



BEL-RED CORRIDOR PROJECT

DRAFT ENVIRONMENTAL IMPACT STATEMENT



DEIS COMMENTS



RECEIVED DURING THE
45-DAY COMMENT PERIOD
JAN 25 – MARCH 12, 2007



City of Bellevue

JANUARY 25, 2007



**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 206-464-1286
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.

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.

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.

Ms Carol Helland
BelRed DEIS comments
March 12, 2007
Page 3

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

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

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Sincerely,

Tom Washington
Senior Transportation Planner

3/13/2007

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.

O'Neill, Kevin

From: daryldiane@comcast.net
Sent: Monday, March 12, 2007 10:47 AM
To: BelRed
Subject: 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.

State: WA
Zip: 98004

O'Neill, Kevin

From: JimHunt@NWLink.com
Subject: Monday, March 12, 2007 5:48 AM
BelRed
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.

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.

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.

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



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.

Land Use and Assumptions

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.

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.

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.

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.

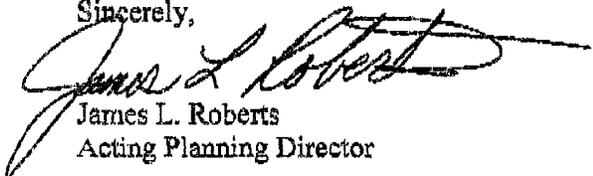
Much of the remaining transportation analysis is consistent with the City of Redmond's transportation planning related efforts, in particular Redmond's Overlake Neighborhood Plan Update. The assumptions in the Draft EIS related to the light rail planning, regional projects included in the 2030 model, 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



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.

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.

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.

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.

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

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

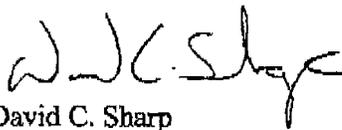
There are additional reasons to support higher densities in this area. Higher densities will be necessary for the City of Bellevue to maintain a competitive advantage over other Eastside cities as the premier location for medical related uses. Because the supply of land adjacent to OHMC is extremely 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.

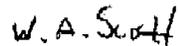
We support having LRT cross I-405 at NE 12th Street, with a station at NE 12th Street and 116th Avenue NE. A station at this location would serve several purposes. First, it would provide a station adjacent to what will probably be the greatest number of jobs in the area. Second, it will not conflict 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 Bed-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

March 7, 2007

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

RECEIVED

MAR 12 2007

Development Services

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.

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 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.

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.

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

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.

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,

A handwritten signature in black ink, appearing to read "Janet Donelson", with a horizontal line extending to the right.

Janet Donelson, VP of Facilities
Overlake Hospital Medical Center

cc: Craig Hendrickson
Caitlin Hillary
Sarah Langton

Coca-Cola Bottling Company of Washington

a COCA-COLA ENTERPRISES company

March 12, 2007

1150 124th Avenue NE
Bellevue, WA 98005
425-455-2000
425-453-2789 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



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.

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.

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.

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.

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.

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

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

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%w01!.doc 3/9/2007

March 9, 2007

TG: 07022.00

Matthew J. Fanoe
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. Fanoe:

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*

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*

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

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



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

LAND USE ALTERNATIVES

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.
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.
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?
4. In the analysis of 2030 conditions, what level of new development was assumed for the remainder of Bellevue, including Downtown specifically?
5. Was the full level of Microsoft's planned development included?
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.
7. The document refers to "higher density", but without any identification of where, how much, nor the resulting impact.

ANALYSIS of ALTERNATIVES

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?
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?
3. Will the FEIS evaluate one or more hybrid alternatives? If so, the effect of not having LRT should be evaluated.
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?

TRANSIT

1. The document focuses on AM transit ridership. Why not PM as with the roadway analysis?
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?
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)?
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?
5. On page 10-5, one of the assumptions for the East Link project is that it is "...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

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)?
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?
3. Sketches of the Alt. 1, 2, and 3 alternatives at Bel-Red/12^{4th} 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.
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.
5. What improvements to the I-405/SR-520 interchange were assumed for 2030?

EVALUATION OF TRANSPORTATION

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.
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?
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?
4. In addition to pedestrian trips, were other non-motorized trips quantified? If so, how and what were the results?
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,



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

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.

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.
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:

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.

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.

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.

