

CITY COUNCIL STUDY SESSION ITEM

SUBJECT

Introduction of Final Environmental Impact Statement for East Link Light Rail project.

STAFF CONTACT

Mary Kate Berens, Deputy City Attorney

POLICY ISSUES

Discussion of the analysis and responses to previous City comments on the East Link light rail project.

DIRECTION NEEDED FROM COUNCIL

<u> </u>	Action
<u> X </u>	Discussion
<u> X </u>	Information

This is the first of several planned study sessions to allow the Council to review the information regarding the East Link light rail project and alignments included in the project's Final Environmental Impact Statement (FEIS).

BACKGROUND/ANALYSIS

Because the FEIS was made publicly available on July 7th, staff has not yet had sufficient time to analyze and summarize the responses to the comments the City previously submitted on the Draft and Supplemental Draft EIS. Monday's discussion will focus on the major issues and categories of concern raised in past City comments, as well as a request for direction on where to focus future study session discussions. Attached to this memorandum are copies of the past formal comment letters submitted to Sound Transit on the DEIS and SDEIS for Council's reference. Copies of the FEIS are provided under separate cover.

ALTERNATIVES

Council is not asked to provide specific direction. Staff will return for further study session discussions on those impacts and mitigation of particular interest to the Council.

RECOMMENDATION

N/A

ATTACHMENT(S)

A Past comment letters on DEIS and SDEIS

City of
Bellevue



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February 25, 2008

The Honorable Greg Nickels, Chair
Sound Transit Board of Directors
401 South Jackson Street
Seattle, WA 98104

Re: Bellevue City Council East Link Alignment Preferences

Dear ~~Chair~~ ^{Greg} Nickels,

On behalf of the Bellevue City Council, I am writing to transmit the City's preferred East Link alignment alternatives to the Sound Transit Board. The Sound Transit 2 package, including the East Link Project, was overwhelmingly endorsed by Bellevue voters last fall, and it represents an immense long-term transportation investment for our community. This project will help the City and region realize significant land use goals and provide economic and community development benefits for generations to come. We strongly believe the City and Sound Transit must work diligently to ensure the project enhances local and regional transportation systems and is designed in a way that protects neighborhoods and businesses and advances the local and regional land use vision.

The City's preferred routing decisions are the result of careful study and significant public discussion. Bellevue has invested over three years in review, planning, outreach and deliberation to reach this recommendation. Preparations for light rail include the Bel-Red Corridor planning effort, the Light Rail Best Practices Project, Downtown planning efforts, and public engagement. The Bel-Red Corridor Plan, adopted earlier this month, was undertaken in part because of the transformative opportunity presented by light rail. This area has potential to be one of the largest transit-oriented-developments in the region. The Council initiated the Light Rail Best Practices Project to develop principles and policies that reflect community values in order to prepare for important decisions related to the integration of light rail in Bellevue. In the course of reviewing other systems, including extensive site visits and meetings with transit system providers and local agencies, we found no other example of a city taking such a proactive approach to preparing for the arrival of light rail. Additionally, the Council held two public hearings on light rail to listen to our citizens and stakeholders on this vital topic. This work prepared the Council to grapple with the complexity of issues reflected in the alignment selection process.

The Bellevue City Council's Preferred Alternatives (Map Attached)

Segment B: B3, the Bellevue Way/112th Avenue SE Bypass, modified to be east-side running

- B3 modified to be east-side running on Bellevue Way and 112th Avenue SE balances three key principles in South Bellevue: provides transit access by facilitating regional and local connections at the South Bellevue Park-and-Ride, protects neighborhoods by placing the line farther away from residences, and minimizes construction impacts by

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reducing the amount of street reconstruction required along these major transportation corridors.

Segment C: C2T, the 106th Avenue NE Tunnel Alternative via the Red Lion site

C2T maximizes value for both the regional transportation system and the land use opportunities presented by light rail. For the regional transportation system, the tunnel accommodates the multi-modal transportation system necessary for a metropolitan center and provides capacity for future expansion of the light rail system not possible with an at-grade or elevated alignment. For land use, C2T allows downtown Bellevue to continue to accommodate regional growth and helps realize local land use potential east of I-405 in Wilburton.

Segment D: D2A, the NE 16th Street At-Grade Alternative

D2A advances local and regional goals by facilitating redevelopment of the Bel-Red Subarea in a pattern that focuses a majority of employment and residential growth in mixed-use, pedestrian-oriented and transit-supportive nodes, centered around light rail stations at 124th and 130th Avenues NE. These are among the most transformative transit-oriented-development opportunities on the East Link project and will significantly support ridership, while also connecting to Overlake in an efficient manner consistent with Redmond's adopted plans.

The City's preferred alternatives are essential to achieving local and regional land use plans and to the ability of Bellevue to accommodate future growth as one of five metropolitan centers for the region. In addition to meeting Bellevue's light rail policy principles, our preferred alignments ensure that the metropolitan centers of Seattle and Bellevue, along with Redmond's urban centers, will be connected via a light rail system. Our recommendation maximizes the ability of the system to meet long-term regional transportation needs and to grow the system over time while balancing the needs of the City. These local needs include protecting parks and neighborhoods and ensuring the system is compatible with and supports our long-term vision for Downtown Bellevue and the recently adopted Bel-Red Subarea Plan.

We recognize the challenges Sound Transit faces in balancing these choices with funding resources. However, East Link is a 100-year investment for the region and it will be a defining feature for Bellevue. The Sound Transit Board has a record of thoughtfully balancing the long-term needs of the system with funding and local values. We are committed to being an active partner with Sound Transit to identify potential cost saving measures and additional funding resources to ensure the City's preferred alternatives can be implemented and the system is built to support the regional vision.

The selection of the East Link alignment is a critical step in advancing the project. We appreciate the opportunity to share the results of our extensive process to identify Bellevue's preferences, and would welcome the opportunity to provide Board members with a tour of the segment areas so that you may see first hand the unique qualities of each part of Bellevue where light rail will travel.

A more detailed discussion regarding the City's process and the recommendations by segment is provided below.

Background Context

Light rail is a critical component of the city's vision for its future and the future of the region. Bellevue is the second largest city in King County, growing in recent years to become a center of commerce and culture on the Eastside. Our Downtown has become dense with high rise offices and, increasingly, with residential towers. Downtown Bellevue must have the highest level of service and performance from light rail while having a minimal effect on mobility for transit and cars. The additional travel capacity provided by light rail ensures the continued vibrancy of downtown as it grows. In the Bel-Red Subarea, the planned transit-oriented development coupled with light rail will transform the area into a vibrant, sustainable community. For Bellevue as a whole, East Link provides much needed transit service improvements in reliability, travel time, frequency, and convenience, making transit an attractive travel alternative to driving alone.

At the same time, we are mindful about the potential impacts of light rail and the many details of project development that are presently unknown. The City Council and members of the community are concerned about both the temporary and permanent impacts of property displacements, construction, and visual and operational impacts. We recognize that there are numerous critical decisions ahead in project design that will further define the scope of impacts and mitigation opportunities. We look forward to collaborating with Sound Transit and the Bellevue community to evaluate trade-offs and develop innovative, thoughtful approaches to system design and mitigation.

In anticipation of the East Link project, the City Council initiated the Light Rail Best Practices Project in 2007 to prepare for important decisions related to the integration of light rail in Bellevue. The project included research and case study tours to learn from the experiences of other cities and the development of light rail related policies, guiding principles, and an action plan for light rail integration. The City's light rail policy principles are:

- Connect "somewhere to somewhere" by conveniently serving the places where people live, work, and play
- Accommodate long-term, multi-modal transportation system development
- Optimize ridership
- Consider construction impacts and risks
- Protect environmentally sensitive areas
- Advance the long-term land use vision by serving existing and planned concentrations of employment and population by:
 - Serving transit oriented development (TOD), in the Downtown and Bel-Red subareas
 - Protecting the character and livability of existing neighborhoods
 - Selecting alignment profiles that are consistent with the urban design context of their locations

The policies and principles have aided the Council's consideration of alignment options, allowing Council to focus on key priorities and values of the community in selecting our preferred alignment. Additionally, the Light Rail Best Practices Project has prepared the City to be an engaged, informed partner with Sound Transit in realizing the optimal potential for East Link in Bellevue.

The Recommendation Process

The City Council followed a deliberative process to identify our preferred East Link alternatives, focusing on three components: a technical review of the information provided in the East Link Draft Environmental Impact Statement (DEIS), a review of relevant City policy, and consideration of extensive public input. In December and January, Sound Transit and City staff provided a series of briefings on the findings of the East Link DEIS. We appreciate the time and responsiveness of Sound Transit staff in providing detailed information on alignments, and the City's comments based on a technical review of the DEIS are attached. Major themes of the technical review include:

- Ensuring growth forecasts are reported accurately in the FEIS and reflected in the technical analysis;
- Concern that the DEIS underestimates traffic issues and transit ridership, and requesting more thorough analysis of the impacts of light rail on the transportation network, including street operations, signal timing, and distribution of volumes; and
- Requesting more thorough analysis of mitigation measures and providing more detail on construction impacts and mitigation.

The essential nature of light rail to the City's vision is reflected in an adopted body of light rail policy contained in the Comprehensive Plan and Council interest statements. This body of policy articulates the community values related to the development of light rail in Bellevue. The City Council carefully considered the ability of each alignment to advance City policy direction and be consistent with community values regarding light rail development in Bellevue. Finally, the City Council received hundreds of emails and listened to hundreds of comments during a public hearing on Bellevue's preferences on February 2. Upon thorough consideration of impacts associated with each alignment, compatibility with City policies, and public input, the City Council has identified the alternatives described below as our preferred route for East Link in Bellevue.

The Locally Preferred Alternatives

Segment B – B3 Modified

The alignment in this segment posed the most difficult choice for the Council because of the potential impacts in all of the options. After carefully considering each of the alignments as presented in the DEIS, the Council concluded that B3 modified to address some significant adverse impacts is the preferred alignment. Council is recommending a B3 Modified alignment with an emphasis on the following features:

- Elevated exiting I-90 to preserve the westbound HOV on-ramp, touching down to an at-grade profile to the east of Bellevue Way just south of the south Bellevue Park-and-Ride.
- At-grade station on the existing South Bellevue Park-and-Ride property with the proposed 1400 stall garage.
- At-grade, or depressed at feasible, in its own new right-of-way on the east side of the existing street, along the entire length of Bellevue Way and 112th Avenue SE, and
- Turning eastbound on the south side of SE 8th Street, transitioning to an elevated structure, and crossing over SE 8th Street to turn north along 114th Avenue SE to the Red Lion site.

