

2026 Annual Final Review Comprehensive Plan Amendment Recommendation
Council-initiated Amendment

Transportation Element Conformance

Staff Recommendation: Staff recommend approving the proposed Transportation Element Conformance Comprehensive Plan Amendment as the application satisfies all Land Use Code decision criteria for Final Review.

Application Number: 26-106401-AC

Proposal: Transportation Element Conformance

Elements: Transportation Element, Glossary, and Introduction and Vision section

Subarea Plans: Citywide

PROPOSAL

Amendments to the Comprehensive Plan may be initiated by the city or by private individuals. Pursuant to the Growth Management Act (GMA), the Bellevue City Code at Part 20.301 Land Use Code (LUC) permits the City Council to initiate Comprehensive Plan Amendments (CPAs) at any time and provides a one-step process for review (Final Review) by the Planning Commission and consideration for approval by Council. Final Review evaluates the merits of proposed amendments included in the annual CPA work program. Final Review evaluation includes staff review, a Planning Commission public hearing and recommendation by resolution, and City Council action by ordinance.

Transportation Element Conformance (26-106401-AC)

On March 10, 2026, City Council initiated this proposed CPA to incorporate limited amendments to the Comprehensive Plan, most importantly the Transportation Element, to ensure conformance between the Comprehensive Plan and two transportation-related functional plans.

On November 25, 2025, the City Council adopted both the Mobility Implementation Plan (MIP) 2025 Update, incorporating and also superseding all prior City of Bellevue Pedestrian and Bicycle Transportation Plans, and the 2026-2045 Transportation Facilities Plan (TFP). As noted in the Council agenda materials, the Transportation Department would initiate and recommend a conformance amendment to the Comprehensive Plan in 2026 following the adoption of the 2025 update. As prior Pedestrian and Bicycle Plans are now fully incorporated into the MIP, which is the document that includes all mobility options (including walking and bicycling) within the city, the proposed conformance amendments seek to amend policy TR-96 and to delete non-policy narrative references to the Pedestrian and Bicycle Transportation Plan in the Comprehensive Plan. The proposed conformance amendments also seek to remove additional references to the Pedestrian and Bicycle Transportation Plan elsewhere in the Comprehensive Plan, specifically the Introduction and Vision section and Glossary.

On November 25, 2025, City Council also adopted the 2026-2045 TFP, extending its timespan from 12 to 20 years. The TFP serves as the city's intermediate-range, transportation capital facility planning document and functions as a bridge between the MIP, long-range facility plans, modal plans, and the five funded projects in the Capital Improvement Program (CIP) Plan. The proposed conformance amendments seek to amend non-policy narrative references in the Transportation Element to the prior 12-year TFP timespan.

The Transportation Commission reviewed the staff recommended policy and narrative amendments to the Transportation Element on March 12. On May 14, the Transportation Commission recommended the proposed amendments and approved a transmittal memo to the Planning Commission.

OVERVIEW OF STAFF RECOMMENDATION

Staff recommend approving this proposed amendment because the application meets Land Use Code decision criteria for Final Review per LUC 20.30.150. In particular, the following decision criteria are met:

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	N/A
B5 – Demonstrates a public benefit	Meets

FINAL REVIEW DECISION CRITERIA

A proposal must meet all Final Review Decision Criteria to be recommended for approval. Staff have concluded that the proposal meets all decision criteria. This conclusion is based on the following:

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.

The proposed amendment does not encompass any substantive changes to existing goals and policies. The proposed amendment seeks to incorporate limited amendments to the Transportation Element to ensure conformance between the Comprehensive Plan and the recently updated Mobility Implementation Plan (MIP) and Transportation Facilities Plan (TFP), as well as references to those plans elsewhere in the Comprehensive Plan.

Those functional plans provide details and implementation specifics for transportation policy outlined in and consistent with the Comprehensive Plan. Concretely, Comprehensive Plan Transportation Element policy TR-28 supports the MIP 2025 Update:

TR-28. Engage the community to evaluate and modify the Mobility Implementation Plan as needed, in concert with each periodic update of the Comprehensive Plan, or as warranted by changed circumstances.

City Council adopted the MIP 2025 Update, incorporating and also superseding all prior City of Bellevue Pedestrian and Bicycle Transportation Plans, on November 25, 2025. The MIP is already fully incorporated into the Comprehensive Plan.

