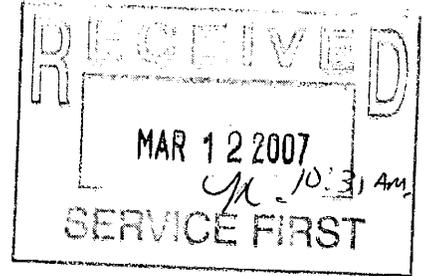


9 March 2007

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

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



Dear Ms. Helland:

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

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

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

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

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

Sincerely yours

*David F. Plummer*  
David F. Plummer

14414 NE 14th Place  
Bellevue, WA 98007-4001

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

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

### 1. GENERAL

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

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

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

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

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

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

Source: Bellevue Land Use Code 20.10.440

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

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

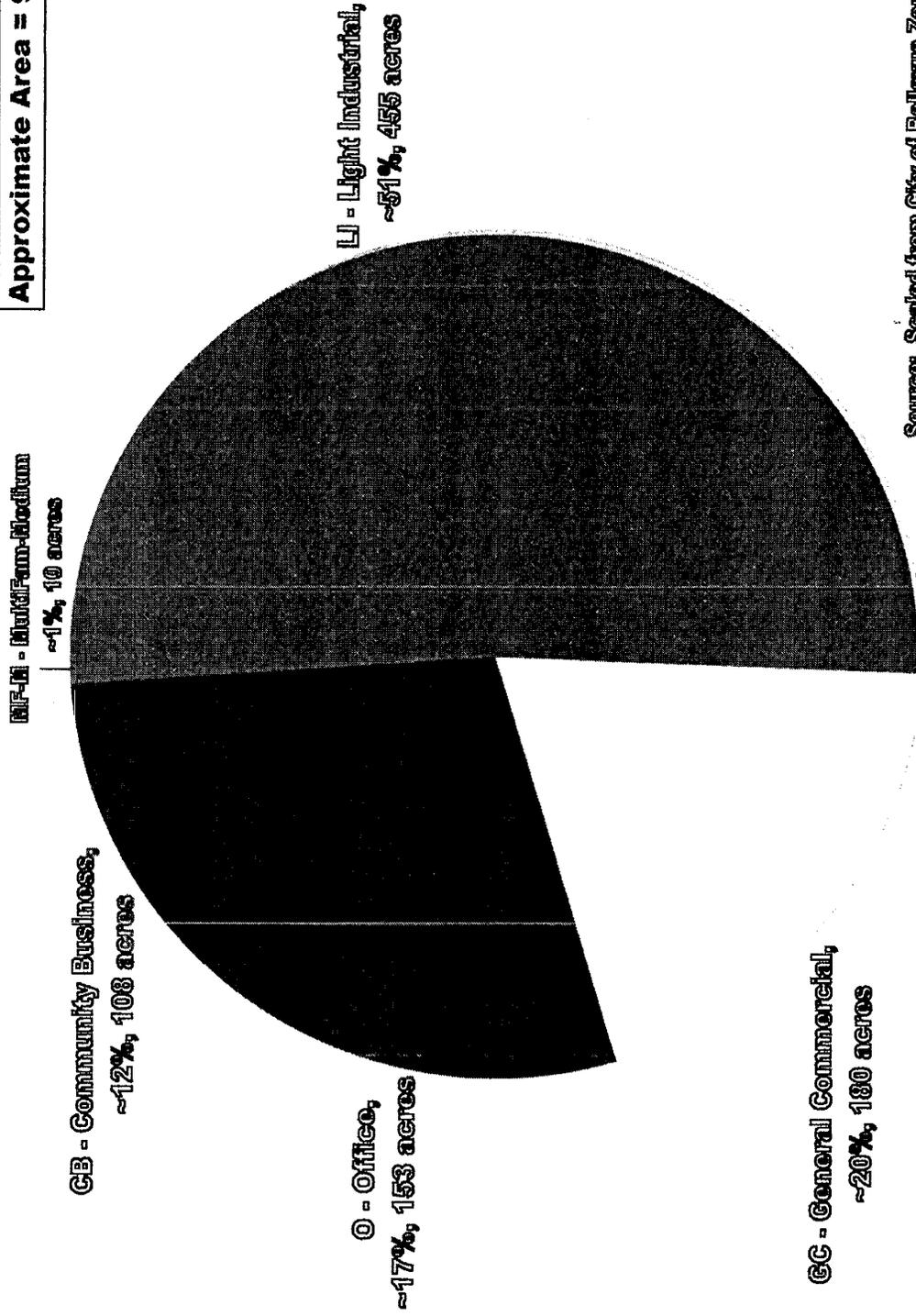
Zoning District		Number of Uses Allowed In Each District			
Name	Approximate % of Land Area	Permitted	Permitted as Subord. Use	Permitted as Cond. Use	Permitted as Adm. Cond. Use
LI- Light Ind.	51	59	5	18	3
GC- Gen. Comm.	20	55	11	18	2
O- Office	17	33	-	19	2
CB- Comm. Bus.	12	55	16	20	3
MF-M Multi-Family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

Approx. Total Area 900 acres

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

**Figure 1. Bel-Red Corridor Zoning**

**Approximate Area = 900 Acres**



**Source: Scaled from City of Bellevue Zoning Map dated 7 October 2005**

## 1.1, continued

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

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

In revising the 'no-action alternative' to improve its veracity, the revision should also clarify that Sound Transit's possible routing of an East-Link LRT line includes consideration of Sound Transit Alternative D5 (a route along BNSF/SR520 from downtown Bellevue to Overlake). Further, the assertion (page 1-8 of the DEIS) that LRT stations at Overlake Hospital and 152nd Avenue NE would not 'realize their full potential' is totally unsupported by any analysis; this statement should be deleted from the DEIS.

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

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

### 1.3, continued

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

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

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

The DEIS does not define or rationalize any specific *objectives* for the Bel-Red project; rather, there are a set of broad, but ill-defined "goals" established by the Bellevue City Council that were not subjected to any public review or input. Although the project has a Steering Committee, the Committee developed no procedures, and spent no time in effectively communicating with Bellevue citizens regarding possible changes in land use within the Bel-Red Corridor, even though, according to the City's operating guidelines for the Committee, they were supposed to "... solicit input from the general public and other key community stakeholders." In addition, there was no opportunity for public scrutiny or comment on the "goals" established by the City Council. Moreover, Committee membership was established in camera by the mayor and the deputy mayor, with no input from the other members of the City Council. Indeed, none of the Committee members live in reasonable proximity to the project area<sup>1</sup>, and since they did not seek input from the general public, especially homeowners in nearby residential

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

1.5, continued

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

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

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

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

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

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

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

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

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

Source:

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

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

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

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

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

Notes:

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

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

<b>Geocoded</b>		<b>Covered</b>		<b>Total</b>
		<b>Factor Set 1</b>	<b>Factor Set 2</b>	
<b>Year 2000</b>				
<b>PSRC CATEGORIES</b>	<b>JOBS00</b>			
Const/Res	2,291	Const/Res 1.080	2,474	Res/Con 1.283 3,175
FIRE	1,892	FIRE 1.053	1,993	FIRE 1.108 2,209
Manufacturing	2,272	Manufactur 1.014	2,304	Manuf 1.033 2,380
Retail	2,951	Retail 1.061	3,131	Retail 1.117 3,496
Services	14,320	Services 1.136	16,271	Services 1.145 18,637
WTU	2,989	WTU 1.075	3,212	WTU 1.118 3,591
Education	38	Education 1.000	37	Edu 1.000 37
Government	685	Government 1.010	691	Gov 1.000 691
<hr/>				
TOTAL	26,753		29,422	33,525
W/O Const/Res	24,462		26,948	30,350
<hr/>				
<b>Year 2004</b>				
<b>PSRC CATEGORIES</b>	<b>JOBS04</b>			
Const/Res	1,553	Const/Res 1.081	1,680	Res/Con 1.283 2,156
FIRE	1,931	FIRE 1.040	2,008	FIRE 1.108 2,226
Manufacturing	1,611	Manufactur 1.022	1,646	Manuf 1.033 1,700
Retail	2,375	Retail 1.030	2,446	Retail 1.117 2,731
Services	12,689	Services 1.094	13,881	Services 1.145 15,900
WTU	2,908	WTU 1.080	3,140	WTU 1.118 3,511
Education	38	Education 1.017	39	Edu 1.000 39
Government	802	Government 1.013	813	Gov 1.000 813
<hr/>				
TOTAL	23,907		24,840	28,263
W/O Const/Res	22,354		23,160	26,107
<hr/>				
<b>Year 2005</b>				
<b>PSRC CATEGORIES</b>	<b>JOBS05</b>			
Const/Res	1,748	Const/Res 1.081	1,890	Res/Con 1.283 2,426
FIRE	1,625	FIRE 1.040	1,690	FIRE 1.108 1,873
Manufacturing	1,772	Manufactur 1.022	1,811	Manuf 1.033 1,871
Retail	2,528	Retail 1.030	2,604	Retail 1.117 2,907
Services	12,723	Services 1.094	13,918	Services 1.145 15,942
WTU	2,792	WTU 1.080	3,015	WTU 1.118 3,371
Education	38	Education 1.017	39	Edu 1.000 39
Government	772	Government 1.013	782	Gov 1.000 782
<hr/>				
TOTAL	23,998		24,967	28,429
W/O Const/Res	22,250		23,077	26,003

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

1.7 (d), continued

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

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

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

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

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

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

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

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

## 1.7, continued

the many uses allowed in the Corridor by present zoning (see Tables 1 and 2, and Figure 1, above). The DEIS should be extensively revised to more accurately describe the limited amount of input the City received from citizens and business/property owners, and the limited, unsubstantiated, and unchallenged work done by City consultants. The DEIS should also disclose more accurately why the City is proposing to intensify the zoning in the Corridor; ***the reasons provided in the DEIS are totally inadequate to justify such an expensive, complex, and long-running study effort, or the extremely intense, very high cost alternatives.*** At the same time, the pejorative/incomplete characterization of normal 'evolutionary' developments that might occur in the Bel-Red/Northrup subarea (under the No-Action alternative) should be revised, as it tends to lead DEIS readers to conclude that such development would result in less desirable, less efficient outcomes than those favored by the City. ***If the City has specific data/analyses to show that its plan for the Bel-Red Corridor would be demonstrably better (in some sense) than allowing development to occur based on property-owner proposals in response to their perceptions of evolving market demands, this data/analysis should be added to the DEIS in the form of an extensive appendix. In addition, if the City believes that its zoning/planning procedures are not adequate to properly control evolutionary development of property-owner proposed developments in the Corridor, this should be disclosed in the DEIS so that citizens can better understand the City's rationale for the Project.***

## 2. COMMENTS SPECIFIC TO INDIVIDUAL CHAPTERS

### 2.0 Chapter 1

2.0.0 Table 1-3 (watershed processes) improperly states that water-quality and habitats under the No-Action Alternative would continue to degrade over time. Why would the City allow this to happen under this alternative since the City is committed to improving streams and fish habitat in the City's stream systems? ***The same opportunity for improving stormwater management and improving habitats will be present for the No-Action alternative as for the Action alternatives.***

2.0.1 The assertion in Table 1-3 (noise) that sound/noise levels near major arterials for all alternatives would be same is totally fallacious, and unsupported by information/analyses in Chapter 5 of the DEIS, as only three intersections were evaluated by predicted noise contour plots; and none of the noise contour plots are based on empirical measurements/data. Further, the noise evaluation failed to include impacts of Sound Transit's LRT line through the Corridor, or along SR-520. Also, the traffic analysis in Chapter 10 does not explain why the predicted PM 2-hour, bi-directional traffic counts on almost all roads is virtually identical among the 4 alternatives for 2030. In addition, if the predicted sound/noise levels are the same, why would some mitigation measures not be assumed for the No-Action alternative?

2.0.2 The assertion in Table 1-3 (environmental health) that there would be limited redevelopment under the No-Action alternative is incorrect: it is very likely that substantial redevelopment and property improvement would be

## 2.0.2, continued

proposed/accomplished by property owners if none of the Action alternatives are adopted. Indeed, many properties have been improved or redeveloped in the Corridor over the last several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9.

2.0.3 The assertion in Table 1-3 (land use) that future land uses under the No-Action alternative would not be compatible with the City Council's 'planning principles' for the Corridor is totally unsubstantiated by any analyses, data, or study reports. ***Rather, the No-Action alternative is almost wholly compliant with all ten of the City Council's 'planning principles' for the Corridor as shown in Table 5. Further, future proposals by property owners in the Corridor for rezones, and other land-use changes are to be expected under the No-Action proposal; this type of activity has occurred in many areas of the City in the past, and will undoubtedly continue into the future.***

2.0.4 The assertion in Table 1-3 (recreation) that there would be no additional recreational facilities in the Corridor is incorrect. There are number of parcels of undeveloped land in the Corridor, and a rather extensive stream system. Since the City is committed to protecting and enhancing its streams and habitat areas, it is likely that protective/enhancement measures for the stream system in the Corridor could be proposed by the City under the No-Action alternative, and could easily include open spaces with public access.

2.0.5 The information given in Table 1-3 (population, housing, and employment) is incorrect: data and analyses of the City of Bellevue and PSRC show that the Corridor's employment in 2004 was about 19,000; forecasted employment for 2030 is estimated to be about 35,000: see Tables E49-1 and E-49-2, above.

2.0.6 The summary of the traffic impacts given in Table 1-3 (transportation) is not credible: if the Action Alternatives add approximate 6300-8700 persons to the Corridor vis-à-vis essentially none under the No-Action alternative, how could the traffic average speeds, intersection LOS values for the Action Alternatives be in any way comparable? Also, the two LRT stations for the No-Action alternative are located at the west and east boundaries of the Corridor, not " ... in ... " the Corridor as stated in Table 1-3.

2.0.7 The impacts on public services and utilities (summarized in Table 1-3) are not adequately defined. Adding 6300-8700 residents (under the Action alternatives) to the Corridor will create ***significant*** demand for increased fire and police protection at considerable cost. Also, because of increased traffic congestion under the Action alternatives, emergency vehicle access (for fire, police, and other emergency responses), especially to nearby residential areas, would not be improved (vis-à-vis the No-Action alternative), and there is no analysis in the DEIS to show that this assertion is

**Table P9. Property Sales In Bellevue Area 80-050 and -060 (Overlake), and 80-70 (Midlakes), 2003-2006**

Area	Zoning	Sales in Year			
		2003	2004	2005	2006
80-050	O - Office		1	5	
	PO - Prof. Off.		3	1	
	GC - Gen. Com.	1	1	3	
	CB - Com. Bus.		1	2	
	LI - Lt. Ind.			1	
80-60	O - Office				
	PO - Prof. Off.				
	GC - Gen. Com.				
	CB - Com. Bus.				
	LI - Lt. Ind. R-20 Apt.		1		
80-70	O - Office	2	5	4	
	PO - Prof. Off.	1	2		
	GC - Gen. Com.		1	3	1
	CB - Com. Bus.				
	LI - Lt. Ind.	1	4		
Totals					
O - Office		2	6	9	
PO - Prof. Off.		1	5	1	
GC - Gen. Com.		1	2	6	1
CB - Com. Bus.			1	2	
LI - Lt. Ind. R-20 Apt.		1	4	1	
Total for Year		5	19	19	1

Source: King Count Assessor Report for Bellevue Area 80; King County; Seattle, WA. April, 2006

**Table 5. Compatibility of No-Action Alternative With City Council Planning Principles**

Principle No.	Description	No-Action Alternative Compatibility With Principle
1	Long- term vision; ambitious; realistic; clear direction	<b>Unknown:</b> business/property owners were never asked for their combined or individual visions; however, some business owners (e.g., Coca Cola, auto repair, etc.) expressed their intention to remain in the area under present zoning.
2	Economic vitality; solid and dynamic economic future	<b>Yes:</b> there are currently approximately 1600 businesses in the corridor; the wide variety of permitted uses under current zoning , and possible future changes insure a solid economic future.
3	Differentiated economic niche; provide for future growth of business activity not well accommodated in other parts of the City.	<b>Yes:</b> current zoning provides for wide diversity of service and other unique businesses, especially those in the light industrial area; possible future uses under present range of permitted uses, and possible rezones, imply a secure business and economic future with good employment growth prospects.
4	Build from existing business assets	<b>Yes:</b> there are currently approximately 1600 businesses in the corridor; with normal business and economic activity growth, and potential to exploit permitted uses under existing zoning, or thru rezone activity, the economic and business future of the Corridor is as secure as any other area of the City.
5	High-capacity transit opportunity	<b>Yes:</b> Sound Transit will consider an LRT route parallel to the corridor along SR520; this route is far cheaper than routes thru the interior of the Corridor, and will not consume valuable land that can be used for productive economic and business activity, thus generating more tax revenues and employment opportunities. Expected/future improvements in local bus service will provide adequate transit service at much lower cost. Criteria for LRT station location suggest that a station in the vicinity of 134th NE (for an SR520-parallel LRT route) could be constructed and would serve the Bel-Red Corridor and the Bridle Trails neighborhood to the north of SR520.
6	Land-use/transportation integration; should have good multi-mode transportation subsystem	<b>Yes:</b> with the expected, but not excessive improvements in the interior road network, LRT service parallel, and close to SR520, and stations at the west and east ends, and improved local bus service, the Corridor can efficiently provide employment growth opportunities. Expected upgrades in existing and limited future arterials to add sidewalks and bicycle lanes will ensure a viable transportation subsystem.

**Table 5. Compatibility of No-Action Alternative With City Council Planning Principles, continued**

Principle No.	Description	No-Action Alternative Compatibility With Principle
7	Community amenities and quality of life; protect existing resources and include new parks and open space	<i>Partially.</i> the existing community center and athletic field at Highland Center would be retained; with only a modest effort by the City, additional recreational and open space provisions could easily be incorporated; in addition, the City's commitment to stream and habitat protection and enhancement would assure that Corridor wetlands would be improved.
8	Protect nearby neighborhoods and provide for future new neighborhoods	<i>Partially.</i> lower intensity development will provide the best protection (vis-à-vis the Action Alternatives) to existing neighborhoods on the north and south boundaries of the Corridor; since the City's Buildable Lands Report shows that no new zoning is required to meet the City's 20-year growth vectors, no new neighborhoods are required in the Corridor.
9	Sustainability; manage corridor natural resources in sensitive, sustainable manner; conserve energy and natural resources	<i>Yes.</i> the No-Action alternative is the least intensive, with lowest burden on energy and natural resources; preserves maximum flexibility for City small-scale initiatives; minimizes impact to surrounding neighborhoods; provides widest diversity of economic/business activity for an enhanced, broad range of new employment opportunities; and is the alternative most compatible with City's commitment to concentrate employment and population growth in the Downtown Subarea.
10	Coordination; coordinate with other affected jurisdictions, Sound Transit, City of Redmond	<i>Yes:</i> this 'principle' was directed at the activities of the Bel-Red Project steering committee. Thus, all of the alternatives would normally be coordinated with nearby cities, with Sound Transit, King County, etc.

## 2.0.7, continued

correct. Also, because of increased traffic congestion on nearby arterials, emergency response to nearby neighborhoods (Rockwood, Bridal Trails, etc., would deteriorate; this deterioration was not analyzed in the DEIS.

2.0.8 There is no analysis or other data or references in the DEIS to confirm the assertion in Table 1-3 (public services and utilities) that increased demand for electric power/energy, natural gas, and other utility services under the Action Alternatives would not result in significant demands for capacity increases from Puget Sound Energy. Similarly, there is no conclusive analysis that confirms that there would not be significant demand for increased capacity for water, waste water, or solid-waste disposal from these service providers under the Action alternatives.

## 2.1 Chapter 2

2.1.0 On page 2-1, the City/DEIS asserts that the "... City of Bellevue staff and consultant team developed the action alternatives for the Bel-Red Corridor Project through a structured process ... ", including analysis of market conditions, and sought input from the public and property/business owners. These assertions far overstate the amount of analysis and degree of input from the public and business/property owners. In fact, the analyses done by the City's three principal consultants were superficial, and heavily influenced by the staff's biased commitment to intensify the land-use and zoning in the Corridor; this can be clearly seen in the statements of work for the City's three principal consultants (available from the City of Bellevue through their public-records-request procedures).

During the process of revealing the City's pre-conceived notions for redevelopment of the Corridor through public meetings and the Bel-Red Steering Committee meetings, only limited input was obtained from the public: see Table M4. In addition, the Steering Committee only allowed public comments (usually at the end of their meetings), and only allowed speakers a 3-minute 'window' for their comments.

Leland Consultants was required to meet with "stakeholders and others ...", and with Sound Transit to obtain information on plans, opportunities, and constraints on redevelopment in the Corridor. In fact, Leland interviewed or contacted by telephone, only 41 persons in response to this requirement (see Table L56); it is not known whether Leland met with representatives of Sound Transit. However, the City estimates that there are approximately 1500 businesses in the Corridor, so Leland only contacted less than 3% of the business owners. In the 1 August 2005 briefing to the City Council on the project, the City's Planning & Community Development Director told the Council that prospective 'stakeholders' included not only current land owners and tenants in the area, but also "**(r)esidents and residential property owners within and adjacent to the subarea, (i)ncluding all community and neighborhood associations.**" This same representation was made to the City's Transportation Commission on 1 September 2005. However, LCG did not interview any residents or community/neighborhood associations. Thus community/neighborhood associations in nearby areas were prevented from making their views known to the City's consultant, and, subsequently, to the Committee.

