



City of
Bellevue Post Office Box 90012 ▪ Bellevue, Washington ▪ 98009

September 19, 2024

Ms. Kandice Kwok
JYOM Architects
440 15th Street
San Diego, CA 92101
Kandice.kwok@jyomarchitects.com

**RE: Pinnacle Bellevue North
Project #: 21-103195-LD; 21-103192-LP
Revision Request #6**

SENT VIA EMAIL AND MYBUILDINGPERMIT.COM

Dear Ms. Kwok:

The Development Review Committee (DRC) has reviewed the plans submitted on July 15 - 16, 2024 for the Administrative Design Review, file number 21-103195-LD and Master Development Plan, file number 21-103192-LP. Below are additional comments and revision requests from the City's review team. **Please note that additional information may be requested as a result of our review of your resubmittal.**

The City review team continues to find inconsistencies in the architectural, landscape and civil plans, as well as plans that are unreadable due to file formatting. Many of the items you will find listed below are repeat comments, some of which were provided in Revision Request 4, sent on May 11, 2023. Despite our efforts to assist your team in preparing a set of plans that can be approved by setting up multiple meetings to answer your questions prior to your current resubmission, we are finding a lack of attention to details and quality control of information provided on the plans, and inconsistencies in what was verbally conveyed to us versus what is shown on your plans.

The review comments below have been color-coded, as follows:

1. Repeat comments not addressed by current revision.
2. *New comments based on revised plans, requested to clarify how you meet the code requirements (blue italic text).*
3. **New comments based on revised plans wherein city codes have been provided previously but continue to be ignored.**
4. **New comments based on revised plans where information provided is still incorrect.**

City approval cannot be granted with this level of inconsistency and lack of information for a project of this size.

If you would like to meet to discuss any of the following comments prior to resubmitting, please let me know and I can schedule a virtual meeting. You are also welcome to reach out directly to any reviewer listed below for clarification on their comments. In your next resubmittal to the City, please ensure that you provide a response to every revision comment in one consolidated comment response letter.

General: For best practice in preparing plans, we would like to see the following level of thought and care in your submittal to aid us in understanding the information you provided for us to review:

1. Repeat comment: All drawings must be simplified to only provide the applicable information that needs to be reviewed. For example, your Landscape Plans should not show residential units at the same level as the plazas. We know there are no residential units on the plaza levels, and you provided information on the plans that are not only confusing but are inaccurate.
New comments:
 - a. Landscape Plans show stairs in plazas. It appears these stairs are on upper floors. There were no stairs shown in last revision. See Sheets LA-100.
 - b. Remove all the red gridlines on the A1 sheets. They detract from our ability to review the relevant information.
2. Repeat Comment: Remove unflattened viewports on all plans that need to be reviewed by the Fire Department. See attached Fire Department marked up plans. The plan sheets are still unreadable; therefore, the Fire Department reviewer could not complete their review and provide substantive review comments to your project.
 - a. Flatten the architectural plans. It is very difficult to review your plans because every time we pan, scroll or zoom, the plan reloads, and it has slowed us down significantly in finishing our review of your plans.

Department comments are as follows:

#21-103195-LD – DESIGN REVIEW

Land Use

Staff Contacts: Amy Tarce, (425) 452-2896, atarce@bellevuewa.gov

The following is a short list of significant items that are necessary for approval or were erroneously shown on your plans consistently. Please refer to the marked up Architectural Plans, Landscape Plans and other documents attached to this letter for a comprehensive understanding of Land Use review comments. Many of these are “clean up” in nature, but there are some that are still not clear, and we cannot approve a project of this size without feeling confident that the plans are clear to ensure compliance with the Land Use Code and a successful project as it moves to construction.

