i>Environmental checklist</i>	N/A	N/A	N/A	N/A	refinements to Plan	No	No impacts	N/A	
Figure TR.3 Classify NE 10 th Street from 112 th to 116 th Avenue NE as Minor Arterial - Trans Element <i>Environmental checklist</i>	N/A	N/A	N/A	N/A	No	No	No impacts	N/A	



**2008 Annual Comprehensive Plan Amendments
Work Program STAFF REPORT AND RECOMMENDATION STATUS**

		Status	
Application Name <i>CPA application number (AC)</i>	Proposal	Council action to date Planning Commission public hearing date	Staff Recommendation Report Available
Transportation-related CPAs to Transportation Element figures, Subarea project lists, and Transportation Facility Plan (TFP) project descriptions <i>10-120231 AC</i>	<p>Amend the Transportation Element to adopt a new Figure TR.2 for 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).</p> <p>Amend the East Bellevue Transportation Facility Plan (TFP) by adding an updated project list description at #583 for 120th Avenue NE improvements, renumbering the balance of the TFP project list. Project descriptions for 120th Avenue NE are currently in two different parts of the Comprehensive Plan due to the corridor encompassing both the Willburton and Bel-Red Subarea Plans. This amendment updates the project descriptions for the segment between NE 8th Street and the connection to the NE 4th Street extension, for consistency with the project as defined in those subarea plans.</p> <p>Amend the Bel-Red Subarea Plan by adding an updated project list description at #109 for Bel-Red Road between NE 20th and NE 24th Street and renumbering the balance of the project list, then eliminate current project descriptions for that road from the three other Comprehensive Plan TFPs. 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.</p> <p>Amend the Transportation Element to amend Figure TR.3 with an updated designation of NE 10th Street between 112th and 116th Avenues NE as Minor Arterial. 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.</p>	<p>Council initiated 8/02/10 October 13, 2010</p>	<p>Approval September 23, 2010</p>



DATE: September 23, 2010

TO: Chair Ferris
Bellevue Planning Commission

FROM: Nicholas Matz, Senior Planner 452-5371
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 120th 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 8th Street and the connection to the NE 4th 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 20th Street to NE 24th 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 10th Street from 112th Avenue NE to 116th 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 120th 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 20th and NE 24th 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 10th Street between 112th and 116th 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 **120th Avenue NE** corridor. The five Wilburton transportation projects include creating a new 4-lane arterial street extension on NE 4th, identifying and installing traffic calming mitigation on NE 5th St, creating a transportation corridor with NE 6th Street extensions, and improving the 116th Avenue NE and 120th Avenue streetscapes, respectively, all relate to the Wilburton vision of a mixed use retail/residential village on the west side of 120th 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 120th Avenue project was identified and adopted for the segment that is within Bel-Red north of NE 8th Street. The result is a somewhat different project description than was adopted for the Wilburton subarea. The part south of NE 8th, 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 20th and NE 24th 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 10th 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 116th/Bellefield (Wilburton) centers. The proposal supports redevelopment efforts in these centers.

Updating 120th 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 5th 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, 120th 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, 120th 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 120th 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 120th 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 120th 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 120th 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.

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 120th Avenue NE, submitted comments on the proposal to update 120th Avenue NE improvements. See Attachment 6. They note essentially that

“description of improvements to 120th Avenue NE should accurately reflect that Phase [or Segment] 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 [or Segment] 2.”

The proposed update to 120th 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—*120th Avenue NE from NE 4th Street to NE 8th 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 120th Avenue NE corridor and their connections to the intersection at NE 8th 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. 120th 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

