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

A. BACKGROUND INFORMATION

PROPOSAL TITLE: Shoreline Master Plan Update (Files No. 07-122342 AC; 11-103227 AD).

PROPERTY OWNERS' NAME: N/A; applies City-wide

PROPOSAL LOCATION: Applies within the Shoreline Overlay District

PROPONENT'S NAME: City of Bellevue, Development Services Department

CONTACT PERSON'S NAME: Michael Paine, Environmental Planning Manager

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

CONTACT PERSON'S PHONE: (425) 452-2739

BRIEF DESCRIPTION OF THE PROPOSAL'S SCOPE AND NATURE:

1. General description: The City of Bellevue will amend the Bellevue Land Use Code (LUC) to include an update Shoreline Master Program (SMP). The updated master program will reside as a stand-alone SMP codified within Chapter 20.25E LUC and apply to all areas of the City within the shoreline jurisdiction. The comprehensive SMP amendment is intended to supplant the City's existing SMP in its entirety. The proposal also includes consistency amendments to other land use code sections, including the Critical Areas Overlay District Part 20.25H LUC to ensure internal consistency with the SMP as required under the Growth Management Act, Chapter 365.70A RCW.. The proposed amendments are needed to comply with the statutory deadline for comprehensive update of the local Shoreline Master Program pursuant to RCW 90.58.080.

2. Site acreage: Applies City-wide in shoreline jurisdiction (see attached map).

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: Shoreline uses and development consistent with the requirements of the Shoreline Management Act.

9. Design features, including building height, number of stories and proposed exterior materials: N/A

10. Other: N/A

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

A public hearing before the Planning Commission on the proposal is anticipated on May 25 of 2011. Further review by the Planning Commission will terminate in a recommendation and transmittal to the City Council for final local action prior to transmittal to the Department of Ecology. An additional public hearing may be part of City Council review.

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.

- City of Bellevue Revised Jurisdictional Determination
- City of Bellevue Shoreline Inventory and Analysis Report (January, 2009)
- City of Bellevue Shoreline Environment Designations
- City of Bellevue Restoration Plan (January, 2011)
- City of Bellevue BAS Review (March, 2005)
- Critical Areas Protection Measures DEIS (June, 2005)
- Critical Areas Protection Measures FEIS (May, 2006)
- City of Bellevue Lake Sammamish Ordinary High Water Mark Study (August, 2004)
- A Summary of the Effects of Bulkheads, Piers, and Other Artificial Structures and Shorezone Development on ESA-listed Salmonids in Lakes (July,2000)

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.

N/A

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

Ordinance adoption by the City Council. Final approval by Department of Ecology

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: The City of Bellevue will amend the Bellevue Land Use Code (LUC) to include an update Shoreline Master Program (SMP). The updated master program will reside as a stand-alone SMP codified within Chapter 20.25E LUC and apply to all areas of the City within shoreline jurisdiction. The comprehensive SMP amendment is intended to supplant the City's existing SMP in its entirety. Under state law, the Bellevue Shoreline Master Program is required to include the following components:

1. Shoreline Element of the Comprehensive Plan (policies)
2. Shoreline Overlay of the Land Use Code (regulations)
3. Critical Areas Overlay of the Land Use Code (regulations)
4. Shoreline Environment Designations (maps)
5. Shoreline Jurisdiction (maps)
6. Shoreline Inventory and Characterization (study)
7. Shoreline Restoration Element (plan)

The proposal also includes consistency amendments to other land use code sections, including the Critical Areas Overlay District Part 20.25H LUC to ensure internal consistency with the SMP as required under the Growth Management Act, Chapter 36.70A RCW. The proposed amendments are needed to comply with the statutory deadline for comprehensive update of the local Shoreline Master Program pursuant to RCW 90.58.