Various policies in the Capital Facilities and Transportation elements of the Comprehensive Plan provide a framework for the City's periodic update of the TFP in compliance with the requirements of the Growth Management Act and the Multimodal Concurrency Code, including TR-30:

TR-30. Plan for and prioritize transportation system projects to support land use and to address Performance Target gaps in each update of the Transportation Facilities Plan.

On November 25, 2025, City Council adopted the 2026-2045 TFP, extending its timespan from 12 to 20 years. Extending the TFP to 2045 also put it into alignment with the Comprehensive Plan's time horizon, reinforcing the relationship between the vision for land use and transportation.

B2. The proposed amendment addresses the interests and changed needs of the entire city as identified in its long-range planning and policy documents; and

The proposed amendment addresses the interests and changed needs of the entire city as it ensures conformance between the Comprehensive Plan and specific transportation-related functional plans, offering details and implementation specifics to meet the need for transportation facility improvements for all modes in line with the Comprehensive Plan.

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 for the definition of "Significantly Changed Conditions"; and

Significantly Changed Conditions. Demonstrating evidence of change such as unanticipated consequences of an adopted policy, or changed conditions on the subject property or its surrounding area, or changes related to the pertinent plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole.

The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan text was amended in 2024 as part of the Comprehensive Plan Periodic Update. Both the MIP 2025 Update and the 2026-2045 TFP were adopted by City Council since then. This proposed amendment seeks to ensure conformance between the Comprehensive Plan and these two recently updated transportation-related functional plans, allowing the Comprehensive Plan to function as an integrated whole.

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.

The proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare as it ensures conformance between the Comprehensive Plan and specific transportation-related functional plans, allowing the Comprehensive Plan to function as an integrated whole.

PUBLIC NOTICE AND COMMENT

The Transportation Commission reviewed the staff recommended policy and narrative amendments to the Transportation Element on March 12. On May 14, the Transportation Commission recommended the proposed amendments and approved a transmittal memo to the Planning Commission. In addition to the Transportation Element amendments recommended by the Transportation Commission, staff recommended removing additional references to the Pedestrian and Bicycle Transportation Plan elsewhere in the Comprehensive Plan. Planning Commission reviewed the Transportation Commission and staff recommended amendments to the Comprehensive Plan at the June 10 meeting.

Notice of the application was published in the Weekly Permit Bulletin on [April 15, 2026](#), and mailed and posted as required by [LUC 20.35.420](#). Notice of the Final Review Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on July 1, 2026, and the Seattle Times and included notice sent to parties of record.

Public comments received during the Final Review process are included in the public record and posted on the [Comprehensive Plan Amendments webpage](#). No comments were received to date.

ATTACHMENTS

A. Comprehensive Plan - Proposed Conformance Changes

Comprehensive Plan – Proposed Conformance Changes

Element	Policy	Existing Language	Reason for Change
Introduction and Vision	N/A (p. IV-5, call out box)	FUNCTIONAL PLANS Bellevue has several plans that provide details and implementation specifics for policy areas in the Comprehensive Plan. These functional plans are updated more frequently than the Comprehensive Plan. The plans listed below are plans that the City maintains. The Shoreline Master Program is adopted as an element of the Comprehensive Plan. There are other plans that impact the implementation of the Comprehensive Plan maintained by other agencies such as King County and the Bellevue School District. ▪ Affordable Housing Strategy ▪ Diversity Advantage Plan ▪ Economic Development Plan ▪ Environmental Stewardship Plan ▪ Fire Department Strategic Plan ▪ Human Services Needs Update ▪ Mobility Implementation Plan ▪ Parks and Open Space System Plan ▪ Pedestrian and Bicycle Transportation Plan ▪ Police Department Strategic Plan ▪ Recreation Program Plan ▪ Storm and Surface Water System Plan ▪ Transit Master Plan ▪ Transportation Facilities Plan ▪ Wastewater System Plan ▪ Water System Plan ▪ Watershed Management Plan	Conformance with the Mobility Implementation Plan.

