

Addendum  
to the  
Final Supplemental Environmental Impact Statement  
**2019–2030 Transportation Facilities Plan**

Prepared for:



Transportation Department  
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Prepared by:

**LEON**   
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This EIS Addendum has been prepared in compliance with the State Environmental Policy Act (SEPA) of 1971 (Revised Code of Washington Chapter 43.21C); the SEPA Rules, effective April 4, 1984, as amended (Washington Administrative Code Chapter 197-11); and the Bellevue Environmental Procedures Code (Bellevue City Code Chapter 22.02), which implements SEPA. The City of Bellevue Development Services Department has directed the areas of assessment that were undertaken in preparation of this document and has determined that this document has been prepared in a responsible manner using appropriate methodology.

**Date of Issuance of this EIS Addendum: July 11, 2019**

This document should be cited as:  
City of Bellevue. 2019. Addendum to the Final Supplemental Environmental Impact Statement: 2019-2030 Transportation  
Facilities Plan. Bellevue, WA. Prepared by Leon Environmental, LLC. July 2019



DEVELOPMENT SERVICES DEPARTMENT  
ENVIRONMENTAL COORDINATOR  
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## ADDENDUM

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**PROPONENT:** City of Bellevue

**NAME OF PROPOSAL:** 2019-2030 Transportation Facilities Plan

**LOCATION OF PROPOSAL:** The 2019-2030 Transportation Facilities Plan (TFP) identifies roadway capacity, safety/operational and non-motorized system improvements citywide. This Addendum is issued to document and respond to comments that were not included in the Final Supplemental Environmental Impact Statement for the 2019-2030 TFP.

**FILE NUMBER:** 19-107204-LE

**ORIGINAL PUBLICATION DATES:**

**Draft SEIS Available:** March 14, 2019

**Final SEIS Available:** June 27, 2019

**SEIS Addendum #1 Available:** July 11, 2019

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**DESCRIPTION OF PROPOSAL AND NEW INFORMATION:** The City proposes to update the Transportation Facilities Plan (TFP). The updated, 2019-2030 TFP includes 51 projects to address vehicular, transit, pedestrian and bicycle mobility, safety and maintenance needs.

The City has prepared this Addendum to document and respond to comments that were not included in the Final Supplemental Environmental Impact Statement for the proposed 2019-2030 TFP. Under Washington Administrative Code (WAC) section 197-11-706, an addendum is defined as "an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts of alternatives in the existing environmental document."

The Environmental Coordinator of the City of Bellevue has determined that the new information provided does not substantially change the analysis of likely significant impacts or alternatives in the existing environmental document. This Addendum is issued under WAC 197-11-600 and WAC 197-11-625.

  
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Environmental Coordinator

July 11, 2019  
Date

## Preface

The City of Bellevue regularly reviews and updates the 12-year Transportation Facilities Plan (TFP), which identifies roadway capacity, safety/operational and non-motorized system improvements citywide. A programmatic Final Supplemental Environmental Impact Statement (Final SEIS) for the 2019-2030 TFP was issued by the City on June 27, 2019.

After the Final Supplemental EIS was issued, it was found that a comment message from Kemper Development Company addressed to Peter Rosen, Environmental Planner had been routed to his spam folder and was missed for the development of the Final Supplemental EIS.

This Addendum has been issued to place the comments by Kemper Development Company and the responses on record, in the same manner as if they had been included in the Final SEIS.

An EIS Addendum is an environmental document that provides additional analysis or information about a proposal but does not substantially change the analysis of likely significant impacts or alternatives in the existing environmental document. The potential significant environmental impacts of the 2019-2030 TFP have already been evaluated in the Final SEIS.

The comments received from Kemper Development Company do not require change in the analysis of likely significant impacts or alternatives.

This EIS Addendum is not an authorization for an action, nor does it constitute a decision or a recommendation for action. This EIS Addendum and the Final SEIS will accompany the 2019-2030 TFP through the City's review processes and be considered by City officials in making decisions regarding adoption of the 2019-2030 TFP and implementation of projects included in the TFP.

