

Comments and Responses on the DEIS

The DEIS was published on January 25, 2007. The minimum public comment period requirement is 30 days; however, it was extended to 45 days in anticipation of the considerable public interest the project would generate. Public comments were accepted through March 12, 2007. A public hearing and open house for the DEIS was held on February 15, 2007 at Bellevue City Hall. An additional open house was held on March 20, 2007 at Bellevue City Hall.

The City received a total of 70 written comments on the DEIS. All of the comments are reproduced in this chapter, along with written responses by the City. Reproductions of pages from the comment letters are shown side by side with the responses.

Comment identification numbers are shown in the left margin of each comment letter to distinguish separate comments. Responses with the name of the individual or organization that commented are numbered to correspond to the comments. For those individuals or organizations that commented multiple times, each comment response number is followed by a letter that differentiates that particular comment letter from others received.

Some responses are simply “comment noted” or “comment acknowledged.” Comment noted means that the responder doesn’t necessarily agree with the comment, and in some instances an explanation is provided. Comment acknowledged indicates that the responder agrees with the comment, and in most cases the FEIS has been modified accordingly based on the comment.

Comments



**Washington State
Department of Transportation**
Douglas B. MacDonald
Secretary of Transportation

Strategic Planning & Programming
Urban Planning Office
401 Second Avenue South, Suite 300
Seattle, WA 98104-2887
206-464-1260 / Fax 206-464-1266
TTY: 1-800-833-6388
www.wsdot.wa.gov

March 12, 2007

REC'D MAR 14 2007

Ms. Carol Helland
Bellevue Department of Planning & Community Development
P.O. Box 90012
Bellevue, WA 98009-9012

RE: WSDOT comments on the Draft Environmental Impact Statement for the Bel-Red Corridor Project

Dear Ms. Helland:

Thank you for giving The Washington State Department of Transportation (WSDOT) the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Bel Red Corridor. Rather than commenting on any given alternative, I would like to comment in general regarding state transportation issues connected with the redevelopment of this portion of the city. In the DEIS document, the city is evaluating the possible impacts of adopting new land use designations and zoning within the Bel Red corridor area. It is stated in the document that while the DEIS is programmatic in nature, air quality, noise, and transportation have been evaluated quantitatively by modeling to assess potential future impacts.

1 The city has done an extensive analysis for the local transportation network and its
operation status with the different alternatives. WSDOT would like to see a broader
transportation analysis that would also include potential impacts on the state
2 transportation system that may occur with the possible land use changes. SR 520 would
likely be the most affected by land use changes in this area with I-405 also being
impacted to a lesser degree. The DEIS transportation analysis should include freeway,
interchange and ramp intersection impacts. The intersection analysis for year 2030
conditions does not include the assumed ramp intersections at I-405 and NE 10th Street,
the existing and assumed ramp intersections at SR 520 and 124th Ave NE nor the
existing ramp intersections on I-405 and NE 4th St. and SR 520 at 148th Ave. NE.

Responses

WSDOT-1

The lack of a freeway analysis is consistent with other programmatic EISs on land use amendments the City has considered in the recent past, specifically the *Downtown Implementation Plan*, the Overlake Hospital Medical Center Expansion, and the NE 10th Street Extension Project. As specific transportation projects and/or development projects are proposed and developed, it is presumed that a Washington State Department of Transportation (WSDOT) freeway analysis will be conducted at that time, particularly in support of related studies such as the *Interchange Justification Report* associated with the proposed completion of the 124th Avenue NE interchange on SR 520.

WSDOT-2

As specific transportation projects and/or development projects are proposed and developed, it is presumed that Washington State Department of Transportation (WSDOT) interchanges will be analyzed at that time.

Comments

Ms Carol Helland
BelRed DEIS comments
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Page 2

The DEIS indicates that for all action alternatives that certain regional projects are assumed to be in place by 2030. These projects include:

- Completion of the I-405 corridor Master Plan improvements
- SR 520 Bridge Replacement and High-Occupancy Vehicle (HOV) project
- Construction of a full interchange on SR 520 at 124th Ave (adding an on-ramp connection from 124th to eastbound SR 520 and an off-ramp connection from westbound SR 520 to 124th Ave.)¹

WSDOT has identified the need for, and is committed to completing, the transportation improvements on I-405 and the bridge replacement and HOV work on SR 520. We have not identified the need, nor do we have foreseeable funding for, the SR 520 / 124th Ave. interchange improvements assumed in the Bell Red DEIS. While this proposed improvement does not conflict with the I-405 Master Plan of the area, it is not currently part of the Washington Transportation Plan (WTP). Current funding for the 20-year Washington Transportation Plan (WTP) period provides almost \$29 billion dollars for transportation investment. The 2003 (Nickel) funding package raises \$4.7 billion over 10 years and the 2005 Transportation Partnership Act raises \$9 billion over 16 years. Despite this significant investment, the Highway System Plan (HSP) (why reference the WTP in one sentence and the HSP in another?) projects nearly \$38 billion (2005 dollars) in unfunded need. The tax packages are very specific as to what projects will be funded and when they will be built. Barring any legislative action to the contrary, these two funding sources essentially spell out the State highway construction program for the next 20 years. The city may want to re-evaluate the transportation patterns for the action alternatives without this interchange improvement in place. If the city is able to fund this interchange improvement through other means, please keep in mind that any design elements for changes to SR 520 will have to be reviewed and approved by the state.

In general, the city should make clear that the currently unfunded improvements included with the different build alternatives are not a given. The assumption that unfunded projects will be completed has a large influence on the modeled impacts for each alternative. The document assumes all BROTS, City of Bellevue TFP, City of Bellevue DIP, and OHMC improvements will be in place. These are not currently funded projects and unless funding is secured and the projects are actually built, the transportation patterns and operations presented here will be significantly different. The document also assumes LRT is in place in this area with numerous stations. Again, this program is not currently funded nor fully defined in this area. The future of LRT in Bellevue will be subject to a public vote this November.

¹ On page 1-8 (last sentence), and page 10-1 (SR 520) the interchange improvements at 124th are not mentioned. However, several other references to regional projects assumed completed by 2030 have included the 124th interchange improvements (Figure 2-2, Table 2-2). For the purpose of this review, WSDOT is assuming the city has assumed the 124th interchange improvements are in place.

Responses

WSDOT-3

See response to WSDOT-2.

WSDOT-4

Most long-range planning efforts assume a set of transportation improvements that are both funded and unfunded. The DEIS clearly stated that unfunded projects were included in the analysis. Because this is a 20+-year plan, providing a vision for the corridor as opposed to approving specific development, the City did not want to constrain the analysis by excluding projects that may not have funding now, but that could potentially receive funding in the next 20+ years. The BKR model network assumptions are intended to be consistent with the Destination 2030 and the *Metropolitan Transportation Plan* for the central Puget Sound region at the time the Bel-Red version of the BKR model was developed (2005). The most influential regional projects on the Bel-Red corridor would include the SR 520 and I-405 improvements. The network assumptions for these two regional MTP projects are described on page 10-1 of the DEIS. The City will manage growth in the short term to ensure adequate transportation infrastructure is in place as development is approved through our concurrency system. Implementation strategies (e.g., phasing) will also be considered during drafting of the development regulations.

Comments

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Ms Carol Helland
BelRed DEIS comments
March 12, 2007
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Again, thank you for the opportunity to review and comment on this DEIS. I appreciate the hard work that has gone into the document and the difficulty of trying to plan for projects that have not yet received funding. If you have any questions, or would like additional clarification on any comment we have made, please give me a call at 206-464-1280 or send me an e-mail at washint@wsdot.wa.gov.

Sincerely,



Tom Washington
Senior Transportation Planner
WSDOT Urban Planning Office

Cc

David Andersen CTED 48350
Rocky Piro PSRC
Eric Philips / Bill Wiebe WSDOT 47370
Denise Cieri WSDOT

Comments

Page 1 of 3

O'Neill, Kevin

From: Washington, Tom [WashinT@WSDOT.WA.GOV]
Sent: Monday, March 12, 2007 1:04 PM
To: BelRed
Subject: BelRed DEIS comments from WSDOT

I have contacted Kevin O'Neill and let him know that we are sending these comments via e-mail to make sure you get them before the comment period ends. The original will be sent out today and you will receive it shortly.

Tom Washington

RE: WSDOT comments on the Draft Environmental Impact Statement for the Bel-Red Corridor Project

Thank you for giving The Washington State Department of Transportation (WSDOT) the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Bel Red Corridor. Rather than commenting on any given alternative, I would like to comment in general regarding state transportation issues connected with the redevelopment of this portion of the city. In the DEIS document, the city is evaluating the possible impacts of adopting new land use designations and zoning within the Bel Red corridor area. It is stated in the document that while the DEIS is programmatic in nature, air quality, noise, and transportation have been evaluated quantitatively by modeling to assess potential future impacts.

The city has done an extensive analysis for the local transportation network and its operation status with the different alternatives. WSDOT would like to see a broader transportation analysis that would also include potential impacts on the state transportation system that may occur with the possible land use changes. SR 520 would likely be the most affected by land use changes in this area with I-405 also being impacted to a lesser degree. The DEIS transportation analysis should include freeway, interchange and ramp intersection impacts. The intersection analysis for year 2030 conditions does not include the assumed ramp intersections at I-405 and NE 10th Street, the existing and assumed ramp intersections at SR 520 and 124th Ave NE nor the existing ramp intersections on I-405 and NE 4th St. and SR 520 at 148th Ave. NE.

3/13/2007

Responses

Comments

Responses

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Again, thank you for the opportunity to review and comment on this DEIS. I appreciate the hard work that has gone into the document and the difficulty of trying to plan for projects that have not yet received funding. If you have any questions, or would like additional clarification on any comment we have made, please give me a call at 206-464-1280 or send me an e-mail at washint@wsdot.wa.gov.

Sincerely,

Tom Washington
Senior Transportation Planner

3/13/2007

Comments

Responses

Page 3 of 3

WSDOT Urban Planning Office

Cc

David Andersen CTED 48350
Rocky Piro PSRC
Eric Philips / Bill Wiebe WSDOT 47370
Denise Cieri WSDOT

[1] On page 1-8 (last sentence), and page 10-1 (SR 520) the interchange improvements at 124th are not mentioned. However, several other references to regional projects assumed completed by 2030 have included the 124th interchange improvements (Figure 2-2, Table 2-2). For the purpose of this review, WSDOT is assuming the city has assumed the 124th interchange improvements are in place.

3/13/2007

Comments

O'Neill, Kevin

From: daryldiane@comcast.net
 Date: Monday, March 12, 2007 10:47 AM
 Subject: Bel-Red
 Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 10:46:35 AM

City: Bellevue
 Name: Daryl Wendle
 Address: 3212 99th Avenue NE
 Mailing List: Yes

Comments: All of the alternatives appear to assume that light rail would be the primary means for providing transit to serve the redevelopment area. Since it is not yet known where light rail would be located or when it would be implemented, I think that the Preferred Alternative should clearly identify the new bus network and service levels that would be needed to serve the community until light rail is implemented. This would help the city to request appropriate service improvements from Metro or Sound Transit, particularly if light rail is to be built in later phases, or if light rail ultimately follows another nearby corridor.

My other comment is about parks. It does not appear that "active" parks are included in the alternatives, although the EIS does identify an increased demand for park and recreation facilities would occur with an increase in population density. I also believe that many of the early scoping comments requested active parks be part of the alternatives examined. (Similar increases in demand for parks are already occurring as downtown increases its population.) The Bel-Red project should provide an active park complex or community center to help mitigate the impacts of this growth, and to avoid increasing the cumulative impacts on parks facilities in the rapidly growing western portions of Bellevue.
 Phone: WA
 Zip: 98004

Responses

Diane Daryl-1

All of the action alternatives in the DEIS assumed light-rail transit (LRT) would serve the Bel-Red area; however, all action alternatives assumed an aggressive rubber-tire transit network would support growth in the Bel-Red Corridor and provide access to LRT stations. The DEIS assumed some of the rubber-tire transit routing was changed (compared to the No-Action Alternative) to accommodate and link up with the LRT system. The City is aware that phasing of the Bel-Red redevelopment would need to be coordinated with the timing of the LRT system, and in the interim some additional rubber-tire transit may be warranted. This type of planning will be addressed during the implementation phase of the project and drafting of the development regulations, assuming the Preliminary Preferred Alternative is approved by the City.

Diane Daryl-2

The Preliminary Preferred Alternative includes several proposed park sites that could accommodate active recreation, including soccer fields.

Comments

O'Neill, Kevin

From: JimHunt@NWLink.com
Date: Monday, March 12, 2007 5:48 AM
To: BelRed
Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 5:47:42 AM

State: WA
 City: Kirkland
 Name: Jim Hunt
 Address: 12817 97th Ave NE
 Mailing List: Yes

Comments: Thanks for including non-motorized facilities in your future transportation system for the Bel-Red Corridor.

- 1 I do take issue with Page 10-6 section - "Nonmotorized Transportation" - were existing facilities are based on future completion of the 1999 Pedestrian & Bicycle Transportation Plan Update. For example, in 1999 - drafters of the update thought that Bel-Red Road would make a great bicycle corridor (flat, direct, etc). However, the City of Bellevue has not identified this road for any future nonmotorized Bicycle improvements in this Bel-Red Corridor Project Study or any other existing Transportation Improvement Plan.
- 2 Please update your descriptions & maps of current non-motorized facilities (Appendix F) to only include current actual identified non-motorized Bicycle facilities (ie reference 2005 State of Mobility Report-Bicycle Chapter Map) and non-motorized Bicycle facilities projects included in this project or on the Transportation Improvement Plan.
- 3 I feel that it distorts the value & potential for nonmotorized transportation in this area if roads with out adequate Bicycle accommodations such as Bel-Red Road (or sidewalks) are listed as viable Bicycle facilities.

Thanks,
 Jim Hunt
 Kirkland, WA
 JimHunt@NWLink.com

Zip: 98034

Responses

Jim Hunt-1

Due to limited right-of way and highly valued mature vegetation along Bel-Red Road, the Bel-Red Corridor Project looked for an alternate east-west bicycle route. The vision for that alternate route is the proposed extended NE 16th Street, which is planned to include bicycle and pedestrian facilities along its entire length, with connections to the Burlington Northern Santa Fe (BNSF) corridor and downtown Bellevue on the west, and to 140th Ave NE on the east – with connections to the SR 520 Bike Path.

Jim Hunt-2

DEIS Appendix F is intended to represent potential future nonmotorized transportation system improvements. The maps and project ideas in Appendix F may be used to inform the update of the *Pedestrian and Bicycle Transportation Plan*.

Jim Hunt-3

The figures included in Appendix F of the DEIS represent a potential future vision for the nonmotorized transportation system under the four alternatives analyzed in the DEIS, which acknowledges that the current facilities may not be adequate on all arterial streets, and is intended to demonstrate that, under the No-Action Alternative, improvements on arterials internal to the study area may be significantly less than under the action alternatives.

Comments

Responses

MAR 12 2007 9:44AM CITY OF REDMOND-EXECUTIVE NO.189 P.2/3



March 12, 2007

Carol Helland, Environmental Coordinator
Department of Planning and Community Development
City of Bellevue
P. O. Box 90012
Bellevue, WA 98009-9012

RE: Bel-Red Corridor Project: Request for Public Comment on the Draft Environmental Impact Statement

Dear Ms. Helland,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Bel-Red Corridor Project. The following comments highlight the City of Redmond's key comments and issues of concern regarding the environmental analysis for the Bel-Red Corridor Project.

1 **Land Use and Assumptions**

2 We noted from the Draft EIS that the type of land uses proposed at the eastern end of the Bel-Red Corridor are consistent with Redmond's vision and adopted plan for Overlake. We also appreciate the emphasis in the proposal and DEIS on environmental sustainability, and see opportunities for collaboration between our two cities on this topic.

3 Regarding concerns, it is unclear from the Draft EIS what land use assumptions were used for the City of Redmond. From previous conversations with Bellevue staff, we understood Bellevue's intent to rely on the 2003 Puget Sound Regional Council's (PSRC) land use forecast to approximate potential 2030 conditions for the City of Redmond. As part of conversations with Bellevue staff beginning in the summer of 2005, we've expressed our concern that the 2003 PSRC forecasts are unrealistically low for employment. For the City of Redmond, the 2003 forecast suggested an increase of only 2,400 additional jobs throughout Redmond between 2022 and 2030. This amount of job growth isn't realistic for this period and does not reflect Redmond's adopted 2022 land use targets or potential for growth in Overlake beyond the current BROT's (Bellevue Redmond Overlake Transportation Study) agreement. The PSRC subsequently released updated forecasts in October 2006.

4 While we recognize the issues of timing and reliance on adopted regional forecasts that led to use of the PSRC forecast, we also believe it critical as we discussed to bring together the preferred land use and transportation alternatives for the Bel-Red Corridor and Overlake, identify any additional transportation needs, and work together on a phasing and implementation strategy.

City Hall • 15670 NE 85th Street • PO Box 97010 • Redmond, WA • 98073-9710

City of Redmond-1

Comment acknowledged.

City of Redmond-2

Comment acknowledged. Bellevue concurs that there may be opportunities for the two cities to collaborate on environmental enhancements to the overall Bel-Red and Overlake areas.

City of Redmond-3

The City of Bellevue used the most up-to-date PSRC land use forecasts when the DEIS transportation modeling was done. The PSRC's 2003 Small Area Forecasts were used as 2030 baseline land use inputs for Bellevue TAZs as well as for land use inputs for the City of Redmond and other surrounding jurisdictions. The PSRC's 2006 Small Area Forecasts were not finalized prior to the substantive transportation modeling work done in the DEIS. The 2003 PSRC Small Area Forecasts are used as the base for the transportation modeling in the FEIS for comparison purposes back to the work done in the DEIS.

City of Redmond-4

Comment acknowledged.

City of Redmond-5

The local transportation improvements assumed for the No Action and all the action alternatives (including the preliminary preferred alternative) in the Overlake area of Redmond are consistent with the May 2003 BROTS North-South Corridor Study. These improvements include the 152nd Avenue NE Extension over SR 520 and the eastbound ramp from SR 520 to 152nd Avenue NE.

Comments

Responses

MAR. 12. 2007 3:44PM CITY OF REDMOND-EXECUTIVE NO. 189 P. 3/3

Transportation Assumptions

The City of Redmond requests that the EIS identify any local transportation network improvements in the Overlake area of Redmond included in the 2030 model that are assumed to be implemented by 2030 in all alternatives, including the no action. Much like other regional and local transportation improvements identified on page 10-1 and 10-2 of the Draft EIS, network improvements in the Overlake area could potentially impact the transportation performance measures included in the DEIS. As part of our scoping letter in December 2005, we requested that the City of Bellevue coordinate with surrounding jurisdictions, including the City of Redmond, regarding transportation network assumptions for local and regional improvements. This did not occur and we understand from Bellevue staff that the draft EIS assumes construction of the SR 520 slip ramp at 148th Avenue NE and other transportation network improvements that are not reflected in current City of Redmond plans.

Page 10-24 of the Draft EIS includes mode split information for the Bel-Red Corridor. The City of Redmond is concerned that this under estimates the number of carpool trips occurring in all alternatives analyzed in the Draft EIS and as a result would impact the amount of trips being made by other modes. The estimated 4 to 5 percent described under all alternatives is inconsistent with current trends or forecasts prepared as part of various regional plans and studies.

Appendix G of the Draft EIS, which identifies intersection improvements included in each alternative, is difficult to use to identify which intersection improvements go with which intersection and alternative.

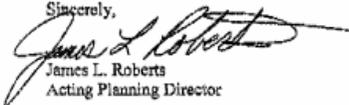
Much of the remaining transportation analysis is consistent with the City of Redmond's transportation planning related efforts, in particular Redmond's Overlake Neighborhood Plan Update. The assumptions in the Draft EIS related to the light rail planning, regional projects included in the 2030 model, and the consistent use of the Bellevue Kirkland Redmond Modeling platform are all consistent between the two planning efforts.

Public Services and Utilities

The draft EIS does not indicate that the cities of Redmond and Bellevue in part share the same water supply and storage system. In addition, the draft EIS does not describe anticipated impacts to supply and storage, and only mentions that the existing plan shows a storage deficit in the west area and a storage surplus in the east area. The EIS is also silent on potential impacts to the regional sewer system from the potential growth in the Bel-Red Corridor.

Again, thank you for the opportunity to comment. If you have any questions regarding our comments, please contact Lori Peckol at 425-556-2411 or lpeckol@redmond.gov or Joel Pfundt at 425-556-2750 or jpfundt@redmond.gov.

Sincerely,



James L. Roberts
Acting Planning Director

N:\Bel-Red Planning\Correspondence\Bellevue\Letter to Bellevue - Draft EIS.doc

City of Redmond-6

The mode split information summarized on page 10-24 of the DEIS did not provide complete information, which was available from the transportation modeling work conducted for the project. It should have indicated that the mode share results were Daily Home Based Work Person Trips for the Bel-Red Study Area only. In the No Action Alternative, 86% of person trips are drive alone, ride-sharing comprises 5%, and trips by transit make up 8%, including trips on transit from walking and from park and ride lots. The comparable information for the three action alternatives is 75 to 80% drive alone, 4 to 5% shared ride, and 13 to 18% by transit. The important point to be drawn from the mode choice modeling result is that the transit mode share would grow by double as a result of the action alternatives over no action, while the carpool share would remain about the same.

The mode share information was provided by the City of Bellevue's BKR (Bellevue-Kirkland-Redmond) travel demand model. Two different modeling platforms are relevant to the data reported in the DEIS, existing conditions for the year 2003, and forecast conditions for 2030. The BKR existing conditions model is annually updated by the City and calibrated against household survey data provided by the Puget Sound Regional Council (PSRC), actual traffic volume counts, and transit rider counts reported by transit agencies. The relevant existing conditions BKR model is documented in the report, 2003 Base Year Bellevue-Kirkland-Redmond Model, prepared by the Bellevue Modeling and Analysis Group in June 30, 2005. The 2030 BKR forecast model is documented in the report, 2030 Bellevue-Kirkland-Redmond Model Development prepared by Pertee Engineering April 27, 2004 and updated by Bellevue Modeling and Analysis Group in 2005. Although it is difficult to know what modes of travel people will choose to use twenty-plus years from now, it is important to point out that the BKR model provides a forecast that is based on actual existing conditions. That is a more technically sound approach than assuming an estimated future condition as the comment suggests.

Comments**Responses****City of Redmond-7**

Appendix G has been reformatted to more easily correlate which intersection improvements go with which intersection and alternative. An Excel spreadsheet version of Appendix G is on the Bel-Red Corridor Project web site.

City of Redmond-8

Redmond and Bellevue do share ownership, operation, and maintenance responsibilities for existing water storage reservoirs that provide water to a large area, including the Bel-Red Corridor. Responsibilities and costs for these facilities are shared, based on established inter-local agreements. Redmond and Bellevue also have a common regional water supplier and access water off of the same regional supply line owned by Seattle Public Utilities.

As stated in the DEIS, Bellevue forecasts supply inlet capacity and drinking water storage deficiencies in the West Operating Area (OA), with surplus storage and sufficient inlet capacity for the East OA, even with the No Action Alternative. The Bel-Red Corridor project area includes portions of both OAs. Increases in allowed land use density will result in higher demand forecasts to the water system to support the additional employment and population growth. The storage needs may be met or partially met by increasing transmission capacity between the west and east OAs, or by constructing additional storage. New supply inlets or improvements to existing inlets will be needed eventually. Required capacity will be calculated based on the recommended land use; options for specific improvements will be identified when the demand is quantified, as part of ongoing comprehensive planning.

Increases in wastewater flow in King County-Metro's regional conveyance lines would be incremental and likely not significantly different than their forecast regional flows.

Comments

Responses

03/13/2007 08:57 4255465813

LEGACY

PAGE 01/02



March 12, 2007

Carol Helland
 Bellevue Department of Planning & Community Development
 City of Bellevue
 P.O. Box 90012
 Bellevue, WA 98009-9012

RE: Bel-Red Corridor Draft EIS Input

Dear Ms. Helland:

Legacy Commercial, LLC is asset manager for several properties within the Bel-Red Corridor Study Area. Specifically, we represent the owners of Design Market, a shopping center located at 1014 116th Avenue NE, and Kelsey Creek Industrial Building, located at 1919 120th Avenue NE. We respectfully submit the following comments both on behalf of the specific properties' owners and as citizens and stakeholders with a long-term interest in the overall health and vitality of the City of Bellevue.

1 We support development opportunities for expanding the medical office corridor along 116th Avenue NE. The medical industry generates highly skilled employment and is environmentally clean. It is important for the City of Bellevue to promote the City's position as the regional Eastside medical center to prevent other areas (i.e. Issaquah or Kirkland) from assuming the natural growth in this industry.

2 However, many properties in that area are not underdeveloped, as the report states, and existing uses generate significant economic value to the property owners. Therefore, revised land use codes stemming from a future rezone will need to provide generous development intensities for property owners to convert the existing uses to medical offices.

3 Based on existing land values in the area surrounding OHMC, the four to six story building heights mentioned on page 2-13 would not provide adequate financial incentive for property owners to convert from existing uses to medical office uses. The densities and heights would need to match those within the Medical Institution overlay district (i.e., 140 feet) to provide an incentive to redevelop the property.

4 Increased densities and heights would be appropriate for those properties immediately adjacent to the overlay district, and in fact may be necessary in order to mitigate the high construction costs associated with sub-grade parking in the vicinity of Lake Bellevue due to a relatively high water table. Additional structure heights will not further impair views of future residential or commercial developments in the area. One advantage of high-density development in the western portion of the Bel-Red study area is that the

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 Bellevue, WA 98004
 p. 425.450.2300 f. 425.646.9013

Legacy Companies-1

The market conditions analysis, the economic vitality principle, and market feasibility objectives for the project recognize the potential to build on key strengths in the corridor, which include proximity to Overlake Hospital. The Preliminary Preferred Alternative maintains and expands the medical office corridor on 116th Avenue NE to leverage the expansion of Overlake Hospital and build on the critical mass of medical office uses in the area. The "Medical Office" district is envisioned to emphasize medical offices, but also incorporate other types of office, as well as some compatible retail uses, as is also consistent with the Draft .

Legacy Companies-2

Any potential new zoning in the corridor will take into account the level of additional development intensity that is (1) needed to trigger new development based on market conditions and (2) needed to provide an incentive for developers to invest back into the subarea with public infrastructure and amenities. Any potential density increases and additional height allowances above what is currently allowed will be done through an incentive system. Refer to Appendix C of this FEIS for the Buiding Height Analysis.

Legacy Companies-3

See response to Overlake Hospital-2.

Comments

Responses

03/13/2007 08:57 4256469013

LEGACY

PAGE 02/02

"wedding cake" design constraints of the Downtown are not as applicable due to the absence of low-rise and single family housing.

There are additional reasons to support higher densities in this area. Higher densities will be necessary for the City of Bellevue to maintain a competitive advantage over other Eastside cities as the premier location for medical related uses. Because the supply of land adjacent to OHMC is extremely limited, densities should be increased to ensure future supply of facilities. In addition, greater density will leverage transportation infrastructure investments, minimizing surface gridlock in the Bel-Red Corridor.

We maintain that resolution of future densities in this area may well be the most significant part of the Bel-Red Comprehensive Plan revision package.

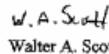
We support having LRT cross I-405 at NE 12th Street, with a station at NE 12th Street and 116th Avenue NE. A station at this location would serve several purposes. First, it would provide a station adjacent to what will probably be the greatest number of jobs in the area. Second, it will not conflict with future uses on the BNSF right-of-way. We support the location because it provides access to the new, dense residential projects currently under construction in the Ashwood neighborhood, and believe a station at NE 12th Street will align well with the proposed NE 16th "green boulevard".

We support the proposed widening of 120th Avenue NE between Northrup and NE 8th. Improving vehicular access into and out of the Bel-Red Corridor from SR 520 will obviously be necessary as development densities increase in the area and access from I-405 becomes more difficult. However, the road's design needs to accommodate safe and convenient northbound and southbound access to and from existing businesses along 120th NE. This is consistent with the study's core commitment to build from existing assets.

Sincerely yours,



David C. Sharp



Walter A. Scott

cc: Thomas A. Ellison

Legacy Companies-4

See Legacy Companies-1. The potential for building heights up to 150 feet within transit nodes (1/4-mile radius from stations) in the Bel-Red Subarea has been analyzed in this FEIS (please see Appendix C).

Legacy Companies-5

See response to Legacy Companies-1 or Overlake Hospital-2. As noted in the DEIS, the highest development intensities would be located in areas closest to Overlake Hospital Medical Center. The Preliminary Preferred Alternative includes a light rail station and development node in proximity to Overlake Hospital Medical Center.

Legacy Companies-6

See response to Legacy Companies-1 or Overlake Hospital-2. The specific maximum densities and the distribution of development intensities allowed by zoning are indeed critical to achieving the vision identified by the Bel-Red Corridor planning process.

Legacy Companies-7

The Preliminary Preferred Alternative shows three potential station locations in the vicinity of Overlake Hospital: NE 8th St/116th Ave NE; west of Lake Bellevue on the Burlington Northern Santa Fe (BNSF) corridor; and NE 12th St/I-405 (on a platform spanning the freeway). The Sound Transit Board has the ultimate decision-making authority on the alignment and stations for the light rail system. The station locations included in the Preliminary Preferred Alternative correspond to the station locations Sound Transit is evaluating in its EIS for the East Link light rail corridor.

Legacy Companies-8

Improvements proposed to 120th Ave NE include widening to five lanes between Northrup Way and NE 8th Street, plus pedestrian and bicycle facilities.

Comments

Responses



1035 116th Avenue NE
 Bellevue, WA 98004
 (425) 688-5000
 www.overlakehospital.org

RECEIVED

MAR 12 2007

Development Services

March 7, 2007

Carol V. Helland
 Environmental Coordinator, City of Bellevue
 PO Box 90012
 Bellevue, WA 98009-9012

Subject: Bel-Red Draft Environmental Impact Statement

Dear Ms. Helland:

As you know, Overlake Hospital Medical Center is an independent, nonprofit regional medical center and the only hospital in Bellevue. Assuring good access to, into and through the Overlake Hospital Bellevue campus for emergency vehicles, patients, families, physicians and staff is vitally important to serving our community. Last year, nearly 18,000 people were admitted to Overlake as inpatients and another 250,000 outpatient visits occurred. More than 50,000 of these patients were cared for in our emergency department. Bellevue Fire Department Emergency Medical Response Unit is located on our campus in order to be in close proximity to that emergency department and Group Health will be completing their Eastside Specialty Center in 2008, providing additional medical services to the community.

1 First, we would like to congratulate the City of Bellevue for embarking on this
 long range planning effort. We are supportive of continued efforts to provide
 more opportunities for people to live and work in the area, and we believe that
 the Bel-Red Corridor provides a very unique opportunity to this end. We are
 2 encouraged that the DEIS includes the designation of the "medical office district"
 on both the east and west sides of 116th Street. We encourage the city to
 consider zoning for this district that includes increased heights and increased lot
 coverage, similar to the existing Medical Institution District.

3 As we stated in our letter to the Sound Transit Board during the East Link
 Scoping process, we must have a light rail transit station that services the
 medical district. Our strong preference continues to be the station that spans I-
 405 on NE 12th Street. We feel that this will best contribute to improving the flow
 of traffic in and around Overlake and Group Health. It is uniquely situated to
 provide safe pedestrian access to the campus without hindering the flow of traffic
 on 116th Avenue due to frequent pedestrian crossings.

Overlake Hospital-1

Comment acknowledged. Long-term, comprehensive planning for the Bel-Red Corridor is embodied in the Council principles established at the beginning of this project to guide the steering committee, staff, and consultants.

Overlake Hospital-2

In the Preliminary Preferred Alternative, the Medical Office district is envisioned to accommodate office and some retail uses, with a focus on medical office uses. A range of land use intensities and building heights are anticipated, including potentially higher intensity land use and taller buildings in the vicinity of a potential light-rail transit (LRT) station near Overlake Hospital Medical Center. Potential heights and intensity is also consistent with that analyzed in the Final EIS for the Overlake Hospital Master Plan/NE 10th Street Extension published in February 2005. Specific dimensional standards have not been developed at this time, but will take into account height analysis prepared in this FEIS (please see Appendix C).

Overlake Hospital-3

See response to Legacy Companies-7.

Comments

Subject: Bel-Red Draft Environmental Impact Statement
 March 7, 2007
 Page 2

4 We also are very supportive of an SR 520 and 124th Avenue NE interchange with construction of new ramps to and from the east. We believe that this will lessen the impacts of traffic on NE 10th and the new ramps to 520. Our primary objective is to ensure that both 116th and NE 10th traffic impacts do not impede access to and from the hospital by both emergency vehicles and patients - at any time.

5 Finally, Alternative 3 shows a LOS F at the intersection of 10th and 116th. This is not acceptable. We are a critical community service provider and the safety of our neighbors who require emergency medical care cannot be sacrificed to traffic delay. Long delays and excessive queues that prevent access to either Overlake or Group Health are not acceptable.

Again, we applaud the City for this effort and we thank you for the opportunity to provide comments.

Sincerely,



Janet Donelson, VP of Facilities
 Overlake Hospital Medical Center

cc: Craig Hendrickson
 Caitlin Hillary
 Sarah Langton

Responses

Overlake Hospital-4

Improvements proposed to 124th Ave NE include widening to 5 five lanes between Northup Way and Bel-Red Road, plus an interchange with SR 520 that includes access to and from the east.

Overlake Hospital-5

Comment acknowledged. The City will explore additional mitigation that could be implemented when the NE 10th Street Extension is being designed to enable the intersection to operate at a better level of service. Nevertheless, it should be recognized that in an emergency situation, ambulances will not be required to wait through numerous signals and long queues, because these signals will be equipped with emergency vehicle detectors that give priority to these vehicles.

Comments

Responses

Coca-Cola Bottling Company of Washington

• COCA-COLA ENTERPRISES COMPANY

March 12, 2007

1150 124th Avenue NE
Bellevue, WA 98005
425 453-2020
425 453-7789 Fax

Ms. Carol V. Helland
Environmental Coordinator
City of Bellevue
PO Box 90012
Bellevue, WA 98009

Re: *Local Coca-Cola Bottling Company of Washington DEIS Comments*

Dear Ms. Helland:

Thank you for the opportunity to comment on the Bel-Red Corridor Project Draft Environmental Impact Statement ("DEIS"). As indicated in prior public comments and presentation to the Steering Committee, the Coca-Cola Bottling Company of Washington ("CCBCW") has made a significant investment in this uniquely located site and looks forward to being part of the long-term vision for this area. Set forth below are CCBCW's comments on the DEIS.

Introduction and Summary-Alternatives:

Properly, the DEIS does not select a preferred alternative. If the Steering Committee recommends a preferred alternative in the FEIS, we encourage the selection of an alternative that allows CCBCW to stay and grow as a permitted use and that protects it from incompatible, encroaching uses. Based on the alternatives in the DEIS, we think there are several good options. Alternative 2 appears most closely to meet our objectives by preserving a Light Industrial sanctuary. Alternatively, it is possible that the LI sanctuary could also be combined into Alternatives 1 or 3. Finally, it is possible that the final EIS could explore new alternatives, such as an overlay district. Under any of these scenarios, we think we can make a positive contribution to the Bel Red area as the process goes forward.

Land Use:

Clarify that CCBCW may remain as a permitted use under each alternative.

As previously stated, we do not want to become a nonconforming use under the comprehensive plan or development regulations. Therefore, we urge you to choose a preferred alternative that allows CCBCW to stay and thrive at the Bel-Red site as a permitted use. It is our understanding that Alternatives 2 and 3 assumed our continued use for purposes of the DEIS analysis. Staff has indicated, however, that the DEIS did

Coca-Cola Bottling-1a

The FEIS includes analysis of a Preliminary Preferred Alternative, which does not include the idea of a Light Industrial Sanctuary (as was shown in Alternative 2 of the DEIS). The Bel-Red Corridor Project Steering Committee will make a determination of their Final Preferred Alternative following release of the FEIS. The steering committee's vision for existing "traditional" light industrial uses, such as Coca Cola Bottling, is that they be allowed to continue by current and future owners, to expand existing structures, and to reconstruct destroyed structures. However, no new "traditional" light industrial uses would be allowed in the corridor, and discontinued uses would not be allowed to reestablish. This direction will be further analyzed by the Planning Commission and City Council during preparation of the implementation strategy and development regulations.

Coca-Cola Bottling-2a

Following selection of a Final Preferred Alternative, City of Bellevue staff will develop the implementing regulations consistent with the Steering Committee's vision, for consideration by the Planning Commission and City Council. "Traditional" light industrial uses, such as Coca Cola Bottling, will not be considered "non-conforming" uses. The terminology that describes an existing use that is allowed to continue and expand its structure, when new uses of its type are not allowed, is currently not contemplated in Bellevue's Land Use Code. New terminology will be developed to permit existing light industrial uses to remain in the Bel-Red Corridor.

Comments

not go to the level of discussing whether the use would be permitted outright. We think this is a critical issue, as the intent of the selected alternative is to guide the long range vision for the area. Non-conforming uses in Washington are disfavored, and nonconforming use status presents endless problems for businesses that find themselves in that unfortunate situation.

Clarify some industrial uses may grow.

3 Another clarification that is needed is with regard to Table 7-2, which is confusing. It indicates “0” new square feet of development under all alternatives. While there may be a net decline, we assume that there could be some individual uses such as ours that actually grow. Please clarify that individual uses could grow.

Identify Land Use Displacements, if known.

4 The DEIS indicates that the transportation improvements required by the various alternatives will result in land use displacements. The number of property owners affected is mentioned, but the actual uses affected are not. Obviously, we would like to know if our use is in the path of any transportation improvement, if that is known.

5 In summary, we ask that the FEIS clarify the assumptions as to our use remaining and make it clear that we could remain as a permitted use that is supported by adopted policy and regulations so that we may thrive and grow.

Transportation

One of the key pieces for the Steering Committee and future City decisionmakers will be the Transportation analysis. CCBCW has retained The Transpo Group to review the DEIS. A letter report with comments on the DEIS section is attached.

Appendix A: Include Prior Comments from CCBCW.

6 The DEIS notes that there has been a public involvement process. *See*, Public Involvement (DEIS at p. 1-7). CCBCW has participated in this process by appearing at hearings and by submitting public comment letters. Yet, Appendix A did not contain any of our prior comment letters. We request that the FEIS update the Public Involvement Appendix to include our comments.

Appendix B: Revise to reflect that CCBCW use is a significant contributor to the economic vitality of the area.

7 We have previously commented on the economic study in that it does not convey the importance of individual, light industrial uses such as our own. Unfortunately, the DEIS seems to perpetuate this same view that all industrial uses are dying and moving out of Bellevue. This is not the case.

CCBCW employs hundreds of people directly in its operations, but thousands more are employed by businesses in Bellevue and throughout the Puget Sound region that

Responses

Coca-Cola Bottling-3a

See response to Coca Cola Bottling-2a. Table 7-2 in the DEIS referred to net new development and net loss by land use type. For industrial, the No-Action Alternative contained 300,000 new square feet, while the three action alternatives each had a net loss of 2,690,000, 1,980,000, and 2,490,000 square feet, respectively. The net loss numbers for industrial assumed that there would be significant loss in that land use category, but that some existing uses would be expanded.

Coca-Cola Bottling-4a

In Chapter 10, Figures 10-6 through 10-8 depict the actual transportation improvements that are discussed in the Land Use chapter. Because these improvements are at a highly conceptual level of design, it is not possible to say with certainty which businesses would be impacted. Therefore, specific businesses are not listed, which is consistent with the programmatic nature of this EIS. As transportation projects are designed and implemented, project-specific State Environmental Policy Act (SEPA) documents will be completed that would identify specific businesses impacted.

Coca-Cola Bottling-5a

See response to Coca Cola Bottling-2a.

Coca-Cola Bottling-6a

Appendix A of the DEIS is the SEPA scoping report, and it includes copies of all of the correspondence received during the scoping comment period, which was open from November 3, 2005, until December 23, 2005. All other correspondence – including all testimony at the DEIS public hearing on February 15, 2007, and several letters submitted by the Coca-Cola Bottling Company of Washington – has been provided to the project steering committee.

Comments

play a major support role for our operations. Our supply chain includes in-state businesses upon which we rely upon for the materials needed to get our products "out the door". Other regional businesses also support our sales and marketing efforts. CCBCW has a significant economic impact on the area in that we are job creators and provide meaningful, stable work in the broader manufacturing/business sectors in Bellevue as well as the greater Puget Sound.

The CCBCW Bellevue production facility within the Bel-Red corridor is of critical importance to the local bottling company. The facility is strategically located near SR 520 and the 405 in the middle of a key distribution district for the greater Puget Sound area. The facility is over 180,000 sf in size and employs approximately 438 people with a payroll of over \$18 Million. CCBCW recently made a significant capital investment of approximately \$17 Million to accommodate the Dasani water bottling enterprise, resulting in a 78,000 square foot expanded warehouse and 7,000 square foot fleet building.

CCBCW is committed to stay and grow at this location; therefore, it is critical that the area be zoned appropriately. The cost of a move would be prohibitive; moreover, there are simply no similar sites available, suitably zoned and located that can serve this purpose and need.

Conclusion: CCBCW Can Be Part of a Vibrant Future for this Evolving Area.

We realize that the City's vision for this area may be changing and evolving; however, CCBCW is a clean, light industrial use that can be a vibrant part of the future vision of this area. The fact that Wright Runstad is willing to invest in the Safeway site shows that we can be a compatible neighbor and not a detriment to change. Moreover, as a local company, CCBCW participates in youth development/education partnerships, neighborhood revitalization programs, environmental/recycling initiatives, and local charitable causes and sponsorships. CCBCW is committed to being a responsible corporate citizen and part of the future vision for this area.

The Coca-Cola Bottling Company of Washington is committed to continued growth in all of its local business operations. It has made a positive difference in the community, and we hope the Steering Committee will agree that CCBCW should be a welcomed part of any future vision for the area.

Very truly yours,



Robert B. Slack Jr.
Washington Market Unit, V.P.



Darin Croston
Plant Manager, Bellevue

Enclosure

Responses

Coca-Cola Bottling-7a

The City acknowledges that Coca Cola Bottling Company of Washington has made a significant investment in its facilities within the Bel-Red Corridor. The DEIS analysis forecasted employment on pages 8-5 to 8-7 of the DEIS is a broad analysis that looks at general forecast trends by major industry sector. The reference to forecasts that the manufacturing sector will likely lose jobs is not meant to imply that *all* industrial uses are declining and moving out of Bellevue.

Comments

Responses

cc (w/Encl.): Steering Committee Members
Matthew Terry, City of Bellevue
Kevin O'Neal, City of Bellevue
Kevin McDonald, City of Bellevue

#348440 17744-007 7g%w011.doc 3/9/2007

Comments

March 9, 2007

TG: 07022.00

Matthew J. Fanoce
 Corporate Director of Real Estate & Facilities
 Coca-Cola Enterprises Inc.
 2500 Windy Ridge Parkway,
 Atlanta, Georgia 30339

c/o Brian Eftink
 Miller & Martin
 Suite 1000 Volunteer Bldg.
 832 Georgia Avenue
 Chattanooga, TN 37402-2289

**SUBJECT: BEL-RED CORRIDOR PROJECT;
 DEIS TRANSPORTATION REVIEW COMMENTS ON BEHALF OF
 LOCAL COCA COLA BOTTLING COMPANY OF WASHINGTON**

Dear Mr. Fanoce:

Per your request, we have completed a review of the transportation element of the subject DEIS, dated January 25, 2007. Our focus is transportation issues, and the underlying assumptions made to support the analysis of future conditions. The intent of our review was not to find fault in the document, but to help ensure that the public debate over the future of the Bel Red Corridor is shaped by accurate assessments of future transportation conditions. It is further framed by the recognition that the Coca-Cola Bottling Company of Washington (CCBW) has recently made substantial investments on the site and thus intends to stay for the long term. With that, CCBW want to assure that ongoing operations are not unduly compromised by other aspects of achieving the City's ultimate goals for the Bel-Red Corridor. Further, their ability to make appropriate investment in future expansion of operations should not be precluded or complicated by failure of the City to recognize the operation as a designated use under any adopted land use plan.

We offer the following comments for your consideration, as well as that of the City of Bellevue:

1. **Cumulative Growth.** We understand that the underlying growth assumptions used as the basis for 2030 traffic forecasts do not include consideration of ongoing efforts by the City of Redmond to update the growth and vision for the Overlake subarea. Based on the substantial levels of growth being contemplated both in Bel-Red and Overlake, it is imperative that a cumulative analysis be completed which considers traffic demand from a blended, worst-case growth forecast. *To assure that worst case growth conditions are addressed, we recommend that cumulative analysis be undertaken which considers the impact of growth in the Redmond Overlake subarea. We further*

The Transpo Group Inc. 11730 116th Avenue N.E., Suite 600 Kirkland, WA 98034-7120 425/821-3665 Fax: 425/825-8434

Responses

Coca-Cola Real Estate-1

For the purposes of the Bel-Red Corridor Project EIS, the analysis concentrated on evaluating proposed land use changes in the Bel-Red Corridor. The transportation modeling was intended to determine transportation system impacts based on action within Bel-Red. Land use forecasts outside of Bel-Red were consistent with adopted PSRC forecasts. The transportation modeling is done for comparative purposes between each of the alternatives analyzed in the DEIS and between the No-Action Alternative and the Preliminary Preferred Alternative in the FEIS. At present, Redmond has not yet adopted Comprehensive Plan or Development Code amendments that would authorize or encourage a higher level of development in Overlake, although this is being considered in their planning process. There will be a subsequent process to analyze the cumulative transportation system impacts of both Bellevue's and Redmond's land use vision, and the results of that analysis will be used to inform decisions on land use zoning and phasing, and transportation system improvements, and potential cost sharing between the two cities.

Comments

Responses

Mathew Fanoie
 March 9, 2007
 Page 2



recommend that neither city adopt a land use and/or infrastructure plan until combined growth in the two subareas is understood, and jointly reconciled.

- 2. **Infrastructure Assumptions - Regional.** The improvements to regional infrastructure such as SR 520 and I-405 that are assumed for all alternatives. Assuming the same background infrastructure for all alternatives provides a reasonable basis of comparison between the land use options considered for the Bel-Red Corridor. However, to the extent that some or all of these improvements may not be constructed due to funding, or community desires, actual traffic conditions may be substantially worse than reflected in the DEIS for all alternatives. Failure to disclose the nature of traffic conditions that could occur without these projects may risk reflecting less than a reasonable worst case condition. *We recommend that sensitivity analysis be conducted to provide decision-makers with a basis for understanding the implications of regional infrastructure projects on traffic operations in the Bel-Red Corridor, especially at locations anticipated to provide access to the regional system.*
- 3. **Infrastructure Assumptions - Local.** Accessibility to the regional system is critical to the operations of CCBW. Primary regional access occurs via the SR 520/124th Avenue interchange. We note that the analysis indicates that LOS will decline from LOS D existing, with 41 seconds of average delay per vehicle, to LOS E (68 seconds of delay) under the most intense land use, Alternative 3. While this represents the overall level of service and intersection delay, it is not clear how the delay for northbound approach vehicles would be impacted by these changes, especially considering the added east- and westbound approaches is identified in Appendix G for Alternatives 2 and 3. *We recommend that additional disclosure of transportation analysis be provided that includes the resulting performance by intersection approach be provided in an expanded appendix to provide a basis for assuring that north and southbound traffic performance through this intersection is maintained at a level consistent with the overall intersection performance.*
- 4. **Clarification Needed.** There are a few instances where the assigned traffic volumes for the alternatives do not clearly track with the intensity of the alternative. For example, Alternative 3 is clearly the most intense land use alternative, and I would expect to generate the highest traffic volumes. However, the volumes on the southern half of 124th Avenue, as well as the volumes east and west of 124th on Bel-Red Road, are noticeably if not significantly less than Alternative 2. On the other hand, Table 10-6 does indicate a worse Level of Service for Alternative 3 than Alternative 2 at the intersection of Bel-Red Rd./124th. *We request that this be clarified to provide CCBW with confidence that the analysis of traffic conditions adjacent to their site and affecting their site traffic operations is accurately reflected in the document.*
- 5. **Light Rail Transit.** There is substantial detail offered with respect to LRT ridership, and local boarding by alternative. It is not clear what proportion of Bel-Red Corridor residential and employment mode split would be accommodated by LRT in these scenarios, and how these mode splits would compare with other regional data and assumptions. Further, the nature of the LRT crossing of 124th Avenue NE is not clear. To the extent that it is grade separated, this would not impact CCBW access operations. *If an at-grade crossing is contemplated, how would this affect traffic operations on 124th Avenue NE, especially as it relates to CCBW regional accessibility to the north? If an LRT station is located near 124th Avenue NE, how will King County Metro*

Coca-Cola Real Estate-2

See response to WSDOT-4.

Coca-Cola Real Estate-3

This is a programmatic EIS for a 20+-year land use and transportation vision. The intersection analysis provided in the DEIS is arguably more specific than typically provided at this level of analysis. The requested information is readily available; however, the pertinence of such detailed information for an analysis 20+ years into the future is speculative. This type of information can, and will, certainly be monitored as specific developments are tested through concurrency and project-specific SEPA review at the City. This short-range process is the more appropriate time to question specific movements operations.

Coca-Cola Real Estate-4

For both Alternatives 1 and 3, the 124th Avenue NE corridor is served by an LRT station, but for Alternative 2, this area is on the edge of both light-rail transit (LRT) station nodes. As noted in Table 10-13, a.m. peak hour alightings for the 122nd Avenue NE LRT station exceed 400, which potentially become boardings in the p.m. peak hour. The difference in traffic volumes on 124th Avenue between Alternative 2 as compared to Alternatives 1 and 3 could be explained solely by the potential mode shift in this area from vehicle to LRT. Likely, however, there are other factors that contribute to the volume differences, including different network assumptions on NE 12th, NE 10th, and the intersection of 124th Avenue with Bel-Red Road. The level of service (LOS) degradation at the intersection of 124th Avenue NE and Bel-Red Road is mostly attributable to the increased traffic volumes on the NE 10th Street extension in Alternative 3 because it is assumed to be a four-lane roadway in this alternative.

Comments

Responses

Coca-Cola Real Estate-5

See response to Coca-Cola Real Estate-4.

Mathew Fanoie
March 9, 2007
Page 3



provide connecting bus service and where would transit stops for such service be provided. We recognize that some of this information may yet to be determined, but feel it appropriate to at least qualitatively acknowledge in this document the potential for these impacts to occur, the nature of the potential impact, and the importance of addressing these issues in the Sound Transit EIS that is underway.

Thank you for the opportunity to assist you in providing feedback to the City of Bellevue on this document. The City is exploring important land use decisions about growth, and how to accommodate it in a manner that minimizes impacts and creates an exciting sense of place. With that, it is also important for the City to acknowledge long-standing major corporate stakeholders who not only have deep community historical roots, but also are committed to maintain a future in the community. I trust our comments will be helpful in assisting the City in achieving their vision while also maintaining a focus on the critical business interests of CCBW.

Sincerely,
The Transpo Group, Inc.

A handwritten signature in black ink, appearing to read "Kurt G. Gahnberg".

Kurt G. Gahnberg
Principal

cc Ryan Durkan; Hillis Clark Martin & Peterson
Brian Eftnik, Miller and Martin

Comments

Responses

Page 1 of 1

Helland, Carol

From: Bruce Nurse [Bruce@kemperdc.com]
Sent: Monday, March 12, 2007 3:21 PM
To: Helland, Carol
Subject: Bel-Red Corridor DEIS Comment Letter
Attachments: Bruce@kemperdc.com.vcf; Bel-Red Corridor DEIS KDC Comments ltr FINAL 3-12-2007.DOC

Carol –

Attached to this email is a letter making comments and raising questions about the Bel-Red Corridor Draft Environmental Impact Statement released by the City of Bellevue January 25, 2005. I am mailing a hard copy to you and delivering a hard copy to City Hall today, Monday, March 12, 2007.

I will await the answers to the questions and concerns until the Final Environmental Impact Statement is complete.

Sincerely,



Bruce L. Nurse, Vice President, Transportation
Kemper Development Company
575 Bellevue Square
Bellevue, WA. 98004

office direct 425 460 5790
cell phone 206 799 5616
fax 425 460 5791

3/13/2007

Comments

March 12, 2007

Sent via email 3/12/07
Hard Copy mailed via U.S. Mail 3/12/07

Ms. Carol Helland
 City of Bellevue Environmental Coordinator
 P.O. Box 90012
 Bellevue, WA 98009-9012

Ref: Bel/Red Corridor Draft EIS

Dear Ms. Helland:

We believe it is appropriate for the City to consider long-term development alternatives for the Bel/Red corridor. Our comments are based on review of the DEIS document, attendance at the Feb. 1 briefing for the Steering Committee and the briefing document that was presented at that meeting.

We have ongoing interest that Bellevue's transportation networks will perform for the entire City including the Bel/Red Corridor, Overlake and Downtown. In particular we are in favor of adequate and timely transportation improvements being made commensurate with traffic growth and land use development in the City. Further, we are concerned that no area of the City fails the transportation concurrency tests with the potential to shut down development in all areas. It is for these reasons that our comments and questions focus on transportation, under the following headings:

- Land Use Alternatives
- Analysis of Alternatives
- Transit
- Roadway Improvements
- Evaluation of Transportation

Page 1 of 4

Responses**Kemper Development-1**

See response to WSDOT- 4 and Diane Daryl- 1. The Bel-Red Corridor Project DEIS analyzed the transportation system impacts from a range of potential land use scenarios that include background growth assumptions from the rest of the city and the region. The analysis provides information upon which Citywide project and funding decisions can be made – within a separate public process that is outside the scope of the Bel-Red Corridor Project.

Comments

Responses

LAND USE ALTERNATIVES

- 2 1. At the Feb. 1 briefing, there was acknowledgment that Redmond's additional development for their Overlake Village was not included in the estimate of future traffic. It appears that Redmond's aggressive option for Overlake Village could add another 15,000 employees more than BROTS II. That would be more than the projected employment increase for the Bel/Red corridor and would certainly have significant impact on the area's transportation system. We request that the FEIS will address these impacts in detail.
- 3 2. Why did the DEIS document not indicate the geographic distribution of new Corridor development in each of the alternatives? That work must have been done in order to run the BKR model.
- 4 3. The 4th page of briefing document distributed at the Feb. 1 meeting said that the EIS evaluated the Crossroads and Wilburton/NE 8th Sub area plans. Where is this analysis in the DEIS document?
- 5 4. In the analysis of 2030 conditions, what level of new development was assumed for the remainder of Bellevue, including Downtown specifically?
- 6 5. Was the full level of Microsoft's planned development included?
- 7 6. What is the existing level of office, retail, industrial and residential development in the Bel/Red corridor? This information would be valuable in judging the scale of changes proposed in the alternatives.
- 8 7. The document refers to "higher density", but without any identification of where, how much, nor the resulting impact.

ANALYSIS of ALTERNATIVES

- 9 1. Why were funded and unfunded transportation projects included for the Action alternatives in 2030, but only funded projects for No Action? Does this have the effect of clouding the comparison of the Action Alternatives with No Action?
- 10 2. With LRT included in all 4 alternatives, including No Action, it is not possible to judge conditions if LRT does not happen. LRT is not a given; Sound Transit must receive voter approval to proceed with the East Link Line. What would be the effect of having bus service, but no LRT for the Corridor?
- 11 3. Will the FEIS evaluate one or more hybrid alternatives? If so, the effect of not having LRT should be evaluated.
- 12 4. On page 10-28, the second sentence of the next-to-last paragraph says, "Average intersection delays [for the No Action alternative] would worsen significantly over existing conditions." How can this statement be justified, given the major difference in methodology for existing and 2030 delay estimates, as described on page 10-3?

Kemper Development-2

See response to Coca-Cola Real Estate-1.

Kemper Development-3

Each alternative analyzed in the DEIS showed the land use distribution and relative land use intensity in Figures 2-3, 2-4, and 2-5, plus the accompanying text in Chapter 2. For purposes of transportation modeling, staff and consultants allocated specific amounts of potential new development (office, housing, and retail) to the several Transportation Analysis Zones (TAZs) within the Bel-Red Corridor. Simultaneously, displaced uses, such as light industrial uses, were reduced by specific amounts, depending in part on the amount of redevelopment anticipated by 2030. A similar exercise was conducted for the Preliminary Preferred Alternative analysis in this FEIS. A table and figure showing the land use allocations and changes by TAZ is included as Attachment 1 in Appendix A.

Kemper Development-4

The Bel-Red Corridor Study Area is composed of all of the existing *Bel-Red/Northrup Subarea Plan* along with a small portion of the existing *Crossroads Subarea Plan* (the area that includes Angelo's, Uwajimaya, etc.) and a small portion of the existing *Wilburton/NE 8th Subarea Plan* (area that includes Whole Foods, Design Center, and a strip south of Bel-Red Road). See Figure 7-2 in the DEIS.

Kemper Development-5

The City of Bellevue used the most up-to-date Puget Sound Regional Council (PSRC) forecasts for the year 2030 (2003 Small Area Forecasts) when it began the transportation modeling for the DEIS. Growth in the Bel-Red Corridor under the three action alternatives was assumed to be above

Comments

Responses

TRANSIT

- 13 1. The document focuses on AM transit ridership. Why not PM as with the roadway analysis?
- 14 2. Descriptions of the AM transit figures are confusing and contradictory. Text on page 10-31 says transit ridership figures for Table 10-3 were for a 3 hour AM peak period. However, the table's title refers to peak hour. On page 1-05, AM 1-hour is shown at the top of the page and AM 3-hour at the bottom. Which is correct? Did that discrepancy result in errors in the resulting analysis? Are the figures on Table 10-13 (p. 10-38) for 1 hour or 3 hours?
- 15 3. What assumptions about mode split for transit were incorporated in the model (costs, trip times, transfer penalties, maximum and/or mean walking distance, parking restrictions or fees for example)?
- 16 4. Transit boardings are summarized on page 10-38 for Bel/Red, Overlake and downtown Bellevue. What are the model's results for peak hour link volumes on the LRT in downtown Bellevue and in the Bel/Red corridor?
- 17 5. On page 10-5, one of the assumptions for the East Link project is that it "... assumed to extend from Northgate-to-Downtown Seattle to Bellevue-to-Redmond." Sound Transit has said that if the City of Bellevue insists on an underground alignment, the line can extend only as far as Overlake. If the model assumed LRT service to Redmond, what would be the effect on ridership results if it terminates at Overlake?

ROADWAY IMPROVEMENTS

- 18 1. The transportation speaker at the Feb 1 briefing cautioned that all of the traffic improvements would be needed to achieve the results of the DEIS document. Will the FEIS provide an estimate of costs of traffic improvements for all alternatives including hybrid(s)?
- 19 2. Intersection level-of-service (LOS) estimates for existing conditions were based on traffic average over a PM peak two-hour period, as is done in the City's concurrency calculations. For the 2030 alternatives, LOS was estimated for the PM peak hour. This makes it impossible to compare future with existing conditions. What are the existing condition results for the PM peak hour?
- 20 3. Sketches of the Alt. 1, 2, and 3 alternatives at Bel-Red/12th NE described on page 10-30 should be provided. The scale of Figures 10-6, 7, 8 is too small to allow visualization of the concepts.
- 21 4. Has there been any prior study of the extension of NE 10th to 124th Ave NE proposed on page 10-17 of DEIS? A sketch showing the alignment and property impacts should be provided.
- 22 5. What improvements to the I-405/SR-520 interchange were assumed for 2030?

and beyond the City's 2030 forecast numbers (and not a redistribution of 2030 growth). The forecast for Downtown Bellevue for the No-Action Alternative and the three action alternatives in the DEIS remained constant at a total of 79,000 jobs and 13,500 residents in downtown in 2030.

Kemper Development-6

The DEIS assumed all of the planned development that was approved as part of the Microsoft Development Agreement with the City of Redmond was in place by 2030. Additional land use in Redmond was assumed in the DEIS, based on forecasts adopted by PSRC in 2003. As noted in Coca-Cola Real Estate-1, subsequent work on updating the Bel-Red/Overlake Transportation Study (BROTS) agreement will update land use forecasts in both cities.

Kemper Development-7

The "existing" development in the Bel-Red Corridor as of 2005 is as follows (see page 7-2 of the DEIS): 3.2 million square feet office, 2.3 million square feet retail, 4.1 million square feet industrial, 100,000 square feet recreation, 157,000 square feet institutional, and 193,000 square feet residential.

Kemper Development-8

Comment acknowledged. The term "higher density" was intended to refer to higher development intensities in some parts of the corridor relative to others. A glossary of terms was prepared at the time the steering committee approved the action alternatives to be evaluated in the DEIS, and the highest intensity contemplated in the corridor was a floor area ratio of approximately 2.0, and buildings of approximately six stories; this is what is meant as higher density. As discussed in Legacy-1, building heights could be higher than six stories in portions of the corridor, based on analysis contained in Appendix C of this FEIS. Height limits are expected to be

Comments**EVALUATION OF TRANSPORTATION**

- 23 1. The DEIS document did not provide trip generation by mode of travel for the four alternatives. This is a highly unusual omission. What was the reason for this? The only trip generation information was for transit. The only indirect recognition of other modes was in a mere 7 lines of text at the top of page 10-24.
- 24 2. In the briefing materials used in the Feb. 1 meeting, there is a "Transportation: Mode Share" chart. What is meant by the category "Transit Walk"? It could mean access to transit by walking, but page 10-24 of the DEIS says these are transit and pedestrian trips. What portion were pedestrian trips? How specifically were pedestrian trips quantified for the Alternatives? Does "Transit P&R" on the chart refer to the portion accessing transit through park-and-ride lots?
- 25 3. Is the "Transportation: Mode Chart" from the briefing materials for the PM peak hour? How were the AM transit trips estimated by the model, as described in the DEIS document, converted to daily or PM peak hour trips?
- 26 4. In addition to pedestrian trips, were other non-motorized trips quantified? If so, how and what were the results?
- 27 5. In the Feb. 1 briefing materials, there is a chart labeled "Transportation: Modeling. It says "Model assigns multimodal trips to each land use" Does that mean the analysis started with assumed transit ridership and allocated those to land uses, or was the process more like the traditional one shown at the bottom of that page? The same page also says, "Integration of land uses helps reduce vehicle trips." Was that potential effect quantified, and, if so, what were the results?

We appreciate the opportunity to comment.

Respectfully Submitted,



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Responses

addressed as part of the committee's final recommendation, and will be further evaluated by the Planning Commission and City Council.

Kemper Development-9

See response to WSDOT-4. To clarify, the difference between unfunded and funded project assumptions in the No-Action Alternative, versus the action alternatives, only pertains to the immediate Bel-Red Corridor Subarea. The same project assumptions, whether funded or unfunded, were assumed outside of the Bel-Red Corridor Subarea. The reason unfunded projects were not included in the No-Action Alternative is because there was no new growth, other than that already planned by the City. In this way, the DEIS was able to document capacity constraints on the system even with no change in land uses or intensities in the area.

Kemper Development-10

The City acknowledges that light-rail transit (LRT) is not a given during the time horizon of this planning effort, but LRT service to and through the corridor is consistent with Sound Transit's long-term plans. If LRT is not approved, the phasing of land use intensity could be adjusted, the roadway capacity increased, and/or additional rubber-tire high-capacity transit service could be explored.