Leland made no contact with individual property owners in the various residential neighborhoods surrounding the Corridor, nor did they meet with any of the City's neighborhood associations. And the staff made no serious effort to contact individual citizens or homeowner

**Table M4. "Public" Involvement In Bel-Red Corridor Project**

Meeting Date	Type of Meeting/Other	Est. No. of 'Pub.' Attendees	No. of Public Comments	Comments
8-Aug-05	Interview via telephone or in meeting	40	0	Interviews of so-called "stakeholders" by Leland Consulting Group prior to start of Project
27-Oct-05	Steer. Comm.	5-10 (?)	0	
9-Nov-05	Public Workshop (EIS Scoping Mtg)	25-40 (?)	N/A	Attendees were organized into small groups and responded to scripted questions from Staff; no opportunity for public comments to entire group.
1-Dec-05	Steer. Comm.	10-15 (?)	1	
19-Jan-06	Steer. Comm.	10-15 (?)	1	
2-Feb-06	Steer. Comm.	10-15 (?)	2	
2-Mar-06	Steer. Comm.	10-15 (?)	4	
6-Apr-06	Steer. Comm.	10-15(?)	7	
18-Apr-06	Open House	25-30 (?)	0	Attendees wandered around room and made comments to staff.
4-May-06	Steer. Comm.	10-15(?)	0	Special meeting of Steer. Comm. for business and property owners
16-May-06	Series of 4 Bus. & Prop Owner Panels	3-5(?)	0	Public could attend, but not participate or comment.
1-Jun-06	Steer. Comm.	15-20(?)	3	No 'map' of no-action alternate.
6-Jun-06	Series of 3 Bus. & Prop. Owner Panels	3-5(?)	0	Public could attend, but not participate or comment.
8-Jun-06	Public Meeting	40-60 (?)	32 Questions	Written comments ??
12-Jun-06	Steer. Comm.	10-12(?)	0	No public comments permitted

Source: Meeting minutes for number of comments; attendance estimated.

**Table L56. List of Persons Interviewed at "Stakeholder Discussions,"  
Bellevue Doubletree Inn, 18 August 2005**

First Name	Last Name	Organization	Address	City
TJ	Woosley	Hal Woosley Properties	12001 NE 12th	Bellevue
Scott	Coombs	Harsch Investm't Properties	13010 NE 20th St	Bellevue
David	Schooler	SRO	600 106th Ave NE # 200	Bellevue
Janet	Donelson	Overlake Hospital	1035 116th NE	Bellevue
Pete	Hollomon	CB Richard Ellis	110 110th NE	Bellevue
Mark	Rowe	Opus NW	118th Ave. SE, Ste 300	Bellevue
Scott	Evans	Evans Company	1457 130th NE	Bellevue
Jorge	Gonzalez	Barrier Motors	14600 NE 24th	Bellevue
Michael	O'Brien	Lexus of Bellevue	11058 Main St.	Bellevue
Greg	Pardee	Acura of Bellevue	13424 NE 20th.	Bellevue
Elizabeth	Stoner	Overlake Fashion Plaza	2130 148th NE	Redmond
Don	Pickens	Sherwood Shopping Ctr.	NE 20th&156th	Bellevue
Tomis	Moriguchi	Uwajimaya	NE 24th St. &	Bellevue
Fred	Reininger	First Mutual Bank	400 108th NE	Bellevue
Jeff	Seely	ShareBuilder Corporation	1445 120th NE	Bellevue
Lane	Staples	Unigard Insurance Group	15805 NE 24th	Bellevue
Larry	Delfiner	Lexis-Nexis	13427 NE 16th Stree	Bellevue
Stacy	Graven	Meydenbauer Center	11100 NE 6th St	Bellevue
Robert	Fellows	King County Metro	?	Seattle (?)
Keri	Stout	Bellevue Family YMCA	14230 Bel-Red	Bellevue
Richard	Leider	Bellevue Downtown Assoc.	500 108th Ave NE # 210	Bellevue
Dave	Sharp	Legacy Commercial	400 112th NE	Bellevue
Walter A.	Scott	Legacy Commercial	400 112th NE	Bellevue
Kenneth D.	Graham	Overlake Hospital	1035 116th Ave NE	Bellevue
John	McPeak	Unigard Insurance Group	15805 NE 24th	Bellevue
Leslie	Lloyd	Bellevue Downtown Assoc.	500 108th Ave NE # 210	Bellevue
James	Barrier	Barrier Motor Group	14600 NE 24th	Bellevue
Helen	Russell	Barrier Motors	14600 NE 24th	Bellevue
Jerry	Sharkey	Lexis-Nexis	13427 NE 16th	Bellevue
Robert	Currey-Wilson	Fred Meyer	2041 148th NE	Bellevue
Roger	Hansen	Sound Transit		Seattle
Craig	Suhrbien	SUHRCO Management	10655 NE 4th St	Bellevue
Thomas	Harrold	Coca-Cola	Bel-Red & 120th NE	Bellevue
Eric	Nichols	Nickols Realty	14341 NE 21st St # E	Bellevue
Josephine	Tamayo-Murray	Catholic Comm. Services	12828 Northup Way # 100	Bellevue
Dan	Lassiter	Highland Community Ctr.	Bel-Red & 142nd NE	Bellevue
Terry	Wirth	Colliers International	10900 NE 4th	Bellevue
Beth	Quartarolo	Hewlett Packard	3380 146th PL SE	Bellevue
Scott	Evans	Evans Company	1457 130th NE	Bellevue
Joan	Wallace	Wallace Properties	330 112th NE	Bellevue
Beth	Quartarolo	Hewlett Packard	3380 146th PL SE	Bellevue
Terry	Pollard	Bellevue Family YMCA	Bel-RD & 142ndNE	Bellevue

Source: List of names and organizations provided by Leland Consulting Group to City; addresses added by author.

Notes: 1. Some of the individuals listed did not attend the interview session at the Doubletree Inn and were contacted by telephone.

## 2.1.0, continued

associations in preparing alternative development concepts for the Bel-Red Corridor. According to one of the staff's project leaders, the City sent a notice (in May 2006, staff does not remember the date) to 23 of the City's 77 home-owner/neighborhood associations offering to make some sort of presentation to them on the project. Apparently, there was no response to the City's offer, no surprise since 6 of the associations are inactive, only 1 of the associations was within the Corridor, and only 3 or 4 are reasonably close to the Corridor; there was no follow-up by the staff to solicit input from the associations. ***More important, there was no effort to organize any panels of lay citizens and/or homeowner associations comparable to those organized for the area's property and business owners.*** In addition, the committee's guidelines require the committee to " ... solicit input from the general public and other key community stakeholders..", ***but the committee has done nothing to discharge this responsibility.***

The City staff conducted a series of property owner panels during May and June 2006. However, as can be seen in Table M5, only a limited number of property owners participated.

***Thus, it is clear that there has not been broad citizen or business/property-owner participation in developing the Action Alternatives in the DEIS. Rather, these alternatives have been almost exclusively developed by the City staff and the City's consultants.***

2.1.1 On page 2-1 of the DEIS, the assertion is made that because of increasing land values, manufacturing and warehouse uses have become less economically viable, and therefore, the No Action alternative would " ... likely result in economic stagnation in the Corridor." ***This bald assertion is totally unsupported by any documented analysis, and is contrary to any reasonable recognition of the normal evolutionary, market-driven changes to land use, zoning, and property values that would be expected under the No Action alternative. Corridor property owners would, absent the City's grandiose and unjustified plan for the Corridor, respond to future market forces in an informed manner, based on their evaluations of temporal shifts in local and regional markets. Their responses would result in a variety of outcomes: sales of property, redevelopment of holdings, petitions for rezoning, and other outcomes that may or may not coincide with the City's ideas for development of the Corridor. These outcomes would in no way lead to 'economic stagnation,' and would undoubtedly result in greater gains to the property owners and the public than would flow under the City's redevelopment scheme.***

2.1.2 On page 2-1, the City/DEIS asserts that, among other things, the " ... land (in the corridor) is underdeveloped ... and land values have risen significantly in recent years." These assertions are incorrect, and apparently were based on the very limited analysis of the existing building and land conditions in the Bel-Red Corridor performed by Leland Consulting Group. This analysis was largely a 'back-of-the-envelope' snapshot, with little or no recourse to any sort of hedonic or other more comprehensive analyses of past or possible future market demand. Lacking such an analysis, Leland's 'market forecast' is nothing more than an opinion. ***Further, there was no analysis or forecast of future market demand by any other consultant.*** Contrary to the assertion in the DEIS (page 2-1), Leland's 'analysis' in no way demonstrates that property or land in the Corridor is underdeveloped; indeed, as confirmed by King County's Department of Assessment property records, and their report for Bellevue Area

**Table M5. Major Landowners In Bel-Red Corridor  
and Participation in Owners Panels**

Landowner	Acreage Owned	Percent of Total Bel-Red	Participated in Owner Panels	Remarks
Safeway	74.3	8.3	1 Panel	See Note 4.
Barrier Motors	45.6	5.1	No	
City of Bellevue	26.3	2.9	No	
King County	25.3	2.8	No	
Coca Cola	20.2	2.2	3 Panels	
Brenner Const.	13.2	1.5	No	
Shurgard	12.4	1.4	No	
Fred Meyer	12.1	1.3	No	
Regency Tower Corp.	11.7	1.3	No	
NE 20th St. Propert.	10.7	1.2	No	
F-MAC Highland Pk.	10.4	1.2	No	
Willamette Industries	10.3	1.1	No	
C/O Eproperty Tax, Inc	10.2	1.1	No	
Cadman	9.5	1.1	1 Panel	
JSH Properties	9.4	1	No	
Lowe's	8.5	1	No	
Sternoff	8.5	1	2 Panels	
Robertson Developm't	6.8	0.8	No	
Evergreen Center	6.4	0.7	3 Panels	
Mayer's Group	6.2	0.7	No	
<b>Total</b>	<b>338</b>	<b>37.7</b>		

- Notes: 1. Percentages assume Bel-Red Corridor is approximately 900 acres.  
 2. Percentages calculated.  
 3. Total number of businesses in Bel-Red Corridor: 1546  
 4. City of Bellevue staff directed all panels, but did not provide inputs as a property owner.

Source: List of landowners and acreage: Table 1 from Leland Consulting Group report to City, dated 25 October 2005.  
 Landowner participation taken from City of Bellevue meeting minutes, various dates.  
 Total number of businesses in Corridor from City of Bellevue memo to Steering Committee, dated 24 Feb 06

## 2.1.2, continued

80 (dated March 2006), land values in Areas 80-50, -60 (Overlake), and -70 (Midlakes) have remained fairly stable, and assessed values for land and improvements for 2006 show a very close correlation to sales prices.

As can be seen in Table 7, and Figures 6.1, 6.2, 6.3, and 8.1, 8.2, and 8.3, improvement ratios, assessed land values, and assessed unit land values in the Corridor have not, with few exceptions, shown any significant changes over the recent past, nor have they exhibited any significant departure from the behavior of similar properties in various areas of the King County. The erroneous information on these statistical parameters in the DEIS should be corrected with a much broader/comprehensive analysis, and a more meaningful statistical analysis by competent organizations, for example, the University of Washington's **Center for Community Development and Real Estate**, keeping in mind that this Center received a pledge from Jon and Judy Runstad for \$1 million, and that the mission of Runstad's firm is, surprise, REAL ESTATE DEVELOPMENT. In any event, it is necessary to obtain some more objective analyses on this issue to replace the blatant bias in the Leland report. Some references are listed in Table X; these references can provide some guidance on how to organize a more informed analysis of speculative land prices.

In addition to the errors noted above, Leland's (and the DEIS's) evaluation (page 2-2 of the DEIS) suggests that the "market conditions analysis" (the conditions are not defined, either in quantitative or dynamic temporal terms, i.e., how market demand for space or use may fluctuate over time in response to changes in exogenous variables - economic conditions, etc.) identified the potential through 2030 for 2.5-3.9 million square feet of office space, 200-400 thousand square feet of added office space, 2500-5000 residential units, and 200-300 hotel rooms.

Regarding Leland's and the DEIS's forecast of office space demand, Leland estimates office absorption of about 100-150 thousand sq.ft. per year from 2000 to 2020 (it is not clear why Leland back-casted his prediction to a starting point 6 years in the past), and 90-135 thousand sq.ft. per year for 2020-2030; no estimates of statistical or temporal variability are given by Leland or the DEIS. The basis or methodology for Leland's forecast is not explained in their report, nor in the DEIS. In addition, there is no reference to office adsorption rates in any other comparable areas. For example, the mean office absorption in the Seattle CBD from 1990 through 2005 was 305,575 sq. ft. per year, with a variance of plus or minus 665,440 sq. ft. per year<sup>2</sup>. While the Seattle CBD office market may not be directly comparable to the Bel-Red Corridor market, the reference report provides a much better view of the type of analysis needed before a decision is made to rezone the Bel-Red Corridor based on an incomplete, and unsubstantiated report such as the Leland report.

Regarding the forecast of demand for retail floor area, the projected retail floor area "demand" (Table 7 of Leland's report) is derived from a tabulation of PSRC population forecasts for 8 FAZs (forecast analysis zones), only two of which are directly applicable to the Corridor. Leland's report states that the 8 zones encompass an area with a 3-mile radius centered at approximately the Bel-Red Road and 130th NE, with the Bel-Red corridor expected to capture

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<sup>2</sup> Reference: Gibbons, A., and M. Gottlieb, "Seattle Central Business District Office Report 2006." Prepared for the Downtown Seattle Association; sponsored by a City of Seattle Office of Economic Development Grant; Seattle, 2006.

**Table 7. Average Improvement Ratios for Selected Properties,  
Bell-Red Corridor**

Parcel No. (Note 6.)	Year 2007 Imp. Ratio Lnd@Ass.Val.	Year 2007 Imp. Ratio, Land@\$15/Ft	Avg. Impovm't Ratio for 1991-2007	See Note:	Zoning	Land Area, Acres	Year 2007 Land Assesed Value, \$/sq ft.
9010	0.6026	0.6322	0.4252	1	CB	10.17	\$17
9240	Vacant	Vacant	N/A	-	LI	3.32	\$14
0100	0.3479	0.2991	0.3795	2	LI	60.43	\$12
9007	0.3759	0.3252	0.4380	2	LI	8.14	\$12
9048	0.2669	0.2536	0.4151	3	LI	20.16	\$14
9003	0.7212	0.6915	0.7354	2	LI	3.16	\$13
9087	0.6992	0.6683	0.6265	2	LI	2.89	\$13
9091	0.4359	0.3820	0.4857	4	LI	1.22	\$12
9027	0.6129	0.5964	0.5173	5	LI	1.54	\$14
9063	0.5657	0.6227	0.4860	2	GC	2.01	\$19
9179	0.5762	0.5593	0.5736	2	LI	1.13	\$14
9191	0.6080	0.5914	0.4604	2	LI	1.63	\$14
9297	Vacant	Vacant	N/A	-	LI	4.12	\$20
0009	Park Lot	Vacant	N/A	-	GC	0.63	\$42
9190	0.5281	0.5863	0.5423	2	LI	1.07	\$19
9204	0.6200	0.6036	0.6709	2	LI	3.23	\$14
9066	0.3162	0.3694	0.2734	2	LI	1.09	\$19
9296	Wet Land	Wet Land	N/A	-	LI	7.14	\$13
9295	0.1795	0.1489	0.2196	4	LI	8.43	\$12
9026	0.2146	0.2032	0.2868	4	LI	16.47	\$14
0191	0.8598	0.8307	0.8456	2	GC	2.69	\$12
Averages	0.5018	0.4920	0.4930				\$17

Source: 1. King County Assessor 2007 records for individual parcels for zoning, and land areas.  
2. Improvement ratios and unit land assessed values, calculated from Assessor data.

Notes:

1. Average IR value for 1994-2007.
2. Average IR value for 1996-2007.
3. Average IR value for 1995-2007.
4. Average IR value for 1991-2007.
5. Average IR value for 1992-2007.
6. See Figures 6-1, 6-2, and 6-3 for name of parcel and assessed land/improvement values.