General

1. **Departure Request for “A” Right-of-Way on NE 10th Street, specifically for weather protection. The departure request response for the “A” Right-of-Way was erroneously described as a departure request for Build-to-Line. The response is also not clear as to what standard is requesting departure from. This departure request is not for the Build-to-Line. It’s for the ROW design standards, specifically the weather protection on NE 10th Street not meeting the 75% requirement and weather protection on 102nd Ave. NE not located over the sidewalk. Clarify that the project is providing a marquee on NE 10th that does not meet the standards for weather protection as defined in the LUC but provides a comparable function. Clarify what section of the weather protection along 102nd Ave. NE is not over the sidewalk. See marked up Departure Request (attached).**
 - b. Repeat comment: Update the dimensional tables to keep consistent with any changes to the FAR. Be sure to cross check these dimensional tables with the

plan set to ensure consistency as we move toward project approval and note the plan sheet where we can find the dimensional information in the set. The FAR and dimensional requirements numbers in the architectural plans were not updated to match the approved FAR dimensional tables that Laurie Tyler has approved (see attached Approved FAR and Dimensional Table). Refer to mark-ups on the attached Dimensional Table and architectural plans sheets A0.63, A0.28, A0.50, A0.51, A0.61, A0.62, A0.63, A0.64, A0.71, A0.72, A0.73, A2.01, and A2.02.

Parking

1. Tandem parking numbers do not match the tandem parking spaces shown on your plans. See architectural plan sheets A1.02 and A1.03.

Green and Sustainability Factor (Sheet LA 404)

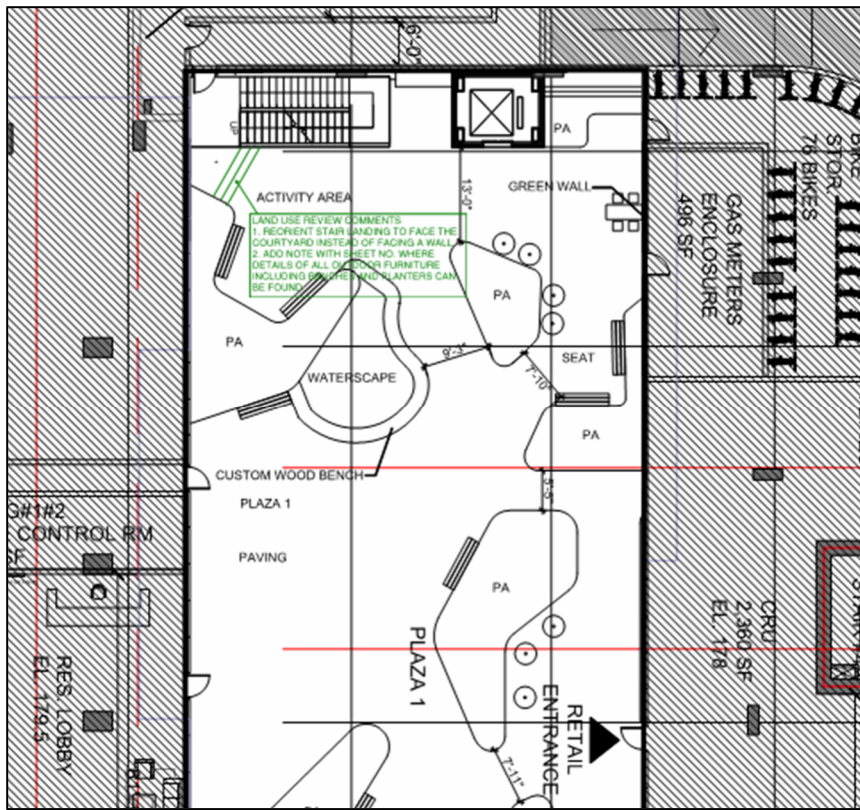
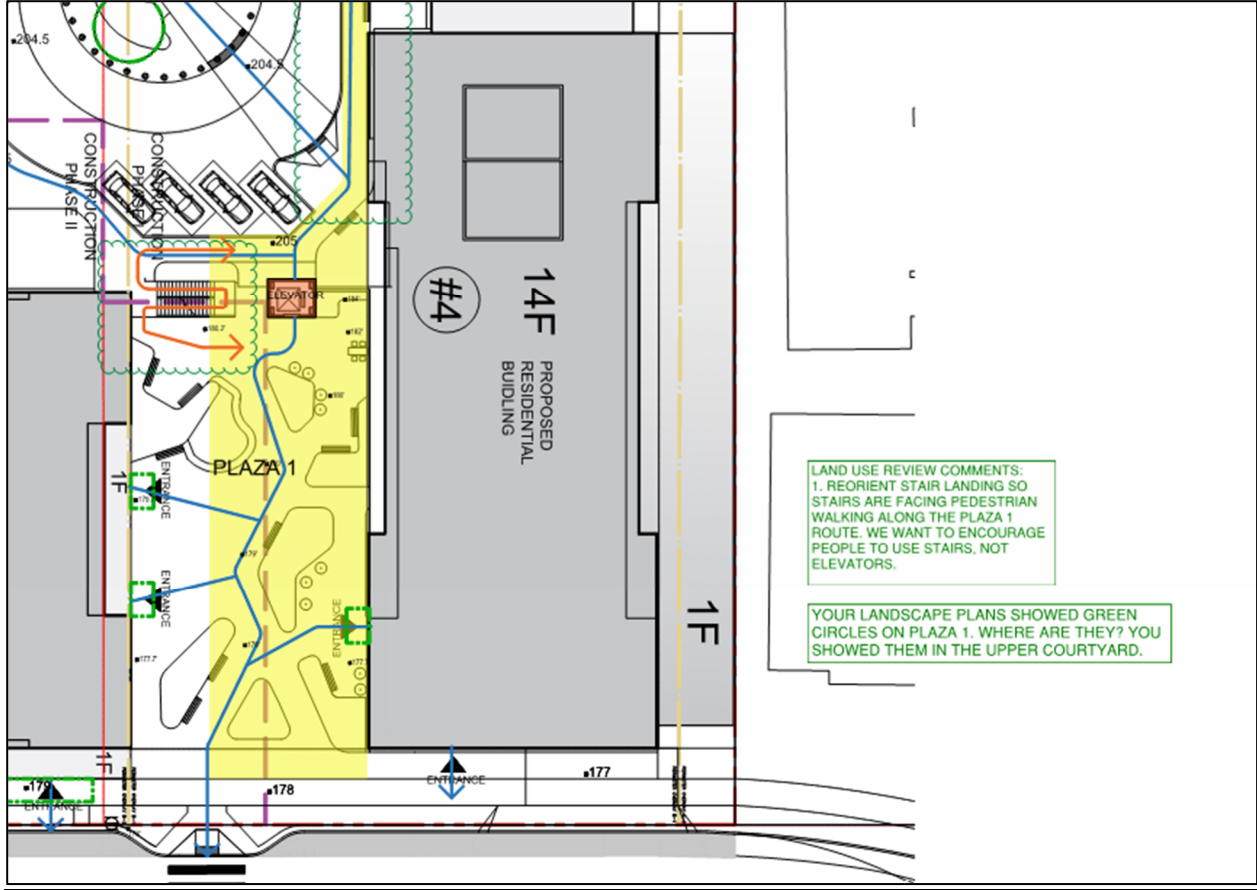
1. On the Plant Schedule landscape plan sheets, identify which plants are being used to meet your Green and Sustainability Factor. The total number of plants shown on the Plant Schedule for meeting the Green and Sustainability Factor must clearly match the total numbers on the Green and Sustainability Factor Worksheet.