## Response to Comments from Kemper Development Company



Dear Mr. Rosen,

Please accept the following questions from Kemper Development Company as part of the Draft Supplemental Environmental Impact Statement of the 2019-2030 Transportation Facilities Plan. Kemper Development Company is located at 575 Bellevue Square, Bellevue, Washington, 98004.

1. **Data Sources:** Page FS-3 refers to the Wilburton Commercial Area Land Use and Transportation Project Draft Environmental Impact Statement. The public has yet to see the Final EIS. In addition, the DEIS has not been approved by the Council. Should a DEIS, which may or may not be adopted, be included in the Draft SEIS for the TFP? 1
  
2. **Project Assumptions:** Project assumptions in the 2019-2030 TFP do not appear to line up with previously adopted plans. For example, projects included in the “2030 Baseline” of the Downtown Transportation Plan include:
  - a. Widening NE 2<sup>nd</sup> to five lanes between Bellevue Way and 112<sup>th</sup> Ave NE
  - b. A NE 6<sup>th</sup> Street extension across I-405 to 120<sup>th</sup> Ave NE
  - c. New ramps to/from east @ 124<sup>th</sup> Ave NE on SR 520
  - d. Bellevue Way SE HOV lane from 112<sup>th</sup> Ave SE to the South Bellevue Park and Ride2

Additionally, the “2030 Build” scenario includes a Southbound Braid from SR 520 to NE 10<sup>th</sup> Street, presumably including a NE 10<sup>th</sup> Street offramp.

Yet, in the 2019-2030 TFP DSEIS: TFP-190 (NE 2<sup>nd</sup> widening), TFP-217 (124<sup>th</sup> Ave NE at SR 520), TFP-268 (Bellevue Way HOV Segment B: Winters House to 112<sup>th</sup> Ave SE) are not included in the implemented TFP network – in other words – *not built* by 2030 as they are in the Downtown Transportation Plan. Further, the project description of TFP-211 (NE 6<sup>th</sup> Street extension) now states the extension will terminate at 116<sup>th</sup>, and not 120<sup>th</sup>. The region’s adopted transportation plan, the PSRC’s Regional Transportation Plan, includes a NE 6<sup>th</sup> extension that terminates at 120<sup>th</sup> Ave NE. Why are these improvements included in the Downtown Transportation Plan (which has a sunset year of 2030) yet not included in full in the TFP SEIS? 3

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- Clarity:** Additionally, projects like the Bellevue Way HOV segment B & C have an X in the “TFP Network Alternative,” (page 3-38), yet don’t appear to be in the modeled results. This is the same for many projects. Were these projects included or not?
3. **Clarity:** TFP 271 (Coal Creek Parkway Roundabouts) is not included in TFP analysis, page 3-48, yet “These roundabouts are not included in the scope of the current WSDOT I-405 project, but could be pursued in the future.” WSDOT says they are a part of the 405 Bellevue to Renton ETL project, Stage 3, to come online in 2029. Why were the roundabouts not included in the analysis?
4. **Errata:** Page 3-4 shows LOS standard for Crossroads and Eastgate MMA’s as 0.09 – should be 0.90.
5. **Wilburton Growth:** The City used the Wilburton CAC/DEIS recommendation as justification for NE 6<sup>th</sup> Extension that terminates at 116<sup>th</sup> Ave NE instead of 120<sup>th</sup> Ave NE, but doesn’t include the planned growth in Wilburton as part of the DEIS. This level of growth will likely increase congestion around Wilburton and other neighborhoods. What does the transportation network look like with Wilburton growth included and why did the City incorporate the Wilburton CAC NE 6<sup>th</sup> Extension recommendation over the adopted Regional Transportation Plan’s adopted project configuration?
6. **Downtown Bikeway:** The City has made permanent a bikeway on 108<sup>th</sup> Ave NE between Main Street and NE 12<sup>th</sup> Street, per their presentation to the Bellevue Downtown Association on April 10<sup>th</sup>, 2019. Notably, the TFP SEIS shows that congestion along 108<sup>th</sup> Ave NE in this area will increase, especially to a 0.95 v/c at 108<sup>th</sup> Ave NE & NE 4<sup>th</sup> Street. Is the bikeway included in the v/c analysis or has it been omitted from the project selection? Are other planned bikeways downtown (Main Street) included or not included in the analysis?
7. **Concurrency:** The TFP SEIS shows that 37 intersections fail their current LOS standard, with three MMA’s failing the concurrency standards. Another two MMA’s are on the cusp of failing – up from 15 intersections failing and zero MMA’s failing today. Is the City going to ensure that capacity projects get completed to meet concurrency standards? Can the plan knowingly be adopted with failing MMA’s in the future?