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

State the proposal's objectives: To update the City's Shoreline Master Program consistent with the requirements of Chapter 90.58 RCW, the Shoreline Master Program, including the Washington State Department of Ecology's implementing regulations, Chapters 173-26 and 173-27 WAC

Specify the purpose and need to which the proposal is responding: This update was mandated by the State Legislature to be completed by all cities and counties that have shorelines of the state within their jurisdictional limits. The City's SMP was originally developed in 1974 and has not had a substantial update since. As a result, it lacks a number of required components and is not aligned with current scientific information relevant to protecting shoreline functions and values. These gaps, combined with a lack of detailed performance standards aimed at guaranteeing use priority and public access, dictated that the City update its SMP in a manner consistent with the procedural and substantive requirements of the Shoreline Management Act (SMA) and its implementing rules, including Chapter 173-26 WAC, Shoreline Master Program Guidelines (Guidelines), and Chapter 173-27 WAC (Shoreline Management Permit and Enforcement Procedures). However, the update of the City's critical areas ordinance in 2006 provided partial protection to some critical shoreline resources via critical area buffers and significantly revised dock and bulkhead standards.

The Shoreline Master Program Guidelines (Guidelines) require a number of formulaic steps in developing an SMP beginning with a shoreline inventory and analysis designed to record existing conditions and assess, in a generalized way, ecological functions and ecosystem wide processes. This effort also provides a baseline of ecological functions and processes against which to measure the impacts of future development and change through time. This analysis included a series of management recommendations, many of which were incorporated in the proposed SMP. In response to this work, past experience with similar requirements, direction from the Guidelines, and extensive public input, the City also made adjustments to existing land uses, crafted new environment designations, and developed new shoreline policies and regulations as needed while incorporating existing critical areas policy and regulation as required. Significant in this effort was the preparation of a restoration plan. A cumulative impact analysis will be prepared once the final content of this draft plan is settled.

State the major conclusions, significant areas of controversy and uncertainty: When compared to the existing SMP and overlapping critical areas regulations, the proposed SMP will more closely comply with the consistent with the requirements of RCW 90.58.020, the approval criteria of RCW 90.58.090(3), the procedural requirements of RCW 90.58.090, the substantive requirements of RCW 90.58.100, and the requirements of Chapters 173-26And 173-27 WAC. The table below compares how the existing and proposed SMP addresses important required elements. The table, and the discussion that follows, focuses primarily on changes to residential shoreline regulations as the Urban Residential environmental designation encompasses the majority of Bellevue's shorelines so changes there have the most environmental significance. The second largest area in terms of acreage is publically-owned shoreline wetland that, apart from uses, is governed almost entirely by existing critical areas regulations.

Required SMP Element	Existing SMP and CAO	Proposed Draft SMP

Environment Designations	• Single residential environment only • Conditional use approval for other uses	• Six new environments based on completed Shoreline Analysis
Priority given to water-dependant, water related uses	• Limited recognition • CAO gave priority to protecting ecological functions	• Explicit recognition of water dependent recreational use of the shoreline
Enhance Public Access	• Policy focus limited	• Policy language enhanced
Protect Ecological Functions:	• 25' buffer with 25' setback on developed lots; • 50' buffer on undeveloped lots; • Existing legally-established development protected by "footprint: exception • Any development in setback or buffer triggers science-based report and mitigation • Setback and buffer may be reduced to accommodate proposed development with science-based report where buffer quality is low or net environmental benefit can be demonstrated.	• 50' setback on developed lots; • uses and development in setback allowed without special science-based studies • Explicit recognition of recreation use of shoreline • Existing legally-established development protected by "footprint" exception except where structure is located with conservation area. • Some uses allowed in setback without mitigation • Mitigation required for new development and for small-scale development over certain thresholds in setback • Setback dimension may be reduced a maximum of 25 ft. using prescriptive options • Special shoreline report for unique circumstances
Vegetation Conservation	• Strict preservation required as part of CAO buffer; • With the exception of routine landscape maintenance, any disturbance requires mitigation—generally native vegetation	• Flexible retention requirements for existing native vegetation • Imposition of a vegetation conservation area across 60% of the first 25 feet of setback on residential lots with new residences and certain other types of development • Area expanded to 50 feet in Urban Conservancy environments • Institution of landscape standard with new development • Mitigation standards require planting in conservation area when development exceeds certain thresholds in setback
Shoreline Modifications		