Landscape

1. Repeat Comment: Sheet LA-100-Site Plan: Highlight in green the extent of the site plan used for plaza area. Demonstrate how your plazas meet the design criteria for outdoor plazas found in LUC Chart 20.25A.070.D.4, "Outdoor Plaza".
 - a. Required seating. Show the dimensions in linear feet for each seating used to meet the required length of seating for the Outdoor Plaza.
2. Clarify which wall is intended as Graphic Wall, Media Wall or Green Wall. Sheet A0.27 information does not match your Landscape Plans. Your Landscape Plans label the wall at the Outdoor Plaza on NE 10th as Graphic Wall in some sheets and Green Wall in detailed Landscape Plan sheet. Similarly, the Media Wall in the Outdoor Plaza on 102nd Ave. is labeled as Green Wall in some of the Landscape Plan sheets.

Outdoor Plaza

1. Repeat Comment: Provide a revised plaza design that shows the expansion to meet the minimum 10% square footage. See Landscape Plan sheets for detailed comments pertaining to the design criteria for outdoor plaza.
2. Repeat Comment: Reorient stair landing so stairs are facing pedestrian walking along the plaza 1 route. We want to encourage people to use stairs, not elevators. (see mark ups on Sheets LA-202-East Plaza and A0.22 of 9/14/2023 submittal set). You do not have to reorient the entire stair but you can add an intermediate landing at the lower level at the wall, similar to what you have now, but add 3 or more steps that face the outdoor seating.