Kemper Development-11

The Preliminary Preferred Alternative analyzed in the FEIS is essentially a hybrid of the most desirable components of the four alternatives analyzed in the DEIS. Since the analysis is for the 2030 horizon year, a light rail system is assumed in the transportation system modeling.

Comments**Responses****Kemper Development-12**

Comment acknowledged. The referenced sentence should be stricken—the change will be noted in the FEIS errata sheet. It is logical to presume that even given different methodologies, intersections operation will likely degrade over a 20+-year timeframe, given limited improvements and planned growth both inside and outside the City.

Kemper Development-13

The weekday a.m. period is traditionally used for transit projections because that is when individual mode choice travel decisions (especially for commuting) are made. The afternoon/evening period is more complex and less documented.

Kemper Development-14

All references to 3-hour peak periods should really be a peak hour reference. None of the data presented in the DEIS summarize 3 hours of transit data. Changes will be noted in the FEIS errata sheet.

Kemper Development-15

The BKR model, like most mode choice models, compares the cost or “disutility” of travel by each mode. In the BKR model, the available vehicular modes include single-occupant vehicles (SOVs); high-occupancy vehicles (HOVs, or carpools); and transit. The components of disutility for these modes are of two types: out-of-pocket dollar costs and travel time. Out-of-pocket costs are measured in constant dollars of a specific base year for the purpose of model calibration. Travel times are estimated from the travel network.

The disutility measures for each mode in the BKR model are as follows:

Comments**Responses**

SOV

- travel time (peak hour)
- parking cost (obtained from surveys)
- terminal time (walking time between parking and actual origin or destination)
- out-of-pocket variable costs such as fuel
- Parking costs and terminal times vary by zone of origin or destination, and are generally highest in densely developed zones such as central business districts.
- HOV
- HOV disutility is similar to that of SOVs, but it is assumed that vehicle parking and out-of-pocket costs are divided among the occupants. Furthermore, the parking costs faced by carpools may be lower than SOVs as a result of carpool subsidies and incentives.
- Transit

In the BKR model, there are several components to a transit trip, including transit fare; access time (time spent walking or driving to the transit stop or park and ride); time spent waiting for the transit service; in-vehicle ride time; and time spent waiting for a transfer. Each of the transit travel time components is weighted differently in relation to an hour of SOV travel time. For example, the disutility of an hour spent waiting for transit is considered to be 2.8 times that of an hour traveling by SOV. Some of the transit travel time weights are as follows:

- In-vehicle time weight: 1.0
- Waiting time weight: 2.8
- Access (walk or drive) time weight: 2.1
- Boarding time weight: 2.0

Comments**Responses**

- For transit travel, the above components are estimated separately for each zone-to-zone movement, based on transit service coverage, the transit line speeds and headways, number of transfers, and so on.
- The calculation of mode shares for SOV, HOV, and transit in the BKR model are based not only on observable cost and travel time components as described above, but also on qualitative differences between the modes. For example, when bus and SOV modes offer equal costs and travel times for a given trip, it has been observed that the result is not necessarily an equal division of trips between the two. This is attributed to qualitative aspects of the two modes of travel, such as comfort and ability to use the time for other activities. For each mode, a special variable known as the “modal constant” is estimated from travel survey data to capture these qualitative characteristics.

The parameters of the BKR model were taken from the mode choice model of the PSRC, which was calibrated from actual travel behavior as reported in household travel surveys. For more information on mode split assumptions, see City of Redmond-6.

Kemper Development-16

A.m. peak hour link volumes on the LRT in the Bel-Red Corridor (between 116th Avenue NE and 148th Avenue NE) are as follows:

No-Action: 1,379 westbound, 939 eastbound; Alternative 1: between 1,546 and 1,748 westbound and 1,215 and 1,410 eastbound; Alternative 2: between 1,520 and 1,718 westbound and 1,070 and 1,172 eastbound; Alternative 3: between 1,633 and 1,764 westbound and 1,169 and 1,501 eastbound.

Comments**Responses**

Link volumes were not documented in the DEIS because they do not provide an indication of the total number of people served, particularly when there are multiple transit stops along the corridor. For example, if there are 1,000 people on a train entering an LRT station, and 200 people get off, and 200 people get on, there are still 1,000 people on that train after it leaves the station; however, 1,200 people were served. As a result, it was decided to report boardings and alightings as opposed to link ridership.

Kemper Development-17

All model runs for the Bel-Red Corridor Project DEIS did assume the LRT would extend to downtown Redmond, which was based on the most definitive information at the time of publication. The City's understanding of the consequences of a different LRT system than was assumed for the analysis in the DEIS are described in the response to Kemper Development-10.

Kemper Development-18

At this early stage in the planning process, the costs of potential infrastructure improvements have not been accurately quantified. The City will prepare planning-level cost estimates as projects are further developed, and these estimates will be made available for public review. The State Environmental Policy Act (SEPA) does not require a cost-benefit analysis of agency proposals and recommends that alternatives not be evaluated on a cost-benefit basis when there are important qualitative considerations (WAC 197-11-450).

Comments**Responses****Kemper Development-19**

As was pointed out in response to Kemper Development-12, the DEIS states clearly on page 10-3 that a comparison between existing and future conditions should not be made because of the differing methodologies. A 1-hour existing conditions analysis is not readily available. However, the ability to compare between 2030 alternatives is most important, and can be made.

Kemper Development-20

Specific alignments for potential new roadways have not been developed. Further preliminary engineering work will be accomplished in accordance with the selected preferred alternative.

Kemper Development-21

Specific alignments for potential new roadways have not been developed. Further preliminary engineering work will be accomplished in accordance with the selected preferred alternative.

Kemper Development-22

WSDOT's master plan was assumed for the I-405/SR 520 interchange. In general, that plan includes direct access HOV ramps in all directions except westbound to northbound and southbound to eastbound, flyover SOV connection from westbound to southbound, and a two-lane northbound to eastbound ramp.

Kemper Development-23

Specific trip generation values, based on the *ITE Trip Generation Manual* for example, were not calculated for each alternative. Trips were determined by the BKR model after assigning new land uses for each alternative. To estimate the net number of new p.m. peak hour vehicular trips generated by the change in land use for Alternatives 1, 2, and 3, the total

Comments**Responses**

number of trips in the BKR model for each action alternative were subtracted from the total number of trips for the No-Action Alternative, and the result is 3,090, 3,614, and 4,196, respectively, vehicles per hour. These numbers do not include transit trips, which are reported separately in the DEIS, or non-motorized trips, which are not available.

Kemper Development-24

Transit/Walk refers to transit trips accessed by walking to the transit facility, as opposed to Transit/P&R, which are transit trips accessed from a park-and-ride lot. The forecasting model does not have the ability to generate pedestrian and/or bicycle forecasts, so there are not separate forecasts for those modes.

Kemper Development-25

The mode split information contained in the DEIS and presented at the February 1, 2007, Steering Committee meeting are daily values for the Bel-Red Corridor only. The a.m. peak hour transit trips were obtained directly from the BKR forecasting model, as opposed to being converted from daily or p.m. peak hour trips.

Kemper Development-26

See response to Kemper Development-24. Nonmotorized trips were not quantified in the DEIS.

Kemper Development-27

The forecasting analysis did not start with assumed transit ridership, followed by allocation of that ridership to each land use. Rather, the forecasting process followed the sequence outlined in the graphic on the bottom of the slide presented at the February 1, 2007, Steering Committee meeting. The graphic, however, does contain an error, in that the model is

Comments**Responses**

not capable of allocating pedestrian trips. The pedestrian trips shown on this graphic relate only to those associated with transit trips that do not originate from a park-and-ride lot. The potential effect of land use integration, i.e., trips originating and ending within the Bel-Red Corridor, was not formally quantified for the three action alternatives documented in the DEIS; however, early analysis of an alternative most similar to Alternative 3 indicated between 10 and 15 percent of the trips generated by the new land uses would remain internal to the study area. This finding was obtained directly from the BKR model.

Comments

VIA e mail 3-13

To: Carol Helland
 From: Bridle Trails Community Club
 Re: Bel-Red Corridor Project/Draft EIS
 Date: 12 March 2007

Dear Ms. Helland,

The Proposed Bel-Red Corridor Project will have a detrimental impact upon the Bridle Trails Area. Our area is bordered by SR520, I 405 and 148th. As a result, our community is subject to the constant pressure of increased traffic and noise. In addition, our area is subject to pressure due to the rapid growth and development of Redmond. The position of the Bridle Trails Community Club (BTCC) is that even under the No Action alternative, our community has concerns about development and growth that must be addressed and resolved.

For the purposes of commenting upon the Bel-Red Corridor Project, and without withdrawing our current concerns, the Bridle Trails Community Club (BTCC) recommends that the City adopt the No Action alternative as set forth in the Draft EIS for the Bel-Red Corridor Project. In addition, comments of the BTCC are set forth below:

1. Pursuant to the Growth Management Act, Bellevue's Comprehensive Plan provides the legal, policy, and practical framework upon which the City and its citizens have relied to guide the City's growth. The Bel-Red Corridor Project proposes major changes in land use, transportation, and public service infrastructure. These changes will not only have an impact upon the Bel-Red area and the neighboring sub-areas but also have an impact upon the entire framework of the Bellevue Comprehensive Plan. The Draft EIS does not address how the proposed alternatives will be integrated into the Comprehensive Plan.
2. This EIS is a programmatic EIS and as a result, there are no references to specific projects. There are circumstances in which a programmatic EIS is appropriate. In this case in which the City is proposing major changes for a large area, such an approach in effect is a denial of sufficient notice to the land owners and to the citizens. The proposed changes to the land use will have major economic consequences to the landowners and to residents of neighboring areas. The lack of notice of the specific types of changes that will occur prevents land owners in the Bel-Red area from knowing exactly how their land uses and livelihoods will be impacted.
3. The City chose to use the expanded scoping process pursuant to WAC 197-11-410. The purpose of the expanded scoping process is to promote interagency cooperation, public participation, and innovative ways to streamline the SEPA process. Under the expanded scoping process there are no specified procedural requirements for methods, techniques or documents that must be used. The use of the expanded scoping process may be appropriate in some cases. It is not the appropriate process in this case in which the City proposes major land use changes in the largest light industrial zone in Bellevue.
3. The Bel-Red light industrial area is an area of economic diversity. There are many small and medium sized business which provide important services and goods. The City's proposal to change the zoning to residential and office use will destroy this pocket of economic diversity. The Draft EIS does not present sufficient evidence to support the destruction of businesses and jobs.

Responses

Bridle Trails Community Club-1

The proposed action that the DEIS covers includes potential amendments to the City's *Comprehensive Plan*, subarea plans, and Land Use Code. This is stated on the Fact Sheet and Chapter 1 of the DEIS. The *Comprehensive Plan*, and applicable Subarea Plans, will have to be amended based on the direction from the project Steering Committee, and subsequently based on review and consideration by the Planning Commission and City Council.

Bridle Trails Community Club-2

The City of Bellevue has provided broad public notice on the planning effort for Bel-Red from the beginning of the project, including mailings to all property owners and surrounding neighborhoods at the beginning of the project during the State Environmental Policy Act (SEPA) scoping process. Refer to Appendix B for a chronology of public involvement. Any subsequent changes to the *Comprehensive Plan*, subarea plans, and Land Use Code will take place during regularly scheduled, and advertised, meetings with the Planning Commission and City Council.

Bridle Trails Community Club-3

An expanded SEPA scoping process was selected for the Bel-Red Corridor Project because of the expected high level of public interest in the project. The DEIS documents the affirmative actions the City took to expand the scope, including:

- Lengthening the time period allowed for submission of scoping comments
- Using meetings and/or workshops to provide information and invite feedback on the project and the EIS scope
- Distributing questionnaires and information packets about the project

Comments

Responses

- 5 4. The traffic at the intersections near the Bridle Trails area, in particular at Northup and 130th are either near at Level F. The Draft EIS does not adequately address the issues of increased density and the results upon the intersections adjacent to the Bridle Trails area.
- 6 5. The Draft EIS does not present sufficient evidence for the need for higher density housing in the Bel-Red area.

In the event that the City decides to adopt an alternative other than the No Action alternative the BTCC recommends the following:

- 7 **Minimize all impacts on the surrounding neighborhoods including Bridle Trails Subarea to the north.** Identify specific mitigation to maintain and improve the livability factor of the surrounding neighborhoods. Ensure that development is in compliance with surrounding neighborhood Subareas and the Bridle Trails Subarea Comprehensive Plan.
- 8 **LI Zone and Services Core:** Create an area to keep the existing service and other current industries so they may continue to exist and not be displaced due to long-term economics. Provide an inventory list of all existing services and businesses that may be retained in the preferred alternative.
- 9 **Development Density along NE 20th Street/Northup Way:** Maintain the current development use density along this corridor as a buffer to Bridle Trails, especially the area surrounding NE 20th and 130th Ave. NE.
- 10 **SR 520 Connection at 124th Ave. NE.** Meet noise, view and spill-over transportation protection requirements for Bridle Trails Subarea.
- 11 **Housing:** Assess the **actual need for additional housing based** on the Growth Management Act projections. Arbitrarily assigning the number of units to be allowed may not be supported by market conditions.
- 12 **Transportation:** Identify specific projects that will mitigate the spillover traffic on Bridle Trails Arterial Streets: NE 24th w of 140th; 130th no of 24th; 140th no of 24th; 116th no of Northup and NE 40th w of 148th. Analyze and include mitigation for all non-signalized intersections in surrounding neighborhoods including NE 24th at 126th, 130th and 134th; and 140th at NE40th. This is needed to determine mitigation to minimize the length of time it takes to enter and exit our neighborhoods. Include traffic modeling volumes on the above streets and methodology used. Identify additional potential new transportation infrastructure needed to mitigate impacts on surrounding neighborhoods especially spillover traffic.
- 13 **Impact of Utility Needs:** Assess the impact on surrounding neighborhoods for additional substations, switching stations, transmission lines and other pertinent facilities.
- 14 **Redmond Expansion:** Include in the Final EIS the above considerations involving the Redmond Ambitious Plan for the Overlake area.

Loretta Lopez, Co President
Ellen Kerr, Co President

- Consulting with other agencies while the EIS is being prepared, rather than waiting for them to submit their comments on a completed document

The expanded scoping process is specifically intended to enhance opportunities for public involvement, as compared to the “standard” SEPA scoping process. It allows more time for interested parties to provide scoping comments, and generally includes more outreach and meetings than would otherwise occur. Therefore, it is especially appropriate for proposals regarding major land use changes. As noted in the comment, SEPA is not prescriptive about the requirements for expanded scoping; however, the City of Bellevue engaged in extensive outreach both during and after scoping that far exceeded the requirements of SEPA. Appendix B of this FEIS provides additional information on public involvement activities conducted for the Bel-Red Corridor Project.

Bridle Trails Community Club-4

Comment noted. As outlined in Bridle Trails Community Club-8, the project Steering Committee’s recommendation was very accommodating about existing light industrial and service uses. The Preliminary Preferred Alternative will accommodate most service and retail uses throughout the corridor.

Bridle Trails Community Club-5

None of the intersections near the Bridle Trails area are operating at level of service (LOS) F in 2030 under any of the alternatives (No-Action or action). The specific intersection referenced in the comment at Northup Way (NE 20th Street) and 130th Avenue NE operates at LOS D for the No-Action Alternative and Alternative 3, and in fact operates better under Alternative 3 given intersection improvements outlined in Appendix G of the DEIS. The impacts at this intersection have been disclosed in DEIS, including the necessary improvements

Comments**Responses**

under Alternative 3 to return the intersection to a pre-action condition.

Bridle Trails Community Club-6

The City Council's Bel-Red Corridor Planning Principle 8 and one of the Steering Committee's objectives provide direction to include an analysis of new housing opportunities in the Bel-Red Corridor. A market study conducted at the outset of the project indicated a strong demand for additional housing supply in this area where there is convenient access to employment opportunities. A central tenet of the Washington Growth Management Act supports providing housing within cities in proximity to jobs, retail, and services because it reduces growth pressures on rural areas, internalizes vehicle trips to the area, and is more efficiently served by public infrastructure including roads, transit, and utilities.

Bridle Trails Community Club-7

City Council's Bel-Red Planning Principle 8 and one of the Steering Committee's objectives provide direction to mitigate potential neighborhood impacts. To the extent possible in a programmatic analysis, the potential adverse impacts to adjacent neighborhoods are identified and possible mitigation is identified. Traffic analysis of the alternatives shows that there would be some increase in traffic, even with the No-Action Alternative. Traffic increases are identified on arterial streets that traverse through neighborhoods. On these streets, mitigation may include traffic calming measures – such as medians, landscaping, neighborhood entry signs, and sidewalks – that are intended to keep speeds within the designated limits, thereby making these streets less attractive alternatives to the freeways or major arterials. Specific mitigation for specific streets is not proposed with this analysis, but a menu of options is identified.

Comments**Responses****Bridle Trails Community Club-8**

The Bel-Red Steering Committee's Preliminary Preferred Alternative includes provisions for existing Light Industrial Uses and Service Uses. The vision for existing "traditional" light industrial uses, such as Coca Cola Bottling, throughout the corridor is that they be allowed to continue by current and future owners, be allowed to expand existing structures, and be allowed to reconstruct destroyed structures. However, no new traditional light industrial uses would be allowed in the corridor, and discontinued uses would not be allowed to reestablish.

The vision for Service Uses has three components based on exact use and geographic area:

- (1) All existing and future uses in the broad Service Uses sector would be allowed to occur throughout the corridor (e.g., health care, business and professional office, household repair);
- (2) For specific service uses with unique characteristics similar to traditional light industrial uses in transit nodes (1/4-mile radius from the LRT station) and standalone housing areas, existing uses would be allowed to continue by current and future owners, be allowed to expand existing structures, and be allowed to reconstruct destroyed structures. However, no new LI-type service uses would be allowed in these areas, and discontinued uses would not be allowed to reestablish;
- (3) For those specific service uses with light industrial characteristics in the remainder of the corridor (basically all the area outside of station nodes and separate from areas identified for standalone housing), existing uses would be allowed to continue by current and future owners, new service could to be established, and expansions and reconstruction of destroyed structures would be allowed.

Comments**Responses**

Following selection of a Final Preferred Alternative, City staff will develop the implementing regulations consistent with the Steering Committee's vision for review by the Planning Commission and City Council. Traditional light industrial uses and LI-type service uses in transit nodes and standalone housing areas will not be considered "nonconforming" uses. The exact term for an existing use that is allowed to continue and expand its structure, but new uses of its type are not allowed, is currently not part of Bellevue's Land Use Code. A new term will be developed that reflects this strategy for traditional light industrial uses and LI type service uses in the Bel-Red Corridor.

Bridle Trails Community Club-9

The Preliminary Preferred Alternative selected by the project Steering Committee for analysis in the FEIS anticipates no change in allowable density along the NE 20th Street corridor.

Bridle Trails Community Club-10

The Washington State Department of Transportation (WSDOT) will conduct a thorough environmental analysis of the proposed SR 520/124th Avenue NE interchange improvements at an appropriate time in the project design and development process.

Bridle Trails Community Club-11

See response to Bridle Trails Community Club-6.

Bridle Trails Community Club-12

The City Council's Bel-Red Corridor Planning Principle 8 and one of the Steering Committee's objectives provide direction to address potential impacts on neighborhoods. The City has an ongoing and proactive relationship with neighborhoods to address traffic issues specifically. Through the Neighborhood Traffic Control Program, neighborhoods can work with the

Comments**Responses**

City to address current or anticipated traffic problems. Potential traffic impacts from regional growth, combined with growth throughout Bellevue and specifically in the Bel-Red Corridor must be addressed in a comprehensive manner to ensure that measures enacted in one area do not divert traffic to other areas. The City has initiated a process to involve the neighborhoods surrounding the Bel-Red Corridor in discussions to address traffic impacts.

Bridle Trails Community Club-13

The DEIS did not identify any impacts to adjacent neighborhoods from any future utility needs in the Bel-Red Corridor.

Bridle Trails Community Club-14

See Coca-Cola Real Estate-1.

Comments

Responses



March 12, 2007

Carol Helland, Land Use Director
 Department of Planning and Community Development
 City of Bellevue
 P.O. Box 90012
 Bellevue, WA 98009-9012

Bel-Red Corridor Project DEIS

Dear Carol:

Thank you for providing Sound Transit the opportunity to comment on the Bel-Red Corridor Project Draft Environmental Impact Statement (DEIS). Sound Transit has worked closely with the City of Bellevue for over a year on the project and these comments are offered in that spirit of cooperation. These comments are in addition to oral comments made by Sound Transit at the public hearing on the DEIS held on February 15, 2007.

On January 11 of this year, the Sound Transit Board took a huge step towards bringing a light rail extension package to voters this fall. The Board adopted a Sound Transit 2 Draft Package that would expand light rail to the north, south and east to connect even more communities to the light rail system that is currently under construction. Under that package, light rail would extend north from the University of Washington to Lynnwood, south from Sea-Tac International Airport to the Port of Tacoma area and to downtown Tacoma if additional funding becomes available. The Sound Transit 2 (ST 2) Draft Package also includes the East Link project, which would extend light rail east across I-90 as far as Redmond's Overlake Transit Center, via downtown Bellevue and the Bel-Red Corridor. The Board also included funding for planning, preliminary engineering and property acquisition, emphasizing its commitment to extend light rail all the way to downtown Redmond if additional funding or cost savings can be secured.

Sound Transit is encouraged to see the City of Bellevue taking the necessary steps to leverage the potential of light rail transit in the Bel-Red Corridor in order to develop a denser, transit oriented, and more sustainable community. Coordination between the Bel-Red Corridor and East Link Projects, are those growth and land use/transportation actions envisioned by the Washington State Growth Management Act and Vision 2020: The Growth and Transportation Strategy for the Central Puget Sound.

While this DEIS sets the stage for a Bellevue decision on a preferred land use alternative, the DEIS is accurate in stating that the Sound Transit Board will make the final decision on the location of the light rail project. The light rail project will include a route alignment, station locations and a maintenance facility site. Sound Transit is pleased to see that the DEIS reflects Sound Transit's authority to plan, develop, and site the light rail project.

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 Claudia Thomas
Lakewood Mayor
 Pete von Reichbauer
Vice Chair, King County Council

CHIEF EXECUTIVE OFFICER
 Jori Earl



Comments

Responses

Carol Helland
 March 12, 2007
 Page Two

Sound Transit's East Link light rail project has begun an approximately three-year process to complete a project level EIS and preliminary design. Scoping for the EIS was held in October 2006, a Draft EIS is expected in late 2008 with a Final EIS anticipated in late 2009. The Sound Transit Board is expected to identify a preferred alternative by the end of 2008 and select the final project by the end of 2009.

In the Bel-Red corridor, the East Link EIS will analyze 4 route alternatives, including 5 station locations and three maintenance facility site alternatives (see attached map). A fourth maintenance facility site alternative is located near downtown Redmond. Current ST2 financial analysis indicates that if the City's stated preference for a tunnel in downtown Bellevue is included the East Link project will terminate at the Overlake Transit Center and the maintenance facility will need to be located in the Bel-Red corridor. A map of the East Link EIS alternatives is attached.

General Comments

- 1 • "HCT" and "light rail" are both used in reference to Sound Transit's proposed light rail project. The terminology should be consistent, and we suggest using "light rail".
- 2 • In parts of the Bel-Red EIS, the discussion portrays the East Link light rail project as if it is part of the Bel-Red corridor project. Clearly the land use plan and zoning for the Bel-Red corridor needs to be developed in coordination with Sound Transit's proposed light rail project and the future development of this area will be influenced by the ultimate location of light rail in the corridor. At the same time it should be stated in the Bel-Red EIS that the East Link light rail project proponent is Sound Transit, and that the light rail project is separate from the Bel-Red corridor project, which is a City of Bellevue project. We do not believe the project specific impacts (e.g. visual, ecosystems, hazardous materials, utilities etc) of the light rail project should be evaluated as direct impacts of the Bel-Red project in the Bel-Red EIS because East Link is a separate project from the Bel-Red project and the potential impacts of East Link will be appropriately evaluated in Sound Transit's East Link EIS process. Rather, the Bel-Red EIS should analyze how light rail transit supports and is supported by the land use redevelopment alternatives evaluated in the EIS and the potential cumulative impacts of the two separate but related projects.
- 3 • It is in the interest of the City, Sound Transit, and the region that the Bel-Red land use plan support transit oriented development at light rail stations. The City's decision on a preferred vision for the Bel-Red corridor is planned prior to a Sound Transit final decision on the light rail alignment and station locations. If the final location of the light rail project is different than assumed in the final preferred vision for the Bel-Red corridor, we anticipate that the land use plan and zoning for the corridor would be adjusted as appropriate to best support transit oriented development around the light rail stations.
- 4 The City of Bellevue proposes a 5 lane road in the NE 16th corridor. This same corridor is under consideration by Sound Transit for a light rail route. The development of these two projects will require close coordination between Sound Transit and the City. At this time, we are planning to

Sound Transit-1a

"Light rail" will be used as the appropriate terminology for Sound Transit's proposed East Link project. References to HCT will change accordingly in the FEIS.

Sound Transit-2a

The City Council's Bel-Red Corridor Planning Principles 5 and 6 and one of the Steering Committee's objectives provide direction to ensure that land use and transportation planning for the Bel-Red Corridor be conducted in a comprehensive and integrated manner, and include all appropriate modes of transportation, including light rail. The FEIS makes the appropriate distinction between the City's responsibilities for land use and transportation planning, and Sound Transit's responsibility to evaluate alternatives and to implement East Link light rail system. The Bel-Red Corridor Project is intended both to take advantage of the potential for light rail to serve the area and to inform the Sound Transit decision-making process.

Sound Transit-3a

The project principles adopted by the City Council support the City maximizing opportunities based on Sound Transit's planning for light-rail transit (LRT) in the corridor. The proposed light-rail station sites in the Preliminary Preferred Alternative analyzed in the FEIS are consistent with locations being studied by Sound Transit in its environmental process. If the final location for the LRT alignment through the corridor is different than what is assumed in the Preliminary Preferred Alternative, it is uncertain how the City would be able to adjust its planning and zoning assumptions to support transit-oriented development in the corridor, since the proposed LRT alignment on SR 520 that is being analyzed in Sound Transit's East Link DEIS assumes no stations in the corridor.

Comments

Responses

Carol Helland
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base the conceptual engineering design for the East Link EIS on the existing roadway configuration. We will also discuss in the cumulative impacts section the possibility that Bellevue would proceed in advance of Sound Transit with development of the NE 16th corridor, which could lead to modifications to the light rail route alignment.

Specific Comments

- 5 • The Bel-Red EIS will be completed sooner than the East Link EIS. Because the two projects are related to each other, the difference in EIS schedules, the need for Sound Transit to use some different analysis assumptions, and the fact that the Bel-Red EIS is a programmatic EIS whereas East Link is a more detailed project level EIS, there will likely be some differences in the analysis results between the two documents. Sound Transit policy is to use Puget Sound Regional Council (PSRC) approved land use forecasts for its transportation and other analyses. The PSRC forecasts have been recently updated and do not reflect the Bel-Red Plan update that will result after completion of the Bel-Red EIS process. As a result, the East Link EIS base analysis will use PSRC land use forecasts. The East Link EIS will also provide a separate evaluation of the Bel Red preferred alternative so the affects of the Bel-Red plan on light rail ridership and other light rail environmental issues can be understood. The likely main differences are described in the appropriate sections below.

Introduction

- 6 • Page 1-4 and 1-5 note identification of a preferred alternative for light rail and station locations as a goal for the planning process and states that the Bel-Red Corridor project will determine the optimal location of HCT stations. Sound Transit supports a planning process that considers the proposed Sound Transit East Link light rail project but would like to reiterate, as stated on page 2-4, that the Sound Transit Board will make the ultimate decision on the light rail alignment and station locations.

Description of Alternatives

The light rail route and station locations being studied by Sound Transit in the East Link EIS are generally consistent with and similar to, but not exactly the same as, those studied in the Bel-Red EIS. For example, the 122nd and 130th stations are similar but the East Link process is considering different station locations in the OHMC area and 152nd Ave NE. Sound Transit is also studying an alternative in the SR 520 corridor (East Link Alternative D5), which has similar station locations as the Bel-Red project's "No Action" Alternative.

- 7 It should be noted that the Sound Transit 2 package of projects, which includes East Link, will go to the voters in the fall 2007. Although it has been included in the No Build alternative, the East

Sound Transit-4a

Comment acknowledged.

Sound Transit-5a

Comment acknowledged.

Sound Transit-6a

The planning principles referenced in the chapter were adopted prior to Sound Transit's analysis of light rail in the corridor. At the time the principles were developed, the City hoped to identify its preferred alignments and station locations that would optimize redevelopment in the area. The City understands that the Sound Transit Board will make the ultimate decision regarding alternatives and station locations, but hopes that the Bel-Red Corridor FEIS may help inform the Sound Transit decision-making process.

Sound Transit-7a

Comment acknowledged.

Comments

Responses

Carol Helland
 March 12, 2007
 Page Four

- Link project is not funded at this time and has not completed its own environmental review process.

Air Quality

- Page 3-18 "It should be noted that each alternative assumes a varied number of LRT lightings and boardings (see Chapter 1 for more discussion), the highest number of which occur under Alternative 3; therefore, potential pollutant emissions from vehicles are assumed to be further reduced." This statement is confusing as it is not clear if the benefits to air emissions of LRT are included in Table 3-3 or if they would have additional benefits beyond the estimates in Table 3-3. The East Link EIS will provide an analysis of the affects on air emissions specifically from the East Link light rail project.

Watershed Processes

- Page 4-18: "...Although Sound Transit's proposed LRT route is not part of Bellevue's proposal for the Bel-Red Corridor, it is likely to cross all study area streams... This could—in conjunction with station-area development—present opportunities for enhancement... Developing the LRT line along this alignment in conjunction with the proposed new NE 16th Street arterial would allow this barrier to be eliminated..." - This is suggesting enhancements for impacts that haven't been evaluated yet by Sound Transit. Sound Transit's East Link Project EIS will identify any potential significant adverse impacts resulting from its light rail alternatives and determine the appropriate level of mitigation and comply with the applicable local, state, and federal requirements.

Noise

- Page 5-7 Operational Impacts – the statement "It is probable, however, that LRT noise would likely have cumulative impacts in the corridor." LRT contribution to noise is likely to be relatively small as the noise level from a light rail train is generally the same as that of a UPS truck and is lower than the noise level of a diesel bus. Sound Transit's East Link EIS will provide a detailed analysis of the potential noise impacts of the light rail project.

Environmental Hazards

Pages 6-18 and 6-19 provide an analysis of hazardous material sites near the various light rail stations this study has described. As discussed earlier, the East Link light rail project is a separate

Sound Transit-8a

The statement will be clarified to indicate that Table 3-3 is based on vehicle volumes, which takes transit use into account. Therefore, the reduction in pollutant emissions resulting from the shifting of passenger trips to transit is accounted for.

Sound Transit-9a

The City of Bellevue will participate in the review of the Sound Transit East Link Light Rail Project EIS, and also in the planning to mitigate potential adverse environmental impacts to environmentally critical areas. Existing critical areas regulations will apply, and opportunities for enhancements will be explored.

Sound Transit-10a

The statement will be clarified to indicate that light rail could have a cumulative noise effect in the corridor, the degree of which is unknown at this time.

Sound Transit-11a

The analysis provided is based not on the impact of light rail station development, but on the potential impact of construction within the larger development nodes that are planned within a quarter-mile radius of the potential stations. Within these areas, the analysis describes potential risks to developers of encountering contaminants during construction, based on the known history of contamination in these areas. The FEIS text clarifies the nature and area of potential impacts as they could occur from implementation of the Preliminary Preferred Alternative.

Comments

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- project from the Bel-Red project and the hazardous materials impacts of the East Link project will be addressed in East Link EIS.

Land Use

- 12 • Page 7-21 and 7-27 Consistency with Plans and Policies: "The action alternatives would provide sufficient employment and residential densities to facilitate and support future, planned LRT service to the study area." The East Link EIS will provide LRT ridership forecasts for potential stations with and without implementation of a Bel-Red corridor preferred plan. This information in conjunction with input from the City of Bellevue, community and other stakeholders and light rail project cost estimates, environmental, engineering and other information developed by Sound Transit will be considered by the Sound Transit Board in determining the best way to provide LRT service in the Bel-Red study area. If the final location of the light rail project is different than assumed in the final preferred vision for the Bel-Red corridor, we anticipate that the land use plan and zoning for the corridor would be adjusted as appropriate to best support transit oriented development around the light rail stations.
- 13 • If one of the three the light rail maintenance facility sites in the Bel-Red corridor is ultimately selected by the Sound Transit Board, then that use should not be prohibited by any contemplated changes to the City's Land Use Code within the corridor.
- 14 • Page 7-25 4th bullet -- "(Note that similar land uses could be displaced if LRT were developed along the NE 16th Street corridor,...)" Although this is true, the displacements for the NE 16th Street extension would be above and in addition to those for light rail and the DEIS should disclose cumulative impacts of all improvements in the corridor. The property acquisitions required for the light rail project will be disclosed in the East Link EIS.

15 As previously described, Sound Transit policy is to use Puget Sound Regional Council (PSRC) approved land use forecasts for its transportation and other analyses. The PSRC forecasts have been recently updated and do not reflect the Bel-Red Plan update that will result after completion of the Bel-Red EIS process. As a result, the East Link EIS base analysis will use PSRC land use forecasts. The East Link EIS will also provide a separate evaluation of the Bel Red preferred alternative so the affects of the Bel-Red plan on light rail ridership and other light rail environmental issues can be understood.

Aesthetics

- 16 • Pages 9-9 to 9-12. The direct visual impacts of the light rail project are addressed in this section. These will be appropriately evaluated in the East Link EIS.

Sound Transit-12a

See response to Sound Transit-3a.

Sound Transit-13a

See response to Sound Transit-30b.

Sound Transit-14a

The text has been clarified to indicate that Sound Transit is considering a similar corridor, whose width has not yet been defined, as part of the East Link EIS analysis.

Sound Transit-15a

Comment acknowledged.

Sound Transit-16a

Comment acknowledged. The discussion of potential visual impacts of light rail may help inform the Sound Transit decision-making process. It is acknowledged that Sound Transit is preparing its own evaluation of visual impacts as part of the East Link EIS.

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Transportation

- 17 • Page 10-5 2nd sentence – change “ST2 Plan” to “Draft ST2 Package”
- 18 • Page 10-5 Please include a figure showing BKR coded LRT lines
- 19 • Page 10-5 Include current transit assumptions in the network
- 20 • Page 10-5, Regional transit network changes – LRT 7001 (Everett-to-Kent) should be changed to (Everett-to-Kent-DesMoines Rd). Sound Transit is not planning a LRT line to Kent.
- 21 • Page 10-5, Regional transit network changes – The ST2 Draft Plan includes LRT from Lynnwood to Port of Tacoma and from downtown Seattle to Overlake via downtown Bellevue. The final plan is expected to be approved by the ST Board in late April 2007.
- 22 • Page 10-5, Regional transit network changes – Should the I-405 BRT system, as described in the I-405 Corridor Master Plan and I-405 South Corridor Bus Rapid Transit Pre-Design (WSDOT 2005), be included? The Sound Transit Long Range Plan also includes BRT along this corridor.
- 23 • Page 10-5, LRT East Link Project assumptions – The LRT 9003 line appears to be the same as the shortened LRT 7003 line.
- 24 • Page 10-13 – Railway – Add “The Sound Transit East Link Project is studying a light rail alternative in a portion of the BNSF right-of-way in the Bel-Red Corridor.
- 25 • Page 10-16 3rd paragraph – “...traffic impacts would occur in the North Bellevue neighborhood...” change “North Bellevue” to “Bridle Trails.”
- 26 • Page 10-29 “These results are somewhat counterintuitive...” – “Could you explain why, given the added capacity which results in reduced impact, are counter intuitive?”
- 27 • Page 10-31 NE 16th Street – Please explain what is meant by the following statement “...all action alternatives would include a five- to three- lane reduction along 136th Ave NE”.
- 28 • Page 10-37 1st paragraph – Change “early 2008” to “late 2008”
- 29 • Page 10-37 2nd paragraph – Change “156th Ave NE” to “152nd Ave NE”
- 30 • Page 10-39, Table 10-15 – No-Action 1-Hour AM alightings should be 569 (not 2,400) Reference “Subtotal Bel-Red Corridor” in Table 10-13.

Responses

Sound Transit-17a

Comment acknowledged. Chapter 10, in its entirety, will not be reprinted in the FEIS. However, we have noted the change and will indicate the correct date if referenced in other FEIS text.

Sound Transit-18a

The BKR model includes the most recent LRT alternatives included in Sound Transits Long Range Plan. Alternatives can be found at <http://www.soundtransit.org/x5313.xml>.

Sound Transit-19a

For both the Central Link and East Link projects, the Bellevue-Kirkland-Redmond (BKR) model assumed the mode of travel would be light rail, with headway/frequency rates of every 7.5 minutes, or 8 trains per hour. Dwell time at transit stops were coded to be 15 seconds, and it was assumed that the rail would be separated from vehicular traffic.

Sound Transit-20a

Comment acknowledged. There was a typo in the DEIS; it should have said Kent-Des Moines Road. This has been noted in the errata sheet.

Sound Transit-21a

Because the ST2 Plan was not adopted until April 2007, the model does not take into account the full extent of LRT adopted in the plan. However, since the assumptions for the Bel-Red modeling including a smaller LRT system, they provide more conservative results.

Sound Transit-22a

Comment acknowledged.

Sound Transit-23a

The LRT 9003 line is indeed the same as the shortened LRT 7003 line.

Sound Transit-24a

Comment acknowledged. This language is clarified in the discussion of the Preliminary Preferred Alternative in the FEIS.

Comments

Responses

Carol Helland
 March 12, 2007
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- 31 • Light rail transit ridership forecasts presented in the Bel-Red EIS were developed by the city's BKR model. Sound Transit will do ridership forecasts using its forecasting model and the results may be different.
- 32 • The traffic impact no-build and build analysis in the Sound Transit East Link EIS may also be different than those in the Bel-Red EIS because of differences in land use and transportation assumptions.
- 33 • Parking prices are one of the major contributing factors in determining transit ridership. Is parking in the Bel-Red study area assumed to be free or paid in the no-action and action alternatives? If there are differences in parking assumptions (free vs. paid) between the no-action and action alternatives, what are the differences?

Public Services and Utilities

- 34 • The direct impacts of the light rail project are addressed in parts of this section. These will be appropriately evaluated in the East Link EIS.

Sound Transit has and will continue to work closely with the City of Bellevue with the intent that the East Link light rail project and Bel-Red Plan update are well coordinated and that reasonable assumptions regarding the Plan update are reflected in the East Link EIS.

This concludes our comments on the Bel-Red Project DEIS. If you have any questions please do not hesitate to contact me at 206-398-5206 with any questions you have about these comments.

Sincerely,



Leonard McGhee,
 Bellevue-Redmond Segment Manager,
 East Link Project

LM/ab: Carol Helland Bel-Red Corridor Project DEIS

Attachments: East Link EIS Alternatives Map
 Segment D: Alternative Maintenance Facilities

c: Kevin O'Neil, City of Bellevue
 Don Billen, Sound Transit

Sound Transit-25a

Comment acknowledged, Bridle Trails was the intended area of reference.

Sound Transit-26a

The counterintuitive statement refers to the previous paragraph in which it is identified that Alternative 3 would have the least amount of LOS E/F intersections, yet have the highest average delay and highest land use density. This paragraph then explains why, in fact, the results make sense, i.e., the added capacity referred to in this comment.

Sound Transit-27a

This statement means that the proposed NE 16th Street would be five lanes in all three action alternatives near 136th Place NE. At the location where NE 16th Street and 136th Place NE come together, NE 16th Street would transition to three lanes to match the cross-section of 136th Place NE.

Sound Transit-28a

Chapter 10, in its entirety, will not be reprinted in the FEIS. However, we have noted the change and will indicate the correct date if referenced in other FEIS text.

Sound Transit-29a

Chapter 10, in its entirety, will not be reprinted in the FEIS. However, we have noted the change and will indicate the correct street if referenced in other FEIS text.

Sound Transit-30a

Comment acknowledged. This will be included in the errata sheet in the FEIS.

Comments**Responses****Sound Transit-31a**

The City acknowledges that Sound Transit's ridership forecasts on LRT documented in the future East Link EIS may be different from those documented in this EIS.

Sound Transit-32a

The City acknowledges that Sound Transit's EIS may also have different traffic impact analyses for the build and no-build alternatives due to differences in land use and transportation assumptions.

Sound Transit-33a

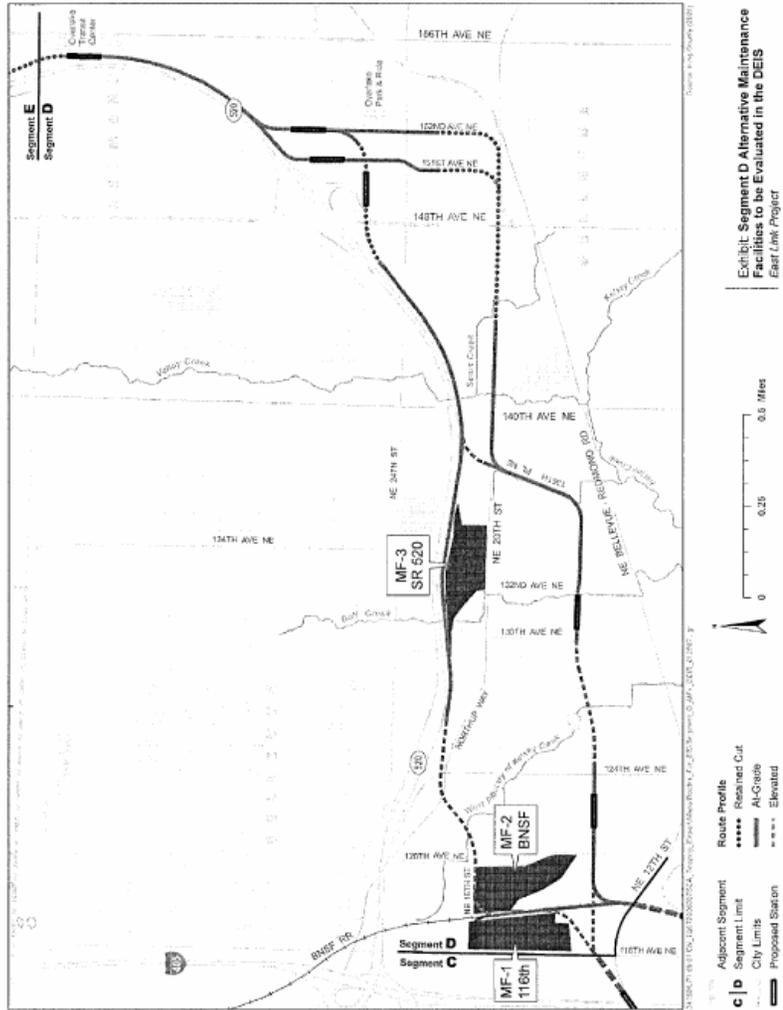
Parking was assumed to be free in the BKR model for all alternatives, although the City acknowledges that the price of parking is a major contributing factor to transit ridership.

Sound Transit-34a

Comment acknowledged. The discussion of potential impacts to public services and utilities may help inform the Sound Transit decision-making process. It is acknowledged that Sound Transit is preparing its own evaluation of impacts to public services and utilities as part of the East Link EIS. It is noted in this FEIS that Sound Transit is undergoing its own analysis of impacts as part of the East Link EIS.

Comments

Responses



Comments

Responses

Complete Bel Red DEIS Comments

Page 1 of 2

O'Neill, Kevin

From: Stacie LeBlanc [stacie.leblanc@clearwire.net]
Sent: Monday, March 12, 2007 4:43 PM
To: BelRed; Helland, Carol
Cc: Stacie LeBlanc Anderson
Subject: Complete Bel Red DEIS Comments
Attachments: Bel Red DEIS Comments03.07doc

Carol-

Here are my completed comments. Please disregard my previous comments if this email is in time.

Thanks,

Stacie LeBlanc Anderson
 425-462-8057

March 10, 2007 Subject: Comments on the DEIS for the Bel-Red Corridor Study

- 1 It appears that Sound Transit's desires to provide High Capacity Transit (HCT) in the form of light rail (LR) rather than Bus Rapid Transit, or BRT, is driving future land use changes, rezoning, densification, probable business and property condemnations, and negative neighborhood impacts (in the form of additional noise and light pollution, congestion, loss of neighborhood businesses, and station location-related crime) in/near the Bel-Red corridor of the City of Bellevue.
- 2 City staff and Council members have admitted at Council meetings that Sound Transit wanted to locate the light rail corridor in the middle of the Bel-Red Sub-area (between SR 520 and the Bellevue Redmond Road) so that it could be rezoned and the subsequent densification could more fully support Sound Transit's ridership desires. In other words, ST would not be interested in locating light rail on 520 because they feared they wouldn't achieve the necessary ridership, and that deficiency would threaten the vote in the fall of 2007.
- 3 This action to run the light rail corridor down the center of the Bel-Red Sub Area would begin the process of property condemnations and sliver takings that I sought to avoid by submitting a Comprehensive Plan Amendment to the City of Bellevue on January 31, 2006, which states:
 Suggestion for a non site-specific Comprehensive Plan Amendment:
 Block 2: Proposed Amendment Language.
 "As befitting its role as a regional and national leader, the City of Bellevue will protect the property rights of its citizens by adopting a policy whereby the City of Bellevue will not take or condemn private property owned by one citizen (or group) in order to transfer it to another citizen (or group) for tax creation or redevelopment purposes".
 The council did not opt to act on this proposed language change to protect Bellevue property owners.
- 4 While both the City of Bellevue and Sound Transit have the power of eminent domain, it is my fervent hope that the City of Bellevue and Sound Transit will not engage in condemnations or sliver takings of private property in the Bel-Red corridor, facilitated by sweeping land use changes brought on by Sound Transit's light rail project.
 The City of Bellevue should not take property from one owner in order to give it to another for tax creation purposes, or to redevelop certain portions of the Bel-Red corridor to support Sound Transit's light rail plans.
 The original property and business owners in the corridor deserve to benefit from any gain from the increase in value of their investments, and should be able to decide when and if to develop those properties at any particular time (while in compliance with city codes) according to supply and demand in the market.

3/13/2007

Stacie LeBlanc-1

This planning effort was initiated by the City Council to accomplish several goals, and is not driven by just the East Link project. While the City intends for the planning update to inform Sound Transit decisions on how to serve the corridor (consistent with Bel Red Corridor Planning Principle 5), the project was initiated due to the need to update the overall vision for this corridor, given that the *Bel-Red/Northrup Subarea Plan* has not been reviewed or updated in a comprehensive manner since the late 1980s. The project is largely driven by the City's desire to develop a long-term comprehensive plan for this area, as articulated in the City Council's Bel-Red Corridor Planning Principle 1, discussed in Chapter 1 of the DEIS.

Stacie LeBlanc-2

The City Council's Bel-Red Corridor Planning Principle 5 and one of the Steering Committee's objectives provide direction to take advantage of the potential opportunities created by extension of Sound Transit's light-rail system through the Bel-Red Corridor. The Preliminary Preferred Alternative considers potential light-rail stations as opportune locations to plan for transit-oriented development nodes that are walkable and contain a mix of different land use types (office, housing, retail) at densities that are supported by transit service. The Bel-Red Corridor Project will help inform the Sound Transit Board, which is ultimately responsible for deciding on the light-rail transit (LRT) alignment and station locations.

Stacie LeBlanc-3

An LRT alignment through the middle of the Bel-Red Corridor provides the greatest opportunity to develop a transit-oriented land use pattern near stations. This vision is embodied in the Preliminary Preferred Alternative that was developed by the Steering Committee for analysis in the FEIS.

Comments

Complete Bel Red DEIS Comments

Page 2 of 2

My comments fall under the heading of probable significant impacts, posted on the COB website:

Comments should be as specific as possible and may address either the adequacy of the document or the merits of the alternatives or both. Comments may be on the methodology, alternatives, elements of the environment, mitigation measures, probable significant impacts and potential conditions on any licenses or approvals to be considered by the city: http://www.ci.bellevue.wa.us/bel-red_open_house_news_release.htm

The No-Action alternative must be chosen.

Respectfully submitted,
Stacie LeBlanc Anderson
stacie.leblanc@clearwire.net

Responses

The Steering Committee considered alternate alignments – including along Bel-Red Road and SR 520 – and determined that an alignment through the middle of the corridor best met the City Council’s planning principles and their own objectives.

Stacie LeBlanc-4

See response to Bridle Trails Community Club-8. The Preliminary Preferred Alternative provides a vision for future land use and transportation, and requires no one to take affirmative action with respect to the continued use of their property.

3/13/2007

Comments

Responses



12 March 2007

Carol V. Helland
 Land Use Division Director
 Environmental Coordinator
 City of Bellevue
 PO Box 90012
 Bellevue, WA 98009-9012

**RE: Bel-Red Corridor Project
 Draft Environmental Impact Statement**

Dear Ms. Helland:

The City of Bellevue Transportation Department Title VI Coordination Team appreciates the opportunity to comment on the recently released Bel-Red Corridor Project Draft Environmental Impact Statement (DEIS).

Title VI of the Civil Rights Act states that "No person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Two Executive Orders — Environmental Justice and Limited English Proficiency — expand the scope of inclusion and equality all federally-funded agencies must achieve.

As you are aware, Bellevue is an increasingly diverse city. In the 2000 census, 26 percent of residents identified themselves as a race other than white, up from 14 percent in the 1990 census. To ensure the Transportation Department programs and activities do not exclude or have disparate impacts on protected populations, the Title VI Coordination Team is developing procedures to document compliance with the intent of the Act and Executive Orders.

While these procedures are being implemented in phases, the Title VI Coordination Team looks for opportunities to advance its efforts. As such, team members met with the Bel-Red Corridor Project DEIS project managers to outline several ways to increase outreach to communities of concern and more fully incorporate Title VI requirements into the DEIS process.

We are pleased with the response of the Bel-Red Project Team to incorporate Title VI requirements into the DEIS. Specifically, the Team included language describing the City's policies for compliance with Title VI and the description of the study area profile in the DEIS document. This is helpful for readers to understand how the project will impact communities of concern. We also appreciate the effort made to go beyond noticing requirements of the State Environmental Protection Act by issuing a press release regarding the opportunity to comment on the DEIS to media outlets serving minority populations in order to reach out to the diverse members of the Bellevue community. An additional item discussed with the Bel-Red Project Team but not pursued was the placement of informational posters at the Highline Community Center

Comments

and Crossroads Mini-City Hall. This is an opportunity to keep in mind for future EIS notification processes as a means to reach communities of concern.

Thank you for including a discussion of consideration and mitigation of impacts in Appendix E. I am pleased to see that alternatives developed through this study present the opportunity to improve quality of life for all residents, and particularly include aspects to benefit Title VI populations including improved transit service, pedestrian facilities, and dispersed affordable housing. I would like to note one necessary correction in the third paragraph of Appendix E. The four block groups evaluated as part of the study area demographic profile cover the entire study area, including extending to 156th Avenue NE (not 148th Avenue NE as stated in the text) as well as to surrounding neighborhood areas.

As with the Bel-Red Corridor Project DEIS, the development of future Environmental Impact Statements will require the following efforts to comply with the requirements of Title VI, as well as the Executive Orders relating to Environmental Justice and Limited English Proficiency:

- Include available city census data in the EIS and analyze the impacts of the proposed projects on identified communities of concern.
- Expand the public involvement process in order to include identified communities of concern.
- In the Fact Sheet section about the comment process, explicitly state the opportunities and means for the public to comment on the EIS and offer accommodations for people needing alternative formats of the document in order to make the document accessible to all.
- Include specific language describing the City's policies for complying with Title VI as an appendix to the EIS.

Thank you for notifying the Title VI Coordination Team of the Bel-Red Corridor Project DEIS comment period. The Title VI Coordination Team looks forward to future collaboration in the remainder of the Bel-Red Corridor Project environmental process and in subsequent efforts.

Sincerely,

Jen Benn
 Transportation Title VI Coordinator
 City of Bellevue
 PO Box 90012
 Bellevue, WA 98009-9012
 425-452-4270

Responses

City of Bellevue-1

Comment acknowledged. The FEIS errata sheet will provide a correction to the demographic profile.

City of Bellevue-2

Comment acknowledged. While the public comment opportunities for this FEIS are concluded, the City of Bellevue is committed to implementing the provisions of Title VI of the Civil Rights Act of 1964, and therefore will implement appropriate efforts in subsequent phases of this project, including the deliberations on implementation.

Comments

Responses

Page 1 of 1

Helland, Carol

From: BelRed
Sent: Monday, March 12, 2007 6:00 PM
To: 'Shannon Boldizar'; BelRed; Helland, Carol
Cc: Betty Nokes; gregg.jordshaugen@mossadams.com; earl@gmi.com; DEANREBUHN@aol.com
Subject: RE: Bel Red DEIS Comment Letter -- Bellevue Chamber

Thanks, Shannon. All comment letters received will be shared with the project steering committee.

Kevin O

From: Shannon Boldizar [mailto:sboldizar@bellevuechamber.org]
Sent: Monday, March 12, 2007 5:41 PM
To: BelRed; Helland, Carol
Cc: Betty Nokes; gregg.jordshaugen@mossadams.com; earl@gmi.com; DEANREBUHN@aol.com
Subject: Bel Red DEIS Comment Letter -- Bellevue Chamber
Importance: High

Hi Carol,

Attached is the Bellevue Chamber of Commerce's letter responding to the Bel Red Corridor DEIS public comment period. We would appreciate you sharing it with members of the Bel Red Corridor Steering Committee. Thank you!

Shannon Boldizar
Government Affairs Director
Bellevue Chamber of Commerce
425-213-1203

3/13/2007

Comments

Responses

Page 1 of 1

Helland, Carol

From: Shannon Boldizar [sboldizar@bellevuechamber.org]
Sent: Monday, March 12, 2007 5:41 PM
To: BelRed; Helland, Carol
Cc: Betty Nokas; gregg.jordshaugen@mossadams.com; earl@gmi.com; DEANREBHUN@aol.com
Subject: Bel Red DEIS Comment Letter -- Bellevue Chamber
Importance: High
Attachments: Bel Red Public Comment Letter 2007.pdf

Hi Carol,

Attached is the Bellevue Chamber of Commerce's letter responding to the Bel Red Corridor DEIS public comment period. We would appreciate you sharing it with members of the Bel Red Corridor Steering Committee. Thank you!

Shannon Boldizar
Government Affairs Director
Bellevue Chamber of Commerce
425-213-1203

3/13/2007

Comments



March 12, 2007

Bel-Red Corridor Steering Committee
 P.O. Box 90012
 Bellevue, WA 98009

Re: Bel-Red Corridor Project DEIS – Public Comment Period

On behalf of the Bellevue Chamber of Commerce Board of Directors, we would like to provide comments on the Bel-Red Corridor Draft Environmental Impact Statement (DEIS) to help guide your decision-making process in selecting a preferred alternative for this critical Eastside corridor.

The Bel-Red Corridor has long been a major business hub and employment area and we appreciate the City taking a programmatic approach to the planning effort and integrating the Planning & Community Development and Transportation departments. When taking on a large-scale, long-term project like the Bel-Red Corridor, involving all aspects of the community is important and we appreciate the Council ensuring representation from the business community on the Steering Committee.

While the Chamber is not taking a position on one specific alternative, we do want to provide constructive feedback and comments from the business perspective to help guide the Steering Committee's decision making process. We anticipate that a hybrid version will be developed based on public comments. With that said, we are not in favor of the "no action" alternative as a final outcome. Following are our comments related to the Bel Red Corridor DEIS.

Impacts to Existing Businesses

As the City moves forward with the Bel-Red Corridor Plan, it must give priority consideration to minimizing displacement and disruption to current businesses. Revenue from business taxes and retail sales in the Bel Red Corridor are major drivers in the City's general fund budget and the City should carefully study the fiscal impacts of changing land use codes over time.

Even if a formal plan is adopted in 2007-2008, redevelopment of the Bel-Red Corridor will occur over the next several decades and will take place one property at a time, just like we have witnessed in the Downtown core. As additional uses are considered, the City must ensure that market forces, not excessive land use regulations, determine the nature of future redevelopment. By allowing existing zoning to be grandfathered in as the base, the area will incur a more natural transition and will maintain economic viability for the business community over the long-term.

Further, the City must be careful not to create "legal non-conforming uses" for existing businesses. This puts a cloud over business and property owners, leaving both vulnerable and creating unnecessary uncertainty in the marketplace. It also causes difficulty in obtaining financing and insurance for development projects – both industries are again, major drivers to the Eastside economy. Many lenders and insurers view these properties as questionable and less secure, often leading to less favorable financing terms, or in some cases outright rejection. This can lead to vacancies and reduced property and business values, all contributing negatively to the economy overall. By allowing the market to dictate development, existing businesses will have greater opportunity and the city will also benefit financially.

BELLEVUE CHAMBER 302 BELLEVUE SQUARE BELLEVUE, WA 98004 PHONE: 425.454.2454 www.bellevuechamber.org

Responses

Bellevue Chamber of Commerce-1

The Preliminary Preferred Alternative is a "hybrid" of the several alternatives analyzed in the DEIS, and incorporates elements of many of the alternatives, including components of the No Action-Alternative.

Bellevue Chamber of Commerce-2

The DEIS analysis found that implementation of any of the action alternatives could result in a loss of employment in the light industrial sector over and above the gradual decline currently taking place. The DEIS (pages 8-16 to 8-17) identifies several potential mitigation measures to address economic and other impacts to businesses currently in the corridor. The policy direction provided by the Steering Committee relating to the Preliminary Preferred Alternative is to accommodate existing businesses in the corridor, while allowing new types of land use, such as housing, to be developed over time. In addition, the Preliminary Preferred Alternative contemplates preserving many of the service and retail uses that currently provide an important tax base to the city, and more of these uses are contemplated in the future.

Bellevue Chamber of Commerce-3

See response to Bridle Trails Community Club-8.

Bellevue Chamber of Commerce-4

See response to Bridle Trails Community Club-8.

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Multi-Jurisdictional Planning Efforts

Commerce doesn't know borders and neither does the public. While we want to do what's in the best interests of Bellevue, the City should take multi-jurisdictional planning efforts into account and ensure that decisions make sense for business and the region overall. As you are aware, Redmond has selected the most ambitious plan for growing the Overlake area. We encourage the City to continue to work closely with Redmond and approach the entire Bel Red and Overlake corridor from a regional perspective. Competition can be beneficial, and we urge both cities to reconcile the impacts of each other's choices in their respective planning efforts.

Density and Building Height

It is imperative that the Steering Committee address the "how high" question in relation to density and building height during the planning phase of this project. Most importantly, we urge the City to think about the impacts on the Downtown core and on other business districts like Factoria, Eastgate and Crossroads before determining height and density thresholds. City planning efforts explicitly chose the central business district to absorb growth and subsequently, building heights were increased. Whatever plan is ultimately selected for the Bel Red Corridor, it must be complementary to these business districts and the City must be cautious not to force requirements but instead, let the market control outcomes in these areas.

Outreach to Business

While we are pleased to have three strong business representatives on the Steering Committee, more outreach to both *business and property* owners in the Bel Red Corridor is needed. We urge the City to find other avenues to inform and educate the business community about the Bel Red Corridor DEIS and potential impacts and outcomes. The Chamber would welcome the opportunity to partner with the City on outreach – suggestions from our members include a business roundtable or task force, panel discussion, mailings, etc. Please let us know how we can work with you to better communicate with businesses in this project area.

Transportation and Parking

Clearly one of the key components driving the Bel Red Corridor plan is transportation. The Chamber's goals when addressing transportation projects include cost effective congestion relief and increased mobility and capacity to accommodate future population growth. The plan was predicated on light rail, but the City should not forget that roads need to be of equal importance in the Bel Red Corridor and consequently deserve greater attention and consideration as part of the overall DEIS and financing plan.

Bel Red is a corridor of connections and convenience. It connects residents and businesses. It connects Overlake and Crossroads. All are connected to Downtown Bellevue and other business districts and neighborhoods. As a connecting corridor, the eventual build-out of the transportation system is critical to ensuring future economic vitality and adequate parking is an essential component of this equation.

To plan for high capacity transit and transit-oriented development in the DEIS without providing ample parking is simply irresponsible. Even if redevelopment occurs over several decades, the reliance on automobiles and basic trips between businesses and residences will not dissolve, and the ability to get from residences and neighborhoods to businesses and recreation opportunities will simply not be solved by one light rail line with up to two (potential) stations. Further, commerce will remain in the Bel Red Corridor and not everyone will be able to access those businesses and residents by bus or rail. We urge the Steering Committee to thoroughly review this important component of the DEIS and include more parking as part of the final plan.

Bellevue Chamber of Commerce-5

Staff members from the City of Bellevue and the City of Redmond have met periodically during the course of each city's planning process, which have run more or less concurrently. While not analyzed and documented as part of this FEIS, the cumulative transportation impacts of development in Overlake and in the Bel-Red Corridor are being considered in a separate process. This analysis will help inform future implementation, phasing, and financing strategies (see Coca-Cola Real Estate-1).

Bellevue Chamber of Commerce-6

See response to Legacy Companies-4.

Bellevue Chamber of Commerce-7

See responses to Bridle Trails Community Club-2 and -3. The City conducted several Special Public Outreach efforts to the business community at key points in the planning process:

- Business and property owners panels:
 - Prior to selecting DEIS Alternatives: 05/16/06 and 06/06/06
 - Prior to selecting Preliminary Preferred Alternative: 03/14/07
- Business and Property Owner "conversation" with Steering Committee
- Developer Open House: 04/25/07

In addition, Bellevue staff provided briefings to the Bellevue Chamber of Commerce on December 12, 2005, and February 8, 2007, and to the Bellevue Downtown Association on February 14, 2007.

The complete chronology of public involvement is provided in Appendix B.

Comments

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11 In addition, more attention must be given to traffic modeling and trip generation ratios. Further, the impacts of the BNSF rail – and potential trail – line, should be integrated into the final plan.

Critical Areas Ordinance (CAO) and Environmental Concerns

12 The Chamber worked closely with the City to adopt the current CAO and ensure a “win-win” for all parties involved, particularly the environment. Proposing additional increases in some buffers in one area of the community goes beyond the spirit of cooperation inherent in the CAO. The CAO provides good function and value and specifically includes incentives that could be beneficial for the Bel Red Corridor. The City must remain consistent and comply with current standards. More onerous environmental regulations and further regulatory burden are not necessary – any additional guidelines should be voluntary and provide incentives. We suggest the City reconsider what they are trying to achieve in the Bel Corridor overall with regard to the environment. It appears to the business community that the focus is one of public access and recreational opportunities, not larger buffers and the CAO. We urge the City to look at other alternatives to create access, open space and recreation.

Financing

13 Financing alternatives for the corridor need to be vetted before the final EIS is adopted. The fact that RTID, Sound Transit 2 and the BNSF rail to trail conversion all remain unfunded at this early stage, needs to be taken into consideration. In addition, a thorough fiscal analysis of the long term impacts to businesses in the Corridor, and the City in terms of sales, B&O and property tax revenue, should be completed as part of the final EIS.