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Thank you,

A handwritten signature in black ink, appearing to be 'BP' or similar initials, written in a cursive style.

Bob Pishue  
Transportation Director  
Kemper Development Company

## Kemper Development Company

### Response to Comments

1. The comment correctly references the adoption of "data sources" in the Fact Sheet subsection "Documents Incorporated by Reference." The Draft and Final Supplemental Environmental Impact Statement (Draft and Final SEIS) references these documents as a source of information. An EIS is not an authorization for an action, nor does it constitute a decision or a recommendation for action. The information in the referenced EIS is simply used in the preparation of the SEIS. The Wilburton EIS is useful as a source of information and is appropriately utilized as long as it is accurate, whether or not a Final EIS has been issued or a plan has been adopted by City Council. Under SEPA, WAC 197-11-635(2), material incorporated by reference (a) shall be cited, its location identified, and its relevant content briefly described; and (b) shall be made available for public review during applicable comment periods. The final TFP SEIS complies with this requirement. Further response to questions regarding the Wilburton Commercial Area Land Use and Transportation Project is provided in the Responses to Comments No. 3 and 7.
2. The comment addresses projects included in the Downtown Transportation Plan as part of the "2030 Baseline" but not included in the 2019 -2030 TFP SEIS. As stated on pages 2-1 and 2-2 of the Draft and Final SEIS, the components of the transportation planning process are as follows:
  - The Comprehensive Plan outlines the city's long-term (over 20 years) land use vision and identifies the infrastructure and services needed to support that vision.
  - The Comprehensive Transportation Project List includes projects identified in long-range facility plans, such as the Downtown Transportation Plan Update, to meet the mobility goals of a subarea.
  - The Capital Investment Program (CIP) provides a minimum 6-year period (the city adopts a 7-year CIP every 2 years) for implementation of TFP projects that are likely to be needed in the short term.
  - The Transportation Facilities Plan (TFP) serves as the city's preliminary transportation implementation plan, constrained by identified city funds and other revenues that are projected for the next 12 years.

The Downtown Transportation Plan used different criteria for their "2030 Baseline" as compared to the criteria for being fully funded in the 2019-2030 TFP. The list and map of projects in the TFP are based on the specific criteria for developing the TFP outlined in the Draft and Final SEIS. A key function of the TFP is to prioritize project needs against available funding. Many projects identified in subarea (and modal) transportation plans do not fit within the constraints of funding available in the 12-year TFP timeframe.

3. The comment questioned why the NE 6th Street extension project (TFP-211) was included in the traffic modeling for the 2030 horizon year, with a terminus at 116th Ave NE instead of 120th Avenue NE. It is assumed that primary funding for this project will come from external sources (it connects to the center express toll lanes on I-405). Including this link in the TFP transportation analysis allowed for comparison of the network performance in 2030 with the link in place (the TFP Network or "action" alternative) versus the network performance without the link in place (the CIP Network or "no-action" alternative). Because it is assumed outside funding would cover

the cost of the project, the terminus of 116th Ave NE was used, as this would address the primary interest of outside funders (providing access to I-405). City funds would likely be needed to extend NE 6th Street to 120th Ave NE. Since the Transportation Commission has not recommended funding for the extension to 120th Ave NE nor has the City Council allocated full implementation funding, there is no rationale to conduct the modeling for this project extent.

