

2021 Annual Final Review Comprehensive Plan Amendment Recommendation  
Council-initiated Amendments

**Transportation Recommendations**

**Staff recommends the Planning Commission approve** these proposed Comprehensive Plan Amendments because the applications satisfy Land Use Code decision criteria for Final Review of a City Council-initiated Comprehensive Plan Amendment.

*Multimodal Concurrency: Concur with the Transportation Commission recommendation to amend the Transportation Element to embed policies that support a multimodal approach to transportation concurrency.*

*Comprehensive Transportation Project List: Repeal the Comprehensive Transportation Project List (CTPL) and replace it with the Transportation Improvement Plan.*

**Application Number:** 21 107724 AC

**Proposal:** Policy amendments and repeal of the Comprehensive Transportation Project List

**Elements:** Transportation Element, CTPL in Volume 2

**Subarea Plans:** Citywide

Final Review is normally the second step in Bellevue's two-part plan amendment review process. Proposed amendments initiated by the City Council go straight to this step, as the Council's decision to initiate validates the proposal as worthy of plan amendment consideration. Final Review evaluates the merits of proposed amendments included in the annual Comprehensive Plan Amendment work program. Final Review evaluation and decision includes staff review, a Planning Commission public hearing and recommendation by resolution, and City Council action by ordinance. The City Council initiated the Transportation related amendments on April 5, 2021.

**PROPOSAL**

**Multimodal Concurrency:** After three study sessions, culminating on June 10, 2021, the Transportation Commission voted 5-1 to approve policy recommendations to support multimodal concurrency.

**Comprehensive Transportation Project List:** Staff recommends repealing the Comprehensive Transportation Project List (CTPL) and replace it with the Transportation Improvement Plan.

Work Program

On April 5, 2021, the City Council initiated the transportation amendments to the Transportation Element and to repeal the Comprehensive Transportation Project List. The Transportation Commission prepared a recommendation to repeal existing policy, amend existing policy or to add new policy to the Transportation Element to embed a multimodal approach to transportation concurrency. Staff has prepared a recommendation to repeal the Comprehensive Transportation Project List from Volume 2 of the Comprehensive Plan and to use the Transportation Improvement Program as the citywide inventory of transportation projects.

**OVERVIEW OF STAFF RECOMMENDATION**

These proposals satisfy the Final Review Decision Criteria for a Comprehensive Plan Amendment:

- ✓ The proposed amendment is **consistent with the Comprehensive Plan:**

*Transportation Element: Comprehensive Plan policy TR-30 provides direction to implement a multimodal approach to transportation concurrency.*

*“Establish multimodal level-of-service and concurrency standards and other mobility measures and targets for transportation corridors and in each area of the city in consideration of planned development patterns and mobility options.”*

The Transportation Commission has worked since this policy was adopted in 2015 to prepare a foundation for multimodal concurrency, including the [Multimodal Level-of-Service Metrics, Standards and Guidelines Report](#) approved in 2017.

*Comprehensive Transportation Project List: Created in 2015 in the major update of the Comprehensive Plan, the CTPL consolidated nearly 800 transportation projects from subarea plans and transportation facility plans. To add, change or repeal a CTPL project requires a Comprehensive Plan amendment. Staff recommends the Transportation Improvement Program (TIP) to replace the CTPL as the “inventory” of all transportation projects. The TIP is updated annually with a Transportation Commission recommendation (after study sessions and a public hearing) and City Council adoption. The TIP project list is the first step toward implementation through the financially constrained Transportation Facilities Plan and full project funding in the Capital Investment Program Plan.*

- ✓ The proposed amendment **addresses the interests and changed needs of the entire city:**

*Transportation Element: A multimodal approach to transportation concurrency considers all the modes of transportation to determine if the projects that will provide the “supply” of mobility is adequate to accommodate the demand for mobility from new development. Both transportation system “supply” and land use “demand” are forecast for a 12-year period in the Transportation Facilities Plan. In this plan, transportation projects are identified and prioritized for funding in the Capital Investment Program Plan. The transportation system supply is drawn down by the demand with the issuance of a building permit. It is in the interest of the city to match supply and demand with a diverse portfolio of transportation projects because people rely on more than one mode of transportation to get around the city, depending in part on the purpose of the trip, the destination and the time of day. Therefore, a complete network of all modes helps to provide access for everyone.*