Element	Policy	Existing Language	Reason for Change
Transportation	N/A (p.TR-3, narrative)	To ensure that getting around Bellevue on foot is easy and safe, and that bicycling facilities accommodate riders of all ages and abilities, Bellevue implements and maintains a network illustrated and described in the Pedestrian and Bicycle Transportation <u>Mobility Implementation</u> Plan. This plan includes policies, design standards and a comprehensive and prioritized project list. The Mobility Implementation Plan defines Performance Targets for each mode that describes the intended user experience and <u>that</u> serves to identify and prioritize needed investments.	Conformance with the Mobility Implementation Plan.
Transportation	N/A (p.TR-3, call out box)	PEDESTRIAN AND BICYCLE TRANSPORTATION <u>MOBILITY IMPLEMENTATION PLAN</u> The Pedestrian and Bicycle Transportation <u>Mobility Implementation</u> Plan articulates a shared vision for walking and bicycling in Bellevue. The plan <u>Mobility Implementation Plan</u> identifies where the intended performance of the network does not meet the adopted targets so that project concepts can be developed more than 400 projects that, when funded, would <u>to</u> make biking and walking in Bellevue safer and easier.	Conformance with the Mobility Implementation Plan.
Transportation	N/A (p.TR-4, call out box)	TRANSPORTATION FACILITIES PLAN (TFP) Typically updated every two to three years, the TFP is a “financially constrained” plan meaning the identified cost of the projects in the TFP must be balanced with the city’s transportation revenue projections for the 1220 -year plan period. Some projects listed in the TFP include funding allocations for initial development or partial implementation only.	Conformance with the Transportation Facilities Plan.

Element	Policy	Existing Language	Reason for Change
Transportation	N/A (p.TR-7, call out box)	COMPLETE STREETS Performance Measures. Performance is measured against adopted Performance Targets in the <u>Mobility Implementation Plan</u> , and mode-specific plans, including the Pedestrian and Bicycle Transportation Plan and the Transit Master Plan.	Conformance with the Mobility Implementation Plan.
Transportation	N/A (Map TR-5)	Map TR-5. Pedestrian Facilities This map shows existing sidewalks, multi-purpose paths and trails that comprise the existing pedestrian network in Bellevue. Please refer to the Bellevue Pedestrian and Bicycle Transportation <u>Mobility Implementation Plan</u> for <u>a map of arterial pedestrian network Performance Target gaps and a list of trail projects</u> that would add to existing facilities.	Conformance with the Mobility Implementation Plan.
Transportation	N/A (Map TR-6)	Map TR-6. Bicycle Facilities This map shows existing bicycle lanes, shared shoulders, wide lanes, shared lanes and multi-purpose paths that comprise the existing bike network in Bellevue. Please refer to the Pedestrian and Bicycle Transportation <u>Mobility Implementation Plan</u> for <u>a map of arterial bicycle network Performance Target gaps and a list of trail projects</u> that would add to existing facilities.	Conformance with the Mobility Implementation Plan.
Transportation	TR-96	TR-96. Implement the Pedestrian and Bicycle Transportation Plan and e <u>Evaluate, describe, and prioritize projects concepts</u> that address Performance Target gaps through the Mobility Implementation Plan.	Conformance with the Mobility Implementation Plan.

Element	Policy	Existing Language	Reason for Change
Glossary	N/A (p. GL-2)	Bicycle Route — A route specifically designed and designated for bicycle travel, whether exclusively for bicyclists or to be shared with other transportation modes. Refer to the Pedestrian and Bicycle Transportation <u>Mobility Implementation</u> Plan for the various types of bicycle facilities that may be employed to create a bicycle route.	Conformance with the Mobility Implementation Plan.
Glossary	N/A (p. GL-2)	Bicycle System Plan Map — A map in the Pedestrian and Bicycle Transportation <u>Mobility Implementation</u> Plan, that depicts the plan for a complete and connected network of bicycle routes serving the entire community that is compatible with and connected to regional and interjurisdictional facilities.	Conformance with the Mobility Implementation Plan.
Glossary	N/A (p. GL-10)	Pedestrian System Plan Map — In the Pedestrian and Bicycle Transportation <u>Mobility Implementation</u> Plan, a map that depicts a complete and connected network of pedestrian facilities that serve the entire community and are compatible with regional and inter-jurisdictional facilities. Pedestrian facility types are defined and described in the Pedestrian and Bicycle Transportation Plan.	Conformance with the Mobility Implementation Plan.