4. The comment questioned why project TFP-268, Bellevue Way HOV lane/107th Ave SE Segment B: Winters House to 112th Ave SE & Segment C: 112th to 108th Avenues SE Bellevue Way HOV Projects B and C are not funded and not modeled. Table 3-14 TFP Projects for CIP Network and TFP Network Alternatives for South Bellevue contains the footnote for this project that "Implementation funding not included in TFP, not modeled in TFP Network." That is consistent with the listing of TFP Project 268 in Table 2-1: "This project contains placeholder funding for the evaluation of the two remaining segments of the Bellevue Way SE HOV project." As stated on page 1-2, "Some included projects do not have full funding for implementation; they have placeholder funding for initial design or property acquisition and will need additional funding in subsequent TFP updates." Projects that are not funded are not presumed to be in place in the 2030 horizon year and are therefore not modeled as part of the transportation network.
5. The commenter notes that they have information from WSDOT that the Coal Creek roundabouts are now expected to be implemented in the 2025-2029 timeframe. This information was not available when the traffic network for modeling was prepared. Within the Factoria MMA in 2030, four intersections are projected to operate at a LOS level that exceeds the standard; this would be within the congestion allowance of five. If roundabouts were to be installed, the system performance is expected to improve. Therefore, not including the roundabouts in either of the 2030 alternatives provides a conservative approach in the presence of uncertainty, as is appropriate for an environmental analysis.
6. The mobility standard for the Crossroads and Wilburton MMAs has been corrected to 0.90 in the Final SEIS.
7. The comment noted that projected growth in the Wilburton Subarea was not included in modeling and asks what impacts would occur from future growth. As indicated in Section 2.1 of the Draft and the Final SEIS, the Transportation Facilities Plan process is based on the current adopted Comprehensive Plan. It would be inappropriate to include unadopted possible amendments to the Comprehensive Plan and potential additional growth from that unadopted plan in the analysis in this TFP update. The consequences of additional growth in the Wilburton Subarea, if the plan is amended, will be analyzed in environmental analysis for the subarea changes. Such changes, when adopted, would be incorporated in the TFP in the future. As is discussed in Section 3.3 of the Draft and Final SEIS, the TFP is typically updated every two to three years. The city will have multiple opportunities to update the plan before the traffic growth that may result from adoption of possible changes to the plans in the Wilburton area create transportation impacts. The NE 6th Street extension project (TFP-211) also addressed in this comment, is addressed in Comment/Response item 3, above.
8. The comment requested clarification of whether the 108th Avenue NE bikeway was included in transportation modeling and whether other bikeways downtown were included. The 108th Avenue NE bikeway was included in the analysis of the future (2030) CIP and TFP Alternatives. There are numerous bicycle facilities included in the TFP and summarized in Table 2-1. The Main Street/100th Avenue to 116th Avenue Corridor Study (TFP-234) is included for preliminary design, and potentially implement multi-modal improvements to enhance the Main Street corridor through Downtown. The potential impacts of this project on existing traffic lanes are not included in the modeling because the results of the design study are unknown at this time.

9. The comment points out the number of intersections that exceed standards and asks how the city will ensure that projects are built to meet concurrency standards. The city sets performance standards in terms of the average intersection volume/capacity ratio (v/c) within a Mobility Management Area (MMA) as a whole, along with a limit on the total number of intersections within an MMA permitted to exceed the designated standard for the given MMA. The city's Traffic Standards Code and concurrency requires review of development proposals based on traffic demand of approved pipeline projects and of the proposal being analyzed at the time of development, not at the time of the 12-year 2030 projections in the TFP. Potential strategies to address long term projections of exceeding average v/c within MMAs are identified in Section 3.3 of the SEIS, including:
- Continue to monitor compliance with transportation concurrency requirements via annual updates of the Transportation Concurrency Report.
  - Identify additional vehicle capacity improvements in updates of the TFP that will occur before 2030 conditions materialize.
  - Change LOS standards for specific MMAs if the City Council determines that meeting the current LOS standards is unfeasible and that accommodating projected development is in the public interest.
  - Change the Comprehensive Plan and zoning, if it is determined that meeting current LOS standards is in the public interest and that traffic demand could be reduced by reducing future development.