Figure 6.1. Improvement Ratios for Selected Properties, 1994-2007

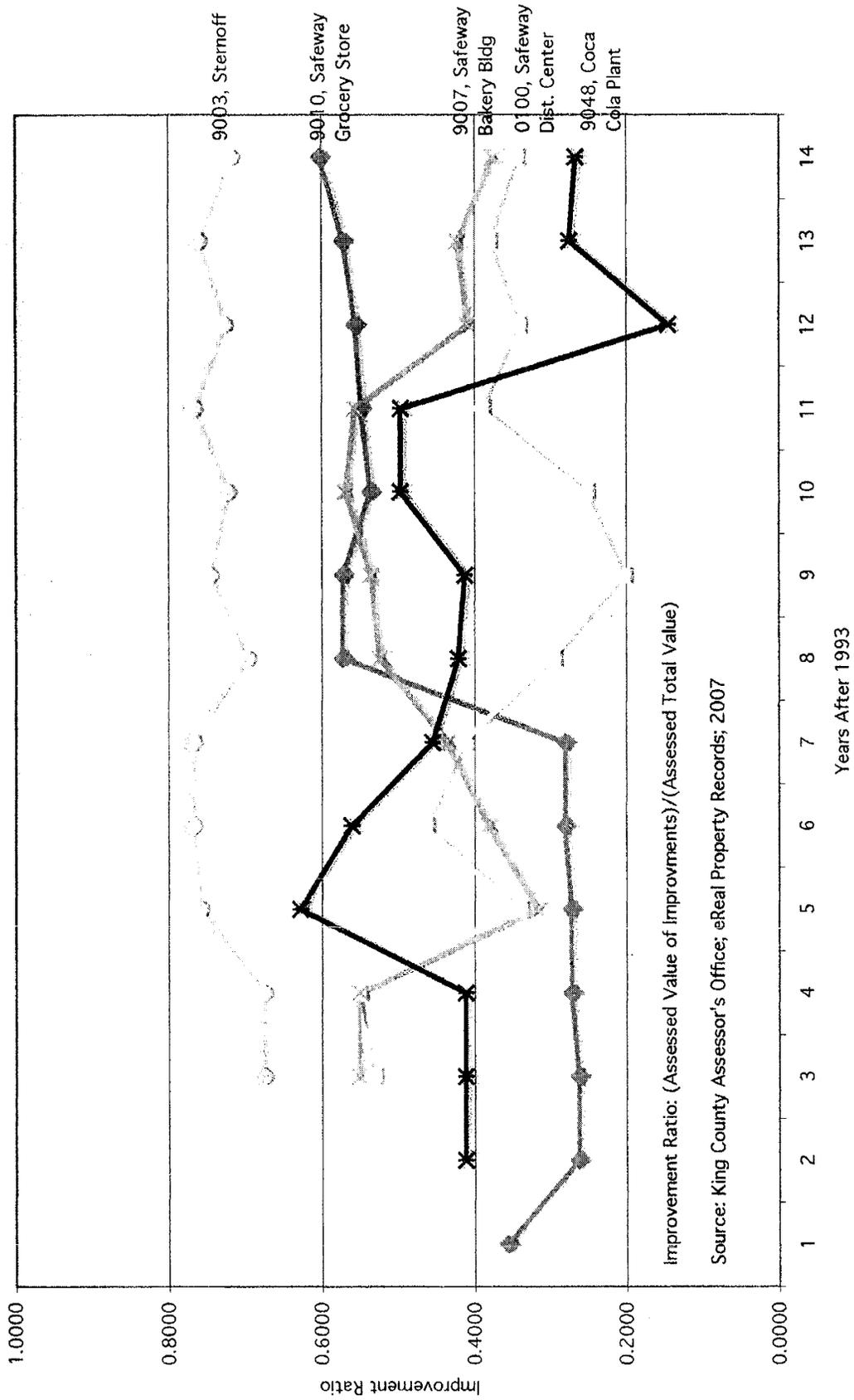


Figure 6.2. Improvement Ratios for Selected properties, 1991-2007

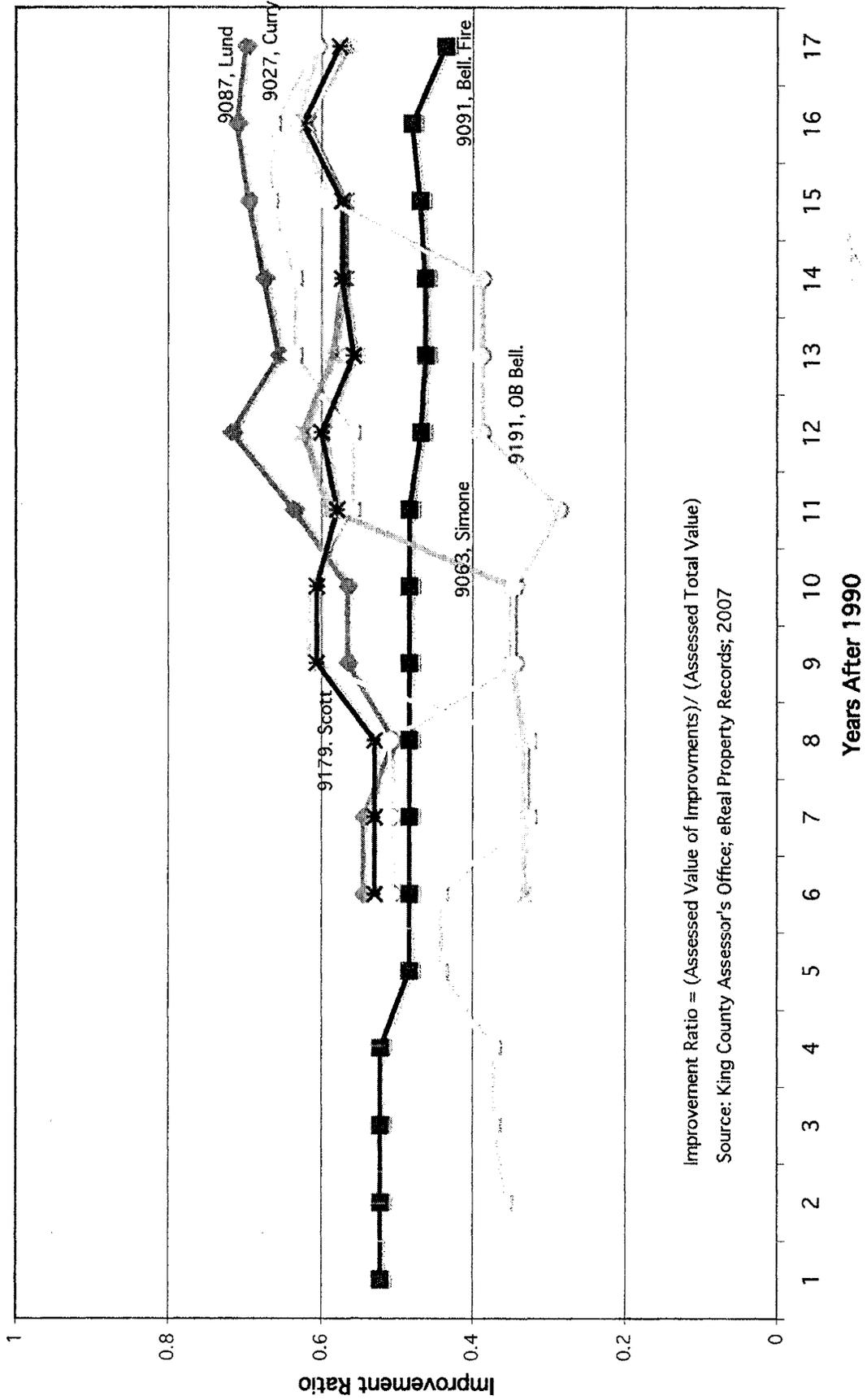


Figure 6.3. Assessed Land Values, Selected Properties, 1991-2007

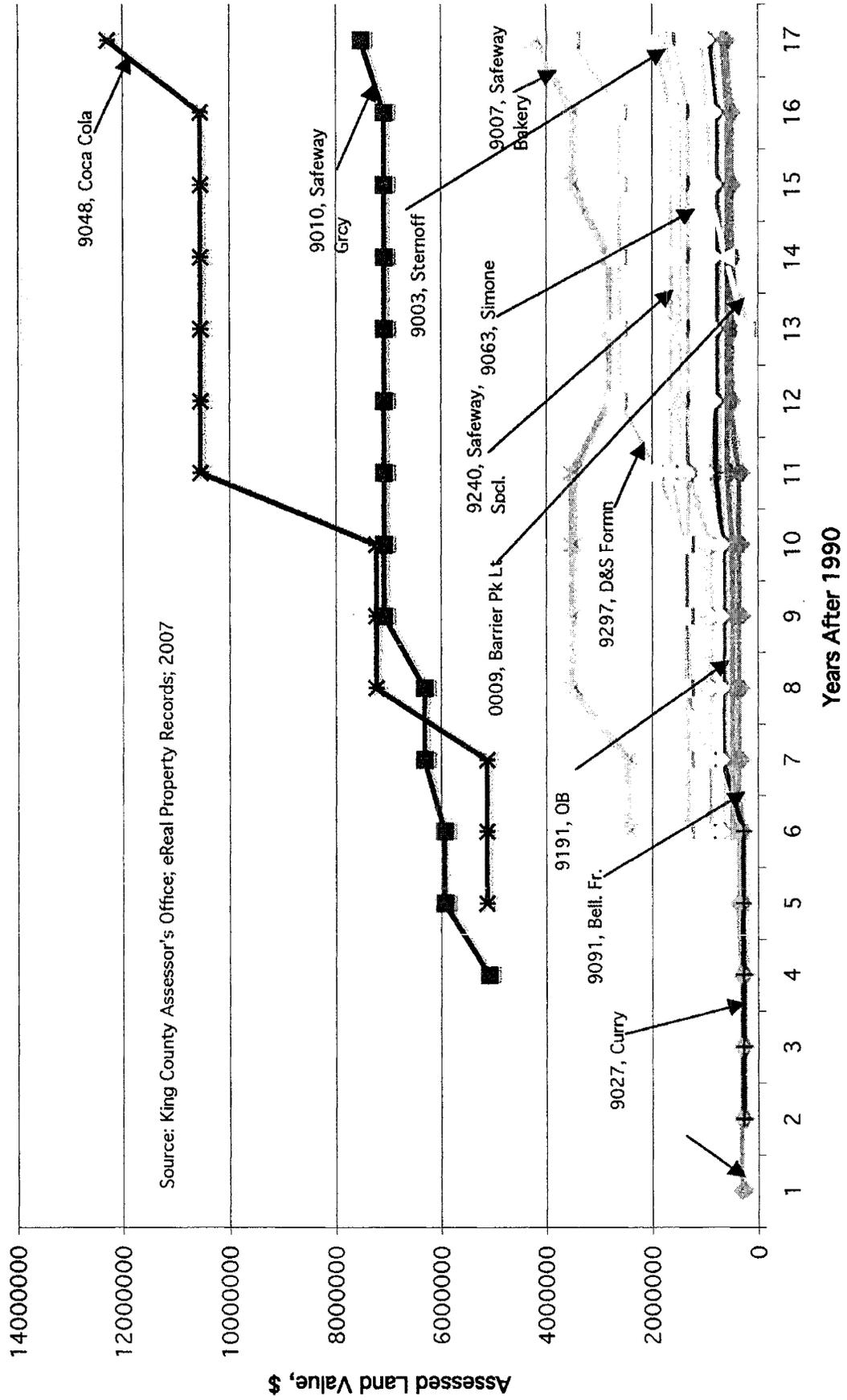
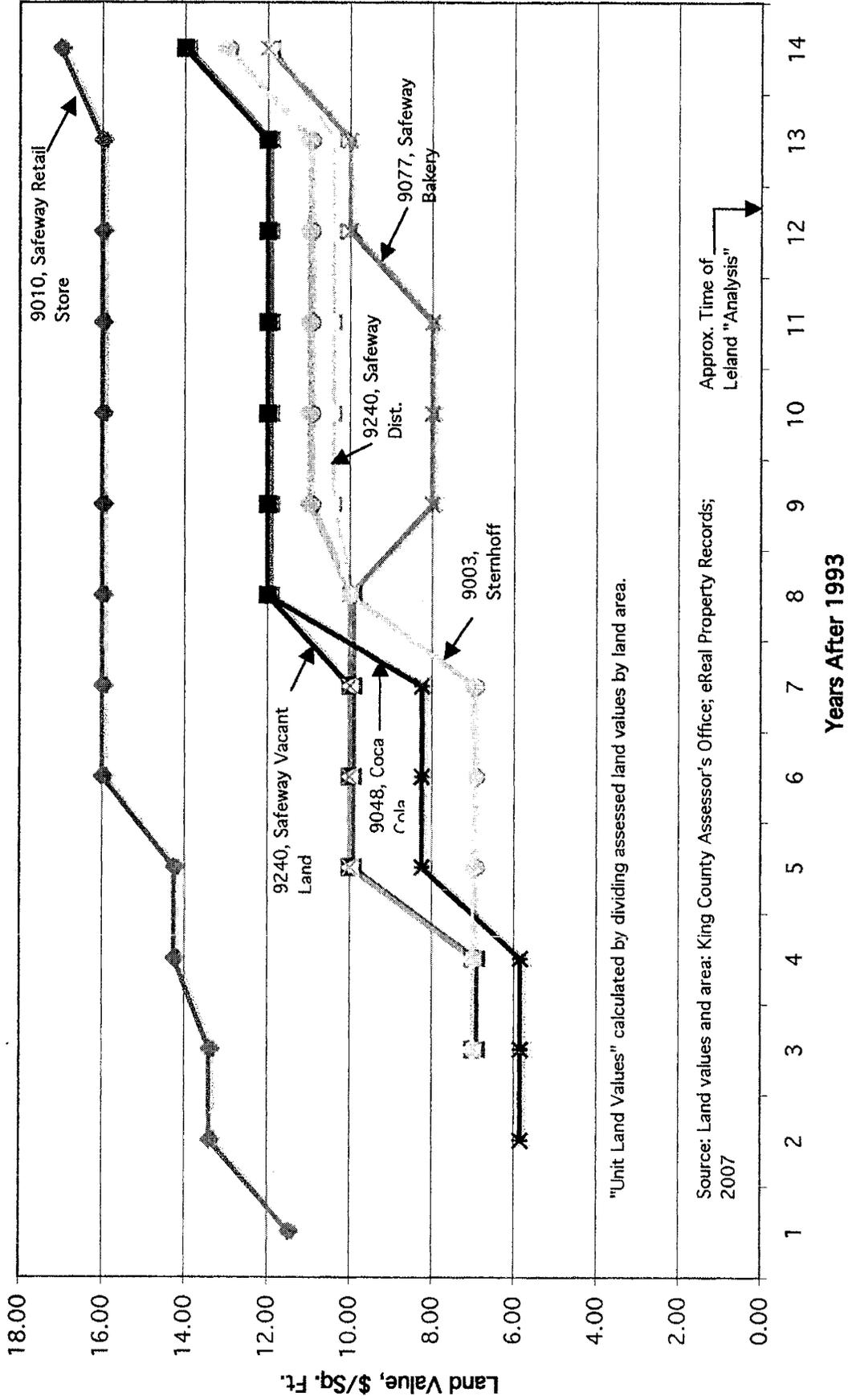
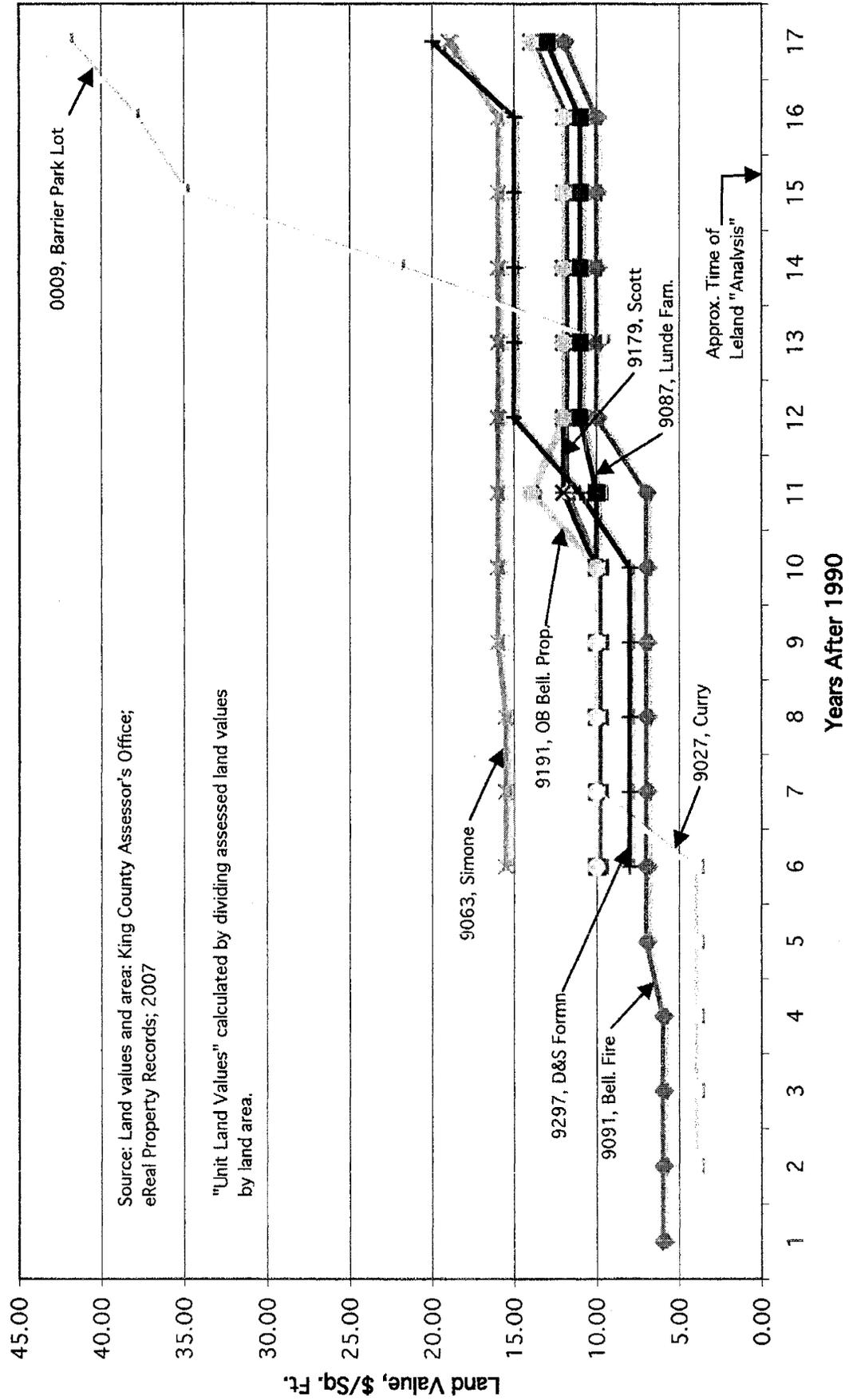


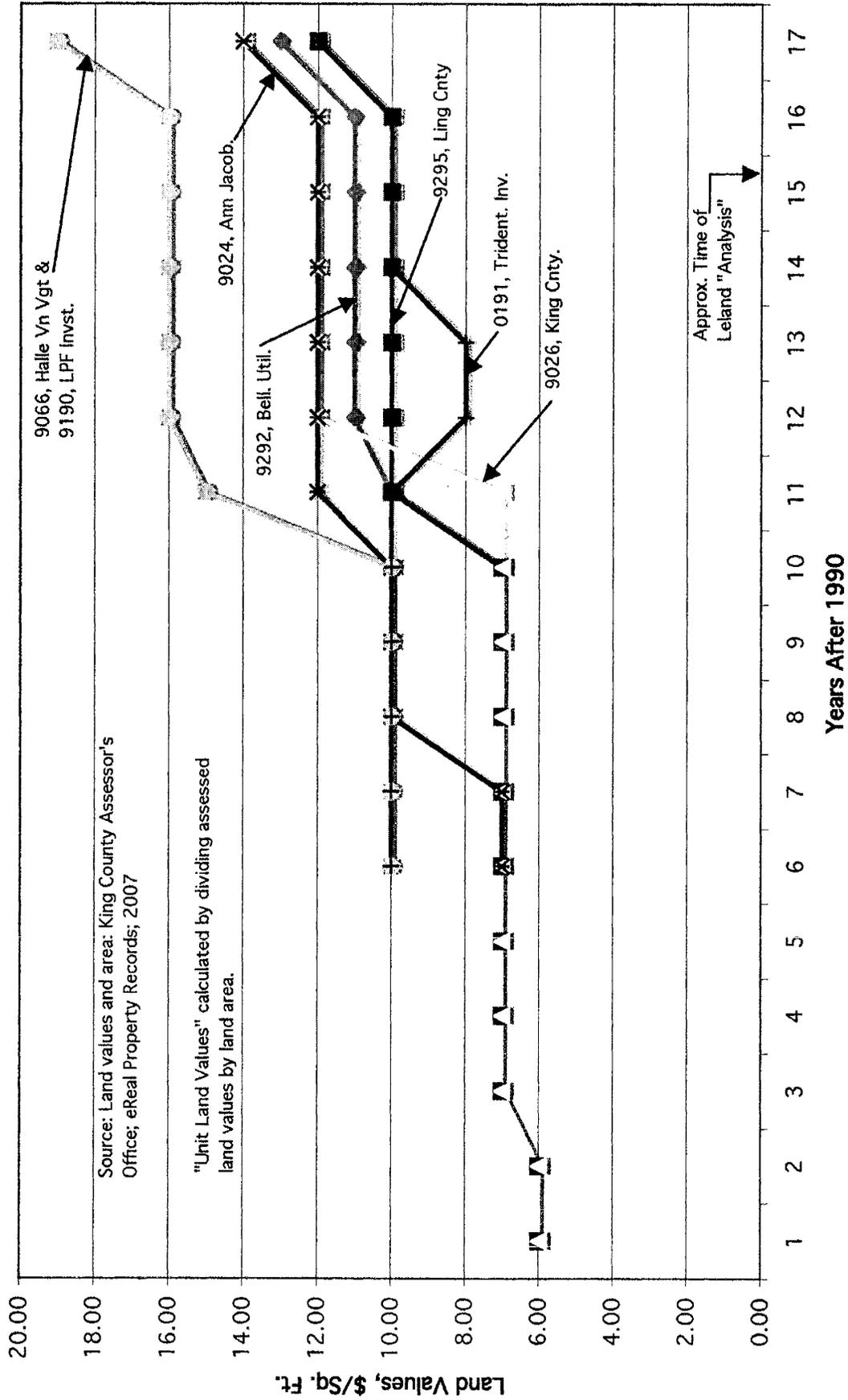
Figure 8.1. Assessed Unit Land Values, Selected properties, 1994-2007



**Figure 8.2. Assessed Unit Land Values, Selected properties, 1994-2007**



**Figure 8.3. Assessed Unit Land Values, Selected Properties, 1991-2007**



**Table X. References for evaluating speculative land use values under conditions of changing land-use and zoning**

1. Haurin, Donald R. "US Commercial Real Estate Indices: Transaction-Based and Constant-Liquidity Indices." BIS Papers No. 21, Real Estate Indicators and Financial Stability. Proceedings of a joint conference organized by BIS and the IMF. Washington DC, 27-28 October 2003.
2. Jud, G. Donald. "Price Indexes for Commercial and Office Properties: An Application of the Assessed Value Method." Journal of Real Estate Portfolio Management; American Real Estate Society; College of Business and Economics; California State Fullerton; Fullerton, CA. 1999.
3. Rosen, Sherwin. "Hedonic Prices and Implicit Markets: Product Differentiation in Pure Competition." The Journal of Political Economy, Vol. 82, No. 1, Jan.-Feb., 1974, pp. 34-55.
4. Shonkwiler, J.E., and J.E. Reynolds. "A Note on the Use of Hedonic Price Models in the Analysis of Land Prices at the Urban Fringe." Land Economics, Vol. 62, No.1, Feb. 1986, pp. 58-63.
5. Wheaton, William C. Urban Economics and Real Estate Markets. Prentice Hall. Upper Saddle River, NJ. 1995.

### 2.1.2, continued

25-33% of the total retail demand in the 8-zone area. Whether such a large area (28 square miles), and Leland's simplistic demand calculation is a useful basis to forecast retail floor area in the Corridor is certainly doubtful, and there are no references in Leland's report or the DEIS to rationalize this approach. In addition, Leland's approach did not account for retail floor area "demand" that would be accounted for based on similar 'demand circles' centered on Bellevue Square, Factoria, Crossroads, and Redmond's Overlake area. If these four areas are accounted for, there is no area within the Bel-Red Corridor 'demand circle' that would not be satisfied by existing developments. Further, a short literature search will show that there are many forecasting models that can be used for such an analysis: some examples of more sophisticated models are given in Table Z. The DEIS should be revised to rationalize Leland's approach, or, preferably, to reflect the results of a more systematic, modern analytic technique.

Leland's report and the DEIS (page 2-2) state that "... the market will be able to support ... 2500 to 5000 residential units ..." There is no rationalization or explanation of how these values were derived. Apparently these values were first presented to METROK by City of Bellevue representatives at a meeting between K. McDonald (and others) of the City of Bellevue, and V. Obeso (and others) of METROK in Seattle on 29 December 2005. According to Mr. Obeso, the City of Bellevue 'team' presented the values as part of their "downtown Bellevue East" project. The DEIS (page 8-4) has estimated the "existing population in the corridor" as 290; it is not clear whether this means the population for calendar year 2000, or 2006 (the year the DEIS was prepared). At approximately 2.3 persons per household, this would yield an existent household inventory of about 125 housing units (in either 2000 or 2006),

PSRC's 2003 forecast for FAZ 5205 (the FAZ that covers virtually all of the Bel-Red Corridor) shows a net gain of 1104 housing units (2000-2030); however, virtually all of this forecasted gain would be north of SR-520. Similarly, census tract 237, the tract that covers virtually all of the Corridor shows that (based on the 2000 federal census), the tract's population is 4033, with 1755 housing units. Again, virtually all of the population and housing units would be north of SR-520.

The DEIS, and information received for the City's consultants (Leland Consulting, Crandall Arambula, and CH2M Hill), provide no substantiating analyses to support the 2500-5000 residential unit predictions. Moreover, the Bellevue's Buildable Lands Report dated 31 October 2001 (page 8) confirmed that "... the City can accommodate both its 2012 housing and jobs targets without the need to change the Comprehensive Plan or rezone additional properties to higher densities or intensities." This same conclusion was confirmed to the Bellevue Planning Commission in October 2003 as part of the Bellevue Planning and Community Development Department's review of the 20-year growth targets for Bellevue's Comprehensive Plan update; and to the Bellevue Transportation Commission in June 2005. And King County's Buildable Lands Evaluation Report (September 2002) likewise concluded that "... King County has well over the capacity needed to accommodate the growth that is expected to occur by 2012." Also, Bellevue's Comprehensive Plan (amended through January 2006, page 37 of the Land Use Element) states that "Bellevue has established that it has the zoning capacity to meet the housing and employment targets..." through 2022; there is no mention of a need to rezone the Bel-Red Corridor. The conflict between the City's Buildable Lands Report (and subsequent analyses and presentations to the Planning and Transportation Commissions by the Staff, King County's Buildable Lands Report, and the Comprehensive Plan) and the residential unit predictions cannot be rationalized.

**Table Z. Examples of equations for forecasting demand for retail floor space:**

**Equation 1:**

$$\text{Total Demand}_{\text{year } t} = - 5.986 + 4.556 \ln(\text{Local Population}_{\text{year } t-2}) + 7.845 \ln(\text{Visitor Retail Expenditure}_{\text{year } t})$$

**Equation 2:**

$$\text{Total Demand}_{\text{year } t} = - 8.179 + 6.329 \ln(\text{Visitor Retail Expenditure}_{\text{year } t}) + 4.947 \ln(\text{Working Population}_{\text{year } t-1})$$

**Equation 3:**

$$\text{Total Demand}_{\text{year } t} = 3.710 + 12.647 (\text{Retail Employment}_{\text{year } t}) - 5.451(\text{Average Retail Employment per Unit Floor Area}_{\text{year } t-1})$$

**Equation 4:**

$$\text{Total Demand}_{\text{year } t} = 2.858 + 38.654 (\text{Total Demand}_{\text{year } t-1}) - 3.197 (\text{Retail Property Price}_{\text{year } t})$$

**Equation 5:**

$$\text{Total Demand}_{\text{year } t} = - 16.632 + 6.190 \ln(\text{Visitor Arrivals}_{\text{year } t}) + 2.426 \ln(\text{Retail Sales}_{\text{year } t}) - 2.961 \ln(\text{Retail Property Price}_{\text{year } t})$$

**Equation 6:**

$$\text{Total Demand}_{\text{year } t} = - 8.862 + 6.923 (\text{Visitor Arrivals}_{\text{year } t}) + 10.004 \ln(\text{Retail Sales}_{\text{year } t}) - 5.406 (\text{Retail Property Price}_{\text{year } t})$$

where  $\ln$  = natural logarithm

Source: Hong Kong Planning Standards and guidelines; Planning Department, The Government of Hong Kong Special Administrative Region, Peoples Republic of China; February, 2007.