Parks Department Comments

1. Trees and soil volume:
 - a. Repeat comment: Please confirm placement of a tree in the bulb-out bed on the southern end of the 102nd Ave NE planter strip. Based on soil cell placement and soil volume worksheet, it seems that tree was intended for this location it is missing from many of the landscape sheets.
 - b. Soil volume can only be calculated up to 50' distance from center of tree. There are a few soil cells placed beyond this distance that will not be accessible-these should be moved into an area closer to the tree. Double rows of soil cells are acceptable.
 - c. Soil volume does not appear to be met for the northern-most tree on 102nd. You can only calculate open soil for the areas of the planter that are within 50' of tree.
 - d. Repeat Comment: There are inconsistencies between Architectural plan and Civil plan in tree placement along 102nd Ave NE. Civil set is missing the northern most tree.
 - e. Tree placement is also not consistent between landscape pages, Architectural pages and green factor pages. Green factor calculations are taking credit for a tree on the south end of the 102nd planter strip that does not show on landscape pages (except LA-102). Sheet LA 402 is missing the northern tree.
2. Landscape:
 - a. Please add some variety to the plant material in streetscape planters. These are very long stretches of single plant species. Consider adding some punctuation of grasses or perennials for interest. We are happy to suggest low grasses or other material that have proven successful in streetscapes in Bellevue.
 - b. We have grown Erica successfully, but do not have experience with Daboecia in streetscapes. Do you have any local examples of where you have grown this plant successfully in a streetscape or similar setting?
 - c. Mahonia repens is called as a groundcover along NE 10th St. planter, but given the ultimate size of Mahonia and the very full planting, it's unclear where these plants will be installed. It would be helpful to see as symbols on plan rather than groundcover hatch.
 - d. Gaultheria procumbens requires shadier conditions and will be too delicate for the streetscape planter. We have had trouble keeping it alive even in larger, shaded planting areas behind sidewalk. Please find alternative, or eliminate groundcover layer and add accent material.

Fire Department

Staff Contact: *Shelley Jin, (425)-452-5251, sjin@bellevuewa.gov*

Refer to attached Fire Department marked up documents for comprehensive set of review comments. Fire Department comments were initially provided on May 11, 2023 and requested again on January 10, 2024.

1. Repeat comment: Drawings still have unflattened viewports, which appear as large blue boxes whenever I try to take measurements. Remove these in next submittal.
2. Applicant has verbally assured FD reviewer that the buildings are below the threshold height for fire service access elevators. Elevations clearly show highest occupied floor is

more than 120 feet above the lowest level of Fire Department access. Per BBC Section 403.6.1, fire service access elevators are required.

Transportation Department

Staff Contact: Randa Kiriakos, (425)-452-2569, rkiriakos@bellevuewa.gov

Refer to Transportation comments and mark-ups, attached.

Please provide a written response to all the comments below.

1. TIA needs to be updated with new Concurrency (due to increase in the number of residential units/commercial space):
 - a. Concurrency application and determination have been updated and provided to TSI.
 - b. Update Trip generation Memo.
 - c. Update TIA references to number of units and commercial space in the write-up and tables.
 - d. Update references to the updated trip generation memo date.

Level-Two Traffic Report	Pinnacle Bellevue North	20-102949-DC
<u>METHODS AND ASSUMPTIONS</u>	Update #s and dates based on the new concurrency.	
<u>Transportation Concurrency</u>		
A transportation concurrency reservation for the Project was granted by the City of Bellevue on October 26, 2023 and is provided in Appendix F. The concurrency reservation covered a net total of 595 Mobility Units in Bellevue Performance Management Area (PMA) 1. The transportation concurrency Mobility Unit reservation calculation was based on the Project trip generation forecast, which is described in the September 27, 2023 memorandum "Pinnacle Bellevue North Trip Generation; September 2023 Update," included in Appendix E.		

