



November 10, 2022

City of Bellevue
Transportation Commission
450 110th Avenue NE
Bellevue, WA 98004

RE: Public comment regarding 2024 CPPU proposed language changes to the transportation element

Commissioners,

Kemper Development Company (KDC) provides the following comments in response to the City's proposed policy changes to the Transportation Element of its Comprehensive Plan. We oppose some of the City staff proposed changes to existing TR policies and have outlined immediate concerns below.

Existing TR-27 – Monitor traffic growth on collector arterials and take measures to keep volumes within reasonable limits.

- **City Staff Proposal:** Strike language.
- **KDC Recommendation:** Retain language as is.
- **KDC Comment:** The existing policy language directs the City to take measures to keep traffic volumes within reasonable limits. If the City monitors traffic volumes but does not take measures to control such volume except “possibly in the context of Neighborhood Traffic Safety Programs,” there should be greater accountability in place to make sure they do take those measures per TR-27. Eliminating policy language because the City has failed to honor its direction is the wrong approach. The existing policy is in the public interest by providing traffic data and requiring the City to take steps to keep traffic volumes within reasonable limits. This policy should remain.

Existing TR-28 - Employ a citywide multimodal level-of-service concurrency standard that provides transportation facilities that meet the demand from new development.

- **City Staff Proposal:** Employ a citywide multimodal concurrency standard that provides a supply of transportation facilities that meets the demand from new development.
- **KDC Recommendation:** Retain language as is, with addition of “supply” only.
- **KDC Comment:** The City reasoning states that the change only added “supply” per the Multimodal Concurrency Code. However, the change also removed “level of service,” the reasoning for which was omitted and should be provided as well. Multimodal Level of Service is an important performance standard for congestion relief and functional roadway facilities, and should be retained given that congestion relief remains a City priority and goal, and is in the public interest.

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Existing TR-33 - Plan for transportation system projects to accommodate the forecast demand and to meet Performance Targets in each update of the Transportation Facilities Plan.

- **City Staff Proposal:** Plan for and prioritize transportation system projects to address Performance Target gaps in each update of the Transportation Facilities Plan.
- **KDC Recommendation:** Retain language as is.
- **KDC Comment:** A data-driven approach of accommodating forecast demand and meeting performance targets should remain the priority. Softening the language to direct officials to simply “address performance target gaps” is less active and less measurable, and therefore makes it difficult to hold officials accountable for failure to accommodate forecast demand. If the City wishes to “address performance target gaps,” they should do so separately or in addition to the policy of accommodating forecast demand to “meet performance targets,” which are a critical metric and cannot be dismissed.

Existing TR-43 - Provide an arterial system, and encourage the state to provide a freeway system, that together support local and regional mobility and land use plans.

- **City Staff Proposal:** Encourage the state to preserve and sustain an integrated multimodal transportation system, including freeways, that supports local and regional mobility and land use plans.
- **KDC Recommendation:** Retain language as is.
- **KDC Comment:** Retain language directing the City to *provide* an arterial system, and retain language *connecting* the arterial system to the freeway system, which “together support local and regional mobility and land use plans.” The reasoning provided for removing the arterial system language is not a sufficient explanation for the change, as TR-1 and TR-3 do not address the City’s responsibility to provide an arterial system, nor the interdependent nature of the arterial and freeway system. The City must provide and maintain an arterial system that effectively moves traffic. We suggest keeping the current policy as is, and creating a separate policy encouraging the state to preserve and maintain an integrated multimodal transportation system, including freeways.

Existing TR-52 - Minimize visual distractions, extraneous objects, and excessive clutter along arterials.

- **City Staff Proposal:** Strike language.
- **KDC Recommendation:** Retain language as is.
- **KDC Comment:** The reasoning provided by the City for this suggested change is that the policy language is “subjective and does not assign implementation responsibility.” This is not a sufficient explanation. Numerous other broad, subjective policy statements without implementation responsibility remain in the transportation element and are not found to be equally problematic. Further, the policies are intended to be broad and less prescriptive, so there is no need to assign implementation responsibility in the policy language itself. On content, minimizing clutter (for example, excessive tactical urban design elements), along arterials is a worthwhile effort. If the language is too subjective in the sense that it doesn’t identify what the visual distractions or extraneous objects are, that should be identified to make the policy adequately objective. The solution may be to improve the language, not strike it altogether.



Existing TR-120 - Support high-capacity transit facilities and service on I-90, I-405, and SR-520 that will accommodate anticipated transit ridership.

- **City Staff Proposal:** Support high-capacity transit facilities and service on I-90, I-405, and SR-520.
- **KDC Recommendation:** Retain language as is.
- **KDC Comment:** Retain language that connects transit facilities and service to the accommodation of transit ridership. The purpose of high-capacity transit is to accommodate anticipated use, and elimination of that language removes an essential metric for determining the quantity and frequency of transit. Tracking transit ridership, and promoting adjustments of service accordingly, should be a policy priority.

Existing TR-136 - Support means to reduce transportation-source greenhouse gas emissions.

- **City Staff Proposal:** Support means to reduce per capita transportation-source greenhouse gas emissions.
- **KDC Recommendation:** Strike language/policy.
- **KDC Comment:** It is not possible to accurately calculate or enforce city-wide transportation-related emissions as people cross jurisdictional boundaries. In light of existing statewide policy, this policy is redundant and meaningless. One might also argue that the policy language is “subjective without clear implementation responsibility” and on that basis alone should be removed.

Existing TR-147 - Balance the needs of all roadway users when designing and building neighborhood traffic safety projects.

- **City Staff Proposal:** Consider the needs of all roadway users when designing and building neighborhood traffic safety projects.
- **KDC Recommendation:** Retain the language as is.
- **KDC Comment:** The reasoning provided for changing “balance” to “consider” is that “policy statements are never really clear how to do the balancing.” This reasoning is insufficient. Policy statements are never really clear how to do the “considering” either. However, “balance” suggests a degree of objective analysis and action, while “consider” suggests a thought to the issue without any responsibility to do anything about it. We recommend retaining the policy as is.

Thank you for your consideration.

Sincerely,

Mariya Frost
Director of Transportation
Kemper Development Company