SR 520 Connection at 124th Ave. NE. Meet noise, view and spill-over transportation protection requirements for Bridle Trails Subarea.

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.

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.

Impact of Utility Needs: Assess the impact on surrounding neighborhoods for additional substations, switching stations, transmission lines and other pertinent facilities.

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

To: Carol Helland

From: Bridle Trails Community Club

Re: Bel-Red Corridor Project/Draft EIS

Date: 12 March 2007

Dear Ms. Helland,

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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.

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transportation infrastructure needed to mitigate impacts on surrounding neighborhoods especially spillover traffic.

Impact of Utility Needs: Assess the impact on surrounding neighborhoods for additional substations, switching stations, transmission lines and other pertinent facilities.

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



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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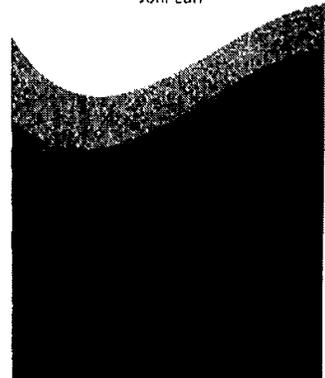
Ron Sims
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Lakerwood Mayor

Pete von Reichbauer
Vice Chair, King County Council

CHIEF EXECUTIVE OFFICER

Joni Earl



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 comdor. A map of the East Link EIS alternatives is attached.

General Comments

- "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".
- 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 comdor 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.
- 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.

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

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

- 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

- 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.

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

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

Air Qualify

- Page 3-18 "It should be noted that each alternative assumes a varied number of LRT alightings 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 16" 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

- 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

- 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.
- 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.
- 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.

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

- 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.

Transportation

- Page 10-5 2nd sentence – change “ST2 Plan” to “Draft ST2 Package”
- Page 10-5 Please include a figure showing BKR coded LRT lines
- Page 10-5 Include current transit assumptions in the network
- 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.
- Page 10-5, Regional transit network changes – The ST2 Draft Plan includes LRT from Lynwood 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.
- 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.
- Page 10-5, LRT East Link Project assumptions – The LRT 9003 line appears to be the same as the shortened LRT 7003 line.
- 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.”
- Page 10-16 3rd paragraph – “...traffic impacts would occur in the North Bellevue neighborhood...” change “North Bellevue” to “Bridle Trails.”
- Page 10-29 “These results are somewhat counterintuitive...” – “” Could you explain why, given the added capacity which results in reduced impact, are counter intuitive?”
- 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”.
- Page 10-37 1st paragraph – Change “early 2008” to “late 2008”
- Page 10-37 2nd paragraph – Change “156th Ave NE” to “152nd Ave NE”
- 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.

Carol Helland
March 12, 2007
Page Seven

- 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.
- 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.
- 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?