14 As we all know, there are a number of important infrastructure improvements needed in Bellevue and on the greater Eastside, and while we recognize that funding isn’t available for every project right now, principles should be established to clarify priorities for future support. The Chamber believes that funding for the I-405 and SR 520 corridors takes precedence given their significance movement of people and freight, and their direct link to the region’s economic competitiveness. Consistent with our Budget Task Force principles, the Chamber believes that previously adopted business district plans should precede financing for redevelopment in the Bel Red Corridor. Allocations should first be directed toward completing projects in the Downtown Implementation Plan (DIP), and redevelopment of other neighborhood business districts like Factoria and Crossroads should follow.

We appreciate your recognition of the long-term needs and potential uses for the Bel-Red Corridor. This area of Bellevue is critical to our economic viability and competitiveness, as well as a valuable asset to our region in terms of business. The Bellevue Chamber commends your leadership and also recognizes the challenges that lay before you. We appreciate the opportunity to share our comments and thank you for your consideration.

Sincerely,



Betty Nokes
 President & CEO
 Bellevue Chamber of Commerce



Gregg Jordshaugen
 Chair
 Bellevue Chamber Board of Directors

Bellevue Chamber of Commerce-8

Chapter 10, Transportation, of the Bel-Red Corridor Project DEIS addresses transportation in a comprehensive manner, including nonmotorized transportation, transit, light rail, and a very extensive set of roadway improvements. Providing a multimodal transportation system is critical to support the proposed land use changes. A specific plan to finance transportation infrastructure and other public improvements is being developed as a part of the implementation strategy.

Bellevue Chamber of Commerce-9

Comment acknowledged. Parking supply will be created and integrated with specific development proposals.

Bellevue Chamber of Commerce-10

While not specifically addressed in this programmatic DEIS, it is anticipated that subsequent development regulations will require that on-site parking be provided in new projects to accommodate the needs of residents, shoppers, and employees.

Bellevue Chamber of Commerce-11

The potential conversion of the Burlington Northern Santa Fe (BNSF) rail corridor to one that accommodates pedestrians and bicyclists is an integral component of the proposed nonmotorized transportation system.

Bellevue Chamber of Commerce-12

The Preliminary Preferred Alternative assumes the existing critical areas regulations will govern redevelopment adjacent to streams and wetlands. However, the future vision, which

Comments

Bellevue Chamber – Bel Red Corridor Public Comment Letter
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c: Bellevue Chamber Board of Directors
Bellevue City Council
Steve Sarkozy, City of Bellevue
Matt Terry, City of Bellevue
Goran Sparman, City of Bellevue
Mayor Rosemarie Ives, City of Redmond
Redmond City Council
Christine Hoffmann, Redmond Chamber of Commerce
Dean Rebhuhn
Earl Overstreet
Leslie Lloyd, Bellevue Downtown Association

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implements the City Council Bel-Red Corridor Planning Principle 9 (Sustainability), also anticipates enhancing the environmental functions and values of the stream corridors, and these enhancements are proposed to be accomplished through incentives and City programs.

Bellevue Chamber of Commerce-13

The EIS does not directly cover funding issues. However, the City acknowledges that funding and implementation of major regional transportation projects will significantly impact the corridor. Still, the Bel-Red Corridor Preliminary Preferred Alternative provides a vision for the corridor that is designed to be achievable over the planning horizon whether or not light rail serves the corridor. In addition, all of the major transportation projects assumed in the DEIS are part of adopted regional transportation plans (see WSDOT-4).

While fiscal impact is not addressed as part of the FEIS, a financing plan and fiscal analysis is contemplated as part of the overall implementation strategy that will be developed to implement the preferred vision ultimately adopted by City Council.

Bellevue Chamber of Commerce-14

Funding for regional transportation infrastructure (SR 520, I-405) is the responsibility of the Washington State Department of Transportation and is not considered in this EIS, although anticipated improvements to those regional roadways are assumed in the Bel-Red Corridor traffic modeling. All regional transportation projects assumed in the DEIS are consistent with adopted regional plans, although many of these projects are currently unfunded (see WSDOT-4). Local transportation infrastructure funding is obtained from a variety of sources, the most significant of which is the Capital Investment Program, the priorities of which are established by the City Council and may be reevaluated based on information contained within this EIS.

Comments

Responses

Helland, Carol

From: Melody Forsythe [ForsM@foster.com]
Sent: Monday, March 12, 2007 4:24 PM
To: Helland, Carol
Cc: Tayloe Washburn; gjohnson@wrightrunstad.com
Subject: Wright Runstad & Company's Bel-Red DEIS Comment Letter

Importance: High

Attachments: SFX18DE.pdf



SFX18DE.pdf (891
KB)

<<SFX18DE.pdf>>

Ms. Helland:

I am attaching the referenced document at the request of Tayloe Washburn and Gregory Johnson. Please give me a call if you have any questions. You will also receive a copy by facsimile to 425-452-5247, and by regular mail.

Thank you,

Melody Forsythe
Legal Assistant to J. Tayloe Washburn, Judith M. (Judy) Runstad, Thomas M. Walsh and Richard L. Settle
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Comments**Responses****Memorandum**

To: Carol Helland, SEPA Responsible Official
City of Bellevue

From: Gregory K. Johnson, President,
Wright Runstad & Company
1201 Third Avenue, Suite 2700
Seattle, WA. 98101

Date: March 12, 2007

Subject: Wright Runstad & Company's Bel-Red DEIS Comment Letter

Thank you for the opportunity to comment on the Bel-Red Corridor Project Draft Environmental Impact Statement (DEIS). With its recent acquisition of a large portion of the former Safeway distribution center site, Wright Runstad and Company (WRC or Wright Runstad) is now the largest landowner in the Bel-Red Corridor, with a single site of approximately 36 acres.

We commend the City on the extent to which many of the plan-level impacts associated with the transformation of the Bel-Red Corridor have been evaluated in the DEIS. The City's proposal to transform this corridor in such a comprehensive manner necessitates a thorough EIS evaluation of the impacts and mitigation measures of the proposed comprehensive plan and zoning changes. The purpose of this EIS is to: 1) provide the City decision-makers and the public with an informed basis on which to select its new vision for the Bel-Red Corridor; and 2) provide a predictable framework for property owners in the Bel-Red Corridor and the public to proceed to develop their property in future years. With these twin goals in mind, Wright Runstad offers below its comments and suggestions for the FEIS preparation.

Wright Runstad has made a major investment in the Bel-Red Corridor and has carefully evaluated its potential for future development in a manner that incorporates the Bel-Red Corridor planning principles. The Steering Committee and City of Bellevue have in the Bel-Red Corridor process an opportunity to build on the area's existing strengths and character and create in future years a new neighborhood which exemplifies the very best principles in sensible GMA and community planning. The area's natural resources and its new development can be developed in a way that implements the highest sustainability concepts. Building from existing assets, the land use and transportation features, including high capacity transit, can be planned and built in a tightly coordinated manner. The 36 acre Wright Runstad site will provide an ideal opportunity to showcase these progressive planning concepts and set a high bar for quality development of the entire corridor. The DEIS provides a good initial information base to evaluate potential future uses in the Bel-Red Corridor, including the Wright Runstad property. Many of the DEIS comments below suggest ways in which the FEIS analysis can build on the DEIS and provide the

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City and those who may develop in the future in this area the best possible analysis for informed decision making.

General Comments

A public policy for the City and our region is the need to make the promise of GMA work in this region in coming years. Establishing clear urban growth boundaries, outside of which urban growth is not allowed, is one component. The key reciprocal component is to ensure we can achieve, not just plan for, compact dense urban growth, especially in areas well served by roads and public transit. Sandwiched between two existing urban centers - downtown Bellevue and Overlake - the Bel-Red Corridor is a test case for the extent to which GMA can work in urban areas. Its location makes it inevitable in coming years that it will be transformed. To do so in a thoughtful way through the Bel-Red planning process, which takes into account the range of policy issues and public views, is commendable. The leadership demonstrated by the Bel-Red Steering Committee and reflected in the DEIS evidences the City's commitment to create over time in portions of the Bel-Red corridor, dense urban areas served by both roads and transit. The added benefit of Sound Transit's light rail East Link in future years coming through the corridor heightens the opportunity to utilize this area as a textbook case for effective GMA planning and intelligent use of city and regional infrastructure investments.

The City is using the EIS and Bel-Red planning process to create essentially a new neighborhood in the Bel-Red Corridor, which combines key elements of the existing neighborhood uses and a new long-term vision for the corridor which promotes overall City, King County and statewide policies. Future development in the Bel-Red Corridor will complement the denser urban growth called for in downtown Bellevue and the Overlake area.

Alternatives, P. 1-7

The City staff and Bel-Red Steering Committee have indicated that the Preferred Alternative recommended to the City Council this spring may well not match any particular DEIS alternative, but may be a hybrid. Given all the new information gathered since the EIS scoping process began, the FEIS should add and evaluate any new information which may not correspond exactly with the specific components of existing alternatives. For example, Wright Runstad developed late in 2006 some initial redevelopment concepts for its 36 acre site, and submitted those in a November 30, 2006 memo to the Bel-Red Corridor Steering Committee, a copy of which is attached to this SEPA Comment Letter. It recommends the Committee adopt a version of Alternative 3, including certain specified modifications to Alternative 3. Additional information such as this should be included within the scope of what is evaluated in the FEIS.

Wright Runstad continues to recommend that the Steering Committee start with Alternative 3 as its Preferred Alternative, include whatever additional planning components, such as those identified in the attached letter, it deems desirable, and ensure that any significant adverse environmental impacts of its Preferred Alternative are thoroughly evaluated in the FEIS.

Responses

Wright Runstad & Co.-1

The Preliminary Preferred Alternative is a hybrid of the action and no-action alternatives evaluated in the DEIS, but it most closely resembles Alternative 3. The analysis in the FEIS is based on the direction provided by the project Steering Committee, including evaluating the potential for greater heights in several potential development nodes. However, this is a programmatic EIS, so it does not evaluate anything on a project-level pertaining to any specific development proposal.

Wright Runstad & Co.-2

See response to Wright Runstad & Co. -1

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Land Use, Chapter 7

The EIS appropriately notes the extent to which the proposed uses under Alternative 3 in particular will implement City, County and state policies, as well as the specific policies adopted for the Bel-Red Corridor.

Compliance with King County County-wide Planning Policies

The EIS correctly identifies at p. 7-10 the extent to which creating dense urban areas served by transit, as proposed in the Corridor, carries out the King County-wide Planning Policies (CPPs). We would note that the Bel-Red Corridor alternative ultimately adopted should also comply with the following specific CPPs:

FW – 12(b): The growth targets established pursuant to the methodology described in LU-25c and LU-25d shall be supported by both regional and local transportation investments. The availability of an adequate transportation system is critically important to accommodating growth. The regional responsibility shall be met by planning for and delivering county, state, and federal investments that support the growth targets and the land use pattern of the County. This includes investments in transit, state highways in key regional transportation corridors, and in improved access to the designated Urban Centers. The local responsibility shall be met by local transportation system investments that support the achievement of the targets. (Emphasis added)

Discussion:

3 As part of the Bel-Red process it is critical that the City of Bellevue identify the City investment needed on key intersections and roadways to allow the future growth called for under the Preferred Alternative and to address existing congestion and capacity challenges. This local investment will complement the regional and state expenditures in the area, as called for in this CPP. The City must invest in significant improvements on all major roadways required in the Bel-Red area simply to deal with projected growth in the vicinity, even if no changes are made in the Bel-Red zoning. DEIS at p. 2-8.

LU 25(a): Each jurisdiction shall plan for and accommodate the household and employment targets established pursuant to LU-25c and LU-25d. This obligation includes:

- (a) Ensuring for adequate zoning capacity; and*
- (b) Planning for and delivering water, sewer, transportation and other infrastructure, in concert with federal and state investments and recognizing where applicable special purpose districts; and*
- (c) Accommodating increases in household and employment targets as annexations occur.*

Wright Runstad & Co.-3

See response to Bellevue Chamber of Commerce-13. The Bel-Red Corridor Project is consistent with the King County County-wide Planning Policies. The City plans on developing a financing plan for needed infrastructure based on the Final Preferred Alternative as part of its implementation strategy. The City will also develop a phasing plan to link any additional zoning capacity with infrastructure capacity.

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The targets will be used to plan for and to accommodate growth within each jurisdiction. The targets do not obligate a jurisdiction to guarantee that a given number of housing units will be built or jobs added during the planning period.

4 **Discussion:**
 The EIS is one tool for planning the transportation infrastructure needed in the Bel Red Corridor. The FEIS can and should provide for additional analysis of the transportation needs and City investment plans to allow the growth called for between now and 2030, as well as in intervening years.

FN-19: *All jurisdictions in the County, in cooperation with METRO, the Metropolitan Planning Organization, and the State, shall develop a balanced transportation system and coordinated financing strategies and land use plan which implement regional mobility and reinforce the County-wide vision. Vision 2020 Regional Growth Strategies shall be recognized as the framework for creating a regional system of Center linked by high-capacity transit and an interconnected system of freeway high-occupancy vehicle lanes, and supported by a transit system.*

5 **Discussion:**
 Starting with this EIS, the Bel-Red Corridor process should include a detailed analysis identifying transportation needs and how they will be financed in 5, 10, 15 and 25 years, to assure that the chosen land use plan can be implemented. This analysis should include evaluation of both local and regional improvements, particularly those planned improvements that are currently unfunded. As set forth below, GMA law requires that the funding sources for infrastructure needed in the next six years by clearly identified.

FN-23: *Each jurisdiction shall identify the facilities needed to ensure that services are provided consistent with the community's adopted service levels. Timelines for the construction of the needed facilities shall be identified*

6 **Discussion:**
 The DEIS does a good job of identifying transportation facility needs in 2030. The FEIS provides an opportunity to establish in greater detail the specific timelines for when any specific transportation improvements or facilities are needed in order to address the combined needs of the Bel-Red Corridor and other traffic generators, such as downtown Bellevue and the Redmond Overlake area. In the event improvements can not be provided at time increments or at adopted service levels, alternative policy options for achieving projected development densities should be evaluated and disclosed.

Wright Runstad & Co.-4

See response to Bellevue Chamber of Commerce-14. The Bel-Red Corridor Project anticipates considerable investment in transportation infrastructure to support existing and proposed development, as noted in the response to Wright Runstad & Co.-3. The FEIS analyzes the transportation system performance of the Preliminary Preferred Alternative in 2030; financing plans will be developed as part of the overall implementation strategy.

Wright Runstad & Co.-5

See response to Bellevue Chamber of Commerce-14. The FEIS analyzes the transportation system needs for the Preliminary Preferred Alternative. Specific finance planning for transportation infrastructure is accomplished outside of the EIS and would ultimately be approved by the City Council, as noted in the response to Wright Runstad & Co - 4.

Wright Runstad & Co.-6

As noted in response to Wright Runstad & Co.-3 through -5, a specific finance plan is accomplished outside of this programmatic EIS. The 6-year infrastructure concurrency requirement will be accomplished in a separate review process outside of the FEIS when specific land use is determined and specific transportation projects are selected and adopted into the *Transportation Facility Plan* and the *Capital Investment Plan*.

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City Comprehensive Plan Policies

The DEIS Land Use analysis also identifies selected Land Use policies (LU 7,13,15,23,33 and 34) in the City of Bellevue Comprehensive Plan at p. 7-11, and 7-12 which development of the Corridor will promote. We would add the following additional policies:

LU 4: *Encourage new residential development to achieve a substantial portion of the maximum density allowed on the net buildable acreage.*

Discussion:

7 The Bel-Red Corridor DEIS alternatives identify several “development nodes” where dense residential development is best situated. The WRC parcel, located close to downtown Bellevue and possibly on or very near a future Sound Transit HLT station, is an ideal site to promote the higher residential density called for in this CPP. In recent years the number of jobs in Bellevue and Redmond has dramatically increased, with further increases projected over the next 10-20 years. In order to minimize public infrastructure investments, traffic congestion and increased energy and pollutants associated with commuter travel, it is essential that all cities on the east side, especially Bellevue, identify and plan for appropriate sites to provide dense residential development. Sites such as the Bel-Red Corridor and the 36 acre Wright Runstad site in particular, provide excellent opportunities to site housing and office uses together, and thus promote the Steering Committee's core goals such as Sustainability.

LU 11: *Encourage master planning of large developments which emphasize aesthetics and community compatibility. Include circulation, landscaping, open space, storm drainage, utilities, and building location and design in the master plan.*

Discussion:

8 The WRC site is the largest consolidated parcel in the Bel-Red Corridor; as such, it presents the best opportunity for a phased master plan development. This will allow excellent design potential, coordinated uses, intelligent location of open spaces and efficient use of facilities.

LU 26: *Encourage new neighborhood retail and personal services to locate at appropriate locations where local economic demand, local citizen acceptance, and design solutions demonstrate compatibility with the neighborhood. The following concepts should be considered when determining compatibility:*

1. *Retail and personal services should be encouraged to group together within planned centers to allow ease of pedestrian movement.*
2. *A large proportion of a Neighborhood Business-zoned center should consist of neighborhood-scale retail and personal services.*

Responses

Wright Runstad & Co.-7

Comment acknowledged. All of the action alternatives evaluated in the DEIS, and the Preliminary Preferred Alternative evaluated in the FEIS, include mixed-use development nodes, and assume a significant amount of housing being added to the planning area.

Wright Runstad & Co.-8

Comment acknowledged.

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3. *The location of such retail/service activities within the neighborhood should encourage pedestrian patronage.*

Discussion:

9 The 36 acre WRC site provides the opportunity to plan for the neighborhood retail and personal services adjacent to residences, which reduces the need for automobile use, encourages walking and cycling and promotes a sense of community.

The following Transportation Policies from the City Plan are also:

TR-8: *Incorporate transit-supportive and pedestrian-friendly design features in new development through the development process. Examples include:*

1. *Orient the major building entries to the street and closer to transit stops;*
2. *Avoid constructing large surface parking area between the building frontage and the street;*
3. *Provide pedestrian pathways that minimize walking distances to activities and to transit stops;*
4. *Cluster major buildings within developments to improve pedestrian and transit access;*
5. *Provide weather protection such as covered walkways or arcades connection buildings in major developments, and covered waiting areas for transit and ridesharing;*
6. *Design for pedestrian safety, including providing adequate lighting and paved, hazard-free surfaces;*
7. *Provide bicycle connections and secure bicycle parking and storage convenient to major transit facilities;*
8. *Use design features to create an attractive, interesting pedestrian environment that will stimulate pedestrian use;*
9. *Design transit access into large developments, considering bus lanes, stops, and shelters as part of project design; and*
10. *Encourage the availability of restrooms for public use.*

Discussion:

10 The large WRC site provides the City of Bellevue with a unique opportunity to incorporate, as part of a future Master Development Plan, many of the pedestrian and transit features called for in this CPP.

TR-14: *Require new development to incorporate physical features designed to promote use of alternatives to single-occupant vehicles, such as:*

1. *Preferential parking for carpools and vanpools;*
2. *Special loading and unloading facilities for carpools and vanpools;*

Wright Runstad & Co.-9

Comment acknowledged.

Wright Runstad & Co.-10

Comment acknowledged.

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- 3. *Transit facilities, including comfortable bus stops and waiting areas; adequate turning room, and where appropriate, signal preemption and queue-jump lanes; and*
- 4. *Bicycle parking and related facilities.*

Discussion:

11 The proposed siting of a HCT station on 16th Avenue at the WRC Site will make it possible to incorporate many of these features as part of a Master Development Plan. The potential for design features that encourage HOV use, interim rubber tire transit service, and bicycle facilities is much greater in a Master Development Plan than in a set of isolated, non-integrated developments.

In addition to physical measures, a Master Development Planned project has even more significant programmatic potential through a Transportation Demand Management Program (TDM) to encourage non-SOV modes of travel. A coordinated program can provide periodic education and regular support services with a TDM Program Manager including ride-matching programs to encourage carpooling in vanpooling and transit subsidy programs to increase transit use.

TR-16: *Encourage private developers of adjacent or nearby properties to execute agreements to provide joint use and funding of shared parking facilities, with provision for pedestrian linkages.*

Discussion:

12 Efficient and shared use of parking facilities will be essential to any significant development called for in the Bel-Red Corridor. The concepts of TR-16 are being considered in WRC's early planning for its site and will be much more effectively accomplished considering the size of this parcel under a Master Development Plan.

TR-25: *Provide for adequate roadway, pedestrian, and bicycling connections in newly developing areas of the city, promoting both internal access and linkages with the rest of the city.*

Discussion:

13 WRC is working with City staff to identify how its 36 acre parcel can be designed in a manner that optimizes internal access and the linkages called for in TR-25.

TR-42: *Expand arterial capacities through construction for channelization improvements at intersections when they are an alternative to the construction of additional lanes along the entire roadway.*

Discussion:

14 The Bel-Red Corridor will, in future years, need additional transportation capacity to accommodate pass-through traffic and the growth called for under the

Wright Runstad & Co.-11

The DEIS identified several potential mitigation strategies, including incorporating aggressive transportation demand management (TDM) strategies to reduce single-occupant vehicle trips. These strategies will be important in the corridor overall, and the City agrees that a large Master Plan development project, as is contemplated by Wright Runstad, offers opportunities to incorporate TDM and other strategies to mitigate traffic impacts.

Wright Runstad & Co.-12

Comment acknowledged.

Wright Runstad & Co.-13

Comment acknowledged.

Wright Runstad & Co.-14

As noted in response to Wright Runstad & Co.- 4, this is a programmatic EIS that is analyzing the impacts of land use change to 2030. The FEIS will contain analysis of the transportation system needed to accommodate development in 2030. As noted in Wright Runstad & Co.-3 through -5, subsequent work as part of the overall implementation strategy will develop more information on the financing and phasing of development and infrastructure between now and 2030; this will all be part of the City Council's consideration of *Comprehensive Plan* changes.

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alternative which is selected. It is essential that the FEIS clearly identify where additional lanes and channelization improvements will be needed in 5, 10 and 25 years, as well as the City's related financing plan. As discussed below, GMA requires this analysis of needs and clearly identified public funding sources, for a minimum of six years, be conducted prior to a comprehensive plan amendment being adopted.

TR-44: *Design arterials and streets to fit the character of the areas through which they pass.*

Discussion:

- 15 The large WRC site presents the opportunity to design and create a coordinated urban village whose internal streets are entirely compatible with the look and character of the buildings and open spaces on this large site.

TR-57: *Coordinate with transit providers to enhance transit service information and provide incentives to encourage and facilitate transit use.*

Discussion:

- 16 The denser development called for under Alternative 3 will make it important that this policy be implemented. The WRC site will be planned from the outset to maximize opportunities to encourage transit use.

TR-70: *Promote transit use and achieve land use objectives through transit system planning that includes consideration of:*

1. Land uses that support transit, including missed use and night-time activities;
2. Transit oriented development opportunities with the private and public sectors;
3. A safe and accessible pedestrian environment, with restrictions on auto access;
4. Integrating multiple access modes, including buses, carpools and vanpools, bicycles and pedestrians;
5. Urban design and community character that support and facilitate transit use; and
6. Protecting nearby neighborhoods from undesirable impacts.

Discussion:

- 17 The EIS talks generally about the benefits of concentrating the proposed overall density into selected development nodes. The planned siting of light rail transit (LRT) lines and stations in the Corridor presents an opportunity to carry out transit-oriented development (TOD) in one or more areas of the Corridor. TOD calls for denser development around LRT stations to justify the public investment

Wright Runstad & Co.-15

Comment acknowledged.

Wright Runstad & Co.-16

Comment acknowledged.

Wright Runstad & Co.-17

Comment acknowledged. All of the action alternatives evaluated in the DEIS, and the Preliminary Preferred Alternative evaluated in the FEIS, contain areas of mixed-use development and densities to support prospective light-rail stations being evaluated as part of Sound Transit's environmental process.

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and promote efficient and sustainable travel patterns. The western end of the Corridor, located closest to downtown Bellevue and the widest area of the Corridor, provides outstanding opportunities to implement TOD. Sound Transit representatives testified at the SEPA Comment hearing on this opportunity.

The EIS also confirms the benefit of the City providing the public infrastructure needed to implement the selected alternative in advance in order to attract and achieve better quality of development.

Bel-Red Corridor Project Planning Principles

1. Long-Term Vision. *The preferred vision resulting from this project should be long-term, ambitious, and rooted in reality, providing clear direction for the future of the Bel-Red area. Lacking a clear vision, the area will likely continue to see piecemeal, uncoordinated change, and the loss of its full potential.*

18 **Discussion:**
 The Wright Runstad property presents an outstanding opportunity for the City of Bellevue to implement this long-term vision goal at the largest site in the entire Bel-Red Corridor. Wright Runstad is committed to proposing a phased and coordinated overall master plan proposal which comports to the greatest extent possible with this and other Bel-Red Corridor project planning principles.

3. Differentiated Economic Niche. *Bel-Red should provide for future growth of jobs and firms that have significant potential for expansion, and which are not well accommodated in other parts of the city. The area should enhance the city's overall economic health while creating land use forms and densities that are not likely to be found in other city employment centers, particularly Downtown Bellevue.*

19 **Discussion:** The development which ensues on the Wright Runstad property is likely to enhance the City's overall economic health through the creation of both jobs and close-in housing. The site, together with its future transit connections, is particularly well suited to an Urban Village-style sustainable project which currently does not exist on the same scale anywhere in the region. The Urban Village-style contemplated would blend building heights from 75 feet to 130 feet with well planned pedestrian and open spaces.

5. High Capacity Transit as an Opportunity. *This project should approach High-Capacity Transit as a significant opportunity to both enhance mobility and effect land use change. HCT can be a very significant development for Bel-Red, in that it can create entirely new transportation capacity and facilitate a series of land use changes. This project will determine the optimal route, number and location of HCT stations that realize these opportunities.*

Wright Runstad & Co.-18

Comment acknowledged.

Wright Runstad & Co.-19

Comment acknowledged. Allowable building heights have not been determined as of yet. The FEIS evaluates the potential impacts of building heights of up to 150 feet in the proposed development nodes (see response to Legacy-1). The steering committee will make a recommendation on allowable building heights in the corridor, which will then be considered by the Planning Commission and City Council as part of deliberations on potential Comprehensive Plan and land use code amendments in late 2007/early 2008.

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20 Discussion:
 As Sound Transit itself has attested to, the Bel-Red Corridor presents an excellent opportunity to promote the GMA concept of Transit-Oriented Development (TOD). The 800 to 1,000 residential units, when combined with the substantial number of office jobs proposed in the early Wright Runstad concepts, provides an optimal base to support a high capacity transit station and TOD. Single ownership of such a large site makes the likelihood of successfully developing TOD much higher at this site than is the case for anywhere in the entire Puget Sound Region.

9. Sustainability. *The vision for Bel-Red should identify opportunities to manage the area's natural resources in a sustainable manner. Building and development should be sensitive to issues of natural resource protection, energy and resource conservation, and transportation choices. In addition to the community benefits in enhanced quality of life, a more sustainable approach to development is increasingly helping to differentiate desired economic centers in the marketplace.*

21 Discussion: The project will demonstrate the economic and community benefits of a long-term commitment to reducing consumption of natural resources and impacts on the natural environment. We particularly encourage the City to adopt a set of incentives that provide for greater density with respect to the adoption of projects that are successful in:

- ▶ Leveraging its location and linkage to the central city, stressing the values and benefits of in-fill development.
- ▶ Creating a community responding to development patterns consistent with compact, urban settings by mixing uses and limiting (within reason based on market demand) single purpose facilities.
- ▶ Developing transportation and parking infrastructure using urban-oriented mode-splits leveraging the intended high capacity transit line and station within the project.
- ▶ Seeking to recycle as much of the existing building materials currently on site within the new project within economically feasible.
- ▶ Committing to only using green building materials and construction methods as recommended by the US Green Building Council.
- ▶ Encouraging all new buildings to be LEED certified.
- ▶ Developing integrated stormwater and open space systems.

Transportation, Chapter 10

22 The Bel-Red Corridor planning process and DEIS take place at a critical time. The BROTS Agreement is approaching a major review or reconciliation. The capacity left under the existing BROTS Agreement is limited, and both Bellevue and Redmond anticipate a significant number of jobs and housing coming to their cities in coming years. Thus, it is essential that documents such as the Bel-Red EIS take a careful look not just at the traffic impacts associated with the

Wright Runstad & Co.-20

See response to Wright Runstad & Co.-17.

Wright Runstad & Co.-21

To redevelop the Bel-Red Corridor in a sustainable manner is Bel-Red Corridor Planning Principle 9 adopted by the City Council. The vision for the Bel-Red Corridor, as expressed by the Steering Committee in the Preliminary Preferred Alternative is one that relies on collaboration between the private sector and the City to achieve greater sustainability in the way stream corridors and storm water are managed and how properties are redeveloped. Incentives are expected to be a significant component of the overall strategy to achieve greater sustainability in a land use pattern that promotes walking and transit use.

Wright Runstad & Co.-22

Comment acknowledged. Both Bellevue and Redmond are looking at land use plans that extend to 2030, well beyond the timeline for the current Bel-Red/Overlake Transportation Study (BROTS) agreement, which runs through 2012. Both Bellevue and Redmond are committed to working jointly, starting this year, to identify transportation projects and funding to mitigate the joint impacts of the two cities' respective planning efforts (see Coca-Cola Real Estate-1). It is now contemplated that work will begin this summer, after each City has identified a final preferred alternative, and continue into early 2008, at which time potentially both City Councils would be in a position to adopt an updated agreement.

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various Bel-Red alternatives, but also at the larger traffic impacts associated with projected growth in downtown Redmond, Redmond's Overlake area, downtown Bellevue and other developing areas on the east side. The DEIS correctly notes at p. 2-8 that "most of the study area's roadways are expected to be at or over capacity even without any changes in the Bel-Red Corridor, due in large part to anticipated growth in other areas such as Downtown Bellevue and Redmond's Overlake area. Hence improvements would be needed to many facilities to accommodate increased levels of development." This fact, plus the added Bel-Red impacts associated with any action alternative, demonstrates the importance of the BROTS process. Following issuance of the FEIS and a final decision by the Bellevue City Council on a selected alternative for the Bel-Red Corridor, negotiations will commence with the City of Redmond on a new BROTS Agreement. Those discussions must be based on a thorough evaluation of the combined transportation impacts and associated mitigation measures for development in the BROTS area in 2010, 2015, 2020, and beyond.

The FEIS presents the perfect opportunity to get that cumulative impact analysis of the BROTS area underway. Failure to use the FEIS for this purpose could well lead to extensive delay in the BROTS negotiations, as the analysis will be needed before meaningful decisions can be made. Under SEPA this cumulative impacts analysis is required independently for a thorough evaluation of the Bel-Red Corridor.

We suggest the City focus in its FEIS on three specific areas:

23

- 1) be sure that the Preferred Alternative selected by the Bel-Red Steering Committee is thoroughly evaluated;
- 2) be sure that a cumulative transportation analysis, as described in this comment letter, is conducted; and
- 3) go beyond the DEIS focus on 2030 needs and mitigation, and provide a detailed analysis of what the anticipated transportation needs and mitigation will be for 2010, 2015 and 2020 as well.

Scope of Transportation Analysis - The DEIS transportation analysis does a good job of analyzing impacts within the immediate area of the proposed rezone for the year 2030. It nonetheless, appears that adjacent neighborhoods in both the cities of Bellevue and Redmond may experience impacts that are not fully disclosed, particularly considering cumulative impacts (please see the following comment). Such disclosure in the FEIS is important to ensure the alternatives address the transportation implications related to:

24

- ▶ A successful BROTS Agreement;
- ▶ Transportation Concurrency compliance in both the cities of Bellevue and Redmond; and
- ▶ Impacts on local adjacent neighborhood streets.

Without this analysis and some accompanying specific mitigation strategy, it is possible that a private development application will fall short of currently adopted level of service and

Wright Runstad & Co.-23

See response to Coca Cola Real Estate-1. The environmental process for the Bel-Red Corridor is intended to evaluate the impacts of potential land use change, and accompanying transportation facilities, being contemplated by the City of Bellevue. Therefore, the DEIS analyzed different land use planning alternatives for Bel-Red, while assuming land use would occur based on currently adopted plans for outside the Bel-Red Corridor. The City of Redmond has not adopted any plans for updates to the Overlake Neighborhood Plan; therefore, it would be premature for the FEIS to evaluate the cumulative impacts of both cities' planning efforts. The State Environmental Policy Act (SEPA) analysis on BROTS and the *Transportation Facility Plan* will analyze and disclose in the information requested.

Wright Runstad & Co.-24

See responses to Wright Runstad & Co. -3, Wright Runstad & Co.-4, and Wright Runstad & Co.-23. The City acknowledges that more work is required to assess how much development can be approved in the short term, based on transportation capacity, and this will be developed as part of a phasing plan that will be part of the overall implementation strategy being developed for the Bel-Red Corridor.

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Transportation Concurrency standards, resulting in a Bel-Red Corridor plan that will not permit the actual development it is intended to accommodate. Since significant development will be needed as a catalyst for achieving the redevelopment of land use envisioned in the Bel-Red alternatives, it will be critical that these policy issues are addressed as part of this subarea planning process.

25 *Cumulative Impacts and FEIS* - We understand the City of Redmond anticipates major additional development in the Overlake area. It is not clear from the DEIS whether this additional development has been considered as part of background traffic in the cumulative impact analysis. If not, such a cumulative analysis should be performed in the FEIS and the effect of such a significant change in Redmond should be analyzed and, if necessary, mitigated by this component of additional development. If for no other reason, such analysis would help both the cities of Bellevue and Redmond in performing the analysis associated with any update of the BROTS Agreement and the City of Redmond with its planned update of Transportation Concurrency policies.

26 *Incremental Analysis and FEIS* - The DEIS analysis assumes major freeway improvements will be in place by 2030. While this may be adequate for analysis of ultimate development in 2030 in the rezone, it would be beneficial if some intermediate time horizons were analyzed to understand how phased development will be supported by these major infrastructure improvements. Without such an analysis, it is possible that any noticeable development will be delayed until these infrastructure improvements are in place. Thus, the FEIS should evaluate transportation impacts and identify needed mitigation measures for the timeframe of 2010, 2015 and 2020, as well as 2030. This analysis should also factor in anticipated traffic demands associated with projected growth in the Overlake area, downtown Bellevue and other dense urban areas which may generate trips on the arterials in the Bel-Red Corridor.

27 Finally, any transportation analysis in the FEIS should distinguish between future demand generated by the growth anticipated from any Bel-Red rezone, on the one hand, and traffic impacts associated with existing demand and future traffic demands in other parts of Bellevue and the surrounding areas. Given the extent to which the projected growth in these areas alone will necessitate improvements on most, if not all, major roadways in the Bel-Red Corridor (DEIS at P. 2-8), this is an important distinction to be made. Those who develop in the future in the Bel-Red Corridor must not be required to pay for improvements that are needed even if no additional Bel-Red development (beyond existing zoning) is allowed.

28 Likewise, it will be beneficial that a phased analysis of public transportation be considered recognizing that the LRT system may not be operational until midway through the analysis planning period.

29 Similarly, it may be beneficial to show the effect of changes in mode split should density be concentrated to levels greater than anticipated, particularly around the transit hubs.

30 Recognizing that it is impossible to examine every combination or permutation of the above outlined variables, it may be beneficial to perform a sensitivity analysis that would illustrate the

Wright Runstad & Co.-25

The DEIS assumed land use and transportation facilities in Redmond, based on currently adopted plans, in 2030. As noted in responses to Coca-Cola Real Estate-1, Wright Runstad & Co. -22, and Wright Runstad & Co. -23, there will be a separate process over the next year to assess joint development impacts, which will likely lead to an updated BROTS agreement. Any required SEPA analysis will be performed at that time.

Wright Runstad & Co.-26

See responses to WSDOT- 1 and -4 and Wright Runstad & Co. -3 and -4.

Wright Runstad & Co.-27

See response to Kemper Development-1. The DEIS evaluated a No-Action Alternative, which assumed minimal growth in Bel-Red, and action alternatives, which contemplated additional growth. One purpose of this was to assess the impact of action alternatives over and above the 2030 “baseline.” This will help enable the City to assess the requirements of development in Bel-Red over and above other background growth impacts. The City anticipates that both public investments and private developer contributions, as well as other strategies, will be needed to fund necessary infrastructure. Comment acknowledged.

Wright Runstad & Co.-28

See response to Kemper Development-10 and Bellevue Chamber of Commerce-14. The City will be working with King County-Metro to look at ways to add transit service to the Bel-Red area in advance of light-rail transit (LRT) being developed, and then also how local bus service can serve and support the regional transit system.

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effect of varied road capacity, transit capacity, and mode split characteristics. Based on these variables, peak hour trip generation and/or screen line volumes could be used as the index for disclosing the impact of subsets associated with each alternative.

- 31 Another approach that can be used in conjunction with the sequencing of road improvements is to modify the Level of Service policy for the Bel-Red subarea. Recognizing the changed character implied by the proposed rezoning, it is reasonable that a Level of Service standard reflective of a more urban condition be included as a policy recommendation in the FEIS.

- 32 **Capital Facilities Analysis** - The DEIS analysis clearly identifies planned road and transit improvements to address forecasted transportation impacts for 2030. The analysis assumes that these improvements will be in place by 2030. For this Bel-Red Subarea plan to be incorporated in the next Comprehensive Plan update, Growth Management Act requirements will mandate a Capital Facilities Element to identify the approximate cost and funding sources associated with these anticipated transportation improvements. Accordingly, the FEIS should include such a Capital Facilities Element so the Steering Committee can make an informed decision on the merits of each alternative. Further, it will be important for the City to understand the public sector contribution to funding of these transportation improvements.

- 33 We strongly support the City's vision to be a first-class city through investment in infrastructure using alternative financing options outside of the traditional federal and state transportation improvement grants. We encourage the FEIS consider inclusion of policy recommendations to identify alternative financing options, including economic development grants, bond financing of road improvements (using the increased revenues attributable to new development in the Bel-Red subarea), and other mechanisms.

This EIS is being prepared as an amendment to the City of Bellevue's adopted GMA Comprehensive Plan. As such, any amendment of a comprehensive plan must comply with all the requirements of GMA itself, Chapter 36.70A RCW. In this case, the DEIS indicates that it is being prepared as an integrated SEPA/GMA document pursuant to the authority in WAC 197-11-210 through WAC 197-11-235. DEIS at p. 1-3.

- 34 One of GMA's requirements is that the Capital Facilities Plan element of a comprehensive plan must in part include: 1) a forecast of future needs for capital facilities; and 2) contain at least a six-year plan that will fund such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes. RCW 36.70A.070(3). The purpose of requiring this capital facilities plan element is set forth in GMA's goals at RCW 36.70A.020(12):

(12) Public Facilities and Services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

As applied, these statutes and rules impose on the City of Bellevue as it adopts its Bel-Red Corridor amendment to its comprehensive plan the duty of: 1) specifying at the very least what

Wright Runstad & Co.-29

See response to City of Redmond-6. The DEIS assessed mode split overall for each alternative, and the FEIS includes this for the Preliminary Preferred Alternative. There may be opportunities within subareas of the planning area, particularly in designated development nodes, for a smaller percentage of single-occupant vehicles to be assumed. Additional information is provided in Appendix A.

Wright Runstad & Co.-30

For purposes of comparison, the FEIS is based on the same general assumptions about road and transit capacity as was the DEIS. As information changes, or as the plan is implemented over time, there may be changes to assumptions.

Wright Runstad & Co.-31

One option that could be considered is evaluation of a different level of service standard within the Bel-Red Corridor that perhaps better reflects a multimodal, mixed-use area. This will be evaluated in more detail as part of the overall implementation strategy.

Wright Runstad & Co.-32

The Bel-Red Corridor Project will result in proposed changes to land use designations and land use code in the study area. These changes will constitute the action to be taken by the Bellevue City Council pursuant to this SEPA review. Updating of the Capital Facilities Element of the *Comprehensive Plan* to reflect the new land uses and zoning will take place concurrently. The respective public- and private-sector contributions to transportation improvements will be determined as a component of the overall implementation finance strategy.

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transportation facilities and improvements are required in the next six years; and 2) specifying the cost of these improvements and clearly identifying the sources of public money to fund these costs. Absent this information in the FEIS or in other documents before the City Council prior to any amendment of the Comprehensive Plan, GMA's requirements may not be met.

35 Because the DEIS states it is an integrated SEPA/GMA document, hopefully the FEIS will contain the analysis required under RCW 36.70A.070(3). If this analysis is not in the FEIS, we understand the City will conduct this analysis in a separate effort outside of the EIS and prior to taking any action. While the DEIS does a good job of identifying longterm improvements required in the distant year of 2030 to accommodate the development anticipated at that point, the DEIS does not specify what, if any, additional transportation facilities or improvements will be required in the year 2012, six years from now. It also does not identify the cost of those transportation improvements needed in the Bel-Red vicinity to accommodate the additional development which would be permitted under whatever alternative is selected. The FEIS is an appropriate place to clarify what, if any, added improvements are required in the next six years, and at what cost and source of public funds. Not only is this important as a required element of GMA plans, but it is critical information for developers such as WRC who are considering implementation in the next six years of whatever development is allowed under the Bel-Red Corridor amendment to the Comprehensive Plan.

Conclusion

Thank you for the opportunity to participate in the SEPA process. Wright Runstad looks forward to working with City staff, the Bel-Red Steering Committee and the members of the public in the selection of a preferred alternative and subsequent implementation.

Responses**Wright Runstad & Co.-33**

Comment acknowledged. As part of the overall implementation strategy contemplated for the project, a variety of potential financing tools will be examined in more detail.

Wright Runstad & Co.-34

See response to comment Wright Runstad & Co.-3, Wright Runstad & Co.-4, and Wright Runstad & Co.-6.

Wright Runstad & Co.-35

See response to comment Wright Runstad & Co.-1, Wright Runstad & Co.-4, and Wright Runstad & Co.-6.

Comments

Responses

**WRIGHT
RUNSTAD
& COMPANY**

PRINCIPALS
E. JOHN H. RUNSTAD
WALTER R. INGLETT
GREGORY K. JOHNSON

ATTACHMENT TO WRIGHT RUNSTAD'S 3/12/07
SEPA LETTER

November 30, 2006

Mr. Michael Creighien
Mr. Terry Lukens
Co Chairs
Bel-Red Corridor Steering Committee
450 110th Avenue NE
PO Box 90012
Bellevue, WA 98009

**BEL-RED CORRIDOR PROJECT
INPUT REGARDING SAFEWAY SITE**

Dear Committee Members:

Wright Runstad & Company is thrilled to have the opportunity to undertake its seventh major development project in Bellevue over its 35 year history at the Safeway Distribution Center property located between 120th and 124th Avenues in the Bel-Red corridor. Together with our partner, Shorenstein Properties, we expect to close on the purchase of the 36 acre property in the first quarter of 2007, and operate the existing warehouses on site on an interim basis while we undertake the full redevelopment of the property.

We believe the Bel-Red corridor has enormous potential. Its location in the center of Bellevue, its access to the region's existing transportation network, and the prospect of future High Capacity Transit (HCT) through the corridor all combine to make it a logical candidate for the type of long range planning that the Bel-Red Steering Committee has undertaken. Wright Runstad & Company and Shorenstein Properties both have a long term perspective with respect to the redevelopment of the Safeway site and we were pleased to be invited to present our initial redevelopment ideas to the Steering Committee at its November 14th meeting.

As we stated at the meeting, we believe the economic potential of the Bel-Red corridor and the GMA principles of compact urban growth strongly support the development density specified in "Alternative 3" of the Bel-Red Corridor Study. This alternative indicates "Medium Density Office" in the location of the Safeway site which is intended to allow for up to FAR's of 2.0 and building heights of 75 feet. Given the access that the Safeway site enjoys to both present and future transportation we believe this level of office density is appropriate; however, modifications that would allow building heights to

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vary from 75 to 130 feet and a residential component consisting of 800-1000 units are appropriate on this site

Our initial redevelopment ideas are inspired by the Pearl District in Portland, Oregon. This is an area that also lies at the center of robust region, was influenced by the introduction of HCT and underwent the transition from light industrial uses. We believe that introduction of an urban style grid circulation system on the Safeway site with blocks that approximate the size of Portland city blocks will enable a pedestrian friendly environment and create an urban village atmosphere. We understand that, much like the Pearl District, light industrial uses such as the Coca Cola property would remain in close proximity to our project.

By having buildings on the site vary in height from 75 to 130 feet and placing parking largely underground, the development will take on a unique character and offer an attractive cityscape when viewed from afar. Keeping a fixed FAR and allowing building heights to vary will enable us to introduce open space in the form of two full block plazas of a type similar to that found in successful urban settings. With a variety of heights, nearly all of the buildings on the site will be able to benefit from stunning views of downtown Bellevue and the Cascades. This will also provide a showcase for successful transit-oriented development in the event Sound Transit opts to locate a station on the site or in the immediate vicinity.

Adding a component of residential development on the site of somewhere between 800 and 1000 units will be important to both giving the development an urban character with a 24/7 energy and capitalizing the entire site's adjacency to future HCT. As the Safeway site is redeveloped, its population of residents and office workers will give rise to a terrific service retail component of restaurants and shops in the area making the entire Bel-Red Corridor an even more attractive place to live and work.

Sound GMA, urban and regional planning principles support the alignment of future HCT down the center of the corridor. Sound Transit's EIS evaluation and ultimate adoption of Alternative D2E alignment will enable the full potential of the Bel-Red Corridor to be realized. Furthermore, the introduction of a HCT station at the Safeway site would enable a terrific transit oriented development and fully support smart growth in our region.

Comments

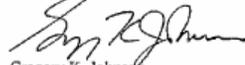
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In summary, we submit the following recommendations to the Bel-Red Steering Committee for its consideration:

1. That the Committee recommend Alternative 3 as the preferred alternative and further recommend the following:
 - a. That the Medium Office Density designation on the Safeway site be defined to allow an FAR of two.
 - b. Modify the Medium Office Density designation on the Safeway site to incorporate flexibility to introduce an additional residential component of 800 to 1000 housing units.
 - c. Modify the Medium Office Density designation to allow for maximum building heights on the Safeway site to vary between 75 and 130 feet.
2. That the Committee urge the City of Bellevue to adopt the D2E Alternative for the ST East Link as its preferred alternative and further recommend that a station be located at the Safeway site in a new 16th Street alignment.
3. That the Committee urge the City of Bellevue planning staff to look in the Bel-Red Corridor Final EIS at any significant environmental impacts and related mitigation associated with the changes we are recommending to Alternative 3.
4. That the Committee also explore a concept for this portion of the Bel-Red subarea which would both allow office and residential uses on the Safeway site and preserve a Light Industrial designation for the Coca Cola site. This concept might be incorporated as part of Alternative 3, or viewed as a separate Alternative.

We look forward to working with the Committee as it completes its vision for the Bel-Red corridor. We will plan to attend the Committee's December 7th meeting and answer any questions you may have regarding the above recommendations or the future use of the Safeway site.

Sincerely,



Gregory K. Johnson
 President

Responses

Comments

Helland, Carol

From: Stacie LeBlanc [stacie.leblanc@clearwire.net]
Date: Monday, March 12, 2007 4:01 PM
To: Helland, Carol
Subject: DEIS Bel-Red

I will be sending more comments.

Stacie

March 10, 2007 Subject: Comments on the DEIS for the Bel-Red Corridor Study

It appears that Sound Transit's desires to provide High Capacity Transit (HCT) in the form of light rail (LR) rather than Bus Rapid Transit, or BRT, is driving future land use changes, rezoning, densification, probable business and property condemnations, and negative neighborhood impacts in the Bel-Red corridor of the City of Bellevue.

- 1 City staff and Council members have admitted at Council meetings that Sound Transit wanted to locate the light rail corridor in the middle of the Bel-Red Sub-area (between SR 520 and the Bellevue Redmond Road) so that it could be rezoned and the subsequent densification could more fully support Sound Transit's ridership desires. In other words, ST would not be interested in locating light rail on 520 because they feared they wouldn't achieve the ridership.

This action to run the light rail corridor down the center of the Bel-Red Sub-Area would begin the process of property condemnations and silver takings that I sought to avoid by submitting a Comprehensive Plan Amendment to the City of Bellevue on January 31, 2006, which states:
 Suggestion for a non site-specific Comprehensive Plan Amendment:

Block 2: Proposed Amendment Language.

- 2 "As befitting its role as a regional and national leader, the City of Bellevue will protect the property rights of its citizens by adopting a policy whereby the City of Bellevue will not take or condemn private property owned by one citizen (or group) in order to transfer it to another citizen (or group) for tax creation or redevelopment purposes".

The council did not opt to act on this proposed language change to protect Bellevue property owners.

While both the City of Bellevue and Sound Transit have the power of eminent domain, it is my fervent hope that the City of Bellevue and Sound Transit will not engage in condemnations or silver takings of private property in the Bel-Red corridor, facilitated by sweeping land use changes brought on by Sound Transit, in order to redevelop certain portions of the Bel-Red corridor by taking property from one owner to give it to another for tax creation purposes.

Responses

Stacie LeBlanc-1

Bel-Red Corridor Planning Principle 5 provides direction to take advantage of the opportunities that light-rail transit (LRT; light rail is the technology adopted by the Sound Transit board) would bring to the Bel-Red Corridor. The Preliminary Preferred Alternative includes an alignment and station locations that the Steering Committee believes incorporates the Council's direction.

Stacie LeBlanc-2

Specific property acquisition for right-of way and cost estimates for infrastructure construction are not components of this programmatic EIS - these are being developed separately from the EIS process and will be considered by the City Council as part of Bel-Red implementation strategies.

Comments

Responses



March 12, 2007

Carol Helland
Bellevue Department of Planning & Community Development
City of Bellevue
P.O. Box 90012
Bellevue, WA 98009-9012

RE: Bel-Red Corridor Draft EIS Input

Dear Ms. Helland:

We appreciate the effort made in the Bel-Red Corridor study to strike a balance between available land and the pursuit of future economic and housing opportunities for our community. Two years ago, the Bellevue Downtown Association (BDA) criticized the expenditure of \$1 million for this effort. At the time, major planned downtown infrastructure priorities were unfunded just as nearly 30 downtown office and residential projects entered the construction pipeline.

While most of these downtown infrastructure priorities remain unfunded or under funded, and without a clear timeframe as to when they will be constructed, some progress has been made in the recently adopted CIP and Supplemental CIP budgets. As we continue to press and work with the City to fund and implement these downtown infrastructure projects, we also recognize that there are potential benefits from the employment and housing growth corridor that may result from the land-use alternatives under review. Recently, PCD staff members briefed the BDA Land Use Forum on the Draft EIS and the BDA Board of Directors has reviewed the alternatives. On behalf of the BDA, we respectfully submit the following comments.

1 **Downtown Plan implementation must precede new major redevelopment in the Bel-Red Corridor.** The BDA would support zoning and land-use changes in the Bel-Red Corridor only if preceded by a defined City funding and implementation strategy for the major infrastructure priorities in the 2003 Downtown Implementation Plan (DIP). Furthermore, local and regional road improvements in and near Downtown Bellevue (consistent with the traffic modeling in the 2030 Bel-Red alternatives) must be in place prior to – and as a condition for the BDA supporting – any permitting of significant redevelopment in the Bel-Red Corridor.

2 **A capital funding strategy and commitment should accompany a Bel-Red Corridor implementation plan.** Based on our experience in advocating for DIP funding more than three years after the DIP was adopted, the BDA very strongly urges the City to identify a capital funding strategy for public infrastructure in the Bel-Red Corridor as part of this plan's development – before new growth takes root. This approach will give stakeholders a clearer understanding of funding impacts and the timing of improvements.

Making A Great Place Together

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 STEVE SHERIDAN
 CITY OF BELLEVUE
 *Executive Committee

Bellevue Downtown Assoc-1

Comment noted. See response to Bellevue Chamber of Commerce-14.

Bellevue Downtown Assoc-2

Comment acknowledged. As noted in response to Wright Runstad & Co.- 33 and Bellevue Chamber of Commerce-13, a detailed financing plan will be part of the overall implementation strategy for Bel-Red.

Comments

Responses

Bel-Red Corridor Input, page 2

3 **Among the current alternatives, the BDA would favor scenarios with the highest concentrations (5,000) of new housing units.** Housing options are in high demand in our City, and we agree with the strategy to increase housing densities near potential transit nodes. We know that moving people and goods through the corridor will call for a carefully balanced plan of new general capacity and transit improvements. While the EIS assumes light rail as an option by 2030 in the corridor, future planning efforts should also account for a future without light rail. In general, we believe planning efforts should focus on a cohesive mix of commercial, residential and transit options in emerging neighborhoods, with a long-term goal of limiting the number of car trips out of the Bel-Red Corridor.

4 **Allow for general mixed-used zoning; retain light industrial uses.** Regarding employment growth and commercial uses, the land use designations in Alternatives 1, 2 and 3 of the Draft EIS appear overly prescriptive in the current mapped form. The BDA would support general mixed-use zoning to allow for more flexibility in development proposals. Zoning changes alone should not push viable existing businesses out of the City. We believe the best alternative may be to retain a light industrial zone for businesses that continue to serve the community and have no other place to move to in the City. Flexibility and incentives rather than prescriptive constraints either with respect to uses or heights should be the approach taken with the new zoning and land-use regulations.

5 Further, we would encourage the City to allow existing businesses to continue without the burdensome rules that attach to non-conforming use status. Zoning categories should avoid labeling these uses "non-conforming," so that long-standing enterprises can obtain financing, expand or alter, or make other decisions as needed to succeed. New plans should not drive out businesses that have made long term investments in this corridor.

6 **We are requesting a report, based on the study's growth alternatives, of impacts to 2020 land use targets citywide and for downtown.** The 2030 planning horizon used in the Draft EIS raises the issue of how major land-use and zoning changes in the Bel-Red Corridor will change the percentages of housing and employment growth to be absorbed citywide and in downtown, an area planned on a 2020 horizon. The City should provide this analysis concurrently with further work on the EIS.

The BDA welcomes the value of a solid strategy and shared vision to guide growth and seize new economic and housing opportunities in the Bel-Red Corridor. In general, we commend the steering committee's work and the planning principles approved by the City Council and exercised in the Draft EIS. While we remain focused on downtown priorities and expect the City to fund and implement the DIP priorities, we recognize the importance of coordinated planning and collaboration in connection with the Bel-Red Corridor.

Sincerely,



Warren Koons, BDA Board Chair



Leslie Lloyd, BDA President

cc: BDA Board of Directors

Bellevue Downtown Assoc-3

See response to Kemper Development-10. The Preliminary Preferred Alternative includes a development program that assumes 4 million square feet of commercial development and 5,000 housing units in the corridor by 2030. Much of the new development is assumed to occur in development nodes that may be served by a future light-rail line, yet the development pattern is also viable in the absence of light rail.

Bellevue Downtown Assoc-4

See response to Bridle Trails Community Club-8. The Preliminary Preferred Alternative provides for mixed use development that would be concentrated in nodes and provide flexibility for existing uses to remain in the area, and to expand if desired.

Bellevue Downtown Assoc-5

See response to Bridle Trails Community Club-8.

Bellevue Downtown Assoc-6

The 2001 to 2022 period targets for housing and employment will not be changed based on the outcome of the Bel-Red Corridor planning process. As noted in the DEIS, if changes are made to land use planning and zoning in the Bel-Red Corridor, these would be considered during the next round of countywide target allocations, which will be for the 2012 to 2032 period. At the same time, land use and zoning changes in the Bel-Red Corridor would affect the amount of new housing and employment to locate in the corridor, and by implication also affect the percentage of the City's housing and employment growth that would occur in Downtown. The Bellevue City Council also adopted a set of 10 planning principles that reflect the project goals while providing more specific direction for corridor planning. Bel-Red Corridor

Comments**Responses**

Planning Principle 3 indicates that Bel-Red should provide for an economic niche differentiated from that in other city employment centers, including Downtown Bellevue. That Bel-Red should serve a distinctive market niche was also one of the objectives (listed under Market Feasibility) that the Steering Committee approved based on the project planning principles. These objectives helped guide the Steering Committee's evaluation of the Bel-Red Corridor Project alternatives.

Comments

Responses

O'Neill, Kevin

From: tdrewenskus@qwest.net
Date: Monday, March 12, 2007 11:08 PM
To: BelRed
Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 11:07:36 PM

City: Bellevue
 Name: Thomas Drewenskus
 Address: 1001 106th Ave SE
 Mailing List: Yes

Comments: To Whom It May Concern,
 With regards to the Bel-Red Corridor Project, I believe additional funding needs to be provided for grass playfields. I have been a soccer coach in West Bellevue for ten years. I also do the Fall game scheduling for 435+ recreational soccer teams on the Eastside each year. In addition, I am the referee coordinator for the Bellevue Youth Soccer Club (BYSC), as well as a referee. I am currently on the board of directors of three soccer organizations (BYSC, Eastside Youth Soccer Association, and Bellevue High School Boys Soccer Booster Club).

The condition of the soccer fields in West Bellevue have steadily declined each and every year. No new fields have been made available to the BYSC since we were given partial use of the outfield grass on Hidden Valley baseball field #3 in 2004. Every year we are seeing additional impact on the soccer fields by the ever-popular and growing Bellevue Junior Football and Bellevue Lacrosse programs. These programs refuse to use the all-weather dirt fields for practice, and instead practice on the only two grass fields available (Upper Chinook MS and Surrey Downs). The impact of football and lacrosse practices has made these grass fields nearly unplayable. So, at present we do not have a safe grass field on which to practice or play soccer. The fields have gotten so bad that one of my players sprained his ankle in one of the Upper Chinook potholes and he missed four weeks of our Fall season soccer games.

BYSC has asked the Bellevue Parks Dept and Bellevue School District to allow us to maintain these fields. But, we are told that we cannot fill in the potholes, because we would not be using the same kind of soil. We are also told that we cannot plant grass in the bare spots (~15% of the field), because we would not be growing the same type of grass. We also not allowed to shut down the Upper Chinook MS field for maintenance, since it is on school property.

As a recreational soccer club serving 850 kids in West Bellevue, BYSC is at a loss as to how to arrive at even one decent grass soccer field within our boundaries. West Bellevue does not want to be known for having the worst soccer fields on the Eastside. We are hoping the Bel-Red Corridor Project will consider funding for additional grass playfields in West Bellevue.

Thanks for your consideration.

Thomas L. Drewenskus
 425-646-4535 home
 425-269-0551 cell
 State: WA
 Zip: 98004

Thomas Drewenskus-1

Comment acknowledged. The Preliminary Preferred Alternative includes several proposed park sites that could accommodate active recreation, including soccer fields.

Thomas Drewenskus-2

Comment noted.

Thomas Drewenskus-3

Comment noted. Funding for specific elements of the Preliminary Preferred Alternative are not part of the EIS, but will be considered separately by the City Council as part of the Bel-Red implementation strategy.

Comments**O'Neill, Kevin**

From: drc1dawg@msn.com
To: Monday, March 12, 2007 10:31 PM
Subject: BelRed
 Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 10:30:45 PM

City: Bellevue
 Name: Devon Campbell
 Address: 11014 NE 18th Place
 Mailing List: Yes

Comments: I support creating new active recreational parks and ballfields in the Bel-Red area, and believe this is needed for all of the alternatives. Growth throughout the City, including in Bel-Red and downtown, is increasing the cumulative need for parks.

Especially when downtown's recent growth has not created any new parks dedicated to family use. Please consider the combined demand from downtown and the Bel-Red area to determine what is needed for parks and recreation features.

State: wa
 Zip: 98004

Responses**Devon Campbell-1**

See response to Drewenskus-1. While demand for park and recreation facilities has been projected mainly for the impacts of the Bel-Red Corridor growth, several park sites proposed in the Preliminary Preferred Alternative will be able to accommodate communitywide use.

Comments

O'Neill, Kevin

From: fujinagas@msn.com
t: Monday, March 12, 2007 10:03 PM
... BelRed
Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 10:02:59 PM

City: Clyde Hill
Name: Terri Fujinaga
Address: 9529 NE 31st
Mailing List: No
Comments: Hello,

1 I have two young children and would greatly appreciate your commitment to looking at park and field usage and demand in the Bellevue and in particular the West Bellevue areas. Thank you for your consideration.

Warm Regards,
Terri Fujinaga
State: WA
Zip: 98004

Responses

Terry Fujinaga-1

See response to Thomas Drewenskus-1. Park and field usage demand has been considered when developing the alternatives for the DEIS, and several of the park sites included in the Preliminary Preferred Alternative could accommodate sports fields.

Comments

Responses

Beth Swanson-1

See response to Drewenskus-1 and Campbell-1.

O'Neill, Kevin

From: bethkswanson@hotmail.com
To: Monday, March 12, 2007 9:45 PM
Subject: BelRed
Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 9:45:03 PM

City:
Name:
Address:
Mailing List: No

Comments: I support creating new active recreational parks and ballfields in the Bel-Red area, and believe this is needed for all of the alternatives. Please consider the combined demand from downtown and the Bel-Red area to determine what is needed for our city's children to run and play. We're Bellevue natives and citizens w/ 4 kids in Bellevue schools who all play sports; its not uncommon now for us to travel to Redmond or Kirkland to find practice fields for our kids' teams. More multifamilies by the thousands... where will these kids play? Thanks for your consideration, Kris and Beth Swanson

State:
Zip:

Comments

Responses

Melissa Campbell-1

See response to Drewenskus-1.

O'Neill, Kevin

From: keedmane@hotmail.com
t: Monday, March 12, 2007 8:56 PM
Subject: Bel-Red
Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 8:56:22 PM

State: wa
City: Bellevue
Name: Melissa Campbell
Address: 11034 NE 18th Place

Comments: There is a shortage of sports fields in West Bellevue. With the population in West Bellevue increasing, there are not enough sports fields to accomodate youth and adult sports programs. We are already over crowded. Please consider having atleast 1 outdoor multit use field like Grass Lawn park in Redmond or like the fields that are on the Microsoft campuses.
Zip: 98004

Comments**O'Neill, Kevin**

From: dwalton44@yahoo.com
 t: Monday, March 12, 2007 7:22 PM
 BelRed
 Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 7:22:07 PM

City: Bellevue
 Name: Dan Walton
 Address: 190 94th ave ne
 Mailing List: Yes

Comments: More parks and rec areas need to be priotized along with the development plans, otherwise we will have the issues Seattle and other major cities now face. Get smart and take care of the kids and citizens with green areas and places to enjoy. The growth will continue, make sure it is enjoyable and worthwhile for all.

Regards,

Dan Walton
 State: WA
 Zip: 98004

Responses**Dan Walton-1**

The provision of park and open space areas have been a priority throughout the Bel-Red Corridor planning study. Green spaces included in the Preliminary Preferred Alternative include neighborhood and community parks, trail connections, a green boulevard along NE 16th Street, and open space buffers along the riparian corridors.

Comments

Responses

O'Neill, Kevin

From: Todd Woosley [todd@woosleyproperties.com]
Date: Monday, March 12, 2007 9:59 AM
Subject: BelRed
Cc: Rod Kaufman; Bruce Nurse; Bill Eager; LLC Nickols Realty; T.J. Woosley; Dean W. Rebhuhn; Shannon Boldizsar; Marian Woosley
Subject: BelRed DEIS Comments
Attachments: DEIS Comment Letter



DEIS Comment
Letter (53 KB)

Dear City of Bellevue,

Attached is the comment letter from Hal Woosley Properties, Inc. regarding the Bel-Red Corridor Draft Environmental Impact Statement. As long time business and commercial property owners in the Bel-Red Corridor, we trust that our forty years of experience, perspective and expertise in Bel-Red land use issues will be seriously considered by the City of Bellevue.