• Shoreline Stabilization	• New stabilization allowed only when avoidance shown to be infeasible • Clear preference for soft stabilization • Location limited to at or above OHWM • Height controlled • Repair permitted up to a minor threshold, beyond which applicant must show need • Soft stabilization required when engaging in major repair unless shown to be infeasible	• New stabilization allowed only when avoidance shown to be infeasible • Clear preference for soft stabilization • Range of options for both soft and hard • Location flexible based on type of stabilization installed; • With one exception, hard stabilization not permitted in floodplain unless residence is within 10 ft. of OHWM • Maximum height specified • Repair of existing stabilization permitted with measurable distinction between minor and major repair • Stabilization assumed to be required when doing major repair but soft preferred—hard allowed only when soft not feasible or residence located within 10 ft. of OHWM
• **Residential Moorage Standards**	• New residential docks subject to a single standard conforming closely to RGP-3 standard of USACE; • Total overwater coverage limited to 480 sf. • Dimensions established for walkways, ells and finger piers • Strict limit on number of boat and watercraft lifts • Floats allowed subject to depth requirement • Standards for materials • Repair of legally-established docks allowed up to specified threshold at which point proportional mitigation is required. • Reconfiguration or expansion involving the same or more overwater coverage must meet standards for new	• Standards for docks reflect local circumstances; • Side setbacks reduced from 12 to 10 ft. • Fewer specific design standards • Dock divided into walkway and moorage platform • No square footage limitation for walkway • Walkway limited to 4 ft. in width except expansion possible with 2:1 reduction to moorage platform • Platform must be located 30 ft. from shore or in 9 ft. of water • Platform limited to 250 sf. in Lake Sammamish and 350 sf. in Lake Washington. • Moorage platform user configurable—no specific standards in code • Increase in number of boat and watercraft lifts • Liberal repair standard allows entire dock surface, including stringers and joists and piling, to be repaired in the same

		configuration and dimension except grating required • Grated surface required with minor repair of decking • Reconfiguration permitted provided allowed moorage platform does not exceed legally-established platform or allowed maximum.
Non-Residential Moorage	• Walkways only in first 30 feet from OHWM • Grating required to maximum extent feasible • Skirting prohibited • Ells minimum size necessary to allow use • Floats permitted in depths over 10 feet subject to minimum necessary standard • Limitation of 150 ft. on length • Piling sizing and spacing standards • Construction material standards	• Mitigation required for all impacts to ecological function • New skirting and covered moorage prohibited • Ramp access required • Ramps and walkways only up to 9 ft. below OHWM • Light penetrable materials required on gangways, walkways and floats • Construction material standards expanded • New standards for new marina location and design • Liveaboards allowed • Stacked Boat storage allowed subject to standards • Setbacks required • Lighting designed to minimize glare and habitat impacts • Gangways • Public access required • Waste services required • Maintenance and repair plan required • Aircraft moorage allowed with mitigation
Residential Nonconforming development	• Legally-established primary structures subject to footprint exemption in buffer • May rebuild in footprint • Legally-established accessory structures deemed nonconforming in the shoreline buffer • Repair limited to minor nonstructural repairs	• Primary structures are subject to footprint exemption except in 25 ft. vegetation conservation area • May be repaired up to the 50% replacement threshold with allowances • Legally-established accessory structures in the vegetation conservation area may be repaired up to 50% replacement threshold with allowances .
Subdivision Standards	• No special shoreline standards	• New proposed criteria requiring clustering, dedication of

		vegetation conservation area, shared moorage and public access 9 lots or more
Restoration Plan	• None	• Required by Guidelines

State the issues to be resolved, including the environmental choices to be made among alternative courses of action:

Shoreline Protections: Bellevue's existing regulatory approach gives special attention to protecting the shoreline interface by employing structure setbacks and "no-touch" buffers, along with updated stabilization and dock standards, to limit development impacts to habitat functions important to aquatic species of local importance. Regulatory setbacks associated with native vegetation provide one of the best means to ensuring maintenance of the crucial connection between land and shore and the habitat and water quality benefits that come with it. The imposition of setbacks and buffers naturally constrain development within this sensitive area by limiting the actions and types of development that can occur there. Under Bellevue's current rules, some departures from the required setback and buffer dimensions are authorized; however, such departures require a science-based report demonstrating net improvement in ecological function above what otherwise would have occurred under the prescriptive standard. Such an approach generally results in vegetative improvements with the 25-foot buffer from Ordinary High Water Mark (OHWM). On some occasions, bulkheads or portions of bulkheads are removed to offset the impacts of new development within the setback or buffer. These improvements are generally deemed sufficient to offset development impacts to hydrologic, vegetative and habitat functions that arise from development within the setback or buffer, primarily because they accelerate the reestablishment of a vegetative connection close to the water's edge. Moreover, such improvements have the benefit of having been based on a site specific science-based study and arguably reflect a more accurate assessment of actual site conditions and impacts.