After extensive deliberation, the Council developed this modified alignment to serve the South Bellevue Park-and-Ride, avoid many of the undesirable impacts of other Bellevue Way alignments, protect neighborhoods, and potentially reduce costs and ease construction of East

Link in South Bellevue. B3 Modified is the most consistent with local policy objectives and has potential to best meet the needs of both Bellevue and Sound Transit. Bellevue staff will work closely with Sound Transit in the coming months to more fully evaluate the alternative and to ensure the design of the route accomplishes our mutual goals.

The Council believes, based on a preliminary analysis by City staff, that this modified alternative at least partially mitigates operational and environmental impacts of the DEIS B3 alternative. First, running the alignment on the east side of Bellevue Way and 112th Avenue SE may avoid the residential displacements of the other alignments and moves light rail farther away from all residential uses, thereby reducing noise and visual impacts. In San Jose, the Light Rail Best Practices Committee visited segments that were median-running and pushed the right-of-way closer to existing residences. This resulted in greater traffic noise and reduced setbacks for these residences, a situation that can and should be avoided in Bellevue. The ability to minimize these types of impacts by moving the tracks farther away from residential uses does not exist with the B1 and B7 alternatives. Second, one of the reasons for median-running is to avoid driveway conflicts along a street. However, in this instance there are only six driveways that would be affected, three of which are associated with the park-and-ride facility, and only one driveway along 112th Avenue SE. All of these driveways can either be modified or eliminated to address safety and access issues. One of the driveways is at the F.W. Winters House. The Winters House may need to be relocated in order to accommodate this alternative. Based on a preliminary assessment, the Council believes this is feasible and the relocation costs could be offset by the cost savings of this modification. Third, traffic impacts at the Bellevue Way and 112th Avenue SE "Y" intersection would be avoided by a side-running configuration. Finally, by turning eastbound on the south side of SE 8th Street, then transitioning to an elevated structure that would cross over SE 8th Street and turn north to continue along 114th Avenue SE, the B3 Modified may avoid impacts to businesses north of SE 8th St.

There are potentially significant project cost savings and benefits from reduced construction disruption to be realized by avoiding a substantial rebuild of Bellevue Way and 112th Avenue SE and preserving existing right-of-way. The 112th Avenue SE and Bellevue Way corridors between Downtown and I-90 experience high traffic volumes, particularly during peak hours. These streets also serve critical transit routes, including the Sound Transit 550. Sustained partial closures of lanes along these roadways would cause severe traffic impacts both in the corridor itself and on already congested alternative routes. Maintaining traffic capacity on Bellevue Way is imperative, as is mitigating all construction impacts. Building light rail on the east side of the road would allow Sound Transit to minimize street disruption and may be more straightforward because of the avoidance of some of the complexities involved in working in an urban street environment.

Finally, the B3 Modified alternative maintains and optimizes the regional connections of the South Bellevue Park-and-Ride and the HOV direct access ramp connecting Bellevue Way to westbound I-90. Service to the South Bellevue Park-and-Ride builds on the existing local and regional transit service pattern, linking other parts of Bellevue and the region to the light rail system. The South Bellevue Park-and-Ride also offers convenient walking access for residents of the Enatai neighborhood and bicycle access from the I-90 bike path. These critical multi-modal connections make the B3 Modified alignment the best fit for Bellevue and the East Link system.

While the B3 Modified offers many opportunities to avoid and minimize impacts, some are unavoidable. As under all Bellevue Way alternatives, there will be extensive permanent traffic impacts due to the expansion of the South Bellevue Park-and-Ride. Bellevue staff have developed additional conceptual mitigation strategies, such as grade-separated access to the Park-and-Ride, to address this increased traffic and request that these be further analyzed in the FEIS. During construction, we are concerned about how the temporary closure of the South Bellevue Park-and-Ride and displacement of transit service will be mitigated. As part of the analysis of B3 Modified, we request a through exploration of both permanent and temporary impacts and mitigation opportunities.

Mitigation will be key to the success of East Link throughout Bellevue and nowhere is that more evident than in segment B. The City's Light Rail Best Practices Report recommended that the City "anticipate impacts and advocate for exceptional mitigation." "Exceptional" does not necessarily mean more expensive. Rather, it requires that the City and Sound Transit explore the potential range of mitigation measures to effectively address impacts and not simply rely on a minimum or standard approach. Council strongly recommends that the FEIS thoroughly analyze and compare the impacts and mitigation of the B3 Modified with the DEIS B3 alternative. The City is committed to working closely with Sound Transit to make this modified alternative work for both Bellevue and Sound Transit.

The Council also spent significant time discussing the B7 alternative. There are several advantages to this alignment, including the use of existing BNSF right-of-way to avoid disruption and rebuilding of Bellevue Way and 112th Avenue SE, creating additional transit linkages and expanded park-and-ride capacity along the I-405 corridor, and avoiding impacts to the Surrey Downs and Enatai residential neighborhoods. However, the Council concluded that there are significant adverse impacts associated with B7 as presented in the DEIS and that there are extremely limited opportunities for mitigation. First, the intersections along SE 8th Street at 118th Avenue SE and I-405 are presently very congested. The addition of significant volumes to these intersections from the 118th Station would cause extreme delay. Opportunities for mitigation are severely constrained due to the widening of I-405 to the west and the physical environment including wetlands, fish ladders, existing development, and the Mercer Slough Nature Park, all of which limit roadway expansion. Based on Bellevue staff's preliminary analysis of potential traffic impacts on 118th Avenue SE and the intersections near the 118th Station, Council believes the impacts would be extremely difficult, if not impossible, to mitigate. Second, for patrons heading to Seattle from the south or east, accessing the 118th Station would require out-of-direction travel along the heavily congested I-405 mainline. Third, because there is limited transit in the area currently, transit service patterns would be modified, causing repercussions for the remainder of the system, and also require out-of-direction travel and add travel time for thru-riders to access the station. Increased travel times and out-of-direction travel are notable deterrents to taking transit and have the potential to negatively impact ridership. Finally, there would be significant, adverse impacts to some of the residences along the BNSF right-of-way that could not be completely mitigated. Although the DEIS indicates noise walls and other mitigation could be used to attenuate noise on the inside of units, there is not mitigation proposed that would address the noise on the outside decks and balconies.

Despite these concerns, some Council members preferred B7, particularly if the traffic and community impacts could be mitigated. Therefore, as Sound Transit proceeds with the FEIS, analysis of B7 should be further advanced, including assessing traffic impacts for nearby

intersections and along the entire length of 118th Avenue SE, reviewing projected ridership, evaluating opportunities for regional transit connections, identifying construction and community impacts, and evaluating the potential for future light rail extensions. A thorough evaluation of mitigation opportunities and feasibility should be assessed for all identified impacts. This will facilitate a more informed reevaluation of the B3 and B7 alternatives by Council if the B3 Modified is not found to be feasible in its entirety.

Council unanimously rejected the B1 alternative for several important reasons. First, it has the highest number of residential displacements, including 13 in segment B and 93 in segment C. Second, the construction-related disruption to traffic along Bellevue Way from I-90 into Downtown Bellevue would be significant on one of the city's primary north-south routes. Third, this option requires substantially rebuilding all of Bellevue Way to accommodate median-running light rail up to segment C. Finally, B1 would significantly impact access in this area by restricting turning movements along Bellevue Way and eliminating both HOV direct access ramps to I-90. The Council did not feel these impacts were acceptable given other viable alternatives.

Although the B2A alignment is similar to B3, the Council rejected this alternative in favor of the B3 Modified for many reasons. First, B2A continues at-grade along 112th Avenue SE into Downtown and it locates a station at SE 8th Street and 112th Avenue SE. Council strongly favored locating a station closer to Downtown and the adjacent neighborhood does not favor a station at SE 8th Street. Second, the modified B3 alignment has an advantage over B2A in that it turns away from the residential neighborhoods on 112th Avenue SE as it approaches Downtown. This avoids the widening on 112th Avenue SE where right-of-way becomes more constrained north of SE 8th Street and avoids removal of mature vegetation in this corridor. Third, the median-running alignment of the B2A alternative would result in significant traffic disruption during construction and require rebuilding of a substantial amount of Bellevue Way and 112th Avenue SE. Finally, the median-running alignment would remove the vegetated median along 112th Avenue SE which contributes to the character of the surrounding residential areas. For these reasons, Council strongly believes B3 Modified is superior to B2A.

Council also unanimously rejected the B2E alternative. Although it follows some of the same routing as the B3 Modified, it has none of the other advantages as the Council's preferred alternative for this segment. The elevated structure would create a "wall" for the entire length of the segment, resulting in tremendous visual impacts for nearby residents and patrons of the Mercer Slough natural area. This alternative also has the highest costs for segment B without commensurate benefits. Although this alternative would place a station at 112th Avenue SE and SE 8th Street, the residential neighborhoods in this area have concerns about this station location and feel a station on Main Street, closer to Downtown, would provide the benefits of light rail access without the same impacts.

As stewards of the regional investment, the Council recognizes and appreciates the Sound Transit Board's focus on key considerations for the region as evaluated and summarized in the DEIS alignment comparison. We find B3 Modified is the best option from a regional, as well as local, evaluation process.

To conclude the discussion of segment B preferences, key comparisons consistent with the evaluation summary of the DEIS Executive Summary are addressed below:

Markets Served: B3 Modified serves the regional South Bellevue Park-and-Ride and connects to an East Main Station in Segment C, serving the southern part of Downtown and Surrey Downs, and the hotels and businesses to the south of the Red Lion site.

Ridership: Forecasts predict 4,000 daily boardings at the South Bellevue Park-and-Ride in 2030. This is significantly more than the 1,000 daily boardings predicted for the 118th Station on the B7 alignment. The 500 boardings predicted at the SE 8th Station, to be served by B2A or B2E, can be served at an East Main Station.