In addition, my family and I look forward to working with the City to ensure the future of Bellevue's largest commercial area successfully redevelops consistent with a new vision, while the current businesses' and properties' economic viability are protected and enhanced.

Sincerely,

Todd R. Woosley
Hal Woosley Properties, Inc.
12001 N.E. 12th Street, Suite #44
Bellevue, WA 98005
(425) 455-5730 #3

Comments

Responses

**Todd R. Woosley
Hal Woosley Properties, Inc.
12001 N.E. 12th Street, Suite #44
Bellevue, Washington 98005
(425) 455-5730 #3**

Todd Woosley-1a

See response to Bridle Trails Community Club-2 and -3, and Bellevue Chamber of Commerce-7. The City Council appointed Steering Committee members at the beginning of the Bel-Red Corridor Project in October 2005. The process is now near its conclusion, and new steering committee members will not be added. During the course of the project, considerable effort was made to involve the owners of businesses and properties in the Bel-Red Corridor, and the Steering Committee considered their input in the development of the alternatives analyzed in the DEIS and in the Preliminary Preferred Alternative.

March 11, 2007

Ms. Carol V. Helland
Environmental Coordinator
City of Bellevue
P.O. Box 90012
Bellevue, WA 90012

Re: Bel-Red Corridor Study Draft Environmental Impact Statement Comments

Dear Ms. Helland,

Thank you for the opportunity to comment on the Bel-Red Corridor Draft Environmental Impact Study (DEIS). On behalf of my family, and Hal Woosley Properties, Inc., we compliment the process the City of Bellevue is using to help shape the future of Bellevue's largest commercial area. We also understand that the most important work is yet to be done.

Therefore, please accept these comments on the DEIS as part of our ongoing contribution to further refining and improving the study of the Bel-Red Corridor. Our forty continuous years of commercial property ownership, management and development experience in the area help provide the expertise on which the following comments are based.

PROCESS:

We believe the overall process has been well done with the notable exception that both property owners and business representatives (owners and/or managers) were deliberately excluded from the Steering Committee.

We strongly urge that three additional positions be added to the Steering Committee from this point forward. These positions should consist of one for a property owner, one for a business owner and one for a business manager. These new positions should be seated as soon as possible.

In addition, there are some concerns about the accuracy, and lack of detail, of information in the DEIS. Specific issues are addressed in the remaining comments.

Comments

TRANSPORTATION/ECONOMIC FEASIBILITY:

2 Traffic congestion is the biggest threat to the Bel-Red Corridor's viability. It is imperative that accurate analysis and assumptions be used in assessing current and future transportation use and systems. Maintaining current Levels Of Service (LOS) in the Bel-Red Corridor and its surrounding areas will allow for targeted redevelopment to occur, existing businesses to remain economically viable and limit citizen opposition to the Corridor's planned growth. As the Planning Principles Long-Term Vision states, "the preferred vision should be... rooted in reality."

Unfortunately, the DEIS and related documents provide some inaccurate information regarding transportation. In addition, detailed information about traffic impacts, mode splits, corridor planning, infrastructure and property acquisition costs is not included.

3 The inaccurate information includes the CH2M Hill "Land Use: Right of Way Acquisition" assessment about the number of properties that would be impacted by new or expanded infrastructure. One example is the statement that the proposed extension of N.E. 10th Street to 124th Avenue N.E. would only impact "up to 2 retail buildings, portions of an auto dealership, and two warehouses." This grossly understates the number of properties that would be impacted between 116th Avenue N.E. and 124th Avenue N.E. Review of the King County tax parcel maps shows that approximately eighteen buildings (not five) would be impacted. The DEIS needs to include an accurate assessment of all the properties that would be impacted by every proposed transportation improvement.

4 Furthermore, the cost of this and other right of way acquisition must be considered. For your information, the assessed value of the eighteen buildings referenced above is over sixty two million dollars. The market value is likely ten to twenty percent higher. Even at sixty two million dollars, this is similar to Bellevue's entire Capital Improvement Budget.

Another apparent inaccuracy are statements in the DEIS that claim or imply high capacity transit (e.g. light rail), and related stations, creates significant demand for new development. This is counter to the information provided in the Leland Economic Study. It also defies in-depth market demand analysis data identifying economic demand factors for real estate development in any of the densities being considered for the Corridor. Therefore, such statements should be removed from the document. Also, the point made in the Leland study that higher density developments don't need high capacity transit to be feasible should be emphasized. The more influential demand factors should be explained. Finally, it should be made clear that it is transit that benefits from the anticipated higher density development (not the other way around) because the higher densities provide some increase in transit ridership.

True market demand factors for redevelopment should be added to the analysis. These should include enough macro and micro economic demand information for future demand patterns to strongly focus the City's selection of a preferred alternative.

Responses

Todd Woosley-2a

See response to Wright Runstad & Co.-31. Transportation system modeling assumed the current level of service standard and embedded in the model are assumptions regarding mode split. Modeling identified intersection level of service changes between the current (2005) levels and the 2030 planning horizon, assuming land use changes and infrastructure improvements identified in the Preliminary Preferred Alternative. Specific property acquisition for right-of way and cost estimates for infrastructure construction are not components of this programmatic EIS – these are being developed separately from the EIS process and will be considered by the City Council as part of Bel-Red implementation strategies.

Todd Woosley-3a

See response to Coca Cola Bottling-4a. The Bel-Red Corridor EIS is a programmatic assessment of the impacts that could occur as a result of the proposed land use changes and transportation improvements. At this early stage of planning, design details of specific transportation projects that could be implemented have not yet been developed. As such, the DEIS described only the number of parcels that might be impacted by these projects, not the number of buildings or the specific tenants of those buildings. If projects are implemented in the future, detailed design would seek to minimize right-of-way acquisition and residential or business displacements.

Todd Woosley-4a

See response to Todd Woosley-3a. Accurate assessment of right-of-way costs is not feasible at this conceptual stage of design.

Comments

Responses

Equally important, missing information that should be provided includes details about current and future transportation demand patterns and mode splits, as well as the assumptions utilized in the analysis.

The following information is necessary for the public to evaluate the transportation information currently provided by the City:

- Current mode split of actual pedestrian, bicycle, single occupant vehicles, carpools, vanpools and bus service. Individual percentages and actual numbers of these patterns for both a full day and evening PM Peak Commute time are needed. The three hour “peak” is not acceptable, nor is the use of AM. This information should be separated for travel within the Corridor study area, as well as for surrounding areas.
- Future projected information about all of the above should also be provided.
- A comparison between Bus Rapid Transit and Light Rail ridership (including cost per passenger, total actual current and projected ridership, and timing of when the service would be available) should be made available.
- A complete analysis of all properties that would be impacted by transportation right of way acquisition should be made available.
- A comparative analysis and summary of the LOS benefits of each proposed transportation improvement (including cost/benefit information) should be made available.
- A listing of the major assumptions in the City’s traffic model (e.g. any additional capacity on SR 520) should be made available.

The emphasis on light rail is disproportionate. Each transportation mode should be portrayed objectively. The “Transportation: Mode Share” chart shows projected SOV travel will remain the most dominant mode, by far. SOV travel, according to the chart, will consist of between 75% and 87% of total trips. The DEIS under-emphasizes this basic fact and should recognize this demand pattern in proportion to its relative use.

LAND USE:

The Bel-Red Corridor Study effort will lead to changes in future land use in the Bel-Red Corridor. The current realities of existing development need more detailed assessment. A significant portion of the study area contains land use restrictions that cause existing buildings to under-perform. Current zoning is very restrictive, allowing only a limited number of permitted uses to locate in the area. The root causes of building vacancies, unusual tenant mixes, deferred property maintenance and business obsolescence should be analyzed. This would provide a foundation to meet the Planning Principles Economic Vitality goal of “enhancing the area’s existing strengths...”

Most importantly, the DEIS fails to identify the specific businesses that would be made “legal non-conforming uses” if and when zoning changes under each alternative would be implemented. Every business that would have its permitted use zoning diminished or removed should be identified by the City, and notified of this potential.

Todd Woosley-5a

See response to Legacy-2. There are many factors that create a market for new development, many of them driven by overall economics. However, light-rail transit (LRT) can help, along with other factors, create a market for future development by ensuring that fixed, high-frequency transit service is available to a location, thereby providing a transportation option that is not impacted by congestion. Case studies from all over the United States have demonstrated that communities, when applying effective planning and economic development strategies, have been successful at working with the development community on focusing new development near LRT. The Leland report recommends that the City of Bellevue incorporate this as part of the overall strategy for the corridor. However, as noted, many other factors need to be in place for new development to be successful as well, including general purpose transportation capacity.

Todd Woosley-6a

Mode split information was provided on page 10-24 of the DEIS. These data are only available for the a.m. peak hour, as the model used to develop transit forecasts is only available for the a.m. peak hour when the mode choice is made by most peak hour travelers. The mode choice data provided on page 10-24 are a future projection. A comparison of Bus Rapid Transit (BRT) versus LRT is not appropriate for this EIS because the proposed action for this EIS is not whether BRT or LRT should be constructed. The action on which this EIS is based is described on page XVII of the DEIS, which states that LRT is assumed for all alternatives. In addition, the choice of which transit technology to use in the Bel-Red Corridor is a decision made by the Sound Transit Board. The City of Bellevue can have an influence the decision based on studies and input.

Comments

Responses

- MAKING EXISTING BUSINESSES NON-CONFORMING TO CHANGED ZONING CODES IS THE BIGGEST THREAT TO THE ECONOMIC VITALITY OF THE BEL-RED CORRIDOR.
- 9 The Study should identify methods to protect the economic viability of existing businesses and properties. Any economic impacts from zoning changes need to be assessed. The Study needs to recognize that, due to the very long-term time frame being considered, the need to allow existing businesses to remain as outright permitted uses is critical.
- 10 There is an additional opportunity for the City to meet the first four Planning Principles. This is to utilize a method of zoning that protects existing economic vitality, provides the performance criteria and impact protections the City desires, and creates the greatest opportunity for the future vision to become reality. This is Flexible Use Zoning.
- 10 We urge the City to consider changing from Permitted Use Zoning to Flexible Use Zoning in the Bel-Red Corridor. By explicitly identifying the performance criteria allowed for land uses, the City would create the most flexible, market-oriented zoning available for the corridor. As businesses evolve, and new business types are created, having a Flexible Use zoning code would remove unnecessary obstacles for economic development. In addition, both the City and the private sector would have more clear understanding of the performance criteria (e.g. traffic and noise impacts) expected of any land use.
- 11 The Study also needs more information about the basic economics of re-development. Too many of the proposed zoning categories and/or districts in any alternative appear unfeasible.
- 11 The general rule of thumb that a five-fold increase in density is necessary for a property to be redeveloped needs to be considered, as should more detailed specifics of redevelopment economics. Current definitions call for unfeasibly small increases in FARs, building heights and densities. A reconciliation between the DEIS and the Economic Analysis should be performed. Any proposed zoning definition that makes redevelopment inherently unfeasible should be identified, and changed to make redevelopment more feasible.
- 12 Another issue that needs to be assessed is the need to phase the rezoning, and subsequent redevelopment of the Bel-Red Corridor to match infrastructure development and concurrency capacity.
- 13 Finally, we believe the Study should address some apparent inequities in proposed rezones. Specifically, three of the four Alternatives leave the Wilburton General Commercial district zoned the same as it has been since Bellevue imposed zoning on the Bel-Red area. At the same time, the Safeway light industrial property area is slated for significant upzoning. This appears to be akin to spot-zoning, which is illegal. Allowing similar increases in development capacity, and flexibility of uses, would be much more fair. In addition, this should be thoroughly analyzed to help make the western portion of

At the time of analysis and publication, Sound Transit had made the preliminary recommendation that LRT would be the preferred technology for high-capacity transit through the corridor. In addition, an analysis of all properties impacted by acquiring right-of-way is not appropriate at this programmatic EIS level, given the uncertainty of the exact transportation improvement alignment. Detailed right-of-way and property analysis will be made at the design level for each transportation project.

A comparative analysis of level of service (LOS) benefits and impacts is reported in Table 10-11, which summarizes for each alternative the impact of added and/or improved delay in the study area through vehicle hours of travel and average speed. Both of these calculations take into account the LOS at study intersections.

A benefit/cost analysis was not conducted due to the uncertainty of several factors needed to calculate both benefits and costs, including transportation project alignments and timing of transportation projects. Major transportation infrastructure assumptions contained in the model were listed on page 10-1 (including SR 520), as well as other transportation assumptions in the Methodology section of the DEIS from pages 10-1 to 10-6. While it is acknowledged that there is considerable emphasis on the LRT mode in the DEIS, the emphasis was intentional given that up to 18 percent of the mode share will be using LRT. As a result, emphasis should be given to the assumptions and understanding of the results to this new and unfamiliar mode of transportation to the Bel-Red Corridor and general DEIS audience. However, the detail provided for the traditional mode of transportation, the vehicle, was more than typically required for a programmatic EIS, but it was useful to properly disclose transportation impacts of the action.

Comments

the Study area more consistent in its future development patterns, and the Bel-Red Corridor Project Planning Principles.

The City's reply, in the form of more detailed analysis and complete information, is eagerly anticipated.

Sincerely,

Todd R. Woosley

Responses

Todd Woosley-7a

See response to Legacy-2. Any potential new zoning placed on properties in the corridor will take into account the appropriate mix of uses consistent with the Steering Committee's vision.

Todd Woosley-8a

See response to Bridle Trails Community Club-8.

Todd Woosley-9a

See response to Bellevue Chamber of Commerce-2. Additionally, the Preliminary Preferred Alternative is estimated to generate over 9,000 net new jobs, some of which will be associated with new employers to the area, and some of which will be with existing employers. Additionally, as the DEIS states, the improved access and mobility associated with the package of transportation improvements can provide economic benefits to businesses that remain in the area.

Todd Woosley-10a

Any potential new zoning for the corridor provides the opportunity for new ways of implementing development regulations. The City currently uses a primarily use-based framework for zoning. Following the selection of the Final Preferred Alternative by the Steering Committee, staff will draft new *Comprehensive Plan* and Land Use Code provisions in a manner that is most consistent with the committee's vision for the corridor.

Todd Woosley-11a

See response to Legacy- 2.

Comments**Responses****Todd Woosley-12a**

Comment acknowledged. An overall phasing strategy for putting zoning change in place that are synched with transportation capacity increases will be an important part of the overall implementation strategy for the corridor.

Todd Woosley-13a

All of the action alternatives evaluated in the DEIS, and the Preliminary Preferred Alternative analyzed in the FEIS, assumed a variation in development intensities in the corridor, based on suitability for future development, impact to adjacent neighborhoods, transportation capacity, potential for future light rail transit service, and a variety of other factors. This same approach is used throughout the City, including in Downtown Bellevue, where a mix of densities is allowed in different parts of the area. It is anticipated that the final vision adopted by City Council will allow differing densities throughout the corridor.

Comments

March 12, 2007

To: Carol Helland, Environmental Coordinator
Bel-Red@Bellevuewa.gov
Bellevuecouncil@Bellevuewa.gov

Cc: Bel-Red Steering Committee Members
 Kevin O'Neill

From: Peter Mears
 4407 137th Ave, NE
 Bellevue, WA. 98005

Subject: Bel-Red Project Draft EIS

Dear Carol:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement for the Bel-Red Corridor Project. Having seen the terrible land use and transportation planning that resulted in the mess at Factoria in South Bellevue, I'm grateful that the Bellevue City Council is willing to work with businesses and the neighborhood residents to develop a long-range plan for the corridor.

1 A key goal of the project should be to maintain or improve the livability of the current residents and to be fair to current businesses. This means that a successful EIS must identify all the impacts and devise specific mitigation for ALL the stakeholders. This means that environmental impacts to the surrounding neighborhoods must be considered as well. See *SAVE v. City of Bothell*, 576 P.2d 401 (Washington, 1978).

Chapter 2 Alternatives:

2 The No-Action Alternative is described as a "baseline" to measure the impacts of the action alternatives. I wouldn't use that word. I suggest the word "basis". A baseline is not necessarily the same as a no-action alternative. A baseline is essentially a description of the affected environment at a fixed point in time, whereas the no-action alternative assumes change even if the proposed project does not occur.

Alternative Description	New Residents	New On-Site Employment	New Housing Units	Traffic Volumes
No Action Alternative	290	2,367	0	18,542
Alternative 1. Mid-Range Employment & Housing	6,270	6,339	3,500	25,125
Alternative 2. Low Employment & High Housing	8,675	4,740	5,000	24,589
Alternative 3. High Employment & High Housing	8,675	9,249	5,000	26,637

Responses

Peter Mears-1

This programmatic EIS analyzes the potential impacts of implementing the land use and transportation vision as expressed in the Preliminary Preferred Alternative, and provides general mitigation strategies. Specific impacts and mitigation will be developed in association with project-specific State Environmental Protection Area (SEPA) analysis.

Peter Mears-2

Comment noted. The Bel-Red DEIS assumed land use changes in the No-Action Alternative as a basis for comparing the changes that would be anticipated in the action alternatives.

Comments

Chapter 5 Noise:

3 **Impacts:** The predicted 2030 traffic volumes on Table 5-1, and the predicted maximum 2030 traffic noise levels on Table 5-5 are frankly unbelievable. The Table suggests no (or no significant) difference between the alternatives although more businesses and residents are anticipated. Noise was measured at three street intersections within the project subarea. Why not measure potential noise levels in the adjacent residential subareas? Doesn't topography play a role in sound reception? You note that Sound Transit's LRT system would likely have cumulative impacts in the corridor. Why did you decide not to include the noise impacts of Sound Transit's LRT system? Studies haven't been done elsewhere? WAC 197-11-080.

Mitigation:

4 DEIS suggests noise mitigation may be required for new residential development but since the specific locations are unknown, the DEIS only discusses general guidelines. It is silent regarding adjacent neighborhoods. Were the neighborhoods adjacent to the corridor considered and were mitigations considered?

Chapter 7 Land Use:**Impacts:**

DEIS lists several principles that were most relevant to land use. See page 7-15.
 4: Build from Existing Assets.
 5: High-Capacity Transit as an Opportunity.
 6: Land Use/Transportation Integration.
 7: Community Amenities and Quality of Life
 8: Neighborhood Protection, Enhancement, and Creation.
 9. Sustainability.

5 In each action alternative, can an estimate be provided as to how many and where current small businesses will be lost? In light of increased vehicle traffic from the project, would not pedestrian safety be impacted? Will pedestrian overpasses be constructed at major street intersections? Or at least to the LRT stations?

Mitigation:

6 Local zoning needs to take into account the local small merchant. Pedestrian safety and convenience must be addressed. As mentioned on page 7-34, the city should consider open-space; green belts to separate current single-family neighborhoods from this higher density mixed use housing and commercial buildings. Adding lower-density office buildings and calling that a buffer is inadequate to meet the principles articulated by the city.

Responses

Peter Mears-3

See response to Sound Transit-10a. Traffic volumes, and the resulting noise impacts, are a factor of the extent of the road improvements and the traffic volume that each road is projected to carry. Because each of the alternatives includes similar proposed road improvements, there is little difference in traffic volumes among alternatives once the roadways reach their capacity. An audible increase in noise levels requires a doubling of traffic and/or a 50 percent reduction in distance from the noise source (see pages 5-3 and 5-4 of the DEIS). Therefore, the predicted small differences in traffic volumes would not result in perceptible differences in noise levels. See also the response to David Plummer-43a for an explanation as to why traffic volumes in Table 5-1 were similar across alternatives.

Peter Mears-4

Potential noise impacts were only analyzed for proposed residential development because that represents the location where traffic volumes are predicted to change significantly. In adjacent neighborhoods, traffic might increase slightly, but not enough to impact overall noise levels. Chapter 10 of the DEIS describes measures that could be used to minimize traffic intrusion into neighborhoods, such as traffic circles, chicanes, speed humps, pavement treatment, forced turn islands, and traffic diverters.

Peter Mears-5

See responses to Todd Woosley-3a and Coca Cola Bottling-4a. The Preliminary Preferred Alternative accommodates all existing light industrial and service uses for as long as their owners desire to stay. Pedestrian and bicycle facilities will be greatly improved over existing conditions as redevelopment occurs, although it is not anticipated that pedestrian

Comments

Chapter 9: Aesthetics

7 **Impacts:** All three action alternatives claim that multi-story (up to five or six stories), mixed use housing and commercial office buildings will provide opportunities for scenic views by residents and office workers. Visual quality would be increased by high-quality architecture. DEIS admits that additional lighting will result at night. I'm sure this is fine for the new residents. But how will the surrounding neighbors be affected? Could views from the higher ground north of the corridor be negatively affected?

Mitigation:

8 Perhaps a green-belt buffer zone between the corridor and the neighborhoods could mitigate? More trees planted? Again, I was looking for some more thoughts on what the city would suggest.

Chapter 10 Transportation

Impacts:

The predicted 2030 impact on traffic volumes on adjacent neighborhoods appear to be "not significant"?

9 "There is likely to be some traffic intrusion into the neighborhoods surrounding the Bel-Red Corridor, although the intrusion would not likely be significant." little to no change in screenline volumes are expected south of and east of the Bel-Red Corridor... Some neighborhood traffic impacts would likely occur to the north of the Bel-Red Corridor because some major roadways entering the Bridle Trails neighborhood still have underutilized capacity. These streets include 116th, 130th, and 140th Avenues NE. Page 10-34

Similar to my criticism about the seeming non-connection increase traffic volumes and increased noise, it seems unbelievable that increased traffic volumes from new thousands of new residents and workers would not lead to more congestion in the adjacent neighborhoods. You think we would learn from the Microsoft experience.

You need to explain your methodology better. No one will believe this statement as it is now written.

Mitigation:

10 Need to understand methodology. True spill-over effect must be understood and quantified. Islands, speed bumps, entrances could be constructed to make sure that commuters understand that they are entering a residential neighborhood.

Responses

overpasses will be constructed at intersections. Sound Transit is studying various light-rail alignments and station locations, and it is not known at this time how pedestrian access to the stations will be accommodated.

Peter Mears-6

See response to Dan Walton-1. As redevelopment occurs, parks and open space is expected to be integrated into new neighborhoods and along stream corridors. Bellevue may purchase some areas for parks, and private developers will integrate open space into their commercial and residential projects.

The lower intensity office area to which the writer refers is currently zoned and developed in that manner, and the vision is to retain this area south of Bel-Red Road with a similar intensity, while adding the potential for housing development.

Peter Mears-7

While the views of the Bel-Red Corridor from neighborhoods to the north would be different, it is not anticipated to be a negative effect, due to the topography of the corridor relative to surrounding uses and distant views. Please see the photosimulations provided in Appendix C of this FEIS to see how potential new building heights would impact views from various public vantage points.

Peter Mears-8

Several areas in the Bel-Red Corridor are proposed to have "green" streets or boulevards. Additional landscaping would also be done as roadway projects are implemented and as improvements are made to stream buffers in the corridor. From the north, these areas could significantly improve views into the corridor, which currently lacks these green areas.

Comments

Responses

Chapter 11: Public Services & Utilities

Impacts:

- 11 • You assume any new students can be “assimilated” into the current school population? Impact to Police/Fire/Emergency Medical Response will be assessed later? The city didn’t have adequate data to predict the increase to public services and utilities required by each alternative? I have to believe there exists estimating methods (based on new residents/new employees) that could provide some insight. In any case, it would seem to could be a differentiator for Alternative 3.
- 12 • What is the impact to surrounding communities that rely on the same Police/Fire/EMR? Could delays result?
- 13 • Solid Waste – Houghton transfer station currently serves North Bellevue and Bridle Trails. Adding this many new residents will impact an already overburdened facility. Can we really just worry about it later?
- 14 • Under all alternatives, city needs to assess the project’s impact to the utility infrastructure in the rest of North Bellevue and Bridle Trails. Will larger, heavier transmission lines be brought in? Will existing residents be required to hook up to city water; city sewer? Can you talk about all impacts to the surrounding communities?

Mitigation:

- 15 If local residents are required to upgrade sewer or water; developer(s) must be assessed and required to reimburse the local communities for these costs.

If you have any questions, please contact me at (425) 883-3434 or e-mail me at petermears@msn.com

Sincerely,

Peter Mears
 4407 137th Ave. NE
 Bellevue, WA. 98005
petermears@msn.com

Visual simulations from various public vantage points in and around the corridor are included in the FEIS.

Peter Mears-9

The City’s BKR forecasting model was used to determine expected traffic volumes on all streets in and around the Bel-Red corridor. Forecasting models are complex tools that attempt to replicate human behavior, i.e. driver’s decisions on what routes to take from point A to point B. Factors such as available routes, speed, location of land uses, and physical restrictions all influence the assignment of vehicles to certain streets within the model. The model is also calibrated to existing conditions, so that a high degree of trust can be placed on the model’s ability to predict the future. This is the best tool available to predict traffic behavior, especially 23 years into the future. As a result, the forecasts may not be exact, but they are reliable enough to indicate trends. It was the intent of the corridor study to provide enough capacity within the corridor to keep traffic infiltration into adjacent neighborhoods to a minimum. The trend results indicate , as documented in the DEIS, that without traffic calming devices, some traffic infiltration can be expected. The City acknowledges the sensitivity of this impact, and is willing to work with the affected neighborhoods to keep traffic infiltration to a minimum through traffic calming devices and other tools.

Peter Mears-10

See response to Peter Mears-4. The Bel-Red Corridor Project anticipates addressing neighborhood traffic and parking intrusion as part of a comprehensive implementation strategy. The traffic-calming methods employed on neighborhood streets are different from those employed on arterial streets. Specific traffic-calming methods will be determined outside of this EIS and will involve coordination with each potentially impacted neighborhood.

Peter Mears-11

As described in Chapter 11 of the DEIS, the impacts of changed land uses in the Bel-Red Corridor on public services and utilities were assessed through calculation of future quantifiable needs such as water and sewer service (based on projected population and employment

Comments

WAC Statutes

- [197-11-060](#) Content of environmental review.
- [197-11-080](#) Incomplete or unavailable information.
- [197-11-210](#) SEPA/GMA integration.
- [197-11-220](#) SEPA/GMA definitions.
- [197-11-228](#) Overall SEPA/GMA integration procedures.
- [197-11-230](#) Timing of an integrated GMA/SEPA process.
- [197-11-232](#) SEPA/GMA integration procedures for preliminary planning, environmental analysis, and expanded scoping.
- [197-11-235](#) Documents.
- [197-11-330](#) Threshold determination process.
- [197-11-400](#) Purpose of EIS.
- [197-11-408](#) Scoping.
- [197-11-442](#) Contents of EIS on nonproject proposals.
- [197-11-444](#) Elements of the environment.
- [197-11-660](#) Substantive authority and mitigation.
- [197-11-752](#) Impacts.
- [197-11-768](#) Mitigation.
- [197-11-786](#) Reasonable alternative.
- [197-11-794](#) Significant.

Responses

growth) and through discussions with service and utility providers. Appendix H in the DEIS includes additional information on how future demand was calculated. Increases in service needs would occur incrementally over more than two decades, thus allowing providers time to plan for and accommodate the growth. Based on conversations with representatives at the Bellevue School District, the projected increase in enrollment from any of the alternatives could be accommodated by in- and out-of District transfers, adjustments of attendance area boundaries, and capital improvement projects.

Peter Mears-12

As discussed in Chapter 11 of the DEIS, police, fire, and EMR service providers would address increased service needs by additional staffing, regulations (e.g., sprinklers in new buildings), and capital facilities planning. This planning would be done to ensure adequate service for the providers' entire service area, not just the Bel-Red Corridor. Development is anticipated to occur incrementally over the planning horizon, regardless of the alternative implemented.

Peter Mears-13

King County is evaluating the County's solid waste handling system for the next 20 years. This evaluation will take into account future population and employment growth in the region, including the proposed development in the Bel-Red Corridor. The City will work with King County to ensure effective coordination.

Peter Mears-14

City water and wastewater service is already provided to most properties in the Bel-Red Corridor; the area falls entirely within Bellevue's utility service areas. Utility service extension policies state that Bellevue will extend utilities to unserved properties on request, if the City's costs are recovered from benefited properties. Connection to the utility systems is normally required only for properties outside the city limits but within the City's ultimate service area, which is not the case in Bel-Red Corridor. Changes to Bel-Red Corridor land use would not impact the Bridle Trails Subarea policies regarding sewer extension.

Comments**Responses**

Water transmission mains may need to be upsized under the No-Action Alternative to accommodate recognized long-term storage and supply deficiencies. The transmission mains may be incrementally larger in diameter with higher densities; however, no more community disruption is envisioned. See the response to City of Redmond-8.

Under all of the action alternatives, both the water and sewer utilities would be able to accommodate proposed levels of development in the Bel-Red Corridor within their existing systems, while maintaining service to existing customers. It is not anticipated that increased service needs in the corridor would impact surrounding neighborhoods. It is not possible to determine whether incremental growth over the planning horizon would require new transmission infrastructure; however, such facilities are typically planned to serve larger regional needs. Any infrastructure improvements required to serve future utility demands would be evaluated as specific projects under the SEPA process. See the response to Bridle Trails Community Club-13.

Peter Mears-15

Bellevue's water and wastewater extension policies, as adopted in the Water and Wastewater Comprehensive Plans, require that the costs of direct utility system upgrades be borne by the benefited properties. Regional improvements such as water supply are generally repaid through Capital Recovery Charges assessed to new utility connections.

Requirements to change existing utility service are not anticipated; however, any such requirements would be imposed by service providers and would not be part of the Bel-Red Corridor Project.

Comments

Page 1 of 1

O'Neill, Kevin

From: Alan Carr [akrjcarr@comcast.net]
Sent: Monday, March 12, 2007 5:04 PM
To: BelRed
Subject: Bel-Red Corridor

1 I can tell you that from about 3 in the afternoon till past 6 in the evening the traffic is awful around 148th Ave, 156th Ave, 140th Ave, Bel-Red Road and NE 20th. The proposals to add more people/cars to the already bad traffic is insane. The stores, restaurants and car repair places would probably be affected --not in a positive way. I think you should leave this area alone! The No Change Alternative is the best choice.

Sincerely,

Ryan Carr
 1009 141st Pl. NE
 Bellevue, WA 98007

3/13/2007

Responses**Alan Carr-1a**

Comment noted. The change in traffic volumes, compared to the No-Action Alternative, are reported in the DEIS for each action alternative on 148th Avenue NE, 156th Avenue NE, 140th Avenue NE, Bel-Red Road, and NE 20th Street. Traffic volumes on some of these streets do not increase dramatically because, as noted in this comment, there is little capacity remaining on these corridors. However, it should be noted that each action alternative included significant capacity improvements in the area, including widening of 116th Avenue NE, 120th Avenue NE, 124th Avenue NE, and 130th Avenue NE in addition to new roadways such as NE 10th Street and NE 16th Street. This new capacity would accommodate most of the new vehicular traffic associated with each action alternative, allowing for only small increases in traffic on the existing congested roadways mentioned in this comment.

Comments

Page 1 of 1

O'Neill, Kevin

From: michael@grancorp.com
Sent: Monday, March 12, 2007 3:09 PM
To: BelRed
Subject: soccer fields

To Whom It may Concern

I support creating new active recreational parks and ballfields in the Bel-Red area, and believe this is needed for all of the alternatives. Growth throughout the City, including in Bel-Red and downtown, is increasing the cumulative need for parks. Especially when downtown's growth has not created new parks. Please consider the combined demand from downtown and the Bel-Red area to determine what is needed for parks and recreation features.

Thank you for your consideration.

Michael Heijer (425) 990-8233 or michael@grancorp.com

3/13/2007

Responses

Michael Heijer-1

See response to Drewenskus-1 and Devon Campbell-1.

Comments

Responses

O'Neill, Kevin

From: Ludwig, Cindy A [cindy.a.ludwig@boeing.com]
Date: Monday, March 12, 2007 2:32 PM
To: BelRed
Cc: Helland, Carol
Subject: Comments - DEIS for Bel-Red Corridor Study

It is with grave concern that I submit my comments. I have searched and searched the DEIS for supportive facts and data that would assist me in selecting some variation of any of the proposed alternatives for the Bel-Red Corridor. In the absence of substantive facts, I am left to agree with the many informed comments you have already received pointing out why the only PREFERRED ALTERNATIVE at this time is the NO ACTION ALTERNATIVE.

At all public hearings on this subject, I observed an overwhelming opposition to the study and re-development in general. Specifically, there isn't a housing need, a business need or any redeeming opportunity except for development of the Safeway property by the new owner. Many of the current property owners were left out of the Study altogether and it will certainly take more than a 1 1/2 hour open house to adequately compile their input, much less, provide the basis for a "Preferred Alternative". The only positive feedback I have witnessed is that of the new Safeway property owner and a handful of property owners who stand to gain from the trumped up need to re-develop the entire Bel-Red Corridor.

As a homeowner in the Bridle Trails subarea, I am opposed to the over-development of the Bel-Red Corridor and the negative impact of increased traffic and 20 years of unnecessary construction that will only intrude on the surrounding residential communities with noise, pollution, strain on utility services, loss of necessary services, and will degrade the quality of life for those individuals and their families who have invested in homes and businesses in the Bel-Red Corridor and surrounding communities.

This entire project has been rushed and haphazardly conducted. Please demonstrate your good judgement now before more taxpayer money is spent, and draw the only conclusion supported by the DEIS, the NO ACTION ALTERNATIVE is the preferred alternative. I am in agreement with the comments submitted by Heidi Benz-Merritt, Rensay Bennett, David Plummer, the Bridle Trails Community Club and Coca Cola.

Respectfully submitted,

Cindy A. Ludwig
 12336 NE 24th Street
 Bellevue, WA 98005

Cindy Ludwig-1

See responses to Bridle Trails Community Club-2 and -3. Ongoing and considerable public involvement has been a hallmark of the Bel-Red Corridor Project since its inception. Appendix B includes a chronology of all the public involvement opportunities, included targeted outreach to business and property owners. Early in the process, a market study identified the potential demand for both office and housing uses in the corridor.

Cindy Ludwig-2

Comment noted. City Council's Bel-Red Corridor Planning Principle 8 and one of the Steering Committee's objectives provide direction to address potential impacts on neighborhoods. Potential adverse impacts to neighborhoods and public services are addressed and will be mitigated as appropriate.

Cindy Ludwig-3

See response to Cindy Ludwig-1. The timeframe for this planning project began in October 2005 and has proceeded at a pace to ensure that the Steering Committee received adequate information and had appropriate deliberation time to make well thought-out decisions. There have been numerous meetings with the community and business/property owners in the area, as well as numerous briefings with City boards and commissions.

Comments

Responses

Page 1 of 1

Alan Carr-1b
Comment noted.

O'Neill, Kevin

From: Alan Carr [akrjcarr@comcast.net]
Sent: Monday, March 12, 2007 1:26 PM
To: BelRed
Subject: Bel-Red

I have been a resident of the eastside since 1963. The so called improvements have often created more problems for the residents of this area. My granddaughter has had to change ballet schools twice because of the "improvements" of displacing small businesses so much that they relocate to inconvenient locations or close entirely.

1 The alternatives proposed for the Bel-Red corridor, except the NO CHANGE alternative are going to force more businesses away that the people who currently live here use.

The only reason I see for making such changes are to make the landlords of the new businesses wealthier and to increase the tax base for the city of Bellevue.

The No Change alternative is my choice. I hope you listen to us since we're the ones who will have to live with the outcome.

Geraldine Ryan
1009 141st PI NE
Bellevue, WA 98007

3/13/2007

Comments

Responses

O'Neill, Kevin

From: bb517@scn.org
 Date: Monday, March 12, 2007 3:31 PM
 To: BelRed
 Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 3:31:09 PM

State: WA
 City: Bellevue
 Name: Krista Rave-Perkins
 Address: 12403 NE 28th Street
 Mailing List: Yes
 Comments: The following are my comments on the Draft Programmatic EIS:

Regarding Public Opportunity - I must express concern about what appears to be limited outreach in announcing the release of the DEIS. I attended an open house in 2006 for this project. My husband and I arrived at different times and so we each signed up separately on the sign in sheet. Therefore, there were duplicate email address and home address entries. We should have received an announcement, a card at various critical points in the process, either by regular mail or email. We have not received anything and found out about the comment period from a newspaper article written the middle of February. This gave me a very limited time to review the DEIS and provide comments.

I did not have the time to review the entire DEIS, nor did I have time to edit the following comments. However, I feel that this is an important document and I want to make sure that I provide what comments I can on what I was able to review.

The following comments are arranged in order of page number, followed by a general description of what I am commenting on.

DEIS Page 1-1, last paragraph "Thus, the environmental analysis is at a broad level that will assist..." Comment: Because this is a programmatic EIS, my comments also are general in nature as the environmental analysis is. However, these comments should be considered for addition to the Final EIS, even though they ARE general in nature. In other words, the danger of a broad level analysis is that while one may feel that the issues have been addressed, if the discussion remains broad misunderstanding of the intent is greater. Therefore, the more detailed discussion there is in this document, the greater likelihood that the intent is understood.

DEIS Page 1-5, Planning Principles, Number 7. Comment: Would like to see this amended to include a statement about not only protect existing resources, but improve natural resources from current conditions if possible. As the rest of the document indicates, existing natural resources are quite degraded and improving them where possible should be included as part of the principle.

DEIS Page 1-7, Alternatives Evaluated. "The future land uses best suited for the area would be primarily a mix of office and housing..." Comment: Earlier in the document (page 1-5), Number 3 Planning Principle, you stated the Bel-Red corridor should create land use not likely to be found in other city employment centers, particularly Downtown. Also on page 2-1, you talk about supporting business that will not compete with existing Downtown development. So, to decide on a mix of office and housing is contradicting these statements. Downtown has a high number of office buildings as well as condos and apartments. Downtown does not have light commercial. So light commercial Alternatives would seem to support Number 3 Planning Principle more than an Alternative that creates a high level of office space.

Table 1-3, Environmental Health (page 1-12) Alternative 2 and 3 say Mitigation would be the same as for the no action alternative and yet there is no mitigation outlined for the No action alternative - did you mean Alternative 1?

Table 1-3 Aesthetics (page 1-15) Comment 1: Alternative 2 and 3 mention mitigation, yet there is no mitigation outlined under Alternative 1. Additional comment: There are new

1

Krista Rave-Perkins-1

See response to Cindy Ludwig-1. The announcement of the publishing of the DEIS was made in a number of different ways, including e-mail to the interested parties list, posting on the project web site, and press releases published in a number of local publications.

Krista Rave-Perkins-2

The DEIS has been written in the greatest detail allowed by the current status of the City's planning process and the project alternatives. Individual land use or transportation projects in the Bel-Red Corridor will be required to undergo project-level State Environmental Policy Act (SEPA) analysis when they are formally proposed.

Krista Rave-Perkins-3

Planning principles were established by the City Council at the initiation of the project and have guided the work of the Steering Committee, staff and consultants. Bel-Red Corridor Planning Principle 9 directs the Steering Committee to incorporate environmental sustainability into the vision for the Bel-Red Corridor. The Preliminary Preferred Alternative assumes improvements to the stream corridors will accrue as redevelopment occurs and as city investments are made.

Krista Rave-Perkins-4

Comment noted. The market analysis conducted early in the planning process identified a potential demand for additional office and housing in this portion of Bellevue. The Preliminary Preferred Alternative assumes a unique (to Bellevue) mixed-use development pattern concentrated in nodes that could be served by future light rail. This is consistent with the City Council's Bel-Red Corridor Planning

Comments

Responses

	technologies with lighting that can greatly reduce the impact to residents in nearby neighborhoods - The City of Seattle is planning to use new lighting technology for the proposed new fields at Magnuson Park, which is expected to greatly minimize any impact on the surrounding neighborhoods overlooking the Park.
7	Page 2-17, Environmental Sustainability. Comment: I applaud the beginning paragraph that discusses Bellevue City Council's principle of sustainability and the objective to be sensitive to natural resource protect, energy and resource conservation and transportations choices. (Though I find it ironic about energy conservation when the same Bellevue City Council recently approved a plan to cut global warming and left out a couple of strategies - most notably installing energy-efficient lighting - The Seattle Times, Eastside, Thursday March 1st, 2007 "Bellevue Moves to Cut Global Warming")
8	Page 2-17 Protecting and enhancing natural resources, "Low impact development techniques that minimize impervious surface and infiltrate stormwater runoff into the soil can reduce erosion..." Comment: Not only does LID provide all of the benefits listed, it also creates less demand on traditional stormwater structures.
9	Page 2-17, Energy and resource conservation. Comment: In addition to the sustainable development items you list, installing energy efficient lighting should be included. It can be done now and as technology improves (which it will) can be done in the future through 2030.
10	Page 4-1, Watershed Processes, Sustainable Urban Watershed Processes. Comment: I fully endorse the beginning paragraph that discusses providing incentives to go beyond the mitigation requirements of a standard SEPA EIS. Regulatory is only one piece of the puzzle. If true improvements are to be made, then incentives are going to have to be a big piece of that puzzle.
11	Page 4-18, Operational impacts, 4th paragraph. I strongly agree with this paragraph - existing regulations constrain how much benefit is achievable and there will need to be a combination of new and stronger regulations AND incentives for developers, as well as programs to acquire and enhance high value habitat by creating park resources in the corridor (not exclusively through ball fields or large lawn picnic areas). The Washington Department of Ecology commented on possible tools that could be used in their December 20, 2005 Bel-Red Corridor Project Scoping comment letter. The tools included resource restoration and land acquisition as part of the City capital projects or other City programs, and incentives to landowners to restore and enhance the streams and wetlands on privately-owned properties.
12	In addition to all of this, the City of Bellevue needs to incorporate LID technologies into their own projects funded by the City. When a project is City funded, they need to "walk the walk" and go above and beyond current regulations. An example is the sidewalk project on NE 24th Street, currently under construction. I understand this project falls under Capital projects. LID technologies currently used in other cities across the country were not used here. The old way - traditional high curbs were installed along the street, and any street runoff is forced to run all the way down the street and into a traditional stormwater system, rather than create small "swales" to allow the street runoff to infiltrate into the ground. (Technology used in Seattle and Portland.)
13	Page 4-19 Offsetting Factors. Infiltration difficulties. Comment: As information later in the report indicates, infiltration within each of the basins would benefit from LID technologies and would be successful and reduce runoff into surface waters.
14	Page 4-21, Goff Creek. General comment: If memory serves me correctly, Goff creek flows by the old location of the newspaper facility, which already has established vegetation, which could be enhanced by more vegetation and removal of parking/impervious surface. Also support the recommendation to removing fish passage barriers along Goff Creek. The upland portion of Goff Creek runs through residential area that is relatively nice habitat - shaded etc.
15	Page 4-22, Valley Creek. Comment: A summary of Alternative 2 was left out of the discussion and should have been included. From information in the rest of the document, it appears that Alternative 2 would also provide opportunities for improvement.
16	Table 4-7, West Tributary. Alternative 2. I disagree with the comment that it would

Principles and the Steering Committee objectives. See response to David Plummer-19a.

Krista Rave-Perkins-5

Typographical error acknowledged. The errata sheet included in the FEIS will include the correct reference to Alternative 1.

Krista Rave-Perkins-6

Comment acknowledged. The summary table has been modified to include the mitigation measures.

Krista Rave-Perkins-7

Comment acknowledged. Sustainability, in a variety of ways, is embedded in the Preliminary Preferred Alternative and will be evaluated in more detail as a component of the implementation strategy.

Krista Rave-Perkins-8

Comment acknowledged.

Krista Rave-Perkins-9

Comment acknowledged.

Krista Rave-Perkins-10

See response to Bellevue Chamber of Commerce-4. A combination of existing regulations and incentives and City programs will be employed.

Krista Rave-Perkins-11

See response to Krista Rave-Perkins-10. Enhancements strategies will be developed that use the best practices developed in the region.

Comments

Responses

offer little opportunity to reduce impervious surface. Depending on the LID techniques that are used, there are ways that impervious surface could be decreased substantially. For example, if pervious parking lots are used strategically throughout the entire Bel Red corridor (such as those being used in the West Seattle High Point neighborhood), there could be a substantial decrease in impervious surface. Also, there are pockets throughout West Tributary that could be enhanced and enlarged, which would create a huge benefit. Those techniques can be used using Alternatives 1, 2 or 3.

17 Page 4-25, Mitigation Measures, Operation. General Comment 1: While I support and agree with all of these recommendations listed, I suggest adopting incentives for all streams, not just the three mentioned.

18 General Comment 2: There are some additional ways to provide incentives that could (and should) be explored and used. Those include: tax incentives for developers and landowners within the corridor, "cost share" of construction cost difference between traditional construction and new LID technologies, maintenance of City streets to include parking lots created using pervious surface technologies etc. For instance, if a landowner decides to upgrade to a "green roof", the City can provide incentives through the permitting program or through tax cuts, for if a green roof operates as it should, it decreases the Cities' need to upgrade sewer systems etc, which in turn keeps the City from having to charge landowners more for increased traditional sewer system needs.

19 Given the limited amount of time I had to review the DEIS, and of the alternatives proposed, I recommend either Alternative 2 or 3. With an interest to consider current businesses in the area, Alternative 2 would displace slightly less light industrial businesses and would benefit those streams that have a higher rating (Valley, Sears and Goff). Therefore, I recommend Alternative 2, with a recommendation to encourage opportunities for improvement of water quality and habitat in the West Tributary followed by unnamed and Lake Bellevue/Sturtevant Creek.

Krista Rave-Perkins

Zip: 98005

Krista Rave-Perkins-12

Low-impact development technologies are anticipated to be employed as new transportation system infrastructure, parks, and other public projects are developed as well as when private parcels are redeveloped.

Krista Rave-Perkins-13

Comment acknowledged.

Krista Rave-Perkins-14

Goff Creek flows in an open channel through most of the properties upstream of 132nd Ave NE. The vegetation and buffers could be enhanced along most of the properties, though existing regulations do not require removal of impervious surfaces. Goff Creek above State Route 520 has perennial flow, good coniferous canopy, and known amphibian habitat, even though at an index of 14-18, it shows impaired benthic index of biotic integrity (B-IBI). The topography and general habitat indicate that the area was likely historically used by trout and coho salmon, leading to the recommendation to restore fish passage.

Krista Rave-Perkins-15

Comment acknowledged. The components of the Preliminary Preferred Alternative are described in the FEIS.

Krista Rave-Perkins-16

Alternative 2 would have retained a Light Industrial sanctuary in much of the West Tributary watershed. Opportunities for redevelopment – and thus to employ low impact development techniques – would be limited where little land use change was anticipated.

Comments**Responses****Krista Rave-Perkins-17**

Comment acknowledged.

Krista Rave-Perkins-18

Specific implementation strategies, including potential incentives, are outside the scope of this EIS, although several are noted as potential mitigation in the Watersheds chapter. With City Council direction, a range of implementation strategies will be considered. Several boards and commissions will participate in this effort, and the Planning Commission will develop a final recommendation for the City Council to consider.

Krista Rave-Perkins-19

Comment acknowledged.

Comments

Responses

Unknown (na@na.com)-1

See response to Dan Walton-1 and Devon Campbell-1.

O'Neill, Kevin

From: na@na.com
Date: Monday, March 12, 2007 3:55 PM
1
Subject: Bel-Red Corridor Project Comment

Date Sent: 3/12/2007 3:54:59 PM

City:
Name:
Address:

1 | Comments: As growth continues throughout Bellevue, so does our city's need for additional community parks, paths and recreational areas. I support the creation of these new recreational parks and ballfields and ask the that the committee consider the overall growth demand when determining what is needed for parks and recreation features.

Thank you for your consideration.
State:
Zip:

Comments



www.habitatkc.org
P.O. Box 817
Redmond, WA
98073-0817
Ph: 425-869-6007
Fax: 425-883-8809

Executive Director
Tom Granger
Associate Director
Mia Walterson

Board of Directors

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Dan DeYoung
Sally Gregg
Reba Mart
Bob Patterson
Brad Toft

Our mission is to empower families, build community, and create hope through an aggressive home-building ministry.

March 12, 2007

Ms. Carol Helland
Bellevue Department of Planning & Community Development
P.O. Box 90012
Bellevue, WA 98009-9012

Dear Ms. Helland,

Thank you for the opportunity to comment on the Draft EIS for the Bel-Red Corridor Project. My comments relate both to the adequacy of the document and the merits of the alternatives.

It appears that the process and therefore the document have not addressed affordable housing in the consideration of the redevelopment of the Bel-Red Corridor. Bellevue has the highest number of low-income families of any city on the Eastside. The redevelopment of the Bel-Red corridor is an excellent opportunity to address decent housing for this segment of the population and should be part of the process, and therefore this document, right from the beginning.

The alternatives presented in the document do not address affordable housing. This overlooks one of the major positive impacts of the redevelopment project. The relative inclusion of affordable housing and Bellevue's plan to incentivize housing developers should be included in each alternative so that it can be evaluated along with the other impacts.

I look forward to hearing how affordable housing will be included and evaluated in this process as it proceeds.

Sincerely,

Tom Granger
Executive Director

Responses

Habitat for Humanity-1

A major challenge for Bellevue and other Eastside cities is the ability to provide affordable housing for all economic segments of the population. While no one area of the city will solve Bellevue's affordable housing challenges, the Bel-Red corridor provides a major opportunity to supplement the citywide supply of affordable/workforce housing. In an area that currently has very limited housing potential based on existing zoning, the Preliminary Preferred Alternative's development program for Bel-Red includes the potential for 5,000 new housing units in vibrant, diverse neighborhoods. Part of the Bel-Red Steering Committee's vision for these neighborhoods, tentatively adopted on June 13, 2007, is that they "will contain a variety of housing types to meet the needs of a diverse population of varied income levels."

Providing a range of housing choices requires a multi-faceted approach. A Regional Coalition for Housing (ARCH) has worked aggressively and collaboratively since 1992 to increase the supply of affordable housing on the Eastside and in Bellevue. Bellevue has been a major financial contributor to ARCH since its inception. Currently, the city has a voluntary (though not often used) citywide density bonus provision and allows transportation impact fee waiver for affordable units. Also, smaller senior units, although not tied to affordability, currently count as half a unit for purposes of density calculation. Some of the options that the city could consider on a citywide basis or for the Bel-Red corridor include:

- Developing new incentives for density, height and other development standards for affordable/workforce housing.
- Use of the state's multifamily property tax abatement provisions (tied to providing affordable/workforce housing).
- Use of surplus properties for affordable/workforce housing. Remnant sites may be available through infrastructure development in the Bel-Red corridor.
- Explore linking the upzoning of property to a provision that a percent of new units are affordable.
- Seek new or enhanced partnerships with non-profits or employers for developing affordable/workforce housing.

Comments

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Following the Bel-Red Steering Committee process, the Bellevue City Council and Planning Commission will carefully consider appropriate implementation tools that will guide redevelopment of the Bel-Red corridor, consistent with the new vision. This will occur in Fall 2007 through Spring 2008. How to meet the needs of a “diverse population of varied income levels” is among the issues to be considered in this implementation process.

Comments

Responses

Page 1 of 2

O'Neill, Kevin

From: Alan Carr [akrjcarr@comcast.net]
 Sent: Monday, March 12, 2007 1:05 PM
 To: BelRed
 Subject: BELRed DEIS Comments

1 I am very concerned with the amount of housing and the size of the buildings that are being proposed. All of the streets in the Bel-Red corridor East-West and North-South are already overcrowded between 4pm and 6pm. Drivers inch along many of the roads; adding additional workers and residents is going to make some of these roads unbearable. That would mean after adding more people the next step would be widening our streets. The proposals, except no change alternative, will be adding more traffic which is not only adding to the air pollution, the noise pollution and I fear widening of streets to accommodate more traffic will start eroding our neighborhoods. Resale? We will end up living closer to busy streets and what was once a nice quiet area is not so nice anymore. Most people looking for homes in the area would pass on some neighborhoods because of noise and safety for their families.

2 Also, as I understand it, another proposal for the Crossroads area is adding a staggering number of housing. Between Crossroads and the Bel-Red alternatives anybody caught in the middle of those two projects is going to suffer the most effects of the overcrowding. All the drivers in our family have commutes of one to three miles. This was a well planned move to lessen our commute, to lessen the gas we use, to cause less pollution and to be close the businesses we frequent. The roads we most frequently use are Bel-Red, 140th, NE 8th and 148th and it is incredible how long those commutes already take during certain times of the day. The mid-day and evening traffic in the Overlake area is so heavy at times you can sit through a couple lights unable to get through the intersections. We need less traffic in these areas not more. In fact it would be nice if the freeways could lessen the traffic burdens on some of our surface streets. The city should look at more incentives to businesses to stagger their work shifts or use transit systems. If you think your transit proposal will fix the problems just look at how many people don't use busses or HOV lanes. Furthermore, the operational impact section under Air Quality states that maintaining traffic flow will reduce idling and therefore, reduce emission, but it is difficult to tell what traffic flow steps will be taken. Currently even when roads are clear, it is all too common that we must sit and idle in a left turn lane when there is no oncoming traffic. With rare exceptions we are over-regulated by left turn lanes that force us to wait and burn gas. It is unclear to me what steps the city has in mind to improve flow, because there are improvements that could be made today if the city wished to reduce emissions by improving traffic flow.

6 The chapter 1 summary attempts to trash the No Action Alternative by stating "without changes to the existing land use designations and zoning, it would be difficult for these stations to realize their full potential to support the LRT ridership". I believe it is unacceptable for the City of Bellevue to tell us that in order to make the LRT cost-effective, we should remake the surrounding neighborhoods. LRT must stand on its own merits or be canceled!

7 Air quality Table 3-3 shows increases in all categories of emissions above those of the No Action Alternative. Yet the report concludes no adverse air quality impacts. Alternatives 1, 2 and 3 lower the air quality in my neighborhood when compared to the No Action Alternative. While it may not exceed recognized air quality standards, more carbon monoxide in the air we breathe is an adverse impact on my family. It appears that the negative impacts of the proposed rezones have been downplayed.

8 Apparently the eastside of Bellevue gets all the adverse proposals. I certainly don't see the downtown

3/13/2007

Alan Carr-1c

Comment noted.

Alan Carr-2c

Comment noted. Transportation infrastructure improvements are included as a component of the Preliminary Preferred Alternative.

Alan Carr-3c

See response to Wright Runstad & Co.-11. Transportation demand management programs may be required, and would be implemented by employers to encourage alternative commuting modes to reduce peak hour travel. A number of incentives are available to both employers and employees, not the least of which is a shortened commute.

Alan Carr-4c

Comment noted. An air quality analysis will be conducted as part of the Transportation Facility Plan EIS, which will be updated to include proposed Bel-Red Corridor projects.

Alan Carr-5c

Whenever possible, agencies allow "permissive" lefts, or left turns that must yield the right-of-way to oncoming traffic. However, at left-turn lane locations, where left-turn movements are only permitted with a protected green light, the agency may conclude that for sight distance purposes and/or high opposing traffic volumes, the safety of the driver takes precedence over the convenience of being able to turn left whenever a gap is available. This is a safety and liability issue, as opposed to an air quality issue.

Comments

Page 2 of 2

9 high-rises, street widening or transit centers expanding to the west through Clyde Hill, Medina or
 Enatai. We can take a lesson from what happened up at the Lake Hills shopping center. When new
 ownership took over the rents escalated forcing some of the local business owners to close or relocate.
 10 The neighborhood lost some familiar, convenient shops. My family has routinely patronized many
 businesses in the Bel-Red Corridor over the last 15 years. Many of these businesses have been fixtures
 and should be permitted to remain right where they are. Compared to alternatives 1, 2, and 3 the current
 zoning mix is fine for the existing community. The proposed rezones will adversely affect small
 11 business owners. Offering the ability to relocate is not a good alternative for some businesses as this will
 cause some to just close their doors. Once such businesses are lost they are gone – and there is no
 guarantee that a replacement will provide the same services. It appears to be an oversight that current
 business owners have not been adequately represented on the steering committee.

12 My vote is for NO CHANGE!

Sincerely,
 Karen Carr
 1009 141st Place NE
 Bellevue, WA 98007

3/13/2007

Responses**Alan Carr-6c**

Comment noted. The City Council adopted several principles to frame the project, one of which was that the light-rail transit (LRT) was an opportunity to enhance mobility in the corridor and effect land use change (Bel-Red Corridor Planning Principle 5). The intent of framing land use alternatives (including the Preliminary Preferred Alternative) is not to make LRT cost-effective, but rather to maximize on the opportunity that light-rail service to the corridor could provide. There are many other issues that framed development of the alternatives and the Preliminary Preferred Alternative, as outlined in the 10 planning principles adopted by the City Council and objectives adopted by the project Steering Committee, which are summarized in Chapter 1 of the DEIS. A number of significant transportation system improvements are planned to accommodate traffic within and traveling through the Bel-Red Corridor. In addition, facilities for pedestrians and bicyclists will be added and light rail is proposed to serve the corridor.

Alan Carr-7c

The National Ambient Air Quality Standards, to which the No-Action Alternative and action alternatives were compared in the DEIS, are “presumptive” standards. This means that the standards were set at levels that have been demonstrated through scientific research to be protective of human health. As long as the standards are met, a project is presumed not to have negative impacts on human health and the environment, even if emissions increase above existing conditions or No-Action levels. More detailed information on air quality impacts will be documented in the EIS for the update of the *Transportation Facility Plan*.

Comments**Responses****Alan Carr-8c**

Comment noted. In the action alternatives analyzed in the DEIS, and in the Preliminary Preferred Alternative, most of the land use intensity in the Bel-Red Corridor is focused on the west end of the study area—the area closest to Downtown Bellevue. One potential area of concentration, for housing uses, is on the east end of the corridor near 156th Avenue NE.

Alan Carr-9c

See response to Bridle Trails Community Club-8.

Alan Carr-10c

See response to Bridle Trails Community Club-8.

Alan Carr-11c

The Steering Committee was appointed by the Mayor and confirmed by City Council in October 2005. The committee includes two representatives from the Bellevue Chamber of Commerce to represent the broader business community. As noted in Bellevue Chamber of Commerce-7, outreach to the local business community has been extensive.

Alan Carr-12c

Comment noted.

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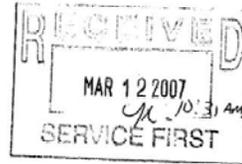
Comments

Responses

9 March 2007

✓ Carol Helland,
City of Bellevue Environmental Coordinator
Bellevue, Washington

cc: Bellevue City Council
Members, Bel-Red Corridor Project Steering Committee
Department of Ecology, State of Washington



Dear Ms. Helland:

I have attached my comments on the draft environmental impact statement for the City's proposed "Bel-Red Corridor Project," dated 25 January 2007. I solicit a response from the City to my comments, and request that they be included in the final EIS for the Project.

Please note that tables and figures included in my comments bear decimal-numbered pages. For example, a figure or table following page 5 will be numbered 5.1; more than one figure or table between two pages of text will be numbered, for example, 7.1, 7.2, etc.

I recommend that this DEIS be extensively revised and reissued. Failing such action, I recommend the 'no-action' alternative be selected as the preferred option for further analysis in the EIS for the Project. Clearly, this alternative:

- (1), has the least impact on the environment;
- (2), places fewer demands for electricity production and natural gas delivery, thus contributing to reduction in global climate-change processes;
- (3), has significantly lower transportation system impacts;
- (4), provides ample opportunity for Corridor property and business owners to exploit the economic returns to their ownership;
- (5), is significantly lower in cost to Bellevue and other Regional taxpayers;
- (6), is almost wholly compliant with all ten of the City Council's planning 'principles' for the Corridor; and
- (7), enables the City staff and Council wider latitude for considering future land use changes in accordance with property and business owners' petitions based on their appraisal of market demands rather than the contrived and unsubstantiated estimates made by City consultants at one point in time.

Please add my name as a Party of Record in this matter.

Sincerely yours

David F. Plummer
David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007-4001

Attachment: Comments on Bel-Red Corridor Project draft environmental impact statement, dated 25 January 2007.

David Plummer 1a

See responses to more specific comments below.

David Plummer 2a

See responses to more specific comments below.

David Plummer 3a

See responses to more specific comments below.

David Plummer 4a

See responses to more specific comments below.

David Plummer 5a

See responses to more specific comments below.

David Plummer 6a

See responses to more specific comments below.

David Plummer 7a

See responses to more specific comments below.

David Plummer 8a

See responses to more specific comments below.

David Plummer 9a

See responses to more specific comments below.

Comments

Responses

**Comments on Draft EIS for City of Bellevue's Proposed
Bel-Red Corridor Project**

1. GENERAL

10 1.0 The draft EIS (DEIS) has been prepared as a 'programmatic' or 'non-project' document in accordance with WAC 197-11-442; therefore, the word 'project' should be dropped from the title of the document. The title (and all supporting documents) should be clarified to more accurately reflect the nature of the proposal, which one assumes is to modify/revise various elements of Bellevue's comprehensive plan, subarea plans, and the City's land use code. This change is required to make the document conform to WAC 197-11-960, which indicates that for *nonproject actions* of this sort, the terms "proposal" or "affected geographic area" would be more appropriate.

11 1.1 The description of the 'no-action alternative' should be revised to more specifically identify where (in relation to the Bel-Red corridor) the "... increased population and/or employment in nearby areas ..." would occur that are referred to on pages iii and 1-8 of the DEIS. The magnitude, type, and approximate time-frame of anticipated changes should be described, and references given for the source of the estimates.

The existing Bel-Red corridor area (as defined by the Bel-Red/Northup subarea plan) is surrounded on the north by the Bridle Trails subarea; on the south by the Wilburton subarea; on the west by I-405 and the North Bellevue subarea; and to the east by the City of Redmond's Overlake area. While some changes in land use and population/employment growth are anticipated in the vicinity of the Overlake Hospital area, and in Redmond's Overlake area, these changes could hardly be expected to have dramatic implications for the Bel-Red Corridor. However, property owners in the Corridor would be expected to propose land-use/zoning changes through normal City procedures under a "no-action alternative." This type of normal/evolutionary change is to be expected, with concomitant responses from the City, e.g., with changes to zoning, new transportation infrastructure, etc.; the DEIS should clarify this probable development because the existing zoning allows property owners considerable latitude in developing their properties.

12
13 The DEIS also misleads readers (on page 7-19) by asserting that (under the 'no-action' alternative) the City would not be able to accommodate any pressure for such evolutionary land-use/zoning changes within the Corridor because it would be "... limited by the existing zoning and transportation system." *This is simply not true:* the City would respond to such pressures as it has in response to similar pressures for the last 50 years by changing the zoning, modifying the transportation-system infrastructure, and improving streams and other features of the non-built environment. Indeed, potential transportation-system changes contemplated under this ('no-action') alternative include possible routing by Sound Transit of an LRT line "... through the Bel-Red Corridor as (part of) ... the East Link Project" in accordance with Sound Transit's Board motion no. M2006-87.

David Plummer-10a

Comment noted.

David Plummer-11a

Comment noted.