In drafting a new SMP, the City faced a substantial challenge in crafting more flexible standards to meet the water-dependent recreational objectives of the Shoreline Management Act and the Guidelines, while protecting ecological functions in the manner similar to that provided by the buffers of the critical areas ordinance. To offset the loss of the existing "no touch" buffer, the City maintained the same overall structure setback dimension (50 feet) while replacing the 25-foot buffer with a vegetation conservation area designed to occupy 60 percent of the previous buffer area. The remaining 40 percent was made available for water dependent recreation and enjoyment but with a limitation on new structures and impervious surfaces.

To further offset the protective benefits of the existing shoreline buffer, the City added a landscape standard for new residential development both outside and inside of the setback and vegetation conservation area and redevelopment within the setback area. Since this new standard applies to new development outside the setback—something not previously regulated

under the critical area protections—it may foster planting of the vegetation conservation area at a rate similar to or exceeding the mitigation typically required as an outcome of the critical area report process. This requirement is further supplemented with a mitigation options menu that incorporates into prescriptive regulation common mitigation options previously coming out of science-based, site specific analysis associated with the existing critical area report process. Since some measure of the existing buffer is almost always occupied by legacy development, and required access to docks and beaches is needed in both approaches, the actual difference in outcome between the existing critical area setback and buffer protections and those proposed in the updated SMP is judged to be relatively small and in keeping with the balancing required to provide for two potentially conflicting policy goals of the Shoreline Management Act: recreational access to the shoreline and no net loss of shoreline ecological functions.

Vegetation Management Standards: Because Bellevue's current critical areas regulations require a 25-foot "no-touch" buffer on the shoreline, preservation of existing native vegetation within the area included in that buffer is a reasonable expectation. In removing the buffer requirement, the City needed to ensure protection of existing native vegetation within some part of the newly established 50-foot structure setback to ensure no net loss of ecological function. The City chose to employ a vegetation overlay designed to protect native vegetation existing within the first 25 feet from OHWM. Existing tree protection standards apply elsewhere on the site outside of the 50-foot setback. Instead of protecting a fixed area, this approach protects native vegetation, thereby making modest recreational development of the shoreline more likely since detailed science-based reports are not required. Such an approach makes sense given the highly developed nature of Bellevue's major shorelines, the impact of legacy development, and the demand for recreational use of the shoreline area. The addition of new development elsewhere on the site may trigger replanting of up to 60 percent of this vegetation conservation area. This requirement further ensures conservation of native vegetation and planting of new vegetation. On balance, the proposed vegetation conservation requirements in the updated SMP compare favorably with the existing critical area standards requiring a "no-touch" buffer while ensuring no net loss of shoreline ecological functions.

Shoreline Modification (Docks): The City's purpose in updating the existing critical area dock standards was to simplify and clarify the standards while ensuring no net loss of ecological functions. As a result, the proposed standards, much like the existing critical area rules, focus on limiting the overwater coverage in the nearshore while pushing the moorage function out a minimum of 30 feet or to a length necessary to reach a depth of 9 feet, whichever is greater. Walkway width is restricted to four feet and the walkway must be grated. The key difference, however, is that new standards do not specify a particular moorage configuration or specific dimensional standard for ells or floats beyond restricting the amount of total overwater coverage of the moorage platform—in this case 250 square feet for Lake Sammamish and 350 square feet for Lake Washington—and requiring grating throughout. The result is an owner configurable moorage platform the ultimate approval of which depends on state and federal agencies. (The difference in size of moorage platforms is in response to the larger deepwater boats typically moored on Lake Washington compared with Lake Sammamish where smaller runabouts are common.