### 2.1.2, continued

Finally, *none of the City Council's 10 'planning principles' deals directly with, or even mentions including provisions for increased residential housing in the Corridor. If this was specifically intended or required by the Council, it should have been distinctly mentioned as a separate 'principle.'*

*Thus it is clear that the housing demand predicted (as distinct from forecasted) for the Bel-Red Corridor can only be characterized as arbitrary and capricious, since it is not supported by any analysis or technically substantiated forecast, and was not intended or required by the City Council as expressed in their 'planning principles' for the Project. Moreover, the PSRC-forecasted increase in housing units through 2030 can easily be satisfied by available zoned land throughout the City, or by recent City rezones contemplated for Crossroads and Factoria. And since demand for housing is greatly affected by many exogenous variables (mortgage interest rates, economic activity levels, income levels, etc.), the predicted demand for housing should be eliminated from the DEIS/EIS.*

2.1.3 The biased and unsubstantiated material on page 2-7 regarding the Steering Committee's evaluation of feedback from corridor stakeholders and the public should be purged from the DEIS/EIS. In addition, the DEIS/EIS should recognize the limited amount of analysis that has been done for the Project, especially the deficiencies in the market analysis performed by Leland Consulting. In addition, the DEIS/EIS should acknowledge that the 3 Action Alternatives are not substantively different, and the fact that the City and its consultants never analyzed the possible developments within the Corridor for the No Action alternative.

## 2.2 Chapter 4

2.2.0 *This chapter does not include an analysis of the opportunities for enhancing Corridor watershed processes under the No Action alternative. This deficiency should be corrected, as it is clear that there are many opportunities for such enhancement under the No Action alternative because of the City's strong commitment to watershed and habitat enhancement and protection. For example, "barriers" in Sturtevant Creek, West Tributary, Goff Creek, Kelsey Creek, and Sears Creek could all be mitigated or removed entirely by individual City-proposed and/or funded initiatives. These mitigation 'projects' would be far less costly than similar actions under the DEIS Action Alternatives, even if some property owners were to be offered 'bribes' for such mitigation by more intensive zoning on their property. The cost for any mitigations undertaken in response to such 'bribes' would only be passed on to users of their properties, and there is no analysis to show how any alleged 'public benefits' (under such schemes) would be disseminated to the public<sup>3</sup>.*

## 2.3 Chapter 5

2.3.0 The noise analysis reported in this chapter is not credible because the projected 2030 traffic counts (sometimes mistakenly referred to as "volumes") are virtually identical for all the (No Action and Action) alternatives, and are probably well inside the error levels to be expected for the traffic models apparently employed by CH2M Hill. The inclusion

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<sup>3</sup> See: Cheung, Steven N. S., "The Myth of Social Cost." CATO Institute; San Francisco. 1980.

### 2.3.0, continued

of noise generated by construction activity is entirely superfluous because this DEIS is a non-project DEIS, and does not need to consider hypothetical activity for specific building/implementation projects. Thus, all material related to the City's proposed design solutions to implement their intended rezone and land-use intensification should be removed from the DEIS and the succeeding EIS.

The mitigation measures discussed in the DEIS are entirely superfluous to the DEIS and the succeeding EIS as they refer to proposed design solutions to implement the City's proposed rezone and land-use intensification within the Corridor. The mitigation measures identified during 'construction' have no relevance to the DEIS; the proposed mitigation measures identified for 'operation' likewise have no relevance, since this is a programmatic DEIS, not a DEIS for a specific project. In any event, the proposed mitigation measures are totally without merit, and have no bearing on any real-world mitigation measures that might be implemented under specific proposals for development under the City's proposed scheme to rezone the Corridor. The measures identified are merely 'cook-book' measures derived from any standard handbook on noise/sound control for transportation projects, and have no direct bearing on the subject of the proposed changes to the City's comprehensive plan, subarea plans, land-use code, etc.

### 2.4 Chapter 6

2.4.0 This chapter should be rewritten to make it conform to requirements for preparation of non-project DEIS/EISs. For example, all material related to construction impacts should be deleted, as no construction is proposed under this non-project DEIS. The entire chapter should be rewritten to reflect the general environmental hazards within the Corridor without presupposing the implementation of the City's proposed rezone and land-use intensification. All "operational impacts" should be deleted, as there are no specific proposals for development under this non-project DEIS.

### 2.5 Chapter 7

2.5.0 In the 4th paragraph on page 7-1 of this chapter, the DEIS asserts that " ... the policies of previous plans are considered less relevant than ..." the Bel-Red Corridor Project planning principles adopted by the City Council for the Project. This statement directly contradicts the requirements of Washington State laws (RCW and WAC), e.g., RCW 36.70A.035, RCW 36.70A.130(1)(d), RCW 36.70A.140, RCW 36.70A.210; City codes, e.g., 20.40.401, etc.; Comprehensive Plan policies CP-2, CP-3, and CP-5; and paragraph 4.1 of SEPA Handbook, Publication #98-114. All of these sources require that existing plans and policies must be considered in evaluating the No Action and Action alternatives described in the DEIS. In addition, *the so-called 'principles' are merely a set of statements included in the Council's motion at the Council's 10 October 2005 study session to approve selection of members of the Project Steering Committee; this motion was approved by a vote of 6-1. These 'principles' were not subjected to any public scrutiny or comment, and were not even discussed by the Council in their 10 October 2005 study session. Therefore these 'principles' can only be used as general terms of reference in assessing the No-Action and Action alternatives; they have no force majeure quality. In any event, the No Action alternative is almost wholly compliant with their provisions: see Table 5 above.*

## 2.5, continued

2.5.1 The writing on page 7-7 of this chapter states that "... many commercial and industrial buildings in the study area are between 25 and 35 years old." No statistics or data are given to substantiate this claim; also, most commercial and industrial buildings have economically useful lives of 30-50 years, so the comment in the DEIS is of no relevance whatsoever. Also the assertion on page 7-7 (under "Building Characteristics") that there has been limited development in this area since 1990 is not substantiated by any data; moreover, there has been significant continuing property improvements and new building in the Corridor for the last several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated and expanded its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9, above.

2.5.2 The writing on page 7-7 of this chapter comments that the FARs for buildings in the study area range from 0.4 to 0.6, and notes that the FAR for new developments in the downtown Bellevue office/business district is 2.74. No source or data is presented to justify this assertion, nor is there any relevance in comparing multi-story high-rise buildings with the buildings that might be built in the Corridor under the staff's proposed rezone.

2.5.3 The text on page 7-9 of this chapter asserts that the Washington State GMA (RCW 36.70A), PSRC's Vision 2020 Plan, King County Countywide planning policies, and the Bellevue Comprehensive Plan (BCC Title 21) were designed to "... ensure development consistency and predictability and provide a framework for determining whether a project under consideration aligns with the community's vision of its future and the characteristics of its particular location." This statement (in addition to not being too coherent) is manifestly untrue, as there is no document that captures the Bellevue community's vision of its future, and no documented evidence that any attempt has ever been made to assemble such a document. All City documents such as the Comprehensive Plan and the subarea plans have been developed with virtually no input from a broad range of Bellevue citizens; the City's voter participation rates in general and City Council elections confirm that the vast majority of Bellevue citizens have no interest in participating in the development of such visionary expressions. Rather, the few documents such as the Comprehensive Plan and subarea plans reflect the narrow vision of the City's (and the Region's) power brokers; if this were not true, the built environment of the City, particularly the downtown area, would look substantially different than it does today. In addition, the documents referred to (GMA, Vision 2020, etc.) do not provide any sort of 'framework' or reference system within which some sort of 'community vision' can be constructed; indeed, there are no extant processes that can be used to develop such visions. These kind of absurd statements should be removed from the DEIS/EIS.

2.5.4 Missing from the list of policies/plans alluded to on pages 7-9 and 7-10 of this chapter is any mention of the City's Buildable Lands Report, and subsequent staff analyses that confirmed that there was no reason to rezone land within the City to meet the City's population/employment growth targets out to 2020. While this report and

#### 2.5.4, continued

the staff analyses are not codified in City codes, they have important relevance for the rationale for this project, and should be discussed in this Chapter of the DEIS.

2.5.5 Economic development policy ED-26 is totally irrelevant to this DEIS, and to evaluation of the No Action and Action alternatives described in the DEIS. ***There is absolutely no evidence that the Bel-Red Corridor is in economic decline as judged by any factual statistical evidence, or any information provided by the City staff or the City's consultants.*** As noted above, there have been many examples of property improvements and redevelopment in the Corridor over the past several years: a new medical office building was recently constructed at the intersection of 130th NE and the Bel-Red Road; Safeway has renovated its retail complex at the Evergreen Shopping Center; businesses along NE 20th, between 140th NE and 148th NE have been renovated; Coca Cola has made significant improvements to its plant; the Whole Foods Market was newly built; etc. In addition, property sales in the Corridor have continued over the last several years: see Table P9 above.

2.5.6 On page 7-13 of the DEIS, under Bel-Red/Northup Subarea Plan, it is asserted that the City has " ... recognized the need to reassess the policy direction for the Bel-Red Corridor" (which is not the same as the Bel-Red/Northup subarea). This statement is misleading because the City staff has never developed any credible rationale for their proposed rezone and land-use intensification in the Corridor, as has been amply shown in the preceding material. In fact, the City staff has never advanced one credible, defensible rationale for their proposed rezone in this Corridor. Yes, some changes in land use have occurred, but these changes are all permitted uses under the existing zoning for the Corridor, otherwise, the City would not have allowed them to be made. ***The gradual change in land use is a result of property owners' assessment of changing market conditions and demand for uses in the Corridor. This sort of evolutionary change is to be expected, and results in much more efficient development than the grandiose scheme preferred by the City staff. Further, it allows for more gradual deployment of new transportation and other public infrastructure, and ensures that the market can absorb the new developments in an orderly and efficient manner.*** Indeed, there are only two credible reasons why the City staff has proposed this grandiose rezone:

1. ***To increase the tax revenue flows to the City; and,***
2. ***To augment and consolidate Sound Transit's plan to deploy uneconomic, non-cost-effective light rail transit from Seattle to Bellevue and on to Overlake Transit Center and (eventually) to Redmond.***

2.5.7 The description of the land use impact on page 7-16 of the DEIS incorrectly states that the City will propose to adopt changes to the Comprehensive Plan, and other affected policies, codes and zoning to implement the type of development envisioned by the City staff and as described in the 3 Action Alternatives. ***There is no basis at all for this conclusionary comment in the DEIS, as the City Council has yet to consider the No Action and Action Alternatives, and, because of the excessive costs for transportation and other public infrastructure, may choose a more rational alternative.*** This part of the DEIS should be revised to state only that the Council will consider possible alternatives, and will direct the staff to prepare the necessary proposals for

## 2.5.7, continued

changes to the Comprehensive Plan, subarea plans, landuse code, and other affected City documents to implement the Council's approved approach to land use in the Corridor.

2.5.8 The description of ways to reduce the consumption of land for recreation uses under the Action Alternatives on pages 7-17 and 7-18 should be revised to delete the comment about "the Corridor's high land values" as there is no analysis that estimates what Corridor unit or parcel land prices would be under the Action Alternatives, and comparison to the unit/parcel land prices in Downtown Bellevue is not appropriate unless the City acknowledges that it is proposing to develop the Corridor into something like the Downtown area. In addition, the description of ways to lessen the need for recreation facilities under the Action Alternatives ("...park-school sites, athletic fields, private parks, ... green streets ..." etc.) is entirely inappropriate as it tends to bias the DEIS in favor of the Action Alternatives. In fact, no school sites have been proposed; offsetting recreational 'needs' by artificial, bureaucratic-imposed solutions implies that social benefits can be transferred to the public through such schemes; these approaches to public policy are only thinly disguised mechanisms for transferring wealth from the public to private land owners and property developers.

2.5.9 The entire discussion on pages 7-18 and 7-19 on land use, and consistency with plans, policies and Bel-Red Corridor Planning Principles is totally misleading, biased, and unsupported by any analysis or rationale:

a. There is no analytic or other data to support the assertion that there would be no major changes in land use in the Corridor under the No Action Alternative. Rather, normal evolutionary, market-driven changes to land-use and zoning changes are to be expected under the No Action alternative. The past 50 years of City history has shown conclusively that such evolutionary changes are to be expected, and do occur. Neither the City staff nor its consultants have examined this development vector, and the City has not obtained any significant information on such possible development from a large number of the Corridor land/property owners, nor from any independent consultant. In addition, the City staff has made no attempt to evaluate this possible development vector. ***To assert that the City would not be able to respond to employment and population growth 'pressures' from Downtown Bellevue and Redmond's Overlake developments is absurd!*** The City would respond to such developments as it has in the past, by improving transportation infrastructure, improving public amenities, etc.

b. The assertion that the No Action alternative would not support inclusion of residential areas in commercial districts per policy LU-7 is misleading: LU-7 states that this is a good policy " ... where compatibility can be demonstrated." The City has presented no analyses or evidence that residential developments in the commercially-zoned areas of the Bel-Red/Northup sub area would not be compatible, or that such developments have been proposed and denied by the City. This part of the DEIS should be corrected to remove this biased, unsupported assertion.

c. Land use policy LU-23 is a broad policy that cannot be applied to every square meter of the City's area; it is so general and broad as to be virtually meaningless as an instrument of public policy. In addition, there is no operational definition of what this policy means, nor any analysis to show that it should and must be applied to every square meter of the City's area.

## 2.5.9, continued

d. The assertion that the No Action alternative would not support citywide policies of promoting transit use is totally false. Present and likely future developments and land uses in the Corridor under this alternative easily meet the policy provisions of TR-70. This can be accomplished at much lower cost (than the Action Alternatives) by provision of improved bus transit along the Bel-Red Road, NE 20/Northrup, and other north-south arterials, and by working with Sound Transit to evaluate and encourage the provision of an LRT station along the SR-520/LRT route at approximately 124-130th NE. Not only would the No Action alternative provide equal LRT ridership between Bellevue and Overlake/Redmond, but it would do so at much lower cost because less land would be consumed for the LRT route, there would be fewer stations, and it would cost much less to construct. The lower cost of the SR-520 LRT route is confirmed by Sound Transit's evaluation: see "Sound Transit Board Briefing Book, Light Rail Alternatives; East Link Project"; Sound Transit; Seattle; November 2006. *The DEIS discussion on the compatibility of the No Action alternative and LRT transit provisions is totally inaccurate and misleading and should be revised.*

e. Invoking the so-called Bel-Red Corridor Planning Principles into the discussion of the No Action alternative's consistency with plans, policies, and 'principles' is totally fallacious: *the so-called 'principles' are merely a set of statements included in the Council's motion at the Council's 10 October 2005 study session to approve selection of members of the Project Steering Committee; this motion was approved by a vote of 6-1. These 'principles' were not subjected to any public scrutiny or comment, and were not even discussed by the Council in their 10 October 2005 study session. Therefore these 'principles' can only be used as general terms of reference in assessing the No-Action and Action alternatives; they have no force majeure quality. In any event, the No Action alternative is almost wholly compliant with the Council's 'principles': see Table 5, above.*

f. *This non-project-proposal DEIS is conspicuously lacking any summary of the proposed changes to the City of Bellevue's Comprehensive Plan, the Bel-Red/Northrup Subarea Plan, the Crossroads Subarea Plan, the Wilburton/NE 8th Street Subarea Plan, and the Bellevue City Code. Because proposed changes to these plans and the City Code are not defined in the DEIS, there is no way to be sure that all possible impacts have been analyzed and defined. Moreover, the absence of these proposed changes prevents the public and reviewing agencies from clearly understanding exactly what is being proposed. The absence of this information fatally flaws this DEIS.*

2.5.10 There is no justification provided for changing Crossroads subarea policy S-CR-56, as this area (B) of the Crossroads subarea is in close proximity to single family housing to the east, and adequate multifamily-zoned land already exists to the south and southeast of this small area in the Corridor.

2.5.11 On page 7-21 of this chapter it is asserted that the Action Alternatives would facilitate " ... infill development ... and ... would be consistent with a development pattern that reduces consumption of undeveloped land ..." As noted on page 7-2 of the DEIS, only about 12% of the Corridor's land is not developed, and much of this area is 'environmentally constrained;' thus, there is very little land in the Corridor that would facilitate "infill."

## 2.5, continued

2.5.12 On page 7-21 of this chapter, it is asserted that the Action Alternatives would be consistent with the 'overarching goal' of the City's economic development element in the Comprehensive Plan. This same assertion can be made about the No Action alternative, as there are presently about 1600 businesses in the Corridor, with about 21,000 jobs; and PSRC estimates that employment will grow to over 32,000 by year 2030: see Table E49-2 above. Thus, the No Action alternative provides ample opportunity for employment growth over the next 20 years.

2.5.13 Because the amount, kind, intensity and location of City-proposed developments in the Bel-Red Corridor have no substantive basis or rationale, this chapter should first be extensively revised to delete all the detailed design-solutions extensively and excessively described in the Action Alternatives. Second, include the proposed changes to the City's Comprehensive Plan and the Subarea Plans, the City's Land Use Code, and all other affected codes and documents. These proposed changes should be accompanied by specific 'objectives' for the proposed revisions, rather than relying on vague 'planning principles' resulting from City Council unilateral actions or uncoordinated input from an ad hoc citizen committee. Third, the City staff should then describe alternate means of achieving the objectives, rather than proposing specific design solutions as described in the Action Alternatives of the DEIS. This revision to the DEIS would bring it into conformance with WAC 197-11-442. All material in this chapter related to mitigation measures for "construction" and "operation" should be deleted, as this is a non-project proposal, and such mitigation provisions would only be described in DEIS/EISs for specific development proposals.

## 2.6 Chapter 8

2.6.0 As noted above, the Leland Consulting Group studies referred to on page 8-7 of this chapter have no substantive or rational basis; the "data" used in the Leland reports are simply one-time snapshots of certain characteristics of developments/activities in the Corridor. Leland's so-called 'market analysis' is nothing more than a generalized, unsubstantiated prediction of possible developments advanced to substantiate the City staff's intention to rezone the Corridor to more intense use. **No other independent, unbiased analyses were undertaken by the City to compare to Leland's predictions.**

2.6.1 The DEIS asserts on page 8-7 that " ... (n)ew manufacturing or warehouse uses have become less economically viable due to increasing land values. These values indicate that investors are anticipating a future change in land use regulations that will create redevelopment opportunities." **There is no data provided in the DEIS to substantiate this absurd claim! The only recent/contemporary sources of anticipatory changes to intensify the land use in the Corridor are (1), the unsubstantiated reports submitted to the City as part of the Bel-Red Corridor Project from consultants committed to supporting the staff's intention to rezone the Corridor; and, (2), the continuing reinforcement of the likelihood of such changes by pronouncements of City staff members.**

2.6.2 Delete all text in the chapter related to construction impacts (pp 8-8 and 8-9), as this a non-project DEIS, and no project development is anticipated under this DEIS.

## 2.6, continued

2.6.3 There are no analyses or other data to confirm the assertion on page 8-9 (under "Operational Impacts") of this chapter that some housing development would not take place in the office and commercial zoned areas of the Corridor, or that future changes to the City's land use code would not permit such development in the general commercial zoned areas. In addition, the City's Buildable Lands Report dated 31 October 2001 (page 8) confirmed that "... the City can accommodate both its 2012 housing and jobs targets without the need to change the Comprehensive Plan or rezone additional properties to higher densities or intensities." This same conclusion was confirmed to the Bellevue Planning Commission in October 2003 as part of the Bellevue Planning and Community Development Department's review of the 20-year growth targets for Bellevue's Comprehensive Plan update; and to the Bellevue Transportation Commission in June 2005. And King County's Buildable Lands Evaluation Report (September 2002) likewise concluded that "... King County has well over the capacity needed to accommodate the growth that is expected to occur by 2012." Also, Bellevue's Comprehensive Plan (amended through January 2006, page 37 of the Land Use Element) states that "Bellevue has established that it has the zoning capacity to meet the housing and employment targets..." through 2022; there is no mention of a need to rezone the Bel-Red Corridor.

2.6.4 The assertion on page 8-13 (under "Economics") that there would only be minor positive economic benefits under the No Action alternative is totally unsupported by any credible analysis or data. The Leland study is a biased, development-oriented study that characterized the current and possible future developments in the Corridor under a no-action plan in a pejorative manner to reinforce the half-baked assertions in the study. Also, there is no evidence, or data, and no studies to substantiate the assertion that "few transportation projects would be built" under the No Action alternative: the City monitors transportation/traffic conditions in the City on a regular basis, and regularly updates its Transportation Capital Investment Plan, and other documents used by the City's Transportation Department and the City Council to evaluate the need for transportation system improvements in the City. There is no reason to believe that this oversight and response would not continue under the No Action alternative. For example, the City plans to make a number of intersection improvements within, or in the vicinity of the Corridor in the next several years; 130th NE between the Bel-Red Road and NE 20th is on the 2007 CIP Project plan for an overlay; the project on this street should start by mid May or early June of 2007; etc.

## 2.7 Chapter 9

2.7.0 Delete all material related to construction impacts in this chapter, as no construction is proposed under this non-project proposal.

2.7.1 This chapter does not provide any overview of what actions could be taken under the No Action alternative to improve the aesthetic character of the Corridor; this deficiency should be corrected.

## 2.8 Chapter 10

2.8.0 This chapter is virtually incomprehensible because it contains excessive detail for a non-project DEIS, and because it does not use the same modeling and data reporting methodology that the City of Bellevue normally uses to report traffic counts (sometimes called 'volumes') and intersection level of service measures, and was not based on evaluations made by the Bellevue Transportation Department's Modeling and Analysis section. Consequently, it is virtually impossible to evaluate the information contained in this chapter of the DEIS and to compare it to comparable information previously reported by the City of Bellevue for similar or identical arterials or intersections. In addition, the basis of comparing the No Action and Action alternatives is so arcane, that it can only be understood by the analysts that created the analysis.

For example, as shown in Table 33-1, level of service 'grades' for various intersections and dates given in the DEIS are significantly different depending on the source of the information. Intersection delay times and grades are given for various intersections in and remote from the Corridor (see, for example Table 33-2), but there is no rationale for selection or exclusion of various intersections, particularly those remote from the Corridor. Also, the intersection and other transportation improvements assumed for the No Action and Action alternatives are almost impossible to discover from the information given in this chapter. In addition, this chapter of the DEIS reported bidirectional traffic counts for 2005 PM peak hour conditions at various locations along arterials within and near the Bel-Red Corridor; normal traffic count information reported by Bellevue's Transportation Department does not provide such data, so it is impossible to verify the accuracy of the DEIS information.