*Comprehensive Transportation Project List: An up-to-date transportation projects list that includes the most recently approved projects in the interest of the entire city. The project list in the Transportation Improvement Program are required to be updated annually, thus it reflects the most current transportation planning and engineering work. To be eligible for most outside funding, a project must be adopted in the TIP, and it is in the interest of the city to supplement local funding to more expeditiously implement planned projects.*

- ✓ The proposed amendment **addresses significantly changed conditions (since the last time the pertinent map or text was amended):**

*Transportation Element: Population and employment growth in Bellevue have changed – and are anticipated – circumstances that a multimodal approach to concurrency addresses. In the existing vehicle approach to concurrency, transportation system capacity is expanded with intersection and arterial projects that address only the vehicle demand. In an increasingly diverse and dense city, projects of all modes must be embedded in regulatory concurrency to ensure that complete and connected networks are built concurrent with demand from growth. Policies to support a multimodal concurrency standard will replace the vehicle-focused concurrency policies embedded in the Transportation Element. This is a component of the Transportation Commission’s ongoing work to prepare a Mobility Implementation Plan as directed by the City Council.*

*Comprehensive Transportation Project List: In 2015, the creation of the CTPL in Volume 2 of the Comprehensive Plan was an essential step to consolidate all transportation projects that had been adopted into various sections of the Comprehensive Plan. The Transportation Improvement Program now creates the most current inventory of transportation projects and it essentially duplicates the CTPL, yet it is refreshed annually and thus is responsive to the changed circumstances that occur with each planning study, engineering evaluation, or transportation corridor analysis.*

- ✓ The proposed amendment **demonstrates a public benefit** and **enhances the public health, safety and welfare**:

*Transportation Element: A multimodal approach to concurrency will match the “demand” for mobility from new development with the “supply” of transportation facilities to ensure that projects for all modes are identified, prioritized and implemented to support planned growth. This will create an increasingly diversified portfolio of transportation projects to meet the diverse needs of residents, employees and visitors to Bellevue. Recommended goals and policies speak to the effort to consider equity, environmental sustainability and fiscal sustainability in the process to scope, plan, design, build, operate and maintain transportation projects.*

*Comprehensive Transportation Project List: The Transportation Improvement Plan is updated annually, through a public process and recommendation from the Transportation Commission. The TIP is a benefit to the community in that the projects reflect the most current planning and they are eligible for outside funding.*

## **BACKGROUND**

On April 5, 2021, the City Council initiated annual Comprehensive Plan Amendments regarding multimodal concurrency and the Comprehensive Transportation Project List.

Transportation Element: On January 4, the City Council approved a consultant contract and scope of work for a Mobility Implementation Plan (MIP). The MIP is envisioned as the planning document that will articulate a multimodal approach to mobility in Bellevue. The MIP will broaden the City’s vehicle-focused transportation concurrency standard to define a multimodal approach. Within the MIP, the Transportation Commission will define transportation system Performance Metrics and Performance Targets for all modes. A multimodal approach to concurrency will match the “demand” for mobility from new development with the “supply” of transportation facilities to ensure that projects for all modes are identified, prioritized and implemented to support planned growth. On April 5, the City Council initiated a Comprehensive Plan amendment with direction to embed multimodal concurrency policy in the Transportation Element. After three study sessions, culminating on June 10, the Transportation Commission voted 5-1 to approve policy recommendations to support multimodal concurrency.

- Transportation Commission Policy Recommendation

Washington state law, through the Growth Management Act (GMA) (RCW 36.70A), requires local jurisdictions to ensure the planned transportation system will accommodate planned land use. This requirement is called “concurrency”. Rather than prescribe a universal approach, the GMA allows jurisdictions to describe and establish a transportation concurrency standard to reflect the community vision for land use, mobility and other factors. Further, the Washington Administrative Code (WAC 365-196-840) provides guidance for implementation to jurisdictions that pursue a multimodal approach to concurrency.

Policies in the Transportation Element provide direction on Bellevue’s approach to transportation concurrency. The existing suite of policies describes the long-standing vehicular level-of-service standard that defines the performance of the transportation system. The multimodal approach will also consider

the performance of the system for people walking, riding a bicycle, or taking transit. During study sessions, the Transportation Commission reviewed existing policy and made a determination to edit or repeal policies, or to add policies as needed to create the policy support for multimodal concurrency.