Level-Two Traffic Report	Pinnacle Bellevue North	20-102949-DC
<u>PROJECT TRIP FORECASTING</u>	Update reference	
<u>Project Trip Generation</u>		
Project trips were forecast using the ITE <i>Trip Generation Manual 11th Edition</i> (TGM), ITE <i>Trip Generation Handbook 3rd Edition</i> (TGH), City of Bellevue "Multimodal Concurrency Implementation Guide (September 2022), and US Census American Community Survey data. A detailed description of the trip generation forecasting methodology and results is included in the September 26, 2023 memorandum "Pinnacle Bellevue North Trip Generation; September 2023 Update," which was approved by City of Bellevue staff on October 30, 2023 and is included in Appendix E.		

- e. Pg. 16: Provide traffic volume figures for 2028 with Project traffic.

The traffic volume forecasts provided by the BKR travel demand model focused on the PM peak period. 2028 AM peak hour traffic volume forecasts were assumed to increase at a rate equal to the PM peak hour growth forecast. 2028 Without Project traffic volume forecasts are summarized in Figures 10 and 11.	
Provide traffic volume figures for 2028 with Project traffic.	

f. Pg. 42: Update driveway widths per proposed design.

Level-Two Traffic Report

SITE ACCESS

Pinnacle Bellevue North includes:

- Access to a parking garage off 101st Ave NE north of NE 10th Street. The driveway width proposed is 26 feet and includes one lane inbound and one lane outbound. The driveway provides access to both the shopping plaza with supermarket and residential uses. The height clearance of this driveway does not permit commercial vehicles and will be signed accordingly.
- Access to a parking garage off 102nd Ave NE. The driveway width proposed is 30 feet and includes one-lane inbound and two-lanes outbound (left-only and right-only). The driveway provides access to both the shopping plaza with supermarket and residential uses. Commercial vehicle (up to WB-67) loading

36-ft driveway approach (with an 8-ft apron to accommodate the turning movements of oversized vehicles)

This has been modified to 30-ft

Some of the TIA comment responses and statements are inconsistent with the proposed plans and requirements for the MDP with the Roundabout intersection at NE 10th Street/102nd Avenue NE, below are some examples – we disagree with these statements in the TIA. We will not require a revision however we will address in the staff report.

2. Previous comment under “Pedestrian Crash Analysis” (Pg. 41):

- City Comment: Pinnacle North and South developments will increase pedestrian volumes as you noted. Discuss what Pinnacle North proposes to mitigate the impacts of the development: i.e. Discuss how the roundabout enhances the pedestrian safety and reduces the driving speed through the roundabout intersection.
- TIA revision: (there’s no reference to benefits of a roundabout

Lower vehicle speeds have been demonstrated to reduce pedestrian and bicycle crash frequency and severity. In addition to the Project nonmotorized improvements, the City of Bellevue should consider reducing the posted speed limits from 30 mph to 25 mph on NE 10th Street, 100th Avenue NE, and 102nd Avenue NE in the project vicinity. A 25-mph speed limit is justified given the potential for high levels of active transportation activity on these routes, based on the National Association of City Transportation Officials (NACTO) report *City Limits: Setting Safe Speed Limits on Urban Streets* (2020).

3. Previous comment under “Pedestrian Circulation and Transit” (Pg. 45):

- City Comment: In this section or in the mitigation section: Add a discussion of the Roundabout and pedestrian crossings improvements at the roundabout with splitter islands and RRFB system at each crossing.
- Comment Response from TSI: This discussion is not included. The analysis found no nexus for roundabout improvement requirement.

4. Previous comment under “NE 10th Street at 102nd Ave NE Intersection Control Evaluation” (Pg. 48):

- TIA wording:

NE 10th Street at 102nd Ave NE Intersection Control Evaluation

The operations analysis described above did not indicate any safety or operational deficiencies at the intersection of NE 10th Street and 102nd Avenue NE. However, this section is provided as a response to a request from City of Bellevue staff.

- City Comment: How come? This is not an accurate statement. The intersection of NE 10th St/102nd Ave is within the high injury network discussed in the Crash

History section. High volumes of pedestrians will be generated from both Pinnacle North and South and will access the intersection. What about pedestrian safety benefits with the roundabout?

- Comment Response from TSI: The 10th St/102nd Ave intersection reported 3 pedestrian crashes in 10 years. This is not a high pedestrian crash location. Further, the recently constructed RRFB on NE 10th St and the proposed RRFB on 102nd Ave will mitigate project-generated pedestrian impacts on the public street network. The City has no policy to indicate that signalized intersections are unsafe for pedestrian travel. For these reasons, this analysis does not recommend the project provide a roundabout at 10th St & 102nd Ave NE.