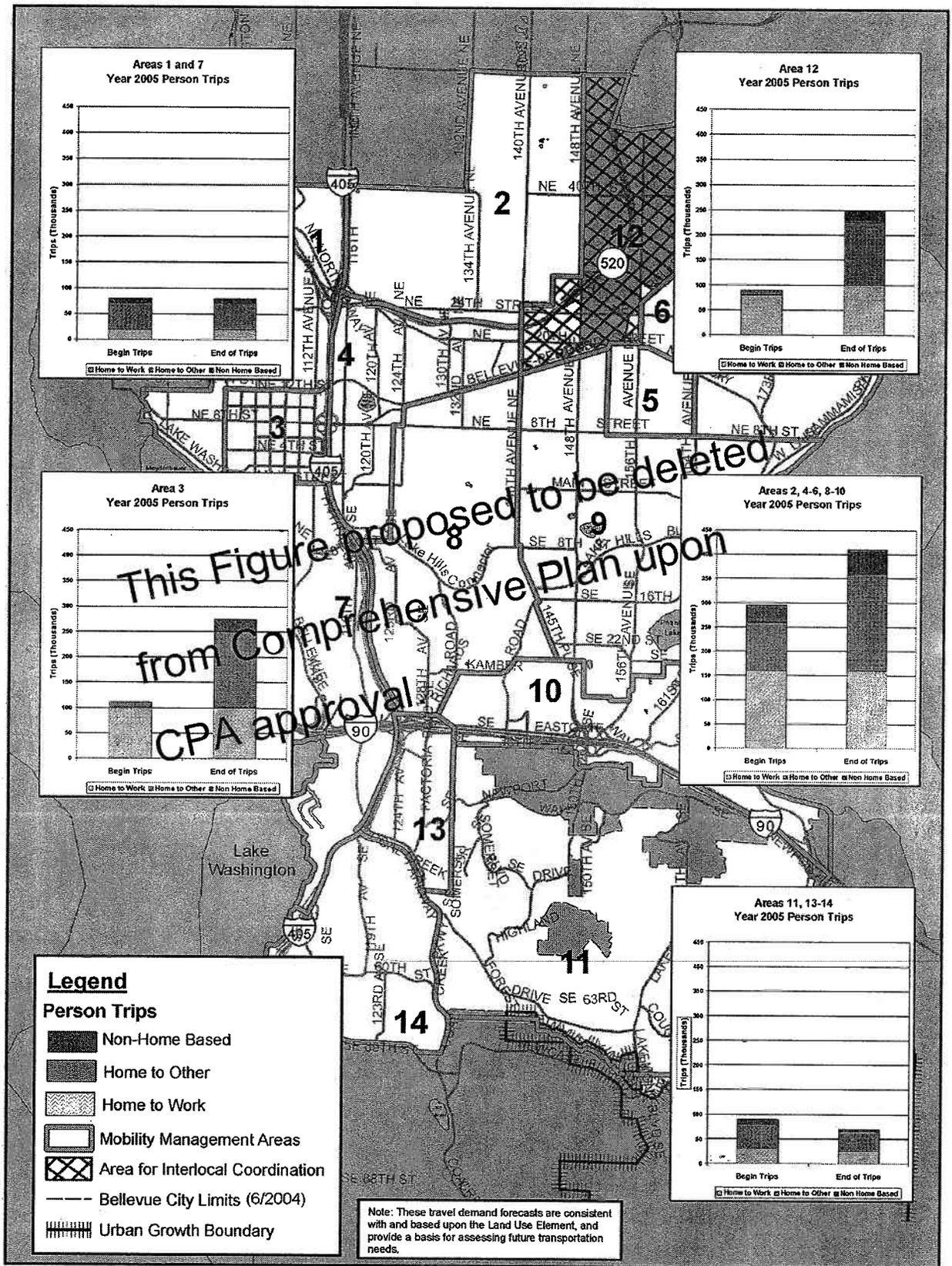


FIGURE TR.2
Travel Demand Forecasts
Mobility Management Areas

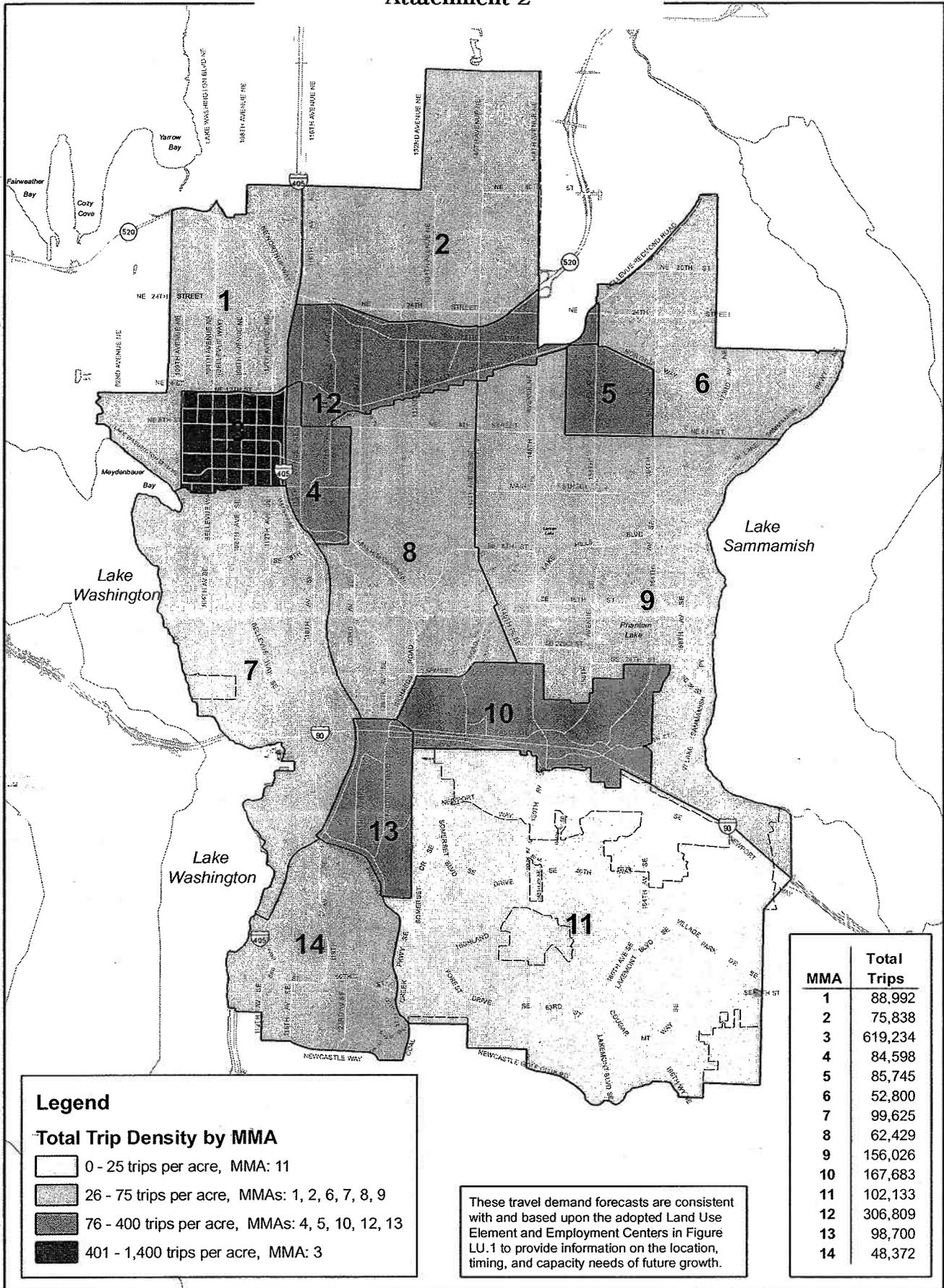


FIGURE TR.2

2020 Travel Demand Forecasts

Total Daily Person Trips - All Motorized Modes of Travel



