



May 13, 2015

Nicholas Matz, Senior Planner
 City of Bellevue - Planning & Community Development
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Subject: PSRC comments on draft Bellevue Comprehensive Plan update

Dear Nicholas,

Thank you for providing an opportunity for the Puget Sound Regional Council to review draft elements of the City of Bellevue Comprehensive Plan. We recognize the substantial amount of time and effort invested in this plan and appreciate the chance to review it while in draft form. This timely collaboration helps to ensure certification requirements are adequately addressed and certification action can be taken by PSRC boards upon adoption.

We would like to note the many outstanding aspects of the draft, which represents a thorough review, update, and streamlining of the required plan elements. Several particularly noteworthy aspects include:

- Emphasis on growth and planning for the downtown regional growth center, specifically through establishing clear growth targets, mode split goals, and directing transportation investments to support the growth strategy. Establishing targets in other portions of the city also establishes clear understanding of future growth patterns in the city.
- Excellent goals and policies that emphasize the city's role in enabling and supporting high quality transit service to meet needs for future growth.
- Robust goals and policies that emphasize resiliency and planning for emergency response.
- Housing element policies and goals that provide clear direction to the preservation and rehabilitation of housing, as well as establishing specific goals and policies to support housing for residents with special needs. Commitment to preservation will extend the useful life of existing affordable housing stock.
- Developing a clear and accessible plan that addresses complicated issues with plain language that communicates implications for this planning work. The city's approach to the plan document is a model for how to address requirements and clearly present information for residents and decision-makers.

The draft Bellevue Comprehensive Plan advances regional policy in many important ways. There are a few items, however, that the city should consider before the plan is finalized:

- The City of Bellevue is commended for affirmatively planning for a significant share of the county's growth, as called for in the regional growth strategy (RGS) in VISION 2040, as well as for extending land use assumptions beyond adopted countywide growth targets to cover a 20-year planning period that ends in 2035. We recommend reviewing Figure LU-2 and more clearly documenting how the targets have been applied to planning period by showing growth since 2006 and showing how targets have been extended from 2031–35.
- The transportation element should identify state and local system needs to meet current and future demands, along with a multiyear financing plan (RCW 36.70A.070(6)(F)). While the city has separately developed a 12-year Transportation Facilities Plan and intends to complete a Transportation Master Plan over the next year, the city should include or incorporate by reference a project list in the transportation element to meet future demands. [WAC 365-196-430\(2\)\(g\)\(ii\)](#) recommends that jurisdictions should identify system needs consistent with the traffic forecasting period (i.e. 20 years). More information on identifying system needs is outlined in Commerce's [Transportation Guidebook](#).
- The multicounty planning policies in VISION 2040 and the strategies in Transportation 2040 call for reducing greenhouse gas emissions and adapting to impacts related to climate change. While the plan

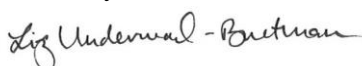
already includes a goal to establish a citywide target and identify corrective actions, the draft plan could be strengthened by addressing other climate change MPPs, such as adding provisions for developing and implementing transportation modes and technologies that are energy-efficient and improve system performance (MPP-T-6).

- Per RCW 36.70A.070(6)(a)(iii)(A), the map of 2030 transit alignment in the city (TR-7) should be supplemented with an with inventory of existing transit alignments.
- VISION 2040 and Transportation 2040 address special needs transportation planning (see MPP-T-25). The city should include discussion and policy language that more explicitly addresses mobility for people with special transportation needs, including persons with disabilities, the elderly, youth, and low-income populations.
- MPP-DP-54 and 55 call for addressing transportation concurrency on the movement of people and goods instead of only on the movement of vehicles, both in assessment and mitigation. The plan includes policies to establish multimodal level-of-service standards adequate to ensure a functional transportation system. This could be strengthened by including an expected timeline or approach for implementation.
- As a signatory to the Growing Transit Communities (GTC) Regional Compact, the City of Bellevue has an opportunity to demonstrate a commitment in its comprehensive plan to promoting thriving and equitable transit-oriented development. PSRC has developed a [memo](#) that provides guidance on comprehensive plan updates to Compact signatories, including recommendations to identify transit station areas, establish transit community goals, and adopt policies and provisions that advance the GTC strategy.
- The policies in the draft housing element go a long way to advancing VISION 2040's housing goals. HO-25 appears to rely on future work—the development of a housing strategy—to address affordable housing needs in Bellevue. The city should consider including additional discussion in the housing element implementation table of the content of housing strategy plan, including detail on the timeline for adoption and update.
- The city is commended for working to increase housing opportunities in the downtown regional growth center. As a major employment center and a location with high levels of existing and future regional transit service, downtown Bellevue can play a key role in the city providing sufficient affordable housing choices along with greater access to local and regional opportunities. For these reasons, and as guided by MPP-H-5, the draft plan update would be strengthened with more detail on housing needs, goals, and strategies that address extremely-low, very-low and low-income households.
- The city has multiple policies and provisions addressing the multicounty planning policies on meeting the long-term water needs of the region. This work would benefit by expanding it to include promoting the use of water reclamation and reuse, where feasible, as called for by MPP-PS-8. See VISION 2040, p. 93.

PSRC has resources available to assist the city in addressing these comments. Additional resources related to the plan review process can also be found at <http://www.psrc.org/growth/planreview/resources/>.

Thank you again for working with us through the plan review process. There is a lot of strong work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information regarding the review of local plans or the certification process, please contact me at 206-464-6174 or LUnderwood-Bultmann@psrc.org.

Sincerely,



Liz Underwood-Bultmann
Associate Planner, Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce