



3.4 ECOSYSTEMS

3.4.1 INTRODUCTION

This section examines existing ecosystem resources that include vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands. Existing available data was used from study reports, maps, priority species and habitats, wetland inventories, stream mapping and classification, basin study, culvert assessments, aerial photography, and limited field reconnaissance.

After describing current conditions, the impacts analysis considers how each alternative could affect ecosystem resources both within and adjacent to the Study Area. This includes the potential for direct, indirect, and cumulative impacts to vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands.

This analysis identifies significant impacts using the following threshold:

- The potential for degradation or loss of wetland, stream, or fish and wildlife habitat.

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

- Stream/lake restoration / connecting habitats
- Percent tree cover



The Mitigation section includes features of the alternatives that can mitigate adverse impacts, other City programs and regulations, other projects in the Study Area by the City or others, and ecosystem restoration or enhancements (e.g., beneficial impacts).

This analysis focuses on the Study Area defined in Section 2.2 and shown in Exhibit 2-5.

3.4.2 AFFECTED ENVIRONMENT

REGULATORY ENVIRONMENT

There are numerous existing applicable regulations intended to reduce the potential environmental impacts of development and redevelopment projects. Bellevue City Code, and State and Federal laws establish environmental regulations and procedures that affect development and use of property. These regulations are meant to ensure impacts to the environment are avoided, minimized, documented, and mitigated. Established procedures provide opportunity for public notice and comment. State Growth Management Act (GMA) identifies critical areas and requires cities to adopt development regulations to protect functions and values of critical areas based on best available science. Designated critical areas are protected from avoidable development impacts. See Mitigation Measures for a summary of applicable regulations and commitments regarding ecosystem protection.

VEGETATION AND WILDLIFE HABITAT

Vegetation and riparian habitat in the Study Area are limited and primarily associated with Lake Bellevue and short reaches of open channel along Sturtevant Creek, including a wetland located in the southwestern part of the Study Area at the intersection of 116th Avenue NE and Main Street, referred to herein as the Main Street Wetland.

The Study Area is almost entirely impervious (pavement and roofs), with tree canopy in City of Bellevue-designated critical areas such as Sturtevant Creek, the Main Street wetland, and on the steep slopes east and west of the Eastside Rail Corridor (ERC). On some streets and parcels, street trees and parking lot landscaping are visible, but are generally sparse throughout. Large, impervious parking lots associated with auto dealerships are a prominent feature in this area.



The Study Area is bisected north-to-south by the ERC. King County is undertaking a master planning process for this corridor to develop a regional trail. Because of its width, continuity, and vegetated boundaries, the ERC serves in part as a corridor for wildlife to move through portions of the area. Planned improvements to the ERC are expected to restore a trail connection over I-405 that may enhance wildlife movement and connectivity to and from Mercer Slough.

THREATENED AND ENDANGERED SPECIES

Review of the Washington Department of Fish and Wildlife (WDFW) priority species and habitats online database did not identify the known presence of priority species in the planning area. A barrier on Sturtevant Creek at the I-405 culvert prevents migration of aquatic species including salmon and trout from that point upstream. Cutthroat trout may be resident fish, and culvert barriers may not prevent their presence.

Review of the City's Critical Areas Ordinance (CAO) identifies 23 species of local importance as listed in Exhibit 3.4-1. Habitat assessments are required for permits that impact critical areas and should be conducted to assess the presence of and potential impacts to species of local importance.

Exhibit 3.4-1 City of Bellevue Species of Local Importance

1. Bald eagle (<i>Haliaeetus leucocephalus</i>)	13. Western big-eared bat (<i>Plecotus townsendii</i>)
2. Peregrine falcon (<i>Falco peregrinus</i>)	14. Keen's myotis (<i>Myotis keenii</i>)
3. Common loon (<i>Gavia immer</i>)	15. Long-legged myotis (<i>Myotis volans</i>)
4. Pileated woodpecker (<i>Dryocopus pileatus</i>)	16. Long-eared myotis (<i>Myotis evotis</i>)
5. Vaux's swift (<i>Chaetura vauxi</i>)	17. Oregon spotted frog (<i>Rana pretiosa</i>)
6. Merlin (<i>Falco columbarius</i>)	18. Western toad (<i>Bufo boreas</i>)
7. Purple martin (<i>Progne subis</i>)	19. Western pond turtle (<i>Clemmys marmorata</i>)
8. Western grebe (<i>Aechmophorus occidentalis</i>)	20. Chinook salmon (<i>Oncorhynchus tshawytscha</i>)
9. Great blue heron (<i>Ardea herodias</i>)	21. Bull trout (<i>Salvelinus confluentus</i>)
10. Osprey (<i>Pandion haliaetus</i>)	22. Coho salmon (<i>Oncorhynchus kisutch</i>)
11. Green heron (<i>Butorides striatus</i>)	23. River lamprey (<i>Lampetra ayresi</i>)
12. Red-tailed hawk (<i>Buteo jamaicensis</i>)	