Attachment 3

120th Avenue NE draft project description

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

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

Attachment 4

Bel-Red between NE20th Street and NE 24th Street project description

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

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

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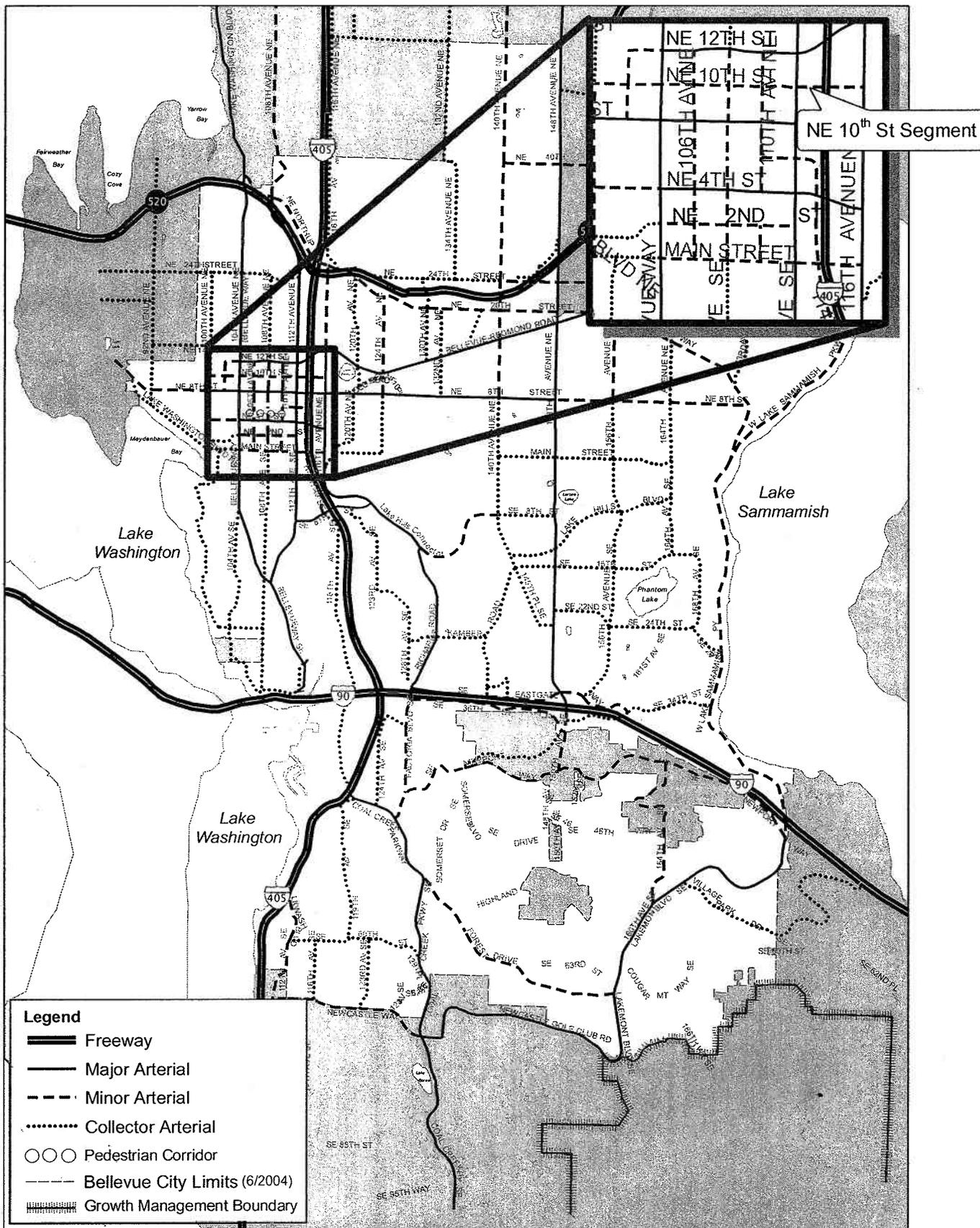