David Plummer-12a

The City Council initiated the Bel-Red Corridor Project in 2005, in part to address the haphazard manner in which land use changes had been taking place in the corridor – as proposed by individual property owners seeking zoning changes. The Council determined that a comprehensive, long-term analysis of future land use and transportation alternatives – with possible subarea plan and zoning changes – was an appropriate way to address incremental change. Any changes in the land use/zoning designations in the corridor will require amendments to the *Comprehensive Plan*, and are therefore not compatible with the No-Action Alternative, which assumed no changes to the underlying policy framework in the corridor.

David Plummer-13a

"Evolutionary" land use changes cannot always be anticipated; therefore, the long-term planning, with dedicated funding, necessary for transportation system improvements is not possible. An integrated, long-term phasing strategy for land use and transportation in the Bel-Red Corridor will help ensure that essential transportation system improvements will be developed consistent with and concurrent with land use changes. A routing of light rail through the corridor would likely not include stations without the demand for those stations created by higher intensity land use with a mix of housing and office uses.

Comments

Responses

Table 1. Partial List of Uses Allowed In Districts Within Bel-Red Corridor Under Existing Zoning

Lnd Use Code	Type of Use	DISTRICT			
		Office (O)	Light Industry (LI)	Gen. Comm. (GC)	Comm. Bus. (CB)
1	2-5 Residential Unit Struct.	P	-	-	P
13, 15	Motels & Hotels	-	-	-	C
6515	Nursing/Asst'd Lv. Facilities	P	-	-	P
22; 23	Textile & Clothing Mfg.	-	P	-	-
25	Furniture Mfg.	-	P	-	-
27	Printing/Publishing	-	P	P	-
314, 32x	Plastics & Ceramics Mfg	-	P	P	-
329	Handcrafts Mfg.	-	P	P	P
3427	Computer/Off. Mach. Mfg	-	P	P	-
34xx	Elec. Eq.Mfg., TV/Comm Pts	-	P	-	-
35	Meas./Optic.Equip.; Sftwr	P	P	-	-
4291	Auto//Taxi Terminals	-	P	P	P
475	Radio/TV Broadcst Studios	P	P	P	P
485	Utility Facility	C	C	C	C
51	Whlse Trade	-	P	P	-
52x	Lumber & Bulky Mats	-	P	P	P
5251	Retail Hrdwr, Paint, Tile	-	S	P	P
53	Retail Gen. Merchandise	-	-	-	P
58	Eating/Drinking Estab.	P	P	P	P
61	Finance/Insur./RE Services	P	P	P	P
62	Personal Sevices	-	P	P	P
63	Child Care Services	P	P	P	P
637	Warehsing/Storage Service	-	P	P	S
6xx	Medical//Health Services	P	-	P	P
682	Universities/Colleges	P	P	P	P
683	Special Schools	P	P	P	P
69x	Software/R&D Services	P	P	P	-
74xx	Recreation Activities/Clubs	C	P	P	P
- 76	Private/Public Open Space	P	P	P	P
81	Agricultural Production	P	P	P	P
8221	Vet. Clinic/Hospital	P	P	P	P
Max. Bldg. Height Allowed, ft		30-45	30	30-45	45-60

Source: Bellevue Land Use Code 20.10.440

- Notes: 1. Use Codes: P - Permitted Use; C - Conditional Use; S - Subordinate Use
- 2. Some 'P' uses subject to special conditions.
- 3. Multi-Family uses not shown since it is only 1% of area.

Comments**Responses****Table 2. Number of Uses Allowed in Bel-Red Corridor Zoning Districts**

Zoning District		Number of Uses Allowed In Each District			
Name	Approximate % of Land Area	Permitted	Permitted as Subord. Use	Permitted as Cond. Use	Permitted as Adm. Cond. Use
LI- Light Ind.	51	59	5	18	3
GC- Gen. Comm.	20	55	11	18	2
O- Office	17	33	-	19	2
CB- Comm. Bus.	12	55	16	20	3
MF-M Multi-Family	1	19	1	21	2

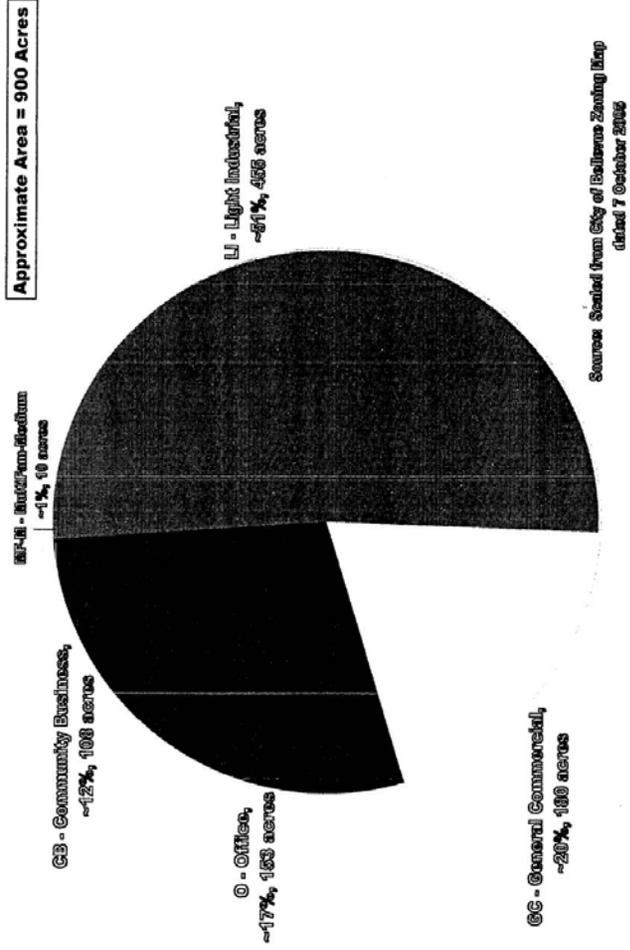
Approx. Total Area 900 acres

- Source:
1. Number of uses: Bellevue Land Use Code 20.10.440
 2. Total area scaled from City of Bellevue map of Bel-Red Corridor study area, 7Oct2005.

Comments

Responses

Figure 1. Bel-Red Corridor Zoning



Comments

Responses

1.1, continued

14 It is especially important to clarify this issue because the existing zoning of the land area and the uses allowed under Bellevue Land Use, Code Chapter 20.10, permit property owners in the Bel-Red Corridor wide latitude in using and developing their properties within the Project area. Table 1, Table 2, and Figure 1 clearly show that within each of the 4 major zoning areas in the Bel-Red Corridor, there are many permitted uses which property owners have available to increase the economic land rents on their property. If they conclude that higher intensity land-use/zoning would enhance the value of their property they can apply for changes through Bellevue's normal 'rezone' procedures.

15 The Washington State *SEPA Handbook* (publication # 98-114, updated 2003), para. 3.3.2.1, notes that 'no-action alternatives' are "... typically defined as what would most likely happen if the proposal did not occur." Since the City has ample and extensive experience with land-use/development prospects for areas (or portions of areas) similar to the Bel-Red Corridor, it is entirely possible for the City to project such development scenario(s) for this area under the 'no-action alternative.' Failure to do this mistakenly leads readers of the DEIS to conclude that the area would experience no evolutionary development in the next several decades unless the City's preferred scheme (intensify land-use/zoning) is adopted.

16 In revising the 'no-action alternative' to improve its veracity, the revision should also clarify that Sound Transit's possible routing of an East-Link LRT line includes consideration of Sound Transit Alternative D5 (a route along BNSF/SRS520 from downtown Bellevue to Overlake). Further, the assertion (page 1-8 of the DEIS) that LRT stations at Overlake Hospital and 152nd Avenue NE would not 'realize their full potential' is totally unsupported by any analysis; this statement should be deleted from the DEIS.

17 1.2 During the City's recent (2004/2005) update of the City's Comprehensive Plan, the zoning and planning policies for the Bel-Red/Northup subarea (virtually identical to the Bel-Red Corridor Project area) were reviewed. The City Staff, Planning Commission and City Council made no changes (other than reformatting) to the Bel-Red/Northup subarea plan. And there have been no dramatic or significant changes to the subarea since the 2004/2005 update. Thus, there is no evidence that the Project area zoning needs to be changed.

18 1.3 Bellevue's Buildable Lands Report dated 31 October 2001 (page 8) confirmed that "... the City can accommodate both its 2012 housing and jobs targets without the need to change the Comprehensive Plan or rezone additional properties to higher densities or intensities." This same conclusion was confirmed to the Bellevue Planning Commission in October 2003 as part of the Bellevue Planning and Community Development Department's review of the 20-year growth targets for Bellevue's Comprehensive Plan update; and to the Bellevue Transportation Commission in June 2005. And King County's Buildable Lands Evaluation Report (September 2002) likewise concluded that "... King County has well over the capacity needed to accommodate the growth that is expected to occur by 2012." Also, Bellevue's Comprehensive Plan (amended through January 2006, page 37 of the Land Use Element) states that "Bellevue has established that it has the zoning capacity to meet the housing and employment targets..." through 2022; there is no mention of a need to rezone the Bel-Red Corridor.

3

David Plummer-14a

See response to David Plummer-12a. All of the action alternatives analyzed in the DEIS, and the Preliminary Preferred Alternative analyzed in the FEIS, assume that some existing land use patterns and zoning would remain in the corridor, such as the office designations along 116th Avenue NE, and commercial/retail designations along the NE 20th Street corridor. The major focus of potential change is within the area currently designated for light industrial land uses.

David Plummer-15a

Comment noted.

David Plummer-16a

Comment noted. The alternatives analyzed in the DEIS were the Steering Committee's land use and transportation alternatives, and do not represent the several possible routings for a light-rail corridor that Sound Transit will analyze in its own EIS.

David Plummer-17a

The 2004 *Comprehensive Plan* update did not include a subarea-by-subarea review, and no substantive changes were made to the Bel-Red/ Northup Subarea. The Bel-Red Corridor Project is that substantive review, the results of which may lead to policy amendments.

David Plummer-18a

There is no conflict between the action alternatives evaluated in the DEIS and buildable lands reports generated by the City of Bellevue or King County. Two of the reports referenced refer to evaluation by Bellevue and King County relating to employment and housing targets established for the period

Comments

1.3, continued

The conflict between the City's Buildable Lands Report (and subsequent analyses and presentations to the Planning and Transportation Commissions by the Staff, King County's Buildable Lands Report, and the Comprehensive Plan) and the actions proposed under DEIS alternatives 1, 2, and 3 needs to be discussed and rationalized.

1.4 The City Council and the City's comprehensive plan have long espoused the theme that future employment and residential growth will be concentrated in the Downtown Subarea. As proposed under DEIS alternatives Action 1, 2, and 3, 2.5-4.5 million square feet of commercial development, 4700-9200 new employees, 3500-5000 residential units, and a population of 6300-8700 would create a wholly separated and isolated business and residential center. In spite of the expansive, unsupported rationale in the DEIS, any of these 3 alternatives would constitute creation of another small-scale city within Bellevue and are in *direct conflict* with the City's commitment to concentrate growth in the Downtown Subarea. Further, the proposed development is totally unnecessary to meet the City's growth targets as confirmed by the City's Buildable Lands Report and subsequent staff analyses.

1.5 WAC 197-11-060(3)(iii) and WAC 197-11-442(4) state that nonproject proposals should be described in terms of *objectives*, rather than preferred solutions; and discussion of alternatives for a comprehensive plan's EIS for nonproject proposals shall be limited to a general discussion of the impacts of the proposal.

The DEIS does not define or rationalize any specific *objectives* for the Bel-Red project; rather, there are a set of broad, but ill-defined "goals" established by the Bellevue City Council that were not subjected to any public review or input. Although the project has a Steering Committee, the Committee developed no procedures, and spent no time in effectively communicating with Bellevue citizens regarding possible changes in land use within the Bel-Red Corridor, even though, according to the City's operating guidelines for the Committee, they were supposed to "... solicit input from the general public and other key community stakeholders." In addition, there was no opportunity for public scrutiny or comment on the "goals" established by the City Council. Moreover, Committee membership was established in camera by the mayor and the deputy mayor, with no input from the other members of the City Council. Indeed, none of the Committee members live in reasonable proximity to the project area¹, and since they did not seek input from the general public, especially homeowners in nearby residential

¹ The only committee members who could possibly be considered as 'reasonably close' to the study area are Pat Sheffels and Laurie Tish; Ken Schiring lives to the east of the area, but a good two miles from the area's centroid. The rest of the committee members live many miles from the area; two of the original members were not citizens of Bellevue. None of the people on the committee have any background or technical training in urban land-use planning, and certainly know very little or nothing about the technical or economic aspects of high capacity transit systems, especially those proposed by Sound Transit. Membership in a City commission is no substitute for formal education, training and work experience in these two complex areas. Thus, with only the inputs from the City's consultants to go on, and with no known/reported contact with Bellevue citizens or organized groups regarding the City's proposed rezone and light-rail route through the project area, it is difficult to understand how the committee members could possibly have formulated any balanced, informed land-use and transit concepts for the area.

4

Responses

1992 to 2012, which is nearly over. The current planning horizon for the City and County, based on updated targets, is 2002 to 2022. The time horizon for the Bel-Red Corridor Project is 2030, a period out to which the City or County have not established housing and employment targets yet, but to which they will in the next few years.

The primary purpose of buildable lands statutes (RCW 36.70A.215) is to require jurisdictions planning under the state Growth Management Act (GMA) to report on their progress meeting the intent of growth management by having these jurisdictions evaluate whether development is occurring in a way that is consistent with their adopted comprehensive plans. Cities and counties must produce an updated land supply inventory and evaluate the adequacy of development capacity of the land supply to meet future growth projections in housing and employment.

The Bel-Red Corridor Project is driven by a number of reasons (as articulated in the City Council Bel-Red Corridor Planning Principles), not just a potential need to update land use densities in the corridor to accommodate future targets, although that is likely to be the case as the City adjusts its targets, along with other jurisdictions in the region, to 2030 and beyond.

David Plummer-19a

The City Council established a principle at the beginning of the project that future land uses in the Bel-Red Corridor should complement, not compete, with land uses in Downtown Bellevue. Even the most aggressive development program assumed in the DEIS (and reflected in the FEIS) will not challenge Downtown Bellevue's role as the City's major growth and employment center. For the period 2002 to 2022 (the current target horizon), it is assumed that 28,000 new jobs and over 8,000 housing units will be added to Downtown—

Comments

Responses

1.5, continued

24 areas, the Committee's influence on developing alternatives for the Bel-Red Corridor has consisted primarily of endorsing Staff and consultant recommendations. *In their deliberations, the Committee never solicited input or presentations that might have refuted the inputs received from the City's consultants. It is equally troubling that the Committee never discussed, or asked the staff to discuss the implications (for the Bel-Red Project) of the City's Buildable Lands Report.*

25 1.6 The DEIS mentions (page 1-3) that employment in the Bel-Red corridor has declined during one short period (1995-2004). City staff has asserted that the Bel-Red area has declining employment, *but only data for 1995, 2003 and 2004 were analyzed by the staff. Staff analysis of 2004 PSRC data shows total employment in the Corridor has recovered; staff analyses also project that Bel-Red employment will grow to about 32,500 by year 2030: see Tables E49-1 and E49-2; Table E49-X2 shows PSRC employment estimates for FAZ 5205 (the FAZ that includes the Corridor). In addition, employment estimates and (PSRC) forecasts are subject to considerable uncertainty; thus, the limited evaluation of available employment information cannot possibly be used as a compelling reason to rezone the land in the Bel-Red Corridor.*

26 1.7 Text on page 1-4 of the DEIS indicates that, in 2005, the City began " ... working with businesses and residents to develop a long-range plan for future land uses in the corridor and to determine the area's role in the city's overall growth and economic development." The asserted objective of this effort was " ... to work with the community to plan and manage change rather than to accommodate the inevitable change in a haphazard, piecemeal way." Both of these statements are manifestly inaccurate at best, and seriously misleading; consider the following regarding participation of businesses and residents in the project:

(a). Neither the City staff nor the Steering Committee made any *serious* effort to obtain broad citizen input on the City's plan for intensifying the land use in the Corridor. For example, at the Project's SEPA scoping meeting, only approximately 40-50 persons attended. At the meeting the City did not allow attendees to make comments to the assembled group; instead, the attendees were broken into small groups that were 'guided' by staff members with a pre-arranged set of questions;

27 (b). There are approximately 1600 businesses in corridor, but only 40 participated in stakeholder interviews conducted by a City consultant (August 2005); and approximately 30 participated in the Project 'open house' (March 2006). Small groups of business/property owners were invited to separate meetings (4 meetings on 16 May and 3 on 6 June 2006); 37 persons attended the 16 May meetings; 30 persons attended the 6 June meetings; some persons attended 2 or more of the meetings; the public could attend the meetings as observers, but not make comments; few or no members of the Steering Committee attended these meetings;

28 (c). No business/property owners in Bel-Red Corridor are members of the Steering Committee, especially those owners along the southern edge of the Corridor. In addition, no homeowners on the southern edge of the Corridor were members of the Committee;

29 (d). Neither City staff nor the Steering Committee invited Bel-Red business/property owners to make presentations to the Committee on their development

5

far exceeding any future development estimates for Bel-Red. In addition, none of the action alternatives analyzed in the DEIS contemplate building types and an urban form that is currently permitted in Downtown Bellevue.

David Plummer-20a

Comment noted.

David Plummer-21a

See responses to Bridle Trails Community Club-2 and -3. Significant public outreach and involvement has been a hallmark of the Bel-Red Corridor Project and is documented in Chapter 1 and Appendix B of this FEIS. All Steering Committee meetings have been, and will continue to be, open to the public, and members of the public have submitted comments to the committee both orally and in writing through the course of the project. In addition to committee meetings, there have been numerous other community meetings, and meetings focused on receiving input from business and property owners in the area. Through the process, the committee has received a broad range of input, and has used this, as well as their own understanding of the area, to oversee development of the alternatives evaluated in the DEIS and the Preliminary Preferred Alternative.

David Plummer-22a

Comment noted.

David Plummer-23a

Comment noted.

David Plummer-24a

See response to David Plummer-21a

Comments

**Table E49-1. Bel-Red Corridor Major NCAIS Employment
1995 and 2003**

Type of Employment	Total Estimated Employment for Years and Type of Employment			Percent Change	
	1995 (Source: 1)	2003 (Source: 1)	2004 (Source: 2)	1995-2003	2003-2004
Construction	1,726	1,468	1,562	-14.9%	6.4%
Manufacturing	1,661	1,536	2,143	-7.5%	39.5%
Retail	2,476	2,734	3,588	10.4%	31.2%
Wholesale/Transp./ Ware.(WTU)	3,530	2,316	1,107	-34.4%	-52.2%
FIREs	958	1,155	1,793	20.6%	55.2%
Services	7,829	7,770	5,942	-0.8%	-23.5%
Government	563	281	9	-50.1%	-96.8%
Total Employment	18,743	17,260	19,000	-7.9%	10.1%

Source:

1. PSRC data provided to Bellevue for 1995 and 2003.
2. 2004 data from infoUSA, Inc.; total adjusted per staff memo (K. O'Neill and K. McDonald to Bel-Red Steering committee) dated 24 February 2006.

Note: According to the staff memo, separate PSRC data in possession of the staff shows that total **covered** employment in the Corridor is about 1100 businesses with 19,000 jobs. **Total** employment tends to be 10-15% higher, giving a total 2004 employment estimate for the Corridor of at least 21,000.

Responses

David Plummer-25a

Page 1-3 of the DEIS states that between 1995 and 2004 employment declined in the Bel-Red Corridor while increasing by 20 percent in Bellevue as a whole. Specifically, covered employment in the corridor was estimated by the Puget Sound Regional Council (PSRC) to be 19,918 in 1995, 18,774 in 2003, and 18,411 in 2004. This signals that in the recent past, economic development generally has not been as vigorous in the corridor as in the balance of the city.

Data used in the DEIS for forecasted employment for Bellevue and King County for the year 2030 came from PSRC's 2003 *Small Area Forecast* (which was updated in 2004). Table 8-4 in the DEIS shows projected new employment in the Bel-Red Corridor for the 2030 planning horizon for the No-Action Alternative as well as action alternatives. King County averages of employment by land use type (King County, 2002), were used to estimate the projected additional employment in the Bel-Red Corridor for each action alternative for the 2030 horizon year.

As shown in Table 8-4 of the DEIS, the City projects an increase of about 2,400 new onsite employment for the No-Action Alternative. Thus, while this figure is lower than that projected for the action alternatives analyzed, the DEIS acknowledges that modest growth in employment would likely occur under the No-Action Alternative.

David Plummer-26a

See response to David Plummer-21a.

David Plummer-27a

See response to David Plummer-21a.

Comments**Table E49-2. Employment In Bellevue and Bel-Red Corridor (NCAIS-Classified Jobs) For Selected Years**

Location	Employment for Bel-Red and Bellevue in Years			
	1995	2003	2004	2030
Bel-Red	18,700	17,300	19,000	32,500(est.)
Bellevue	93,500	110,800	109,500	186,800(est.)

Source: PSRC data and estimates of Bellevue City staff (values rounded), Fall, 2006.

Notes:

1. Per PSRC, actual/total employment tends to be 10-15% higher.
2. No comprehensive/definitive/long-term analysis of Bel-Red Corridor actual employment exists due to fragmentary data base.
3. Minor fluctuations in employment levels (in City and Bel-Red) are normal; long-term trends not reliable based on a few data points.

Responses**David Plummer-28a**

See response to Alan Car-11c.

David Plummer-29a

See response to David Plummer-21a.

Comments

Responses

Table E49-X2. PSRC Employment Estimates for FAZ 5205, 2000, 2004, 2005

Geocoded		Covered		Total	
		Factor Set 1		Factor Set 2	
Year 2000					
PSRC CATEGORIES	JOBS00				
Const/Res	2,291	Const/Res 1.080	2,474	Res/Con 1.283	3,175
FIRE	1,892	FIRE 1.053	1,993	FIRE 1.108	2,209
Manufacturing	2,272	Manufactur 1.014	2,304	Manuf 1.033	2,380
Retail	2,951	Retail 1.061	3,131	Retail 1.177	3,496
Services	14,320	Services 1.136	16,271	Services 1.145	18,637
WTU	2,989	WTU 1.075	3,212	WTU 1.118	3,591
Education	38	Education 1.000	37	Edu 1.000	37
Government	685	Government 1.010	691	Gov 1.000	691
TOTAL	26,753		29,422		33,525
W/O Const/Res	24,462		26,948		30,350
Year 2004					
PSRC CATEGORIES	JOBS04				
Const/Res	1,553	Const/Res 1.081	1,680	Res/Con 1.288	2,156
FIRE	1,931	FIRE 1.040	2,008	FIRE 1.108	2,226
Manufacturing	1,611	Manufactur 1.022	1,646	Manuf 1.033	1,700
Retail	2,375	Retail 1.030	2,446	Retail 1.177	2,731
Services	12,689	Services 1.094	13,881	Services 1.145	15,900
WTU	2,908	WTU 1.080	3,140	WTU 1.118	3,511
Education	38	Education 1.017	39	Edu 1.000	39
Government	802	Government 1.013	813	Gov 1.000	813
TOTAL	23,907		24,840		28,263
W/O Const/Res	22,354		23,160		26,107
Year 2005					
PSRC CATEGORIES	JOBS05				
Const/Res	1,748	Const/Res 1.081	1,890	Res/Con 1.283	2,426
FIRE	1,625	FIRE 1.040	1,690	FIRE 1.108	1,873
Manufacturing	1,772	Manufactur 1.022	1,811	Manuf 1.033	1,871
Retail	2,528	Retail 1.030	2,604	Retail 1.177	2,907
Services	12,723	Services 1.094	13,918	Services 1.145	15,942
WTU	2,792	WTU 1.080	3,015	WTU 1.118	3,371
Education	38	Education 1.017	39	Edu 1.000	39
Government	772	Government 1.013	782	Gov 1.000	782
TOTAL	23,998		24,967		28,429
W/O Const/Res	22,250		23,077		26,003

Source: Communication, RSRC to DF Plummer, 9 March 2007.

Comments

Responses

1.7 (d), continued

concepts/plans or concerns, and *citizen presentations to Steering Committee were neither solicited nor permitted*; and,

(e). The only opportunity for lay citizen input at Steering Committee meetings was at the end of the meetings, and subject to a 3-minute time limit for each individual.

The second statement above ("... accommodate ... change in a haphazard, piecemeal way.") implies that the City's entire planning/zoning processes and procedures would allow developments initiated by Corridor property owners to occur with little or no control, influence or oversight by the City or concerned citizens. *This implication is totally fallacious*, as the City's planning/zoning procedures are regularly used to consider and evaluate proposals by property owners for changes to land use or zoning, by the City to develop parks and other public amenities, etc. *Such changes may occur in a piecemeal fashion, but, if approved, they are neither haphazard nor do they require support from such grandiose schemes as embodied in the City's plan to rezone the Bel-Red Corridor in a manner preferred by City staff.*

The fact that such (property-owner-initiated) proposals for individual properties might be advanced in a manner and with timing preferred by the property owners does mean that future developments in the Corridor would be less desirable, or economically/financially less efficient than developments contemplated by Alternatives 1, 2, or 3. Indeed, individual property owners undoubtedly possess better information/data to base their development proposals on than does the City. Moreover, the information provided to the City and Steering Committee for the Bel-Red Project by the City's consultants was very superficial, and little more than one-time snap-shots of various development vectors and scenarios for the Corridor. *None of these 'snap-shots' in any way reflected a comprehensive input from Corridor property owners, from a broad range of citizens in the City, or from carefully prepared, documented analyses.*

To illustrate the poor quality of the 'data' used by the Staff to prepare this DEIS, and by the Steering Committee to endorse Staff-recommended development options, consider the report by Leland Consulting (reproduced in Appendix B the DEIS):

(a). Task 1.3 of Leland's "Scope-of-Work" required the consultant to analyze historical and projected demand through 2010, 2020, and 2030 for various land uses in the Project study area, specifically for office, industrial, retail, and multi-family uses. The consultant did not provide data that shows compliance with this Task, and only limited information can be derived from Tables 5 thru 8 of Leland's report; only Table 8 shows projected demand (for hotel space) in 2030;

(b). Task 1.4 of Leland's "Scope-of-Work" required the consultant to make qualitative judgments about future demand for such specialized uses as Grade A office space, back-office space, laboratory and medical uses, service office and industrial space, warehouses, auto-related uses, specialty retail, local-serving retail, hotel and hospitality, local-serving retail and restaurant, and destination and comparison retail. There is no evidence in the consultant's report that he developed demand projections for all these uses; and,

(c). Task 2.3 of Leland's "Scope-of-Work" required the consultant to analyze "... the likely future of the study area if there are no significant changes in zoning or transportation improvements, or no major initiatives on the part of the City." The consultant responded to this requirement with two short paragraphs (page 17 of his report), and made no effort to seriously examine possible development vectors based on

David Plummer-30a

Comment noted.

David Plummer-31a

Comment noted. The direction to undertake this comprehensive planning effort and fund it is provided by the City Council.

David Plummer-32a

Comment noted.

David Plummer-33a

See response to David Plummer-21a.

David Plummer-34a

The Leland Consulting report did outline ranges of future demand for office, housing, retail, and other uses in the corridor between 2006 and 2030, the time horizon of the Bel-Red planning effort. These projections were based on forecasts prepared by the PSRC analysis of historic office absorption rates, stakeholder interviews, demographic analysis, and other methods employed by the consultants.

David Plummer-35a

Comment noted.

David Plummer-36a

The consultant's findings about the future development potential of the area under no action was based on stakeholder interviews, analysis of past economic performance in the corridor, projected demand for uses (particularly office and housing), and other factors.

Comments

Responses

1.7, continued

the many uses allowed in the Corridor by present zoning (see Tables 1 and 2, and Figure 1, above). The DEIS should be extensively revised to more accurately describe the limited amount of input the City received from citizens and business/property owners, and the limited, unsubstantiated, and unchallenged work done by City consultants. The DEIS should also disclose more accurately why the City is proposing to intensify the zoning in the Corridor; *the reasons provided in the DEIS are totally inadequate to justify such an expensive, complex, and long-running study effort, or the extremely intense, very high cost alternatives.* At the same time, the pejorative/incomplete characterization of normal 'evolutionary' developments that might occur in the Bel-Red/Northrup subarea (under the No-Action alternative) should be revised, as it tends to lead DEIS readers to conclude that such development would result in less desirable, less efficient outcomes than those favored by the City. *If the City has specific data/analyses to show that its plan for the Bel-Red Corridor would be demonstrably better (in some sense) than allowing development to occur based on property-owner proposals in response to their perceptions of evolving market demands, this data/analysis should be added to the DEIS in the form of an extensive appendix. In addition, if the City believes that its zoning/planning procedures are not adequate to properly control evolutionary development of property-owner proposed developments in the Corridor, this should be disclosed in the DEIS so that citizens can better understand the City's rationale for the Project.*

2. COMMENTS SPECIFIC TO INDIVIDUAL CHAPTERS

2.0 Chapter 1

2.0.0 Table 1-3 (watershed processes) improperly states that water-quality and habitats under the No-Action Alternative would continue to degrade over time. Why would the City allow this to happen under this alternative since the City is committed to improving streams and fish habitat in the City's stream systems? *The same opportunity for improving stormwater management and improving habitats will be present for the No-Action alternative as for the Action alternatives.*

2.0.1 The assertion in Table 1-3 (noise) that sound/noise levels near major arterials for all alternatives would be same is totally fallacious, and unsupported by information/analyses in Chapter 5 of the DEIS, as only three intersections were evaluated by predicted noise contour plots; and none of the noise contour plots are based on empirical measurements/data. Further, the noise evaluation failed to include impacts of Sound Transit's LRT line through the Corridor, or along SR-520. Also, the traffic analysis in Chapter 10 does not explain why the predicted PM 2-hour, bi-directional traffic counts on almost all roads is virtually identical among the 4 alternatives for 2030. In addition, if the predicted sound/noise levels are the same, why would some mitigation measures not be assumed for the No-Action alternative?

2.0.2 The assertion in Table 1-3 (environmental health) that there would be limited redevelopment under the No-Action alternative is incorrect: it is very likely that substantial redevelopment and property improvement would be

7

David Plummer-37a

See response to David Plummer-21a.

David Plummer-38a

Comment noted.

David Plummer-39a

Comment noted.

David Plummer-40a

Without incentives for additional stormwater control, this area would experience continued urban runoff pressures. The effects of traditional urban runoff on the environment have been well documented by research at the University of Washington, including work by Derek Booth and Chris May. Even with existing City of Bellevue stormwater facilities in the Bel-Red Corridor, environmental degradation from existing development persists.

David Plummer-41a

Predicted noise levels were based on anticipated traffic volumes under each of the action alternatives. The intersection locations for noise modeling were chosen because they would be close to potential sensitive noise receivers (primarily residential areas) under one or more of the action alternatives. Because future conditions (such as topography and building height) are not yet known at these locations, using representative contours is an acceptable method for modeling. This approach is routinely used by the Washington State Department of Transportation and the Federal Highway Administration for predicting noise levels. See response to Peter Mears-3.

Comments

Responses

2.0.2, continued

proposed/accomplished by property owners if none of the Action alternatives are adopted. Indeed, many properties have been improved or redeveloped in the Corridor over the last several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9.

46 2.0.3 The assertion in Table 1-3 (land use) that future land uses under the No-Action alternative would not be compatible with the City Council's 'planning principles' for the Corridor is totally unsubstantiated by any analyses, data, or study reports. *Rather, the No-Action alternative is almost wholly compliant with all ten of the City Council's 'planning principles' for the Corridor as shown in Table 5. Further, future proposals by property owners in the Corridor for rezones, and other land-use changes are to be expected under the No-Action proposal; this type of activity has occurred in many areas of the City in the past, and will undoubtedly continue into the future.*

47 2.0.4 The assertion in Table 1-3 (recreation) that there would be no additional recreational facilities in the Corridor is incorrect. There are number of parcels of undeveloped land in the Corridor, and a rather extensive stream system. Since the City is committed to protecting and enhancing its streams and habitat areas, it is likely that protective/enhancement measures for the stream system in the Corridor could be proposed by the City under the No-Action alternative, and could easily include open spaces with public access.

48 2.0.5 The information given in Table 1-3 (population, housing, and employment) is incorrect: data and analyses of the City of Bellevue and PSRC show that the Corridor's employment in 2004 was about 19,000; forecasted employment for 2030 is estimated to be about 35,000: see Tables E49-1 and E-49-2, above.

49 2.0.6 The summary of the traffic impacts given in Table 1-3 (transportation) is not credible: if the Action Alternatives add approximate 6300-8700 persons to the Corridor vis-à-vis essentially none under the No-Action alternative, how could the traffic average speeds, intersection LOS values for the Action Alternatives be in any way comparable? Also, the two LRT stations for the No-Action alternative are located at the west and east boundaries of the Corridor, not " ... in ... " the Corridor as stated in Table 1-3.

50 2.0.7 The impacts on public services and utilities (summarized in Table 1-3) are not adequately defined. Adding 6300-8700 residents (under the Action alternatives) to the Corridor will create *significant* demand for increased fire and police protection at considerable cost. Also, because of increased traffic congestion under the Action alternatives, emergency vehicle access (for fire, police, and other emergency responses), especially to nearby residential areas, would not be improved (vis-à-vis the No-Action alternative), and there is no analysis in the DEIS to show that this assertion is

8

David Plummer-42a

See response to Sound Transit-10a. The impacts of Sound Transit's light-rail project will be analyzed separately in an EIS to be prepared by Sound Transit.

David Plummer-43a

The roadways analyzed for noise impacts were Bel-Red Road, 140th Avenue NE, Northrup Way, 124th Avenue NE, 130th Avenue NE, and NE 16th Street. The comment was made that there was no explanation given as why the traffic volumes on each of these roadways is "virtually identical" amongst the alternatives. For both Bel-Red Road and Northrup Way, traffic volumes would increase only slightly over the No-Action Alternative because a parallel route, NE 16th Street, would be constructed to accommodate most of the new growth associated with each action alternative. As for 140th Avenue NE, the lack of growth projected at this location is mostly attributed to the fact that 140th Avenue is nearing capacity and cannot accept new growth in traffic. In addition, most of the concentration of new land uses for each action alternative was intentionally distributed west of approximately 134th Avenue NE knowing that the existing transportation system east of 134th Avenue NE is already nearing or at capacity. Regarding 124th and 130th Avenues NE, Chapter 10 documented significant growth in traffic volumes on both of these corridors for nearly all the action alternatives (see page 10-24 in the DEIS).

David Plummer-44a

No mitigation measures are assumed under the No-Action Alternative because no improvements are proposed. The noise levels shown for No Action are based on what existing conditions would be in 2030 given a continuation of existing land uses and transportation networks in the corridor.

Comments

Responses

Table P9. Property Sales In Bellevue Area 80-050 and -060 (Overlake), and 80-70 (Midlakes), 2003-2006

Area	Zoning	Sales in Year			
		2003	2004	2005	2006
80-050	O - Office		1	5	
	PO - Prof. Off.		3	1	
	GC - Gen. Com.	1	1	3	
	CB - Com. Bus.		1	2	
	LI - Lt. Ind.			1	
80-60	O - Office				
	PO - Prof. Off.				
	GC - Gen. Com.				
	CB - Com. Bus.				
	LI - Lt. Ind. R-20 Apt.		1		
80-70	O - Office	2	5	4	
	PO - Prof. Off.	1	2		
	GC - Gen. Com.		1	3	1
	CB - Com. Bus.				
	LI - Lt. Ind.	1	4		
Totals					
O - Office		2	6	9	
PO - Prof. Off.		1	5	1	
GC - Gen. Com.		1	2	6	1
CB - Com. Bus.			1	2	
LI - Lt. Ind. R-20 Apt.		1	4	1	
Total for Year		5	19	19	1

Source: King Count Assessor Report for Bellevue Area 80; King County; Seattle, WA. April, 2006

David Plummer-45a

The reference to limited redevelopment under the No-Action Alternative does not refer to the corridor as a whole. It means that little development is anticipated in the development node around the one station proposed under No Action. The current zoning in that area – which would continue under No Action – is not supportive of the types of higher-density land uses that typically are attracted to transit station areas.

David Plummer-46a

See response to David Plummer-12a.

David Plummer-47a

The City could acquire property for recreational purposes in the Bel-Red Corridor, though there are no current plans to do so.

Any redevelopment proposed under the No-Action Alternative would be required to follow current city stream setback requirements, which may incrementally increase the buffer widths along the stream corridors over time.

David Plummer-48a

See response to David Plummer-25a. The statements about additional employment in Table 1-3 (Summary of Impacts and Mitigation Measures for Bel-Red Corridor Alternatives) reflect the projection methodology described in that response.

David Plummer-49a

The comparable average speeds and intersection level of service (LOS) results of the action alternatives to the No-Action Alternative is possible given the very different transportation capacity assumptions for the action alternatives. It is important to realize the action alternatives include capacity improvements as outlined in Table 10-5 and

Comments

Responses

Table 5. Compatibility of No-Action Alternative With City Council Planning Principles

Principle No.	Description	No-Action Alternative Compatibility With Principle
1	Long- term vision; ambitious; realistic; clear direction	<i>Unknown.</i> business/property owners were never asked for their combined or individual visions; however, some business owners (e.g., Coca Cola, auto repair, etc.) expressed their intention to remain in the area under present zoning.
2	Economic vitality; solid and dynamic economic future	<i>Yes:</i> there are currently approximately 1600 businesses in the corridor; the wide variety of permitted uses under current zoning , and possible future changes insure a solid economic future.
3	Differentiated economic niche; provide for future growth of business activity not well accommodated in other parts of the City.	<i>Yes:</i> current zoning provides for wide diversity of service and other unique businesses, especially those in the light industrial area; possible future uses under present range of permitted uses, and possible rezones, imply a secure business and economic future with good employment growth prospects.
4	Build from existing business assets	<i>Yes:</i> there are currently approximately 1600 businesses in the corridor; with normal business and economic activity growth, and potential to exploit permitted uses under existing zoning, or thru rezone activity, the economic and business future of the Corridor is as secure as any other area of the City.
5	High-capacity transit opportunity	<i>Yes:</i> Sound Transit will consider an LRT route parallel to the corridor along SR520; this route is far cheaper than routes thru the interior of the Corridor, and will not consume valuable land that can be used for productive economic and business activity, thus generating more tax revenues and employment opportunities. Expected/future improvements in local bus service will provide adequate transit service at much lower cost. Criteria for LRT station location suggest that a station in the vicinity of 134th NE (for an SR520-parallel LRT route) could be constructed and would serve the Bel-Red Corridor and the Bridle Trails neighborhood to the north of SR520.
6	Land-use/transportation integration; should have good multi-mode transportation subsystem	<i>Yes:</i> with the expected, but not excessive improvements in in the interior road network, LRT service parallel, and close to SR520, and stations at the west and east ends, and improved local bus service, the Corridor can efficiently provide employment growth opportunities. Expected upgrades in existing and limited future arterials to add sidewalks and bicycle lanes will ensure a viable transportation subsystem.

Appendix G that allow for much of the traffic growth associated with the action alternatives to be accommodated, and as a result, there are small differences in the average speed and intersection LOS. A discussion of this effect is presented in the second paragraph on page 10-29 of the DEIS.

David Plummer-50a

See responses to Peter Mears - 11 through 15. Each of the action alternatives would improve vehicular circulation within the study area, which in turn would improve access for fire protection and emergency medical services.

Comments

Responses

Table 5. Compatibility of No-Action Alternative With City Council Planning Principles, continued

Principle No.	Description	No-Action Alternative Compatibility With Principle
7	Community amenities and quality of life; protect existing resources and include new parks and open space	<i>Partially:</i> the existing community center and athletic field at Highland Center would be retained; with only a modest effort by the City, additional recreational and open space provisions could easily be incorporated; in addition, the City's commitment to stream and habitat protection and enhancement would assure that Corridor wetlands would be improved.
8	Protect nearby neighborhoods and provide for future new neighborhoods	<i>Partially:</i> lower intensity development will provide the best protection (vis-à-vis the Action Alternatives) to existing neighborhoods on the north and south boundaries of the Corridor; since the City's Buildable Lands Report shows that no new zoning is required to meet the City's 20-year growth vectors, no new neighborhoods are required in the Corridor.
9	Sustainability; manage corridor natural resources in sensitive, sustainable manner; conserve energy and natural resources	<i>Yes:</i> the No-Action alternative is the least intensive, with lowest burden on energy and natural resources; preserves maximum flexibility for City small-scale initiatives; minimizes impact to surrounding neighborhoods; provides widest diversity of economic/business activity for an enhanced, broad range of new employment opportunities; and is the alternative most compatible with City's commitment to concentrate employment and population growth in the Downtown Subarea.
10	Coordination; coordinate with other affected jurisdictions, Sound Transit, City of Redmond	<i>Yes:</i> this 'principle' was directed at the activities of the Bel-Red Project steering committee. Thus, all of the alternatives would normally be coordinated with nearby cities, with Sound Transit, King County, etc.

Comments

Responses

2.0.7, continued

correct. Also, because of increased traffic congestion on nearby arterials, emergency response to nearby neighborhoods (Rockwood, Bridal Trails, etc.), would deteriorate; this deterioration was not analyzed in the DEIS.

2.0.8 There is no analysis or other data or references in the DEIS to confirm the assertion in Table 1-3 (public services and utilities) that increased demand for electric power/energy, natural gas, and other utility services under the Action Alternatives would not result in significant demands for capacity increases from Puget Sound Energy. Similarly, there is no conclusive analysis that confirms that there would not be significant demand for increased capacity for water, waste water, or solid-waste disposal from these service providers under the Action alternatives.

2.1 Chapter 2

2.1.0 On page 2-1, the City/DEIS asserts that the "... City of Bellevue staff and consultant team developed the action alternatives for the Bel-Red Corridor Project through a structured process ...", including analysis of market conditions, and sought input from the public and property/business owners. These assertions far overstate the amount of analysis and degree of input from the public and business/property owners. In fact, the analyses done by the City's three principal consultants were superficial, and heavily influenced by the staff's biased commitment to intensify the land-use and zoning in the Corridor; this can be clearly seen in the statements of work for the City's three principal consultants (available from the City of Bellevue through their public-records-request procedures).

During the process of revealing the City's pre-conceived notions for redevelopment of the Corridor through public meetings and the Bel-Red Steering Committee meetings, only limited input was obtained from the public: see Table M4. In addition, the Steering Committee only allowed public comments (usually at the end of their meetings), and only allowed speakers a 3-minute 'window' for their comments.

Leland Consultants was required to meet with "stakeholders and others ...", and with Sound Transit to obtain information on plans, opportunities, and constraints on redevelopment in the Corridor. In fact, Leland interviewed or contacted by telephone, only 41 persons in response to this requirement (see Table L56); it is not known whether Leland met with representatives of Sound Transit. However, the City estimates that there are approximately 1500 businesses in the Corridor, so Leland only contacted less than 3% of the business owners. In the 1 August 2005 briefing to the City Council on the project, the City's Planning & Community Development Director told the Council that prospective 'stakeholders' included not only current land owners and tenants in the area, but also "(r)esidents and residential property owners within and adjacent to the subarea, (i)ncluding all community and neighborhood associations." This same representation was made to the City's Transportation Commission on 1 September 2005. However, LCG did not interview any residents or community/neighborhood associations. Thus community/neighborhood associations in nearby areas were prevented from making their views known to the City's consultant, and, subsequently, to the Committee.

Leland made no contact with individual property owners in the various residential neighborhoods surrounding the Corridor, nor did they meet with any of the City's neighborhood associations. And the staff made no serious effort to contact individual citizens or homeowner

David Plummer-51a

As stated in the DEIS, Bellevue forecasts water supply inlet capacity and drinking water storage deficiencies in the West Operating Area (OA), with surplus storage and sufficient inlet capacity for the East OA, even with the No-Action Alternative. The Bel-Red Corridor project area includes portions of both OAs. Increases in allowed land use density will result in higher demand forecasts to the water system to support the additional employment and population growth. The storage needs may be met or partially met by increasing transmission capacity between the west and east OAs, or by constructing additional storage. New supply inlets or improvements to existing inlets will be needed eventually for all alternatives. No wastewater capacity improvements have been identified as needed at this time. However, required capacity will be calculated based on the recommended land use; options for specific improvements will be identified once the demand is quantified, as part of ongoing comprehensive planning.

Increased demand is not an issue for solid waste collection. Bellevue's contractor is a private business that could accommodate the increased revenue. However, from a disposal perspective, there would be some, albeit presumably very minor, impact on the County disposal system. Capacity does exist for final disposal (landfilling). See response to Peter Mears-13.

David Plummer-52a

See response to David Plummer-21a.

David Plummer-53a

See response to David Plummer-21a.

Comments

Responses

Table M4. "Public" Involvement In Bel-Red Corridor Project

Meeting Date	Type of Meeting/Other	Est. No. of 'Pub.' Attendees	No. of Public Comments	Comments
8-Aug-05	Interview via telephone or in meeting	40	0	Interviews of so-called "stakeholders" by Leland Consulting Group prior to start of Project
27-Oct-05	Steer. Comm.	5-10 (?)	0	
9-Nov-05	Public Workshop (EIS Scoping Mtg)	25-40 (?)	N/A	Attendees were organized into small groups and responded to scripted questions from Staff; no opportunity for public comments to entire group.
1-Dec-05	Steer. Comm.	10-15 (?)	1	
19-Jan-06	Steer. Comm.	10-15 (?)	1	
2-Feb-06	Steer. Comm.	10-15 (?)	2	
2-Mar-06	Steer. Comm.	10-15 (?)	4	
6-Apr-06	Steer. Comm.	10-15(?)	7	
18-Apr-06	Open House	25-30 (?)	0	Attendees wandered around room and made comments to staff.
4-May-06	Steer. Comm.	10-15(?)	0	Special meeting of Steer. Comm. for business and property owners
16-May-06	Series of 4 Bus. & Prop Owner Panels	3-5(?)	0	Public could attend, but not participate or comment.
1-Jun-06	Steer. Comm.	15-20(?)	3	No 'map' of no-action alternate.
6-Jun-06	Series of 3 Bus. & Prop. Owner Panels	3-5(?)	0	Public could attend, but not participate or comment.
8-Jun-06	Public Meeting	40-60 (?)	32 Questions	Written comments ??
12-Jun-06	Steer. Comm.	10-12(?)	0	No public comments permitted

Source: Meeting minutes for number of comments; attendance estimated.

David Plummer-54a

Comment noted. The intent of the stakeholder interviews for the Leland market/economic analysis was to get a sense from business interests specifically on their impressions of the market and market trends in their area. This is standard procedure in economic analysis of this type and was included in the consultant's scope of work.

David Plummer-55a

Comment noted.

Comments

Responses

Table L56. List of Persons Interviewed at "Stakeholder Discussions,"
Bellevue Doubletree Inn, 18 August 2005

First Name	Last Name	Organization	Address	City
TJ	Woosley	Hal Woosley Properties	12001 NE 12th	Bellevue
Scott	Coombs	Harsch Investm't Properties	13010 NE 20th St	Bellevue
David	Schooler	SRO	800 106th Ave NE # 200	Bellevue
Janet	Donelson	Overlake Hospital	1035 116th NE	Bellevue
Pete	Hollomon	CB Richard Ellis	110 110th NE	Bellevue
Mark	Rowe	Opus NW	118th Ave. SE, Ste 300	Bellevue
Scott	Evans	Evans Company	1457 130th NE	Bellevue
Jorge	Gonzalez	Barrier Motors	14600 NE 24th	Bellevue
Michael	O'Brien	Lexus of Bellevue	11058 Main St.	Bellevue
Greg	Pardee	Acura of Bellevue	13424 NE 20th.	Bellevue
Elizabeth	Stoner	Overlake Fashion Plaza	2130 148th NE	Redmond
Don	Pickens	Sherwood Shopping Ctr.	NE 20th&156th	Bellevue
Tomis	Moriguchi	Uwajimaya	NE 24th St. &	Bellevue
Fred	Reiningger	First Mutual Bank	400 108th NE	Bellevue
Jeff	Seely	ShareBuilder Corporation	1445 120th NE	Bellevue
Lane	Staples	Unigard Insurance Group	15805 NE 24th	Bellevue
Larry	Delfiner	Lexis-Nexis	13427 NE 16th Stree	Bellevue
Stacy	Graven	Meydenbauer Center	11100 NE 6th St	Bellevue
Robert	Fellows	King County Metro	?	Seattle (?)
Keri	Stout	Bellevue Family YMCA	14230 Bel-Red	Bellevue
Richard	Leider	Bellevue Downtown Assoc.	500 108th Ave NE # 210	Bellevue
Dave	Sharp	Legacy Commercial	400 112th NE	Bellevue
Walter A.	Scott	Legacy Commercial	400 112th NE	Bellevue
Kenneth D.	Graham	Overlake Hospital	1035 116th Ave NE	Bellevue
John	McPeak	Unigard Insurance Group	15805 NE 24th	Bellevue
Leslie	Lloyd	Bellevue Downtown Assoc.	500 108th Ave NE # 210	Bellevue
James	Barrier	Barrier Motor Group	14600 NE 24th	Bellevue
Helen	Russell	Barrier Motors	14600 NE 24th	Bellevue
Jerry	Sharkey	Lexis-Nexis	13427 NE 16th	Bellevue
Robert	Currey-Wilson	Fred Meyer	2041 148th NE	Bellevue
Roger	Hansen	Sound Transit		Seattle
Craig	Suhbien	SUHRCO Management	10655 NE 4th St	Bellevue
Thomas	Harold	Coca-Cola	Bel-Red & 120th NE	Bellevue
Eric	Nichols	Nickols Realty	14341 NE 21st St # E	Bellevue
Josephine	Tamayo-Murray	Catholic Comm. Services	12828 Northup Way # 100	Bellevue
Dan	Lassiter	Highland Community Ctr.	Bel-Red & 142nd NE	Bellevue
Terry	Wirth	Colliers International	10900 NE 4th	Bellevue
Beth	Quartarolo	Hewlett Packard	3380 146th PL SE	Bellevue
Scott	Evans	Evans Company	1457 130th NE	Bellevue
Joan	Wallace	Wallace Properties	330 112th NE	Bellevue
Beth	Quartarolo	Hewlett Packard	3380 146th PL SE	Bellevue
Terry	Pollard	Bellevue Family YMCA	Bel-RD & 142ndNE	Bellevue

Source: List of names and organizations provided by Leland Consulting Group to City; addresses added by author.

Notes: 1. Some of the individuals listed did not attend the interview session at the Doubletree Inn and were contacted by telephone.

Comments

Responses

2.1.0, continued

associations in preparing alternative development concepts for the Bel-Red Corridor. According to one of the staff's project leaders, the City sent a notice (in May 2006, staff does not remember the date) to 23 of the City's 77 home-owner/neighborhood associations offering to make some sort of presentation to them on the project. Apparently, there was no response to the City's offer, no surprise since 6 of the associations are inactive, only 1 of the associations was within the Corridor, and only 3 or 4 are reasonably close to the Corridor; there was no follow-up by the staff to solicit input from the associations. **More important, there was no effort to organize any panels of lay citizens and/or homeowner associations comparable to those organized for the area's property and business owners.** In addition, the committee's guidelines require the committee to " ... solicit input from the general public and other key community stakeholders..", **but the committee has done nothing to discharge this responsibility.**

The City staff conducted a series of property owner panels during May and June 2006. However, as can be seen in Table M5, only a limited number of property owners participated.

Thus, it is clear that there has not been broad citizen or business/property-owner participation in developing the Action Alternatives in the DEIS. Rather, these alternatives have been almost exclusively developed by the City staff and the City's consultants.

2.1.1 On page 2-1 of the DEIS, the assertion is made that because of increasing land values, manufacturing and warehouse uses have become less economically viable, and therefore, the No Action alternative would " ... likely result in economic stagnation in the Corridor." **This bald assertion is totally unsupported by any documented analysis, and is contrary to any reasonable recognition of the normal evolutionary, market-driven changes to land use, zoning, and property values that would be expected under the No Action alternative. Corridor property owners would, absent the City's grandiose and unjustified plan for the Corridor, respond to future market forces in an informed manner, based on their evaluations of temporal shifts in local and regional markets. Their responses would result in a variety of outcomes: sales of property, redevelopment of holdings, petitions for rezoning, and other outcomes that may or may not coincide with the City's ideas for development of the Corridor. These outcomes would in no way lead to 'economic stagnation,' and would undoubtedly result in greater gains to the property owners and the public than would flow under the City's redevelopment scheme.**

2.1.2 On page 2-1, the City/DEIS asserts that, among other things, the " ... land (in the corridor) is underdeveloped ... and land values have risen significantly in recent years." These assertions are incorrect, and apparently were based on the very limited analysis of the existing building and land conditions in the Bel-Red Corridor performed by Leland Consulting Group. This analysis was largely a 'back-of-the-envelope' snapshot, with little or no recourse to any sort of hedonic or other more comprehensive analyses of past or possible future market demand. Lacking such an analysis, Leland's 'market forecast' is nothing more than an opinion. **Further, there was no analysis or forecast of future market demand by any other consultant.** Contrary to the assertion in the DEIS (page 2-1), Leland's 'analysis' in no way demonstrates that property or land in the Corridor is underdeveloped; indeed, as confirmed by King County's Department of Assessment property records, an their report for Bellevue Area

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David Plummer-56a

Comment noted.

David Plummer-57a

See response to David Plummer-21a.

David Plummer-58a

See response to David Plummer-21a.

David Plummer-59a

See response to David Plummer-21a.

David Plummer-60a

Comment noted. The No-Action Alternative did assume that some growth and redevelopment would occur in the corridor. However, as noted, there has been relatively little economic activity in this area in past years compared to other parts of Bellevue.

David Plummer-61a

Comment noted.

Comments

Responses

**Table M5. Major Landowners In Bel-Red Corridor
and Participation in Owners Panels**

Landowner	Acreage Owned	Percent of Total Bel-Red	Participated in Owner Panels	Remarks
Safeway	74.3	8.3	1 Panel	See Note 4.
Barrier Motors	45.6	5.1	No	
City of Bellevue	26.3	2.9	No	
King County	25.3	2.8	No	
Coca Cola	20.2	2.2	3 Panels	
Brenner Const.	13.2	1.5	No	
Shurgard	12.4	1.4	No	
Fred Meyer	12.1	1.3	No	
Regency Tower Corp.	11.7	1.3	No	
NE 20th St. Propert.	10.7	1.2	No	
F-MAC Highland Pk.	10.4	1.2	No	
Willamette Industries	10.3	1.1	No	
C/O Eproperty Tax, Inc	10.2	1.1	No	
Cadman	9.5	1.1	1 Panel	
JSH Properties	9.4	1	No	
Lowe's	8.5	1	No	
Sternoff	8.5	1	2 Panels	
Robertson Developm't	6.8	0.8	No	
Evergreen Center	6.4	0.7	3 Panels	
Mayer's Group	6.2	0.7	No	
Total	338	37.7		

- Notes: 1. Percentages assume Bel-Red Corridor is approximately 900 acres.
 2. Percentages calculated.
 3. Total number of businesses in Bel-Red Corridor: 1546
 4. City of Bellevue staff directed all panels, but did not provide inputs as a property owner.

Source: List of landowners and acreage: Table 1 from Leland Consulting Group report to City, dated 25 October 2005.
 Landowner participation taken from City of Bellevue meeting minutes, various dates.
 Total number of businesses in Corridor from City of Bellevue memo to Steering Committee, dated 24 Feb 06

Comments

Responses

2.1.2, continued

80 (dated March 2006), land values in Areas 80-50, -60 (Overlake), and -70 (Midlakes) have remained fairly stable, and assessed values for land and improvements for 2006 show a very close correlation to sales prices.

As can be seen in Table 7, and Figures 6.1, 6.2, 6.3, and 8.1, 8.2, and 8.3, improvement ratios, assessed land values, and assessed unit land values in the Corridor have not, with few exceptions, shown any significant changes over the recent past, nor have they exhibited any significant departure from the behavior of similar properties in various areas of the King County. The erroneous information on these statistical parameters in the DEIS should be corrected with a much broader/comprehensive analysis, and a more meaningful statistical analysis by competent organizations, for example, the University of Washington's **Center for Community Development and Real Estate**, keeping in mind that this Center received a pledge from Jon and Judy Runstad for \$1 million, and that the mission of Runstad's firm is, surprise, REAL ESTATE DEVELOPMENT. In any event, it is necessary to obtain some more objective analyses on this issue to replace the blatant bias in the Leland report. Some references are listed in Table X; these references can provide some guidance on how to organize a more informed analysis of speculative land prices.

In addition to the errors noted above, Leland's (and the DEIS's) evaluation (page 2-2 of the DEIS) suggests that the "market conditions analysis" (the conditions are not defined, either in quantitative or dynamic temporal terms, i.e., how market demand for space or use may fluctuate over time in response to changes in exogenous variables - economic conditions, etc.) identified the potential through 2030 for 2.5-3.9 million square feet of office space, 200-400 thousand square feet of added office space, 2500-5000 residential units, and 200-300 hotel rooms.

Regarding Leland's and the DEIS's forecast of office space demand, Leland estimates office absorption of about 100-150 thousand sq.ft. per year from 2000 to 2020 (it is not clear why Leland back-casted his prediction to a starting point 6 years in the past), and 90-135 thousand sq.ft. per year for 2020-2030; no estimates of statistical or temporal variability are given by Leland or the DEIS. The basis or methodology for Leland's forecast is not explained in their report, nor in the DEIS. In addition, there is no reference to office adsorption rates in any other comparable areas. For example, the mean office absorption in the Seattle CBD from 1990 through 2005 was 305,575 sq. ft. per year, with a variance of plus or minus 665,440 sq. ft. per year². While the Seattle CBD office market may not be directly comparable to the Bel-Red Corridor market, the reference report provides a much better view of the type of analysis needed before a decision is made to rezone the Bel-Red Corridor based on an incomplete, and unsubstantiated report such as the Leland report.

Regarding the forecast of demand for retail floor area, the projected retail floor area "demand" (Table 7 of Leland's report) is derived from a tabulation of PSRC population forecasts for 8 FAZs (forecast analysis zones), only two of which are directly applicable to the Corridor. Leland's report states that the 8 zones encompass an area with a 3-mile radius centered at approximately the Bel-Red Road and 130th NE, with the Bel-Red corridor expected to capture

² Reference: Gibbons, A., and M. Gottlieb, "Seattle Central Business District Office Report 2006." Prepared for the Downtown Seattle Association; sponsored by a City of Seattle Office of Economic Development Grant; Seattle, 2006.

David Plummer-62a

Comment noted. Again, as noted in David Plummer-34a, the Leland Group's forecasts were based on several factors: analysis of land/improvement ratios (as of Summer 2005), stakeholder interviews, PSRC employment and household forecasts, and historic absorption data.

The main intent of the analysis was to assess what types of development/land uses would likely be drawn to the area in the future, and in what quantities. The forecast showed a strong future market for office and housing. Subsequent to the forecast, developers and property owners have expressed interest in developing office and housing uses in the corridor, which appears to confirm their conclusions.

David Plummer-63a

Comment noted. See response to David Plummer-62a.

David Plummer-64a

Comment noted. See response to David Plummer-62a.

Comments

Responses

**Table 7. Average Improvement Ratios for Selected Properties,
Bell-Red Corridor**

Parcel No. (Note 6.)	Year 2007 Imp. Ratio Lnd@Ass.Val.	Year 2007 Imp. Ratio, Lnd@\$15/Ft	Avg. Impovm't Ratio for 1991-2007	See Note:	Zoning	Land Area, Acres	Year 2007 Land Assesed Value, \$/sq ft.
9010	0.6026	0.6322	0.4252	1	CB	10.17	\$17
9240	Vacant	Vacant	N/A	-	LI	3.32	\$14
0100	0.3479	0.2991	0.3795	2	LI	60.43	\$12
9007	0.3759	0.3252	0.4380	2	LI	8.14	\$12
9048	0.2669	0.2536	0.4151	3	LI	20.16	\$14
9003	0.7212	0.6915	0.7354	2	LI	3.16	\$13
9087	0.6992	0.6683	0.6265	2	LI	2.89	\$13
9091	0.4359	0.3820	0.4857	4	LI	1.22	\$12
9027	0.6129	0.5964	0.5173	5	LI	1.54	\$14
9063	0.5657	0.6227	0.4860	2	GC	2.01	\$19
9179	0.5762	0.5593	0.5736	2	LI	1.13	\$14
9191	0.6080	0.5914	0.4604	2	LI	1.63	\$14
9297	Vacant	Vacant	N/A	-	LI	4.12	\$20
0009	Park Lot	Vacant	N/A	-	GC	0.63	\$42
9190	0.5281	0.5863	0.5423	2	LI	1.07	\$19
9204	0.6200	0.6036	0.6709	2	LI	3.23	\$14
9066	0.3162	0.3694	0.2734	2	LI	1.09	\$19
9296	Wet Land	Wet Land	N/A	-	LI	7.14	\$13
9295	0.1795	0.1489	0.2196	4	LI	8.43	\$12
9026	0.2146	0.2032	0.2868	4	LI	16.47	\$14
0191	0.8598	0.8307	0.8456	2	GC	2.69	\$12
Averages	0.5018	0.4920	0.4930				\$17

Source: 1. King County Assessor 2007 records for individual parcels for zoning, and land areas.
2. Improvement ratios and unit land assessed values, calculated from Assessor data.

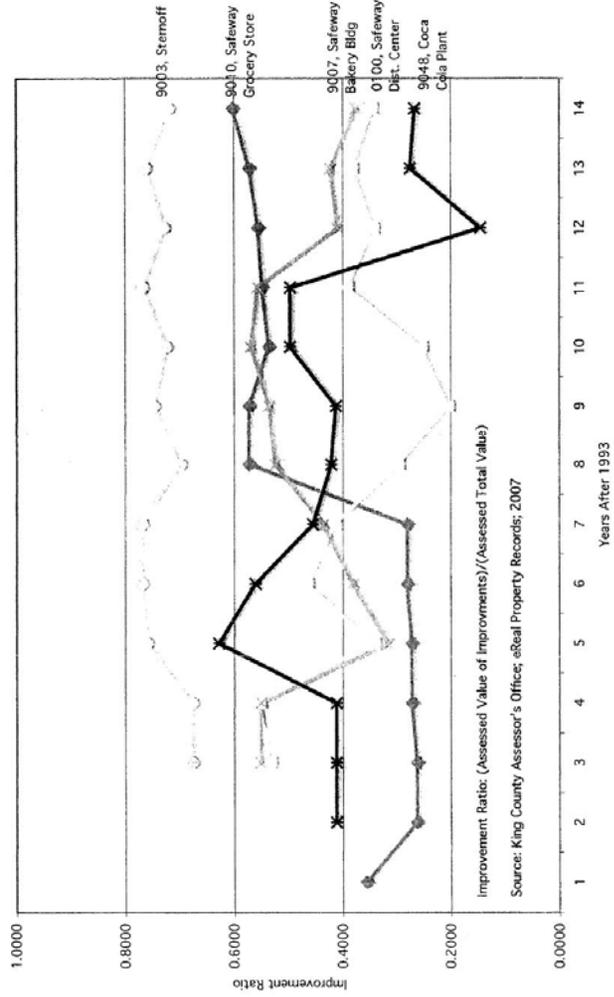
Notes:

1. Average IR value for 1994-2007.
2. Average IR value for 1996-2007.
3. Average IR value for 1995-2007.
4. Average IR value for 1991-2007.
5. Average IR value for 1992-2007.
6. See Figures 6-1, 6-2, and 6-3 for name of parcel and assessed land/improvement values.