Source: City of Bellevue Land Use Code 20.25H.150

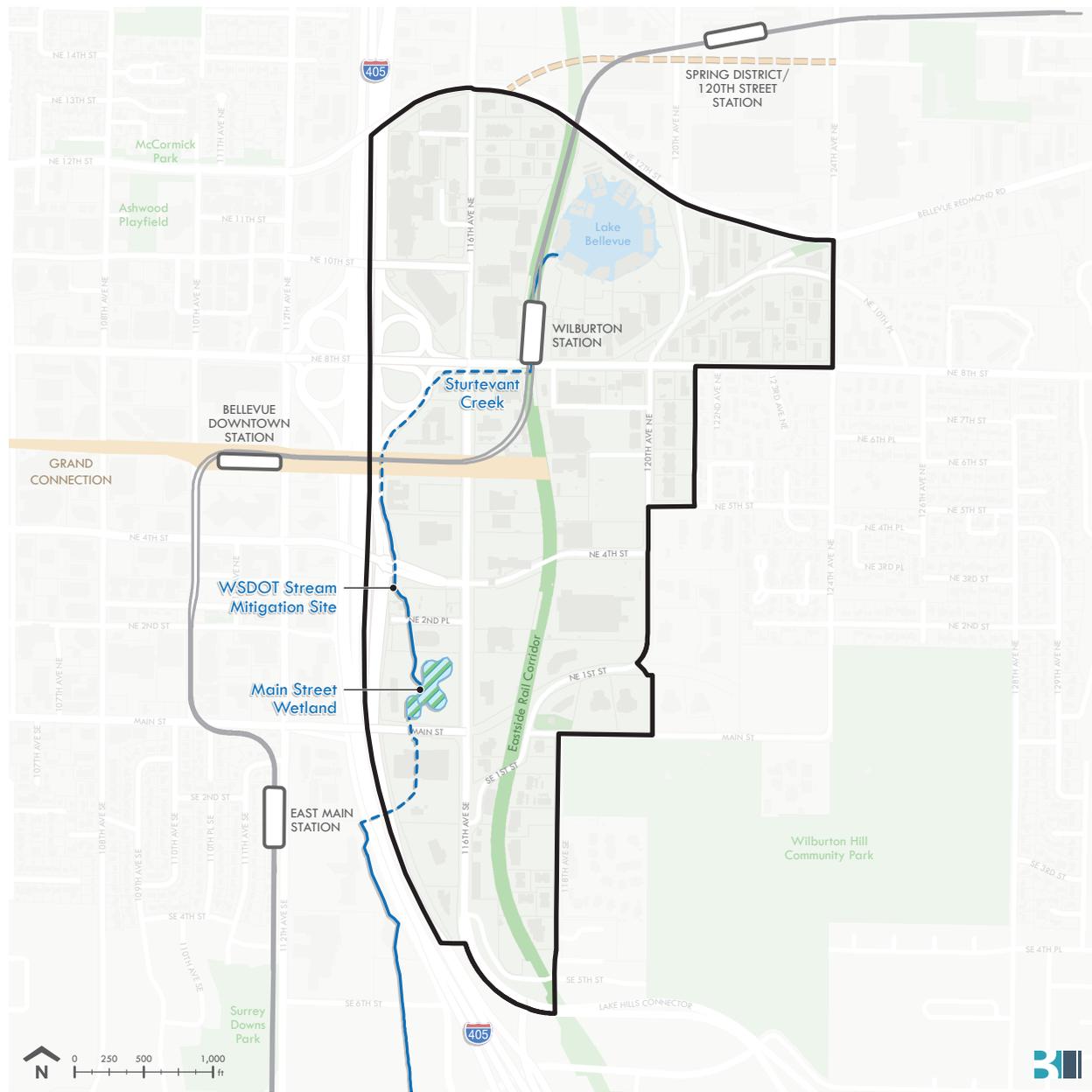


Exhibit 3.4-2 Ecosystem Resources—Lake Bellevue, Sturtevant Creek, and Main Street Wetland