Since total overwater coverage is considered a potential indicator of net loss of ecological function, it is worth comparing the total overwater coverage allowed under the current critical area rules with that proposed under the proposed SMP. The current code restricts new docks to 480 square feet of total overwater coverage. This amount can be increased but only by means of a science-based critical areas report and with additional mitigation. Comparing this standard with that provided by the proposed SMP is complicated because of the uncertainty about how far the walkway will need to extend to reach the minimum depth requirement of nine feet. Assuming that, on average, a Lake Washington dock will have to extend at least 40 feet to reach the 9 foot depth, the amount of overwater coverage would total 510 feet comparing relatively favorably with the current requirement of 480 square feet. Similar calculations on Lake Sammamish result in 410 square feet of overwater coverage, substantially less coverage than the maximum allowed under current code. Under the assumption of a 40-foot walkway length, the maximum average over water coverage is 460 square feet across the two lakes. This number is actually overstated since the moorage platform is typically divided into a slip designed to accommodate a boat thereby reducing the total overwater coverage. On balance, the proposed dock standards in the updated SMP compare favorably with the existing critical area standards while ensuring no net loss of shoreline ecological functions.

Dock Repair: Given the urbanized character of Bellevue's lake frontage, most properties already are developed with a dock, making maintenance and repair an important concern. Under current rules, maintenance and repair of legally-established docks is permitted subject to a specific repair threshold above which proportional compliance to the new standard is required. Under the proposed SMP, the repair thresholds have been liberalized with the result that most docks can be fully repaired without triggering compliance with new standards. Complicated proportional compliance provisions have been eliminated and some items like material standards and grating have been made mandatory for all but the most modest repair actions; however, replacement of more than 50 percent of the piling triggers compliance with the standards for new docks.

Since the proposed repair standards in the updated SMP are modestly less restrictive than existing code, it is likely that a few repairs that would have previously triggered partial compliance based on more ecologically protective standards will not occur. However, such situations were rare as property owners preferred to make repairs just under the threshold so as not to trigger these provisions. Given such outcomes, the proposed dock standards in the updated SMP compare favorably with the existing critical area standards while ensuring no net loss of shoreline ecological functions.

Dock Reconfiguration: Proposals to reconfigure or replace existing residential docks are similarly treated in both the existing critical area standards and the proposed SMP. Such proposals must meet the requirements associated with new docks at LUC 20.25E.065.I.3 and 4. These provisions permit reconfiguration without significant coverage penalty provided the existing moorage platform is existed beyond the nine foot depth limitation.

Shoreline Modifications—New Stabilization: Bellevue's existing rules regarding shoreline stabilization were designed to be consistent with the standards provided in the Guidelines, allowing for minor repair of existing hard stabilization, but limiting new and replacement stabilization to those situations where need is clearly demonstrated to protect existing primary structures. The proposed SMP approaches the subject in the same way.

Avoiding the need for new stabilization is a primary policy objective of the Guidelines so development that purposefully avoids erosion hazards by locating the primary structure at a safe distance from Ordinary High Water to avoid those risks is preferred. Where an applicant perceives the need for stabilization on a site without it, he must prove it is needed by hiring a qualified professional to conduct a feasibility test. The test assesses a number of site specific factors, information about wind direction, speed, fetch and likely wave height, as well as risk to the structure and other factors.

Where stabilization is allowed, the new rules follow the prior critical area standards by articulating a clear preference for soft stabilization; hard stabilization is an option only when soft options are not technically feasible or the structure to be protected is so near (less than 10 feet) to OHWM that hardened stabilization is the default option. In picking soft solutions the applicant is now provided with a wide range of better defined options, outlined in order of priority, ranging from vegetative and bioengineered techniques to a combination of the first two options with some rigid structures incorporated for additional safety. When site conditions warrant the use of hard stabilization, an applicant is directed to a list of prioritized solutions ranging from 3:1 revetments with extensive live staking and other vegetative enhancement all the way to a near-vertical rock structure not to exceed 1.5:1. Under the proposed SMP, new vertical stabilization is not permitted.

In an improvement over the existing rules, the proposed SMP clarifies where stabilization may be located when a documented flood hazard area exists; only soft stabilization is permitted within the area of special flood hazard except that low-angle planted revetments are permitted due to their limit impact on flood storage. In general, stabilization measures are prohibited waterward of the OHWM with the notable exception that those measures that incorporate approved habitat improvements.