Transportation Impacts: Under B2A and B3, traffic at the intersection of Bellevue Way and 112th Avenue SE would experience delays due to light rail vehicles travelling at-grade through the intersection. B3 side-running may avoid this impact by placing light rail adjacent to the intersection, thereby avoiding traffic impacts and any associated impacts to light rail performance. There are opportunities to mitigate traffic from the expanded park-and-ride north and south on Bellevue Way. Impacts to the SE 8th Street and 118th Avenue SE intersection associated with B7 would be difficult, if not impossible, to adequately mitigate because of environmental and right-of-way constraints in the area.

Environmental Impacts During Operation: B2A and B3 would displace three residences, no businesses, impact 20 noise receptors which could be mitigated for indoor noise, and reduce visual quality by removing vegetation on the west side of Bellevue Way and the 112th Avenue SE median. B3 side-running, not including possible mitigation measures, may avoid displacing the three residences and may not require expansion of the roadway to the west thereby reducing noise impacts, and preventing removal of the vegetation described above. B3 side-running may require a larger acquisition of Mercer Slough and wetlands than the 1.2 acres in B3, but additional mitigation opportunities exist within Mercer Slough. B7 would displace four businesses with 130 employees, noise would affect up to 98 receptors which could be mitigated for indoor noise (but not outdoor), and would permanently impact up to 1.8 acres of wetland and 3.1 acres of high-value non-wetland habitat.

Temporary Impacts During Construction: In all Bellevue Way options, modification to Bellevue Way and 112th Avenue SE and partial or full closure of the South Bellevue Park-and-Ride would temporarily result in traffic detours, lane closures and signal modifications. Maintaining traffic capacity on Bellevue Way is imperative. B3 Modified has the potential to minimize construction in the street right-of-way, thereby minimizing these negative impacts. A temporary construction easement along the west side of Mercer Slough would be required under all Bellevue Way options and B3 Modified. B7 would also require temporary construction easements in the Slough and partial long-term lane closures on 118th Avenue SE.

Construction Risk: Construction risk is low for all B alignment options. B3 Modified has potential for even lower construction risk because of the reduced exposure to risk associated with rebuilding streets.

Segment C – C2T

The Council weighed the relative benefits and impacts of the three potential profiles for Downtown Bellevue: elevated, at-grade and tunnel. Based on the light rail policy principles, as well as the research of other systems in the Light Rail Best Practices Report, the City Council concluded that a tunnel through Downtown Bellevue best meets the needs of the city and the region. Of the three tunnel options, the City Council unanimously recommends alternative C2T because it provides the best service to key parts of segment C and it maximizes value to the region's taxpayers by realizing short- and long-range needs and benefits of the system.

In early 2008, Bellevue's Light Rail Best Practices Committee visited three other systems (Portland, San Jose, and San Diego) and met with transit agency staff. All of these systems face significant challenges with the at-grade portion in their respective downtowns. In Portland and San Diego, the main issue is the limitation of the street capacity to accommodate system expansion. San Jose is experiencing lower ridership and capacity restrictions due to the slower operating speeds through downtown – it is a “choke point” in the middle of the system. Transit staff for all of these systems indicated that a tunnel would have resolved these issues. A key similarity of Bellevue to San Jose noted by the Light Rail Best Practices Committee is that light rail riders would be traveling both to and through Downtown. The Committee believed, and the Council concurs, that Downtown Bellevue could become a “choke-point” for the entire East Link system with an at-grade alignment. The lesson learned from these systems, expressed by agency staff in San Jose, is to “build it right the first time.” As in Seattle, a tunnel provides capacity necessary to serve the growth commensurate with Bellevue's role as a metropolitan center and to allow future system expansion to Totem Lake or along the 520 corridor that an at-grade or elevated system could not provide.

Another compelling reason for the C2T recommendation is that it provides a station in the area immediately east of Downtown and I-405, the Wilburton Subarea, that is slated for redevelopment to a more intensive mix of uses. This station location also better serves the entire hospital district than a station over or just east of I-405 on NE 12th Street. Although the C1T option would follow the same alignment east of I-405 as C2T, the C1T option was rejected by the City Council after weighing system benefits with construction costs, residential and business displacements and other environmental considerations.

One aspect of the C1T option that the City Council preferred is the additional downtown station near Old Bellevue. The remarkable growth of Downtown Bellevue in recent years places the area on track with the forecast of 14,000 residents and 63,000 jobs by 2020 anticipated in the *Downtown Implementation Plan*. Robust additional growth in housing and jobs is expected to continue well beyond 2020, with 19,000 residents and 79,000 jobs forecast for the year 2030. The Council feels very strongly that East Link should be designed and built today to serve that future growth. For these reasons, the City Council strongly encourages Sound Transit to analyze a station location at Main Street and 106th Avenue NE in the south-central area of Downtown in the FEIS. If it was a promising location, it could be built in lieu of a station at the Red Lion site at Main Street and 112th Avenue SE. The Council's preferred construction staging area for the east end of the tunnel remains at the Red Lion site, with minimal impacts on the south side of Main Street west of 112th Avenue NE to avoid residential impacts as adopted in Comprehensive Plan policy TR-75.35.

The City Council unanimously rejected the at-grade alignment for segment C. Additionally, we did not hear any support from the community for an at-grade alignment Downtown. Downtown Bellevue's “super block” configuration has about 50% fewer streets than a typical downtown of this size. As a result, high volumes of traffic are focused on a few streets with little or no opportunity to disperse traffic traveling into and through the area. This is compounded by the fact that most Downtown Bellevue right-of-ways are relatively narrow (60 feet typical right-of-way width), and buildings are set to the edge of the sidewalk rather than set back by a landscaping strip. These factors constrain or even prohibit the ability to add capacity for light rail or vehicular travel in the future. Light rail is a critical component of the growth strategy, and

because right-of-way is so limited, light rail must be implemented as a complementary investment, and not at the expense of limited street capacity.

We appreciate that Sound Transit performed supplemental traffic modeling of the surface alternative, but the City's technical review of this modeling found serious flaws and gaps. Several of these are critical or fatal flaws for this alternative, summarized below:

- 1) The analysis does not consider the potential for light rail system disruption from traffic congestion. As traffic volumes increase (as they are projected to do with or without light rail), there will be more frequent intersection delays along NE 4th and NE 8th Streets, the major east-west routes. This would cause back-ups onto the I-405 mainline and block the light rail route, resulting in delays and potential service disruptions on the entire system.
- 2) The analysis makes assumptions about signal phasing that are inconsistent with accommodating expected future demand and result in more favorable light rail and street operations performance than is reasonably expected.
- 3) The model did not accommodate a significant share (approx. 15%) of traffic trying to access Downtown Bellevue in the Build and No Build scenarios. Assuming that the other vehicles are not served (for example, they are backed up on the I-405 mainline) in order to accommodate light rail trains is not realistic, given the impacts to the entire transportation network, i.e. to local streets, buses, trains, and highways.
- 4) The model does not reflect adopted plans and land use forecasts for adjacent areas (e.g. the Bel-Red Corridor) and therefore underestimates the impacts on downtown street performance and light rail operations.
- 5) The model simplified property access by assuming the closure of driveway access across light rail tracks. Given existing garages and building configurations, this likely is not feasible and underestimates street system impacts and property access issues. It also does not assess the impact on light rail performance where driveways cannot be closed.
- 6) The analysis assumes a single train with nine minute headways and a seven minute travel time through the segment. Council views this system as a 100-year investment that should take into account future expansion to serve other areas of the Eastside. System expansion would increase the number and frequency of trains that would either use the same tracks or occupy additional streets; in either instance, exacerbating the situation described above.

Although the C3T option also offers high performance and short travel times, the Council felt that the impacts outweighed the benefits of this alternative. C3T has one of the highest displacements of businesses and employees, a large number of which would be medical clinics and offices associated with Overlake Hospital and the City's hospital district. The owners and tenants of these buildings have voiced strong concerns that finding suitable relocation space near the hospital would be extremely difficult if not impossible. The station proposed at this location on NE 12th Street would be less convenient for the Hospital District and would not advance the redevelopment potential within the Wilburton Subarea. In addition, the displacement of McCormick Park, both short- and long-term, would permanently and adversely alter the character and visual quality of this Section 4(f) protected resource, which defines the north edge of Downtown and the southern edge of the adjacent neighborhoods. These impacts could be reasonably avoided by the preferred C2T alignment.

The Council also unanimously rejected the two elevated options through Downtown. Elevated structures are in direct conflict with the well-established urban design policies and principles for the Downtown. Specifically, the elevated structures would:

- degrade the pedestrian environment, a key component of a successful light rail system;
- create access conflicts with several high-rise residential and office buildings;
- create severe visual, shade and shadow impacts on Downtown streets and sidewalks, including the view corridors that frame views of the Cascade Mountains; and
- have significantly higher business and employee displacements than the C2T alternative.

In addition, the C7E alternative provides very poor service to a major portion of the Downtown and the C8E could have significant traffic conflicts depending on column placement. Both of these alternatives have some of the lowest ridership and do not provide high value when weighing the impacts and benefits.

In selecting the C2T alternative, the Council recognizes that there could be disruptions from the cut-and-cover portions of the project. However, we understand that there is potential to bore approximately half of the C2T tunnel, and we strongly encourage Sound Transit to explore this possibility further in the FEIS. The Light Rail Best Practices Report contains lessons learned and techniques from other systems that describe how to minimize those impacts. Bellevue will work closely with Sound Transit in the design, planning and construction phases to identify and implement effective measures to minimize impacts. We also recognize that the C2T option initially has higher construction costs. However, we believe working together in the design process, we can reduce costs and make this segment both efficient and cost effective. We feel it has the best combination of performance and community value, making it the best investment for the next 100 years based on a regional, as well as local, evaluation process.

To conclude the discussion of Segment C preferences, key comparisons consistent with the evaluation summary of the DEIS Executive Summary are addressed below:

Markets Served: In Downtown, C2T serves the city center, City Hall, Bellevue Transit Center, Meydenbauer Center, and the NE 6th Street pedestrian corridor conveniently with a station directly underneath the existing Bellevue Transit Center. East of I-405, the Hospital Station serves Overlake and Group Health Medical Centers more conveniently than a station at NE 12th Street and also serves the Wilburton area slated for more intense redevelopment in the near future. The East Main Station serves the southeast corner of downtown, nearby neighborhoods, and the hotels and businesses to the south of the Red Lion site. A station farther west on Main Street has potential to better serve more of the Downtown as well as nearby neighborhoods and businesses.