2.8.1 All material relating to construction impacts should be deleted from the DEIS as this is a non-project DEIS and no construction is proposed.

2.8.2 The mode-split information given on page 10-24 of the DEIS is totally unverifiable, and totally inconsistent with mode-split projections from other sources: see Table MS999 attached. Because this DEIS is a non-project DEIS, and because reliable transit ridership projections from Sound Transit and Metro are not available, speculation about possible mode-split ratios is totally unjustified, and totally unnecessary.

2.8.3 The information shown on pages 10-25 through 10-34 cannot be verified by any rational analysis or comparison with information from other sources, such as the Bellevue Department of Transportation. Because this DEIS is a non-project DEIS, this level of detail is totally unjustified, and should be removed from the DEIS, especially because there is no specific development or transportation-improvement proposals being made under this DEIS.

2.8.4 There is far too much detail for the LRT transit ridership projections in this chapter: details of Sound Transit's LRT vehicle design, headways, service frequency, routes and configurations (elevated, at ground level, etc.) for the East Link are not known, so all the material on pages 10-38 through 10-42 is pure speculation; it should be removed from the DEIS. In addition, the material on pages 10-43 through 10-47 is far too detailed for a non-project DEIS; it should be removed from the DEIS.

**Table 33-1. Bel-Red Corridor Intersection LOS Data, PM Peak 2-Hours  
Grades/Values**

Intersection No.	MMA No.	2005 LOS,	2011 LOS	Existing 2005 Conditions (From DEIS Table 10-2)	
		Peak 2-Hr PM	Peak 2-Hr PM	LOS	Delay, seconds
		LOS Snapshot 30-Jun-06	05 SoM Rpt July 1, 2006	"Grade"	per vehicle
118	2	0.559 (A)	0.492 (A)	C	28
25	3	0.732 (C)	0.711 (C)	F	107
26	3	1.074 (F)	1.086 (F)	F	101
29	4	0.674 (F)	0.845 (D+)	D	47
30	4	0.710 (C)	0.757 (C)	D	46
32	4	0.539 (A)	0.549 (A)	C	31
34	4	0.807 (D+)	0.779 (C)	D	52
35	4	0.710 (C)	0.586 (A)	D	41
37	4	0.568 (A)	0.456 (A)	C	36
68	4	0.577 (A)	0.568 (A)	C	27
88	4	0.624 (B)	0.524 (A)	D	41
114	4	0.697 (B)	0.680 (B)	Not Incl.	?
116	4	0.617 (B)	0.608 (B)	Not Incl.	?
117	4	0.524 (A)	0.476 (A)	Not Incl.	?
139	4	0.607 (A)	0.462 (A)	Not Incl.	?
233	4	0.723 (C)	0.685 (B)	C	32
58	5	0.532 (A)	0.534 (A)	D	38
62	5	0.784 (C)	0.796 (C)	D	51
41	9	0.728 (C)	0.746 (C)	D	51
49	9	0.844 (D+)	0.896 (D)	D	48
39	12	0.750 (C)	0.722 (C)	D	49
40	12	0.712 (C)	0.747 (C)	D	50
47	12	0.933 (E+)	0.747 (C)	E	66
48	12	0.884 (D-)	0.803 (D+)	D	52
59	12	0.600 (B)	0.639 (B)	D	37
60	12	0.643 (B)	0.599 (A)	D	37
61	12	0.678 (B)	0.703 (C)	F	94
64	12	0.626 (B)	0.807 (D+)	D	36
81	12	0.970 (E-)	0.851 (D+)	Not Incl.	?
188	12	0.867 (D-)	1,167 (F)	E	57
189	12	0.402 (A)	0.858 (D-)	B	12

Avg. Delay                      48.7

Sources:

1. Intersection and MMA numbers from CONCURRENCY UPDATE;  
City of Bellevue, 1 October 2006
2. 2005 and 2011 LOS values: State of Mobility Report; City of Bellevue, July 2006
3. Existing 2005 Conditions: Bel-Red Corridor DEIS; City of Bellevue, 25 January 2007

**Table 33-2. Bel-Red Corridor Intersection LOS Data. PM Peak 2-Hours  
Grades/Values**

Intersect. No.	2030 Values for 'Grade'/Delay Time, seconds, For Alternative (From Table 10-6 of DEIS)			
	No Action (28 Inters.)	A1 (31 Inters.)	A2 (32 Inters.)	A3 (31 Inters.)
118	C/29	C/32	C/30	C/32
25	F(F)/136(94)	F/133	F/140	F/152
26	F/115	F/127	F/128	F/134
29	F(E)/97(71)	F/128	F/99	E/78
30	D/51	D/52	D/53	D/53
32	C/35	D/40	D/53	C/35
34	D/38	D/37	D/46	E/59
35	D/45	E/57	D/51	D/52
37	?	?	?	?
68	D/50	E/67	E/63	D/49
88	D/51	D/54	E/64	E/68
114	?	?	?	?
116	?	?	?	?
117	?	?	?	?
139	D/55	E/57	E/61	E/61
233	C/22	E/61	E/61	E/72
58	D/45	D/48	D/47	D/47
62	F(E)/116(63)	E/64	E/79	D/53
41	E/71	F/82	E/77	D/48
49	F(E)/88(65)	D/52	E/70	E/78
39	F(E)/103(63)	E/77	E/75	D/52
40	E(D)/66(53)	D/54	D/54	D/53
47	F(E)/109(68)	E/79	E/77	E/75
48	F(E)/93(80)	F/88	F/84	F/91
59	C/33	D/40	D/37	D/41
60	D/51	D/51	C/50	D/51
61	F(D)/90(52)	D/50	D/55	D/52
64	E(D)/73(53)	D/52	D/52	E/65
81	?	?	?	?
188	F(E)/108(72)	E/79	E/73	F/80
189	E/62	E/65	E/64	E/72
902	C/28	E/60	E/69	F/147
903	N/A	N/A	B/14	N/A
904	N/A	E/74	D/38	D/49
905	N/A	E/69	D/49	D/55
906	N/A	D/50	E/57	D/55
907	C/34	D/51	D/53	E/57
Total Delay Delay/Int.	1894 (1549) 67.6 (55.3)	2030 65.5	2023 63.2	2066 66.6

Sources:

1. Intersection numbers from "CONCURRENCY UPDATE," City of Bellevue, 1 October 2006
2. Projected 2030 Values: DEIS for Bel-Red Corridor Project

Avg. Incr.  
2005-2030  
A1,A2,A3=1.34  
NoAct =1.14 With Imprvmts

**Table MS 999. Mode Split Values from Various Sources**

Source	Predicted Mode Split, Percent				Mode Split Applies to Area
	SOV	HOV	P&R Transit	P&R Pedestrian	
DEIS No Action	86	4-5	1-3	7	Bel-Red?
Action #1	75-80	4-5	1-3	13-18	Bel-Red?
Action #2					
Action #3					
PSRC Vision 2020 Plus 20 DEIS	76	?	9-12 (Work trips)	?	RSRC 4-County
WSDoT Cong Rel. Anal.	87(?)	7	6 (Value is for both modes.)		WSDoT Cent. Pug. Snd.
BKR 2004 (June 2005)	82,6	9	0.8	7.6	CoB
King Cnty Bnchmark	70 (2004)	10 (2004)	9 (value is for both Modes)	2004,	King Cnty.

Source:

1. DEIS: Bel-Red DEIS; City of Bellevue; 25 January 2007
2. PSRC Vision 2020: DEIS for PSRC Vision 2020 + 20 DEIS; PSRC, 2006.
3. WSDoT Cong. Rel. Anal.: Congestion Relief analysis, Central Puget Sound WSDoT; Olympia, March 2006.
4. BKR 2004: "2004 Base year BKR Modle Report;" City of Bellevue Transportation Dept., Bellevue, 30 June 2005.
5. King Cnty Benchmark: King County Benchmarks Report; 2006; Transportation; King county Metro, May 2006.

2.8.5 All construction and operation impact/mitigation material on pages 10-47 through 10-49 in this chapter should be deleted, as this is a non-project DEIS.

## 2.9 Chapter 11

2.9.0 All the material in this chapter should be greatly generalized to remove the excessive and speculative detail as this is a non-project DEIS, and no specific developments are proposed. The impacts on public services and utilities can only be reasonably assessed when specific proposals are advanced under the revised Comprehensive and Subarea plans, revised Land Use Codes, etc.

## 2.10 Appendix F

2.10.0 Delete this entire appendix, as it is far too detailed for a non-project DEIS.

## 2.11 Appendix H

2.11.0 Delete this entire appendix, as it is far too detailed for a non-project DEIS. Any speculative impact assessments of the No-Action and Action alternatives (e.g., as detailed in Tables F-2 and F-3) have no relevance for a non-project DEIS, as no developments are proposed under this DEIS.

**O'Neill, Kevin**

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**From:** Alan Carr [akrjcarr@comcast.net]  
**Sent:** Sunday, March 11, 2007 8:55 PM  
**To:** BelRed  
**Subject:** DEIS comments

It is difficult to find the time to review and comment on this large volume of material. I was unable to download Chapter 6 of the DEIS on the City's website. It appears that the negative impacts of the proposed rezones have been downplayed.

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

Air quality Table 3-3 shows increases in all categories of emissions above those of the No Action Alternative. Yet the report concludes no adverse air quality impacts. It appears to me that alternatives 1, 2 and 3 lower the air quality in my neighborhood when compared to the No Action Alternative. While it may not violate recognized air quality standards, more carbon monoxide in the air we breathe is an adverse impact on my family. Furthermore, the operational impact section under Air Quality states that maintaining traffic flow will reduce idling and therefore, reduce emissions, but it is difficult to tell what traffic flow steps will be taken. Currently even when roads are clear, it is all too common that we must sit and idle in a left turn lane when there is no oncoming traffic. With rare exceptions we are over-regulated by left turn arrows that force us to wait and burn gas. It is unclear to me what measures the city has in mind to improve flow, because there are improvements that could be made today if the city wished to reduce emissions by improving traffic flow.

My family has routinely patronized many businesses in the Bel-Red Corridor over the last 15 years. Many of these businesses have been fixtures in our community and they should be permitted to remain right where they are. Compared to alternatives 1, 2, and 3 the current zoning mix serves the existing community just fine. The proposed rezones will adversely affect small business owners. Offering the ability to relocate is not always a good alternative for some businesses as this will cause some to just close their doors. Once such businesses are lost they are gone – and there is no guarantee that a replacement will provide the same services. It appears to be an oversight that current business owners have not been adequately represented on the steering committee.

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March 9, 2007

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

Re: Bel-Red DEIS – Zoning Change Results in Non-Conforming Use

Dear Ms. Helland:

We are owners of a building at 12828 Northup Way. All three alternates propose to change the zoning from LI to Retail/Commercial (presumably GC).

These properties are small, in part, due to the freeway condemnation for the relocation of Northup Way west of 130<sup>th</sup>.

1. That change will render our building non-conforming, because it's over the 30 ft. height allowed in GC. (It was built to conform to the LI height of 45 ft.)
2. There are thirteen properties that are north of Northup and between 124<sup>th</sup> and 130<sup>th</sup>. One is undeveloped. Of the remaining twelve, seven don't have direct access to Northup. The five properties that do access share two driveways. The west most driveway is steep and the east driveway has reduced entering sight distance. When the road was 5-laned, the high traffic volumes and speeds made entering difficult. Designating this property commercial would increase the turning traffic and be in conflict with Policy S-BR-25, ref. Pg. 7-13.

This strip of properties is clearly not suited to retail/commercial.

Sincerely yours,

Michael & Colleen Yuhl

Michael H. Yuhl  
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mcyuhl@msn.com

March 11, 2007

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

Re: Bel-Red DEIS – The 75-80 du/acre Projected Density

Dear Ms. Helland:

This letter addresses the projected density of 75 to 80 dwelling units per acre near the LRT stop on 130<sup>th</sup> for Alternates 2 & 3.

On Attachment 1, I've calculated what's achievable on a typical parcel on 130<sup>th</sup> and concluded that, with present parking requirements, the achievable density is under 40 du/acre. (Higher density could be achieved if the entire block was one parcel, because it would eliminate the need for interior lot line landscaping and cover a higher percentage of the land.

The DEIS should be supplemented with calculations on how this 75 – 80 du/acre density is achieved, or what reduction in parking would be needed to achieve that density.

Sincerely yours,

  
Michael H. Yuhl

**Attachment 1**

To letter to City dated 3/11/07

By Michael Yuhl

What is the maximum housing over business density under present codes?

Housing density of 75-80 units per acre are forecast for Alternate 1 & 2 (Ref pg. 2-12 and 2-14). The higher densities do not depend on LRT as stated on page 2-6. That means on-site parking must be provided.

1. Plans 2 & 3 show mixed use housing/commercial center at 130<sup>th</sup> & 16<sup>th</sup>. (There are about 80 properties within ¼ mile of this intersection.) Those plans show blocks about 330 ft. square. Figure 6-1c shows property lines at a scale of approximately 1" = 1000'.
2. How could this site be re-developed? Take an existing site on the east side of 130<sup>th</sup>, north or south of future 16<sup>th</sup>. These sites are about 200 ft. on 130<sup>th</sup> and 230 ft. E-W. These sites will have to dedicate at least 30 ft. for future 16<sup>th</sup>. Redevelopment will require 10 ft. of landscaping along street frontages and 6 ft. along interior property lines. That means the development footprint is 200 ft. on 130<sup>th</sup> frontage, less 30 ft. ROW for 16<sup>th</sup>, less 10 ft. + 6 ft. landscape = 154 ft. The E-W 230 ft. – Landscaping will reduce the site by 10 ft. in front and 6 ft. in back = 214 ft.
3. Development Basics: The restraint on development is the number of parking places. Under this scenario, assume the entire site is covered with parking. (A building will be built above some of this parking.) 90° 2-way double loaded aisle with double striping is selected. The least land area per car is the 62'-8" wide lot with 8'-4" wide stalls. (That's 261 sf/car. Actual space is 261 sf + 17.5 sf of landscaping requirement = 279/sf/stall.) That assumes parking regular cars which require 18 ft. deep stalls, and a 28 ft. aisle. If all compacts were assumed, the stalls could be reduced to 14.75 ft. and the aisle reduced to 22 ft., but the Code requires that each size be accommodated.
4. The development area calculated above is 154 ft. x 214 ft. The 62'-8" parking lot width is the controlling dimension. It divides into 154 ft., 2.45 times and into 215 ft., 3.43 times. The building will be set north-south with a parking lot on the east and west.
5. The maximum building length could be 154 ft., however it should be a divisible by the width of a pair of parking places (16—8") for building structural purposes. That would make the building 9 bays long or 150 ft. the building would need to be at least 62'-8" wide in the garage for parking. Use 64 ft. outside dimension.
6. The garage would park 36 cars. Two spaces would be lost because an access ramp would be needed and another two lost due to an elevator and stairs. That leaves 32 spaces.

7. The two outside lots would each have a potential for 36 spaces. One lot would lose two spaces for the ramp down to the below grade garage. That would leave  $32 + 36 + 34 = 102$  parking places.
8. Final grade would be adjusted so the garage was below grade, and hence the floor above, the business floor, at grade. Assume this  $64' \times 150'$  floor could have a multiple of uses. The gross area is 9600 sf. Deduct  $5''$  for exterior walls +  $16\text{-}1/2 \times 13'$  for an outside elevator/stairs/hall to connect garage to residences + 2 end stairs at  $7' \times 14' = 590$  sf. Say 9,000 net sf divided by 250 sf/park places = 36 parking places required.
9.  $102$  total parking spaces – 36 = 66 parking places available for residences above. LUC requires 1.6 parking places per 2 BR unit. 66 divided by 1.6 = 41 apartments. Per DEIS, a 2 BR apartment average is 1200 sf. 9000 sf per floor divided by 1200 = 7.5 units per floor. 41 units divided by 7.5 =  $5\text{-}1/2$  floors.
10. This scenario doesn't use up the entire site. The 214 ft. E-W is occupied by two  $62'\text{-}8''$  lots + 64' building allows for 5' of landscape between parking lot and building. The development occupies 199 ft. whereas 215 ft. is available.
11. The development density is: On a gross-using dimension to center of abutting streets  $200' \times 260' = 1.19$  acres. 41 units on 1.19 acres is 34 du/acre.
12. In the above scenario,  $13' \times 170$  ft. of the site isn't needed. If that was subtracted out, the gross density would be 36 du/acre.
13. If a second parking floor was needed, the 32 additional spaces would support 20 additional units. That would be 51 du/acre. It's not practicable to assume that a 2<sup>nd</sup> level of parking could be achieved due to the needs for ramps to reach the above grade floor.
14. Conclusion: The projected redevelopment to 75 – 80 du/acre is not achievable for this size or smaller site.
15. What happens if the ground floor commercial is parking for multifamily? That would increase the 102 spaces by an additional 32 for a total of 134. With 2 BR units, that parking would support 134 divided by 1.6 = 84 du/acre. At  $7\text{-}1/2$  units per floor, that would require 11 floors and the ground floor. That's too high. Instead of an 11-story building over one of 3 parking lots, it would be two buildings over 2 of the 3 parking lots.
16. The gross density would be 70 du/acre, but there would be no commercial use.

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March 10, 2007

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

Re: The Area North of Northup Way  
Bel-Red DEIS Retail/Commercial in all 3 Alternates (LTR 2)

Dear Ms. Helland:

All three alternatives show the area North of Northup Way/20<sup>th</sup> between 121<sup>st</sup> to about 135<sup>th</sup> to be changed from LI to Retail/Commercial.

A. Figure 1 of the Leland Report shows 11 subareas on page 2, but only discusses 9 of these on pages 4 & 5. The reasons why these two areas were omitted from the Leland Study should be provided.

B. The description of this area on page 1-4 is virtually the same as page 5 of the Leland Report, yet the size of this area now includes one of the unidentified areas in the Leland Report. The land use description identified Lowes, Tap Plastic and Smith & Hawkins, and a large amount of mini-storage space. No mention is made that the predominate use of the area is single story office. This needs to be explained in the FEIS.

C. The DEIS data referenced below doesn't support a need for expansion of the retail/commercial zone by approximately 1,300,000 sf of land area, because:

1. Table 7-2 shows the projected retail use between 200,000 and 500,000 sf. (That number appears to come from Table 7 of the Leland Report, which shows this need within a 3-mile radius.)

2. Page 37 of the Leland Report points out that the Bel-Red area has 2.5 times as much space as the County-wide average. This report goes on to say that downtown Bellevue will capture much of the growth in retail space need, and, except for restaurants, the additional office development will produce little additional demand.

3. There are vacant available sites, i.e. K-Mart Plaza on Main & 148<sup>th</sup>.

All data and reasons that support the conclusion that more retail/commercial is needed should be included in the FEIS.

D. These should be explained:

1. On page 7-29, it's stated that the area along the study area's northern edge would continue to provide a mix of retail services in lower scale buildings. Development intensities would not exceed what currently exists; therefore, these uses would remain compatible with adjacent and nearby residential and commercial uses to the north in "the Bridle Trails Neighborhood". On page 9-5, the existing scale of the built environment is described as "medium to medium large". On 7-29, the redevelopment would be "in lower scale building".

2. The existing buildings are predominately one story. How is redevelopment to achieve a lower scale building than exists.

3. The statement of lower scale and development not exceeding what currently exists essentially locks in land values, while the values in the rezoned area rises. Freezing land values along 520 favors selective transfer of property.

4. The existing buildings are primarily one-story and over 600 ft. away from Bridle Trails. This exceeds the LI setbacks in other areas of the City. There are two-story buildings on the south side of 24<sup>th</sup> across the street from Bridle Trails.

5. The idea that the rezone is to have this LI remain compatible with GC is puzzling. The landscape provisions allow the 6 ft. of side line landscaping to be relocated between LI & GC. If these uses are so incompatible, why is that provision in the landscape requirements?

E. The third paragraph on page 2-13 stated "This area -- which is not in the vicinity of a LRT station or surrounded by proposed higher intensity development...".

"...not in the vicinity or surrounded by proposed higher intensity development" applies to other areas. Essentially that says if the area is ¼ mile or more from an LRT station or surrounded by proposed higher intensity development. There are many other areas that are just as far from an LRT station and not surrounded by higher intensity development, but were not shown retail/commercial. The reasons for these rezones should be explained fully, with logic, and shown that the logic is uniformly applied.

F. The cost of land along the proposed 16<sup>th</sup> route should be much higher as the land use plan shows a much higher density. This would increase the cost of acquiring this land for 16<sup>th</sup> and the LRT route, because the highest and best use would indicate more land value. Wouldn't it make more sense to down zone the property where land is needed for the LRT on 16th?

G. Many of the uses permitted in the GC zone are also permitted in the LI zone, if located in a multiple function building or complex. What is the need that requires a GC zone that could not be accomplished in the LI?

Sincerely yours,



Michael H. Yuhl

Michael H. Yuhl  
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March 12, 2007

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

Re: Bel-Red DEIS Stream Impact

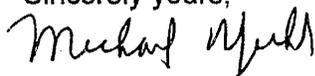
Dear Ms. Helland:

The three alternates shown in the DEIS all utilize the same alignment on 16<sup>th</sup>. The fundamental purpose of the EIS process is to explore a range of options which could eliminate or mitigate the proposal's impact on various components of the environment.

Extending 16<sup>th</sup> westward on Figure 1 of the Herrera inventory reveals that alignment will impact approximately 400 ft of the west tributary west of 127<sup>th</sup> bridge.

Even though this is a non-project EIS, I believe the FEIS should not show an impact that cannot be constructed without an impact on the stream and/or buffer. I believe the FEIS needs to discuss avoiding the impact by either relocation or elimination of this crossing.

Sincerely yours,

  
Michael H. Yuhl

**Helland, Carol**

---

**From:** Renay Bennett [renaybennett@msn.com]  
**Sent:** Thursday, March 08, 2007 6:58 AM  
**To:** Helland, Carol  
**Subject:** Re: DUE March 12 - Bel Red DEIs comments

Thanks for the note Carol.  
Renay

----- Original Message -----

**From:** CHelland@bellevuewa.gov  
**To:** renaybennett@msn.com  
**Cc:** KMcDonald@bellevuewa.gov ; KONEill@bellevuewa.gov ; MPaine@bellevuewa.gov  
**Sent:** Wednesday, March 07, 2007 9:27 PM  
**Subject:** RE: DUE March 12 - Bel Red DEIs comments

Renay - I am in receipt of your comments on the Bel-Red Corridor Project DEIS.