Source: National Wetland Inventory, Washington State Dept. of Natural Resources, Washington State Dept. of Natural Resources, BERK, 2017

- | | |
|--------------------------------|---------------|
| Wilburton Study Area Boundary | Lake Bellevue |
| Grand Connection | Wetland |
| East Link Light Rail Stations | Piped Stream |
| East Link Light Rail Route | Open Channel |
| Spring Blvd—Under Construction | |
| Parks & Open Space | |
| Buildings | |

Note: This map illustrated mapped critical areas from readily available sources. Site-specific review may find additional unmapped critical areas, e.g. narrow riparian areas along Sturtevant Creek.



AQUATIC RESOURCES AND WETLANDS

Several sources were used to describe existing conditions of aquatic resources and wetlands in the Study Area, including the Wilburton Commercial Area Existing Conditions Report (City of Bellevue, 2016c), the East Link Project Final EIS, Appendix H3 Ecosystems Technical Report (Sound Transit, 2011c), and the I-405, NE 8th Street to SR 520 Improvement Project (WSDOT, 2008, 2017). Lake Bellevue with its perimeter fringe wetland is in the northern portion of the Study Area and forms the headwaters for Sturtevant Creek, the primary stream in the Study Area. Along Sturtevant Creek immediately south of NE 4th Street and east of the northbound off-ramp for NE 8th Street is a Washington State Department of Transportation (WSDOT) stream restoration site that provided mitigation for the I-405 Bellevue Braids project (Washington State Department of Transportation, 2017). In the southwestern portion of the Study Area is a relatively large (approximately 4-acre) depressional wetland associated with Sturtevant Creek (Main Street Wetland).

Lake Bellevue

Since the early 1940's, Lake Bellevue's watershed has experienced substantial urban development. (City of Bellevue, 2016c) The lake fringe wetlands and the lake itself have been reduced in area and the underlying peat soil deposits have been covered by impervious surfaces causing a decrease in habitat and a decline in water quality. The result is a eutrophic lake that is over-enriched with nutrients, specifically phosphorus, which promotes cyanobacteria growth, diminishing the lake's ability to support beneficial uses, including fish use. The lake has long since exhausted its resiliency or capacity to assimilate nutrients resulting in excess phytoplankton, reduced dissolved oxygen (leading to odors), high water temperature in summer, and loss of aquatic habitat.

Streams

Sturtevant Creek drains much of the Study Area. Sturtevant Creek is designated as a Type F stream, which, according to the City of Bellevue Land Use Code (LUC 20.25H.075), means "all segments of waters that are not Type S Waters, and that contain fish or fish habitat, including waters diverted for use by a federal, state, or tribal fish hatchery from the point of diversion for one thousand five hundred feet or the entire tributary if the tributary is highly significant for protection of downstream water quality."



Within the Study Area, Sturtevant Creek is approximately one mile long with roughly 60 percent having a piped or closed channel (see Exhibit 3.4-1). Sturtevant Creek originates at the southwestern end of Lake Bellevue and flows south, adjacent to the ERC for approximately 600 feet before diverting into a pipe at approximately NE 8th Street. From there, Sturtevant Creek flows generally west/southwest along the east side of I-405 in alternating segments of closed pipes and narrow open channels. Sturtevant Creek daylights again north of NE 4th Street near the City-owned Lincoln Center property at 515 116th Avenue NE, and flows south in channelized form to a culvert under NE 4th Street and then through a large wetland complex to Main Street where it flows under the Lexus site and then westward under I-405.

After it crosses westward under I-405 via two 48-inch concrete culverts, Sturtevant Creek flows south to its confluence with Kelsey Creek and Mercer Slough. I-405 is currently considered a fish passage barrier based on WDFW SalmonScape maps (Washington Department of Fish and Wildlife, 2011) and the City's basin map for Sturtevant Creek. (City of Bellevue, 2009) Even if this fish barrier were to be removed, a perched culvert between Main Street and NE 2nd Place as well as the piped sections of Sturtevant Creek north and south of NE 8th Street may also be considered fish barriers. Although there are barriers preventing fish migration, the definition of a Type F stream indicates the potential presence of fish habitat.