Ridership: Forecasts predict 7,500 daily boardings at these stations in 2030. We anticipate C2T will produce higher ridership in the long-term because of the capacity and travel time benefits provided by a tunnel for future system expansion and because the Wilburton area will develop in a manner that is more transit supportive. The delta of 500 boardings between C3T is statistically insignificant in the long-term perspective. The at-grade and elevated options forecast 1,000 – 2,000 fewer boardings than C2T.

Transportation Impacts: The tunnel portal on NE 6th Street would reduce the roadway to one lane in each direction between 110th Avenue NE and 112th Avenue NE. This is preferable to the permanent change in access for residents of the neighborhood north of McCormick Park under C3T, C4A, and C8E, where a street would be closed by the transition structure and a new street connection created by taking a single-family home under C3T. However, design will be critical

to ensure continued transit access from the HOV dedicated ramp connecting I-405 to the Bellevue Transit Center via NE 6th Street.

Environmental Impacts During Operation: C2T generally has fewer noise, vibration, and displacement impacts than other downtown options. It also provides a feasible and prudent avoidance alternative to the impacts to McCormick Park associated with C3T, C4A, and C8E. These alternatives impacting McCormick Park are of particular concern because of the necessity of purchasing single-family residences for staging and parkland replacement and because of the DEIS finding of a 4(f) parkland use that cannot be mitigated to a de minimus level.

Temporary Impacts During Construction: While we recognize that C2T will have surface construction impacts due to the cut-and-cover tunnel, we find attributes of C2T construction more favorable than the alternatives, including construction on lower volume corridors than comparable alternatives, the ability to minimize staging-related displacements and consolidate staging activities outside of residential areas, and the opportunity to collaborate to phase construction and coordinate utility relocation and other related components of construction.

Construction Risk: As just described, we are committed to working with Sound Transit to minimize impacts and construction risks of C2T.

Segment D – D2A

Bellevue's preferred alternative for Segment D is D2A, an at-grade alignment that is closely integrated and is consistent with the major land use and transportation planning decisions that have been considered and made for the Bel-Red Corridor over the past several years, while also advancing regional goals.

Recognizing both the redevelopment potential within the corridor (based in part on its strong location proximate to both Downtown Bellevue and Overlake) and the opportunity to plan land uses integrated with light rail, Bellevue has concluded a three and a half year planning process for Bel-Red with City Council adoption of a Comprehensive Plan amendment adopting a new Subarea Plan for the area on February 17, 2009.

The Bel-Red Corridor Project, which was initiated in fall 2005, was an ambitious planning effort that involved a 16-member City Council-appointed steering committee, five of the City's boards and commissions, and input from hundreds of residents and business owners. A programmatic Draft Environmental Impact Statement (EIS), published in January 2007, analyzed the various alternatives for land use and transportation that emerged from the steering committee's work. In July 2007 a Final EIS documented the preliminary preferred alternative. The Draft EIS included assumptions made about high capacity transit service at certain locations within the corridor, and the FEIS included assumptions about high capacity transit service near Overlake Hospital Medical Center (OHMC), near 124th Avenue NE, near 130th Avenue NE, and in Overlake at 152nd Avenue NE. Subsequently, the preliminary preferred alternative was crafted into the Bel-Red Subarea Plan, plus Land Use Code amendments and design standards to implement the Plan.

A fundamental objective that is embedded in the Bel-Red Subarea Plan is a new development pattern that focuses a majority of the employment and residential growth in two mixed-use, pedestrian-oriented and transit supportive nodes, centered on potential future light rail stations. Given that the geography of the Bel-Red Subarea is rather linear, the location of those stations, and the alignment connecting them, was necessarily placed near the center of the corridor (along a proposed extension of NE 15th/16th Street, which the City intends to build) to achieve the envisioned development within ¼ mile of a station.

Transit oriented development near the two Bel-Red Subarea stations at 124th Avenue NE and 130th Avenue NE, will be among the most significant TOD opportunities on the East Link corridor. Light rail transit will help support a projected 4.5 million square feet of additional commercial development and 5,000 housing units in the Bel-Red Subarea by 2030. A majority of this redevelopment will be clustered around the proposed stations, which will significantly support ridership in this segment. The development of both stations is integral to the future success of these two TOD notes.

Since light rail is such an important component to supporting the land use vision within Bel-Red, how the alignment and stations are planned within the corridor to support contemplated land use and redevelopment is of critical importance to the City. At the 124th Avenue NE node, we are aware that Wright Runstad, the owners of the proposed "Spring District" site, has proposed a modification of D2A that would have a station in a retained cut adjacent to their proposed development. While the City has not had extensive time to fully study this proposal, we would encourage Sound Transit to further analyze this during the preparation of the FEIS.

It is important to note that while D2A is the alignment that is most consistent with the Bel-Red Subarea Plan, D5 is by far the least consistent. This alignment would not provide any service within the Bel-Red corridor, and is therefore not at all consistent with the City's land use and transportation vision (and Comprehensive Plan) for the area. We also believe that this alignment option would not deliver the same overall ridership and system benefits that would be delivered with the other alignment options for Segment D, particularly D2A. We also question the feasibility of D5, given potential future plans to widen or improve State Route 520.

The other alignment options within Segment D (D2E and D3) both would serve stations proposed in the Bel-Red corridor at 124th Avenue NE and 130th Avenue NE, but neither are as desirable as D2A. D2E is an all-elevated alignment, and the City is concerned about the aesthetic impacts that alignment would have with proposed redevelopment (and the broader land use vision) for the 124th Avenue NE and 130th Avenue NE development nodes. The alignment would also be more expensive than D2A without seeming to offer any accompanying ridership benefits. Alignment D3 would run light rail along a portion of NE 20th Street, which is an important retail corridor with a significant number of commercial driveway entrances. It appears from the EIS analysis that this alignment could induce significant hardship for those businesses, again with no accompanying benefit.

Finally, we support the station location option at the Overlake Village area in Redmond as proposed in Option D2A. We have incorporated this station location assumption into the Bel-Red Subarea Plan for the east end of the Bel-Red area. The City also supports, along with the City of Redmond, the D2A alignment running along NE 24th Street that connects the two cities. On the west side of the Segment D alignment the Bel-Red planning process did not specifically address in great detail which alignment option from Segment C would connect to Bel-Red from the west. Bellevue's preferred alternative for Segment C, C2T, is completely compatible with the City Council's preferred Segment D alternative, D2A.

We also find that D2A is the best option after a regional, as well as local, evaluation process. To conclude the discussion of Segment D preferences, key comparisons consistent with the evaluation summary of the DEIS Executive Summary are addressed below:

Markets Served: D2A serves the Bel-Red Subarea, including two development nodes at 124th Avenue NE and 130th Avenue NE, as well as Overlake Village and the Overlake Transit Center. D5 would not serve the Bel-Red Corridor at all.

Ridership: Forecasts predict 6,500 daily boardings for D2A in 2030, similar to all other D-segment alignments. We believe the forecasts will be higher for D2A once the city's land use changes for the Bel-Red Corridor are considered.

Transportation Impacts: D2A would have intersection impacts to at-grade crossings and limit some properties to right-turn-only movements, many of which can be minimized through design modifications. In comparison, D3 would limit access to a number of businesses along NE 20th Street and 152nd Avenue NE, and would require expansion of a number of intersections, and D5 may limit the ability to expand SR 520 consistent with regionally adopted plans.

Environmental Impacts During Operation: D2A, D2E, and D3 have relatively similar wetland and stream impacts in the NE 16th Street corridor and all present the opportunity to coordinate mitigation with city improvements to streams and wetlands as part of the Bel-Red Subarea Plan implementation. Beyond NE 16th Street, D3 has higher business displacements. D5 has higher habitat impacts and noise impacts, although these noise impacts can be mitigated.

Temporary Impacts During Construction: D2A, like D2E and D3, presents the opportunity to coordinate construction with the City's development of the NE 16th Street corridor, allowing both agencies to minimize disruption to surrounding property owners and sensitive users. Beyond NE 16th Street, D3 poses significant construction impacts without any additional benefit. In Overlake, construction impacts are relatively comparable between alignments.

Construction Risk: Construction risk would be low and offer the opportunity to coordinate with the City's development of NE 16th Street, as noted previously.

Segment E

Looking further east, we are in agreement with the City of Redmond on critical considerations in Segment E. First, we strongly agree that East Link must reach the Overlake Transit Center as part of this phase of East Link construction. We support Redmond's desire to provide interim bus rapid transit service near downtown Redmond to mitigate potential parking and traffic impacts associated with the interim terminus station and to build ridership for a future extension of East Link to downtown Redmond. Second, as described above, we support the D2A alignment with light rail travelling on NE 24th Street to a station on 152nd Avenue NE in the Overlake Village. Third, we view maintenance base MF-5 in downtown Redmond as the most desirable location. The three maintenance bases evaluated in Segment D are not consistent with the land uses envisioned for the Bel-Red Corridor. Given that the maintenance base will not be operationally necessary until East Link is extended to downtown Redmond, there is no funding included in ST2 for the base, and MF-5 is consistent with the surrounding land uses in Redmond, we see no need for a maintenance base site to be selected in the Bel-Red area.

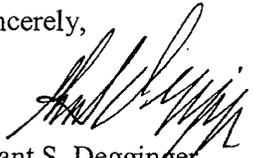
Moving Forward

The long-term benefits for Bellevue from light rail are significant for both the transportation system and the advancement of the land use and economic vision. Light rail is critical to reinforcing Bellevue's development as a metropolitan center for the region as well as a population, economic and cultural center of the Eastside. However, the benefits of the system cannot be achieved without some significant short-term disruption and inconvenience during construction and without making some long-term change to the existing environment. If done incorrectly, construction poses potential risk for long-term negative impacts. Proven techniques to avoid, minimize and mitigate these impacts should be employed to make the impacts

manageable. The longer-term changes that will be required to incorporate light rail into Bellevue will require careful balancing of community values, priorities, and trade-offs between long-term needs and benefits and the existing features. We are prepared to partner with Sound Transit to ensure that the project is developed as a net benefit for the local community, while minimizing impacts and providing meaningful mitigation.