FIGURE TR.3
Existing Arterials and Freeways
with Street Classifications



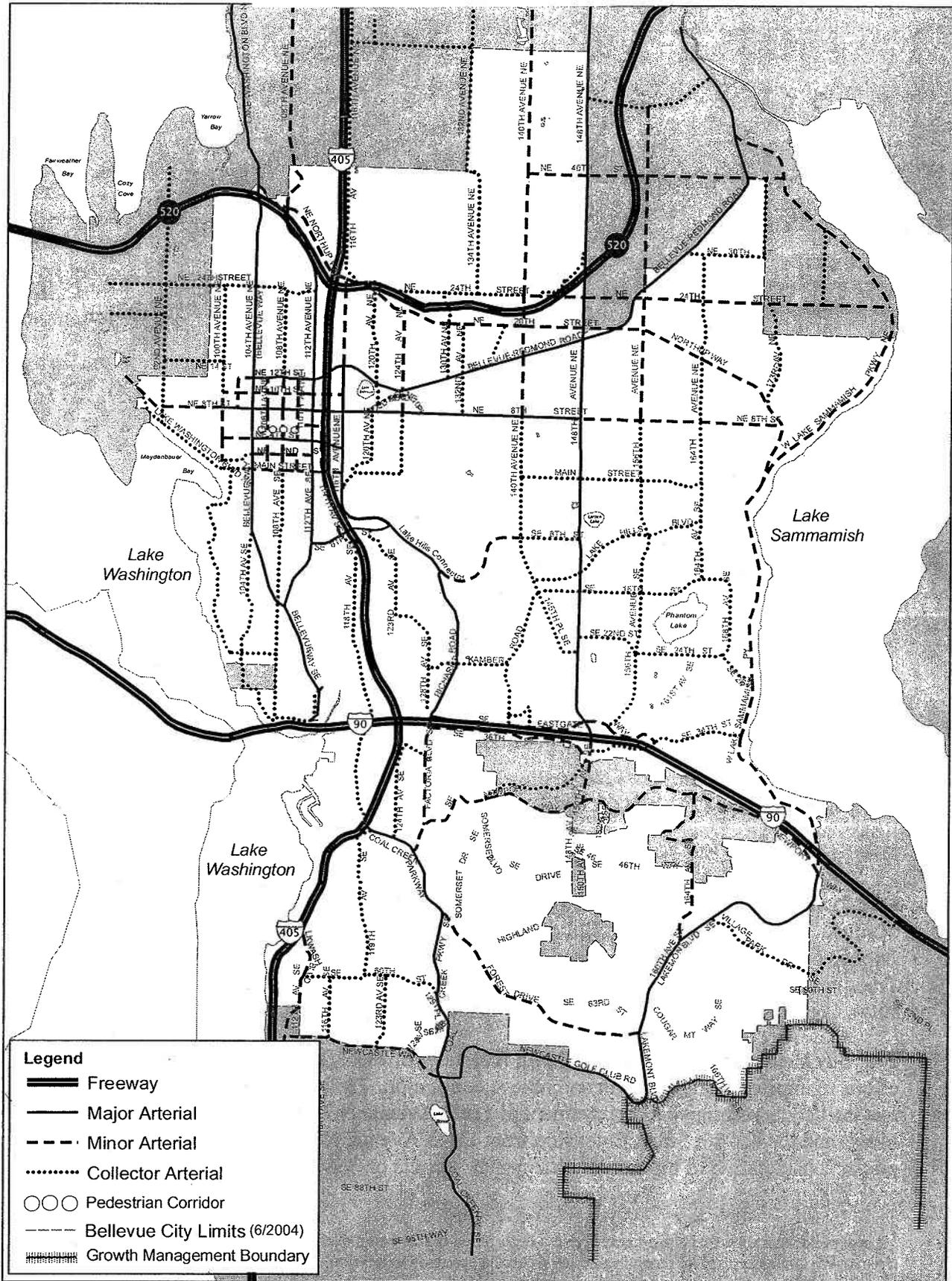


FIGURE TR.3
Existing Arterials and Freeways
with Street Classifications



Attachment 6



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September 2, 2010

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

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Mr. Matthews Jackson, SEPA Planner
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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, 2010.¹

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

¹ 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")² 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."³ 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.

² 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."

³ 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