Comments

Responses

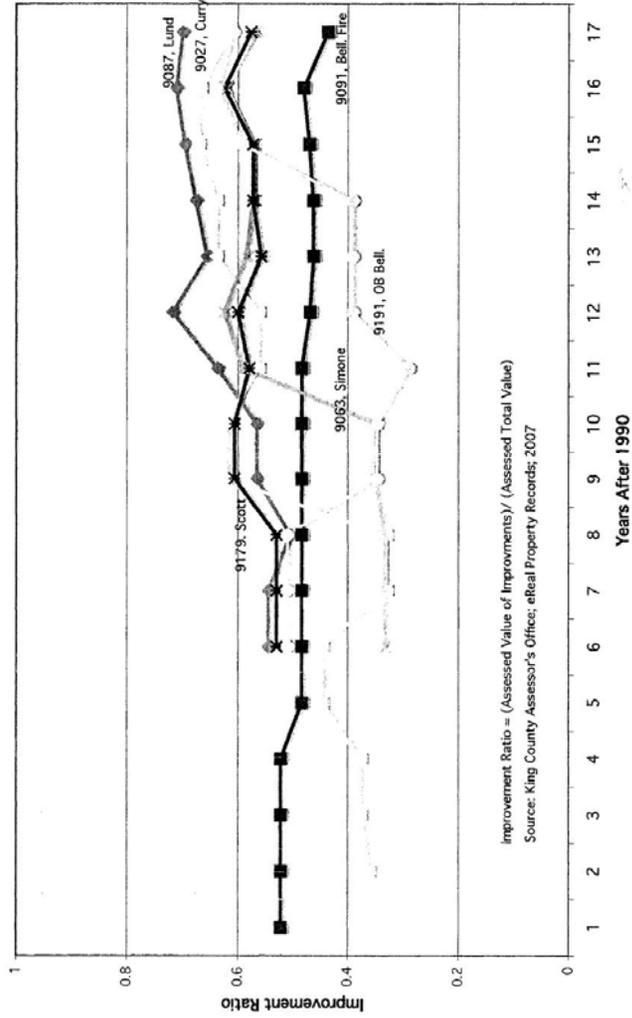
Figure 6.1. Improvement Ratios for Selected Properties, 1994-2007



Comments

Responses

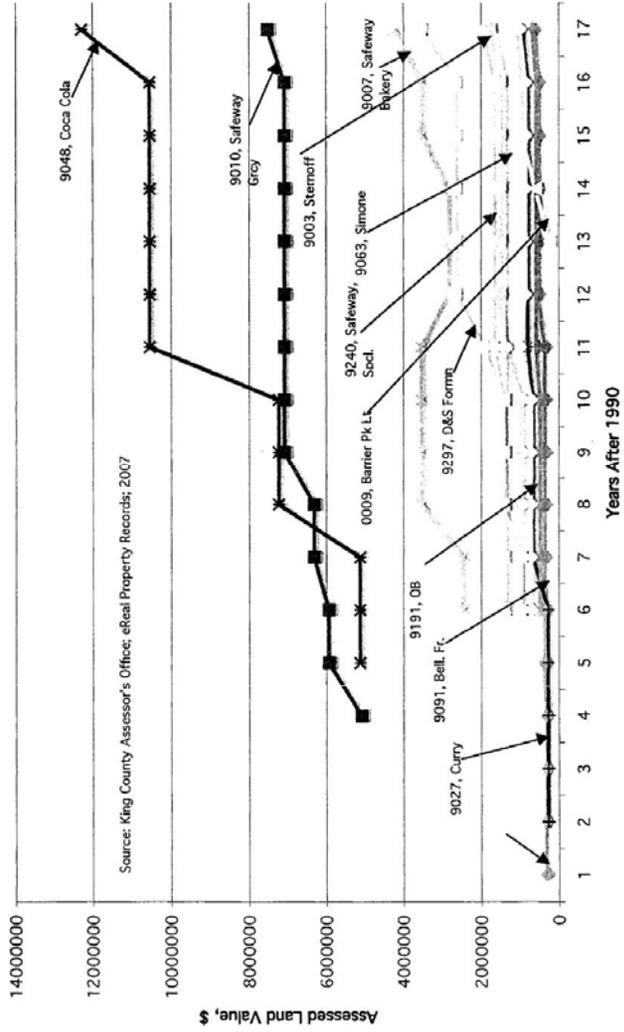
Figure 6.2. Improvement Ratios for Selected properties, 1991-2007



Comments

Responses

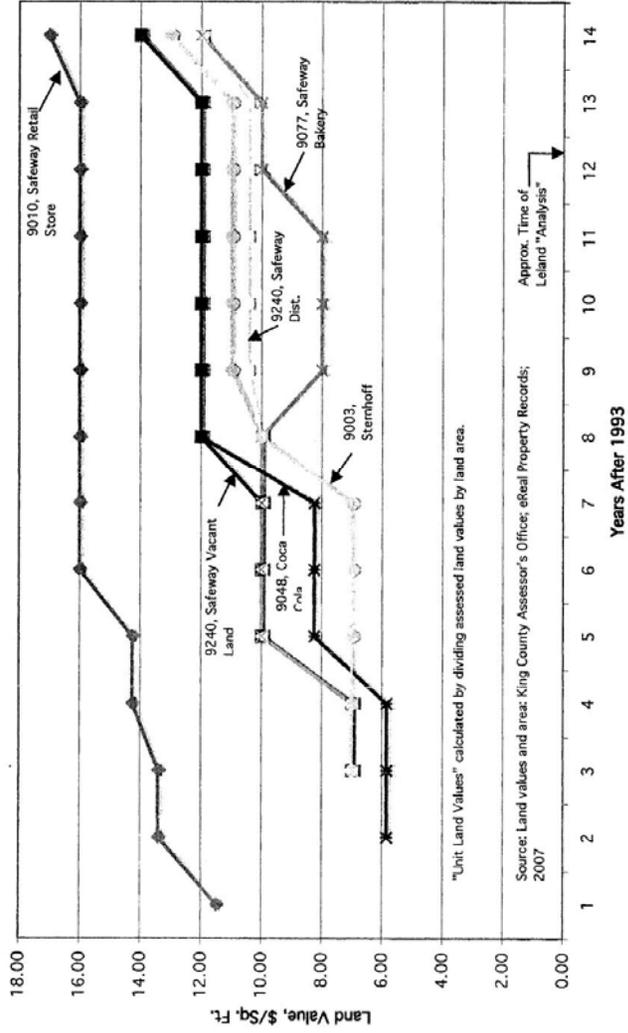
Figure 6.3. Assessed Land Values, Selected Properties, 1991-2007



Comments

Responses

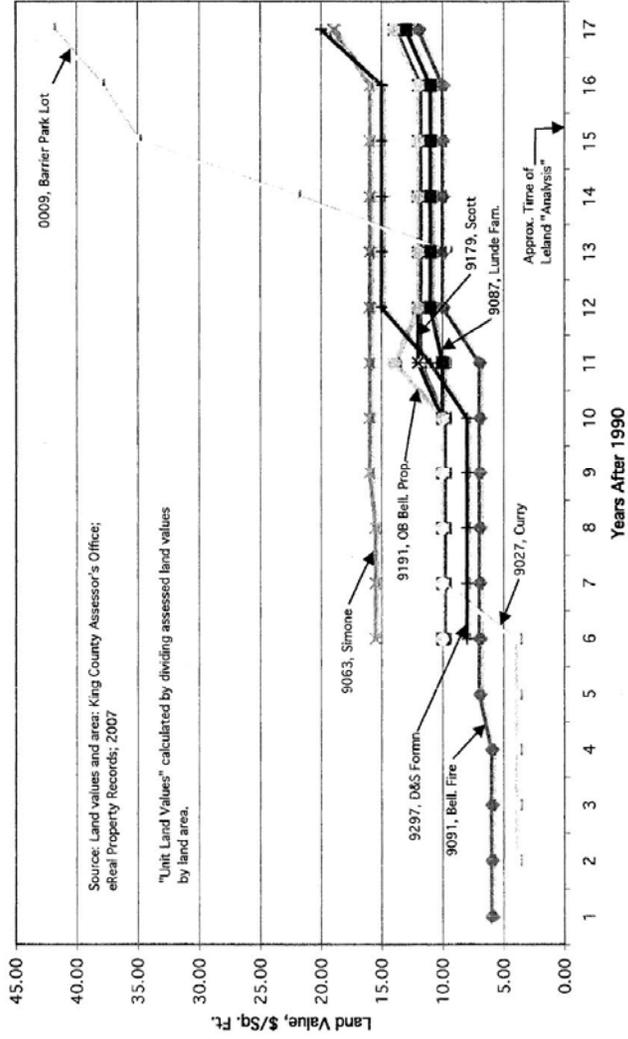
Figure 8.1. Assessed Unit Land Values, Selected properties, 1994-2007



Comments

Responses

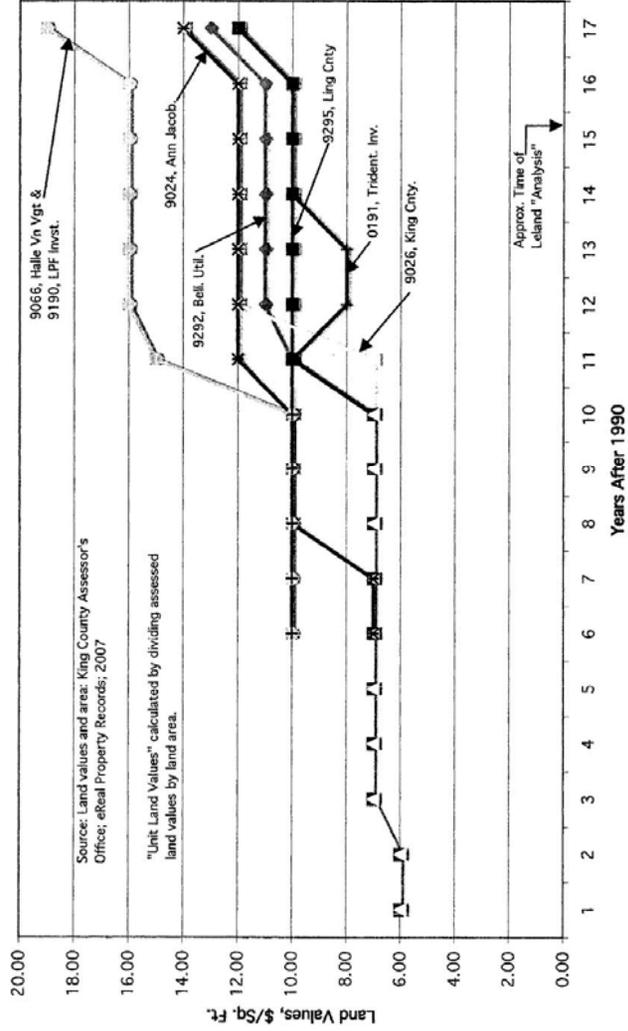
Figure 8.2. Assessed Unit Land Values, Selected properties, 1994-2007



Comments

Responses

Figure 8.3. Assessed Unit Land Values, Selected Properties, 1991-2007



Comments**Responses****Table X. References for evaluating speculative land use values under conditions of changing land-use and zoning**

1. Haurin, Donald R. "US Commercial Real Estate Indices: Transaction-Based and Constant-Liquidity Indices." BIS Papers No. 21, Real Estate Indicators and Financial Stability. Proceedings of a joint conference organized by BIS and the IMF. Washington DC, 27-28 October 2003.
2. Jud, G. Donald. "Price Indexes for Commercial and Office Properties: An Application of the Assessed Value Method." Journal of Real Estate Portfolio Management; American Real Estate Society; College of Business and Economics; California State Fullerton; Fullerton, CA. 1999.
3. Rosen, Sherwin. "Hedonic Prices and Implicit Markets: Product Differentiation in Pure Competition." The Journal of Political Economy, Vol. 82, No. 1, Jan.-Feb., 1974, pp. 34-55.
4. Shonkwiler, J.E., and J.E. Reynolds. "A Note on the Use of Hedonic Price Models in the Analysis of Land Prices at the Urban Fringe." Land Economics, Vol. 62, No.1, Feb. 1986, pp. 58-63.
5. Wheaton, William C. Urban Economics and Real Estate Markets. Prentice Hall. Upper Saddle River, NJ. 1995.

Comments

Responses

2.1.2, continued

25-33% of the total retail demand in the 8-zone area. Whether such a large area (28 square miles), and Leland's simplistic demand calculation is a useful basis to forecast retail floor area in the Corridor is certainly doubtful, and there are no references in Leland's report or the DEIS to rationalize this approach. In addition, Leland's approach did not account for retail floor area "demand" that would be accounted for based on similar 'demand circles' centered on Bellevue Square, Factoria, Crossroads, and Redmond's Overlake area. If these four areas are accounted for, there is no area within the Bel-Red Corridor 'demand circle' that would not be satisfied by existing developments. Further, a short literature search will show that there are many forecasting models that can be used for such an analysis: some examples of more sophisticated models are given in Table Z. The DEIS should be revised to rationalize Leland's approach, or, preferably, to reflect the results of a more systematic, modern analytic technique.

Leland's report and the DEIS (page 2-2) state that "... the market will be able to support ... 2500 to 5000 residential units ..." There is no rationalization or explanation of how these values were derived. Apparently these values were first presented to METROK by City of Bellevue representatives at a meeting between K. McDonald (and others) of the City of Bellevue, and V. Obeso (and others) of METROK in Seattle on 29 December 2005. According to Mr. Obeso, the City of Bellevue 'team' presented the values as part of their "downtown Bellevue East" project. The DEIS (page 8-4) has estimated the "existing population in the corridor" as 290; it is not clear whether this means the population for calendar year 2000, or 2006 (the year the DEIS was prepared). At approximately 2.3 persons per household, this would yield an existent household inventory of about 125 housing units (in either 2000 or 2006),

PSRC's 2003 forecast for FAZ 5205 (the FAZ that covers virtually all of the Bel-Red Corridor) shows a net gain of 1104 housing units (2000-2030); however, virtually all of this forecasted gain would be north of SR-520. Similarly, census tract 237, the tract that covers virtually all of the Corridor shows that (based on the 2000 federal census), the tract's population is 4033, with 1755 housing units. Again, virtually all of the population and housing units would be north of SR-520.

The DEIS, and information received for the City's consultants (Leland Consulting, Crandall Arambula, and CH2M Hill), provide no substantiating analyses to support the 2500-5000 residential unit predictions. Moreover, the Bellevue's Buildable Lands Report dated 31 October 2001 (page 8) confirmed that "... the City can accommodate both its 2012 housing and jobs targets without the need to change the Comprehensive Plan or rezone additional properties to higher densities or intensities." This same conclusion was confirmed to the Bellevue Planning Commission in October 2003 as part of the Bellevue Planning and Community Development Department's review of the 20-year growth targets for Bellevue's Comprehensive Plan update; and to the Bellevue Transportation Commission in June 2005. And King County's Buildable Lands Evaluation Report (September 2002) likewise concluded that "... King County has well over the capacity needed to accommodate the growth that is expected to occur by 2012." Also, Bellevue's Comprehensive Plan (amended through January 2006, page 37 of the Land Use Element) states that "Bellevue has established that it has the zoning capacity to meet the housing and employment targets..." through 2022; there is no mention of a need to rezone the Bel-Red Corridor. The conflict between the City's Buildable Lands Report (and subsequent analyses and presentations to the Planning and Transportation Commissions by the Staff, King County's Buildable Lands Report, and the Comprehensive Plan) and the residential unit predictions cannot be rationalized.

David Plummer-65a

See response to David Plummer-62a.

David Plummer-66a

As noted in this comment, analysis conducted for the DEIS estimates the 2005 population in the Bel-Red Corridor to be 290. This estimate is based on housing unit figures from the City's land use database, which are used as inputs to the Bellevue-Kirkland-Redmond (BKR) travel demand model. The study area population was calculated by applying Bellevue's average household sizes to the housing units in the BKR model. (Household size estimates were derived from the 2000 Census.)

David Plummer-67a

Comment noted.

David Plummer-68a

See response to David Plummer-18a. The residential forecast in Leland's report was based on many factors, including analyzing past and future employment trends in Bellevue and East King County. Based on forecasts, this area will continue to have strong employment growth over the next several decades, which will help develop a strong market for housing, particularly housing in closer proximity to employment centers. Finding places outside of the downtown area to accommodate housing demands in the future will become increasingly difficult, and the Bel-Red Corridor, given its proximity to both the Downtown and Overlake employment centers, offers an opportunity to do so.

Comments

Responses

Table Z. Examples of equations for forecasting demand for retail floor space:

Equation 1:

$$\text{Total Demand}_{\text{year } t} = -5.986 + 4.556 \ln(\text{Local Population}_{\text{year } t-2}) + 7.845 \ln(\text{Visitor Retail Expenditure}_{\text{year } t})$$

Equation 2:

$$\text{Total Demand}_{\text{year } t} = -8.179 + 6.329 \ln(\text{Visitor Retail Expenditure}_{\text{year } t}) + 4.947 \ln(\text{Working Population}_{\text{year } t-1})$$

Equation 3:

$$\text{Total Demand}_{\text{year } t} = 3.710 + 12.647 (\text{Retail Employment}_{\text{year } t}) - 5.451 (\text{Average Retail Employment per Unit Floor Area}_{\text{year } t-1})$$

Equation 4:

$$\text{Total Demand}_{\text{year } t} = 2.858 + 38.654 (\text{Total Demand}_{\text{year } t-1}) - 3.197 (\text{Retail Property Price}_{\text{year } t})$$

Equation 5:

$$\text{Total Demand}_{\text{year } t} = -16.632 + 6.190 \ln(\text{Visitor Arrivals}_{\text{year } t}) + 2.426 \ln(\text{Retail Sales}_{\text{year } t}) - 2.961 \ln(\text{Retail Property Price}_{\text{year } t})$$

Equation 6:

$$\text{Total Demand}_{\text{year } t} = -8.862 + 6.923 (\text{Visitor Arrivals}_{\text{year } t}) + 10.004 \ln(\text{Retail Sales}_{\text{year } t}) - 5.406 (\text{Retail Property Price}_{\text{year } t})$$

where \ln = natural logarithm

Source: Hong Kong Planning Standards and guidelines; Planning Department, The Government of Hong Kong Special Administrative Region, Peoples Republic of China; February, 2007.

Comments

Responses

2.1.2, continued

Finally, *none of the City Council's 10 'planning principles' deals directly with, or even mentions including provisions for increased residential housing in the Corridor. If this was specifically intended or required by the Council, it should have been distinctly mentioned as a separate 'principle.'*

69 *Thus it is clear that the housing demand predicted (as distinct from forecasted) for the Bel-Red Corridor can only be characterized as arbitrary and capricious, since it is not supported by any analysis or technically substantiated forecast, and was not intended or required by the City Council as expressed in their 'planning principles' for the Project. Moreover, the PSRC-forecasted increase in housing units through 2030 can easily be satisfied by available zoned land throughout the City, or by recent City rezones contemplated for Crossroads and Factoria. And since demand for housing is greatly affected by many exogenous variables (mortgage interest rates, economic activity levels, income levels, etc.), the predicted demand for housing should be eliminated from the DEIS/EIS.*

70 2.1.3 The biased and unsubstantiated material on page 2-7 regarding the Steering Committee's evaluation of feedback from corridor stakeholders and the public should be purged from the DEIS/EIS. In addition, the DEIS/EIS should recognize the limited amount of analysis that has been done for the Project, especially the deficiencies in the market analysis performed by Leland Consulting. In addition, the DEIS/EIS should acknowledge that the 3 Action Alternatives are not substantively different, and the fact that the City and its consultants never analyzed the possible developments within the Corridor for the No Action alternative.

2.2 Chapter 4

71 2.2.0 *This chapter does not include an analysis of the opportunities for enhancing Corridor watershed processes under the No Action alternative. This deficiency should be corrected, as it is clear that there are many opportunities for such enhancement under the No Action alternative because of the City's strong commitment to watershed and habitat enhancement and protection. For example, "barriers" in Sturtevant Creek, West Tributary, Goff Creek, Kelsey Creek, and Sears Creek could all be mitigated or removed entirely by individual City-proposed and/or funded initiatives. These mitigation 'projects' would be far less costly than similar actions under the DEIS Action Alternatives, even if some property owners were to be offered 'bribes' for such mitigation by more intensive zoning on their property. The cost for any mitigations undertaken in response to such 'bribes' would only be passed on to users of their properties, and there is no analysis to show how any alleged 'public benefits' (under such schemes) would be disseminated to the public³.*

2.3 Chapter 5

72 2.3.0 The noise analysis reported in this chapter is not credible because the projected 2030 traffic counts (sometimes mistakenly referred to as "volumes") are virtually identical for all the (No Action and Action) alternatives, and are probably well inside the error levels to be expected for the traffic models apparently employed by CH2M Hill. The inclusion

³ See: Cheung, Steven N. S., "The Myth of Social Cost." CATO Institute; San Francisco. 1980.

David Plummer-69a

Council planning principle (Number 8) that states that an objective of the planning effort should be "neighborhood protection, enhancement, *and creation*" (emphasis added). This indicated an interest on the part of the Council to examine the potential for housing in this area; this intent has been also expressed by the project steering committee.

David Plummer-70a

Comment noted.

David Plummer-71a

Fish passage barriers at public road crossings were identified in a culvert assessment conducted in 1999. The City of Bellevue Utilities Department has a fish passage improvement program working to address these fish passage issues over time. However, the remediation of the street crossings would not solve the fish passage issues on these streams. There are many fish passage barriers on private property upstream of Bel-Red Road, including substantial portions of the stream that have been piped for hundreds of feet beneath buildings or parking lots. The City would not remediate these impacts of private property.

David Plummer-72a

See response to Peter Mears-3. The comment regarding traffic volumes used for the Noise analysis was addressed in the response to David Plummer-43a.

Comments

Responses

2.3.0, continued

of noise generated by construction activity is entirely superfluous because this DEIS is a non-project DEIS, and does not need to consider hypothetical activity for specific building/implementation projects. Thus, all material related to the City's proposed design solutions to implement their intended rezone and land-use intensification should be removed from the DEIS and the succeeding EIS.

The mitigation measures discussed in the DEIS are entirely superfluous to the DEIS and the succeeding EIS as they refer to proposed design solutions to implement the City's proposed rezone and land-use intensification within the Corridor. The mitigation measures identified during 'construction' have no relevance to the DEIS; the proposed mitigation measures identified for 'operation' likewise have no relevance, since this is a programmatic DEIS, not a DEIS for a specific project. In any event, the proposed mitigation measures are totally without merit, and have no bearing on any real-world mitigation measures that might be implemented under specific proposals for development under the City's proposed scheme to rezone the Corridor. The measures identified are merely 'cook-book' measures derived from any standard handbook on noise/sound control for transportation projects, and have no direct bearing on the subject of the proposed changes to the City's comprehensive plan, subarea plans, land-use code, etc.

2.4 Chapter 6

2.4.0 This chapter should be rewritten to make it conform to requirements for preparation of non-project DEIS/EISs. For example, all material related to construction impacts should be deleted, as no construction is proposed under this non-project DEIS. The entire chapter should be rewritten to reflect the general environmental hazards within the Corridor without presupposing the implementation of the City's proposed rezone and land-use intensification. All "operational impacts" should be deleted, as there are no specific proposals for development under this non-project DEIS.

2.5 Chapter 7

2.5.0 In the 4th paragraph on page 7-1 of this chapter, the DEIS asserts that " ... the policies of previous plans are considered less relevant than ..." the Bel-Red Corridor Project planning principles adopted by the City Council for the Project. This statement directly contradicts the requirements of Washington State laws (RCW and WAC), e.g., RCW 36.70A.035, RCW 36.70A.130(1)(d), RCW 36.70A.140, RCW 36.70A.210; City codes, e.g., 20.40.401, etc.; Comprehensive Plan policies CP-2, CP-3, and CP-5; and paragraph 4.1 of SEPA Handbook, Publication #98-114. All of these sources require that existing plans and policies must be considered in evaluating the No Action and Action alternatives described in the DEIS. In addition, *the so-called 'principles' are merely a set of statements included in the Council's motion at the Council's 10 October 2005 study session to approve selection of members of the Project Steering Committee; this motion was approved by a vote of 6-1. These 'principles' were not subjected to any public scrutiny or comment, and were not even discussed by the Council in their 10 October 2005 study session. Therefore these 'principles' can only be used as general terms of reference in assessing the No-Action and Action alternatives; they have no force majeure quality. In any event, the No Action alternative is almost wholly compliant with their provisions: see Table 5 above.*

David Plummer-73a

Because this is a programmatic State Environmental Policy Act (SEPA) evaluation, general, nonproject-specific mitigation measures are included to serve as a guide for the types of mitigation that could be employed on a project-specific basis. This is consistent with the intent of SEPA, which requires that mitigation be considered for both project and nonproject environmental review.

David Plummer-74a

The chapter as written is fully compliant with the requirements of SEPA for nonproject DEISs. In particular, the SEPA Rules state: "If the nonproject proposal concerns a specific geographic area, site specific analyses are not required, but may be included for areas of specific concern" (WAC 197-11-442(3)).

David Plummer-75a

The DEIS analyzed the alternatives vis-à-vis several policies in the existing Bellevue *Comprehensive Plan*, not just the project principles established by the City Council. These policies are outlined in Chapter 7 of the DEIS.

Comments

Responses

2.5, continued

76 2.5.1 The writing on page 7-7 of this chapter states that "... many commercial and industrial buildings in the study area are between 25 and 35 years old." No statistics or data are given to substantiate this claim; also, most commercial and industrial buildings have economically useful lives of 30-50 years, so the comment in the DEIS is of no relevance whatsoever. Also the assertion on page 7-7 (under "Building Characteristics") that there has been limited development in this area since 1990 is not substantiated by any data; moreover, there has been significant continuing property improvements and new building in the Corridor for the last several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated and expanded its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9, above.

77 2.5.2 The writing on page 7-7 of this chapter comments that the FARs for buildings in the study area range from 0.4 to 0.6, and notes that the FAR for new developments in the downtown Bellevue office/business district is 2.74. No source or data is presented to justify this assertion, nor is there any relevance in comparing multi-story high-rise buildings with the buildings that might be built in the Corridor under the staff's proposed rezone.

78 2.5.3 The text on page 7-9 of this chapter asserts that the Washington State GMA (RCW 36.70A), PSRC's Vision 2020 Plan, King County Countywide planning policies, and the Bellevue Comprehensive Plan (BCC Title 21) were designed to "... ensure development consistency and predictability and provide a framework for determining whether a project under consideration aligns with the community's vision of its future and the characteristics of its particular location." This statement (in addition to not being too coherent) is manifestly untrue, as there is no document that captures the Bellevue community's vision of its future, and no documented evidence that any attempt has ever been made to assemble such a document. All City documents such as the Comprehensive Plan and the subarea plans have been developed with virtually no input from a broad range of Bellevue citizens; the City's voter participation rates in general and City Council elections confirm that the vast majority of Bellevue citizens have no interest in participating in the development of such visionary expressions. Rather, the few documents such as the Comprehensive Plan and subarea plans reflect the narrow vision of the City's (and the Region's) power brokers; if this were not true, the built environment of the City, particularly the downtown area, would look substantially different than it does today. In addition, the documents referred to (GMA, Vision 2020, etc.) do not provide any sort of 'framework' or reference system within which some sort of 'community vision' can be constructed; indeed, there are no extant processes that can be used to develop such visions. These kind of absurd statements should be removed from the DEIS/EIS.

79 2.5.4 Missing from the list of policies/plans alluded to on pages 7-9 and 7-10 of this chapter is any mention of the City's Buildable Lands Report, and subsequent staff analyses that confirmed that there was no reason to rezone land within the City to meet the City's population/employment growth targets out to 2020. While this report and

David Plummer-76a

The statements about building age and recent building activity are substantiated in the first technical memorandum prepared, and submitted, by Leland Consulting Group.

David Plummer-77a

Comment noted. The DEIS intended to compare the maximum assumed floor-area ration (FAR) for development in the Bel-Red Corridor with a typical structure developed under a similar FAR in downtown Bellevue. An example of a structure developed at 2.74 FAR would be the One Twelfth @ 12th office building.

David Plummer-78a

The City's *Comprehensive Plan* contains the vision for how Bellevue will evolve over time. The vision is articulated in the Introduction of the *Comprehensive Plan* and is expanded upon in the topical chapters of the plan as well as 14 subarea plans. There is public outreach and input during all amendments to the *Comprehensive Plan*. Bellevue's *Comprehensive Plan* is consistent with the framework of both the King County Countywide Planning Policies and PSRC's Vision 2020.

David Plummer-79a

See response to David Plummer-18a. It is acknowledged that the buildable lands report is not included in the list of policies/plans, because it is not a policy or a plan, but rather a report outlining how the City is performing with regard to development, and whether development is occurring consistent with assumptions made in the *Comprehensive Plan*.

Comments

Responses

2.5.4, continued

the staff analyses are not codified in City codes, they have important relevance for the rationale for this project, and should be discussed in this Chapter of the DEIS.

2.5.5 Economic development policy ED-26 is totally irrelevant to this DEIS, and to evaluation of the No Action and Action alternatives described in the DEIS. *There is absolutely no evidence that the Bel-Red Corridor is in economic decline as judged by any factual statistical evidence, or any information provided by the City staff or the City's consultants.* As noted above, there have been many examples of property improvements and redevelopment in the Corridor over the past several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9 above.

2.5.6 On page 7-13 of the DEIS, under Bel-Red/Northup Subarea Plan, it is asserted that the City has "... recognized the need to reassess the policy direction for the Bel-Red Corridor" (which is not the same as the Bel-Red/Northup subarea). This statement is misleading because the City staff has never developed any credible rationale for their proposed rezone and land-use intensification in the Corridor, as has been amply shown in the preceding material. In fact, the City staff has never advanced one credible, defensible rationale for their proposed rezone in this Corridor. Yes, some changes in land use have occurred, but these changes are all permitted uses under the existing zoning for the Corridor, otherwise, the City would not have allowed them to be made. *The gradual change in land use is a result of property owners' assessment of changing market conditions and demand for uses in the Corridor. This sort of evolutionary change is to be expected, and results in much more efficient development than the grandiose scheme preferred by the City staff. Further, it allows for more gradual deployment of new transportation and other public infrastructure, and ensures that the market can absorb the new developments in an orderly and efficient manner.* Indeed, there are only two credible reasons why the City staff has proposed this grandiose rezone:

1. To increase the tax revenue flows to the City; and,
2. To augment and consolidate Sound Transit's plan to deploy uneconomic, non-cost-effective light rail transit from Seattle to Bellevue and on to Overlake Transit Center and (eventually) to Redmond.

2.5.7 The description of the land use impact on page 7-16 of the DEIS incorrectly states that the City will propose to adopt changes to the Comprehensive Plan, and other affected policies, codes and zoning to implement the type of development envisioned by the City staff and as described in the 3 Action Alternatives. *There is no basis at all for this conclusionary comment in the DEIS, as the City Council has yet to consider the No Action and Action Alternatives, and, because of the excessive costs for transportation and other public infrastructure, may choose a more rational alternative.* This part of the DEIS should be revised to state only that the Council will consider possible alternatives, and will direct the staff to prepare the necessary proposals for

David Plummer-80a

The Economic Development Element encourages land use planning to support commercial area development and renewal. Such renewal supports the key goal in the Economic Development Element to pursue a strong local economy that provides employment and other economic opportunities. Policy ED-26 states that it is the City's policy "where commercial areas are in decline," to "work with businesses and others stakeholders to identify corrective actions which may include... Planning for new uses and new urban forms...." See response to David Plummer-25a on employment trends between 1995 and 2004. Accompanying Policy ED-26 is a discussion in the *Comprehensive Plan* that raises the question of whether industrial, warehousing, and distribution "still make sense in all of the areas" where they are located, and "whether consuming close-in urban land for sprawling, land intensive uses is the 'highest and best use'...." The *Comprehensive Plan* states that it is appropriate for the City to examine these older areas periodically to ensure that they continue to be vital and productive. The Bel-Red Corridor planning effort and associated DEIS are consistent with this and relevant to policy ED-26.

David Plummer-81a

The Council-appointed Steering Committee has the role of overseeing the Bel-Red Corridor planning effort, guiding project staff and consultants, and developing recommendations for the City Council. The City Council is the final decision-maker for the project.

David Plummer-82a

Comment noted. To implement the Preferred Alternative selected by the City Council will require all the actions identified in the various chapter of the DEIS where mitigation is proposed.

Comments

Responses

2.5.7, continued

changes to the Comprehensive Plan, subarea plans, landuse code, and other affected City documents to implement the Council's approved approach to land use in the Corridor.

83 2.5.8 The description of ways to reduce the consumption of land for recreation uses under the Action Alternatives on pages 7-17 and 7-18 should be revised to delete the comment about "the Corridor's high land values" as there is no analysis that estimates what Corridor unit or parcel land prices would be under the Action Alternatives, and comparison to the unit/parcel land prices in Downtown Bellevue is not appropriate unless the City acknowledges that it is proposing to develop the Corridor into something like the Downtown area. In addition, the description of ways to lessen the need for recreation facilities under the Action Alternatives ("...park-school sites, athletic fields, private parks, ... green streets ..." etc.) is entirely inappropriate as it tends to bias the DEIS in favor of the Action Alternatives. In fact, no school sites have been proposed; offsetting recreational 'needs' by artificial, bureaucratic-imposed solutions implies that social benefits can be transferred to the public through such schemes; these approaches to public policy are only thinly disguised mechanisms for transferring wealth from the public to private land owners and property developers.

2.5.9 The entire discussion on pages 7-18 and 7-19 on land use, and consistency with plans, policies and Bel-Red Corridor Planning Principles is totally misleading, biased, and unsupported by any analysis or rationale:

84 a. There is no analytic or other data to support the assertion that there would be no major changes in land use in the Corridor under the No Action Alternative. Rather, normal evolutionary, market-driven changes to land-use and zoning changes are to be expected under the No Action alternative. The past 50 years of City history has shown conclusively that such evolutionary changes are to be expected, and do occur. Neither the City staff nor its consultants have examined this development vector, and the City has not obtained any significant information on such possible development from a large number of the Corridor land/property owners, nor from any independent consultant. In addition, the City staff has made no attempt to evaluate this possible development vector. *To assert that the City would not be able to respond to employment and population growth 'pressures' from Downtown Bellevue and Redmond's Overlake developments is absurd!* The City would respond to such developments as it has in the past, by improving transportation infrastructure, improving public amenities, etc.

85 b. The assertion that the No Action alternative would not support inclusion of residential areas in commercial districts per policy LU-7 is misleading. LU-7 states that this is a good policy " ... where compatibility can be demonstrated." The City has presented no analyses or evidence that residential developments in the commercially-zoned areas of the Bel-Red/Northup sub area would not be compatible, or that such developments have been proposed and denied by the City. This part of the DEIS should be corrected to remove this biased, unsupported assertion.

86 c. Land use policy LU-23 is a broad policy that cannot be applied to every square meter of the City's area; it is so general and broad as to be virtually meaningless as an instrument of public policy. In addition, there is no operational definition of what this policy means, nor any analysis to show that it should and must be applied to every square meter of the City's area.

17

David Plummer-83a

Comment noted.

David Plummer-84a

See response to David Plummer- 18a. There is no assertion that no change would happen in the No-Action Alternative; the DEIS assumed that some modest commercial and industrial growth would occur, consistent with PSRC forecasts. The No-Action Alternative assumed that any change would happen under the policy framework currently in place; any change to this framework would de facto not be the No-Action Alternative.

David Plummer-85a

Comment noted.

David Plummer-86a

Comment noted.

Comments

Responses

2.5.9, continued

d. The assertion that the No Action alternative would not support citywide policies of promoting transit use is totally false. Present and likely future developments and land uses in the Corridor under this alternative easily meet the policy provisions of TR-70. This can be accomplished at much lower cost (than the Action Alternatives) by provision of improved bus transit along the Bel-Red Road, NE 20/Northrup, and other north-south arterials, and by working with Sound Transit to evaluate and encourage the provision of an LRT station along the SR-520/LRT route at approximately 124-130th NE. Not only would the No Action alternative provide equal LRT ridership between Bellevue and Overlake/Redmond, but it would do so at much lower cost because less land would be consumed for the LRT route, there would be fewer stations, and it would cost much less to construct. The lower cost of the SR-520 LRT route is confirmed by Sound Transit's evaluation: see "Sound Transit Board Briefing Book, Light Rail Alternatives; East Link Project"; Sound Transit; Seattle; November 2006. *The DEIS discussion on the compatibility of the No Action alternative and LRT transit provisions is totally inaccurate and misleading and should be revised.*

e. Invoking the so-called Bel-Red Corridor Planning Principles into the discussion of the No Action alternative's consistency with plans, policies, and 'principles' is totally fallacious: *the so-called 'principles' are merely a set of statements included in the Council's motion at the Council's 10 October 2005 study session to approve selection of members of the Project Steering Committee; this motion was approved by a vote of 6-1. These 'principles' were not subjected to any public scrutiny or comment, and were not even discussed by the Council in their 10 October 2005 study session. Therefore these 'principles' can only be used as general terms of reference in assessing the No-Action and Action alternatives; they have no force majeure quality. In any event, the No Action alternative is almost wholly compliant with the Council's 'principles': see Table 5, above.*

f. *This non-project-proposal DEIS is conspicuously lacking any summary of the proposed changes to the City of Bellevue's Comprehensive Plan, the Bel-Red/Northrup Subarea Plan, the Crossroads Subarea Plan, the Wilburton/NE 8th Street Subarea Plan, and the Bellevue City Code. Because proposed changes to these plans and the City Code are not defined in the DEIS, there is no way to be sure that all possible impacts have been analyzed and defined. Moreover, the absence of these proposed changes prevents the public and reviewing agencies from clearly understanding exactly what is being proposed. The absence of this information fatally flaws this DEIS.*

2.5.10 There is no justification provided for changing Crossroads subarea policy S-CR-56, as this area (B) of the Crossroads subarea is in close proximity to single family housing to the east, and adequate multifamily-zoned land already exists to the south and southeast of this small area in the Corridor.

2.5.11 On page 7-21 of this chapter it is asserted that the Action Alternatives would facilitate "... infill development ... and ... would be consistent with a development pattern that reduces consumption of undeveloped land ..." As noted on page 7-2 of the DEIS, only about 12% of the Corridor's land is not developed, and much of this area is 'environmentally constrained;' thus, there is very little land in the Corridor that would facilitate "infill."

David Plummer-87a

The existing transit service provides a valuable commute alternative to employees of businesses on the perimeter of the Bel-Red Corridor, particularly along Bel-Red Road. The routes and the service frequency are commensurate with the current demand for transit service, given the low intensity and dispersed land use pattern. Improving transit service under the No-Action Alternative may not be justified given the nature of the future development expected under the existing zoning.

Sound Transit's light-rail alignment, if it runs along the SR 520 route, does not include provisions for a station between Overlake Hospital and the Overlake Village in Redmond. Such an alignment would be contrary to the City Council planning principle that calls for taking advantage of the opportunity that light-rail service provides. Therefore, the Steering Committee elected to study alternatives that included an alignment that runs through the middle of the corridor, and a number of stations to support more intense and diverse land use. The Preliminary Preferred Alternative retains an alignment along the NE 16th Street corridor, with station locations near Overlake Hospital, 122nd Ave NE, and 130th Avenue NE. Bus transit service routes would be realigned, and service hours would be reallocated to serve emerging land use patterns within the corridor and to connect between nearby neighborhoods and the light-rail stations.

David Plummer-88a

The Council's Planning Principles for the Bel-Red Corridor Project, documented on pages 1-4, -5, and -6 of the DEIS represent direction to the Steering Committee, staff members, and consultants in undertaking the work to prepare the Preliminary Preferred Alternative.

Comments

Responses

2.5, continued

92 2.5.12 On page 7-21 of this chapter, it is asserted that the Action Alternatives would be consistent with the 'overarching goal' of the City's economic development element in the Comprehensive Plan. This same assertion can be made about the No Action alternative, as there are presently about 1600 businesses in the Corridor, with about 21,000 jobs; and PSRC estimates that employment will grow to over 32,000 by year 2030: see Table E49-2 above. Thus, the No Action alternative provides ample opportunity for employment growth over the next 20 years.

93 2.5.13 Because the amount, kind, intensity and location of City-proposed developments in the Bel-Red Corridor have no substantive basis or rationale, this chapter should first be extensively revised to delete all the detailed design-solutions extensively and excessively described in the Action Alternatives. Second, include the proposed changes to the City's Comprehensive Plan and the Subarea Plans, the City's Land Use Code, and all other affected codes and documents. These proposed changes should be accompanied by specific '*objectives*' for the proposed revisions, rather than relying on vague 'planning principles' resulting from City Council unilateral actions or uncoordinated input from an ad hoc citizen committee. Third, the City staff should then describe alternate means of achieving the objectives, rather than proposing specific design solutions as described in the Action Alternatives of the DEIS. This revision to
94 the DEIS would bring it into conformance with WAC 197-11-442. All material in this chapter related to mitigation measures for "construction" and "operation" should be deleted, as this is a non-project proposal, and such mitigation provisions would only be described in DEIS/EISs for specific development proposals.

2.6 Chapter 8

95 2.6.0 As noted above, the Leland Consulting Group studies referred to on page 8-7 of this chapter have no substantive or rational basis; the "data" used in the Leland reports are simply one-time snapshots of certain characteristics of developments/activities in the Corridor. Leland's so-called 'market analysis' is nothing more than a generalized, unsubstantiated prediction of possible developments advanced to substantiate the City staff's intention to rezone the Corridor to more intense use. *No other independent, unbiased analyses were undertaken by the City to compare to Leland's predictions.*

96 2.6.1 The DEIS asserts on page 8-7 that "... (n)ew manufacturing or warehouse uses have become less economically viable due to increasing land values. These values indicate that investors are anticipating a future change in land use regulations that will create redevelopment opportunities." *There is no data provided in the DEIS to substantiate this absurd claim! The only recent/contemporary sources of anticipatory changes to intensify the land use in the Corridor are (1), the unsubstantiated reports submitted to the City as part of the Bel-Red Corridor Project from consultants committed to supporting the staff's intention to rezone the Corridor; and, (2), the continuing reinforcement of the likelihood of such changes by pronouncements of City staff members.*

97 2.6.2 Delete all text in the chapter related to construction impacts (pp 8-8 and 8-9), as this a non-project DEIS, and no project development is anticipated under this DEIS.

David Plummer-89a

Potential changes to the three affected subarea plans will be forthcoming as part of the implementation of the Final Preferred Alternative selected by the City Council. Subarea plan changes would be in the form of land use plan map changes and policy amendments, based on the concepts embedded in the Preferred Alternative. A public process, led by the Planning Commission, will be conducted prior to adoption of any subarea plan changes.

David Plummer-90a

A small portion of the Crossroads Subarea Plan (area that includes Angelo's, Uwajimaya, etc.) is included in the Bel-Red Corridor study area. The direction in the Preliminary Preferred Alternative is for this area to be Mixed-Use Residential/Retail. If the Final Preferred Alternative retains this direction, then policy changes would be drafted to remove restrictions on multifamily housing in this area.

David Plummer-91a

Comment noted. Much of the land in the Bel-Red Corridor is already developed, so most new development over the next several decades will occur through redevelopment of parcels that are currently developed. By providing greater allowable densities and a broader mix of uses, particularly in development nodes, the action alternatives, and the Preliminary Preferred Alternative, will provide greater opportunities for redevelopment of existing sites than the current plan and zoning.

David Plummer-92a

See response to David Plummer-80a.

Comments**Responses**

2.6, continued

98 2.6.3 There are no analyses or other data to confirm the assertion on page 8-9 (under "Operational Impacts") of this chapter that some housing development would not take place in the office and commercial zoned areas of the Corridor, or that future changes to the City's land use code would not permit such development in the general commercial zoned areas. In addition, the City's Buildable Lands Report dated 31 October 2001 (page 8) confirmed that "... the City can accommodate both its 2012 housing and jobs targets without the need to change the Comprehensive Plan or rezone additional properties to higher densities or intensities." This same conclusion was confirmed to the Bellevue Planning Commission in October 2003 as part of the Bellevue Planning and Community Development Department's review of the 20-year growth targets for Bellevue's Comprehensive Plan update; and to the Bellevue Transportation Commission in June 2005. And King County's Buildable Lands Evaluation Report (September 2002) likewise concluded that "... King County has well over the capacity needed to accommodate the growth that is expected to occur by 2012." Also, Bellevue's Comprehensive Plan (amended through January 2006, page 37 of the Land Use Element) states that "Bellevue has established that it has the zoning capacity to meet the housing and employment targets..." through 2022; there is no mention of a need to rezone the Bel-Red Corridor.

99 2.6.4 The assertion on page 8-13 (under "Economics") that there would only be minor positive economic benefits under the No Action alternative is totally unsupported by any credible analysis or data. The Leland study is a biased, development-oriented study that characterized the current and possible future developments in the Corridor under a no-action plan in a pejorative manner to reinforce the half-baked assertions in the study. Also, there is no evidence, or data, and no studies to substantiate the assertion that "few transportation projects would be built" under the No Action alternative: the City monitors transportation/traffic conditions in the City on a regular basis, and regularly updates its Transportation Capital Investment Plan, and other documents used by the City's Transportation Department and the City Council to evaluate the need for transportation system improvements in the City. There is no reason to believe that this oversight and response would not continue under the No Action alternative. For example, the City plans to make a number of intersection improvements within, or in the vicinity of the Corridor in the next several years; 130th NE between the Bel-Red Road and NE 20th is on the 2007 CIP Project plan for an overlay; the project on this street should start by mid May or early June of 2007; etc.

2.7 Chapter 9

100 2.7.0 Delete all material related to construction impacts in this chapter, as no construction is proposed under this non-project proposal.

101 2.7.1 This chapter does not provide any overview of what actions could be taken under the No Action alternative to improve the aesthetic character of the Corridor; this deficiency should be corrected.

20

David Plummer-93a

The FEIS includes analysis of a Preliminary Preferred Alternative. The Bel-Red Steering Committee will make a recommendation to the City Council of their Final Preferred Alternative following release of the FEIS. At that point, the City Council will provide direction to staff to develop the policy and code amendments consistent with the Steering Committee's vision for the corridor.

David Plummer-94a

SEPA does not exempt nonproject proposals from the evaluation of construction impacts. WAC 197-11-442 states: "The lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the non-project proposal and to the level of planning for the proposal."

David Plummer-95a

See response to David Plummer-34a and -62a.

David Plummer-96a

It has been a number of years since any new manufacturing or warehouse building has been constructed in the corridor. Some existing uses (such as the Coca Cola bottling plant) have continued to invest in existing facilities, but no new manufacturing or warehouse uses have been constructed in the corridor in the last several years. New development in the corridor, including in the Light Industrial zone, has been largely retail, including several automobile dealerships. The Leland Study concluded that new light industrial uses were likely no longer viable, while there would be a strong market for office and housing.

David Plummer-97a

See response to David Plummer-94a.

Comments

Responses

2.8 Chapter 10

102 2.8.0 This chapter is virtually incomprehensible because it contains excessive detail for a non-project DEIS, and because it does not use the same modeling and data reporting methodology that the City of Bellevue normally uses to report traffic counts (sometimes called 'volumes') and intersection level of service measures, and was not based on evaluations made by the Bellevue Transportation Department's Modeling and Analysis section. Consequently, it is virtually impossible to evaluate the information contained in this chapter of the DEIS and to compare it to comparable information previously reported by the City of Bellevue for similar or identical arterials or intersections. In addition, the basis of comparing the No Action and Action alternatives is so arcane, that it can only be understood by the analysts that created the analysis.

For example, as shown in Table 33-1, level of service 'grades' for various intersections and dates given in the DEIS are significantly different depending on the source of the information. Intersection delay times and grades are given for various intersections in and remote from the Corridor (see, for example Table 33-2), but there is no rationale for selection or exclusion of various intersections, particularly those remote from the Corridor. Also, the intersection and other transportation improvements assumed for the No Action and Action alternatives are almost impossible to discover from the information given in this chapter. In addition, this chapter of the DEIS reported bidirectional traffic counts for 2005 PM peak hour conditions at various locations along arterials within and near the Bel-Red Corridor; normal traffic count information reported by Bellevue's Transportation Department does not provide such data, so it is impossible to verify the accuracy of the DEIS information.

103 2.8.1 All material relating to construction impacts should be deleted from the DEIS as this is a non-project DEIS and no construction is proposed.

104 2.8.2 The mode-split information given on page 10-24 of the DEIS is totally unverifiable, and totally inconsistent with mode-split projections from other sources: see Table MS999 attached. Because this DEIS is a non-project DEIS, and because reliable transit ridership projections from Sound Transit and Metro are not available, speculation about possible mode-split ratios is totally unjustified, and totally unnecessary.

105 2.8.3 The information shown on pages 10-25 through 10-34 cannot be verified by any rational analysis or comparison with information from other sources, such as the Bellevue Department of Transportation. Because this DEIS is a non-project DEIS, this level of detail is totally unjustified, and should be removed from the DEIS, especially because there is no specific development or transportation-improvement proposals being made under this DEIS.

106 2.8.4 There is far too much detail for the LRT transit ridership projections in this chapter: details of Sound Transit's LRT vehicle design, headways, service frequency, routes and configurations (elevated, at ground level, etc.) for the East Link are not known, so all the material on pages 10-38 through 10-42 is pure speculation; it should be removed from the DEIS. In addition, the material on pages 10-43 through 10-47 is far too detailed for a non-project DEIS; it should be removed from the DEIS.

21

David Plummer-98a

See response to David Plummer-18a. Bellevue's current *Comprehensive Plan* does indicate that the City has capacity to meet the housing target for the 2001 to 2022 period. That period does not extend to 2030, which is the planning horizon for the Bel-Red Corridor Project. Zoning and land use changes that may follow from the Bel-Red Corridor planning effort may be phased. Furthermore, housing targets do not imply a cap on the number of housing units the City may accommodate.

The *Comprehensive Plan* notes that at the end of 20 years, a capacity of about 5,600 new units would remain, and that after the 2001 to 2022 planning period, Bellevue will start running out of capacity to accommodate new housing. Any changes to land use planning and zoning in the Bel-Red Corridor would be considered during the next round of countywide target allocations, which will be for the 2012 to 2032 period. As part of the countywide target allocation process, Bellevue will receive an updated target for households and employment.

As noted in the DEIS, the Bel-Red Corridor's potential for residential redevelopment is supported by the GMA and by policies contained in the *Comprehensive Plan* Housing Element. This is also consistent with *Comprehensive Plan* policy ED-7, which encourages an adequate supply of workforce housing that meets the needs of the city's diverse employment base.

David Plummer-99a

Comment noted. The No Action transportation system was based on existing plans, and, as noted, there are projects in the City's current Capital Improvement Program that were assumed in the No-Action Alternative.

Comments

Responses

**Table 33-1. Bel-Red Corridor Intersection LOS Data, PM Peak 2-Hours
Grades/Values**

Intersection No.	MMA No.	2005 LOS	2011 LOS	Existing 2005 Conditions	
		Peak 2-Hr PM	Peak 2-Hr PM	(From DEIS Table 10-2)	
		LOS Snapshot	05 SoM Rpt	LOS	Delay, seconds
		30-Jun-06	July 1, 2006	"Grade"	per vehicle
118	2	0.559 (A)	0.492 (A)	C	28
25	3	0.732 (C)	0.711 (C)	F	107
26	3	1.074 (F)	1.086 (F)	F	101
29	4	0.674 (F)	0.845 (D+)	D	47
30	4	0.710 (C)	0.757 (C)	D	46
32	4	0.539 (A)	0.549 (A)	C	31
34	4	0.807 (D+)	0.779 (C)	D	52
35	4	0.710 (C)	0.586 (A)	D	41
37	4	0.568 (A)	0.456 (A)	C	36
68	4	0.577 (A)	0.568 (A)	C	27
88	4	0.624 (B)	0.524 (A)	D	41
114	4	0.697 (B)	0.680 (B)	Not Incl.	?
116	4	0.617 (B)	0.608 (B)	Not Incl.	?
117	4	0.524 (A)	0.476 (A)	Not Incl.	?
139	4	0.607 (A)	0.462 (A)	Not Incl.	?
233	4	0.723 (C)	0.685 (B)	C	32
58	5	0.532 (A)	0.534 (A)	D	38
62	5	0.784 (C)	0.796 (C)	D	51
41	9	0.728 (C)	0.746 (C)	D	51
49	9	0.844 (D+)	0.896 (D)	D	48
39	12	0.750 (C)	0.722 (C)	D	49
40	12	0.712 (C)	0.747 (C)	D	50
47	12	0.933 (E+)	0.747 (C)	E	66
48	12	0.884 (D-)	0.803 (D+)	D	52
59	12	0.600 (B)	0.639 (B)	D	37
60	12	0.643 (B)	0.599 (A)	D	37
61	12	0.678 (B)	0.703 (C)	F	94
64	12	0.626 (B)	0.807 (D+)	D	36
81	12	0.970 (E-)	0.851 (D+)	Not Incl.	?
188	12	0.867 (D-)	1.167 (F)	E	57
189	12	0.402 (A)	0.858 (D-)	B	12
Avg. Delay					48.7

Sources:

1. Intersection and MMA numbers from CONCURRENCY UPDATE; City of Bellevue, 1 October 2006
2. 2005 and 2011 LOS values: State of Mobility Report; City of Bellevue, July 2006
3. Existing 2005 Conditions: Bel-Red Corridor DEIS; City of Bellevue, 25 January 2007

David Plummer-100a

See response to David Plummer- 97 a.

David Plummer-101a

Mitigation is not considered for the No-Action Alternative under SEPA because there is no agency action proposed that would require mitigation.

David Plummer-102a

There is a significant amount of information in Chapter 10 (Transportation). The information and analysis was provided given the interest residents, business owners, property owners, and surrounding neighborhoods would have in the project. WAC 197-11-442 (3) stipulates that for nonproject EISs, specific data and analysis is not required but permitted.

Regarding consistency with other City documents, it was not required that this DEIS provide data and/or analysis results that could be compared to other published documents, rather that methodologies and analysis tools were consistent within this document so that the impacts of the action alternatives could be compared amongst each other and against the No-Action Alternative. While it was the original intent of the project team to analyze the alternatives consistent with previously published documents, it became clear later in the process that this goal would be difficult to accomplish within the project's budget while providing little to no additional benefit. A detailed discussion of why different methodologies were used for this DEIS is contained on pages 10-3 and 10-4 of the DEIS.

Table 33-1, as provided in your comment letter, compares the existing conditions LOS analysis provided in the Bel-Red DEIS to two other sources of intersection operational analysis. The two other sources of analysis were conducted over a 2-

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Table 33-2. Bel-Red Corridor Intersection LOS Data. PM Peak 2-Hours Grades/Values

Intersect. No.	2030 Values for 'Grade'/Delay Time, seconds, For Alternative (From Table 10-6 of DEIS)			
	No Action (28 Inters.)	A1 (31 Inters.)	A2 (32 Inters.)	A3 (31 Inters.)
118	C/29	C/32	C/30	C/32
25	F(F)/136(94)	F/133	F/140	F/152
26	F/115	F/127	F/128	F/134
29	F(E)/97(71)	F/128	F/99	E/78
30	D/51	D/52	D/53	D/53
32	C/35	D/40	D/53	C/35
34	D/38	D/37	D/46	E/59
35	D/45	E/57	D/51	D/52
37	?	?	?	?
68	D/50	E/67	E/63	D/49
88	D/51	D/54	E/64	E/68
114	?	?	?	?
116	?	?	?	?
117	?	?	?	?
139	D/55	E/57	E/61	E/61
233	C/22	E/61	E/61	E/72
58	D/45	D/48	D/47	D/47
62	F(E)/116(63)	E/64	E/79	D/53
41	E/71	F/82	E/77	D/48
49	F(E)/88(65)	D/52	E/70	E/78
39	F(E)/103(63)	E/77	E/75	D/52
40	E(D)/66(53)	D/54	D/54	D/53
47	F(E)/109(68)	E/79	E/77	E/75
48	F(E)/93(80)	F/88	F/84	F/91
59	C/33	D/40	D/37	D/41
60	D/51	D/51	C/50	D/51
61	F(D)/90(52)	D/50	D/55	D/52
64	E(D)/73(53)	D/52	D/52	E/65
81	?	?	?	?
188	F(E)/108(72)	E/79	E/73	F/80
189	E/62	E/65	E/64	E/72
902	C/28	E/60	E/69	F/147
903	N/A	N/A	B/14	N/A
904	N/A	E/74	D/38	D/49
905	N/A	E/69	D/49	D/55
906	N/A	D/50	E/57	D/55
907	C/34	D/51	D/53	E/57
Total Delay	1894 (1549)	2030	2023	2066
Delay/Int.	67.6 (55.3)	65.5	63.2	66.6

Sources:
 1. Intersection numbers from "CONCURRENCY UPDATE," City of Bellevue, 1 October 2006
 2. Projected 2030 Values: DEIS for Bel-Red Corridor Project

Avg. Incr. 2005-2030
 A1,A2,A3=1.34
 NoAct =1.14 With Imprvmts

hour period, while the DEIS analysis is a 1-hour period. As a result, the two analysis methodologies should not be compared. However, as expected, for all but one of the intersections listed in the table, intersections operate the same or worse over the 1-hour period when compared to the 2-hour analysis period, providing confidence that the analysis is correct.

Intersections analyzed in the DEIS were qualitatively selected, with emphasis given to arterial intersections within the Bel-Red Corridor study area first. Then, intersections outside the study area were selected to determine if there were impacts along significant arterial intersections with connections to regional freeways (hence intersections near I-90 at Eastgate and SR 520 near Bellevue Way). Remaining intersections are either within Redmond city limits and were analyzed to provide Redmond impacts, and/or at gateways to neighborhoods to monitor potential traffic infiltration into neighborhoods.

Transportation improvements assumed for each alternative are clearly listed in table 10-5 and Appendix G of the DEIS.

Although the DEIS provided bi-directional traffic volumes on various arterials in the Bel-Red Corridor, the volumes simply need to be added together if comparison is desired to the City's Annual Count book.

David Plummer-103a

See response to David Plummer-94a.

David Plummer-104a

There were four mode categories documented in the DEIS: SOV, HOV, Transit trips accessed by park-n-ride, and transit trips accessed by walking. Table MS 999 provided in your comment letter contains a table heading called "P&R pedestrian," which presumably is intended to be transit trips

Comments

Table MS 999. Mode Split Values from Various Sources

Source	Predicted Mode Split, Percent				Mode Split Applies to Area
	SOV	HOV	P&R Transit	P&R Pedestrian	
DEIS No Action	86	4-5	1-3	7	Bel-Red?
Action #1	75-80	4-5	1-3	13-18	Bel-Red?
Action #2					
Action #3					
PSRC Vision 2020 Plus 20 DEIS	76	?	9-12 (Work trips)	?	RSRC 4-County
WSDoT Cong Rel. Anal.	87(?)	7	6 (Value is for both modes.)		WSDoT Cent. Pug. Snd.
BKR 2004 (June 2005)	82,6	9	0.8	7.6	CoB
King Cnty Bnchmark	70 (2004)	10 (2004)	9 (value is for both Modes)	2004,	King Cnty.

Source:

1. DEIS: Bel-Red DEIS; City of Bellevue; 25 January 2007
2. PSRC Vision 2020: DEIS for PSRC Vision 2020 + 20 DEIS; PSRC, 2006.
3. WSDoT Cong. Rel. Anal.: Congestion Relief analysis, Central Puget Sound WSDoT; Olympia, March 2006.
4. BKR 2004: "2004 Base year BKR Modle Report;" City of Bellevue Transportation Dept., Bellevue, 30 June 2005.
5. King Cnty Benchmark: King County Benchmarks Report; 2006; Transportation; King county Metro, May 2006.

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accessed by walking. It is important to understand that these are not only park-n-ride transit trips.

The mode choice data provided in the DEIS is for the Bel-Red Corridor area, only, and do not include the rest of the City of Bellevue, nor the BKR model, nor the PSRC.

It is difficult to make comparisons of any data and analysis between documents and jurisdictions. The intent, of course, is for the data and analysis provided in this DEIS to be used only within the context of the DEIS so that comparisons can be made amongst alternatives, rather than for data published in this DEIS to be verified with other sources. There are so many variables that could have an impact on how any of the sources cited in your comment letter (PSRC, WSDOT, King County) would have differing mode choice results. Even the comparison to the City of Bellevue BKR report is difficult to compare to because the mode choice results documented in that report reflect existing conditions for the whole BKR model, as opposed to 2030 results for the Bel-Red Corridor in the DEIS.

In general, though, the Bel-Red Corridor DEIS results are fairly comparable to the other sources provided in your comment letter if you take into account that the Bel-Red Corridor DEIS mode choice numbers are for a smaller geographic area with limited HOV facilities and no park-n-ride facilities within city limits in the corridor.

David Plummer-105a

See response to David Plummer-102a.

David Plummer-106a

Although detailed information regarding Sound Transit's light-rail transit (LRT) system is not yet decided, the City coordinated closely with Sound Transit to ensure that LRT assumptions for the Bel Red Corridor DEIS were reasonable

Comments

- 107 2.8.5 All construction and operation impact/mitigation material on pages 10-47 through 10-49 in this chapter should be deleted, as this is a non-project DEIS.
- 2.9 Chapter 11
- 108 2.9.0 All the material in this chapter should be greatly generalized to remove the excessive and speculative detail as this is a non-project DEIS, and no specific developments are proposed. The impacts on public services and utilities can only be reasonably assessed when specific proposals are advanced under the revised Comprehensive and Subarea plans, revised Land Use Codes, etc.
- 2.10 Appendix F
- 109 2.10.0 Delete this entire appendix, as it is far too detailed for a non-project DEIS.
- 2.11 Appendix H
- 110 2.11.0 Delete this entire appendix, as it is far too detailed for a non-project DEIS. Any speculative impact assessments of the No-Action and Action alternatives (e.g., as detailed in Tables F-2 and F-3) have no relevance for a non-project DEIS, as no developments are proposed under this DEIS.

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and based on the latest assumptions made by Sound Transit at the time of publication. The presence of LRT within the Bel-Red Corridor is an opportunity that could not be ignored when analyzing the transportation impacts of the proposed action. Given that LRT will be a new form of transportation within the corridor, it was important to disclose detailed data on this mode so that decision-makers could be aware of all assumptions and related results, whether positive or negative.

David Plummer-107a

See response to David Plummer-103a.

David Plummer-108a

See response to David Plummer- 97a. While no specific projects are currently proposed, it is appropriate to analyze impacts based on the expected residential and employment population increases expected to result under each of the alternatives. This allows for the relative comparison of potential impacts among alternatives, as required by WAC 197-11-442(2). Impacts will be further identified as specific land use or transportation projects are evaluated under the SEPA process.

David Plummer-109a

Comment noted.

David Plummer-110a

See response to David Plummer- 11c.

Comments

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Page 1 of 1

O'Neill, Kevin

From: Alan Carr [akrcarr@comcast.net]
Sent: Sunday, March 11, 2007 8:55 PM
To: BelRed
Subject: DEIS comments

It is difficult to find the time to review and comment on this large volume of material. I was unable to download Chapter 6 of the DEIS on the City's website. It appears that the negative impacts of the proposed rezones have been downplayed.