**Comprehensive Transportation Project List:** The Comprehensive Transportation Project List (CTPL) was developed by the Transportation Commission as part of the 2015 update to the Comprehensive Plan. The six transportation facility plans and several subarea plans that were in Volume 2 of the Comprehensive Plan contained 781 transportation projects – since these lists were so old and had not been updated, many of the projects were completed, outdated, redundant, conflicting with one another, or inconsistent with current land use planning objectives. Subsequent transportation planning – for example, the Downtown Transportation Plan and the Eastgate Transportation Study – added new projects to the CTPL through amendments to the Comprehensive Plan. The consolidation of these project lists in 2015 was the mechanism to repeal completed or outdated projects, and to eliminate redundancies and conflicts that existed between the project descriptions in different plans. Now that all the projects have been consolidated and the CTPL is up to date, this project list may be moved outside of the Comprehensive Plan to the Transportation Improvement Program (TIP) for which a required annual update keeps the TIP project list current. On April 5, the City Council initiated a Comprehensive Plan Amendment to repeal the CTPL.

- **Transportation Improvement Program**

The Transportation Improvement Program (TIP) is the project inventory for the local transportation system. In most instances, projects must be included on the Bellevue TIP to be eligible for state and federal grants.

Unlike the Capital Investment Program Plan and the revenue-constrained 12-year Transportation Facilities Plan, the Bellevue TIP is not "revenue constrained," nor is the list of projects prioritized. The City may include all projects that it would choose to implement within the six-year time frame if funding was available. Projects are typically created and vetted through long-range planning with the community that is focused on a specific geographic area such as a subarea or a transportation corridor.

The TIP is required by state law (RCW 35.77.010), a mandate for local jurisdictions to annually adopt and submit to the state a six-year program of transportation improvements. The state Department of Transportation and the Puget Sound Regional Council (PSRC) use local TIPs to coordinate the transportation programs of local jurisdictions with those of regional agencies. The PSRC monitors local TIPs for projects of regional significance, which are modeled for regional air quality conformity with federal standards, and to track projects supported by federal funds.

- **TIP Annual Update**

Each year, the Transportation Commission recommends a TIP to the City Council. To prepare its recommendation, the Commission considers that some projects have been completed (these are recommended to be deleted) some projects have been identified through long-range planning (these are recommended to be added - an example is the Eastgate Transportation Study), and some project descriptions are changed through further planning and engineering. The Transportation Commission conducts study sessions and holds a public hearing before making a final recommendation to the City Council. This process occurs in Q1 through Q3 of each year, so the project list in the TIP stays current. The Transportation Commission held a public hearing on the update to the TIP on April 8. The Council adopted the 2021 TIP on May 10, Resolution No. 9932.

The TIP project list essentially duplicates the CTPL, however the TIP is more responsive to changed circumstances because it is updated annually. In contrast, to update the CTPL requires an amendment to

the Comprehensive Plan – a process that may be done annually, but that requires several additional steps, including initiation by the City Council, studies and a recommendation from the Transportation Commission, and study sessions, public hearing and recommendation from the Planning Commission. Because of this extra process to amend the Comprehensive Plan, that in the end creates a duplicate project list, staff recommends repealing the CTPL and using the TIP as the one aggregated transportation project list for Bellevue.

**FINAL REVIEW DECISION CRITERIA**

The Final Review Decision Criteria for a proposed Comprehensive Plan amendment are set forth in the Land Use Code in Section 20.30I.150. A proposal must meet all of the criteria to be recommended for approval. Based on the criteria, staff recommends **approval** of the proposed amendments:

Final Review Decision Criteria	Meets/Does Not Meet
A – Obvious technical error	N/A
B1 – Consistent with Plan and other plans and law	Meets
B2 – Addresses interests and changed needs of entire city	Meets
B3 – Addresses significantly changed conditions	Meets
B4 – Could be suitably developed	Meets
B5 – Demonstrates a public benefit	Meets

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 such plans, goals, and policies of the city and of the CPP, the GMA, and other applicable law.*

*Transportation Element: The proposed amendment to the Transportation Element is consistent with the Comprehensive Plan because it provides a comprehensive policy framework to articulate the multimodal approach to transportation concurrency, as described in the existing direction from policy TR-30: “Establish multimodal level-of-service and concurrency standards and other mobility measures and targets for transportation corridors and in each area of the city in consideration of planned development patterns and mobility options”. The multimodal approach supports the completeness, connectedness, and resiliency of Bellevue’s transportation system and affirms Bellevue’s existing commitment to provide safe and reliable mobility options for people wherever they need to go throughout the city, whether they are walking, riding a bicycle, taking transit, or driving a car.*