*Carol V. Helland, Land Use Director  
City of Bellevue  
Dept. of Planning & Community Development  
PO Box 90012  
Bellevue, WA 98009-9012  
425-452-2724  
Fax: 425-452-5225  
chelland@bellevuewa.gov*

---

**From:** Renay Bennett [mailto:renaybennett@msn.com]  
**Sent:** Wednesday, March 07, 2007 5:39 PM  
**To:** BelRed@bellevuewa.gov  
**Cc:** Helland, Carol  
**Subject:** DUE March 12 - Bel Red DEIs comments.

[http://www.bellevuewa.gov/pdf/Transportation/Ch11\\_PublicServicesandUtilities.pdf](http://www.bellevuewa.gov/pdf/Transportation/Ch11_PublicServicesandUtilities.pdf)

Subject: DEIS for Bel-Red Corridor Study comments

This DEIS is wholly insufficient and fatally flawed in its analysis with regard to increased needs of future housing and commercial development and their impacts in and around the Bel-Red corridor and the city as a whole. It is concerning that this analysis exhibits so little care for the public safety.

Electrical Power.

The DEIS fails to identify what planned facilities may need to be built to accommodate future increased development and rezoning, only hazily mentioning the need for it, if needed. The locale of such a transmission switching stations and distribution substation, along with their associated transmission lines and distribution circuits is stated to be somewhere near 520, between 135th and 140th. This could be in or near residential areas,

which would be not be able to be mitigated and would probably be heavily opposed by residents.

#### Water.

The DEIS fails to address increased water usage that will result from the proposed increases in development in the Bel-Red corridor. The system that is there is insufficient to provide water to any real level of increased residential or commercial development. Though there is a scheme via the Cascade Water Alliance, this group will not be able to provide clean drinking water to these new developments as the Cascade Water Alliance is trying to use human use and commercially contaminated water as drinking water. This will never pass muster with officials charged with public safety and those concerned with water quality and its effects on humans and animal life, including aquatic life. As a member of the Downtown Implementation Plan, I specifically asked for plans to provide clean water for the new development in the downtown. No such action was taken.

#### Fire Protection and Emergency Medical Services.

The analysis of future needs for fire service is fatally flawed. The proposals for increase in development would necessitate a new fire station. One need only look how this need is most evident in a redevelopment and upzone scenario as is occurring in the Bellevue downtown. Significant growth in the form of high rises is occurring without the fire support that is needed to address the special requirements needed to continue Bellevue's tradition of 6 minute response time. This is dangerous to the residents of Bellevue. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

With increased multi-family development and commercial development comes crime, as evidenced in the Bellevue downtown. No planned new additions of police personnel to keep residents and properties safe from criminals shows a fatally flawed approach to this analysis, as well as disdain for residents and property owners safety.

#### Schools.

This analysis is fatally flawed. As has been evidenced in the Bellevue downtown, new families moving in are putting tremendous pressure on our local schools. No property is planned for schools in this area, yet massive multi-family development is planned - and these folks will definitely have children. The analysis states that "District enrollments are based on past actual enrollment and do not routinely factor in new housing units, except as children of new residents are enrolled. There are no schools located in the Bel-Red Corridor study area." This is proof of the un-intelligent mis-reasoning that is evidenced throughout this analysis. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

I have limited my comments to the issues above, however, there are many more instances of fatally flawed analysis. It is a shame that this is costing the taxpayers of Bellevue so much - and who will receive no benefit. The No-Action alternative must be chosen. The residents and taxpayers of this city deserve to be protected from the encroachment and unmitigated impacts that will occur with the other alternatives - and the only way to do this

is for the council to choose the No-Action alternative.

Respectfully submitted,  
Renay Bennett

faxed 3/8/07  
452-5247

Please email me verification  
of receipt (address below)  
4 pages total

TO: City of Bellevue

3/4/2007

From: Heidi Benz-Merritt, 20 year resident of Compton Glen  
3006 130<sup>th</sup> Place NE, 98005 [heidibenz@verizon.net](mailto:heidibenz@verizon.net) (425) 883-8856

Heidi Benz-Merritt

RE: Comments for inclusion into FEIS for BEL-RED CORRIDOR PROJECT, NO ACTION  
ALTERNATIVE RECOMMENDATION

It appears that the underlying rationale for conducting this environmental study, is to justify an massive upzone of the Bel-Red business corridor, with the objective of influencing the location of a new fixed-rail line and the related transit stations. Not only does this contradict the axiom learned in "Planning 101" - that Land Use Drives Transportation", but there is no demonstrable need (social, political, economic or otherwise) that this huge build out is needed now- or 20 years in the future.

**NO ACTION** should be the **PREFERRED ALTERNATIVE**, with rationale, and DEIS deficiencies listed below.

## 1. HOUSING (Chapter 8)

This section is devoid of any useful data, and needs to include essential information regarding the City's progress on meeting our housing targets mandated under the Growth Management Act. Kevin O'Neill, Bellevue City Long-Range Planner, cites the following figures in an email dated 3/1/2007:

"The housing target in the current comp plan for the period 2002 to 2022 is 10,177 new households. Since the beginning of 2001, there have been 1,296 net new housing units constructed in Bellevue. However, there are another 2,000+ units in various phases of construction in Bellevue (most of them obviously in downtown), which, depending on when they are completed, would put us much closer to staying on target."

Given these data, there are at least 3300 new housing units built, or currently under construction in the first 5-6 years of the 20 year planning period through 2022. This represents about ONE THIRD of the projected target of 10,177 new units, in less than ONE THIRD (6 years) of the 20 year time span. In other words, Bellevue is AHEAD of its housing targets, and is far ahead of many of the surrounding communities on the Eastside (Extrapolating the data using the 2030 horizon year would presumably yield the same results).

GMA housing targets aside, Housing/Economic forecasts past 3-4 years are fraught with error, and give little more than a Ouiji-Board guesstimate of future market conditions. In short, numerous factors outside the City's control will dictate how much, when, and in what location future housing will be built.

Existing residential zoning already exists to accommodate future growth in Bellevue. The Housing Policies (HO-2,11,13,25 on pages 84 and 85) are already being implemented all around the City. To include them in this document gives the erroneous impression that somehow we need to allow housing into the Bel-Red area – so that we can comply with existing policies. The opposite is true, since housing targets have been met or exceeded – WITHOUT adding even one residential unit to the Bel Red area.

- a. DELETE these housing policies from the DEIS, since they are not supported by existing Bellevue Comp. Plan.

- b. ADD thorough discussion of GMA housing targets, and historical discussion of how Bellevue's housing growth has compared to other eastside communities (parity).
- c. ADD historical discussion as to why Bellevue Comprehensive Plan promotes/encourages new housing concentrated in the CBD, Crossroads, and existing residential areas, rather than in Bel Red. The DEIS alludes to this, but falls short in providing any historical context in this one sentence: *"The Bel-Red/Northip Subarea Plan (of the Bellevue Comp Plan), does not include a household growth target."* Page 84
- d. **Microsoft is in Redmond**, and housing growth, mixed use development, and construction of amenities (parks, trails, local rail infrastructure) to support that growth should occur, and be paid for, by Redmond, not Bellevue. Bellevue has already been very generous in the "foreign aid" department, and Redmond's turn to pay its fair share - is long overdue.

## 2. ECONOMICS (Chapter 8)

The discussion of Economic impacts also totally misses the mark, and is devoid of any substantive information to support getting rid of the existing zoning in the Bel-Red/study area. Instead, this section is filled with tables of irrelevant job/employment job growth numbers extrapolated from 30 year government projections from PSRC, and a rather unbalanced, biased discussion of a "market analysis of the Bel-Red corridor commissioned by the City.

*"by 2030, the (Manufacturing) sector is expected to decline by 18% or 1500 jobs". P.8-6. With mechanization, outsourcing, and the global economy, this misleading statement brings to mind the teenage retort: "DUH...!"*

REPLACE this statement with relevant data about Manufacturing/Warehouse businesses in the Bel-Red study area. These data should include at least the following:

- A. The number of Manufacturing and warehouse-dependent businesses in Bel-Red, total/projected payroll, current and projected tax revenue numbers. Why use goofy 30 year projections, when actuals are available from businesses already operating in the study area?
- B. Discuss and compare current and projected City B&O, utility tax, sales tax, property tax, and other revenue obtained from existing businesses in entire Bel-Red study area with preferred NO ACTION and other alternatives. *Obviously, the City has all these economic data, and its conspicuous absence from this document bodes the question: Why has it all been left out?*
- C. For each of the Alternative Scenarios, calculate the LOSS of payroll, and other tax revenue to City, etc. for these existing businesses, that would no longer be permitted uses.
- D. Discuss actual expansion requirements (land needs, transportation access, location to customers, other suppliers,) that existing businesses need in order to continue operating, and where they would find these, if made to leave Bel-Red.
- E. Analyze/report indirect economic impacts. This should include survey data from every manufacturing/warehouse-dependent businesses currently in Bel-Red - to include questions such as: "Can you afford to pay higher taxes and keep your business in Bel-Red, should your existing location be upzoned?" "If your business's underlying land-use is changed, will your business close? Relocate? If so, where, and at what (\$\$\$\$) economic cost? "Would your business be able to absorb the costs of relocation, and if so, how would you absorb/pay for these costs (i.e. higher prices for goods/services)?"
- F. Economic (tax/payroll, etc.) impacts of losing LI/warehousing/truck-trade companies. (Even if existing LI businesses are grandfathered in, the very "market forces this study aims to control - will eventually force them all out anyway.

- G. New and adverse Transportation/Environmental/Economic impacts to City residents and businesses forced to travel greater distances (outside the city) – to conduct business with car repair, home remodeling, service businesses, who would be forced out under all but the NO ACTION alternative.
- H. Financial liability that the City may have to existing businesses who would be forced to relocate or close.
- I. Cumulative Economic impact of homogenizing commercial land-uses in the City. In other words, ADD discussion of the economic impacts of losing this unique mix of businesses. (Bellevue's Light Industrial Zone, Manufacturing and lower-cost warehouse/retail parks all serve a huge geographical area. Not only does this area provide essential and diverse commercial businesses, it is virtually the only centralized area in East King County where rents are affordable for incubator, mom-and-pop, and start-up businesses.) Add in discussion on how City plans on keeping these businesses, and at what financial cost?
- J. ADD discussion about precedent for rezoning without "economic need". In other words, government involvement in "redevelopment" outside CBDs has historically centered on imminent domain cases, when a compelling governmental/state's interest exists. *No such compelling interest exists in this case.*
- K. ADD chart, and discussion on economic viability of existing business in the Bel-Red area. Add in discussion about why existing businesses are locating /staying in the Bel-Red corridor. *Market forces should guide economic growth – not the hubris of governmental agencies or pressure from commercial land developers.*

Clearly, this cursory Economic "discussion" doesn't cover economic impacts at all! One could easily conclude that the reason no evidence to support these sweeping land-use changes is presented – is simply because no evidence exists. Certainly the Bel Red business and property owners that testified at the DEIS hearing February 15, 2007, were adamantly against these sweeping changes to the Bel-Red commercial area. *They seemed to be all saying the same thing: "Leave it like it is, and let us continue to do business in the LI/commercial zone" "If it aint broke, don't fix it."*

### 3. TRANSPORTATION (Chapter 10)

The major factor driving this entire process isn't the need to change the Land Uses in the area, but rather the City's desire to influence if/where Sound Transit locates east of the CBD. But even if voters approve extension of Light Rail east to Redmond, (and that is a huge IF), the exact (proposed) locations will not be known until well after this process is complete. Given these uncertainties, and numerous factors outside the City's control, it seems premature to place so many assumptions in this document on a new transit corridor – to be built where no road currently even exists (proposed NE 16<sup>th</sup> Street).

At best, the decision to predicate much of this DEIS's Transportation discussion on the assumption that Light Rail will be located along this non-existing ROW violates a basic tenant of Planning: that "LAND USE DRIVES TRANSPORTATION".

In this case, City staff have turned what they learned in Urban Planning school upside down, so that now – transportation will drive land-use. In effect, this transportation impact discussion requires us to make a huge and expensive leap of faith: *We're sure that we can get LIGHT RAIL along NE 16<sup>th</sup>, Oh, by the way – to justify that, we'll need to require 1000s of new housing units and mixed-used development into Bel Red. Not only that, this new mini-CBD*

*will complete with our current Downtown in both housing, office and retail. Oh, we almost forgot – you all will get to pay for it! And it will be pricey.....*

With expected Light Rail projects delays and cost over runs, building a fix-rail project that is cost-effective is critical. Transportation analysis should include the following:

- A. Cost analysis of ROW acquisition for NE 16<sup>th</sup> corridor.
- B. Cost comparison figures for Light Rail along NE 16<sup>th</sup> to Redmond - compared to Light rail along SR 520, NE 8<sup>th</sup>, or Bel Red Road .
- C. Travel times expected for Light Rail users traveling between Microsoft/points east and downtown Bellevue/Seattle with the 4 alignments in B. above.
- D. Comparison of Travel times in C. with bus and SOV travel times for all 4 alignments.
- E. Analysis of traffic impacts and mode splits (SOV, HOV, Bus, Rail) for all 4 potential Rail alignments in B.
- F. Ridership projections on all nodes with cost per trip data on all 4 potential Rail alignments in B.

With the potential for several million additional square feet of office/retail and housing proposed in this DEIS, there is no meaningful data on traffic impacts to the surrounding neighborhoods.

- G. ADD in traffic data, comparing Level of Service data for NON-SIGNALIZED intersections, which is measured as the amount of (waiting) time it takes to go through a stop-sign controlled intersection (i.e. NE 24<sup>th</sup> at 134<sup>th</sup>). Current traffic data only looks at **signalized** intersections, and traffic volumes on streets – not the length of time it takes for us to enter/exit our neighborhoods. This analysis should be done for all surrounding neighborhood streets, including: NE 24<sup>th</sup> at 130<sup>th</sup> and 134<sup>th</sup>, and NE 132<sup>nd</sup> and NE 134<sup>th</sup> at NE 8<sup>th</sup> Street.
- H. Even though a current study of the North-South BN Rail ROW is underway, this should not be used as a rationale for not including substantive discussion on this potentially important and cost-effective Light-Rail line corridor. Its numerous advantages as a cost-effective corridor, and its potential for reducing PM Peak back-up congestion onto SR 520 should be discussed.

Although I have limited my comments to just the areas of Economic, Housing and Transportation, neighborhood impacts -particularly environmental impacts (traffic, noise, economic, aesthetic/view loss,) would be detrimental, and are non-mitigating. The NO ACTION alternative should be adopted by Bellevue City Council.

Thank you for this opportunity to comment, and please add my name as a Party of Record, and to your electronic and regular mail distribution list.



ST. ANDREW'S

Housing Group

2650 148th Ave SE • Bellevue, WA 98007 • Tel 425.746.1699 • Fax 425.746.2294 • www.sahg.org

March 8, 2007

RECEIVED

MAR 9 2007

Development Services

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

Dear Ms. Helland:

We are writing to make comment on the Environmental Impact Statement (EIS) for the Bel-Red corridor.

The EIS addresses four alternatives for growth in the corridor. All of the alternatives, except for the no action alternative, propose growth in housing development at different levels in the corridor. Regardless of the alternative chosen, it is our opinion that there needs to be a requirement that any new housing development in the corridor have a minimum 10% affordable housing requirement. Affordable housing applies to those individuals and families that make less than the area median income.

The need for affordable and workforce housing in Bellevue is significant and the failure to provide affordable housing, as outlined in the 2006 Bellevue Comprehensive Plan, will have an environmental impact on traffic and quality of life, as well as ability to sustain workforce housing in Bellevue, and most significantly, leaves no accountability for the stated goals you've outlined in your comprehensive plan, and neglects the needs of some of the most vulnerable citizens of Bellevue.

According to the 2006 Bellevue comprehensive plan:

*A major challenge for Bellevue and for other Eastside cities is to provide affordable housing opportunities for all economic segments of the population...According to Bellevue residents, affordable housing is an on-going issue.... Lack of affordable housing regularly ranks very high as a community problem in the city's biennial Human Services Needs public surveys... As of 2004, it is estimated that a three person household earning 100 percent of median income could afford to buy a typical home in only one out of nine Bellevue neighborhoods.*

The lack of affordable and workforce housing, coupled with increases in service related jobs in the downtown core, means that a large portion of Bellevue service

sector employees must commute. This includes teachers, childcare workers, bookkeepers, retail workers, bus drivers, administrative support staff, restaurant and salon workers whose salaries do not approach income levels needed to live anywhere in Bellevue. If Bellevue does not have public land use policies that create nearby housing opportunities for Bellevue's workforce, a significant environmental impact will occur as new traffic is added to already maximized transportation corridors.

The lack of affordable workforce housing in Bellevue has contributed to increases in traffic pressures on our major highways, the floating bridges and traffic in the downtown core. Planned future downtown development will worsen this problem. The creation of an affordable housing requirement for the development of the Bel-Red corridor will provide the only opportunity Bellevue has to establish nearby workforce housing for the downtown core and to help mitigate traffic congestion. Implementing an affordable housing requirement will also be essential to achieving goals within the comprehensive plan. According to the plan, the City has the following affordable housing goal:

***To aggressively pursue opportunities to preserve and develop housing throughout the city and the Eastside to meet the needs of all economic segments of the community***

and the following policy:

***POLICY HO-25. Ensure that affordable housing opportunities are not concentrated, but rather are dispersed throughout the city.***

We strongly urge that a minimum affordable housing threshold of 10% be established as a requirement to any new housing development in the Bel-Red corridor, both in order to mitigate the environmental impact related to traffic and to assure compliance with comprehensive plan goals and policy. Bellevue is emerging as a clear leader in our region for development, for quality of downtown living, for a retail core to rival the best in other major cities. How you incorporate affordable housing requirements in the Bel-Red corridor provides a tremendous opportunity for you to also step up to a regional leadership role in meeting this most fundamental and basic community need.

Sincerely,



**ST. ANDREW'S HOUSING GROUP**

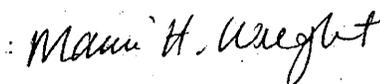
Mike Nielsen  
Executive Director

St. Andrew's Housing Group Board

Paul Dressel, Board President



Marni Wright, Board Vice President



Jim Long, Board Secretary



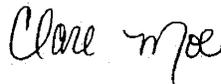
Jason Anderson, Board Treasurer



Linda Bergam, Board Member



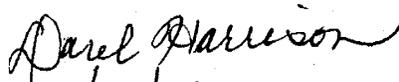
Clare Moe, Board Member



Eric Campbell, Board Member



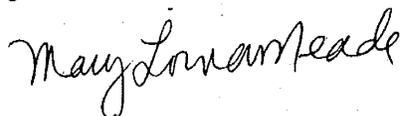
Darel Harrison, Board Member



Hal Ferris, Board Member



Mary Lorna Meade, Board Member

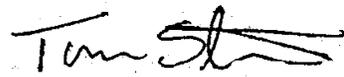


Patricia Parsons, Board Member



Tom Strain, Board Member

Lainey Alai-Malo, Board Member

A handwritten signature in black ink, appearing to read "Tom Strain". The signature is stylized with a large, sweeping initial "T" and a cursive "S".

Lainey C. Alai-Malo

RECEIVED

MAR 8 2007

Development Services

**JAMES I. KIMBROUGH**  
12224 N.E. 8<sup>th</sup> Street, Apt. 303  
Bellevue, WA 98005  
(425) 452 3093  
[jamkimbr@msn.com](mailto:jamkimbr@msn.com)

March 7, 2007

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

Re: Bel-Red Corridor Study

Dear Ms. Helland,

I have been unable to find anything in the planning for this revision of the Comprehensive Plan that addresses affordable housing, a problem that plagues every urban center in the nation.

This is an opportunity that very few communities ever get, to replan an area as large and central as the Bel-Red Corridor. It would be a real shame not to take some forward thinking steps in providing housing opportunities for those families who serve such vital functions in our society.

The economics of building affordable housing is always a challenge. The action of the city as expressed in planning and zoning has an enormous impact on those costs. I urge you to be sensitive to this need and make some provisions to enhance that part of the market.

Sincerely,



**McDonald, Kevin**

---

**From:** Paul Burckhard [paulb@loziergroup.com]  
**Sent:** Wednesday, March 07, 2007 10:39 AM  
**To:** BelRed  
**Subject:** Bel-Red Corridor Comments

March 7, 2007

Comments on Bel-Red Corridor Draft EIS

From: Paul Burckhard  
13252 NE 47<sup>th</sup> St  
Bellevue, WA 98005

After studying the draft EIS I would favor the NO ACTION alternative for the following reasons.

The Bel-Red Corridor is a unique mix of small businesses, light industrial, retail and office uses providing needed services for the residents of Bellevue that cannot be found in other parts of the city.

I am concerned that implementation of alternatives 1, 2 or 3 and the resulting zoning changes would eventually force many of these businesses out of this area as there is no other land within the city for them to locate, and even if there was, the cost to do so would be prohibitive. This would result in Bellevue's residents having to drive to outlying areas-Woodinville, Renton, Issaquah or Seattle-to find the business and services currently provided in this corridor and the loss of many small family owned businesses.

The changes proposed in the 3 alternatives seem to be driven by the assumption that a light rail or transit corridor will some day be located in this area. I would question the reasoning behind running a future transit line through the middle of the Bel-Red Corridor rather than following an existing ROW such as Bel-Red Road or NE 20<sup>th</sup> St, potentially disrupting fewer existing businesses. If the transit corridor is developed as shown in the proposed alternatives, with higher density residential development occurring along it's route, this will surly result in the demise of many of the existing businesses in the area as they would not be deemed compatible with residential development.

Certain changes in the 3 alternatives make sense such as the expansion of medical offices along the north 116<sup>th</sup> Ave corridor and additional office parks in the area of Safeway and along Bel-Red road if and when these properties become available for redevelopment, but these changes can be accommodated within the existing zoning or with minor changes to the current zoning.

The other concern that I have as a resident of the surrounding community is the impact of increased traffic that would result from implementing any of the 3 alternatives. To date, the city's efforts at reducing cut through traffic in the neighborhoods to the north of this corridor have not had much impact and bringing additional residents into this area will only increase traffic in these neighborhoods.