Wetlands

Known wetlands in the Study Area include:

- Perimeter fringe wetland at Lake Bellevue.
- WSDOT stream mitigation site along Sturtevant Creek (Washington State Department of Transportation, 2017).
- Main Street wetland (City of Bellevue, 2003).

These wetlands are further described at right.



Perimeter Fringe Wetland at Lake Bellevue

Lake Bellevue, which is approximately 10 acres in size, has a surrounding emergent and shrub fringe wetland consisting of vegetation such as water lily, cattail, bulrush, willow, and several noxious weeds (reed canarygrass and purple loosestrife).



Fringe wetland with water lilies at Lake Bellevue (H.Ehlert/CH2M)

WSDOT Stream Mitigation Site

This mitigation site consists of 200 linear feet of relocated stream channel and 0.34 acres of riparian buffer south of NE 4th Street and east of the I-405 northbound off ramp to NE 8th Street in downtown Bellevue. (Washington State Department of Transportation, 2017) This site was created to compensate for the loss of 0.04 acres of stream channel and 0.15 acres of riparian buffer due to road improvements at the I-405 and SR 520 interchange. Enhanced forested and scrub-shrub wetland areas are located on both sides of Sturtevant Creek at this site.



WSDOT stream mitigation site along Sturtevant Creek, south of NE 4th Street and east of I-405 (H.Ehlert/CH2M)

Main Street Wetland

This approximately four-acre shrub-forest-emergent depressional wetland is located at the northwestern corner of 116th Avenue NE and Main Street. Dominant vegetation consists of cottonwood, alder, willow, cattail, and reed canarygrass. Due to its size, location in the watershed, water quality functions, habitat functions, and buffer value to Sturtevant Creek, which flows through it, this wetland is likely a Category II wetland. (City of Bellevue, 2016c) The western part of the site was partially developed in the 1990s for an Extended Stay America Hotel. Recent beaver activity can be seen in and around this wetland.



Main Street wetland north of Main Street and west of 116th Avenue NE (H.Ehlert/CH2M)



No wetland ratings have been performed for these wetlands. Wetlands in Bellevue are classified into four categories (I, II, III, and IV). Currently, Bellevue relies on the 2004 rating system. However, Bellevue is in the process of adopting Washington State Wetland Rating System for Western Washington, Washington State Department of Ecology Publication Number 14-06-029, published in October, 2014 (Ecology 2014). Any future projects in the study area are anticipated to be compliant with the 2014 rating system which is described here.

- **Category I wetlands.** Category I wetlands are those that 1) represent a unique or rare wetland type; or 2) are more sensitive to disturbance than most wetlands; or 3) are relatively undisturbed and contain ecological attributes that are impossible to replace within a human lifetime; or 4) provide a high level of functions.
- **Category II wetlands.** Category II wetlands are difficult, though not impossible, to replace, and provide high levels of some functions. These wetlands occur more commonly than Category I wetlands, but still need a relatively high level of protection. Category II wetlands in western Washington include wetlands scoring between 51-69 points (out of 100) on the questions related to the functions present. Wetlands scoring 51-69 points were judged to perform most functions relatively well, or performed one group of functions very well and the other two moderately well.
- **Category III wetlands.** These are wetlands with a moderate level of functions, with scores between 30 and 50 points. They generally have been disturbed in some ways, and are often less diverse or more isolated from other natural resources in the landscape than Category II wetlands.
- **Category IV wetlands over 2500 square feet.** Category IV wetlands have the lowest levels of functions (scores less than 30 points) and are often heavily disturbed. These wetlands should be able to be replaced, and in some cases improved. However, experience has shown that replacement cannot be guaranteed in any specific case. These wetlands may provide some important functions, and also need to be protected.



Bellevue will be adopting an updated CAO in early 2018 as part of the Shoreline Master Program update. The code amendments have been approved by City Council Resolution No. 9152 and will go into effect when the Shoreline Master Plan update is approved by the Washington State Department of Ecology, which is expected in early 2018. The CAO amendments include adoption of the new wetland rating system (2014 update), as required by the Washington State Department of Ecology per BCC 20.25H and City Council Resolution No. 9152.

Wetland buffers are required to protect wetlands from adjacent development. Wetland buffer widths are based on the category and habitat score as determined in the wetland rating, as summarized in Exhibit 3.4-3.

