



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?
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 2nd to five lanes between Bellevue Way and 112th Ave NE
 - b. A NE 6th Street extension across I-405 to 120th Ave NE
 - c. New ramps to/from east @ 124th Ave NE on SR 520
 - d. Bellevue Way SE HOV lane from 112th Ave SE to the South Bellevue Park and Ride

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

Yet, in the 2019-2030 TFP DSEIS: TFP-190 (NE 2nd widening), TFP-217 (124th Ave NE at SR 520), TFP-268 (Bellevue Way HOV Segment B: Winters House to 112th 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 6th Street extension) now states the extension will terminate at 116th, and not 120th. The region’s adopted transportation plan, the PSRC’s Regional Transportation Plan, includes a NE 6th extension that terminates at 120th 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?

Kemper Development Company
575 Bellevue Square, Bellevue, WA 98004
P (425) 454.2431 F (425) 646.3661

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 6th Extension that terminates at 116th Ave NE instead of 120th 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 6th Extension recommendation over the adopted Regional Transportation Plan’s adopted project configuration?
6. **Downtown Bikeway:** The City has made permanent a bikeway on 108th Ave NE between Main Street and NE 12th Street, per their presentation to the Bellevue Downtown Association on April 10th, 2019. Notably, the TFP SEIS shows that congestion along 108th Ave NE in this area will increase, especially to a 0.95 v/c at 108th Ave NE & NE 4th 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?

Thank you,

A handwritten signature in black ink, appearing to be 'BP' with a long, sweeping tail stroke.

Bob Pishue
Transportation Director
Kemper Development Company