Certainly a lot more study on the real impacts of these proposals on the existing business and surrounding residents needs to be done before any changes are implemented.

**O'Neill, Kevin**

---

**From:** Renay Bennett [renaybennett@msn.com]  
**Sent:** Wednesday, March 07, 2007 5:39 PM  
**To:** BelRed@bellevuewa.gov  
**Cc:** Helland, Carol  
**Subject:** DUE March 12 - Bel Red DEIs comments

[http://www.bellevuewa.gov/pdf/Transportation/Ch11\\_PublicServicesandUtilities.pdf](http://www.bellevuewa.gov/pdf/Transportation/Ch11_PublicServicesandUtilities.pdf)

Subject: DEIS for Bel-Red Corridor Study comments

This DEIS is wholly insufficient and fatally flawed in its analysis with regard to increased needs of future housing and commercial development and their impacts in and around the Bel-Red corridor and the city as a whole. It is concerning that this analysis exhibits so little care for the public safety.

#### Electrical Power.

The DEIS fails to identify what planned facilities may need to be built to accommodate future increased development and rezoning, only hazily mentioning the need for it, if needed. The locale of such a transmission switching stations and distribution substation, along with their associated transmission lines and distribution circuits is stated to be somewhere near 520, between 135th and 140th. This could be in or near residential areas, which would be not be able to be mitigated and would probably be heavily opposed by residents.

#### Water.

The DEIS fails to address increased water usage that will result from the proposed increases in development in the Bel-Red corridor. The system that is there is insufficient to provide water to any real level of increased residential or commercial development. Though there is a scheme via the Cascade Water Alliance, this group will not be able to provide clean drinking water to these new developments as the Cascade Water Alliance is trying to use human use and commercially contaminated water as drinking water. This will never pass muster with officials charged with public safety and those concerned with water quality and its effects on humans and animal life, including aquatic life. As a member of the Downtown Implementation Plan, I specifically asked for plans to provide clean water for the new development in the downtown. No such action was taken.

#### Fire Protection and Emergency Medical Services.

The analysis of future needs for fire service is fatally flawed. The proposals for increase in development would necessitate a new fire station. One need only look how this need is most evident in a redevelopment and upzone scenario as is occurring in the Bellevue downtown. Significant growth in the form of high rises is occurring without the fire support that is needed to address the special requirements needed to continue Bellevue's tradition of 6 minute response time. This is dangerous to the residents of Bellevue. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for

this purpose. No such action was taken.

With increased multi-family development and commercial development comes crime, as evidenced in the Bellevue downtown. No planned new additions of police personnel to keep residents and properties safe from criminals shows a fatally flawed approach to this analysis, as well as disdain for residents and property owners safety.

Schools.

This analysis is fatally flawed. As has been evidenced in the Bellevue downtown, new families moving in are putting tremendous pressure on our local schools. No property is planned for schools in this area, yet massive multi-family development is planned - and these folks will definitely have children. The analysis states that "District enrollments are based on past actual enrollment and do not routinely factor in new housing units, except as children of new residents are enrolled. There are no schools located in the Bel-Red Corridor study area." This is proof of the un-intelligent mis-reasoning that is evidenced throughout this analysis. As a member of the Downtown Implementation Plan, I specifically asked for property that would be used for this purpose. No such action was taken.

I have limited my comments to the issues above, however, there are many more instances of fatally flawed analysis. It is a shame that this is costing the taxpayers of Bellevue so much - and who will receive no benefit. The No-Action alternative must be chosen. The residents and taxpayers of this city deserve to be protected from the encroachment and unmitigated impacts that will occur with the other alternatives - and the only way to do this is for the council to choose the No-Action alternative.

Respectfully submitted,  
Renay Bennett

RECEIVED

MAR 8 2007

Development Services

March 6, 2007

Carol Helland, Environmental Coordinator  
City of Bellevue Department of Planning & Community Development  
PO Box 90012  
Bellevue, WA 98009-9012

RE: Comments on DEIS for the Bel-Red Corridor Project

Dear Carol:

This letter represents comments from the ownership of two properties within the study area as follows which are owned by various McNae family members:

1. Sherwood Shopping Center anchored by Trader Joe's, 15400 NE 20<sup>th</sup>.
2. McDonald's located at 13841 NE 20th.

We have reviewed the DEIS for the Bel-Red Corridor Project. We support Alternative 3 as we believe it would provide the highest and best use for the study area going forward. We support the concept of a mixed use zoning for the area that includes the Sherwood Shopping Center, provided that such zoning is an elective overlay that permits the existing underlying zoning for continued use and future redevelopment.

In reviewing the DEIS we note that there are a number of road improvements called for including street widening, turn lanes and the addition of bicycle paths and lanes. Some of these improvements are indicated in Figure 2-2. We would appreciate additional clarification, information and involvement so that we can fully understand how these improvements would affect access and use of the above referenced properties. In the case of Sherwood Center it is vital that access points to the property remain and not be hindered to retain a successful neighborhood shopping center serving the local community. The major tenants to the property require the existing access and in some cases have the option to terminate their lease and leave the shopping center if the existing access is eliminated or reduced. Therefore on traffic matters, we ask that for our properties that we be engaged directly prior to the development of final traffic revisions.

Sincerely,



Don Pickens  
President  
Agent for Sherwood Shopping Center and McDonald's

**BILLY-JOE PARK, LLC**

P.O. Box 261  
Medina, WA 98039  
(425) 454-3775  
Fax: (425) 454-3794

March 1, 2007

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

**Hand Delivered**

**RE: 1000 124<sup>TH</sup> AVENUE N.E.**

Dear Committee Members:

We own an office building located at the above address, which is the southeast corner of Bel-Red Road and 124<sup>th</sup> Avenue N.E. Because we have owned this property for approximately eight (8) years, we have suffered through the problems created by the lack of appropriate zoning along Bel-Red over the years, which has been a neglected but important part of the City of Bellevue. We have been anxiously awaiting the long-anticipated re-zoning of this corridor. Accordingly, we both applaud and support your considerable efforts to make sense of the land use along this important corridor.

However, we take serious exception to the study's almost exclusive focus on the north side of Bel-Red, to such an extent that it is a misnomer to characterize it as a study of the *corridor*. We specifically object to the characterization of our property as being suitable for low density office or housing/office as part of a transition area in the three alternative plans under consideration.

Although certain properties along the south side of Bel-Red may, due to their configuration and uses of adjacent properties, be appropriate for transition zone restrictions, a cursory review of our property indicates that it should be treated differently. Unlike most properties, a public street (N.E. 10<sup>th</sup> Place) is located along our southerly boundary. In addition, the existing uses to the south are either high-density multifamily or office. As a result of these somewhat unique factors, our property – which has the potential for completing an important intersection along the corridor – should not be subject to the limitations or development proposed by the development plans currently under consideration.

We urge you to re-evaluate the intensity of development proposed for our property, as well as the Sternoffs' adjacent property to the east. Especially because we have anxiously awaited the re-zoning of our property over the years, you can be assured that we will vigorously oppose any development proposal which arbitrarily and unnecessarily restricts our ability to re-develop this critical property.

Bel-Red Corridor Steering Committee  
March 1, 2007  
Page 2 of 2

Please contact me if you wish to discuss this further.

Sincerely yours,



William C. Summers

cc: Bob Sternoff  
Kevin O'Neill  
Kevin McDonald

**O'Neill, Kevin**

---

**From:** JGFerrell@aol.com  
**Sent:** Tuesday, February 27, 2007 3:08 PM  
**To:** BelRed  
**Subject:** BelRed corridor zoning

As 40 year resident of East Bellevue, I wish to add my comment on the zoning option preferred for the BelRed corridor. My choice echoes the request from many residents of Bridle Trails community, preferring "No action alternative because "the current light industrial zoning in the corridor is the most conducive use with the neighborhood". I use a lot of these businesses and don't want to have to drive long ways to find similar ones.

Submitted by: Clara Ferrell  
16204 NE 6th St  
Bellevue, WA 98008-4332

---

AOL now offers free email to everyone. Find out more about what's free from AOL at [AOL.com](http://AOL.com).

**O'Neill, Kevin**

---

**From:** Lesdoc@aol.com  
**Sent:** Monday, February 26, 2007 12:56 PM  
**To:** BelRed  
**Subject:** Bel-Red Corridor Project

We live in the area affected and feel the "no action" alternative is the best use. The businesses in the area serve us well and should not be squeezed out by higher density and the accompanying higher taxes.

The traffic in the area is just manageable now. The changes suggested in the alternatives would create over crowding the area streets, becoming to much like downtown.

Again, we request no action alternative for the Bel-Red Project.

Lucille H Harms  
G. Lester Harms  
14468 NE 12th Pl.  
Bellevue

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COUNCIL  
PCD PLANNING  
TRANSP PLANNING  
cc: CMO  
CCO

26 February 2007

City Council  
City of Bellevue  
Bellevue, Washington

Subject: Bel-Red Corridor Project

RECEIVED

FEB 26 2007

CITY COUNCIL

Dear Council Members;

At your 20 February 2007 study session, staff members and a member of the Bel-Red Corridor steering committee provided a brief update on the Project, and the recently-released draft environmental impact statement (DEIS) for the Project. I was disappointed, but not surprised, that the City's environmental coordinator was not invited to give you a summary of the comments from the public hearing on the DEIS. It was equally disappointing that none of you thought to ask for such a summary; but, in the best traditions of citizen civic responsibility, I will attempt to remedy that deficiency by forwarding via email a summary from my own notes of the comments made to the hearing officer.

There are a number of fundamental problems with this very expensive and unnecessary project and its recently released DEIS:

1. The so-called 'market analysis' done by one of the City's consultants (Leland Consulting Group) was published first on 25 October 2005, and re-released with a few minor changes in March 2006. Leland's reports are, for the most part, a collection of materials that are not specifically related to the Bel-Red Corridor area, are poorly documented with references, and poorly rationalized. For example, the projected retail floor area "demand" is derived from a tabulation (Table 7) of PSRC population forecasts for 8 FAZs (forecast analysis zones), only two of which are directly applicable to the Corridor. (The report states that the 8 zones encompass an area with a 3-mile radius centered at approximately the Bel-Red Road and 130th NE, with the Bel-Red corridor expected to capture 25-33% of the total retail demand in the 8-zone area.) Whether such a large area (28 square miles), and Leland's simplistic demand calculation is a useful basis to forecast retail floor area in the Corridor is certainly doubtful. There are many forecasting models that can be used for such an analysis; see some examples in the attachment.

Leland's report also represents that "improvement ratios" can be used to rationalize the need to rezone an area to more intense use (see page 6 of the March 2006 report). The report states that a ratio of 75% or higher confirms that a property is being used at its "highest and best use." The report offers no justification for this assertion, and even a modest literature search cannot confirm such a wild and wooly claim. Improvement ratios for properties in the Bel-Red Corridor vary quite significantly, depending on the property, and as a function of time: see the attached figure and table.

2. The DEIS does not disclose the potential costs associated with the very extensive transportation and utility infrastructure, and public amenities (parks, open space, etc.) required for the Action Alternatives.

3. The DEIS does not adequately or accurately describe the likely development of the Corridor under the No-Action alternative because it fails to account for the wide variety of permitted uses in the Corridor under the existing Bel-Red/Northrup sub-area plan and zoning, and any likely changes that property owners might propose if the Project alternatives do not occur.

4. The DEIS should clarify its characterization of Sound Transit's plan to deploy light rail transit as part of the East Link Project, especially to note that one route to be examined in Sound Transit's East Link EIS is along SR520. The DEIS also needs to revise its LRT station locations to coincide with the station locations shown by Sound Transit's documentation for the East Link Project.

5. The DEIS does not explain the rationale or objectives for the proposal, especially with reference to the City's Buildable Lands Report, and presentations made to the Bellevue Planning Commission in September 2004. The City's Buildable Lands Report and subsequent staff analyses concluded that there was no need to change the City's Comprehensive Plan or rezone additional properties to higher densities or intensities to accommodate the City's 20-year growth targets.

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

7. WAC 197-11-060(3)(iii) and WAC 197-11-442(4) state that nonproject proposals should be described in terms of *objectives*, rather than preferred solutions; and discussion of alternatives for a comprehensive plan EIS's for nonproject proposals shall be limited to a general discussion of the impacts of the proposal. The published DEIS goes far beyond these requirements, and provides excessive and unsupported detailed rationale and data based on unsupported, or very limited studies performed by City consultants.

The DEIS does not define or rationalize any specific *objectives* for the Bel-Red project; rather, there are a set of broad, but ill-defined "goals" established by the Bellevue City Council that were not subjected to any public review or input. The DEIS should be revised to identify the specific objectives of the proposal.

Although not required by the WAC, the DEIS should be revised to include a reasonable life cycle cost estimate for the construction, operation and maintenance of the various transportation and other supporting public infrastructure that would be required for the no-action alternative and each action alternative.

8. The DEIS vastly overstates the extent of public and business/property-owner participation in the development of the three action alternatives, and for the project as a whole. There was very limited input from a broad range of Bellevue citizens, and only limited input from very few business/property owners. In addition, neither the City nor the Project Steering

Committee ever allowed the public or business/property owners to make presentations to the Steering Committee, thus insulating the Committee from differing views of possible alternatives to the City's proposals, or rebutting the information provided to the Steering Committee by the City staff and the City's consultants. (This point was made by a number of persons who testified at the public hearing on 15 February.)

9. Much of the material in the DEIS cannot be verified by careful review and evaluation because of inadequate disclosure of sources and methodology. In addition, there appears to be omissions and conflicts between information in various sections of the DEIS, especially in the chapters dealing with watershed processes, noise, transportation, and utility services. The material and conclusions in the chapter on transportation impacts is virtually unverifiable, and uses difference metrics and models than traditionally used by the Bellevue Transportation Department.

10. I urge to your particular attention the fact that this non-project-proposal DEIS is conspicuously lacking any summary of the proposed changes to the City of Bellevue's Comprehensive Plan, the Bel-Red/Northup Subarea Plan, the Crossroads Subarea Plan, the Wilburton/NE 8th Street Subarea Plan, and the Bellevue City Code. Because proposed changes to these plans and the City Code are not defined in the DEIS, there is no way to be sure that all possible impacts have been analyzed and defined. Moreover, the absence of these proposed changes prevents the public and reviewing agencies from clearly understanding exactly what is being proposed. I consider this condition to fatally flaw this DEIS.

I urge you to take a much more active interest in this Project, as it has very significant and costly implications for future citizens of our City. Although the project has a Steering Committee, the committee has no procedures, time, or interest in effectively communicating with Bellevue citizens regarding possible changes in land use within the Bel-Red Corridor, even though, according to the City's operating guidelines for the Committee, they were supposed to "... solicit input from the general public and other key community stakeholders." Likewise, there was no opportunity for public scrutiny or comment on the "goals" for the Project established by the City Council. Moreover, Committee membership was established in camera by the mayor and the deputy mayor, with no input from the other members of the City Council. Indeed, none of the Committee members live in reasonable proximity to the project area, and since they have not sought input from the general public, especially homeowners in nearby residential areas, the Committee's influence on developing alternatives for the Bel-Red Corridor consisted primarily of endorsing Staff and consultant recommendations.

Sincerely yours,

  
David F. Plummer

14414 NE 14th Place  
Bellevue, WA 98007

**Examples of equations for forecasting demand for retail floor space:**

**Equation 1:**

$$\text{Total Demand}_{\text{year } t} = - 5.986 + 4.556 \ln(\text{Local Population}_{\text{year } t-2}) + 7.845 \ln(\text{Visitor Retail Expenditure}_{\text{year } t})$$

**Equation 2:**

$$\text{Total Demand}_{\text{year } t} = - 8.179 + 6.329 \ln(\text{Visitor Retail Expenditure}_{\text{year } t}) + 4.947 \ln(\text{Working Population}_{\text{year } t-1})$$

**Equation 3:**

$$\text{Total Demand}_{\text{year } t} = 3.710 + 12.647 (\text{Retail Employment}_{\text{year } t}) - 5.451(\text{Average Retail Employment per Unit Floor Area}_{\text{year } t-1})$$

**Equation 4:**

$$\text{Total Demand}_{\text{year } t} = 2.858 + 38.654 (\text{Total Demand}_{\text{year } t-1}) - 3.197 (\text{Retail Property Price}_{\text{year } t})$$

**Equation 5:**

$$\text{Total Demand}_{\text{year } t} = - 16.632 + 6.190 \ln(\text{Visitor Arrivals}_{\text{year } t}) + 2.426 \ln(\text{Retail Sales}_{\text{year } t}) - 2.961 \ln(\text{Retail Property Price}_{\text{year } t})$$

**Equation 6:**

$$\text{Total Demand}_{\text{year } t} = - 8.862 + 6.923 (\text{Visitor Arrivals}_{\text{year } t}) + 10.004 \ln(\text{Retail Sales}_{\text{year } t}) - 5.406 (\text{Retail Property Price}_{\text{year } t})$$

where  $\ln$  = natural logarithm



**Table 7. Average Improvement Ratios for Selected Properties,  
Bell-Red Corridor**

Parcel No. (Note 6.)	Year 2007 Imp. Ratio Lnd@Ass.Val.	Year 2007 Imp. Ratio, Land@\$15/Ft	Avg. Impovm't Ratio for 1991-2007	See Note:	Zoning	Land Area, Acres	Year 2007 Land Assesed Value, \$/sq ft.
9010	0.6026	0.6322	0.4252	1	CB	10.17	\$17
9240	Vacant	Vacant	N/A	-	LI	3.32	\$14
0100	0.3479	0.2991	0.3795	2	LI	60.43	\$12
9007	0.3759	0.3252	0.4380	2	LI	8.14	\$12
9048	0.2669	0.2536	0.4151	3	LI	20.16	\$14
9003	0.7212	0.6915	0.7354	2	LI	3.16	\$13
9087	0.6992	0.6683	0.6265	2	LI	2.89	\$13
9091	0.4359	0.3820	0.4857	4	LI	1.22	\$12
9027	0.6129	0.5964	0.5173	5	LI	1.54	\$14
9063	0.5657	0.6227	0.4860	2	GC	2.01	\$19
9179	0.5762	0.5593	0.5736	2	LI	1.13	\$14
9191	0.6080	0.5914	0.4604	2	LI	1.63	\$14
9297	Vacant	Vacant	N/A	-	LI	4.12	\$20
0009	Park Lot	Vacant	N/A	-	GC	0.63	\$42
9190	0.5281	0.5863	0.5423	2	LI	1.07	\$19
9204	0.6200	0.6036	0.6709	2	LI	3.23	\$14
9066	0.3162	0.3694	0.2734	2	LI	1.09	\$19
9296	Wet Land	Wet Land	N/A	-	LI	7.14	\$13
9295	0.1795	0.1489	0.2196	4	LI	8.43	\$12
9026	0.2146	0.2032	0.2868	4	LI	16.47	\$14
0191	0.8598	0.8307	0.8456	2	GC	2.69	\$12
Averages	0.5018	0.4920	0.4930				\$17

Source: King County Assessor 2007 records for individual parcels.

Notes:

1. Average IR value for 1994-2007.
2. Average IR value for 1996-2007.
3. Average IR value for 1995-2007.
4. Average IR value for 1991-2007.
5. Average IR value for 1992-2007.
6. See Table 6 for name of parcel and assessed land/improvement values.

**O'Neill, Kevin**

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**From:** Mike Nielsen [miken@sahg.org]  
**Sent:** Monday, February 26, 2007 12:43 PM  
**To:** BelRed  
**Subject:** Bel-Red Corridor

My name is Mike Nielsen. I am a resident of Bellevue and the Executive Director of St Andrew's Housing Group, a non-profit developer and operator of affordable housing.

There needs to be a requirement that any new housing development in the corridor have a minimum requirement of 20% at affordable housing levels.

The lack of affordable and workforce housing in Bellevue is significant. Bellevue has fallen far short of its affordable housing goals. This does have an environmental impact and creates a significant impact on issues such as transportation and the quality of workforce attracted to work in our stores, schools and daycare centers. The lack of affordable and workforce housing, coupled with increases in service related jobs in the downtown core, means that a large portion of service sector employees must commute. Currently the median cost of housing in Bellevue is far beyond the reach of much of the workforce that is needed to sustain our community. This includes teachers, childcare workers, bookkeepers, retail workers, bus drivers, administrative support staff, restaurant and salon workers. If we do not have public land use policies that create nearby housing opportunities for our workforce we create an environmental impact through added traffic to already maximized transportation corridors.

The lack of affordable workforce housing contributes to increases in traffic pressures on our major highways, the floating bridges and traffic in the downtown core. Planned future development downtown will worsen this problem. Creating an affordable housing requirement to the development of the Bel-Red area will provide the only opportunity Bellevue has to create nearby workforce housing for the downtown core and to help mitigate traffic congestion.

Sincerely,

Mike Nielsen

**O'Neill, Kevin**

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**From:** Krista Perkins [kkrp@verizon.net]  
**Sent:** Saturday, February 17, 2007 2:52 PM  
**To:** BelRed  
**Subject:** Draft EIS

I am extremely disappointed in your ability to advertise the release of the DEIS as well as advertise the public hearing that you had on FEB. 15th

I just found out that it has been released - by reading the Bellevue Reporter - that was published on FEB. 17th. Notice the date difference.....

I commented and attended a meeting last year on this subject. You had my email address and could have - and should have contacted everyone who provided preliminary comments to let them know the document was out and that you were holding a public hearing.

And, I go on the web site and there is no information about how you can get a copy. I am unable to download all the information off of the internet. There is no easy access to where a DEIS can be picked up - or if there would be a cost associated with it (there shouldn't be by the way).

What a disappointment in your lack of attempt to involve the public! You should hold another public meeting with adequate PR - and extend your comment period. I will make sure that Department of Ecology is aware of the document release and make sure that they have a copy.....

Krista Rave-Perkins  
12403 NE 28th Street  
Bellevue, WA 98005

CITY OF BELLEVUE  
BEL-RED CORRIDOR PROJECT  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING  
MINUTES

February 15, 2007  
6:30 p.m.

City Council Chambers  
Bellevue City Hall

Land Use Director and Environmental Coordinator Carol Helland noted that she is responsible for the preparation of all environmental documents, including Environmental Impact Statements (EIS) under the terms of the State Environmental Policy Act (SEPA) and the city's Environmental Procedures Code. She explained that the Bel-Red corridor study is the subject of the Draft Environmental Impact Statement (DEIS) is a plan level EIS, otherwise known as a programmatic or non-project EIS. Accordingly, the document evaluates changes in planning documents, including potential Comprehensive Plan amendments, subarea plan amendments, and amendments to the Land Use Code. The non-project action will not provide entitlement to any specific project; further project-level review will be required at the time any application is submitted for future development.