Exhibit 3.4-3 Wetland Critical Area Buffers

CATEGORY AND WETLAND CHARACTERISTIC	BUFFER WIDTH
Category I	
Natural Heritage Wetland and Bogs– Habitat Score 8-9	225'
Natural Heritage Wetland and Bogs– All Others	190'
Forested	Based on score for habitat or water quality functions
Habitat Score of 8-9	225'
Habitat Score of 5-7	110'
Habitat Score of 3-4	75'
Category II	
Habitat Score of 8-9	225'
Habitat Score of 5-7	110'
Habitat Score of 3-4	75'
Category III	
Habitat Score of 8-9	225'
Habitat Score of 5-7	110'
Habitat Score of 3-4	60'
Category IV	
All	40'

Source: City of Bellevue Resolution No. 9152. Habitat score is based on Washington State Wetland Rating System for Western Washington, Washington State Dept. of Ecology Publication Number 14-06-029, published in October, 2014.



The wetland rating system is intended to differentiate wetlands based on:

- Sensitivity of wetland to disturbance.
- Rarity of the wetland.
- Ability to replace the wetland.
- Wetland functions provided.

If other wetlands are present in the Study Area, they have not yet been inventoried. Any proposed development would require a critical areas assessment including wetlands pursuant to federal, state, and local regulations.

Man-made wet areas in the Study Area, like the stormwater features in the interchange of I-405 and NE 8th Street, are not subject to regulations.

3.4.3 IMPACTS

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

- The potential for degradation or loss of wetland, stream, or fish and wildlife habitat.

IMPACTS COMMON TO ALL ALTERNATIVES

Short-Term and Long-Term Impacts

If City regulations and recommended potential mitigation measures are implemented, then no significant unavoidable adverse impacts are anticipated in connection with any of the alternatives.

The Study Area is generally developed and impervious surfaces are approximately 80 percent. All alternatives involve some level of redevelopment in the Study Area. Based on existing development techniques, future development and redevelopment projects would likely affect entire parcels, however protections for critical areas on redevelopment sites would apply to all the alternatives.

Numerous regulations exist to reduce the potential environmental impacts of development and redevelopment projects (see “Regulations and Commitments” below). These environmental regulations condition development proposals to first avoid or reduce potential impacts and then to mitigate impacts. The



following analysis assumes that impacts under all alternatives would arise from projects designed and implemented in accordance with all applicable regulations.

Development or redevelopment in the Study Area could result in direct and/or indirect impacts to ecosystem resources. Direct impacts within habitat areas such as reduction in wetlands or riparian areas may be less likely due to existing developed conditions in the Study Area. In addition, there are general requirements that redevelopment either meet current code/buffer standards or provide an equivalent or better level of critical area functions than with application of the code standards. This would apply under all the alternatives and would result in incremental improvements to critical areas and habitat as properties redevelop.

In addition, many of the existing developments within the Study Area are likely nonconforming to critical area buffers—especially Sturtevant Creek. Redevelopment of nonconforming sites could require either meeting current buffer standards or demonstrating equivalent or better critical area functions if not meeting the required buffer, especially for wetlands and open sections of stream. There is likely to be some level of incremental improvement to buffers and critical area functions with redevelopment on sites with critical areas, applicable under all alternatives.

Impacts to upland habitat would be less than significant due to the limited existing distribution and quality of such habitat in the Study Area. The side slopes along the ERC offer habitat value and a corridor for wildlife movement and connection to other habitats within and adjacent to the Study Area. See sideslopes in the steep slope maps in Section 3.1. The ERC will provide a recreation space and retain pervious landscaped areas like the sideslopes; equaling about 8.6 acres. See Section 3.3.

No impacts to wetlands are currently anticipated. Potential impacts to Sturtevant Creek may result from redevelopment proposals such as widening existing roads and/or constructing new road crossings. If such impacts to wetlands and/or stream were proposed to occur, they would be subject to the avoidance, minimization, and mitigation requirements set forth in federal and state laws and in the City's CAO. These regulatory requirements are sufficient to reduce potential impacts to wetlands such that residual impacts would be less than significant.



Some projects could affect riparian habitat and would be subject to mitigation provisions of the City's CAO; compliance with those provisions would reduce residual impacts to a less-than-significant level.