Shoreline Modifications—Repair: As previously provided under existing rules, repair of existing legally-established shoreline stabilization is allowed subject to certain thresholds, provided the damage or destruction is not so severe as to cause loss of structural integrity so sufficient as to jeopardize its erosion protection function. Where such a condition exists, or where the cumulative reconstruction exceeds 50 percent of the structure's linear length over a three year period, the proposed SMP defines such repair as major, making it subject to the standards for new stabilization measures, except that legally-established stabilization is presumed necessary; the feasibility test required to established whether or not stabilization is necessary is not required. The proposed SMP sets a clearer standard regarding what constitutes repair allowing maintenance and repair of legally-established stabilization to occur where necessary. On balance, the proposed stabilization standards in the updated SMP compare favorably with existing rules in terms of the protection afforded critical aquatic and shoreline resources while ensuring no net loss of shoreline ecological functions.

Subdivision standards: As part of the regulatory updates made in conjunction with the 2006 Critical Areas Update, a conservation short plat was added to the subdivision section of the City's Land Use Code. However, it applies only to those sites that abut a critical area of an acre or more, sites that abut known salmon streams, or sites where critical areas abut larger critical areas offsite, or large publically owned land managed for parks use or open space. While these conditions may sometimes occur in the Shoreline Overlay District, the proposed SMP includes some new criteria applicable to subdivisions of more than four lots to ensure no net loss of ecological function. Included is a lot clustering provision, compliance with public access standards for subdivisions of more than nine lots, tree retention requirements, dedication of the vegetation conservation area, and shared moorage provisions. These proposed criteria are new and represent additional protection not previously included the existing SMP, and represents improved protection for shoreline ecological functions.

Public Access: The existing SMP contains policy language supporting improved public access but this policy language lacks regulatory implementation. Given the emphasis in the Shoreline Management Act and the Guidelines supporting public access to shorelines, the proposed SMP includes regulations designed to protect, preserve and enhance the public's opportunity to enjoy the physical and aesthetic qualities of the shoreline and the water. These changes result in additional protection of public access not previously existing in the prior regulations.

Restoration Plan: The Guidelines include a requirement for a restoration plan designed, in part, to assist in offsetting long-term cumulative impacts of development in the Shoreline Overlay District, in an effort to avoid incremental and unavoidable degradation to shoreline ecological functions. The restoration plan is a new element, not previously included in the existing SMP, and while its force is only felt when implemented, it represents an important planning step to set the stage for potential future restoration of degraded shoreline conditions

State the impacts of the proposal, including any significant adverse impacts that cannot be mitigated: Long-term cumulative impacts of development in the shoreline will continue to degrade shoreline ecological functions absent a robust restoration initiative by the City of Bellevue. This is because many development actions fall below permit or mitigation thresholds, or permitted actions are not fully mitigated because of poor impact identification, mitigation design and implementation, or long-term temporal effects. Over time these small impacts accumulate further degrading shoreline ecological functions.

Describe any proposed mitigation measures and their effectiveness: No specific development is being approved with this proposal. No significant environmental impacts have been identified, therefore no mitigation measures are proposed.

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?

See discussion above

Proposed measures to avoid or reduce such increases are: N/A

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

The proposal should result in fewer significant impacts to plants, animals and fish because standards have been included that lessen impacts of new development like docks and shoreline stabilization and mitigation is required for those actions that have an impact on shoreline ecological functions.

Proposed measures to protect or conserve plants, animals, fish, or marine life are: N/A

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

See items 1 & 2 above.

Proposed measures to project or conserve energy and natural resources are: NA

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?

The proposal has no direct impact on these resources. Development authorized under this proposed SMP has the impacts outlined above.

Proposed measures to protect such resources or to avoid or reduce impacts are: N/A

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 a regulatory overlay designed to provide specific guidance with respect to uses in the shoreline.

Proposed measures to avoid or reduce shoreline and land use impacts are: N/A

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

None of the proposed amendments to the Land Use Code are likely to change the demands on the transportation system.

Proposed measures to reduce or respond to such demand(s) are: N/A

7. Identify, if possible, whether or not the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

This proposal will require consistency amendments to the City of Bellevue land use code as required under the Growth Management Act, Chapter 36.70A.RCW.

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_____