The Council extends our appreciation to the Sound Transit staff for working extensively with the City, our residents and businesses to disseminate information and answer questions about the routing alternatives. Hundreds of Bellevue citizens and stakeholders took advantage of these opportunities to learn about East Link and provide comments directly to the Sound Transit Board. One of the key lessons learned in the Light Rail Best Practices effort was that on-going public involvement is essential for success in Bellevue. We look forward to continued collaboration on outreach efforts throughout the life of the project. We look forward to continuing to work closely with the Sound Transit Board and staff through your selection of a preferred alignment for the entire line and into the next phase of design work for the system.

Sincerely,

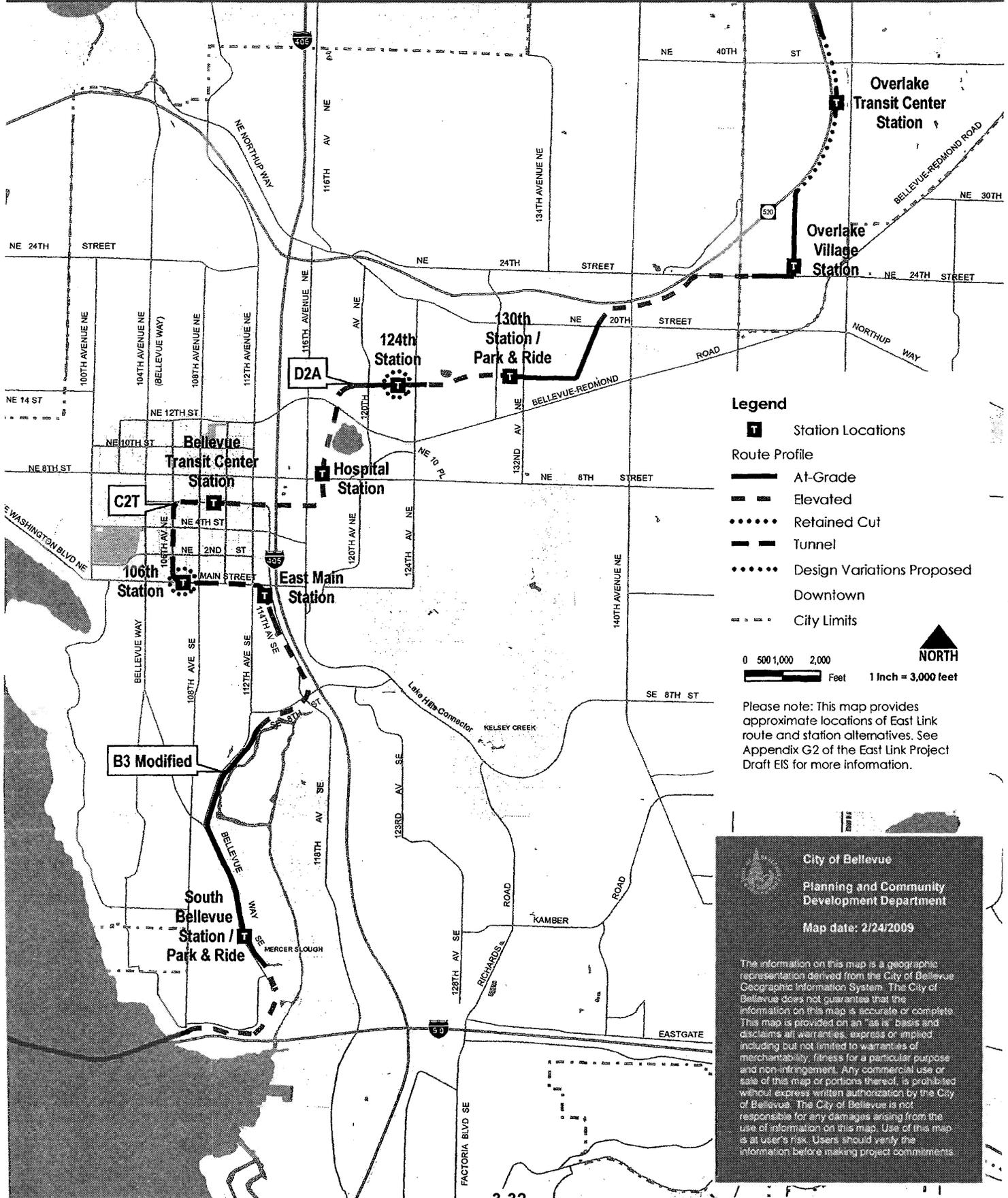


Grant S. Degginger
Mayor, City of Bellevue

Enclosures: Map of Bellevue's Preferred East Link Routing
DEIS comment memo to James Irish, Link Environmental Manager
City of Bellevue Staff DEIS technical comments

cc: Sound Transit Board
Bellevue City Council
Steve Sarkozy, City Manager
Goran Sparrman, Transportation Director
Matt Terry, Planning and Community Development Director

Bellevue's Preferred East Link Light Rail Route B3 Modified-C2T-D2A



Legend

- Station Locations
- Route Profile**
- At-Grade
- Elevated
- Retained Cut
- Tunnel
- Design Variations Proposed
- Downtown
- City Limits

0 500 1,000 2,000 Feet
 1 Inch = 3,000 feet



Please note: This map provides approximate locations of East Link route and station alternatives. See Appendix G2 of the East Link Project Draft EIS for more information.

City of Bellevue

Planning and Community Development Department

Map date: 2/24/2009

The information on this map is a geographic representation derived from the City of Bellevue Geographic Information System. The City of Bellevue does not guarantee that the information on this map is accurate or complete. This map is provided on an "as is" basis and disclaims all warranties, express or implied including but not limited to warranties of merchantability, fitness for a particular purpose and non-infringement. Any commercial use or sale of this map or portions thereof, is prohibited without express written authorization by the City of Bellevue. The City of Bellevue is not responsible for any damages arising from the use of information on this map. Use of this map is at user's risk. Users should verify the information before making project commitments.



City of
Bellevue

Post Office Box 90012 • Bellevue, Washington • 98009 9012

February 25, 2009

Mr. James Irish
Link Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

RE: East Link DEIS City of Bellevue technical review comments

Dear Mr. Irish:

The purpose of this letter is to formally transmit to Sound Transit the City of Bellevue's technical review comments on the East Link Draft Environmental Impact Statement (DEIS). The City recognizes the commitment of effort and resources by Sound Transit to conduct an environmental analysis on a project of this scale and complexity. We appreciate the additional time provided by the extended 75-day comment period and the collaborative approach to public involvement to reach out to a broad range of stakeholders. The City of Bellevue and Sound Transit have worked diligently over the course of this project to foster a strong working relationship that is respectful of our mutual and individual objectives. We look forward to building on this relationship as we jointly work through the City's comments on the DEIS to assist Sound Transit in developing a Final EIS that meets our mutual needs.

Since the release of the DEIS in December 2008, Bellevue staff from multiple departments have reviewed the document and its appendices in their respective areas of knowledge and expertise. Although the review produced over 700 comments (enclosed), the majority can be summarized in a few major themes arranged in the following categories: 1) factual corrections; 2) additional information and/or analysis needed; 3) mitigation; and, 4) consistency with City codes and policies. In addition, City staff have also provided comments on the VISSIM model developed as a supplement to the DEIS analysis of the C4A downtown Bellevue at-grade alignment.

1) Factual Corrections

Growth forecasts are reported inconsistently in various tables throughout the document. For example, the reporting of downtown population and employment growth is inconsistent compared to Bellevue's Downtown Implementation Plan (DIP) update and the Puget Sound Regional Council's (PSRC) current forecasts. Growth forecasts are a key component in land use analysis as well as transportation demand modeling. Preliminary conversations with Sound Transit and their consultants indicate that accurate data was used in the modeling. Bellevue staff will continue to work with Sound Transit to ensure the forecasts are consistently reported and applied in the Final EIS.

In Downtown Bellevue, the DEIS demand modeling assumes a less robust transportation system than that adopted in PSRC's Destination 2030 and assumed in the DIP update. For example, the DEIS acknowledges only partial I-405 improvements rather than the full highway expansion and I-405 Bus Rapid Transit. Without the full planned transportation system, staff are concerned that the DEIS underestimates traffic issues and transit ridership. We would like to work with Sound Transit staff to reassess the "reasonably foreseeable projects" included in the DEIS modeling to better reflect the planned transportation network and more accurately assess traffic impacts and transit ridership.

The City of Bellevue recognizes that the Bel-Red Subarea Plan was not adopted prior to preparation of the DEIS and therefore could not be analyzed in the DEIS. However, there are inconsistent references to the draft plan in the DEIS that should be resolved with a full analysis of the recently adopted Bel-Red Subarea Plan in the Final EIS. The Bel-Red Plan is predicated upon light rail serving the area and the two transit-oriented nodes at 124th Avenue NE and 130th Avenue NE in particular. The significant changes to land use and transportation in this area need to be factored into the planning and design of the light rail system as well as the analysis of impacts and mitigation. Bellevue staff will continue to work with PSRC and Sound Transit to provide updated figures and information for use in the land use and transportation demand modeling for the Bel-Red Subarea.

2) Additional Information and/or Analysis Needed

The vast majority of City of Bellevue comments fall into this category due in large part to the lack of detail and specificity in the DEIS about impacts. In short, the discussion of impacts is often too general, raising additional questions and making an assessment of impacts and mitigation difficult. A more thorough discussion of the full range of impacts will be informed by additional design (preliminary engineering) and is needed in the FEIS. A sampling of the issues, grouped by topic, follows.

Street Operations:

The assessment of street operations in the DEIS leaves many questions unanswered regarding street operations, signal timing, and distribution of traffic volumes. In downtown, additional factors that should be considered in the FEIS traffic analysis include increased pedestrian volumes, redistribution of traffic from closed driveways and the need for additional cycles to accommodate joint bus-light rail lanes on 108th Avenue NE and 110th Avenue NE.

Outside of downtown, U-turns and the effectiveness of traffic calming should be assessed fully in the FEIS. In the DEIS, most intersections show the same LOS for build and no build because of the forecasting model's limited ability to assess the magnitude of impact once intersections are failing (LOS F). Understanding the magnitude of congestion is critical to identifying appropriate mitigation and system management strategies. A more thorough analysis of street operations should be included in the FEIS, reflecting the updated street network for recently adopted City plans (e.g. Bel-Red and Wilburton) and evaluating intersections that are critical to the functioning of the overall street network, including those indirectly impacted by light rail (e.g. NE 8th Street and 116th Ave NE).