5. Questionable Statements:

a. Crash History (Pg. 11):

At NE 10th Street and 102nd Ave NE, one fatal “approach turn” vehicle-on-vehicle crash was reported in 2013. Bellevue staff noted that traffic signal improvements were made at this location in 2014, including adaptive signal control and the modification of signalized left-turn phasing from permissive to protected/permissive with flashing yellow arrows. Federal Highway Administration data indicates that the conversion of permissive left-turn phasing to protected/permissive left-turn phasing results can be expected to result in a 40 percent reduction in turning collisions at signalized intersections¹. Due to the implementation of this safety improvement after the 2013 fatality, the intersection should not be considered a high crash location.

The pedestrian phase does not run with the Flashing Yellow Arrow.

¹ FHWA Crash Modification Factor Clearinghouse CMF ID 7684 “Change from Permissive Only to Flashing Yellow Arrow Protected/Permissive Left Turn”

b. Measures to Mitigate for Safety Impacts (Pg. 52):

Measures to Mitigate for Safety Impacts

The safety analysis indicated that three intersections had potential for improvement when compared to similar intersections in similar locations.

- NE 10th Street and 102nd Ave NE. The intersection has a low, +0.4 potential for improvement. There was one pedestrian-involved crash reported that resulted in a disabling injury, and one vehicle-on-vehicle fatal crash involving an approach turn at this intersection, both in year 2013. Improvements were made to this intersection in 2014 that reduced the potential for both crash types. This intersection would not likely have been identified for potential improvements if a typical 5-year crash history were analyzed. However, if additional safety mitigation is desired, reducing the NE 10th St and 102nd Ave NE posted speed limits from 30 mph to 25 mph in the project vicinity would further reduce the likelihood of serious injury and fatal crashes and is supported by NACTO guidance.

c. Future Traffic Operations (Pg. 54):

Future Traffic Operations

All study intersections are forecast to operate at LOS E or better through 2030 without mitigation.

The traffic signal-controlled intersection of NE 10th Street and 102nd Ave NE was found to be adequate to serve vehicle traffic and non-motorized demand generated by both the Pinnacle Bellevue North and Pinnacle Bellevue South Projects consistent with the city’s LOS and concurrency requirements. City staff requested that roundabout control be evaluated for this location. Roundabout control was found to be possible but is not necessary to mitigate project-specific impacts. The traffic signal at NE 10th/102nd includes accessible pedestrian signals and will be augmented by mid-block pedestrian crossings with median refuges and RRFB’s on NE 10th St and 102nd Ave NE.

Next Steps:

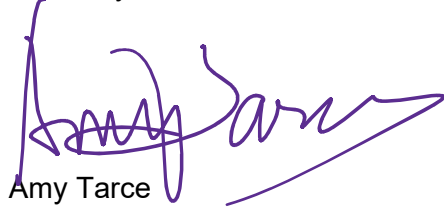
Please submit a consolidated revision submittal regarding the above information requested within 60 days **(November 18, 2024)** and upload to both the LD and LP permits through www.mybuildingpermit.com. Please submit the complete set of plans (not just the sheets which changed) and any supporting documentation requested. You will also need to submit a copy of this letter along with your revision, and a narrative describing how each item was addressed, and indicate where in the plan set the change occurred. A word version of this letter can be provided upon request for ease in responding to each item.

Please ensure that when you resubmit to the city that you upload everything on the same day, for both the MDP and LD permits. Items cannot be uploaded over multiple days.

If you need additional time to complete this revision request, please send an email to my attention requesting an extension and let me know how much additional time is needed and the reason for the extension.

Please do not hesitate to contact me, or any of the department reviewers if you have any questions.

Sincerely,



Amy Tarce
Senior Planner

Attachments: Marked Up Comment Response Letter
 Approved FAR and Dimensional Requirements tables
 Marked Up Architecture Plan Pre 8
 Marked Up Dimensional Table Pre 8
 Marked Up Administrative Departures Pre 6
 Fire Department Review Comments

Cc: Review Team