**Countywide Planning Policies**

*Transportation Element: The proposed amendment is consistent with the overall intent of the King County Countywide Planning Policies (KCCPP) to provide for an “efficient transportation system that provides multiple options for moving people and goods.” The Countywide Planning Policies also recognize that “Mobility is necessary to sustain personal quality of life and the regional economy. For individuals, mobility requires a connected and complete transportation system that provides*

safe, reliable, and affordable travel options for people of all ages, incomes and abilities.” Note the Countywide Planning Policies are being updated in 2021 in advance of the 2024 update to the Comprehensive Plan. Specific KCCPP policies that address multimodal mobility include the following:

- **Policy T-9:** Promote the mobility of people and goods through a multi-modal transportation system based on regional priorities consistent with VISION 2040 and local comprehensive plans.
- **Policy T-12:** Address the needs of non-driving populations in the development and management of local and regional transportation systems.
- **Policy T-21:** Provide opportunities for an active, healthy lifestyle by integrating the needs of pedestrians and bicyclists in the local and regional transportation plans and systems.

Comprehensive Transportation Project List: N/A

- **Policy T-1:** Work cooperatively with the Puget Sound Regional Council, the state, and other relevant agencies to finance and develop a multi-modal transportation system that enhances regional mobility and reinforces the countywide vision for managing growth. Use VISION 2040 and Transportation 2040 as the policy and funding framework for creating a system of Urban Centers and Manufacturing/ Industrial Centers linked by high-capacity transit, bus transit and an interconnected system of freeways and high-occupancy vehicle lanes.
- **Policy T-8:** Prioritize regional and local funding to transportation investments that support adopted growth targets.

### **Growth Management Act**

*Transportation Element: In its policy recommendation for the Transportation Element, the Transportation Commission approved the term “multimodal-level-of-service concurrency standard” to define the new standard for concurrency:*

*Recommended New Policy A. Employ a citywide multimodal level-of-service concurrency standard that provides transportation facilities that meet the demand from new development.*

*This approach is consistent with the Growth Management Act requirements for jurisdictions to adopt a performance (level-of-service) standard and to adopt ordinances to enforce the standard. While the GMA is clear that a jurisdiction must define a concurrency standard and to deny a development application if the standard is not met, the law allows broad flexibility to a community to define concurrency. Each jurisdiction may develop a methodology that is best suited to its unique context. In fact, the GMA emphasizes the following goal, which is based in part on Bellevue’s efforts in 2009 to reshape Washington’s transportation concurrency practices:*

*“Transportation concurrency should encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.”*

*The state legislature recognizes that a prescriptive one-size-fits-all definition of level-of-service and concurrency will not meet the diverse needs of communities across the state. Given the local autonomy to address concurrency under the GMA framework, several jurisdictions have taken an explicitly multimodal approach to define a level-of-service/concurrency standard that meets the GMA requirements and reflects local priorities. In Redmond, for example, the city developed a “plan-based” concurrency level-of-service standard in 2009. Under this approach, Redmond commits to build out its multimodal transportation plan (which includes roadway, transit, pedestrian, and bicycle improvements) at a pace that is ahead of the planned growth in the*

community. Also, between 2012 and 2020, Kirkland, Kenmore, and Olympia adopted similar plan-based concurrency level-of-service standards.

*Comprehensive Transportation Project List: The proposed amendment is consistent with GMA transportation planning goals that encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans. The Transportation Improvement Program is the link between transportation projects in Bellevue and the regional system.*

**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**

*Transportation Element: Washington state law, through the Growth Management Act (GMA), requires local jurisdictions to ensure the planned transportation system will accommodate planned land use. Rather than prescribe a universal approach, the GMA allows jurisdictions to describe and establish the transportation concurrency metrics and standards. In the Transportation Element of the Comprehensive Plan, policies provide direction on transportation concurrency and define the metrics and standards the City uses. Existing policy describes a vehicular approach to define the performance of the transportation system. A multimodal approach would consider the performance of the system for people walking, riding a bicycle, or taking transit.*