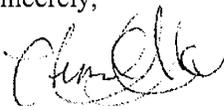
Public Services and Utilities

- 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,

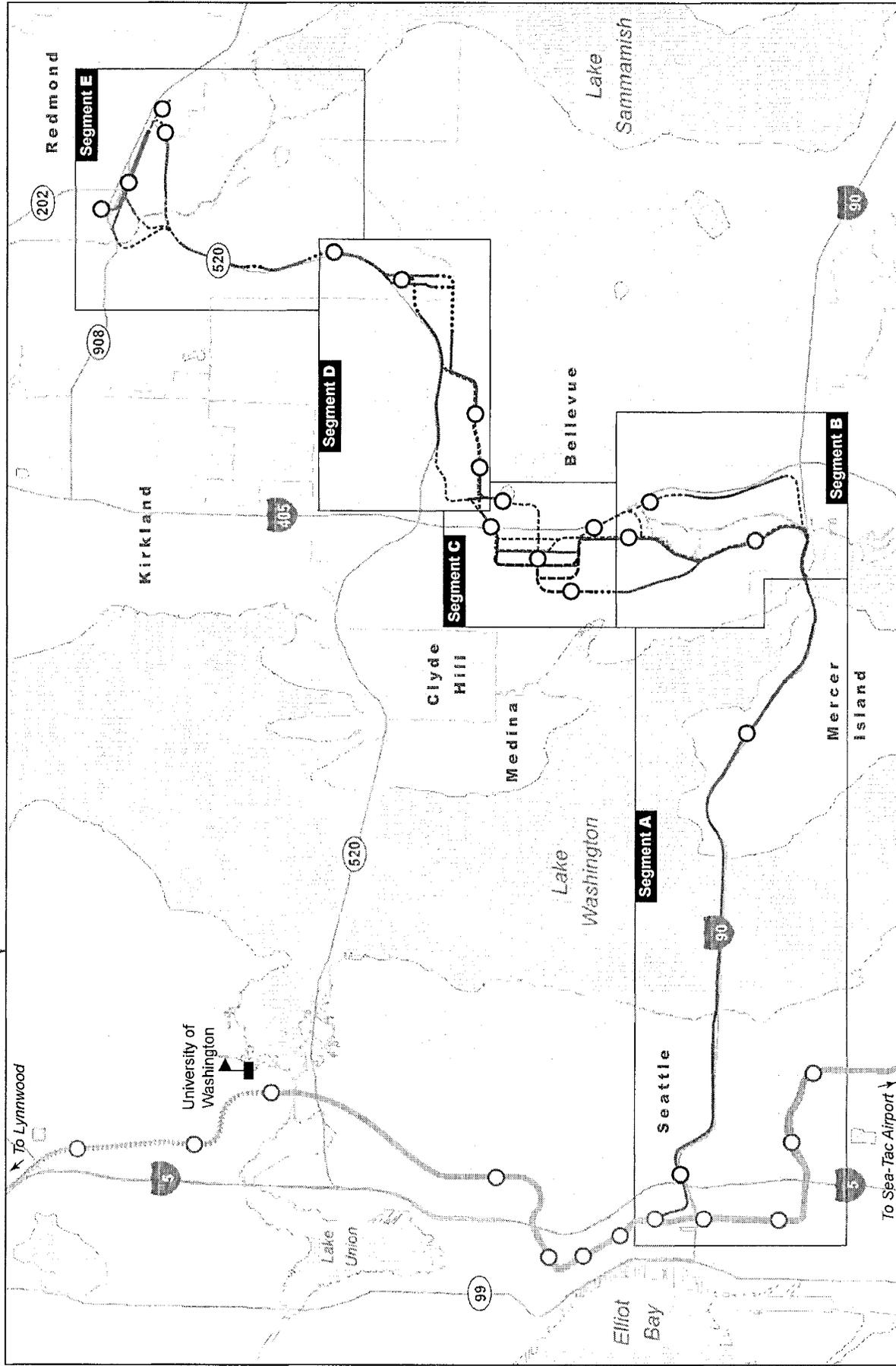


Leonard McGhee,
Bellevue-Redmond Segment Manager,
East Link Project

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



Shaping_Reports\Mapa\Figures_for_Eng\East_Link_Prog_Area_Alt_022107_0F

- City Limits
- East Link Light Rail Alternatives**
 - East Link Segment
 - Station
- Route Profile**
 - At-Grade
 - Elevated
 - Tunnel
 - Retained Cut
- Central Link Light Rail**
 - Central Link Alignment and Station
 - Central Link Extension

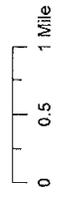


Exhibit: East Link Project Area Alternatives
East Link Project

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

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.

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.

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.

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

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

Helland, Carol

From: Koengeter, Maria
Sent: Monday, March 12, 2007 9:06 AM
To: BelRed
Cc: Helland, Carol; Benn, Jennifer; McDonald, Kevin
Subject: Title VI Bel-Red DEIS comment letter

Attachments: Title VI Bel-Red DEIS Comment Letter.doc

Please find attached a comment letter on the Bel-Red DEIS from the City's Transportation Title VI Coordinator. Jen will return to the office tomorrow to sign a hard copy of the letter for inclusion in the FEIS.



Title VI Bel-Red
DEIS Comment ...

Thank you.
Maria

Maria Koengeter
Senior Planner
Bellevue Transportation Department
425-452-4345



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

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

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; DEANREBHUHN@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; DEANREBHUHN@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

Helland, Carol

From: Shannon Boldizar [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; DEANREBHUHN@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



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.

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.

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

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

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.