Indirect impacts on habitat areas result from actions taken outside of the habitat areas. Redevelopment projects in the Study Area could have indirect impacts on aquatic habitat as a result of increased pollutant loading in stormwater runoff, described above in the water resources section. Currently, due to the high existing impervious surface coverage, almost all stormwater generated in the Study Area is conveyed to Sturtevant Creek; a small portion infiltrates to groundwater, is taken up by plants, or evaporates. New low-impact development requirements would increase on-site infiltration of stormwater, thereby reducing the amount currently conveyed to Sturtevant Creek

Opportunities may arise to consider daylighting sections of Sturtevant Creek that are currently in a pipe in the Study Area, and restoring riparian functions. Redevelopment plans may provide ecological benefits from creating an open-channel water feature on properties, particularly if the existing pipes do not currently allow fish passage. Redevelopment plans that trigger impacts to streams or wetlands may trigger the need to comply with fish passage requirements.



PERFORMANCE MEASURES EVALUATION

As described in the Introduction, there are two performance standards for Ecosystems, shown in Exhibit 3.4-4 along with a summary of how each alternative performs. Following the Exhibit is an explanation of each standard.

Exhibit 3.4-4 Evaluation Framework: Comparison of Alternatives–Ecosystems

PERFORMANCE MEASURE	NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2
Stream/lake restoration/connecting habitats	▼	●	●
Percent of tree cover	▼	●	●

▲ Strong Emphasis ● Moderate Emphasis ▼ Weak Emphasis

Stream/Lake Restoration/Connecting Habitats

The No Action Alternative would not fully achieve the performance measures for stream and lake restoration and connecting habitats. With the greater density and visions for the neighborhood under Alternatives 1 and 2, there is a greater potential to restore the stream, lake, and wetland systems and habitats.

Impacts to critical areas from redevelopment may trigger stream, wetland, and/or lake enhancement restoration. As stated above, there is likely to be some level of incremental improvement to buffers and critical area functions with redevelopment on non-conforming sites with critical areas. In order to affect a system level improvement, the City could provide policies, concept plans, and incentives to promote stream daylighting or lakeshore enhancement such as through allowing increased density that could be transferred or relocated elsewhere onsite or in the neighborhood. Additional voluntary improvements may further enhance overall aesthetic quality of the redevelopment and of the overall neighborhood.

Performance Measure



Performance Measure

Percent of Tree Cover

The No Action Alternative does not have the same potential to increase tree cover because the Grand Connection is not included. The No Action Alternative also does not have the same transportation network assumptions, and the level of development is lower which likely translates into fewer opportunities and impact mitigation for new trees in the Study Area.

The Grand Connection options and Public Space options in Alternatives 1 and 2 would include new opportunities for tree cover. In addition, street grid improvements would likely include streetscape improvements that would add street trees and increase tree cover in the area. It is also anticipated that additional landscaping and tree plantings would be required with new development resulting in an increase in tree cover. This could be accomplished through incentives for open or public space. However, given the proposed densities the opportunities to greatly increase tree cover would be limited to distinct areas of open space, streetscapes, and the landscaping in new development.

Performance Measures Evaluation– Grand Connection

The most relevant performance standard for the Grand Connection is constructability, including challenges that Grand Connection options may encounter in relation to the ecosystem conditions and the development pattern proposed by Alternatives 1 and 2.

No constructability challenges for ecosystem resources are anticipated for the No Action Alternative because the Grand Connection would not be constructed.

Constructability challenges for ecosystem resources for Alternatives 1 and 2 may vary depending on which Grand Connection option is selected. For example, Grand Connection Option B (Linear Bridge) would occur where Sturtevant Creek is mostly within a culvert, and less likely to increase constructability challenges because construction may not disturb the culverted stream. Working in, over, or near a stream or its buffer could cause constraints for construction and timing (e.g., in-water work restrictions). Opportunities to restore stream and riparian habitat by daylighting sections of Sturtevant Creek that are currently in a pipe could



possibly occur after other improvements are completed to minimize constructability challenges and possible impacts to the stream.

Grand Connection Options A (Sculptural Bridge) and C (Lid Park) may affect a greater length of Sturtevant Creek that is in an open channel (between NE 4th and NE 6th Streets), which could increase constructability challenges. Despite the potential short-term constructability challenges, long-term benefits to ecosystem resources could result from enhancements to Sturtevant Creek.