1 The chapter 1 summary attempts to lay waste to the No Action Alternative by stating "without changes to the existing land use designations and zoning, it would be difficult for these stations to realize their full potential to support the LRT ridership". I believe it is unacceptable for the City of Bellevue to tell us that in order to make the LRT cost-effective, we should remake the surrounding neighborhoods. LRT must stand on its own merits or be canceled!

2 Air quality Table 3-3 shows increases in all categories of emissions above those of the No Action Alternative. Yet the report concludes no adverse air quality impacts. It appears to me that alternatives 1, 2 and 3 lower the air quality in my neighborhood when compared to the No Action Alternative. While it may not violate recognized air quality standards, more carbon monoxide in the air we breathe is an adverse impact on my family. Furthermore, the operational impact section under Air Quality states that maintaining traffic flow will reduce idling and therefore, reduce emissions, but it is difficult to tell what traffic flow steps will be taken. Currently even when roads are clear, it is all too common that we must sit and idle in a left turn lane when there is no oncoming traffic. With rare exceptions we are over-regulated by left turn arrows that force us to wait and burn gas. It is unclear to me what measures the city has in mind to improve flow, because there are improvements that could be made today if the city wished to reduce emissions by improving traffic flow.

3 My family has routinely patronized many businesses in the Bel-Red Corridor over the last 15 years. Many of these businesses have been fixtures in our community and they should be permitted to remain right where they are. Compared to alternatives 1, 2, and 3 the current zoning mix serves the existing community just fine. The proposed rezones will adversely affect small business owners. Offering the ability to relocate is not always a good alternative for some businesses as this will cause some to just close their doors. Once such businesses are lost they are gone – and there is no guarantee that a replacement will provide the same services. It appears to be an oversight that current business owners have not been adequately represented on the steering committee.

Alan Carr
 1009 141st Place NE
 Bellevue, WA 98007

Alan Carr-1d

See Alan Carr-6c. Transportation and land use considerations are inter-related, as acknowledged in the Bel-Red Corridor Planning Principles adopted by the City Council. These planning principles include Light-Rail Transit (LRT) as an Opportunity (Principle 5) and Land Use/Transportation Integration (Principle 6). The Bel-Red Corridor Project approaches LRT as an opportunity and aims to create a land use vision that is supported by multimodal transportation improvements. Neighborhood Protection, Enhancement, and Creation is also a project planning principle, and implies including strategies to mitigate potential neighborhood impacts related to future Bel-Red Corridor development (Principle 8). Refer to DEIS pages 1-4 to 1-6.

Alan Carr-2d

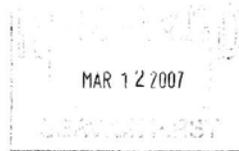
See response to Alan Carr-7c.

Alan Carr-3d

See responses to Bridle Trails Community Club-8 and Alan Carr-11c.

Comments

Michael H. Yuhl
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 425-747-2177
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March 9, 2007

Carol Helland, Environmental Coordinator
 City of Bellevue
 P.O. Box 90012
 Bellevue, WA 90012

Re: Bel-Red DEIS – Zoning Change Results in Non-Conforming Use

Dear Ms. Helland:

We are owners of a building at 12828 Northup Way. All three alternates propose to change the zoning from LI to Retail/Commercial (presumably GC).

These properties are small, in part, due to the freeway condemnation for the relocation of Northup Way west of 130th.

1. That change will render our building non-conforming, because it's over the 30 ft. height allowed in GC. (It was built to conform to the LI height of 45 ft.)
2. There are thirteen properties that are north of Northup and between 124th and 130th. One is undeveloped. Of the remaining twelve, seven don't have direct access to Northup. The five properties that do access share two driveways. The west most driveway is steep and the east driveway has reduced entering sight distance. When the road was 5-laned, the high traffic volumes and speeds made entering difficult. Designating this property commercial would increase the turning traffic and be in conflict with Policy S-BR-25, ref. Pg. 7-13.

This strip of properties is clearly not suited to retail/commercial.

Sincerely yours,

Michael & Colleen Yuhl

Responses**Michael & Colleen Yuhl-1**

The exact zoning provisions for this area have not been defined. The intent of the Steering Committee is to generally not create nonconformities. This has been a central issue when discussing existing light industrial and service uses.

Michael & Colleen Yuhl-2

The Preliminary Preferred Alternative for this area envisions a future land use type and intensity similar to that which is allowed under the existing zoning. The specific zoning category and the allowed uses and intensities have not yet been determined.

Michael Yuhl-1a

Comment noted. Specific zoning designations have not been determined, but property rights of property owners regarding their existing uses will be an important consideration in developing changes in land use and zoning designations. The Steering Committee direction on the future zoning is to create no nonconforming uses. Implementation strategies (zoning) will be developed for review by the Planning Commission and City Council.

Michael Yuhl-2a

Comment noted. Future development would be consistent with the policies and regulations existing at the time of permit application. Specific development standards have not been prepared, but will be a component of the implementation strategy.

Comments

Responses

Michael H. Yuhl
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Michael Yuhl-1b

Comment noted. The purpose of the Bel-Red Corridor planning process is to envision future land use and transportation system changes, and the DEIS analyzed those potential changes on a programmatic level, not on a site-specific development level. Housing types and densities envisioned in the vicinity of potential future light-rail stations have been shown through case studies in other communities to be achievable.

March 11, 2007

Carol Helland, Environmental Coordinator
City of Bellevue
P.O. Box 90012
Bellevue, WA 98012

Re: Bel-Red DEIS – The 75-80 du/acre Projected Density

Dear Ms. Helland:

This letter addresses the projected density of 75 to 80 dwelling units per acre near the LRT stop on 130th for Alternates 2 & 3.

On Attachment 1, I've calculated what's achievable on a typical parcel on 130th and concluded that, with present parking requirements, the achievable density is under 40 du/acre. (Higher density could be achieved if the entire block was one parcel, because it would eliminate the need for interior lot line landscaping and cover a higher percentage of the land.

The DEIS should be supplemented with calculations on how this 75 – 80 du/acre density is achieved, or what reduction in parking would be needed to achieve that density.

Sincerely yours,


Michael H. Yuhl

Comments**Responses**

Page 1 of 2

Attachment 1
To letter to City dated 3/11/07
By Michael Yuhl

- 2 | What is the maximum housing over business density under present codes?
- 3 | Housing density of 75-80 units per acre are forecast for Alternate 1 & 2 (Ref pg. 2-12 and 2-14). The higher densities do not depend on LRT as stated on page 2-6. That means on-site parking must be provided.
1. Plans 2 & 3 show mixed use housing/commercial center at 130th & 16th. (There are about 80 properties within ¼ mile of this intersection.) Those plans show blocks about 330 ft. square. Figure 6-1c shows property lines at a scale of approximately 1" = 1000'.
 - 4 | 2. How could this site be re-developed? Take an existing site on the east side of 130th, north or south of future 16th. These sites are about 200 ft. on 130th and 230 ft. E-W. These sites will have to dedicate at least 30 ft. for future 16th. Redevelopment will require 10 ft. of landscaping along street frontages and 6 ft. along interior property lines. That means the development footprint is 200 ft. on 130th frontage, less 30 ft. ROW for 16th, less 10 ft. + 6 ft. landscape = 154 ft. The E-W 230 ft. – Landscaping will reduce the site by 10 ft. in front and 6 ft. in back = 214 ft.
 3. Development Basics: The restraint on development is the number of parking places. Under this scenario, assume the entire site is covered with parking. (A building will be built above some of this parking.) 90° 2-way double loaded aisle with double striping is selected. The least land area per car is the 62'-8" wide lot with 8'-4" wide stalls. (That's 261 sf/car. Actual space is 261 sf + 17.5 sf of landscaping requirement = 279/sf/stall.) That assumes parking regular cars which require 18 ft. deep stalls, and a 28 ft. aisle. If all compacts were assumed, the stalls could be reduced to 14.75 ft. and the aisle reduced to 22 ft., but the Code requires that each size be accommodated.
 4. The development area calculated above is 154 ft. x 214 ft. The 62'-8" parking lot width is the controlling dimension. It divides into 154 ft., 2.45 times and into 215 ft., 3.43 times. The building will be set north-south with a parking lot on the east and west.
 5. The maximum building length could be 154 ft., however it should be a divisible by the width of a pair of parking places (16—8") for building structural purposes. That would make the building 9 bays long or 150 ft. the building would need to be at least 62'-8" wide in the garage for parking. Use 64 ft. outside dimension.
 6. The garage would park 36 cars. Two spaces would be lost because an access ramp would be needed and another two lost due to an elevator and stairs. That leaves 32 spaces.

Michael Yuhl-2b

Very generally, under existing zoning, potential allowable housing density in commercial zones is as follows:

Professional Office – 10 units per acre

Office – 20 units per acre

Office/Limited Business - 30 units per acre

Light Industrial - housing not permitted

General Commercial – housing not permitted

Community Business – 30 units per acre

Michael Yuhl-3b

Comment noted. While the details of future zoning have yet to be determined, it is likely that most new development, even in the vicinity of a light-rail station, would be required to provide some onsite parking.

Michael Yuhl-4b

See response to Michael Yuhl-1b.

Comments

Responses

Michael Yuhl-5b

Comment noted.

Page 2 of 2
3/11/07

7. The two outside lots would each have a potential for 36 spaces. One lot would lose two spaces for the ramp down to the below grade garage. That would leave $32 + 36 + 34 = 102$ parking places.
8. Final grade would be adjusted so the garage was below grade, and hence the floor above, the business floor, at grade. Assume this $64' \times 150'$ floor could have a multiple of uses. The gross area is 9600 sf. Deduct $5'$ for exterior walls + $16-1/2 \times 13'$ for an outside elevator/stairs/hall to connect garage to residences + 2 end stairs at $7' \times 14' = 590$ sf. Say 9,000 net sf divided by 250 sf/park places = 36 parking places required.
9. 102 total parking spaces – 36 = 66 parking places available for residences above. LUC requires 1.6 parking places per 2 BR unit. 66 divided by $1.6 = 41$ apartments. Per DEIS, a 2 BR apartment average is 1200 sf. 9000 sf per floor divided by $1200 = 7.5$ units per floor. 41 units divided by $7.5 = 5-1/2$ floors.
10. This scenario doesn't use up the entire site. The 214 ft. E-W is occupied by two $62'-8"$ lots + $64'$ building allows for $5'$ of landscape between parking lot and building. The development occupies 199 ft. whereas 215 ft. is available.
11. The development density is: On a gross-using dimension to center of abutting streets $200' \times 260' = 1.19$ acres. 41 units on 1.19 acres is 34 du/acre.
12. In the above scenario, $13' \times 170$ ft. of the site isn't needed. If that was subtracted out, the gross density would be 36 du/acre.
13. If a second parking floor was needed, the 32 additional spaces would support 20 additional units. That would be 51 du/acre. It's not practicable to assume that a 2nd level of parking could be achieved due to the needs for ramps to reach the above grade floor.
14. Conclusion: The projected redevelopment to 75 – 80 du/acre is not achievable for this size or smaller site.
15. What happens if the ground floor commercial is parking for multifamily? That would increase the 102 spaces by an additional 32 for a total of 134. With 2 BR units, that parking would support 134 divided by $1.6 = 84$ du/acre. At $7-1/2$ units per floor, that would require 11 floors and the ground floor. That's too high. Instead of an 11-story building over one of 3 parking lots, it would be two buildings over 2 of the 3 parking lots.
16. The gross density would be 70 du/acre, but there would be no commercial use.

5

Comments

Michael H. Yuhl
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March 10, 2007

Carol Helland, Environmental Coordinator
City of Bellevue
P.O. Box 90012
Bellevue, WA 98012

Re: The Area North of Northup Way
Bel-Red DEIS Retail/Commercial in all 3 Alternates (LTR 2)

Dear Ms. Helland:

All three alternatives show the area North of Northup Way/20th between 121st to about 135th to be changed from LI to Retail/Commercial.

1 A. Figure 1 of the Leland Report shows 11 subareas on page 2, but only discusses 9 of these on pages 4 & 5. The reasons why these two areas were omitted from the Leland Study should be provided.

2 B. The description of this area on page 1-4 is virtually the same as page 5 of the Leland Report, yet the size of this area now includes one of the unidentified areas in the Leland Report. The land use description identified Lowes, Tap Plastic and Smith & Hawkins, and a large amount of mini-storage space. No mention is made that the predominate use of the area is single story office. This needs to be explained in the FEIS.

C. The DEIS data referenced below doesn't support a need for expansion of the retail/commercial zone by approximately 1,300,000 sf of land area, because:

1. Table 7-2 shows the projected retail use between 200,000 and 500,000 sf. (That number appears to come from Table 7 of the Leland Report, which shows this need within a 3-mile radius.)

3 2. Page 37 of the Leland Report points out that the Bel-Red area has 2.5 times as much space as the County-wide average. This report goes on to say that downtown Bellevue will capture much of the growth in retail space need, and, except for restaurants, the additional office development will produce little additional demand.

3. There are vacant available sites, i.e. K-Mart Plaza on Main & 148th.

All data and reasons that support the conclusion that more retail/commercial is needed should be included in the FEIS.

Responses

Michael Yuhl-1c

The commercial strips along Northup and Bel-Red Road were not identified and analyzed as distinct clusters in the study prepared by Leland Consulting Group. This is because, as the study indicates, these commercial strips defy easy categorization because they include diverse uses such as showrooms, offices, and storage yards. See DEIS Appendix B, page 2.

Michael Yuhl-2c

The FEIS will accurately describe the land areas potentially impacted by changes to the land use and transportation vision embodied in the Preliminary Preferred Alternative.

Michael Yuhl-3c

The retail market forecast was based on existing and anticipated growth in population within a 3-mile radius of the Bel-Red Corridor and an evaluation of other close-by retail markets. Given the existing retail concentrations in Downtown Bellevue, Crossroads, Overlake, and within the Bel-Red Corridor itself, the conclusion was that some additional amount of retail could be supported but not a great deal, hence the estimate of 200,000 to 500,000 square feet of new retail use. Many existing retail uses may redevelop over the time horizon of the plan as well.

Comments

D. These should be explained:

1. On page 7-29, it's stated that the area along the study area's northern edge would continue to provide a mix of retail services in lower scale buildings. Development intensities would not exceed what currently exists; therefore, these uses would remain compatible with adjacent and nearby residential and commercial uses to the north in "the Bridle Trails Neighborhood". On page 9-5, the existing scale of the built environment is described as "medium to medium large". On 7-29, the redevelopment would be "in lower scale building".

2. The existing buildings are predominately one story. How is redevelopment to achieve a lower scale building than exists.

3. The statement of lower scale and development not exceeding what currently exists essentially locks in land values, while the values in the rezoned area rises. Freezing land values along 520 favors selective transfer of property.

4. The existing buildings are primarily one-story and over 600 ft. away from Bridle Trails. This exceeds the LI setbacks in other areas of the City. There are two-story buildings on the south side of 24th across the street from Bridle Trails.

5. The idea that the rezone is to have this LI remain compatible with GC is puzzling. The landscape provisions allow the 6 ft. of side line landscaping to be relocated between LI & GC. If these uses are so incompatible, why is that provision in the landscape requirements?

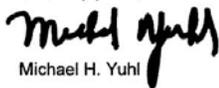
E. The third paragraph on page 2-13 stated "This area – which is not in the vicinity of a LRT station or surrounded by proposed higher intensity development...".

6. "...not in the vicinity or surrounded by proposed higher intensity development" applies to other areas. Essentially that says if the area is ¼ mile or more from an LRT station or surrounded by proposed higher intensity development. There are many other areas that are just as far from an LRT station and not surrounded by higher intensity development, but were not shown retail/commercial. The reasons for these rezones should be explained fully, with logic, and shown that the logic is uniformly applied.

7. F. The cost of land along the proposed 16th route should be much higher as the land use plan shows a much higher density. This would increase the cost of acquiring this land for 16th and the LRT route, because the highest and best use would indicate more land value. Wouldn't it make more sense to down zone the property where land is needed for the LRT on 16th?

8. G. Many of the uses permitted in the GC zone are also permitted in the LI zone, if located in a multiple function building or complex. What is the need that requires a GC zone that could not be accomplished in the LI?

Sincerely yours,



Michael H. Yuhl

Responses

Michael Yuhl-4c

The Bel-Red Corridor land use vision anticipates redevelopment of this area over time, in a manner consistent with the existing zoning, which is not necessarily reflected in the existing structures. Redevelopment could occur that results in taller buildings than those that currently exist, and they may occupy a greater portion of the site. The intent is to retain the potential development intensity allowed by the existing zoning.

Michael Yuhl-5c

Comment noted. Future zoning for the Bel-Red Corridor will likely result in landscape requirements different than those under the existing code to reflect the changed land use vision.

Michael Yuhl-6c

The intent of retaining the lower intensity land use on both the north and the south edges of the Bel-Red Corridor study area is to provide a transition to the adjacent lower density neighborhoods, in accordance with Bel-Red Corridor Planning Principle 8.

Michael Yuhl-7c

Comment acknowledged. If land use and zoning designations change, land within the core of the area may become more expensive. However, land use and zoning designations near potential light-rail transit (LRT) stations should be able to support LRT; therefore, as is the case in the action alternatives and the Preliminary Preferred Alternative, intensities are assumed to be higher in at least some parts of the NE 16th Street corridor, assuming that is the alignment chosen by Sound Transit for LRT.

Comments

Responses

Michael Yuhl-8c

Specific zoning designations have not yet been determined. This will be accomplished in a separate public process in accordance with City Council direction developed as part of a holistic implementation strategy.

Comments

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March 12, 2007

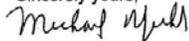
Carol Helland, Environmental Coordinator
 City of Bellevue
 P.O. Box 90012
 Bellevue, WA 98012

Re: Bel-Red DEIS Stream Impact

Dear Ms. Helland:

- 1 The three alternates shown in the DEIS all utilize the same alignment on 16th. The fundamental purpose of the EIS process is to explore a range of options which could eliminate or mitigate the proposal's impact on various components of the environment.
- 2 Extending 16th westward on Figure 1 of the Herrera inventory reveals that alignment will impact approximately 400 ft of the west tributary west of 127th bridge.
- 3 Even though this is a non-project EIS, I believe the FEIS should not show an impact that cannot be constructed without an impact on the stream and/or buffer. I believe the FEIS needs to discuss avoiding the impact by either relocation or elimination of this crossing.

Sincerely yours,


 Michael H. Yuhl

Responses**Michael Yuhl-1d**

See response to Sound Transit- 6a. The planning process that led to the development of the alternatives studied in the DEIS produced a transportation corridor along an alignment of NE 16th Street. No other alignment was conceived that was deemed viable for further analysis. The EIS process need not explore all possible options.

Michael Yuhl-2d

Figure 1 of the Herrera inventory is a planning-level illustration. The actual alignment of any road extension would be made to avoid or minimize impacts to streams, wetlands, and buffers. If impacts were unavoidable, then efforts would be made to cross at locations with already degraded conditions, and additional mitigation improvements would be implemented.

Michael Yuhl-3d

See response to Michael Yuhl-2d. Additional project-level review will be necessary.

Comments

Page 1 of 3

Helland, Carol

From: Renay Bennett [renaybennett@msn.com]
Sent: Thursday, March 08, 2007 6:58 AM
To: Helland, Carol
Subject: Re: DUE March 12 - Bel Red DEIs comments

Thanks for the note Carol.
 Renay

----- Original Message -----

From: CHelland@bellevuewa.gov
To: renaybennett@msn.com
Cc: KMcDonald@bellevuewa.gov ; KONEill@bellevuewa.gov ; MPaine@bellevuewa.gov
Sent: Wednesday, March 07, 2007 9:27 PM
Subject: RE: DUE March 12 - Bel Red DEIs comments

Renay - I am in receipt of your comments on the Bel-Red Corridor Project DEIS.

Carol V. Helland, Land Use Director
 City of Bellevue
 Dept. of Planning & Community Development
 PO Box 90012
 Bellevue, WA 98009-9012
 425-452-2724
 Fax: 425-452-5225
 chelland@bellevuewa.gov

From: Renay Bennett [mailto:renaybennett@msn.com]
Sent: Wednesday, March 07, 2007 5:39 PM
To: BelRed@bellevuewa.gov
Cc: Helland, Carol
Subject: DUE March 12 - Bel Red DEIs comments.

http://www.bellevuewa.gov/pdf/Transportation/Ch11_PublicServicesandUtilities.pdf

Subject: DEIS for Bel-Red Corridor Study comments

This DEIS is wholly insufficient and fatally flawed in its analysis with regard to increased needs of future housing and commercial development and their impacts in and around the Bel-Red corridor and the city as a whole. It is concerning that this analysis exhibits so little care for the public safety.

Electrical Power.

The DEIS fails to identify what planned facilities may need to be built to accommodate future increased development and rezoning, only hazily mentioning the need for it, if needed. The locale of such a transmission switching stations and distribution substation, along with their associated transmission lines and distribution circuits is stated to be somewhere near 520, between 135th and 140th. This could be in or near residential areas,

Responses

Renay Bennett-1

Comment noted. See responses to more specific comments below.

Renay Bennett-2

See response to Bridle Trails Community Club- 13. The discussion of the proposed distribution substation and transmission switching station near the SR 520 corridor was taken from the City's *Comprehensive Plan*. The need for this station is based on anticipated growth of electricity demand in the overall area and is not a result of the Bel-Red Corridor Project. When the facility is designed, it will take into account both the existing and projected electrical loads in the area.

Comments**Responses**

Page 2 of 3

which would be not be able to be mitigated and would probably be heavily opposed by residents.

Water.

The DEIS fails to address increased water usage that will result from the proposed increases in development in the Bel-Red corridor. The system that is there is insufficient to provide water to any real level of increased residential or commercial development. Though there is a scheme via the Cascade Water Alliance, this group will not be able to provide clean drinking water to these new developments as the Cascade Water Alliance is trying to use human use and commercially contaminated water as drinking water. This will never pass muster with officials charged with public safety and those concerned with water quality and its effects on humans and animal life, including aquatic life. As a member of the Downtown Implementation Plan, I specifically asked for plans to provide clean water for the new development in the downtown. No such action was taken.

Fire Protection and Emergency Medical Services.

The analysis of future needs for fire service is fatally flawed. The proposals for increase in development would necessitate a new fire station. One need only look how this need is most evident in a redevelopment and upzone scenario as is occurring in the Bellevue downtown. Significant growth in the form of high rises is occurring without the fire support that is needed to address the special requirements needed to continue Bellevue's tradition of 6 minute response time. This is dangerous to the residents of Bellevue. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

With increased multi-family development and commercial development comes crime, as evidenced in the Bellevue downtown. No planned new additions of police personnel to keep residents and properties safe from criminals shows a fatally flawed approach to this analysis, as well as disdain for residents and property owners safety.

Schools.

This analysis is fatally flawed. As has been evidenced in the Bellevue downtown, new families moving in are putting tremendous pressure on our local schools. No property is planned for schools in this area, yet massive multi-family development is planned - and these folks will definitely have children. The analysis states that "District enrollments are based on past actual enrollment and do not routinely factor in new housing units, except as children of new residents are enrolled. There are no schools located in the Bel-Red Corridor study area." This is proof of the un-intelligent mis-reasoning that is evidenced throughout this analysis. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

I have limited my comments to the issues above, however, there are many more instances of fatally flawed analysis. It is a shame that this is costing the taxpayers of Bellevue so much - and who will receive no benefit. The No-Action alternative must be chosen. The residents and taxpayers of this city deserve to be protected from the encroachment and unmitigated impacts that will occur with the other alternatives - and the only way to do this

Renay Bennett-3

The DEIS recognizes that the No-Action Alternative or action alternatives would result in differing demands on water and wastewater utility distribution and collection systems to support additional employment and population in the study area. As stated, the City will need to analyze utility capacity to serve the adopted Preferred Alternative and associated land use plan.

Bellevue's water supply is provided by Cascade Water Alliance (CWA), which purchases a block of water from Seattle Public Utilities (SPU). Per the CWA's contract with SPU, that block will decline over time, and CWA will add other water sources over time. Any supply gap will be responded to in accordance with CWA's *Transmission Supply Plan* for water shortages. Changes to Bellevue's forecast long-term water demands based on increased densities will be communicated to the regional provider (CWA) when they are determined.

See response to Peter Mears- 14. Discussions with representatives from the water and sewer utilities, done as part of this EIS analysis, indicated that both utilities expect to be able to accommodate the proposed levels of development while maintaining service to existing customers.

Renay Bennett-4

See response to Peter Mears- 12. Development is anticipated to occur incrementally over a 24-year planning horizon, regardless of the alternative implemented. According to conversations with the Bellevue Fire Department and the Bellevue Police Department, it is expected that additional police/fire/EMR staff would be required and employed to service the new development as well as adjacent areas. This would likely be addressed through incremental staffing increases and capital facilities planning over the planning horizon.

Comments

Page 3 of 3

is for the council to choose the No-Action alternative.

Respectfully submitted,
Renay Bennett

Responses

Renay Bennett-5

See response to Renay Bennett-4.

Renay Bennett-6

See response to Peter Mears- 11.

Renay Bennett-7

Comment noted.

Comments

Responses

03/08/2007 15:22 425-883-8856

MERRITT

PAGE 01

faxed 3/8/07
452-5247

Please email me verification of receipt (address below) 4 pages total

TO: City of Bellevue 3/4/2007
 From: Heidi Benz-Merritt, 20 year resident of Compton Glen 3006 130th Place NE, 98005 heidibenz@verizon.net (425) 883-8856
 RE: Comments for inclusion into FEIS for BEL-RED CORRIDOR PROJECT, NO ACTION ALTERNATIVE RECOMMENDATION

Heidi Benz-Merritt

1

It appears that the underlying rationale for conducting this environmental study, is to justify an massive upzone of the Bel-Red business corridor, with the objective of influencing the location of a new fixed-rail line and the related transit stations. Not only does this contradict the axiom learned in "Planning 101" - that Land Use Drives Transportation", but there is no demonstrable need (social, political, economic or otherwise) that this huge build out is needed now- or 20 years in the future.
NO ACTION should be the **PREFERRED ALTERNATIVE**, with rationale, and DEIS deficiencies listed below.

1. HOUSING (Chapter 8)

2

This section is devoid of any useful data, and needs to include essential information regarding the City's progress on meeting our housing targets mandated under the Growth Management Act. Kevin O'Neill, Bellevue City Long-Range Planner, cites the following figures in an email dated 3/1/2007:

"The housing target in the current comp plan for the period 2002 to 2022 is 10,177 new households. Since the beginning of 2001, there have been 1,296 net new housing units constructed in Bellevue. However, there are another 2,000+ units in various phases of construction in Bellevue (most of them obviously in downtown), which, depending on when they are completed, would put us much closer to staying on target."

3

Given these data, there are at least 3300 new housing units built, or currently under construction in the first 5-6 years of the 20 year planning period through 2022. This represents about ONE THIRD of the projected target of 10,177 new units, in less than ONE THIRD (6 years) of the 20 year time span. In other words, Bellevue is AHEAD of its housing targets, and is far ahead of many of the surrounding communities on the Eastside (Extrapolating the data using the 2030 horizon year would presumably yield the same results).

GMA housing targets aside, Housing/Economic forecasts past 3-4 years are fraught with error, and give little more than a Ouiji-Board guesstimate of future market conditions. In short, numerous factors outside the City's control will dictate how much, when, and in what location future housing will be built.

4

Existing residential zoning already exists to accommodate future growth in Bellevue. The Housing Policies (HO-2,11,13,25 on pages 84 and 85) are already being implemented all around the City. To include them in this document gives the erroneous impression that somehow we need to allow housing into the Bel-Red area - so that we can comply with existing policies. The opposite is true, since housing targets have been met or exceeded - WITHOUT adding even one residential unit to the Bel Red area.

5

a. DELETE these housing policies from the DEIS, since they are not supported by existing Bellevue Comp. Plan.

Heidi Benz-Merritt-1

See response to Stacy LeBlanc- 1.

Heidi Benz-Merritt-2

See David Plummer-98a. The City is making progress in terms of meeting its 2002 to 2022 housing target of 10,117 new units during this timeframe. As the City looks out beyond the current *Comprehensive Plan* and Countywide Planning Policies timeline of 2022 (to 2030 and beyond), it will likely become more challenging to accommodate future housing targets, as the Downtown area (the City's primary growth center) becomes more built out.

Heidi Benz-Merritt-3

Comment noted. Population, housing, and employment forecasts are developed by the Puget Sound Regional Council (PSRC), based on a number of factors, predominantly forecasted growth of the regional economy. While the rate of housing and population growth varies over time for a number of reasons (again, largely driven by economic factors), based on current forecasts, population growth will continue to be robust in the central Puget Sound region in the next several decades; current PSRC forecasts show 1.6 million more residents in the region between 2000 and 2040.

Heidi Benz-Merritt-4

See response to Heidi Benz-Merritt -2.

Heidi Benz-Merritt-5

The policies cited in the document are in the existing Bellevue *Comprehensive Plan*.

Comments

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MERRITT

PAGE 02

2

- 6 b. ADD thorough discussion of GMA housing targets, and historical discussion of how Bellevue's housing growth has compared to other eastside communities (parity).
- 7 c. ADD historical discussion as to why Bellevue Comprehensive Plan promotes/encourages new housing concentrated in the CBD, Crossroads, and existing residential areas, rather than in Bel Red. The DEIS alludes to this, but falls short in providing any historical context in this one sentence: "*The Bel-Red/Norhip Subarea Plan (of the Bellevue Comp Plan), does not include a household growth target.*" Page 84
- 8 d. Microsoft is in Redmond, and housing growth, mixed use development, and construction of amenities (parks, trails, local rail infrastructure) to support that growth should occur, and be paid for, by Redmond, not Bellevue. Bellevue has already been very generous in the "foreign aid" department, and Redmond's turn to pay its fair share - is long overdue.

2. ECONOMICS (Chapter 8)

9 The discussion of Economic impacts also totally misses the mark, and is devoid of any substantive information to support getting rid of the existing zoning in the Bel-Red/study area. Instead, this section is filled with tables of irrelevant job/employment job growth numbers extrapolated from 30 year government projections from PSRC, and a rather unbalanced, biased discussion of a "market analysis of the Bel-Red corridor: commissioned by the City.

10 "*by 2030, the (Manufacturing) sector is expected to decline by 18% or 1500 jobs*". P.8-6. *With mechanization, outsourcing, and the global economy, this misleading statement brings to mind the teenage retort: "DUH...!"*

REPLACE this statement with relevant data about Manufacturing/Warehouse businesses in the Bel-Red study area. These data should include at least the following:

- 11 • A. The number of Manufacturing and warehouse-dependent businesses in Bel-Red, total/projected payroll, current and projected tax revenue numbers. Why use goofy 30 year projections, when actuals are available from businesses already operating in the study area?
- 12 • B. Discuss and compare current and projected City B&O, utility tax, sales tax, property tax, and other revenue obtained from existing businesses in entire Bel-Red study area with preferred NO ACTION and other alternatives. *Obviously, the City has all these economic data, and its conspicuous absence from this document bodes the question: Why has it all been left out?*
- 13 • C. For each of the Alternative Scenarios, calculate the LOSS of payroll, and other tax revenue to City, etc. for these existing businesses, that would no longer be permitted uses.
- 14 • D. Discuss actual expansion requirements (land needs, transportation access, location to customers, other suppliers,) that existing businesses need in order to continue operating, and where they would find these, if made to leave Bel-Red.
- 15 • E. Analyze/report indirect economic impacts. This should include survey data from every manufacturing/warehouse-dependent businesses currently in Bel-Red - to include questions such as: "Can you afford to pay higher taxes and keep your business in Bel-Red, should your existing location be upzoned?" "If your business's underlying land-use is changed, will your business close? Relocate? If so, where, and at what (\$\$\$) economic cost? "Would your business be able to absorb the costs of relocation, and if so, how would you absorb/pay for these costs (i.e. higher prices for goods/services)?"
- 16 • F. Economic (tax/payroll, etc.) impacts of losing LI/warehousing/truck-trade companies. (Even if existing LI businesses are grandfathered in, the very "market forces this study aims to control - will eventually force them all out anyway.

Heidi Benz-Merritt-6

See response to Heidi Benz-Merritt-2. The FEIS does not include a comparative analysis of Bellevue's housing targets relative to other cities.

Heidi Benz-Merritt-7

Comment noted. The City's *Comprehensive Plan* has historically, and still does, identify Downtown Bellevue as the City's primary growth center, and it is anticipated that this will continue to be true in the future (see David Plummer-7b and -19a). As indicated in Chapter 7 of the DEIS, there are also numerous policies in the existing Bellevue *Comprehensive Plan* that provide policy support for evaluating, and potentially changing, land uses in the Bel-Red Corridor. Refer to the City Council Bel-Red Corridor Planning Principle 8, which directs the Steering Committee to consider a vision in which new neighborhoods are created.

Heidi Benz-Merritt-8

Comment noted. Redmond is in the process of updating their *Overlake Neighborhood Plan*, which is looking at increased growth and infrastructure and amenities to support it. As both cities plan to 2030, the current Bel-Red/Overlake Transportation Study (BROTS) agreement (which only looks out to 2012) will need to be updated (see Coca-Cola Real Estate-1). The update should include how each city will reimburse the other for impacts associated with growth in the adjoining city.

Heidi Benz-Merritt-9

Comment noted.

Comments

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MERRITT

PAGE 03

3

- 17 • G. New and adverse Transportation/Environmental/Economic impacts to City residents and businesses forced to travel greater distances (outside the city) – to conduct business with car repair, home remodeling, service businesses, who would be forced out under all but the NO ACTION alternative.
- 18 • H. Financial liability that the City may have to existing businesses who would be forced to relocate or close.
- 19 • I. Cumulative Economic impact of homogenizing commercial land-uses in the City. In other words, ADD discussion of the economic impacts of losing this unique mix of businesses. (Bellevue's Light Industrial Zone, Manufacturing and lower-cost warehouse/retail parks all serve a huge geographical area. Not only does this area provide essential and diverse commercial businesses, it is virtually the only centralized area in East King County where rents are affordable for incubator, mom-and-pop, and start-up businesses.) Add in discussion on how City plans on keeping these businesses, and at what financial cost?
- 20 • J. ADD discussion about precedent for rezoning without "economic need". In other words, government involvement in "redevelopment" outside CBDs has historically centered on imminent domain cases, when a compelling governmental/state's interest exists. *No such compelling interest exists in this case.*
- 21 • K. ADD chart, and discussion on economic viability of existing business in the Bel-Red area. Add in discussion about why existing businesses are locating /staying in the Bel-Red corridor. *Market forces should guide economic growth – not the hubris of governmental agencies or pressure from commercial land developers.*

22 Clearly, this cursory Economic "discussion" doesn't cover economic impacts at all! One could easily conclude that the reason no evidence to support these sweeping land-use changes is presented – is simply because no evidence exists. Certainly the Bel Red business and property owners that testified at the DEIS hearing February 15, 2007, were adamantly against these sweeping changes to the Bel-Red commercial area. *They seemed to be all saying the same thing: "Leave it like it is, and let us continue to do business in the LI/commercial zone" "If it aint broke, don't fix it."*

3. TRANSPORTATION (Chapter 10)

23 The major factor driving this entire process isn't the need to change the Land Uses in the area, but rather the City's desire to influence if/where Sound Transit locates east of the CBD. But even if voters approve extension of Light Rail east to Redmond, (and that is a huge IF), the exact (proposed) locations will not be known until well after this process is complete. Given these uncertainties, and numerous factors outside the City's control, it seems premature to place so many assumptions in this document on a new transit corridor – to be built where no road currently even exists (proposed NE 16th Street).

At best, the decision to predicate much of this DEIS's Transportation discussion on the assumption that Light Rail will be located along this non-existing ROW violates a basic tenant of Planning: that "LAND USE DRIVES TRANSPORTATION".

24 In this case, City staff have turned what they learned in Urban Planning school upside down, so that now – transportation will drive land-use. In effect, this transportation impact discussion requires us to make a huge and expensive leap of faith: *We're sure that we can get LIGHT RAIL along NE 16th, Oh, by the way – to justify that, we'll need to require 1000s of new housing units and mixed-used development into Bel Red. Not only that, this new mini-CBD*

Heidi Benz-Merritt-10

Comment noted. See responses to Heidi Benz-Merritt-10 through -21.

Heidi Benz-Merritt-11

See response to Bellevue Chamber of Commerce-2 and -13. Analysis of the industry sectors in the Bel-Red Corridor – and the associated number of businesses and employees – was conducted by staff and considered by the Bel-Red Steering Committee. This included manufacturing and light industrial businesses. For example, see materials prepared for the Bel-Red Steering Committee Meeting on March 2, 2006. An analysis of payroll and projected tax revenue from these businesses was not undertaken as part of the Bel-Red Corridor planning process. The Preliminary Preferred Alternative assumes a higher level of future employment growth than is assumed in the No-Action Alternative.

Heidi Benz-Merritt-12

See response to Heidi Benz-Merritt-11

Heidi Benz-Merritt-13

See response to Heidi Benz-Merritt-11

Heidi Benz-Merritt-14

See response to Heidi Benz-Merritt-11. The FEIS does not include an analysis of hypothetical business relocations.

Heidi Benz-Merritt-15

See response to Bridle Trails Community Club-2 and -3, and Heidi Benz-Merritt-11. The DEIS considered potential indirect economic impacts. These were addressed qualitatively. The City did not survey every manufacturing/ warehouse-dependent business in the Bel-Red Corridor.

Comments

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MERRITT

PAGE 04

4

will complete with our current Downtown in both housing, office and retail. Oh, we almost forgot – you all will get to pay for it! And it will be pricey.....

With expected Light Rail projects delays and cost over runs, building a fix-rail project that is cost-effective is critical. Transportation analysis should include the following:

- A. Cost analysis of ROW acquisition for NE 16th corridor.
- B. Cost comparison figures for Light Rail along NE 16th to Redmond - compared to Light rail along SR 520, NE 8th, or Bel Red Road .
- C. Travel times expected for Light Rail users traveling between Microsoft/points east and downtown Bellevue/Seattle with the 4 alignments in B. above.
- D. Comparison of Travel times in C. with bus and SOV travel times for all 4 alignments.
- E. Analysis of traffic impacts and mode splits (SOV, HOV, Bus, Rail) for all 4 potential Rail alignments in B.
- F. Ridership projections on all nodes with cost per trip data on all 4 potential Rail alignments in B.

With the potential for several million additional square feet of office/retail and housing proposed in this DEIS, there is no meaningful data on traffic impacts to the surrounding neighborhoods.

- G. ADD in traffic data, comparing Level of Service data for NON-SIGNALIZED intersections, which is measured as the amount of (waiting) time it takes to go through a stop-sign controlled intersection (i.e. NE 24th at 134th). Current traffic data only looks at **signalized** intersections, and traffic volumes on streets – not the length of time it takes for us to enter/exit our neighborhoods. This analysis should be done for all surrounding neighborhood streets, including: NE 24th at 130th and 134th, and NE 132nd and NE 134th at NE 8th Street.
- H. Even though a current study of the North-South BN Rail ROW is underway, this should not be used as a rationale for not including substantive discussion on this potentially important and cost-effective Light-Rail line corridor. Its numerous advantages as a cost-effective corridor, and its potential for reducing PM Peak back-up congestion onto SR 520 should be discussed.

Although I have limited my comments to just the areas of Economic, Housing and Transportation, neighborhood impacts -particularly environmental impacts (traffic, noise, economic, aesthetic/view loss,) would be detrimental, and are non-mitigating. The NO ACTION alternative should be adopted by Bellevue City Council.

Thank you for this opportunity to comment, and please add my name as a Party of Record, and to your electronic and regular mail distribution list.

However, the City provided ample opportunities as part of the public involvement process for businesses to communicate to the City how they believe the alternatives would affect them. These included widely publicized business and property owner panels as well as other opportunities. Chapter 1 and Appendix B in the FEIS provides a summary of the public involvement opportunities.

Heidi Benz-Merritt-16

See responses to Heidi Benz-Merritt-11 and -15.

Heidi Benz-Merritt-17

See response to Bridle Trails Community Club-8.

Heidi Benz-Merritt-18

Comment noted. As described in Chapter 2, the project steering committee's recommendation in the Preliminary Preferred Alternative is to protect existing businesses in the corridor.

Heidi Benz-Merritt-19

See responses to Heidi Benz-Merritt-11 through 17. Regarding mitigation measures, see response to Bellevue Chamber of ommerce-2. An analysis of the cost to the City of potential efforts to retain small start-up businesses was outside the scope of work for the EIS.

Heidi Benz-Merritt-20

See response to David Plummer-80a.

Heidi Benz-Merritt-21

Comment noted. An important component of the study was to understand economic and market forces in the corridor, which led to a market economic analysis by Leland Consulting Group (included in Appendix B of the DEIS). As noted, the study was based on a number of data sources and stakeholder interviews (see responses to David Plummer-34a and -62a).

Comments**Responses****Heidi Benz-Merritt-22**

Comment noted. See responses to Coca-Cola Bottling-7a, Stacie LeBlanc- 1, and David Plummer-25a.

Heidi Benz-Merritt-23

See response to Stacie LeBlanc- 1.

Heidi Benz-Merritt-24

In the Bel-Red Corridor, a potential future light-rail transit (LRT) alignment and stations may provide a component of transportation system infrastructure that enables higher intensity land use in the development nodes. Refer to City Council Planning Bel-Red Corridor Principle 6, Land Use/Transportation Integration.

Heidi Benz-Merritt-25

See response to Sound Transit-2a. With LRT being a potential new mode of transportation through the Bel-Red Corridor and the uncertainty of many aspects of the LRT, the City understands how LRT can suddenly become a focal point of the Bel-Red Corridor study. However, it is important to understand that the Bel-Red Corridor DEIS documents impacts that would be created by the action described on page XVII of the DEIS. This action pertains to the adoption of new land uses and identification of transportation improvements needed to support the land use changes. Included in all alternatives are many regional projects, one of which is the East Link LRT line. Each individual transportation project that is identified will be required to go through an environmental documentation process, when it moves forward for design and construction. Sound Transit is currently preparing the EIS for the East Link project, in which it will document many of the issues raised. Because the Bel-Red Corridor DEIS does not list LRT as a part of its proposed action, an alternatives analysis documenting cost, ridership, travel times, and mode splits is not required for various alignment alternatives. Rather, the Bel-Red Corridor DEIS

Comments**Responses**

assumed one LRT alignment, similar to other regional transportation improvements, in which only one alternative was assumed (I-405, SR 520, and I-90). Regarding right-of-way acquisition for NE 16th Street, detailed cost estimates will be developed during later phases of this corridor study, as well as during the design and environmental documentation of this specific project.

Heidi Benz-Merritt-26

For a nonproject, programmatic DEIS, it is always difficult deciding how much detail and analysis to provide. In fact, many of the comments received to this DEIS have suggested that too much detail has been provided, while other comments often request more data and analysis. In an effort to limit the number of intersections analyzed for this programmatic EIS, study intersections were those identified by the City of Bellevue as concurrency intersections and/or future intersections created by transportation improvements needed to support the project action. As a result, no unsignalized intersections were included in the analysis. However, one of the four intersections listed in your comment (NE 24th St at 130th Avenue NE) has been included with 10 other additional intersections to be analyzed for the Preliminary Preferred Alternative in the FEIS. These 11 intersections are in addition to the 47 intersections analyzed in the DEIS.

The use of the Burlington Northern Santa Fe (BNSF) railway for LRT is an option that has been analyzed by Sound Transit and will be documented in the East Link EIS.

Heidi Benz-Merritt-27

Regional discussions of the potential conversion of the BNSF rail right-of-way to a multipurpose trail are ongoing separate from the Bel-Red Corridor Project. The Bel-Red Corridor EIS assumes a nonmotorized transportation corridor in the future and is planning accordingly. Such an assumption does not preclude the future use of the corridor for commuter rail transportation.

Comments



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March 8, 2007

RECEIVED
MAR 9 2007
Development Services

Ms. Carol Helland
Bellevue Department of Planning & Community Development
PO Box 90012
Bellevue, WA 98009-9012

Dear Ms. Helland:

We are writing to make comment on the Environmental Impact Statement (EIS) for the Bel-Red corridor.

The EIS addresses four alternatives for growth in the corridor. All of the alternatives, except for the no action alternative, propose growth in housing development at different levels in the corridor. Regardless of the alternative chosen, it is our opinion that there needs to be a requirement that any new housing development in the corridor have a minimum 10% affordable housing requirement. Affordable housing applies to those individuals and families that make less than the area median income.

The need for affordable and workforce housing in Bellevue is significant and the failure to provide affordable housing, as outlined in the 2006 Bellevue Comprehensive Plan, will have an environmental impact on traffic and quality of life, as well as ability to sustain workforce housing in Bellevue, and most significantly, leaves no accountability for the stated goals you've outlined in your comprehensive plan, and neglects the needs of some of the most vulnerable citizens of Bellevue.

According to the 2006 Bellevue comprehensive plan:

A major challenge for Bellevue and for other Eastside cities is to provide affordable housing opportunities for all economic segments of the population...According to Bellevue residents, affordable housing is an on-going issue.... Lack of affordable housing regularly ranks very high as a community problem in the city's biennial Human Services Needs public surveys... As of 2004, it is estimated that a three person household earning 100 percent of median income could afford to buy a typical home in only one out of nine Bellevue neighborhoods.

The lack of affordable and workforce housing, coupled with increases in service related jobs in the downtown core, means that a large portion of Bellevue service

Responses

St. Andrews Housing Group-1

A major challenge for Bellevue and other Eastside cities is the ability to provide affordable housing for all economic segments of the population. While no one area of the city will solve Bellevue's affordable housing challenges, the Bel-Red corridor provides a major opportunity to supplement the citywide supply of affordable/workforce housing. In an area that currently has very limited housing potential based on existing zoning, the Preliminary Preferred Alternative's development program for Bel-Red includes the potential for 5,000 new housing units in vibrant, diverse neighborhoods. Part of the Bel-Red Steering Committee's vision for these neighborhoods, tentatively adopted on June 13, 2007, is that they "will contain a variety of housing types to meet the needs of a diverse population of varied income levels."

Providing a range of housing choices requires a multi-faceted approach. A Regional Coalition for Housing (ARCH) has worked aggressively and collaboratively since 1992 to increase the supply of affordable housing on the Eastside and in Bellevue. Bellevue has been a major financial contributor to ARCH since its inception. Currently, the city has a voluntary (though not often used) citywide density bonus provision and allows transportation impact fee waiver for affordable units. Also, smaller senior units, although not tied to affordability, currently count as half a unit for purposes of density calculation.

Some of the options that the city could consider on a citywide basis or for the Bel-Red corridor include:

- Developing new incentives for density, height and other development standards for affordable/workforce housing.
- Use of the state's multifamily property tax abatement provisions (tied to providing affordable/workforce housing).

Comments

sector employees must commute. This includes teachers, childcare workers, bookkeepers, retail workers, bus drivers, administrative support staff, restaurant and salon workers whose salaries do not approach income levels needed to live anywhere in Bellevue. If Bellevue does not have public land use policies that create nearby housing opportunities for Bellevue's workforce, a significant environmental impact will occur as new traffic is added to already maximized transportation corridors.

2 The lack of affordable workforce housing in Bellevue has contributed to increases in traffic pressures on our major highways, the floating bridges and traffic in the downtown core. Planned future downtown development will worsen this problem. The creation of an affordable housing requirement for the development of the Bel-Red corridor will provide the only opportunity Bellevue has to establish nearby workforce housing for the downtown core and to help mitigate traffic congestion. Implementing an affordable housing requirement will also be essential to achieving goals within the comprehensive plan. According to the plan, the City has the following affordable housing goal:

To aggressively pursue opportunities to preserve and develop housing throughout the city and the Eastside to meet the needs of all economic segments of the community

and the following policy:

POLICY HO-25. Ensure that affordable housing opportunities are not concentrated, but rather are dispersed throughout the city.

3 We strongly urge that a minimum affordable housing threshold of 10% be established as a requirement to any new housing development in the Bel-Red corridor, both in order to mitigate the environmental impact related to traffic and to assure compliance with comprehensive plan goals and policy. Bellevue is emerging as a clear leader in our region for development, for quality of downtown living, for a retail core to rival the best in other major cities. How you incorporate affordable housing requirements in the Bel-Red corridor provides a tremendous opportunity for you to also step up to a regional leadership role in meeting this most fundamental and basic community need.

Responses

- Use of surplus properties for affordable/workforce housing. Remnant sites may be available through infrastructure development in the Bel-Red corridor.
- Explore linking the upzoning of property to a provision that a percent of new units are affordable.
- Seek new or enhanced partnerships with non-profits or employers for developing affordable/workforce housing.

Following the Bel-Red Steering Committee process, the Bellevue City Council and Planning Commission will carefully consider appropriate implementation tools that will guide redevelopment of the Bel-Red corridor, consistent with the new vision. This will occur in Fall 2007 through Spring 2008. How to meet the needs of a "diverse population of varied income levels" is among the issues to be considered in this implementation process.

St. Andrews Housing Group-2

See response to St. Andrews Housing Group-1.

St. Andrews Housing Group-3

See response to St. Andrews Housing Group-1.

Comments

Responses

Sincerely,



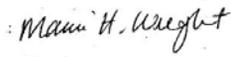
ST. ANDREW'S HOUSING GROUP
Mike Nielsen
Executive Director

St. Andrew's Housing Group Board

Paul Dressel, Board President



Marni Wright, Board Vice President



Jim Long, Board Secretary



Jason Anderson, Board Treasurer



Linda Bergam, Board Member



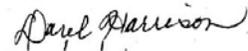
Clare Moe, Board Member



Eric Campbell, Board Member



Darel Harrison, Board Member



Hal Ferris, Board Member



Mary Lorna Meade, Board Member



Patricia Parsons, Board Member



Comments

Responses

Tom Strain, Board Member
Lainey Alai-Malo, Board Member


Lainey C. Alai-Malo

Comments

JAMES I. KIMBROUGH
 12224 N.E. 8th Street, Apt. 303
 Bellevue, WA 98005
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 jamkimbr@msn.com

RECEIVED
 MAR 8 2007
 Development Services

March 7, 2007

Carol Helland
 Bellevue Department of Planning and Community Development
 P.O. Box 90012
 Bellevue, WA 98009-9012

Re: Bel-Red Corridor Study

Dear Ms. Helland,

I have been unable to find anything in the planning for this revision of the Comprehensive Plan that addresses affordable housing, a problem that plagues every urban center in the nation.

This is an opportunity that very few communities ever get, to replan an area as large and central as the Bel-Red Corridor. It would be a real shame not to take some forward thinking steps in providing housing opportunities for those families who serve such vital functions in our society.

The economics of building affordable housing is always a challenge. The action of the city as expressed in planning and zoning has an enormous impact on those costs. I urge you to be sensitive to this need and make some provisions to enhance that part of the market.

Sincerely,


Responses**James Kimbrough-1**

A major challenge for Bellevue and other Eastside cities is the ability to provide affordable housing for all economic segments of the population. While no one area of the city will solve Bellevue's affordable housing challenges, the Bel-Red corridor provides a major opportunity to supplement the citywide supply of affordable/workforce housing. In an area that currently has very limited housing potential based on existing zoning, the Preliminary Preferred Alternative's development program for Bel-Red includes the potential for 5,000 new housing units in vibrant, diverse neighborhoods. Part of the Bel-Red Steering Committee's vision for these neighborhoods, tentatively adopted on June 13, 2007, is that they "will contain a variety of housing types to meet the needs of a diverse population of varied income levels."

Providing a range of housing choices requires a multi-faceted approach. A Regional Coalition for Housing (ARCH) has worked aggressively and collaboratively since 1992 to increase the supply of affordable housing on the Eastside and in Bellevue. Bellevue has been a major financial contributor to ARCH since its inception. Currently, the city has a voluntary (though not often used) citywide density bonus provision and allows transportation impact fee waiver for affordable units. Also, smaller senior units, although not tied to affordability, currently count as half a unit for purposes of density calculation.

Some of the options that the city could consider on a citywide basis or for the Bel-Red corridor include:

- Developing new incentives for density, height and other development standards for affordable/workforce housing.
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Comments**Responses**

- Use of surplus properties for affordable/workforce housing. Remnant sites may be available through infrastructure development in the Bel-Red corridor.
- Explore linking the upzoning of property to a provision that a percent of new units are affordable.
- Seek new or enhanced partnerships with non-profits or employers for developing affordable/workforce housing.

Following the Bel-Red Steering Committee process, the Bellevue City Council and Planning Commission will carefully consider appropriate implementation tools that will guide redevelopment of the Bel-Red corridor, consistent with the new vision. This will occur in Fall 2007 through Spring 2008. How to meet the needs of a “diverse population of varied income levels” is among the issues to be considered in this implementation process.

Comments

Responses

March 7, 2007

Page 1 of 1

McDonald, Kevin

From: Paul Burckhard [paulb@loziergroup.com]
Sent: Wednesday, March 07, 2007 10:39 AM
To: BelRed
Subject: Bel-Red Corridor Comments

March 7, 2007

Comments on Bel-Red Corridor Draft EIS

From: Paul Burckhard
 13252 NE 47th St
 Bellevue, WA 98005

After studying the draft EIS I would favor the NO ACTION alternative for the following reasons.

1 The Bel-Red Corridor is a unique mix of small businesses, light industrial, retail and office uses providing needed services for the residents of Bellevue that cannot be found in other parts of the city. I am concerned that implementation of alternatives 1, 2 or 3 and the resulting zoning changes would eventually force many of these businesses out of this area as there is no other land within the city for them to locate, and even if there was, the cost to do so would be prohibitive. This would result in Bellevue's residents having to drive to outlying areas-Woodinville, Renton, Issaquah or Seattle-to find the business and services currently provided in this corridor and the loss of many small family owned businesses.

2 The changes proposed in the 3 alternatives seem to be driven by the assumption that a light rail or transit corridor will some day be located in this area. I would question the reasoning behind running a future transit line through the middle of the Bel-Red Corridor rather than following an existing ROW such as Bel-Red Road or NE 20th St, potentially disrupting fewer existing businesses. If the transit corridor is developed as shown in the proposed alternatives, with higher density residential development occurring along it's route, this will surly result in the demise of many of the existing businesses in the area as they would not be deemed compatible with residential development.

3 Certain changes in the 3 alternatives make sense such as the expansion of medical offices along the north 116th Ave corridor and additional office parks in the area of Safeway and along Bel-Red road if and when these properties become available for redevelopment, but these changes can be accommodated within the existing zoning or with minor changes to the current zoning.

4 The other concern that I have as a resident of the surrounding community is the impact of increased traffic that would result from implementing any of the 3 alternatives. To date, the city's efforts at reducing cut through traffic in the neighborhoods to the north of this corridor have not had much impact and bringing additional residents into this area will only increase traffic in these neighborhoods.

Certainly a lot more study on the real impacts of these proposals on the existing business and surrounding residents needs to be done before any changes are implemented.

Paul Burckhard-1

See response to Bridle Trails Community Club- 8.

Paul Burckhard-2

Sound Transit and the City have evaluated potential light-rail transit (LRT) routes through the middle of the corridor (NE 16th Street) and along the fringes in existing right-of-way (along both SR 520 and Bel-Red Road). Sound Transit is continuing to evaluate an LRT alignment along SR 520 in its environmental analysis; at this point, this alternative contains no stations in the Bel-Red Corridor. Sound Transit considered an LRT alignment along Bel-Red Road, but this alignment was removed from further considerations; the City was concerned about how this alignment would affect traffic operations on Bel-Red Road and also impact adjoining residential neighborhoods to the south. The NE 16th Street alignment offers opportunities to serve the core of the area and provide the least impact to adjoining residential neighborhoods—in accordance to City Council Bel-Red Corridor Planning Principle 8. Impacts to existing businesses, both due to right-of-way and future redevelopment, is a major concern and would need to be addressed through future planning and implementation.

One of the City Council's planning principles that has helped to guide this process expresses the intent to take advantage of potential future light rail through the Bel-Red Corridor (Planning Principle 5). An LRT alignment along Bel-Red Road may follow an existing public right-of-way, but that right-of-way is already fully occupied by the street and sidewalk. So additional right-of-way would have to be acquired for the LRT guideway and stations. Further, in order to fully take advantage of LRT stations, higher density, mixed-use development should be developed within ¼ mile of the station. An alignment with station(s) along Bel-Red

Comments**Responses**

Road would not afford the redevelopment opportunity that an alignment through the center of the corridor because the existing small office and low-density residential development south of Bel-Red Road is outside of the study area and is not considered as being available for redevelopment. Significant redevelopment could occur only north of Bel-Red Road and, therefore, only half of the development potential afforded by a station would be achieved.

Paul Burckhard-3

Comment noted.

Paul Burckhard-4

See response to Bridle Trails Community Club-12.

Comments**Responses**

Page 1 of 2

Please see the responses to Renay Bennett 1-7.

O'Neill, Kevin

From: Renay Bennett [renaybennett@msn.com]
Sent: Wednesday, March 07, 2007 5:39 PM
To: BelRed@bellevuewa.gov
Cc: Helland, Carol
Subject: DUE March 12 - Bel Red DEIs comments

http://www.bellevuewa.gov/pdf/Transportation/Ch11_PublicServicesandUtilities.pdf

Subject: DEIS for Bel-Red Corridor Study comments

This DEIS is wholly insufficient and fatally flawed in its analysis with regard to increased needs of future housing and commercial development and their impacts in and around the Bel-Red corridor and the city as a whole. It is concerning that this analysis exhibits so little care for the public safety.

Electrical Power.

The DEIS fails to identify what planned facilities may need to be built to accommodate future increased development and rezoning, only hazily mentioning the need for it, if needed. The locale of such a transmission switching stations and distribution substation, along with their associated transmission lines and distribution circuits is stated to be somewhere near 520, between 135th and 140th. This could be in or near residential areas, which would be not be able to be mitigated and would probably be heavily opposed by residents.

Water.

The DEIS fails to address increased water usage that will result from the proposed increases in development in the Bel-Red corridor. The system that is there is insufficient to provide water to any real level of increased residential or commercial development. Though there is a scheme via the Cascade Water Alliance, this group will not be able to provide clean drinking water to these new developments as the Cascade Water Alliance is trying to use human use and commercially contaminated water as drinking water. This will never pass muster with officials charged with public safety and those concerned with water quality and its effects on humans and animal life, including aquatic life. As a member of the Downtown Implementation Plan, I specifically asked for plans to provide clean water for the new development in the downtown. No such action was taken.

Fire Protection and Emergency Medical Services.

The analysis of future needs for fire service is fatally flawed. The proposals for increase in development would necessitate a new fire station. One need only look how this need is most evident in a redevelopment and upzone scenario as is occurring in the Bellevue downtown. Significant growth in the form of high rises is occurring without the fire support that is needed to address the special requirements needed to continue Bellevue's tradition of 6 minute response time. This is dangerous to the residents of Bellevue. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for

Comments**Responses**

Page 2 of 2

this purpose. No such action was taken.

4 With increased multi-family development and commercial development comes crime, as evidenced in the Bellevue downtown. No planned new additions of police personnel to keep residents and properties safe from criminals shows a fatally flawed approach to this analysis, as well as disdain for residents and property owners safety.

5 Schools.

This analysis is fatally flawed. As has been evidenced in the Bellevue downtown, new families moving in are putting tremendous pressure on our local schools. No property is planned for schools in this area, yet massive multi-family development is planned - and these folks will definitely have children. The analysis states that "District enrollments are based on past actual enrollment and do not routinely factor in new housing units, except as children of new residents are enrolled. There are no schools located in the Bel-Red Corridor study area." This is proof of the un-intelligent mis-reasoning that is evidenced throughout this analysis. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

I have limited my comments to the issues above, however, there are many more instances of fatally flawed analysis. It is a shame that this is costing the taxpayers of Bellevue so much - and who will receive no benefit. The No-Action alternative must be chosen. The residents and taxpayers of this city deserve to be protected from the encroachment and unmitigated impacts that will occur with the other alternatives - and the only way to do this is for the council to choose the No-Action alternative.

Respectfully submitted,
Renay Bennett

Comments

Responses

WESTEC,
LTD.

10900 N.E. 8th Street (425) 462-5780
Suite 900 (425) 462-5781 Fax
Bellevue, WA 98008

RECEIVED
MAR 8 2007
Development Services

March 6, 2007

Carol Helland, Environmental Coordinator
City of Bellevue Department of Planning & Community Development
PO Box 90012
Bellevue, WA 98009-9012

RE: Comments on DEIS for the Bel-Red Corridor Project

Dear Carol:

This letter represents comments from the ownership of two properties within the study area as follows which are owned by various McNae family members:

1. Sherwood Shopping Center anchored by Trader Joe's, 15400 NE 20th.
2. McDonald's located at 13841 NE 20th.

We have reviewed the DEIS for the Bel-Red Corridor Project. We support Alternative 3 as we believe it would provide the highest and best use for the study area going forward. We support the concept of a mixed use zoning for the area that includes the Sherwood Shopping Center, provided that such zoning is an elective overlay that permits the existing underlying zoning for continued use and future redevelopment.

In reviewing the DEIS we note that there are a number of road improvements called for including street widening, turn lanes and the addition of bicycle paths and lanes. Some of these improvements are indicated in Figure 2-2. We would appreciate additional clarification, information and involvement so that we can fully understand how these improvements would affect access and use of the above referenced properties. In the case of Sherwood Center it is vital that access points to the property remain and not be hindered to retain a successful neighborhood shopping center serving the local community. The major tenants to the property require the existing access and in some cases have the option to terminate their lease and leave the shopping center if the existing access is eliminated or reduced. Therefore on traffic matters, we ask that for our properties that we be engaged directly prior to the development of final traffic revisions.

Sincerely,



Don Pickens
President
Agent for Sherwood Shopping Center and McDonald's

WESTEC, LTD-1

See response to Bridle Trails Community Club-8. The Preliminary Preferred Alternative includes a land use vision for this area similar to that contained in Alternative 3.

WESTEC, LTD-2

Potential transportation system improvements for the Preliminary Preferred Alternative are refined from those analyzed in the DEIS. Much of the transportation infrastructure would be developed in the western portion of the Bel-Red Corridor study area, but some intersection improvements would be built where spot capacity improvements are needed. The City would inform and involve nearby property owners during the planning, design, environmental review, and construction of transportation system improvements.

Comments

BILLY-JOE PARK, LLC
 P.O. Box 261
 Medina, WA 98039
 (425) 454-3775
 Fax: (425) 454-3794

March 1, 2007

Bel-Red Corridor Steering Committee
 P.O. Box 90012
 Bellevue, WA 98009

Hand Delivered**RE: 1000 124TH AVENUE N.E.**

Dear Committee Members:

We own an office building located at the above address, which is the southeast corner of Bel-Red Road and 124th Avenue N.E. Because we have owned this property for approximately eight (8) years, we have suffered through the problems created by the lack of appropriate zoning along Bel-Red over the years, which has been a neglected but important part of the City of Bellevue. We have been anxiously awaiting the long-anticipated re-zoning of this corridor. Accordingly, we both applaud and support your considerable efforts to make sense of the land use along this important corridor.