*The Transportation Commission previously identified metrics, standards, and guidelines for all modes - in the Multimodal Level-of-Service Metrics, Standards and Guidelines (MMLOS) report in 2017. Through ongoing work on the Mobility Implementation Plan/Multimodal Concurrency the Transportation Commission has prepared a recommendation for a multimodal approach to concurrency and is defining the Performance Metrics, Performance Targets and Performance Management Areas for each mode. The recommended policy amendments expand the definition of transportation concurrency to include all modes, thus Transportation Element policy amendments are needed to implement multimodal concurrency. The Transportation Commission believes that policy amendments address the changed and changing needs of the community as it grows in both jobs and housing.*

*Comprehensive Transportation Project List: Within the Comprehensive Plan, the CTPL is up to date, and now this project list may be moved outside of the Comprehensive Plan to the Transportation Improvement Program (TIP) for which a required annual update keeps the TIP project list current. This approach will streamline the process to keep an inventory of transportation projects by eliminating the annual CPA through the legislative process*

*Each year, the Transportation Commission recommends an updated TIP to the City Council. To prepare its recommendation, the Commission considers that some projects on the list have been completed (these are recommended to be deleted) some new projects have been identified through long-range planning (these are recommended to be added (an example is the Eastgate Transportation Study), and some project descriptions are changed through planning and engineering work that supersedes the existing project description. The required annual update is presented for a public hearing before the Commission makes a final recommendation. This process occurs in Q1 through Q3 of each year, so the project list in the TIP stays current.*

**B3. The proposal 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:"**

**Significantly changed conditions.** Demonstrating evidence of change such as 1) unanticipated consequences of an adopted policy, or 2) changed conditions on the subject property or its surrounding area, or 3) 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); and

*Transportation Element: Population and employment growth in Bellevue have changed – and are anticipated – circumstances that a multimodal approach to concurrency addresses. In the existing vehicle approach to concurrency, transportation system capacity is expanded with intersection and arterial projects that address only the vehicle demand. In an increasingly diverse and dense city, projects of all modes must be embedded in regulatory concurrency to ensure that complete and connected networks are built concurrent with demand from growth. Policies to support a multimodal concurrency standard will replace the vehicle-focused concurrency policies embedded in the Transportation Element. This is a component of the Transportation Commission’s ongoing work to prepare a Mobility Implementation Plan as directed by the City Council.*

*Comprehensive Transportation Project List: In 2015, the creation of the CTPL in Volume 2 of the Comprehensive Plan was an essential step to consolidate all transportation projects that had been adopted into various sections of the Comprehensive Plan. The Transportation Improvement Program now creates the most current inventory of transportation projects and it essentially duplicates the CTPL, yet it is refreshed annually and thus is responsive to the changed circumstances that occur with each planning study, engineering evaluation, or transportation corridor analysis.*

- 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**

*Not applicable to this proposal.*

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

*Transportation Element: A multimodal approach to transportation concurrency will diversify the portfolio of transportation projects to meet the demand from new growth. This approach will deliberately endeavor to create a complete and connected transportation network for all modes within the City’s control that is envisioned as being equitable and sustainable.*

*Comprehensive Transportation Project List: To repeal the CTPL from the Comprehensive Plan and replace it with an inventory of transportation projects maintained in the Transportation Improvement Program is more responsive to community planning work, creates eligibility for outside funding, and provides for the coordination of transportation projects with neighboring jurisdictions and the region.*

## **PUBLIC NOTICE AND COMMENT**

The 2021 annual proposed Comprehensive Transportation amendments were introduced to the Planning Commission with an April 14, 2021, study session highlighting the work associated with the proposed plan amendments and a June 23<sup>rd</sup> study session which included a recommendation from the Transportation Commission.

Notice of the Application was published in the Weekly Permit Bulletin on June 10, 2021 and mailed and posted as required by LUC 20.35.420. Notice of the July 28, 2021, Final Review Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on July 1, 2021, and included notice sent to parties of interest.



**Effective community engagement, outreach, and public comments at Final Review**

Applicants, residents, and communities are engaging across a variety of media in proactive public participation during the 2021 annual review process. The city's early and continuous community engagement includes tools and occasions to provide and respond to public information and engagement.

Public comments come in throughout the process. All comments written and oral are included in the public record, for reference and for use by decision-makers. At the various steps, the comments are included in their original form to the Planning Commission as attachments to staff report recommendations. They are also posted on the web site.

**ATTACHMENTS**

- A. Transportation Element Concurrency Policy Table