



May 11, 2023

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

**Re: Draft Curb Management Plan**

Dear Chair Stash and Commission Members:

We are writing on behalf of the Bellevue Downtown Association (BDA) to share input on the draft Curb Management Plan (CMP). The content of this letter reflects the BDA Transportation Committee’s work endorsed by the [BDA Board of Directors](#). The BDA supports the City’s initiative to adopt a CMP that successfully optimizes the movement of people and goods in a manner that supports economic activity, vibrant public spaces, safe walkable streets, and multimodal access.

Based on our review of the draft CMP alongside our collected work, we are sharing key points categorized under “alignment” with the desired outcomes and “issues” in need of further attention.

**ALIGNMENT**

1. The [draft Curb Management Plan](#) is a well-organized document that comprehensively packages the City’s previous work into a single plan. The scope and strategies presented in the draft are consistent with the BDA desired outcomes for a successful CMP.
2. [Appendix A – Curbside Practices Guide](#) lays out proposed improvements that identify costs, needed stakeholders for input, and actionable steps. The proposals in the guide are consistent with the BDA’s desired outcome and endorsed management tools.
  - **Engages with stakeholders.** The practices related to pricing components require an engagement process with nearby stakeholders to inform implementation and strategies for mitigating impacts. Changes to curb uses and/or dedicating zones include a stakeholder engagement process too. Every section of the curbside practices notes the “priority stakeholders” and methods to collect input.
  - **Adapts to changing conditions.** Each section of the Curbside Practices Guide includes strategies for collecting data to inform dynamic decision-making with a list of tools and technology that supports actionable steps to adapting the curb space.

- **Offers tools and approaches to manage spaces, including enforcement.** The Endorsed Management Tools in the BDA's CMP Advocacy Package are represented in the Curbside Practices Guide except for enabling public-private partnership to address private ROW management issues and publishing a ROW map. **Note:** the missing endorsement tools are addressed in the issues section of this memo.
3. [Appendix B – Curb Pilot Roadmap](#) provides a framework for gathering insights from six different pilot concepts to establish a strong understanding of project impacts, implementation costs, staffing required, and cadence of data audits. Building trust and confidence with the community has been a consistent BDA message throughout the process. The pilot projects allow for the improvements to be rolled out in a manner that is considerate of stakeholders concerned about impacts to their businesses and the multimodal system.

## ISSUES

1. The [draft Curb Management Plan](#) **does not account for privately-owned public spaces** and how uses interact with those curb spaces. As an example, TNCs and delivery trucks often use City Center Plaza's drive that loops through its plaza space. These types of interactions impact the City's modeling of curb supply and demand known in the draft CMP as "curbonomics." Additionally, the CMP's management strategies cannot be applied to privately-owned public spaces that would benefit from management practices consistent with the public spaces. *Note:* Based on input from the City, the CMP's scope is limited to public curb spaces where the City has authority. Designating privately owned spaces can create issues.
- **Recommendation:** Encourage the City to support partnership efforts that take inventory of privately-owned curb spaces in a manner that can integrate into the [City's Curb Typology](#) as a supplemental layer of information. A successful tool would be dynamic by design so it can easily reflect changes in an unbiased way with relevant and accurate information.
2. The [draft Curb Management Plan](#) and [Appendix A – Curbside Practices Guide](#) **do not have specific language about how a traffic study would be conducted** to inform changes to the curb or examine whether the outcomes are aligned with expectations.

Although the draft CMP does not specifically callout traffic studies as a tool, its structure does include an adaptive model that allows the City to respond to changes. This is illustrated by subsections titled Strategies and Implementation Actions in the Curbside Practices guide, a dedicated section to data collection in the section entitled Digital Governance in the Curbside Practices Guide, and an implementation strategy to gather input to guide future projects shown in Curb Pilot Roadmap. However, every tool should be available for identifying potential impacts to the multimodal system, specifically tradeoffs that result in a capacity reduction to general purpose lanes. Including language about a traffic study and acknowledging the need to preserve capacity for general purpose lanes are important elements to have represented in the draft CMP.

- **Recommendation:** Add language regarding use of traffic studies to section [DG.2 of the Curbside Practices Guide](#). Traffic studies should be available to 1) examine plans for a curbside project for potential issues to the surrounding multimodal network to mitigate impacts and 2) evaluate a newly implemented curb project to ensure the outcome aligns with what was expected. The language should also include details on the threshold for when a traffic study is triggered. Below are some triggers to consider:
  - Impacts to bicycle, pedestrian, and vehicle movement and capacity. Ensure curbside projects adhere to the performance metrics and targets laid out by the [Multimodal Implementation Plan](#).
  - Impacts to operations such as City services and business that rely on curb space activity.
- 3. The [draft Curb Management Plan](#) does not highlight the boundaries of public right-of-way (ROW) to help stakeholders understand the parameters of what spaces can be activated along the curb with or without a permit. This information is also helpful for developers seeking to understand the design limitations and opportunities of real estate projects.
  - **Recommendation:** The City should publish the ROW information as part of the final draft CMP or as a separate future initiative.

Downtown Bellevue would benefit greatly from a CMP that successfully addresses our curb issues in an adaptive manner that responds to emerging uses. We applaud the City for initiating this work and getting to this milestone.

Thank you for supporting Downtown and your leadership in advancing mobility improvements.

Sincerely,



Patrick Bannon  
BDA President & CEO



Matt Jack  
BDA Director of Public Policy