However, we take serious exception to the study's almost exclusive focus on the north side of Bel-Red, to such an extent that it is a misnomer to characterize it as a study of the *corridor*. We specifically object to the characterization of our property as being suitable for low density office or housing/office as part of a transition area in the three alternative plans under consideration.

Although certain properties along the south side of Bel-Red may, due to their configuration and uses of adjacent properties, be appropriate for transition zone restrictions, a cursory review of our property indicates that it should be treated differently. Unlike most properties, a public street (N.E. 10th Place) is located along our southerly boundary. In addition, the existing uses to the south are either high-density multifamily or office. As a result of these somewhat unique factors, our property – which has the potential for completing an important intersection along the corridor – should not be subject to the limitations or development proposed by the development plans currently under consideration.

We urge you to re-evaluate the intensity of development proposed for our property, as well as the Sternoffs' adjacent property to the east. Especially because we have anxiously awaited the re-zoning of our property over the years, you can be assured that we will vigorously oppose any development proposal which arbitrarily and unnecessarily restricts our ability to re-develop this critical property.

Responses**Billy-Joe Park, LLC-1**

To provide a transition to the lower density residential areas to the south, the Steering Committee directed that a new housing component be added to the Preliminary Preferred Alternative for the land south of Bel-Red Road, which is developed with office uses, and to retain the development intensity allowed under the existing zoning. This future land use scenario was analyzed in the DEIS under Alternative 3, and is consistent with Bel-Red Corridor Planning Principle 8.

Billy-Joe Park, LLC-2

A varying-width band of office and housing south of Bel-Red Road is intended to create an effective transition between the more intense land uses proposed to the north of Bel-Red Road and the existing residential areas to the south of the study area. This band generally corresponds to the existing Office zoning. The envisioned transition is created when all of the parcels within this geographic area are developed with similar character and intensity. The Steering Committee determined that the addition of housing to the office development, while retaining the planned land use intensity, would be consistent with the function of this area to serve as a transition.

Billy-Joe Park, LLC-3

See response to Billy-Joe Park, LLC-2.

Comments

Responses

Bel-Red Corridor Steering Committee
March 1, 2007
Page 2 of 2

Please contact me if you wish to discuss this further.

Sincerely yours,



William C. Summers

cc: Bob Sternoff
Kevin O'Neill
Kevin McDonald

Comments

Responses

Page 1 of 1

O'Neill, Kevin

From: JGFerrell@aol.com
Sent: Tuesday, February 27, 2007 3:08 PM
To: BelRed
Subject: BelRed corridor zoning

1 As 40 year resident of East Bellevue, I wish to add my comment on the zoning option preferred for the BelRed corridor. My choice echoes the request from many residents of Bridle Trails community, preferring "No action alternative because "the current light industrial zoning in the corridor is the most conducive use with the neighborhood". I use a lot of these businesses and don't want to have to drive long ways to find similar ones.

Submitted by: Clara Ferrell
16204 NE 6th St
Bellevue, WA 98008-4332

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Clara Ferrell-1

See response to Bridle Trails Community Club- 8. The Preliminary Preferred Alternative provides for the opportunity for existing businesses to remain in place and to expand if desired.

Comments

Responses

Page 1 of 1

O'Neill, Kevin

From: Lesdoc@aol.com
Sent: Monday, February 26, 2007 12:56 PM
To: BelRed
Subject: Bel-Red Corridor Project

1 We live in the area affected and feel the "no action" alternative is the best use. The businesses in the area serve us well and should not be squeezed out by higher density and the accompanying higher taxes.

2 The traffic in the area is just manageable now. The changes suggested in the alternatives would create over crowding the area streets, becoming to much like downtown.

Again, we request no action alternative for the Bel-Red Project.

Lucille H Harms
G. Lester Harms
14468 NE 12th Pl.
Bellevue

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Lucille H. Harms-1

See response to Clara Ferrell-1.

Lucille H. Harms-2

See response to Peter Mears-11. Significant improvements to the transportation system – pedestrian/bicycle facilities, roadways, and light rail – are planned to accompany land use changes in order to accommodate expected increases in traffic.

Comments

Responses

26 February 2007

COUNCIL
 RD PLANNING
 TRANSIT PLANNING &
 cc: CMO
 CCO

City Council
 City of Bellevue
 Bellevue, Washington

RECEIVED
 FEB 26 2007
 CITY COUNCIL

Subject: Bel-Red Corridor Project

Dear Council Members;

At your 20 February 2007 study session, staff members and a member of the Bel-Red Corridor steering committee provided a brief update on the Project, and the recently-released draft environmental impact statement (DEIS) for the Project. I was disappointed, but not surprised, that the City's environmental coordinator was not invited to give you a summary of the comments from the public hearing on the DEIS. It was equally disappointing that none of you thought to ask for such a summary; but, in the best traditions of citizen civic responsibility, I will attempt to remedy that deficiency by forwarding via email a summary from my own notes of the comments made to the hearing officer.

There are a number of fundamental problems with this very expensive and unnecessary project and its recently released DEIS:

1. The so-called 'market analysis' done by one of the City's consultants (Leland Consulting Group) was published first on 25 October 2005, and re-released with a few minor changes in March 2006. Leland's reports are, for the most part, a collection of materials that are not specifically related to the Bel-Red Corridor area, are poorly documented with references, and poorly rationalized. For example, the projected retail floor area "demand" is derived from a tabulation (Table 7) of PSRC population forecasts for 8 FAZs (forecast analysis zones), only two of which are directly applicable to the Corridor. (The report states that the 8 zones encompass an area with a 3-mile radius centered at approximately the Bel-Red Road and 130th NE, with the Bel-Red corridor expected to capture 25-33% of the total retail demand in the 8-zone area.) Whether such a large area (28 square miles), and Leland's simplistic demand calculation is a useful basis to forecast retail floor area in the Corridor is certainly doubtful. There are many forecasting models that can be used for such an analysis; see some examples in the attachment.

Leland's report also represents that "improvement ratios" can be used to rationalize the need to rezone an area to more intense use (see page 6 of the March 2006 report). The report states that a ratio of 75% or higher confirms that a property is being used at its "highest and best use." The report offers no justification for this assertion, and even a modest literature search cannot confirm such a wild and wooly claim. Improvement ratios for properties in the Bel-Red Corridor vary quite significantly, depending on the property, and as a function of time: see the attached figure and table.

2. The DEIS does not disclose the potential costs associated with the very extensive transportation and utility infrastructure, and public amenities (parks, open space, etc.) required for the Action Alternatives.

David Plummer-1b

Comment noted. See responses to David Plummer-34a and -62a.

David Plummer-2b

Comment noted.

David Plummer-3b

See response to Kemper Development-18.

Comments

Responses

4 3. The DEIS does not adequately or accurately describe the likely development of the Corridor under the No-Action alternative because it fails to account for the wide variety of permitted uses in the Corridor under the existing Bel-Red/Northrup sub-area plan and zoning, and any likely changes that property owners might propose if the Project alternatives do not occur.

5 4. The DEIS should clarify its characterization of Sound Transit's plan to deploy light rail transit as part of the East Link Project, especially to note that one route to be examined in Sound Transit's East Link EIS is along SR520. The DEIS also needs to revise its LRT station locations to coincide with the station locations shown by Sound Transit's documentation for the East Link Project.

6 5. The DEIS does not explain the rationale or objectives for the proposal, especially with reference to the City's Buildable Lands Report, and presentations made to the Bellevue Planning Commission in September 2004. The City's Buildable Lands Report and subsequent staff analyses concluded that there was no need to change the City's Comprehensive Plan or rezone additional properties to higher densities or intensities to accommodate the City's 20-year growth targets.

7 6. The City Council and the City's comprehensive plan have long espoused the theme that future employment and residential growth will be concentrated in the Downtown Subarea. As proposed under DEIS alternatives 1, 2, and 3, 2.5-4.5 million square feet of commercial development, 4700-9200 new employees, 3500-5000 residential units, and a population of 6300-8700 would create a wholly separated and isolated business and residential center. In spite of the expansive, unsupported rationale in the DEIS, these 3 alternatives would constitute creation of small-scale city within Bellevue and are in *direct conflict* with the City's commitment to concentrate growth in the Downtown Subarea.

8 7. WAC 197-11-060(3)(iii) and WAC 197-11-442(4) state that nonproject proposals should be described in terms of *objectives*, rather than preferred solutions; and discussion of alternatives for a comprehensive plan EIS's for nonproject proposals shall be limited to a general discussion of the impacts of the proposal. The published DEIS goes far beyond these requirements, and provides excessive and unsupported detailed rationale and data based on unsupported, or very limited studies performed by City consultants.

The DEIS does not define or rationalize any specific *objectives* for the Bel-Red project; rather, there are a set of broad, but ill-defined "goals" established by the Bellevue City Council that were not subjected to any public review or input. The DEIS should be revised to identify the specific objectives of the proposal.

9 Although not required by the WAC, the DEIS should be revised to include a reasonable life cycle cost estimate for the construction, operation and maintenance of the various transportation and other supporting public infrastructure that would be required for the no-action alternative and each action alternative.

10 8. The DEIS vastly overstates the extent of public and business/property-owner participation in the development of the three action alternatives, and for the project as a whole. There was very limited input from a broad range of Bellevue citizens, and only limited input from very few business/property owners. In addition, neither the City nor the Project Steering

David Plummer-4b

See responses to David Plummer-12a through 15a.

David Plummer-5b

See response to Sound Transit- 2a and David Plummer-87a.

David Plummer-6b

See response to David Plummer-18a.

David Plummer-7b

See responses to Bellevue Downtown Association-6, Heidi Benz-Merritt-7, and Heidi Benz-Merritt-26. Additionally, the project planning principles and objectives do not envision that the Bel-Red Corridor will become a separated and isolated business and residential center. To the contrary, Bel-Red Corridor Planning Principle 2 calls for building on the area's economic strengths, which include proximity to the regional hospital medical complex and a strategic location between Downtown Bellevue and Redmond's Overlake area. Planning Principle 6 stresses the importance of integrating land use and transportation, and the project objective of Transportation Accessibility and Mobility involves improving access for area residents and employees to the regional transportation system. The Steering Committee's selection of the Preliminary Preferred Alternative was guided by – and is consistent with – these principles and objectives.

David Plummer-8b

The DEIS goes beyond the minimum requirements. It is consistent with the intent to provide a meaningful evaluation of the impacts associated with each of the alternatives.

Comments**Responses**

11 Committee ever allowed the public or business/property owners to make presentations to the Steering Committee, thus insulating the Committee from differing views of possible alternatives to the City's proposals, or rebutting the information provided to the Steering Committee by the City staff and the City's consultants. (This point was made by a number of persons who testified at the public hearing on 15 February.)

12 9. Much of the material in the DEIS cannot be verified by careful review and evaluation because of inadequate disclosure of sources and methodology. In addition, there appears to be omissions and conflicts between information in various sections of the DEIS, especially in the chapters dealing with watershed processes, noise, transportation, and utility services. The material and conclusions in the chapter on transportation impacts is virtually unverifiable, and uses difference metrics and models than traditionally used by the Bellevue Transportation Department.

13 10. I urge to your particular attention the fact that this non-project-proposal DEIS is conspicuously lacking any summary of the proposed changes to the City of Bellevue's Comprehensive Plan, the Bel-Red/Northrup Subarea Plan, the Crossroads Subarea Plan, the Wilburton/NE 8th Street Subarea Plan, and the Bellevue City Code. Because proposed changes to these plans and the City Code are not defined in the DEIS, there is no way to be sure that all possible impacts have been analyzed and defined. Moreover, the absence of these proposed changes prevents the public and reviewing agencies from clearly understanding exactly what is being proposed. I consider this condition to fatally flaw this DEIS.

14 I urge you to take a much more active interest in this Project, as it has very significant and costly implications for future citizens of our City. Although the project has a Steering Committee, the committee has no procedures, time, or interest in effectively communicating with Bellevue citizens regarding possible changes in land use within the Bel-Red Corridor, even though, according to the City's operating guidelines for the Committee, they were supposed to "... solicit input from the general public and other key community stakeholders." Likewise, there was no opportunity for public scrutiny or comment on the "goals" for the Project established by the City Council. Moreover, Committee membership was established in camera by the mayor and the deputy mayor, with no input from the other members of the City Council. Indeed, none of the Committee members live in reasonable proximity to the project area, and since they have not sought input from the general public, especially homeowners in nearby residential areas, the Committee's influence on developing alternatives for the Bel-Red Corridor consisted primarily of endorsing Staff and consultant recommendations.

Sincerely yours,


David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007

David Plummer-9b

See responses to Bellevue Chamber of Commerce-13 and -14 and David Plummer-3b.

David Plummer-10b

See response to Bridle Trails Community Club-2 and -3, and David Plummer-21a.

David Plummer-11b

See response to David Plummer-10b.

David Plummer-12b

Regarding the transportation analysis and consistency with other published sources, please refer to the second paragraph in the response to David Plummer- 102a.

David Plummer-13b

See response to David Plummer-89a.

David Plummer-14b

See response to Bridle Trails Community Club-2 and -3, and David Plummer-21a.

David Plummer-15b

See response to Bridle Trails Community Club-2 and -3, and David Plummer-21a.

Comments**Responses**

Examples of equations for forecasting demand for retail floor space:

Equation 1:

$$\text{Total Demand}_{\text{year } t} = -5.986 + 4.556 \ln(\text{Local Population}_{\text{year } t-2}) + 7.845 \ln(\text{Visitor Retail Expenditure}_{\text{year } t})$$

Equation 2:

$$\text{Total Demand}_{\text{year } t} = -8.179 + 6.329 \ln(\text{Visitor Retail Expenditure}_{\text{year } t}) + 4.947 \ln(\text{Working Population}_{\text{year } t-1})$$

Equation 3:

$$\text{Total Demand}_{\text{year } t} = 3.710 + 12.647 (\text{Retail Employment}_{\text{year } t}) - 5.451 (\text{Average Retail Employment per Unit Floor Area}_{\text{year } t})$$

Equation 4:

$$\text{Total Demand}_{\text{year } t} = 2.858 + 38.654 (\text{Total Demand}_{\text{year } t-1}) - 3.197 (\text{Retail Property Price}_{\text{year } t})$$

Equation 5:

$$\text{Total Demand}_{\text{year } t} = -16.632 + 6.190 \ln(\text{Visitor Arrivals}_{\text{year } t}) + 2.426 \ln(\text{Retail Sales}_{\text{year } t}) - 2.961 \ln(\text{Retail Property Price}_{\text{year } t})$$

Equation 6:

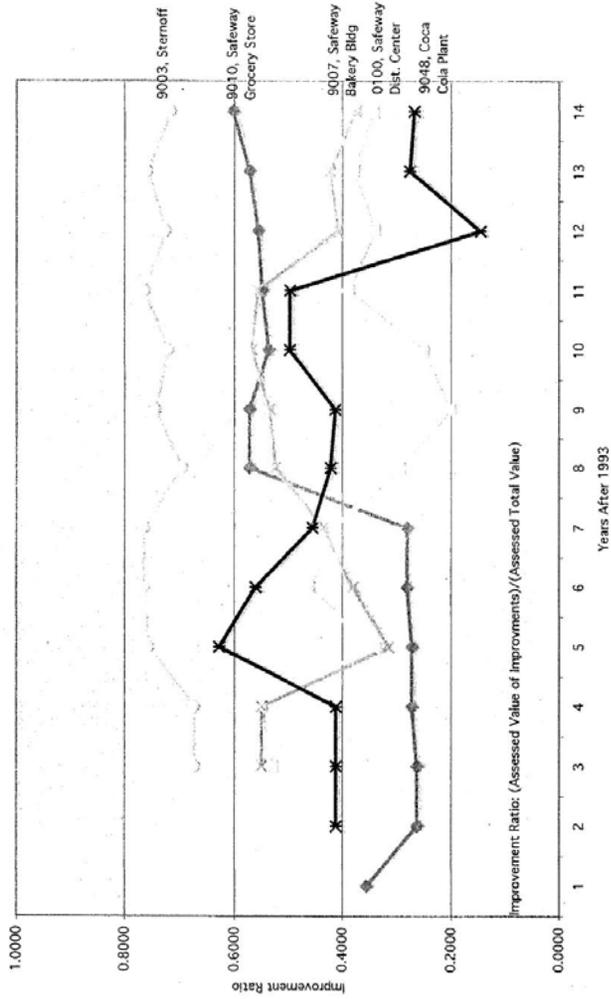
$$\text{Total Demand}_{\text{year } t} = -8.862 + 6.923 (\text{Visitor Arrivals}_{\text{year } t}) + 10.004 \ln(\text{Retail Sales}_{\text{year } t}) - 5.406 (\text{Retail Property Price}_{\text{year } t})$$

where \ln = natural logarithm

Comments

Responses

Figure 6.1. Improvement Ratios for Selected Properties, 1994-2007



Comments

Responses

**Table 7. Average Improvement Ratios for Selected Properties,
Bell-Red Corridor**

Parcel No. (Note 6.)	Year 2007 Imp. Ratio Lnd@Ass.Val.	Year 2007 Imp. Ratio, Land@\$15/Ft	Avg. Impovm't Ratio for 1991-2007	See Note:	Zoning	Land Area, Acres	Year 2007 Land Assesed Value, \$/sq ft.
9010	0.6026	0.6322	0.4252	1	CB	10.17	\$17
9240	Vacant	Vacant	N/A	-	LI	3.32	\$14
0100	0.3479	0.2991	0.3795	2	LI	60.43	\$12
9007	0.3759	0.3252	0.4380	2	LI	8.14	\$12
9048	0.2669	0.2536	0.4151	3	LI	20.16	\$14
9003	0.7212	0.6915	0.7354	2	LI	3.16	\$13
9087	0.6992	0.6683	0.6265	2	LI	2.89	\$13
9091	0.4359	0.3820	0.4857	4	LI	1.22	\$12
9027	0.6129	0.5964	0.5173	5	LI	1.54	\$14
9063	0.5657	0.6227	0.4860	2	GC	2.01	\$19
9179	0.5762	0.5593	0.5736	2	LI	1.13	\$14
9191	0.6080	0.5914	0.4604	2	LI	1.63	\$14
9297	Vacant	Vacant	N/A	-	LI	4.12	\$20
0009	Park Lot	Vacant	N/A	-	GC	0.63	\$42
9190	0.5281	0.5863	0.5423	2	LI	1.07	\$19
9204	0.6200	0.6036	0.6709	2	LI	3.23	\$14
9066	0.3162	0.3694	0.2734	2	LI	1.09	\$19
9296	Wet Land	Wet Land	N/A	-	LI	7.14	\$13
9295	0.1795	0.1489	0.2196	4	LI	8.43	\$12
9026	0.2146	0.2032	0.2868	4	LI	16.47	\$14
0191	0.8598	0.8307	0.8456	2	GC	2.69	\$12
Averages	0.5018	0.4920	0.4930				\$17

Source: King County Assessor 2007 records for individual parcels.

Notes:

1. Average IR value for 1994-2007.
2. Average IR value for 1996-2007.
3. Average IR value for 1995-2007.
4. Average IR value for 1991-2007.
5. Average IR value for 1992-2007.
6. See Table 6 for name of parcel and assessed land/improvement values.

Comments

Responses

Page 1 of 1

O'Neill, Kevin

From: Mike Nielsen [miken@sahg.org]
Sent: Monday, February 26, 2007 12:43 PM
To: BelRed
Subject: Bel-Red Corridor

My name is Mike Nielsen. I am a resident of Bellevue and the Executive Director of St Andrew's Housing Group, a non-profit developer and operator of affordable housing.

1 There needs to be a requirement that any new housing development in the corridor have a minimum requirement of 20% at affordable housing levels.

2 The lack of affordable and workforce housing in Bellevue is significant. Bellevue has fallen far short of its affordable housing goals. This does have an environmental impact and creates a significant impact on issues such as transportation and the quality of workforce attracted to work in our stores, schools and daycare centers. The lack of affordable and workforce housing, coupled with increases in service related jobs in the downtown core, means that a large portion of service sector employees must commute. Currently the median cost of housing in Bellevue is far beyond the reach of much of the workforce that is needed to sustain our community. This includes teachers, childcare workers, bookkeepers, retail workers, bus drivers, administrative support staff, restaurant and salon workers. If we do not have public land use policies that create nearby housing opportunities for our workforce we create an environmental impact through added traffic to already maximized transportation corridors.

3 The lack of affordable workforce housing contributes to increases in traffic pressures on our major highways, the floating bridges and traffic in the downtown core. Planned future development downtown will worsen this problem. Creating an affordable housing requirement to the development of the Bel-Red area will provide the only opportunity Bellevue has to create nearby workforce housing for the downtown core and to help mitigate traffic congestion.

Sincerely,

Mike Nielsen

Mike Nielsen-1

A major challenge for Bellevue and other Eastside cities is the ability to provide affordable housing for all economic segments of the population. While no one area of the city will solve Bellevue's affordable housing challenges, the Bel-Red corridor provides a major opportunity to supplement the citywide supply of affordable/workforce housing. In an area that currently has very limited housing potential based on existing zoning, the Preliminary Preferred Alternative's development program for Bel-Red includes the potential for 5,000 new housing units in vibrant, diverse neighborhoods. Part of the Bel-Red Steering Committee's vision for these neighborhoods, tentatively adopted on June 13, 2007, is that they "will contain a variety of housing types to meet the needs of a diverse population of varied income levels."

Providing a range of housing choices requires a multi-faceted approach. A Regional Coalition for Housing (ARCH) has worked aggressively and collaboratively since 1992 to increase the supply of affordable housing on the Eastside and in Bellevue. Bellevue has been a major financial contributor to ARCH since its inception. Currently, the city has a voluntary (though not often used) citywide density bonus provision and allows transportation impact fee waiver for affordable units. Also, smaller senior units, although not tied to affordability, currently count as half a unit for purposes of density calculation.

Some of the options that the city could consider on a citywide basis or for the Bel-Red corridor include:

- Developing new incentives for density, height and other development standards for affordable/workforce housing.
- Use of the state's multifamily property tax abatement provisions (tied to providing affordable/workforce housing).

Comments**Responses**

- Use of surplus properties for affordable/workforce housing. Remnant sites may be available through infrastructure development in the Bel-Red corridor.
- Explore linking the upzoning of property to a provision that a percent of new units are affordable.
- Seek new or enhanced partnerships with non-profits or employers for developing affordable/workforce housing.

Following the Steering Committee process, the Bellevue City Council and Planning Commission will carefully consider appropriate implementation tools that will guide redevelopment of the Bel-Red corridor, consistent with the new vision. This will occur in Fall 2007 through Spring 2008. How to meet the needs of a “diverse population of varied income levels” is among the issues to be considered in this implementation process.

Mike Nielsen-2

See response to Mike Nielsen-1.

Mike Nielsen-3

See response to Mike Nielsen-1.

Comments**Responses**

Page 1 of 1

O'Neill, Kevin

From: Krista Perkins [kkrp@verizon.net]
Sent: Saturday, February 17, 2007 2:52 PM
To: BelRed
Subject: Draft EIS

I am extremely disappointed in your ability to advertise the release of the DEIS as well as advertise the public hearing that you had on FEB. 15th

I just found out that it has been released - by reading the Bellevue Reporter - that was published on FEB. 17th. Notice the date difference.....

I commented and attended a meeting last year on this subject. You had my email address and could have - and should have contacted everyone who provided preliminary comments to let them know the document was out and that you were holding a public hearing.

And, I go on the web site and there is no information about how you can get a copy. I am unable to download all the information off of the internet. There is no easy access to where a DEIS can be picked up - or if there would be a cost associated with it (there shouldn't be by the way).

What a disappointment in your lack of attempt to involve the public! You should hold another public meeting with adequate PR - and extend your comment period. I will make sure that Department of Ecology is aware of the document release and make sure that they have a copy.....

Krista Rave-Perkins
 12403 NE 28th Street
 Bellevue, WA 98005

Krista Perkins-1

See prior response to Krista Rave-Perkins-1, and responses to David Plummer-21a, Bridle Trails Community Club- 2 and -3, and Stacie LeBlanc- 1.

Comments**Responses**

CITY OF BELLEVUE
 BEL-RED CORRIDOR PROJECT
 DRAFT ENVIRONMENTAL IMPACT STATEMENT
 PUBLIC HEARING
 MINUTES

February 15, 2007
 6:30 p.m.

City Council Chambers
 Bellevue City Hall

Land Use Director and Environmental Coordinator Carol Helland noted that she is responsible for the preparation of all environmental documents, including Environmental Impact Statements (EIS) under the terms of the State Environmental Policy Act (SEPA) and the city's Environmental Procedures Code. She explained that the Bel-Red corridor study is the subject of the Draft Environmental Impact Statement (DEIS) is a plan level EIS, otherwise known as a programmatic or non-project EIS. Accordingly, the document evaluates changes in planning documents, including potential Comprehensive Plan amendments, subarea plan amendments, and amendments to the Land Use Code. The non-project action will not provide entitlement to any specific project; further project-level review will be required at the time any application is submitted for future development.

Ms. Helland said the Bel-Red corridor study DEIS 45-day public comment period will end on March 12. In addition to providing comments during the public hearing on the DEIS, she invited the public to fill out the comment forms and mail them in, or offer comments via email. Ms. Helland asked those providing public comment to be as specific as possible regarding the adequacy of the evaluation, the methodologies used, the mitigation measures outlined, and any other relevant aspect. The Final Environmental Impact Statement (FEIS) will include a response to all comments received and may include modifications to the alternatives, entirely new alternatives, and/or supplemented information.

Ms. Helland declared the public hearing open.

1 Mr. Rich Wagner, Baylis Architects, 10801 Main Street, commented that the study appears to suggest that the line of demarcation is 156th Avenue NE. The fact is the commercial corridor continues past that point, as do the various uses. That factor should be addressed in the document. As drawn, the map makes it appear as though the transit node in that area is on the edge of the commercial district when in reality it is not given that the uses continue on into Redmond. At a minimum, that point should be addressed in the BROTS agreement.

2 Mr. Daryl Banks, Bellevue Auto Rebuild, 1424 130th Avenue NE, voiced concern regarding the possible changes in zoning. He said the businesses like his that are located in the corridor are needed in support of the car dealers in the area. The number of dealerships that have their own collision repair or auto body shops is very limited, thus the dealerships are very dependent on the independent shops and vice versa. In addition, the insurance companies with policyholders in the area are getting more aggressive with regard to convenience, thus they rely on the independent shops to take care of their customers. Comments have been made about having the garages and auto body shops move, but in fact there is no where to move to in the immediate vicinity. There has been a lot said about the need to improve the area for traffic, but little has been said about specific plans for either Bel-Red Road or Northrup even though the vision for the area calls for a lot of housing. Aside from side streets and intersections, the talk has been about light rail going through the corridor. He said a lot of small business owners in the area are counting on their

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Rich Wagner-1

Bel-Red/Overlake Transportation Study (BROTS) reconciliation will include the analysis of the effects on the transportation system of the potential land use changes in both Bellevue and Redmond, especially those changes in the vicinity of the proposed light-rail transit (LRT) station in the Overlake Village area of Redmond. This process is being conducted outside of the Bel-Red Corridor EIS.

Daryl Banks-2

See response to Bridle Trails Community Club-8.

Comments**Responses**

businesses and properties providing them with a retirement when the time comes, and the plans being made for the area may have a negative impact.

3 Mr. David Plummer, 14414 NE 14th Place, said he would also be submitting written comments on the DEIS. He said the DEIS does not adequately nor accurately describe the likely development of the corridor under the no action alternative in that it fails to account for the wide variety of permitted uses in the corridor under the existing Bel-Red/Northrup subarea plan and zoning, and the likely changes that would occur instigated by property owners in contrast to the project action alternatives.

4 The DEIS should clarify the characterization of Sound Transit's plan to deploy light rail transit as part of the East Link project; it should especially note that one route to be examined by Sound Transit's East Link EIS is along SR-520. The DEIS also needs to revise the light rail transit station locations to more closely coincide with the similar vicinity locations shown by Sound Transit in their documentation for the East Link project.

5 The DEIS does not explain the rationale or objectives for the proposal, especially with reference to the city's Buildable Lands Report, and with reference to the presentations made to the Bellevue Planning Commission in September 2004. The Buildable Lands Report and subsequent staff analyses concluded that there was no need to change the city's Comprehensive Plan or to rezone additional properties to higher densities or intensities to accommodate the city's 20-year growth targets.

6 The City Council and the city's Comprehensive Plan have long espoused the theme that future employment and residential growth will be concentrated in the Downtown subarea. As proposed under the DEIS Alternatives 1, 2 and 3, approximately 2.4 to 4.5 million square feet of commercial development, 4700 to 9200 new employees, and 3500 to 5000 residential units, with a population of approximately 6300 to 8700, would create a wholly separated and isolated business and residential center. In spite of the expansive unsupported rationale in the DEIS, the three alternatives would constitute the creation of a small-scale city within Bellevue in direct conflict with the city's commitment to concentrate growth in the Downtown subarea.

7 The Washington Administrative Code states that non-project proposals should be described in terms of objectives rather than in terms of design solutions. The discussion of alternatives for a comprehensive plan EIS for non-project proposals is to be limited to a general discussion of the impacts of the proposal. The published DEIS goes far beyond those requirements and provides excessive and unsupported detailed rationale and data based on unsupported and very limited studies performed by city consultants. The DEIS does not define or rationalize any specific objectives for the Bel-Red project; rather, there is a set of broad, ill-defined goals established, or at least endorsed, by the Bellevue City Council that were not subjected to any public review or input. The DEIS should be revised to identify the specific objectives instead of the so-called goals for the proposal.

8 The DEIS should also be revised to include a reasonable life-cycle cost estimate for the construction, operation and maintenance of the various transportation and other supporting public infrastructure that would be required for the no action alternative and each action alternative.

9 The DEIS vastly overstates the extent of public and business or property owner participation in the development of the three action alternatives, and for the project as a

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David Plummer-3c

See responses to David Plummer-12a through -15a.

David Plummer-4c

See response to Sound Transit- 2. Sound Transit is currently preparing an EIS that analyzes various alignments and station locations for the East Link project, and the SR 520 alignment is being analyzed as part of that process. The scope of the Bel-Red Corridor Project is not to analyze the Sound Transit LRT alternatives, but rather to prepare Bellevue's preferred land use and transportation vision, and thereby help to inform Sound Transit's decision-making process for LRT alignments and station locations.

David Plummer-5c

See response to David Plummer-18a.

David Plummer-6c

See responses to David Plummer-7b and Heidi Benz- Merritt-7.

David Plummer-7c

See response to David Plummer-8b.

David Plummer-8c

See response to David Plummer- 3b.

David Plummer-9c

See responses to David Plummer-21a, Bridle Trails Community Club- 2 and -3, and Stacie LeBlanc- 1.

Comments

whole. There has been very limited input from a broad range of Bellevue citizens and only a limited input from very few business and property owners. In addition, neither the city or the project steering committee ever allowed public or business property owners to make presentations to the steering committee. Thus they were insulated from differing views of possible alternatives to the city's proposals.

Much of the material in the DEIS cannot be verified by careful review or evaluation because there is inadequate disclosure of sources and methodologies. In addition, there appear to be omissions and conflicts in the information in various sections of the DEIS, especially in those chapters dealing with watershed processes, noise, transportation, and utility services.

The information in Appendix H should be incorporated directly in Chapter 11. It is not stated why it was isolated as a separate chapter. It should include reference to Puget Sound Energy's long-range electric power generation source and natural gas supply plans.

Mr. Chris Mool, Crescentview Investments, 2211 156th Avenue NE, said he is a new landowner in the Bel-Red corridor, having recently taken ownership of Angelo's Home and Nursery Center. He said the opportunities for that site are exciting. It is good that the land at the very eastern end of the study area has been included; it holds opportunity for a gateway to the corridor. In developing the property, the focus will be on senior citizens and independent living. In addition, there will be a mixed use component that could include retail and other uses. The plan does not at the moment include much definition as to the types of uses that could fit into the mix; he said as he continues to explore his site he looks forward to offering the steering committee with observations regarding the development opportunities.

Ms. Cindy Ludwig, 12336 NE 24th Street, said the Bridle Trails Community Club will be submitting written comments at a later date. Speaking for herself, she voiced concern over the fact that nothing in the DEIS reflects the comments made by the Bridle Trails community at the public meeting held in June 2006. The current light industrial zoning in the Bel-Red corridor is the most conducive use with the Bridle Trails neighborhood; the use complements the Bridle Trails neighborhood. There are a lot of businesses there the residents use. The level of detail contained in the DEIS is not sufficient to determine if allowing the area to convert to retail and commercial uses would be a good idea or not. If the area is rezoned, the neighborhood will lose the opportunities it has had to comment on requests for variances to bring in different uses. Good decisions have been made in the past because of that process. Preliminarily, it appears the no action alternative will be best for the neighborhood. The transportation numbers listed in the EIS are suspect; the sources are not disclosed and the formulas used are not clear. The numbers appear to be understated and calculated to support the proposal. The Bridle Trails neighborhood experiences a lot of cut-through traffic on NE 24th Street and is not interested at all in the proposed exits and entrances at 124th Avenue NE and SR-520. There are just too many unknowns. If the basis of the study is to rezone the Safeway properties sensibly, that should be the focus rather than rezoning the entire corridor. There is no reason to make any other change to the corridor.

Mr. Greg Johnson with Wright Runstad, address not stated, said the company is under contract to purchase a portion of the Safeway property between 120th Avenue NE and 124th Avenue NE. He complimented the city on the DEIS in that it captures the vision of the steering committee and the public input offered to date. Wright Runstad is excited to be part of the process, which is utilizing solid planning principles. He encouraged the city to go as

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Responses

David Plummer-10c

Comment noted. The methodologies undertaken by each discipline to evaluate potential impacts are documented in the first section of each chapter. It is not possible to appropriately respond to the comment regarding perceived omissions and conflicts without additional clarification.

David Plummer-11c

Comment noted. In a previous comment, the commenter requested deletion of this material due to its complex and detailed nature. Puget Sound Energy has indicated that the project is consistent with its long-range planning for electrical generation and natural gas service to Bellevue and the Eastside.

Chris Mool-12

Comment noted.

Cindy Ludwig-13

Comment noted.

Cindy Ludwig-14

See response to Bridle Trails Community Club-5, -7, and -12. It is assumed that the "transportation numbers" to which the comment is referring are the peak hour traffic volume forecasts reported in the DEIS. The source of these traffic forecasts were disclosed in the third paragraph of page 10-1, and restated here from the Bellevue-Kirkland-Redmond (BKR) model. This model was created in 1992 and has been updated annually by the City. This model is the primary source of traffic volume documentation used by the City. Traffic volumes have not been understated or calculated to support the proposal. Simply stated, the land use data for each alternative were input to the BKR model, and the model, unbiased and unchanged by humans, determined the number of trips and distribution of trips on the transportation system.

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15 far as possible in addressing impacts and mitigations, and in developing as much data as possible. In addition, the role of the city in providing the necessary infrastructure should be identified. The key will be in providing a clear and concise framework that will allow for predictability through 2030 so that when project-level environmental work needs to be done it will not be necessary to generate a lot more new data. The intent of Wright Runstad is to develop the old Safeway site with a state-of-the-art sustainable project that will respect what exists in the corridor currently and helps to realize the potential for the future.

16 Mr. Todd Woosley, co-owner of Briarwood Center at NE 12th Street and 120th Avenue NE in the western section of the Bel-Red corridor study area, said he has been following the process from the beginning. He noted his support for the programmatic EIS approach used, a method that will obviate the need for individual property owners to go through the process again and again. He agreed with the previous speaker that the city should pursue the generation of data to assure predictability for everyone involved. Within the next ten to twenty years it is possible that Briarwood Center will be redeveloped to a higher and better use. However, three of the four alternatives will result in no increase in the value of the property. Worse yet, a road is proposed to run through the middle of the property, something that was never communicated in all the conversations held with the city. 17 Furthermore, the intersection that is shown to experience the largest increase in traffic is the main intersection that serves the tenants and customers accessing Briarwood Center. It is, however, early in the process and there is reason to be optimistic that as the process moves forward solutions will be found.

18 There are concerns with regard to the accuracy of some of the information included in the DEIS. The CH2MHill report talks about the need to acquire right-of-way. For the extension of NE 10th Street from 116th Avenue NE to 124th Avenue NE, the report indicates that up to two retail buildings, portions of an auto dealership and two warehouses might be impacted or displaced; in fact, closer to 20 properties will be impacted, and the assessed valuation of those properties is over \$46 million. The assessed valuation of the properties between 120th Avenue NE and 124th Avenue NE is over \$16 million. The city does not have the nearly \$80 million it will need to purchase the properties needed for projects that will likely not offer commensurate benefits for congestion relief in the area; the focus should be on a more practical approach. In addition, more information should be included with regard to mode splits, including the category of transit/walk, which needs to be separated out so it can be determined how each mode will affect the overall traffic picture in the Bel-Red corridor.

19 The accuracy, detail and accessibility of the information needs to be improved. The city should also seek to significantly refine its recommendations and bring in fiscal realities for transportation infrastructure as well as market realities for private redevelopment in the area.

20 The accuracy, detail and accessibility of the information needs to be improved. The city should also seek to significantly refine its recommendations and bring in fiscal realities for transportation infrastructure as well as market realities for private redevelopment in the area.

21 Mr. T.J. Woosley, co-owner of Briarwood Center and a commercial real estate broker and manager, allowed that it will take a very long time for the Bel-Red corridor to redevelop. One of the things that seems to be missing from the DEIS is the need to retain as much flexibility in allowed uses as possible to avoid creating legal nonconforming uses. The steering committee, the Planning Commission and the City Council should be encouraged to make sure that will not occur as zoning changes occur in the area. Where legal nonconforming uses exist, tenants tend to shy away and long-term vacancies can result. The flexibility to allow all of the existing uses in the area to continue operating as the area redevelops will be critical.

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The model, in fact, showed that if the 124th Avenue NE interchange were not completed, traffic volumes into Bridle Trails would actually increase with or without the land use changes proposed in the Bel-Red Corridor. Without the completion of the interchange, there would be fewer options for drivers, and as a result, cut-through traffic into neighborhoods could be expected to increase.

Wright Runstad & Co.-15

Comment acknowledged. Long-range land use and transportation system planning are being conducted concurrently and at a programmatic level in the Bel-Red Corridor Project, consistent with City Council Bel-Red Corridor Planning Principle 6. Individual land development and infrastructure projects will be required to provide more detailed, project-level environmental analysis.

Todd Woosley-16b

See response to Wright Runstad & Co.-15.

Todd Woosley-17b

Comment noted. Significant transportation system improvements to support the land use vision are proposed as part of the Preliminary Preferred Alternative.

Todd Woosley-18b

See response to Todd Woosley-3a. The Bel-Red Corridor EIS is a programmatic assessment of the impacts that could occur as a result of the proposed land use changes and transportation improvements. The design details of specific transportation projects that could be implemented are as yet unknown. As such, the analysis describes only the number of parcels affected, not the number of buildings or the specific tenants of those buildings. If projects are implemented in the future, detailed design would seek to minimize right-of-way acquisition and residential or business displacements to the greatest extent possible.

Comments**Responses**

22 Originally, it was understood that the steering committee would be made up of community members, property owners and business owners from the Bel-Red subarea, but that is not the case. While the steering committee has openly engaged in discussions with the community, there should be representation by involved business and property owners.

23 Ms. Linda James, owner of Evergreen Center located at 1800 through 1950 13th Avenue NE, and the owner of properties on 132nd Avenue NE and NE 16th Street beyond 136th Avenue NE, said she has followed the study process carefully and remains concerned that a sufficient number of business and land owners from the Bel-Red area have not been heard in the process. It is unfortunate that business and land owners do not have representation on the steering committee. While there are two members of the business community on the steering committee, their businesses are not currently located in the corridor and their lives will not be impacted a great deal by the decisions that will be made. Change is inevitable, but the change would be easier to take with more input. With rezoning will come an increase in taxes and rents, and that will force some tenants out. Redevelopment will burden long-time businesses with having to move to another location; the businesses that may have to relocate include Angelo's Restaurant, Flowers First, Little Gym, and Olympic Office Supply.

25 At the most recent steering committee meeting, the consultant CH2MHill mentioned the idea of doubling the setbacks for properties near streams. The City Council only recently acted to adopt the critical areas ordinance that establishes the current setbacks. Ms. James said three of the properties she owns in the corridor have streams running through them; two of the properties are very narrow, and if the setbacks were increased it would be very difficult to rebuild.

26 The new Zoning Code needs to allow for a wide variety of uses, including contractors, warehouses, and auto work. Flowers First moved from NE 20th Street to its current location on 130th Avenue NE and found the use was not permitted under the LI zoning. The owner worried for ten years that the city would eventually force the business to move elsewhere; eventually the city concluded that because the business includes the creation of products from raw materials it is in fact allowed in LI.

27 Six months ago a high-end used car company wanted to rent space in Evergreen Center. The city concluded that the zoning would not allow the business to operate there. A car rental business is now interested in the same space and the city has concluded that such a use is allowable.

28 Table 1.3 on page 113 of the DEIS states that mitigation could include city assistance in finding relocation opportunities in the corridor or elsewhere in Bellevue, and revisions to the Zoning Code to allow certain types of industrial services uses in the Bel-Red corridor mixed use zones. Ms. James suggested the statement should be changed to read "...the city needs to include assistance in finding relocation opportunities...."

Mr. Leonard McGhee with Sound Transit, 401 South Jackson Street, Seattle, said Sound Transit has worked closely with the city for more than a year on the Bel-Red corridor project. He noted that Sound Transit will be providing written comments regarding the DEIS prior to the public comment deadline. The Sound Transit board recently took a large step toward bringing a light rail extension package to the voters in the fall of 2007. The board adopted a package that would expand light rail to the north, south and east to connect

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Todd Woosley-19b

See response to Kemper Development- 15. All of the mode split data available have been documented in the DEIS. The Bellevue-Redmond-Kirkland (BKR) model is not capable of quantifying nonmotorized trips (pedestrian and bicycle) other than those associated with transit. The DEIS documents Transit/P&R trips and Transit/Walk trips. It is important to note that the both of these categories are ultimately transit trips, but one group originates from a park-n-ride, and the other originates from at a transit stop not associated with a park-n-ride lot.

Todd Woosley-20b

Comment noted. A market analysis was conducted at the outset of this project – upon that analysis much of the development program is based. Cost implications of the transportation infrastructure will be considered as a component of the implementation strategies to be developed outside of the EIS process.

T.J. Woosley-21

See response to Bridle Trails Community Club-8.

T.J. Woosley-22

See responses to David Plummer-21a, Todd Woosley- 1a, and Bridle Trails Community Club-2, -3, and -7.

Linda James-23a

See response to David Plummer-21a, Todd Woosley- 1a, and Bridle Trails Community Club -2, -3, and -7.

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even more communities to the light rail system. Under the package, light rail would extend north from the University of Washington to Lynnwood, south from SeaTac Airport to the Port of Tacoma, and east as far as Redmond's Overlake transit center via downtown Bellevue and the Bel-Red corridor. The board also included funding for planning, preliminary engineering and some property acquisition, emphasizing its commitment. Sound Transit is pleased to see the city of Bellevue looking to leverage the opportunities created by the potential of light rail transit in the corridor. The actions are consistent with the objectives of Sound Transit, the state Growth Management Act, and Vision 2020. Sound Transit and the city of Bellevue share a common interest in the Bel-Red corridor.

29 Three of the four alternatives under study by Sound Transit utilize the NE 16th Street corridor, part of which is developed and part of which is proposed to be developed. The light rail alternatives under study by Sound Transit support the development nodes in the corridor that are being studied by the city in the DEIS. In making alternatives viable and working to identify savings to allow for the extension of East Link as far as possible, support from the city will be critical. The NE 16th Street corridor has the potential for providing a lucrative transit market, but it will be necessary for Sound Transit to also study an alignment along SR-520 should the city decide not to change land uses in the corridor or should the NE 16th Street alignment be found to be infeasible for some reason.

30 In the December 15, 2005, letter from Sound Transit to the city regarding the Bel-Red corridor project, it was stated that in addition the East Link project will require the siting of a 15- to 20-acre maintenance facility site to the east of I-405 in the corridor. In addition to identifying routing and station alternatives to be studied in detail in the East Link DEIS, the Sound Transit board has directed its staff to identify four alternative maintenance facility sites; three of them are located in the Bel-Red corridor. These locations are not identified in the Bel-Red DEIS. It will be important for the Bel-Red corridor project to permit the siting of the essential public facility.

Mr. Darin Croston with the Coca Cola Bottling Company located at 124th Avenue NE and Bel-Red Road, thanked the steering committee, city staff and local business and property owners for allowing Coca Cola to be part of the process from the beginning. He said the company has had ample opportunity to offer comments at critical stages and has been made to feel welcome.

Coca Cola intends to maintain its status in the corridor for both the short and long terms. The DEIS appears to treat all light industrial activities as somewhat of a dying breed. That is definitely not the case for Coca Cola, and the intent to remain in the corridor will require an appropriate zoning. The company recently made investments in excess of \$17 million at the Bellevue facility, including more than 80,000 square feet of new space, most of which is being used for warehouse and distribution. The company employs hundreds of people directly in operations and contributes indirectly to thousands of businesses in the Puget Sound region. The company has a significant economic impact on the area and participates in local programs such as youth development and education, neighborhood revitalization programs, many local charitable causes and sponsorships, and various environmental activities, including energy conservation and recycling. Coca Cola is committed to being a responsible corporate citizen and will continue to make a positive difference in the community.

31 Coca Cola does not wish to become a nonconforming use under the Comprehensive Plan or development regulations. The company desires the steering committee to select an

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Linda James-24a

See response to David Plummer-21a for an overview of the public involvement opportunities afforded to business and property owners in the Bel-Red Corridor. Also see responses to Todd Woosley- 1a, and Bridle Trails Community Club-2, -3, and -7.

Linda James-25a

See response to Bellevue Chamber of Commerce- 12. Regulatory issues that directly impact specific properties will be addressed through specific implementation strategies to be developed after the Preferred Alternative is selected. The Steering Committee direction is to rely on the existing critical areas ordinance for regulations that apply to redevelopment, and to provide incentives and City programs to enhance stream corridors and wetlands.

Linda James-26a

See response to Bridle Trails Community Club-8. Any potential new zoning placed on properties in the corridor will take into account the appropriate mix of uses consistent with the Steering Committee's vision. The future zoning may include uses that are not currently permitted, and it may exclude new uses of types that are currently permitted.

Linda James-27a

See response to Linda James-26a.

Linda James-28a

Comment noted.

Sound Transit-29b

See response to Sound Transit- 2. Sound Transit is preparing an EIS that includes alignments and station locations that were not analyzed in the Bel-Red Corridor Project DEIS.

Comments

alternative that will allow the company to stay and thrive in the corridor as a permitted use.

32 Mr. Bob Sternoff, 255 7th Avenue South, Kirkland, said he has been associated with the Bel-Red corridor for the past 50 years. He noted his dismay at not having every area that will be affected included in the study area. He said he owns property that lies just outside the study boundaries. Whenever an impact statement is developed, it must take into consideration all of the areas and people that may be affected. For the properties along the south side of Bel-Red Road, that has not happened. Those property owners were told by the steering committee that they will not be included. Whatever happens across the street will impact those properties directly. The fatal flaw in the DEIS is that those property owners were not considered. There are some six properties between 124th Avenue NE and 130th Avenue NE that will probably be redeveloped in the next several years. At the same time, the uses in place currently are rather limiting and do not represent well what the future holds.

33 The degree to which property and business owners have not been invited to participate as part of the steering committee is bothersome. A significant number of local property owners should be involved in order to offer different perspectives.

34 The Bel-Red corridor is home to several light industrial uses, and once light industrial is force out it will be hard to bring it back. The goods and services that come from light industrial areas are necessary to the city as a whole; they should not be driven to other cities.

Change is always difficult. Where a change is going to be made, it should be predicated on all the possible input from everyone who may be affected currently and on into the future.

Absent additional speakers, Ms. Helland declared the public hearing closed and thanked everyone for their participation.

Responses**Sound Transit-30b**

The Preliminary Preferred Alternative references a light rail maintenance base within the Bel-Red Corridor study area, near the Burlington Northern Santa Fe (BNSF) right of way east of 116th Avenue NE and north of NE 12th Street. This is one of the proposed locations Sound Transit is analyzing and will be further evaluated in Sound Transit's East Link environmental review process.

Coca Cola Bottling Co.-31b

See response to T.J. Woosley-21 and Bridle Trails Community Club-8. The Preliminary Preferred Alternative provides for the Coca Cola Bottling Company of Washington to remain in the Bel-Red Corridor without the stigma of being a nonconforming use.

Bob Sternoff-32

See response to Billy Joe Park LLC-1.

Bob Sternoff-33

See responses to David Plummer-21a, Bridle Trails Community Club- 2 and -3, and Stacie LeBlanc- 1.

Bob Sternoff-34

See responses to Heidi Benz-Merritt-14 and to Bridle Trails Community Club-8. The DEIS acknowledges that a loss of light industrial jobs from the area is likely if land use and zoning changes are made as a result of the Bel-Red Corridor planning process. At the same time, it should be noted that the Preliminary Preferred Alternative identified by the Steering Committee, while not including a designation where light industrial uses is favored, does not make light industrial uses nonconforming.

Comments

Responses

Coca-Cola Bottling-1c

See response to Coca-Cola Bottling-1a.

Coca-Cola Bottling Company of Washington

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February 15, 2007

Terry Lukens and Mike Creighton
Co-Chairmen
Bel-Red Corridor Steering Committee
City of Bellevue
PO Box 90012
Bellevue, WA 98009

Re: *Local Coca-Cola Bottling Company of Washington DEIS Hearing*

Dear Chairman Lukens and Chairman Creighton:

Thank you for the opportunity to attend the hearing on the Bel-Red Steering Committee Draft Environmental Impact Statement. As indicated in our prior public comments and presentation to the Steering Committee, the Coca-Cola Bottling Company of Washington ("CCBCW") has made a significant investment in this uniquely located site, and looks forward to being part of the long-term vision for this area.

We are still evaluating all of the detailed information presented in the DEIS, and will be providing a written comment letter prior to your March 12 deadline. At this time, we simply want to restate that our desire to stay and grow in the corridor has not changed. We do not want to become a nonconforming use under the comprehensive plan or development regulations. We therefore urge you to choose a preferred alternative that allows CCBCW to stay and thrive at the Bel-Red site as a permitted use.

The City's Preferred Alternative Should Retain Appropriately Zoned Land for Our Use, Such as the Light Industrial Sanctuary Concept.

The Steering Committee is charged with the task of recommending a preferred alternative. We encourage you to recommend a preferred alternative that allows CCBCW to stay and grow as a permitted use, and to protect it from incompatible encroaching uses. Based on the alternatives in the DEIS, we think there are several good options. Alternative 2 appears to most closely meet our objectives, by preserving a Light Industrial sanctuary. Alternatively, it is possible that the LI sanctuary could also be combined into Alternatives 1 or 3. Finally, it is possible that the final EIS could explore new alternatives, such as an overlay district.

Comments**Responses****Coca-Cola Bottling-2c**

See response to Coca-Cola Bottling-7a.

Under any of these scenarios, we think we can make a positive contribution to the Bel Red area as the process goes forward.

Our use is a significant contributor to the economic vitality of the area.

We have previously commented on the economic study, in that it does not convey the importance of individual light industrial uses such as our own. The DEIS unfortunately seems to perpetuate this same view that all industrial uses are dying and moving out of Bellevue. This is not the case.

CCBCW employs hundreds of people directly in its operations, but thousands more are employed by businesses in Bellevue and throughout the Puget Sound region that play a major support role for our operations. Our supply chain includes in-state businesses that we rely upon for the materials needed to get our products "out the door". Other regional businesses also support our sales and marketing efforts. CCBCW has a significant economic impact on the area in that we are job creators and provide meaningful, stable work in the broader manufacturing/business sectors in Bellevue and in the greater Puget Sound area as well.

The CCBCW Bellevue production facility within the Bel-Red corridor is of critical importance to the local bottling company. The facility is strategically located near SR 520 and the 405 in the middle of a key distribution district for the greater Puget Sound area. The facility is over 180,000 sf in size and employs approximately 438 people with a payroll of over \$18 Million. CCBCW recently made a significant capital investment of approximately \$17 Million to accommodate the Dasani water bottling enterprise, resulting in a 78,000 square foot expanded warehouse and 7,000 square foot fleet building.

CCBCW is committed to stay and grow at this location; therefore, it is critical that the area be zoned appropriately. The cost of a move would be prohibitive; moreover, there are simply no similar sites available, suitably zoned and located that can serve this purpose and need.

CCBCW Can Be Part of a Vibrant Future for this Evolving Area.

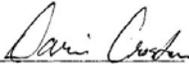
We realize that the City's vision for this area may be changing and evolving; however, CCBCW is a clean, light industrial use that can be a vibrant part of the future vision of this area. The fact that Wright Runstad is willing to invest in the Safeway site shows that we can be a compatible neighbor and not a detriment to change. Moreover, as a local company, CCBCW participates in youth development/education partnerships, neighborhood revitalization programs, environmental/recycling initiatives, and local charitable causes and sponsorships. CCBCW is committed to being a responsible corporate citizen and part of the future vision for this area.

Comments

Responses

CCBCW is committed to continued growth in all of its local business operations. It has made a positive difference in the community, and we hope the Steering Committee will agree that CCBCW should be a welcomed part of any future vision for the area.

Very truly yours,

By 
& 

Enclosure

cc (w/Encl): Steering Committee Members
Matthew Terry, City of Bellevue
Carol Helland, City of Bellevue
Kevin O'Neal, City of Bellevue
Kevin McDonald, City of Bellevue

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Comments**Responses**

My name is Linda James. I am one of the owners of Evergreen Center, located at 1800 – 1950 130th Ave. NE. I also own properties on 132nd and 16th beyond 136th.

I have followed this process carefully. I remain very concerned that a sufficient number of business owners and landowners of the Bel-Red Area have not been heard in this process. In my view it is unfortunate that we are not represented on the Steering Committee. I appreciate that there are at least 2 members from the business community on the Steering Committee, however, they are not currently located in Bel-Red and their lives will probably not be impacted a great deal by these decisions.

Change is inevitable. However, it might have been easier to take, if we had more input into the process. My concerns are:

- 1) Taxes and rents will rise quickly with the rezoning, which will force some tenants out.
- 2) Redevelopment will burden longtime businesses with moving to another location such as Angelo's Restaurant (tenant since 1980), Flowers First (1996), Little Gym (1988) and Olympic Office Supply (1983).
- 3) At the last meeting the CH2MHill consultant mentioned that you might want to double the setbacks on properties near streams. This issue was recently addressed by the City Council in the Critical Areas Ordinance. I am one of the owners of 3 properties that are situated on streams in Bel-Red. Last week the COB told me that the setbacks at present exist where the buildings are located. Two of these properties are

Linda James-1b

Comment noted.

Linda James-2b

Comment noted.

Linda James-3b

See response to Bellevue Chamber of Commerce- 2, and Linda James- 25a.

Comments

- very narrow so that, if the setbacks were increased, it would be difficult to rebuild.
- 4) The new zoning code needs to allow for a wide variety of uses such as contractors (RBI Construction, Tri-Mechanical & Audio One) for improvements to homes and commercial spaces, warehouses for Olympic Office Supply, shop space for Reprographics Northwest (tenant since 1983), auto work such as Alignments Plus (tenant since 1990).
- 5) Flowers First moved around the corner from 20th to 130th and then found that she was not allowed on 130th, which is zoned Light Industrial. However, as her business prospered, she worried for 10 years that she would be forced to move again. When I became aware of this, I interceded for her with the COB. She now has a letter from the COB, which states that she may stay on 130th because she creates from raw materials and delivers them. Therefore she belongs in Light Industrial.
- 6) Six months ago a high-end used car company wanted to rent a space. The zoning did not allow their business without a six-month process and \$1000. Now we have a rent-a-car business interested in the same space. They are allowed. The cars are virtually the same. The space has been vacant for 6 months.
- 7) In the DEIS Table 1-3 p. 1-13 under Land Use states that mitigation could include City assistance in finding relocation opportunities in the corridor or elsewhere in Bellevue + revisions to the zoning code to allow certain types of industrial + service uses in Bal-Red corridor mixed-use zones. I would like to change this statement to read "needs to include", City assistance in finding relocation opportunities ...
Thank you.

Responses

Linda James-4b

See response to Bridle Trails Community Club-8. Any potential new zoning placed on properties in the corridor will take into account the appropriate mix of uses consistent with the Steering Committee's vision.

Linda James-5b

See response to Bridle Trails Community Club-8.

Linda James-6b

See response to Linda James-4b.

Linda James-7b

Comment noted.

Comments

Responses

Page 1 of 2

O'Neill, Kevin

From: Jim Loring [design@eskimo.com]
Sent: Sunday, February 11, 2007 2:08 PM
To: BelRed
Subject: Eastside Rail

Bel-Red Corridor Project Steering Committee

Bel-Red Corridor Project
 c/o Mr. Kevin McDonald
 450 110th Avenue N.E.
 P.O. Box 90012
 Bellevue, Washington 98009
 e-mail BelRed@ci.bellevue.wa.us

11 February 2007

Dear Mr. McDonald,

In reviewing the SEPA Scoping Report for the Bel-Red Corridor Project, it appears that the BN&SF Eastside Rail Corridor has not been included for review. I am sure you and members of the Committee are aware of the limitations of attempting to plan an urbanizing area as encompassing as the Bel-Red Corridor area of study. The exclusion of the existing BN&SF railway illustrates the impossibility of top-down area-wide planning - covering an extremely long time frames - as requiring an all encompassing knowledge and oft predicated on previous assumptions which events prove folly.

Although the BN&SF right-of-way was not included in-depth in the WSDOT I-405 Corridor Project EIS process, the railway adjoining the Bel-Red Corridor - from a land-use perspective - should be further examined. With the uncertainty of Sound Transit 2 and final potential light-rail route selection, an inclusive study would include the existing BN&SF line as an "informal alternative" for Committee discussion. If memory serves, I made brief mention of this in my submitted comments during Scoping.

It has become apparent the WSDOT I-405 Corridor Project EIS's exclusion of the existing rail corridor ("*Eastside Rail*") precipitated a cascade of errors. The potential loss of the Spirit of Washington Dinner Train, regional freight mobility, complications arising from King County's exchange of regional public assets with the Port of Seattle, increasing resistance to the plan converting the existing railway to a trail-only regional facility, and increasing public support of the existing rail line all indicate *Eastside Rail* should be included in the discussions. Coupled with the uncertainties of potential light-rail route selection and outcome of Sound Transit 2 financing, the Committee should take into consideration this existing rail asset.

In reality our knowledge is imperfect, and it is my understanding that things have changed in regard to the BN&SF railway since the I-405 Corridor EIS. The loss of the existing tracks would impede regional freight mobility, eliminate the Spirit of Washington Dinner Train, and preclude future rail for the Eastside. It is becoming increasingly apparent that the light-rail currently under consideration may not be viable, and that an *Eastside Rail* alternative must be taken into consideration.

Regards,

Jim Loring

Jim Loring-1

The Bel-Red Corridor Project is considering the Burlington Northern Santa Fe (BNSF) right-of-way as a potential nonmotorized transportation corridor, consistent with the regional planning efforts. As such, pedestrian and bicycle connectivity to this trail is part of the vision embodied in the Preliminary Preferred Alternative. It is understood that the future use of the BNSF corridor may include commuter rail together with a multipurpose trail.

Jim Loring-2

Comment noted. Planning for the future use of the BNSF right-of-way is outside the scope of the Bel-Red Corridor Project

Comments

Responses

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Jim Loring
1815 153rd Avenue South East
Bellevue, Washington 98007-6141
[e-mail design@eskimo.com](mailto:design@eskimo.com)

Comments

Responses

O'Neill, Kevin

From: sharonced@hotmail.com
Date: Monday, January 29, 2007 2:43 PM
Subject: Bel-Red
 Bel-Red Corridor Project Comment

Date Sent: 1/29/2007 2:43:05 PM

City: bellevue
 Name: sharon cedola
 Address: 14418 Ne 10th st
 Mailing List: Yes

Comments: u want to add more traffic to the bellevue-redmond area. Have u ever seen what traffic is like on 148th and 140th around 8th during rush hour? To go shopping, at this time of day, I plan my trip to go with traffic. That means, I do not go on 148th to 8th, I go down 14th, right on 140th, right on bel-red, right on 148th, then left on to 8th. Why because, even though traffic is not suppose to block streets, I can't get on 148th from 10th. Too many one occupancy cars are going down 148th to 90. 140th used to be clear, but now 140th is just as heavy. You have two lanes merging into one lane at bel-red. traffic is great, any time but rush hour traffic, because the commuters are not using the highways, they are using 140th, 148th, and 8th. So I have this to say, drive the major streets at rush hour and figure out how traffic flows before you add more congestion. Traffic is getting worse because the highways are not accessable from the work areas.
 State: wa
 Zip: 98007

Sharon Cedola-1

See responses to Bridle Trails Community Club-5 and -7. Several transportation system improvements are proposed to help support the Preliminary Preferred Alternative land use vision, including new access to SR 520 at 124th Ave NE. Expanded arterials, a new east-west corridor along an extended NE 16th Street, increased transit service including light rail, plus pedestrian and bicycle facilities are all in the mix to enhance people's mobility to and through the Bel-Red Corridor.

Comments

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O'Neill, Kevin

From: The Leo J Bolles Clinic [bolles@bollesclinic.com]
Sent: Monday, January 29, 2007 2:56 PM
To: BelRed
Subject: Bel Red corridor project

Kevin

Hello, we own commercial property at 15611, 13, 15 and 15617 Bel Red Road. This is just outside the small extended area of the project. I am wondering if we can be considered to be added to the project. We are the last property before the residential area begins. We are behind the Nursing home care facility on 2.5 acres. I have often thought that in the future their will be a building upgrade for us. We are currently underbuilt for our lot size. We have about 20000 square feet. I did some research in the past and discovered it might be possible to upgrade to a 40000 square foot building roughly. We would have to go up to achieve this as we are one story now. I have also thought that are land might be good for a retirement apt situation or even Condos/townhouses since we are on a borderline of commercial and residential.

I was wondering how we could get included in the plan or even if that would make sense.

What do you think?

Sincerely
Edward Bolles

Responses**The Leo J. Bolles Clinic-1**

See response to Rich Wagner - 1. The limits of the Bel-Red Corridor Project study area, as established by the City Council, do not extend east of 156th Ave NE. The referenced site is outside of the study area.

Comments

Page 1 of 1

O'Neill, Kevin

From: Heather R. Jacobs [heather@realloans4realpeople.com]
Sent: Sunday, January 28, 2007 8:43 AM
To: BelRed
Subject: Exciting!
Attachments: Heather R Jacobs.vcf

As a business owner in the corridor, I am excited by the prospect of large growth. I must admit my lofty goal this year was to lobby for a Starbucks in the Lake Bellevue/Bel-Red area. I'm glad someone is thinking much bigger than that. :)

- 1 There are so few housing options for workers in that area. We must choose pockets of ultra urban downtown, multi-cultural Crossroads, hidden Wilburton and ridiculously expensive Bridle Trails. This will put Bellevue on the map in earnest as long as infrastructure keeps up.

I'm ready for the growth!

Heather Jacobs
AMS Mortgage
2000 116th Ave NE

Responses**Heather Jacobs-1**

See response to Habitat for Humanity-1.