IMPACTS OF THE NO ACTION ALTERNATIVE

There are no additional impacts beyond those identified under Impacts Common to All Alternatives.

Because the Grand Connection would not be constructed for the No Action Alternative, no beneficial cumulative impacts to ecosystem resources are anticipated.

Beneficial cumulative impacts to portions of the natural network could result if the City parks plan recommendation for a neighborhood park were implemented and if some natural features were integrated, such as those identified in ERC Linear Park or Natural Network Public Space Options for the No Action Alternative.

IMPACTS OF ALTERNATIVE 1

Beneficial cumulative impacts to portions of the natural network could result from the combination of the Grand Connection and ERC Linear Park or Natural Network Public Space Options for Alternative 1. These could include opportunities to improve the natural network by enhancing, daylighting, and utilizing the natural systems such as Lake Bellevue, riparian wetlands and uplands, and Sturtevant Creek as amenities, and incorporating native vegetation into landscaping.

IMPACTS OF ALTERNATIVE 2

Beneficial impacts are the same as described for Alternative 1.



3.4.4 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

Beneficial impacts to the natural network would result from the Grand Connection for Alternatives 1 and 2.

REGULATIONS AND COMMITMENTS

There are numerous existing applicable regulations intended to reduce the potential environmental impacts of development and redevelopment projects that would apply to all the alternatives. Bellevue City Code, and State and Federal laws establish environmental regulations and procedures that affect development and use of property. These regulations are meant to ensure impacts to the environment are avoided, minimized, documented, and mitigated. Established procedures provide opportunity for public notice and comment. Certain areas are designated as environmentally sensitive or “critical areas” that are protected from avoidable development impacts. Within the Study Area, the principal existing regulations that protect ecosystem resources include the following:

- **Federal Clean Water Act.** Federal review applies to any project affecting waters of the United States and thus requiring review by the U.S. Army Corps of Engineers. Such projects commonly must show that impacts have been minimized (including endangered species and cultural resources), and permit requirements often include mitigation for unavoidable impacts.
- **State of Washington Laws Pertaining to Waters of the State.** State review applies to any project affecting waters of the state and thus requiring review by Ecology and/or WDFW. Such projects also must show that impacts have been minimized and permit requirements often include mitigation for unavoidable impacts.
- **Bellevue Critical Areas Ordinance (CAO).** Critical areas are parts of the landscape afforded special protection because they provide unique environmental functions that are difficult, if not impossible, to replace. Bellevue’s CAO protects six types of critical areas: Streams and riparian areas, wetlands, habitats for species of local importance, geological hazard areas, flood hazard areas, and shorelines. Buffers and structure setbacks are



then applied to the edges of these critical areas to protect their functions and values.

- **Stormwater Regulations.** The City ensures development complies with stormwater standards as described in the water resources section above.
- **Bellevue Comprehensive Plan.** Through land uses permits, the City ensures project compliance with environmental policies identified in the Comprehensive Plan.
- **Environmental Health Regulations.** The Model Toxics Control Act of the State of Washington sets forth prescribed limits of contamination that must be addressed by any disturbance, based on the type of activity and proposed use for a parcel. The standards for voluntary cleanup for lower levels of contaminants are incorporated into new development or redevelopment parcels that have been noted to have contamination potential.

These environmental regulations condition development proposals to avoid, minimize, and/or mitigate potential impacts. However, residual impacts commonly remain. For example, an area of upland wildlife habitat may not be protected if it does not qualify for protection under other regulations.

OTHER PROPOSED MITIGATION MEASURES

- Mitigation measures would be developed as needed on a case-by-case basis related to specific redevelopment projects to comply with applicable federal, state, and City permitting requirements.
- The City may select a public space concept for the Study Area per Chapter 2. This would provide opportunities to improve the natural network by enhancing, exposing, and utilizing the natural systems such as Lake Bellevue, riparian wetlands and uplands, and Sturtevant Creek as amenities.
- Development that incorporates native vegetation into landscaping would also be desirable.



3.4.5 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With the implementation of mitigation measures, no significant unavoidable adverse impacts on ecosystem resources are anticipated. Any direct or indirect impacts to critical areas would be avoided or mitigated by current regulations as noted under Mitigation Measures. With redevelopment under Alternatives 1 and 2, there is an opportunity to both avoid impacts to critical areas and to enhance natural systems.