A thorough analysis of the street operations around station areas is also needed. At South Bellevue, the intensity of access and the sensitive land uses adjacent to the site require additional analysis. Southbound traffic capacity on Bellevue Way, access into and out of the expanded park and ride facility, bus transit and other vehicular traffic generated by the increased park and ride capacity and introduction of light rail should be factored in to fully assess impacts and identify appropriate mitigation strategies. In the area of the 118th Ave SE Station, additional analysis is needed of the operational impacts at the SE 8th St/118th Ave SE intersection in order to fully understand the magnitude of the impact from station volumes and identify adequate mitigation. Additionally, the DEIS has not analyzed the traffic impact on 118th Ave SE south of the station. 118th Ave SE is used as an alternative route to I-405 by drivers wishing to get to the I-405/Coal Creek Parkway intersection. The addition of park and ride traffic to the limited capacity of 118th Ave SE and the I-405/Coal Creek Parkway intersection will further increase delays. Additional analysis is needed to fully understand these impacts and identify appropriate mitigation. Finally, the 124th Ave Station in the Bel-Red Subarea merits further analysis in conjunction with the development of Spring District. Analysis should consider the function of the station with light rail at- or below-grade as well as impacts of the two options on the surrounding street network.

Neighborhoods:

The DEIS does not comprehensively analyze impacts to neighborhoods adjacent to alignments and staging areas. The DEIS presumes that because the routes are not bisecting or separating sections of neighborhoods, the neighborhoods are not impacted by the construction or alignment. For example, if residential or commercial buildings are removed from the perimeter of a neighborhood (e.g. south of Main Street at 112th Avenue SE, McCormick Park), residences that were interior to the neighborhood are now on the edge. The occupants of these buildings may experience a change in the surrounding environment and potential temporary impacts from construction staging areas (e.g. noise, lighting, parking, debris) and potential permanent impacts from noise and aesthetic changes. Proximity impacts on neighborhoods for both light rail construction and operation should be thoroughly evaluated in the FEIS.

Visual Quality:

The visual impact of the light rail line, especially elevated structures, is significantly understated, particularly in light of existing City policies and regulations addressing urban design, local context and character. There is inconsistent discussion of how the assessment arrived at its conclusions. There is also a tendency to apply a visual quality rating for one area to the entire segment, even though the profile, context and land use may vary along the alignment (e.g. 112th Avenue SE from SE 8th Street to NE 12th Street). A more thorough analysis of visual quality impacts, with more precise attention to context and local policies, is needed in the FEIS.

Parks:

The DEIS discussion of both permanent and temporary use of City parks is overly broad and dismissive of impacts. The discussion lacks detail about the duration of the use of parks and impacts on facilities and programs as well as planned park improvements. In particular, proposed mitigation for temporary use of parks needs further consideration

consistent with the City's preliminary views of potential park impacts included in Appendix D of the DEIS. There also should be a clear and firm commitment by Sound Transit to restore the parks to pre-construction condition or better.

The City also questions whether the lack of detailed analysis in the Evaluation of Avoidance Alternatives for McCormick Park, as required by Section 4(f), meets the federal regulatory standard for such analyses as codified at 23 CFR 774.17 under the definition of feasible and prudent avoidance alternative. Specifically, none of the conclusions regarding feasible or prudent avoidance alternatives are tested or proven by cost-benefit, level of service or other analytic assessment techniques.

Critical Areas:

More discussion of temporary and permanent impacts to wetlands, shoreline and other critical areas is needed as well as detailed mitigation measures to address these impacts. One area where the assessment should include additional analysis is in regard to how the project could impact the hydrology of the Mercer Slough as well as its recreational use. Mitigation should address value and function of impacted critical areas in terms of temporary and permanent impacts.

Construction:

The analysis of construction impacts is very general, often speaking too broadly to the impacts of various types of construction that may be used in the East Link project without addressing specifics by location or attempting to quantify the magnitude of construction impacts. While the City recognizes that a more detailed construction plan will be developed during final design, there are a number of areas that would benefit from more detail within the FEIS. For example, rather than simply noting that detours, lane closures and construction sequencing will occur, a specific assessment of the locations and impacts of such revisions should be included. This assessment should consider impacts to general traffic, pedestrian circulation, emergency response, and transit vehicles, including identifying any temporary reroutes, relocation of the South Bellevue park-and-ride, and additional or alternate layover locations.

Other major transportation projects such as the I-405 widening and the SR 520 reconstruction could be in their construction phases at the same time as the East Link Light Rail project. As a result, there could be significant adverse impacts on the Eastside transportation system from multiple closures, detours, haul routes and other construction-related issues. The FEIS should address project management and coordination of these major projects to identify and mitigate the cumulative impacts to the Eastside transportation system.

In addition to a more detailed assessment of traffic impacts during construction, the FEIS should provide more detail and fully evaluate the construction impacts on residences and businesses, including acknowledging the impacts to residences adjacent to the tracks and staging area. While these impacts are temporary, some will be of a notable duration and have the potential to adversely affect quality of life and the viability of businesses.

3) Mitigation

The DEIS offers specific measures in some sections and takes a “broad-brush” approach to mitigation in several others. A major infrastructure project like East Link will create a number of impacts and will require a variety of mitigation measures. Mitigation is needed to deal with short-term impacts such as the construction described above and long-term impacts usually related to the operation of light rail. A more detailed discussion of specific, proposed mitigation measures tied to the potential impacts is necessary to be able to evaluate the effectiveness of the proposed measures.

For example, mitigation measures that describe how construction management plans and construction sequencing could be applied in certain areas to minimize impacts to traffic and property access during street construction could be discussed in greater detail. Comments overall seek more detailed discussion of mitigation tied to specific impacts for issues including but not limited to staging areas; detours for traffic, transit and other modes; visual screening for construction and operation; street operations post-construction; temporary displacement of recreational facilities; and construction parking.

The “broad-brush” language appears to presume that standard mitigation will suffice. The City of Bellevue comments reflect the discussion in the Light Rail Best Practices Report that standard mitigation may not suffice in many instances. The Light Rail Best Practices Report includes many approaches used successfully by other systems and these should be incorporated into the East Link mitigation plan. Bellevue staff will work with Sound Transit to develop a comprehensive mitigation plan.

4) Consistency with City Codes and Policies

The DEIS makes the following statements (DEIS p. 4.2-12) related to consistency with local plans and policies:

"Because jurisdictions have the duty to accommodate the East Link Project, the stations associated with the project would be compatible with the jurisdiction's zoning."

"...it is assumed that Bellevue would accommodate the East Link Project, an essential public facility, by exempting the construction of a maintenance facility in the project permitting process."

The City of Bellevue recognizes that East Link is considered an essential public facility (EPF) under the Growth Management Act (i.e. cities cannot preclude the siting of an EPF). However, this does not exempt the project from analyzing the consistency with local plans and policies or from complying with applicable local codes. The DEIS lacks sufficient analysis of how the alternatives are consistent with existing city policies, plans and regulations. Bellevue’s Land Use Code (LUC 20.20.350) and Comprehensive Plan policies (CF-13, 14, 15 and 16) identify the approval process for EPF uses and require a conditional use permit. The permit process, including other local review and permits that will be required (e.g. Shoreline Development, right-of-way use, critical areas) should be addressed in the FEIS.

C4A VISSIM Model:

The VISSIM Model used to analyze the impacts to street operations with the C4A at-grade alignment as a supplement to the DEIS analysis is based upon assumptions that are inconsistent with city street management practices and Bellevue's updated Downtown Implementation Plan (DIP). Because the City would dispute many of the assumptions, we are concerned that the results of the analysis, suggesting that C4A would have minimal impacts to the downtown street network, are fatally flawed and do not represent a workable outcome for at-grade light rail in downtown. Assumptions of concern include:

- 1) Signal phasing: The green band for NE 4th Street and NE 8th Street is eastbound-only in order to provide more time for light rail trains. A two-way green band is needed to accommodate 2030 volumes, particularly on NE 8th Street where westbound volumes are expected to be similar to eastbound. By shortening the green band, the model assumes light rail train priority which may not be feasible or practical to provide, thereby impacting light rail travel times. Additionally, the left turn phasing may be more flexible than City practices allow due to concerns about safety and driver expectations.
- 2) Not all volumes in the Build and No Build scenarios are served in the model. Thus, there is more vehicle demand than the system can handle, forcing the city to make choices about how to provide signal operations in the oversaturated network. These choices would be limited by at-grade light rail. Assuming that the other vehicles are not served (for example, they are backed up on the I-405 mainline) in order to accommodate light rail trains is not a realistic assumption, given the impacts to the entire transportation network, i.e. to local streets, buses, trains, and highways.
- 3) The limited geographic scope of the model does not capture the full impacts of at-grade light rail. The downtown street network impacts and is impacted by streets and major intersections outside of downtown. While we recognize that a VISSIM model cannot be run for the entire city, the model should be designed to reflect the increased pressure on the downtown system from the expanded Bel-Red and Wilburton street networks and should evaluate key intersections adjacent to I-405, including NE 4th Street on the I-405 overpass and NE 8th Street at 116th Avenue NE.
- 4) The model does not fully reflect the impact of closing driveway access to parking garages and residential buildings to eliminate potential vehicle/light rail conflicts. In some cases, this may not be possible or practical and in other cases would require expensive building alterations to revise parking access. The re-route is only approximate in the model and does not account for the redistribution of traffic that would result from the closure and/or relocation of these driveways.
- 5) Of particular concern to both the City and Sound Transit, the model does not account for the impact of traffic congestion on at-grade light rail operations. Traffic volumes are projected to increase with or without light rail which will result in more frequent intersection delays along NE 8th and NE 4th Streets, the major east-west routes connecting downtown to I-405. The volume of traffic potentially could block intersections which

would also delay light rail service along the entire line. Accidents between vehicles and/or between vehicles and light rail would further increase delays at these intersections.

6) Further, the model does not test future expansion of the light rail system consistent with Sound Transit's adopted long-range plan. The City of Bellevue regards the East Link Light Rail Project as a long term, 100-year investment that should be able to accommodate future system expansion that will serve other Eastside destinations. Such expansion would increase the frequency of trains operating through downtown Bellevue; the increase in light rail frequency will impact signal timing, phasing and may limit the flexibility of the street system to accommodate increasing traffic congestion. Specifically, the model assumes a single train with nine minute headways. With extensions across SR 520 or north to Totem Lake, the number of trains and the headways would increase. Additionally, while the nine minute headway is assumed for purposes of the DEIS analysis, Sound Transit may wish to explore other operational scenarios in this extension of East Link, such as shorter, three-car trains with more frequent headways, which would also have consequences for the performance of light rail and street operations.

The City of Bellevue looks forward to continued cooperation with Sound Transit as the East Link FEIS is developed and in the subsequent implementation of the project. If you have any questions or would like clarification of the comments in this transmittal or the attached comments please contact Bernard van de Kamp, Regional Projects Manager, at 425-452-6459 or bvandekamp@bellevuewa.gov.

Sincerely,



Goran G. Sparrman, P.E.
Director, Transportation Department

Enclosure: East Link DEIS City of Bellevue technical review comment table

City of
Bellevue



Office of the Mayor • Phone (425) 452-7810 • Fax (425) 452-7919
Post Office Box 90012 • Bellevue, Washington • 98009 9012

January 10, 2010

The Honorable Aaron Reardon, Chair
Sound Transit Board of Directors
401 South Jackson Street
Seattle, Washington 98104

Re: Bellevue City Council response to the East Link Supplemental Draft Environmental Impact Statement

Dear Chair Reardon:

On behalf of the City of Bellevue, I am writing to provide the City's comments on the East Link Supplemental Draft Environmental Impact Statement (SDEIS). The East Link Project is a critical investment for the eastside and Puget Sound region, advancing significant land use goals and providing economic and community development benefits for generations to come. It is also an essential investment for the City, allowing continued growth of Downtown Bellevue as a business and residential center, supporting the transformation of the Bel-Red area into a vibrant mixed-use neighborhood, and providing high-quality transportation service to Bellevue neighborhoods. Through careful analysis of alignments, innovative design solutions, and thoughtful environmental and economic mitigation, we are confident that the East Link Project can be designed to protect neighborhoods and businesses and meet local and regional transportation goals.

The City Council has considered and discussed the SDEIS on several occasions since it was released in November. These discussions and the following recommendations are based on a foundation of past City efforts in support of East Link, including the Downtown Implementation Plan, the Bel-Red Subarea Plan, the Light Rail Best Practices Study and related Comprehensive Plan Updates, DEIS review and comment, and supplemental evaluation of design options, impacts, and mitigation in south Bellevue and Downtown. We ask the Sound Transit Board of Directors to incorporate and respond to these comments through the completion of the environmental review process and consider the City's issues as the Board continues to deliberate on a final preferred alternative.

In south Bellevue, the City of Bellevue's preferred alignment is B7. In November the City began phased, expedited, and independent work to revise the B7 alignment (B7-R), which among other things includes a station alternative near the I-90/Bellevue Way interchange (Attachment 1). The scope of work for the B7-R study is attached for reference (Attachment 2). In February or March we expect initial results to emerge and plan to share those findings with you. We anticipate completion of the first phase of our B7-R work to conclude in June. The objectives of the evaluation are to identify an alignment that minimizes negative impacts, reduces costs, and ensures high ridership as compared to the B2M alignment. The majority of the City Council does not support the B2M alignment because we are extremely skeptical that the impacts can be fully mitigated. We believe that this conceptual design work, ridership forecasting, and initial environmental analysis will contribute valuable information that may help to define a solution to East Link in south Bellevue. As a consequence, we ask that the Board allow the consideration of the forth-coming B7-R analysis prior to issuance of the East Link FEIS.

City of Bellevue offices are located at 450 110th Avenue N.E.

Bellevue continues to work with Sound Transit to advance our areas of shared preferences in downtown, from 110th Avenue Northeast and NE 4th Street through the Hospital Station, and in the Bel-Red area. The B7-R study analyzes shifting the tunnel portal from Main Street to NE 2nd Street. We are striving to find a workable solution to the C9T funding gap, as we believe a tunnel is necessary to support downtown Bellevue's continued growth as a designated Metropolitan Center. Conversely, we remain unanimously opposed to the C11A and C9A alternatives. As noted in Bellevue's technical comment letter, the SDEIS does not reflect our joint downtown Bellevue traffic analysis from last winter. This is a major shortcoming of the SDEIS that needs to be resolved because it was a significant factor in our joint decision making and shared alignment preference. While we are pleased that our preferences are shared in the Bel-Red area, the SDEIS does not sufficiently reflect the City's transit oriented development plans and the importance of these plans to the project and region. It is also apparent from the SDEIS that further design collaboration is needed to coordinate East Link with planned City transportation system investments.

The City remains concerned about the potential negative impacts of the East Link project. We are encouraged that the SDEIS promises comprehensive mitigation, but without more specific information about the mitigation it is impossible to evaluate its effectiveness and adequacy. For example, construction impacts, phasing, and mitigation are a major concern for the City Council and the community. We understand that the SDEIS cannot identify all lane closures, but more detail about the location and duration of lane closures should be included. Further analysis of different construction phasing options and trade-offs would provide the community with more information to evaluate alignment options. It is essential that specific proposals be made and included in the FEIS that better avoid, minimize, or mitigate negative impacts to roads, historic structures, parks, wetlands, and other sensitive areas. The City will require more specific and firm commitments to address these impacts than those implied in the SDEIS.

Noise impacts and mitigation are a primary concern for the City Council. Noise pollution has been a persistent problem for Central Link, and we are extremely concerned that East Link may experience similar problems. It would be unacceptable to subject Bellevue neighborhoods to excessive noise, whether from construction, passing trains, bells, or other light rail related sources. Specifically, we are concerned that the impacts are not fully identified in the SDEIS because the methodology averages light rail sounds over 24 hours, including hours where the trains are not operating. This is especially applicable to tonal, short-duration sounds such as wheel squeal, bells, and crossover tracks. We request additional analysis of potential noise impacts that more accurately reflects the sounds the community will experience.

Sound Transit must find a way to address all of the noise impacts, from construction and operation, whether occurring during busy daytime or quiet nighttime hours. The Council has recently reviewed the Sound Transit Link Noise Mitigation Policy (Motion No. M2004-08) and would like more detail about the steps Sound Transit will take to comply with the City's noise code. We would like to reiterate support for the methods noted in the policy, including complying with local noise requirements and the use of source treatment and path measures as preferred approaches to mitigation. Finally, we are pleased to hear of the upcoming Sound Transit noise analysis "best practices" study and would like to be actively involved, as we are hopeful the evaluation will identify innovative approaches to avoiding noise impacts.

The City has undertaken a number of studies to supplement Sound Transit's analysis, listed below. By including them with this comment letter, the City is formally submitting them into the environmental record, and the FEIS should address all of the major findings of the studies. We anticipate that further analysis of many of these issues will be necessary in later phases as the project is refined.

- Downtown Bellevue Light Rail Alternatives Analysis VISSIM Documentation Report, BKR Documentation Report, and Summary Presentation (City of Bellevue Transportation Department), January 2010
- Peer Review of the Segment B7 of Sound Transit's East Link Light Rail Project (David Evans & Associates, Inc.), July 2010
- South Bellevue Station Alternative Location Analysis (KPFF), July 2010
- Analysis of Potential Impacts from Sound Transit on Mercer Slough (OTAK), July 2010
- Acoustical Peer Review Concept Design Report – Noise Analysis 112th Avenue Light Rail Options (The Greenbusch Group), July 2010
- Technical Memo: Relative Impacts of Light Rail Alignments, B2M and B7, on Salmon (City of Bellevue Utilities Department), July 2010
- Sound and Vibration Peer Review SDEIS Proposed East Link Project (The Greenbusch Group), December 2010
- Bellevue Light Rail Best Practices Report (City of Bellevue), June 2008

Thank you for your consideration. We look forward to continued discussions to ensure that East Link meets the needs of Bellevue and Sound Transit.

Sincerely,



Don Davidson, DDS
Mayor

Cc: Sound Transit Board
Bellevue City Council
Steve Sarkozy, City Manager

Attachment 1: B7-Revised Map (November 2010)
Attachment 2: B7-Revised Scope of Work (November 2010)



Post Office Box 90012 • Bellevue, Washington • 98009 9012

January 10, 2011

Mr. James Irish
Link Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Attention: East Link SDEIS Comments

Dear Mr. Irish:

This letter transmits to Sound Transit the City of Bellevue's technical review comments on the East Link Supplemental Draft Environmental Impact Statement (SDEIS). The City recognizes the commitment of effort and resources by Sound Transit to conduct an environmental analysis of this scale and complexity. We appreciate the extended 60-day comment period and the strong and on-going partnership between the City and Sound Transit.

Bellevue staff from multiple departments reviewed the SDEIS and its appendices in detail. The attached table is a comprehensive accounting of staff's comments and are additive to our February 2009 comments on the DEIS. We anticipate working with you in the coming months to clarify any questions and to assist in addressing these comments prior to publication of the Final Environmental Impact Statement (FEIS). While all of these comments will need to be addressed in detail, we would like to highlight some of the most significant issues we see with the SDEIS:

Transportation and Traffic:

The City views implementation of light rail as an essential component of the future transportation system for Bellevue and the region. It will provide added capacity to a strained system and will serve as the backbone of the City's transit system. In order to fully realize its capacity and functionality, however, light rail must be introduced in a fashion that maximizes mobility, rather than compromising vehicular or non-motorized operations. In the winter of 2010 the City and Sound Transit jointly developed a micro-simulation model (VISSIM) to enhance the analysis of potential light rail alternatives in downtown Bellevue. This was a superior technique to the traffic analysis methods employed in the Draft Environmental Impact Statement (DEIS) because it allowed a finer level of evaluation of intersection operations in downtown. This analysis was a key element for City Council and the Sound Transit Board of Directors decisions regarding downtown alignment preferences. We are concerned that this analysis (summarized in the *Downtown Bellevue Light Rail Alternatives Concept Design Report*, February 2010) was not reflected in the SDEIS and we formally request that it be included in the FEIS. We believe that this analysis and subsequent city refinements portray a more accurate

depiction of future traffic conditions and best informs the integration of light rail into the downtown Bellevue transportation system. A series of attachments from the city's Downtown Bellevue Modeling work and a cover memo summarizing the information is attached to this letter.

Similarly, we are concerned that Sound Transit has not revisited the DEIS traffic analysis conducted for the B7 alternative ("BNSF"). During DEIS alignment preference deliberations it became apparent that the B7 alternative did not reflect the South Bellevue I-405 Project that modified the SE 8th Street/I-405 interchange. Further traffic analysis is appropriate for the B7 alternative to more accurately determine likely traffic impacts resulting from the development of a light rail station and park and ride in the vicinity of SE 8th Street/118th Avenue SE. Regarding other south Bellevue alternatives that would construct a light rail station at an expanded South Bellevue Park and Ride, we believe further analysis is needed to determine appropriate traffic mitigation. In particular, the SDEIS, like the DEIS, uses level of service measures that do not sufficiently reflect the impact of added traffic loads on the operation of key corridors, such as Bellevue Way, 112th Avenue SE, and 118th Avenue SE.

Ridership:

The ridership projections reported in the SDEIS, particularly in Bel-Red (Segment D), are not substantially changed from the DEIS. While the forecasts indicate that East Link will serve a large number of people in 2020 and 2030 we continue to be concerned that they underestimate the effect of the City's redevelopment plans. Bellevue anticipates major employment and population growth in downtown Bellevue and the Bel-Red Corridor by 2030. While the projected downtown growth was reflected in the DEIS, the City has since adopted the Bel-Red Corridor Plan. The Bel-Red Plan calls for dense, transit-oriented development surrounding the 120th and 130th stations. It does not appear that the Plan is accurately reflected in the SDEIS, as the ridership projections for Segment D increased only marginally between the DEIS and SDEIS. We are aware of the Sound Transit ridership model's "incremental" nature and believe that it underestimates future ridership in the Bel-Red corridor. We are concerned that inaccurate projections could result with inappropriately designed stations and other supporting infrastructure in the vicinity of stations.

Noise:

Noise impacts have been a major issue for the Central Link line and are of concern to Bellevue residents that could be exposed to noise from East Link. In reviewing the SDEIS we believe that further analysis of alternate crossover locations is justified. In many cases, the SDEIS proposes crossovers in locations that are close to sensitive receptors such as residential areas. It appears that there is a potential to relocate some of these crossovers away from these sensitive receptors and thereby reduce the impact of potential light rail noise pollution. We also believe that the range of potential noise mitigation methods should be expanded to include reduction at the source (e.g. train bells) and other techniques that reduce the need for tall and lengthy noise walls along the routes.

Another issue is the impact of noise on the City's park lands. According to the FTA, parks are a special case pertaining to noise impacts and local agencies should be consulted about park use. Surrey Downs Park has active and passive uses and Mercer Slough Park is almost exclusively passive. Bellevue believes that both of these parks should be considered sensitive noise receptors for environmental analysis. Further, the noise analysis should address all of the City parks near the various alignments and provide information and mitigation appropriate to their use. The City's Parks Department staff is available to consult with Sound Transit on this issue.

Finally, we are concerned that noise analysis focusing on FTA and FHWA noise regulations, which allow for averaging the noise from train operations over a 24-hour period, may understate the impacts of noise from bells, wheel squeal and track crossovers. The SDEIS does contain L_{max} information for these noise events, which information indicates that the noise associated with these events could be well above the maximum permissible sound levels allowed for other noise sources under the City's local noise control code, Bellevue City Code Chapter 9.18. The FEIS should contain an analysis of these noise events, based on predicted train schedules and the duration of each event, to ensure that these noise impacts are identified and mitigated consistent with requirements imposed on other noise sources in the City.

Visual:

Visual simulations of the project are valuable in showing the context, scale, and design of the project in key locations. We believe, based upon work conducted by independent consultants for the City in July 2010 (*Final Report for the City of Bellevue's Peer Review of Segment B7 of Sound Transit's East Link Light Rail Project*) that the environmental documentation would be improved by the use of the numerical rating system (1-7) for visual impacts and by the inclusion of visualizations from additional observation points. The City's consultants suggested two new visualizations of the B7 alternative, one looking north from the I-90 pedestrian and bicycle path through the Mercer Slough and another along the BNSF corridor. Additionally, the visual assessment methodology in the SDEIS does not capture all visual impacts because of the use of broad categories of visual quality, rather than a numerical rating. Finally, the lack of mitigation for visual impacts is a concern that should be addressed in the FEIS.

Parks, Wetlands, Sensitive Areas:

In reviewing the SDEIS it is clear that, regardless of the alternative, City parks, wetlands, and other sensitive areas will be impacted to some degree. While it is reassuring to see that Sound Transit is committed to mitigating these impacts, the City requires greater detail and a commitment to specific mitigation actions. We anticipate working closely with Sound Transit in the coming months to better define proposed mitigation so that specific actions are described in the FEIS. A specific concern is the calculation of the area of parks impact. It has recently come to our attention that right-of-way located in Mercer Slough may not have been calculated as park land. Under our reading of FWA Section 4(f), the rights-of-way within the park that are functioning as park land and deemed to be park land by Bellevue should be included in the park acreage calculations.

In addition, as we stated in our comments on the DEIS, the SDEIS contains insufficient analysis of the alternatives' consistency with local codes, including shorelines, critical areas and essential public facility requirements. The FEIS should include an identification of the permit processes applicable to East Link. City staff is available to help identify applicable code requirements if needed.

Construction:

As generally described in the SDEIS, East Link project construction will be a major undertaking. While much of the line will be relatively straight forward, there are areas where construction will be complex and high risk. We are particularly concerned about construction impacts to neighborhoods and businesses. The SDEIS suggests the potential need for partial or full street, sidewalk, and park-and-ride lot closures. For alternative C11A, this would also mean the temporary relocation of the Bellevue Transit Center. The construction of the C9T cut-and-cover tunnel will require a significant level of coordination between the City and Sound Transit. As the engineering on the project proceeds and the design becomes more refined, the City and Sound Transit will need to develop construction and mitigation agreements that address the phasing and management of the construction as well as more specific mitigation.

The impacts of the number, timing and duration of these closures on traffic and transit are of great concern to Bellevue and require further information, evaluation and mitigation. The City is highly reliant on these facilities for mobility and cannot afford long-term closures, nor is the City willing to accept traffic diversion into neighborhoods. Sound Transit should revisit its assumptions and consider alternate means of construction prior to issuing the FEIS. The impacts from construction noise that will continue over several years are also of great concern. The FEIS should include additional information about the potential location, duration and mitigation of construction noise. We expect that as design advances, Sound Transit and the City of Bellevue will work together to determine how to minimize construction impacts and to negotiate a formal construction agreement that outlines construction methods, responsibilities, and other project aspects that will balance bearable temporary community disruption and the efficient delivery of the project.

The potential for damage to the Winter's House is a significant issue for Bellevue. According to the City's consultant (Greenbusch, *Final SDEIS Peer Review*, 12/28/2010), "Predicted levels of vibration at the Winter's House during the excavation of the trench are at the threshold for damage to a sensitive structure." The SDEIS identifies "special measures" and monitoring during construction and the City will be seeking additional assurances from Sound Transit prior to construction.

Design:

The conceptual engineering provided as an appendix to the SDEIS shows the basic horizontal and vertical design of each of the new and modified alternatives. This five percent engineering provides a basic idea of the context of each of the alternatives. The typical cross sections for each of the alternatives do provide additional context and information. However, as noted in the *Final Report for the City of Bellevue's Peer Review of Segment B7 of Sound Transit's East Link Light Rail Project*, additional cross sections depicting conditions at more locations along the alignments would be helpful. The Peer Review indicated that additional cross sections would

better articulate the conditions for the B7 alignment, particularly along the BNSF right of way. We believe that additional cross sections would be useful to help reviewers better envision the design of other alternatives also.

In addition to the land use goals described above, the Bel-Red Plan adopted since the DEIS outlines a redeveloped street network to support new transit oriented development in the corridor; this new network does not appear to be recognized in the SDEIS. We are concerned that the proposed LRT guideway design that includes a “tiered” cross section on NE 16th Street between 132nd Avenue NE and 136th Place NE would make it difficult to implement the future street network as described in the Bel-Red Plan.

The SDEIS highlights multiple parcels that would be acquired by Sound Transit for the various alignments. More information should be provided about which are partial and which are full acquisitions of the parcels (the graphics and the text do not always agree); whether certain acquisitions could be reduced after further design (e.g. Stor-House facility on B-7); and plans for disposition of remnant parcels. This information has implications for project cost, environmental impacts and mitigation.

The City has undertaken a number of studies to supplement Sound Transit’s analysis, listed below. By including them with this comment letter, the City is formally submitting them into the environmental record. Many of these were previously provided to Sound Transit. For your convenience, these documents are included as attachments to this letter and also available on the City’s website at the following address: <http://www.bellevuewa.gov/light-rail-documents.htm>.

- Downtown Bellevue Light Rail Alternatives Analysis VISSIM Documentation Report, BKR Documentation Report, and Summary Presentation (City of Bellevue Transportation Department), January 2010
- Peer Review of the Segment B7 of Sound Transit’s East Link Light Rail Project (David Evans & Associates, Inc.), July 2010
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- Sound and Vibration Peer Review SDEIS Proposed East Link Project (The Greenbusch Group), December 2010

These comments are submitted by the City as part of the environmental review process and are not intended as final comments for purposes of the City’s review of permits that may be required over various stages of the project. Given the preliminary nature of the plans and information provided, these comments by no means represent an exhaustive review of code issues or impacts presented by the project. Failure to note an impact or the need for mitigation of such impact, or failure to identify potential conflicts with applicable codes and regulations is not a waiver of the City’s ability to raise such issues during subsequent stages of review.

Mr. James Irish
East Link SDEIS Comments
January 10, 2011
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The City of Bellevue looks forward to continued cooperation with Sound Transit as the East Link FEIS is developed and in the subsequent implementation of the project. If you have any questions or would like clarification of the comments in this transmittal or the attached comments, please contact Bernard van de Kamp, Regional Projects Manager, at 425-452-6459 or bvandekamp@bellevuewa.gov.

Sincerely,



Goran G. Sparrman, P.E.
Director, Transportation Department

Attachments:

1. Table of Bellevue comments on SDEIS
2. Supplemental City of Bellevue Studies listed above