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

c: Bellevue Chamber Board of Directors
Bellevue City Council
Steve Sarkozy, City of Bellevue
Matt Terry, City of Bellevue
Goran Sparrman, 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

Helland, Carol

From: Melody Forsythe [ForsM@foster.com]
Sent: Monday, March 12, 2007 4:24 PM
To: Helland, Carol
Cc: Tayloe Washburn; gjohnson@wrihtrunstad.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
FOSTER PEPPER PLLC
1111 Third Avenue, Suite 3400
Seattle, WA 98101-3299
Phone: 206-447-3868
Fax: 206-447-9700
forsm@foster.com
www.foster.com
Foster Pepper PLLC

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

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.

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:

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.*

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.

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.

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 be 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

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.

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:

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:

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.*

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

Discussion:

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:

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;*

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:

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:

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:

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:

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

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:

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:

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:

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

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.*

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.*

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.*

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.*

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

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

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:

- 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:

- ▶ 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

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.

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.

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.

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.

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.

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.

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

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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.

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 rezone, it is reasonable that a Level of Service standard reflective of a more urban condition be included as a policy recommendation in the FEIS.

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.

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.

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

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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.

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.

**WRIGHT
RUNSTAD
& COMPANY**

PRINCIPALS:
H. JON RUNSTAD
WALTER H. INGRAM
GREGORY K. JOHNSON

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

November 30, 2006

Mr. Michael Creighton
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

Mr. Michael Creighton
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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.

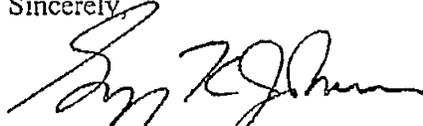
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In summary, we submit the following recommendations to the Bel-Red Steering Committee for its consideration:

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

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.

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 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.

³As 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 purposes².

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 sliver 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.



**BELLEVUE DOWNTOWN
ASSOCIATION**

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.

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.

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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BELLEVUE CHAMBER
Steve Sarkozy
CITY OF BELLEVUE
**Executive Committee*

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.

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.

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.

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

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

O'Neill, Kevin

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

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

City: Bellevue
Name: Devon Campbell
Address: 11034 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. Expecially 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

O'Neill, Kevin

From: fujinagas@msn.com
Date: Monday, March 12, 2007 10:03 PM
From: 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,

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

O'Neill, Kevin

From: bethkswanson@hotmail.com
Date: Monday, March 12, 2007 9:45 PM
To: BelRed
Subject: 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:

O'Neill, Kevin

From: keedmane@hotmail.com
Date: Monday, March 12, 2007 8:56 PM
Subject: BelRed
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 mulit use field like Grass Lawn park in Redmond or like the fields that are on the Microsoft campuses.

Zip: 98004

O'Neill, Kevin

From: dwalton44@yahoo.com
t: Monday, March 12, 2007 7:22 PM
Subject: BelRed
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

O'Neill, Kevin

From: Todd Woosley [todd@woosleyproperties.com]
Sent: 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 Boldizar; 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

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

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.

TRANSPORTATION/ECONOMIC FEASIBILITY:

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.

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.

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.

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.

MAKING EXISTING BUSINESSES NON-CONFORMING TO CHANGED ZONING CODES IS THE BIGGEST THREAT TO THE ECONOMIC VITALITY OF THE BEL-RED CORRIDOR.

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.

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.

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.

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.

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.

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.

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

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

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.

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:

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

Chapter 5 Noise:

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:

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.

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:

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.

Chapter 9: Aesthetics

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:

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"?

"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:

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.

Chapter 11: Public Services & Utilities

Impacts:

- 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.
- What is the impact to surrounding communities that rely on the same Police/Fire/EMR? Could delays result?
- 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?
- 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:

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

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.

O'Neill, Kevin

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

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, 140thAve, 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

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. Expecially 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 cosideration.

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

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, Renay Bennett, David Plummer, the Bridle Trails Community Club and Coca Cola.

Respectfully submitted,

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

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.

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

O'Neill, Kevin

From: bb517@scn.org
Subject: Monday, March 12, 2007 3:31 PM
BelRed
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

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.

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 protection, energy and resource conservation and transportation 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")

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.

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.

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.

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.

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.)

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.

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.

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.

Table 4-7, West Tributary. Alternative 2. I disagree with the comment that it would

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.

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.

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.

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 business 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

O'Neill, Kevin

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

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

City:
Name:
Address:

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 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:



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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

O'Neill, Kevin

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

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.

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.

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!

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.

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

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. 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 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.

My vote is for NO CHANGE!

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