Ms. Helland said the Bel-Red corridor study DEIS 45-day public comment period will end on March 12. In addition to providing comments during the public hearing on the DEIS, she invited the public to fill out the comment forms and mail them in, or offer comments via email. Ms. Helland asked those providing public comment to be as specific as possible regarding the adequacy of the evaluation, the methodologies used, the mitigation measures outlined, and any other relevant aspect. The Final Environmental Impact Statement (FEIS) will include a response to all comments received and may include modifications to the alternatives, entirely new alternatives, and/or supplemented information.

Ms. Helland declared the public hearing open.

Mr. Rich Wagner, Baylis Architects, 10801 Main Street, commented that the study appears to suggest that the line of demarcation is 156<sup>th</sup> Avenue NE. The fact is the commercial corridor continues past that point, as do the various uses. That factor should be addressed in the document. As drawn, the map makes it appear as though the transit node in that area is on the edge of the commercial district when in reality it is not given that the uses continue on into Redmond. At a minimum, that point should be addressed in the BROTS agreement.

Mr. Daryl Banks, Bellevue Auto Rebuild, 1424 130<sup>th</sup> Avenue NE, voiced concern regarding the possible changes in zoning. He said the businesses like his that are located in the corridor are needed in support of the car dealers in the area. The number of dealerships that have their own collision repair or auto body shops is very limited, thus the dealerships are very dependent on the independent shops and vice versa. In addition, the insurance companies with policyholders in the area are getting more aggressive with regard to convenience, thus they rely on the independent shops to take care of their customers. Comments have been made about having the garages and auto body shops move, but in fact there is no where to move to in the immediate vicinity. There has been a lot said about the need to improve the area for traffic, but little has been said about specific plans for either Bel-Red Road or Northrup even though the vision for the area calls for a lot of housing. Aside from side streets and intersections, the talk has been about light rail going through the corridor. He said a lot of small business owners in the area are counting on their

businesses and properties providing them with a retirement when the time comes, and the plans being made for the area may have a negative impact.

Mr. David Plummer, 14414 NE 14<sup>th</sup> Place, said he would also be submitting written comments on the DEIS. He said the DEIS does not adequately nor accurately describe the likely development of the corridor under the no action alternative in that it fails to account for the wide variety of permitted uses in the corridor under the existing Bel-Red/Northup subarea plan and zoning, and the likely changes that would occur instigated by property owners in contrast to the project action alternatives.

The DEIS should clarify the characterization of Sound Transit's plan to deploy light rail transit as part of the East Link project; it should especially note that one route to be examined by Sound Transit's East Link EIS is along SR-520. The DEIS also needs to revise the light rail transit station locations to more closely coincide with the similar vicinity locations shown by Sound Transit in their documentation for the East Link project.

The DEIS does not explain the rationale or objectives for the proposal, especially with reference to the city's Buildable Lands Report, and with reference to the presentations made to the Bellevue Planning Commission in September 2004. The Buildable Lands Report and subsequent staff analyses concluded that there was no need to change the city's Comprehensive Plan or to rezone additional properties to higher densities or intensities to accommodate the city's 20-year growth targets.

The City Council and the city's Comprehensive Plan have long espoused the theme that future employment and residential growth will be concentrated in the Downtown subarea. As proposed under the DEIS Alternatives 1, 2 and 3, approximately 2.4 to 4.5 million square feet of commercial development, 4700 to 9200 new employees, and 3500 to 5000 residential units, with a population of approximately 6300 to 8700, would create a wholly separated and isolated business and residential center. In spite of the expansive unsupported rationale in the DEIS, the three alternatives would constitute the creation of a small-scale city within Bellevue in direct conflict with the city's commitment to concentrate growth in the Downtown subarea.

The Washington Administrative Code states that non-project proposals should be described in terms of objectives rather than in terms of design solutions. The discussion of alternatives for a comprehensive plan EIS for non-project proposals is to be limited to a general discussion of the impacts of the proposal. The published DEIS goes far beyond those requirements and provides excessive and unsupported detailed rationale and data based on unsupported and very limited studies performed by city consultants. The DEIS does not define or rationalize any specific objectives for the Bel-Red project; rather, there is a set of broad, ill-defined goals established, or at least endorsed, by the Bellevue City Council that were not subjected to any public review or input. The DEIS should be revised to identify the specific objectives instead of the so-called goals for the proposal.

The DEIS should also be revised to include a reasonable life-cycle cost estimate for the construction, operation and maintenance of the various transportation and other supporting public infrastructure that would be required for the no action alternative and each action alternative.

The DEIS vastly overstates the extent of public and business or property owner participation in the development of the three action alternatives, and for the project as a

whole. There has been very limited input from a broad range of Bellevue citizens and only a limited input from very few business and property owners. In addition, neither the city or the project steering committee ever allowed public or business property owners to make presentations to the steering committee. Thus they were insulated from differing views of possible alternatives to the city's proposals.

Much of the material in the DEIS cannot be verified by careful review or evaluation because there is inadequate disclosure of sources and methodologies. In addition, there appear to be omissions and conflicts in the information in various sections of the DEIS, especially in those chapters dealing with watershed processes, noise, transportation, and utility services.

The information in Appendix H should be incorporated directly in Chapter 11. It is not stated why it was isolated as a separate chapter. It should include reference to Puget Sound Energy's long-range electric power generation source and natural gas supply plans.

Mr. Chris Mool, Crescentview Investments, 2211 156<sup>th</sup> Avenue NE, said he is a new landowner in the Bel-Red corridor, having recently taken ownership of Angelo's Home and Nursery Center. He said the opportunities for that site are exciting. It is good that the land at the very eastern end of the study area has been included; it holds opportunity for a gateway to the corridor. In developing the property, the focus will be on senior citizens and independent living. In addition, there will be a mixed use component that could include retail and other uses. The plan does not at the moment include much definition as to the types of uses that could fit into the mix; he said as he continues to explore his site he looks forward to offering the steering committee with observations regarding the development opportunities.

Ms. Cindy Ludwig, 12336 NE 24<sup>th</sup> Street, said the Bridle Trails Community Club will be submitting written comments at a later date. Speaking for herself, she voiced concern over the fact that nothing in the DEIS reflects the comments made by the Bridle Trails community at the public meeting held in June 2006. The current light industrial zoning in the Bel-Red corridor is the most conducive use with the Bridle Trails neighborhood; the use complements the Bridle Trails neighborhood. There are a lot of businesses there the residents use. The level of detail contained in the DEIS is not sufficient to determine if allowing the area to convert to retail and commercial uses would be a good idea or not. If the area is rezoned, the neighborhood will lose the opportunities it has had to comment on requests for variances to bring in different uses. Good decisions have been made in the past because of that process. Preliminarily, it appears the no action alternative will be best for the neighborhood. The transportation numbers listed in the EIS are suspect; the sources are not disclosed and the formulas used are not clear. The numbers appear to be understated and calculated to support the proposal. The Bridle Trails neighborhood experiences a lot of cut-through traffic on NE 24<sup>th</sup> Street and is not interested at all in the proposed exits and entrances at 124<sup>th</sup> Avenue NE and SR-520. There are just too many unknowns. If the basis of the study is to rezone the Safeway properties sensibly, that should be the focus rather than rezoning the entire corridor. There is no reason to make any other change to the corridor.

Mr. Greg Johnson with Wright Runstad, address not stated, said the company is under contract to purchase a portion of the Safeway property between 120<sup>th</sup> Avenue NE and 124<sup>th</sup> Avenue NE. He complemented the city on the DEIS in that it captures the vision of the steering committee and the public input offered to date. Wright Runstad is excited to be part of the process, which is utilizing solid planning principles. He encouraged the city to go as

far as possible in addressing impacts and mitigations, and in developing as much data as possible. In addition, the role of the city in providing the necessary infrastructure should be identified. The key will be in providing a clear and concise framework that will allow for predictability through 2030 so that when project-level environmental work needs to be done it will not be necessary to generate a lot more new data. The intent of Wright Runstad is to develop the old Safeway site with a state-of-the-art sustainable project that will respect what exists in the corridor currently and helps to realize the potential for the future.

Mr. Todd Woosley, co-owner of Briarwood Center at NE 12<sup>th</sup> Street and 120<sup>th</sup> Avenue NE in the western section of the Bel-Red corridor study area, said he has been following the process from the beginning. He noted his support for the programmatic EIS approach used, a method that will obviate the need for individual property owners to go through the process again and again. He agreed with the previous speaker that the city should pursue the generation of data to assure predictability for everyone involved. Within the next ten to twenty years it is possible that Briarwood Center will be redeveloped to a higher and better use. However, three of the four alternatives will result in no increase in the value of the property. Worse yet, a road is proposed to run through the middle of the property, something that was never communicated in all the conversations held with the city. Furthermore, the intersection that is shown to experience the largest increase in traffic is the main intersection that serves the tenants and customers accessing Briarwood Center. It is, however, early in the process and there is reason to be optimistic that as the process moves forward solutions will be found.

There are concerns with regard to the accuracy of some of the information included in the DEIS. The CH2MHill report talks about the need to acquire right-of-way. For the extension of NE 10<sup>th</sup> Street from 116<sup>th</sup> Avenue NE to 124<sup>th</sup> Avenue NE, the report indicates that up to two retail buildings, portions of an auto dealership and two warehouses might be impacted or displaced; in fact, closer to 20 properties will be impacted, and the assessed valuation of those properties is over \$46 million. The assessed valuation of the properties between 120<sup>th</sup> Avenue NE and 124<sup>th</sup> Avenue NE is over \$16 million. The city does not have the nearly \$80 million it will need to purchase the properties needed for projects that will likely not offer commensurate benefits for congestion relief in the area; the focus should be on a more practical approach. In addition, more information should be included with regard to mode splits, including the category of transit/walk, which needs to be separated out so it can be determined how each mode will affect the overall traffic picture in the Bel-Red corridor.

The accuracy, detail and accessibility of the information needs to be improved. The city should also seek to significantly refine its recommendations and bring in fiscal realities for transportation infrastructure as well as market realities for private redevelopment in the area.

Mr. T.J. Woosley, co-owner of Briarwood Center and a commercial real estate broker and manager, allowed that it will take a very long time for the Bel-Red corridor to redevelop. One of the things that seems to be missing from the DEIS is the need to retain as much flexibility in allowed uses as possible to avoid creating legal nonconforming uses. The steering committee, the Planning Commission and the City Council should be encouraged to make sure that will not occur as zoning changes occur in the area. Where legal nonconforming uses exist, tenants tend to shy away and long-term vacancies can result. The flexibility to allow all of the existing uses in the area to continue operating as the area redevelops will be critical.

Originally, it was understood that the steering committee would be made up of community members, property owners and business owners from the Bel-Red subarea, but that is not the case. While the steering committee has openly engaged in discussions with the community, there should be representation by involved business and property owners.

Ms. Linda James, owner of Evergreen Center located at 1800 through 1950 13<sup>th</sup> Avenue NE, and the owner of properties on 132<sup>nd</sup> Avenue NE and NE 16<sup>th</sup> Street beyond 136<sup>th</sup> Avenue NE, said she has followed the study process carefully and remains concerned that a sufficient number of business and land owners from the Bel-Red area have not been heard in the process. It is unfortunate that business and land owners do not have representation on the steering committee. While there are two members of the business community on the steering committee, their businesses are not currently located in the corridor and their lives will not be impacted a great deal by the decisions that will be made. Change is inevitable, but the change would be easier to take with more input. With rezoning will come an increase in taxes and rents, and that will force some tenants out. Redevelopment will burden long-time businesses with having to move to another location; the businesses that may have to relocate include Angelo's Restaurant, Flowers First, Little Gym, and Olympic Office Supply.

At the most recent steering committee meeting, the consultant CH2MHill mentioned the idea of doubling the setbacks for properties near streams. The City Council only recently acted to adopt the critical areas ordinance that establishes the current setbacks. Ms. James said three of the properties she owns in the corridor have streams running through them; two of the properties are very narrow, and if the setbacks were increased it would be very difficult to rebuild.

The new Zoning Code needs to allow for a wide variety of uses, including contractors, warehouses, and auto work. Flowers First moved from NE 20<sup>th</sup> Street to its current location on 130<sup>th</sup> Avenue NE and found the use was not permitted under the LI zoning. The owner worried for ten years that the city would eventually force the business to move elsewhere; eventually the city concluded that because the business includes the creation of products from raw materials it is in fact allowed in LI.

Six months ago a high-end used car company wanted to rent space in Evergreen Center. The city concluded that the zoning would not allow the business to operate there. A car rental business is now interested in the same space and the city has concluded that such a use is allowable.

Table 1.3 on page 113 of the DEIS states that mitigation could include city assistance in finding relocation opportunities in the corridor or elsewhere in Bellevue, and revisions to the Zoning Code to allow certain types of industrial services uses in the Bel-Red corridor mixed use zones. Ms. James suggested the statement should be changed to read "...the city needs to include assistance in finding relocation opportunities...."

Mr. Leonard McGhee with Sound Transit, 401 South Jackson Street, Seattle, said Sound Transit has worked closely with the city for more than a year on the Bel-Red corridor project. He noted that Sound Transit will be providing written comments regarding the DEIS prior to the public comment deadline. The Sound Transit board recently took a large step toward bringing a light rail extension package to the voters in the fall of 2007. The board adopted a package that would expand light rail to the north, south and east to connect

even more communities to the light rail system. Under the package, light rail would extent north from the University of Washington to Lynnwood, south from SeaTac Airport to the Port of Tacoma, and east as far as Redmond's Overlake transit center via downtown Bellevue and the Bel-Red corridor. The board also included funding for planning, preliminary engineering and some property acquisition, emphasizing its commitment. Sound Transit is pleased to see the city of Bellevue looking to leverage the opportunities created by the potential of light rail transit in the corridor. The actions are consistent with the objectives of Sound Transit, the state Growth Management Act, and Vision 2020. Sound Transit and the city of Bellevue share a common interest in the Bel-Red corridor.

Three of the four alternatives under study by Sound Transit utilize the NE 16<sup>th</sup> Street corridor, part of which is developed and part of which is proposed to be developed. The light rail alternatives under study by Sound Transit support the development nodes in the corridor that are being studied by the city in the DEIS. In making alternatives viable and working to identify savings to allow for the extension of East Link as far as possible, support from the city will be critical. The NE 16<sup>th</sup> Street corridor has the potential for providing a lucrative transit market, but it will be necessary for Sound Transit to also study an alignment along SR-520 should the city decide not to change land uses in the corridor or should the NE 16<sup>th</sup> Street alignment be found to be infeasible for some reason.

In the December 15, 2005, letter from Sound Transit to the city regarding the Bel-Red corridor project, it was stated that in addition the East Link project will require the siting of a 15- to 20-acre maintenance facility site to the east of I-405 in the corridor. In addition to identifying routing and station alternatives to be studied in detail in the East Link DEIS, the Sound Transit board has directed its staff to identify four alternative maintenance facility sites; three of them are located in the Bel-Red corridor. Those locations are not identified in the Bel-Red DEIS. It will be important for the Bel-Red corridor project to permit the siting of the essential public facility.

Mr. Darin Croston with the Coca Cola Bottling Company located at 124<sup>th</sup> Avenue NE and Bel-Red Road, thanked the steering committee, city staff and local business and property owners for allowing Coca Cola to be part of the process from the beginning. He said the company has had ample opportunity to offer comments at critical stages and has been made to feel welcome.

Coca Cola intends to maintain its status in the corridor for both the short and long terms. The DEIS appears to treat all light industrial activities as somewhat of a dying breed. That is definitely not the case for Coca Cola, and the intent to remain in the corridor will require an appropriate zoning. The company recently made investments in excess of \$17 million at the Bellevue facility, including more than 80,000 square feet of new space, most of which is being used for warehouse and distribution. The company employs hundreds of people directly in operations and contributes indirectly to thousands of businesses in the Puget Sound region. The company has a significant economic impact on the area and participates in local programs such as youth development and education, neighborhood revitalization programs, many local charitable causes and sponsorships, and various environmental activities, including energy conservation and recycling. Coca Cola is committed to being a responsible corporate citizen and will continue to make a positive difference in the community.

Coca Cola does not wish to become a nonconforming use under the Comprehensive Plan or development regulations. The company desires the steering committee to select an

alternative that will allow the company to stay and thrive in the corridor as a permitted use.

Mr. Bob Sternoff, 255 7<sup>th</sup> Avenue South, Kirkland, said he has been associated with the Bel-Red corridor for the past 50 years. He noted his dismay at not having every area that will be affected included in the study area. He said he owns property that lies just outside the study boundaries. Whenever an impact statement is developed, it must take into consideration all of the areas and people that may be affected. For the properties along the south side of Bel-Red Road, that has not happened. Those property owners were told by the steering committee that they will not be included. Whatever happens across the street will impact those properties directly. The fatal flaw in the DEIS is that those property owners were not considered. There are some six properties between 124<sup>th</sup> Avenue NE and 130<sup>th</sup> Avenue NE that will probably be redeveloped in the next several years. At the same time, the uses in place currently are rather limiting and do not represent well what the future holds.

The degree to which property and business owners have not been invited to participate as part of the steering committee is bothersome. A significant number of local property owners should be involved in order to offer different perspectives.

The Bel-Red corridor is home to several light industrial uses, and once light industrial is forced out it will be hard to bring it back. The goods and services that come from light industrial areas are necessary to the city as a whole; they should not be driven to other cities.

Change is always difficult. Where a change is going to be made, it should be predicated on all the possible input from everyone who may be affected currently and on into the future.

Absent additional speakers, Ms. Helland declared the public hearing closed and thanked everyone for their participation.

# *Coca-Cola Bottling Company of Washington*

a COCA-COLA ENTERPRISES company

1150 124th Avenue NE  
Bellevue, WA 98005  
425-455-2000  
800-362-2653 Toll Free  
425-463-2500 Fax

February 15, 2007

Terry Lukens and Mike Creighton  
Co-Chairmen  
Bel-Red Corridor Steering Committee  
City of Bellevue  
PO Box 90012  
Bellevue, WA 98009

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

Dear Chairman Lukens and Chairman Creighton:

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

We are still evaluating all of the detailed information presented in the DEIS, and will be providing a written comment letter prior to your March 12 deadline. At this time, we simply want to restate that our desire to stay and grow in the corridor has not changed. We do not want to become a nonconforming use under the comprehensive plan or development regulations. We therefore urge you to choose a preferred alternative that allows CCBCW to stay and thrive at the Bel-Red site as a permitted use.

**The City's Preferred Alternative Should Retain Appropriately Zoned Land for Our Use, Such as the Light Industrial Sanctuary Concept.**

The Steering Committee is charged with the task of recommending a preferred alternative. We encourage you to recommend a preferred alternative that allows CCBCW to stay and grow as a permitted use, and to protect it from incompatible encroaching uses. Based on the alternatives in the DEIS, we think there are several good options. Alternative 2 appears to most closely meet our objectives, by preserving a Light Industrial sanctuary. Alternatively, it is possible that the LI sanctuary could also be combined into Alternatives 1 or 3. Finally, it is possible that the final EIS could explore new alternatives, such as an overlay district.



Under any of these scenarios, we think we can make a positive contribution to the Bel Red area as the process goes forward.

**Our use is a significant contributor to the economic vitality of the area.**

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

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

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

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

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

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

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

Very truly yours,

By *David Crocker*

& *Robert B. Hall Jr.*

Enclosure

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

My name is Linda James. I am one of the owners of Evergreen Center, located at 1800 – 1950 130<sup>th</sup> Ave. NE. I also own properties on 132<sup>nd</sup> and 16<sup>th</sup> <sup>on</sup> beyond 136<sup>th</sup>.

I have followed this process carefully. I remain very concerned that a sufficient number of business owners and landowners of the Bel-Red Area have not been heard in this process. In my view it is unfortunate that we are not represented on the Steering Committee. I appreciate that there are at least 2 members from the business community on the Steering Committee, however, they are not currently located in Bel-Red and their lives will probably not be impacted a great deal by these decisions.

Change is inevitable. However, it might have been easier to take, if we had more input into the process. My concerns are:

- 1) Taxes and rents will rise quickly with the rezoning, which will force some tenants out.
- 2) Redevelopment will burden longtime businesses with moving to another location such as Angelo's Restaurant (tenant since 1980), Flowers First (1996), Little Gym (1988) and Olympic Office Supply (1983).
- 3) At the last meeting the CH2MHill consultant mentioned that you might want to double the setbacks on properties near streams. This issue was recently addressed by the City Council in the Critical Areas Ordinance. I am one of the owners of 3 properties that are situated on streams in Bel-Red. Last week the COB told me that the setbacks at present exist where the buildings are located. Two of these properties are

very narrow so that, if the setbacks were increased, it would be difficult to rebuild.

- 4) The new zoning code needs to allow for a wide variety of uses such as contractors (RBI Construction, Tri-Mechanical & Audio One) for improvements to homes and commercial spaces, warehouses for Olympic Office Supply, shop space for Reprographics Northwest (tenant since 1983), auto work such as Alignments Plus (tenant since 1990).
- 5) Flowers First moved around the corner from 20<sup>th</sup> to 130<sup>th</sup> and then found that she was not allowed on 130<sup>th</sup>, which is zoned Light Industrial. However, as her business prospered, she worried for 10 years that she would be forced to move again. When I became aware of this, I interceded for her with the COB. She now has a letter from the COB, which states that she may stay on 130<sup>th</sup> because she creates from raw materials and delivers them. Therefore she belongs in Light Industrial.
- 6) Six months ago a high-end used car company wanted to rent a space. The zoning did not allow their business without a six-month process and \$1000. Now we have a rent-a-car business interested in the same space. They are allowed. The cars are virtually the same. The space has been vacant for 6 months.
- 7) *In the DEIS Table 1-3 p. 1-13 under Land Use states that mitigation could include City assistance in finding relocation opportunities in the corridor or elsewhere in Bellevue + revisions to the zoning code to allow certain types of industrial + service uses in Bel-Red corridor mixed-use zones. I would like to change this statement to read "needs to include". City assistance in finding relocation opportunities...*

*Thank you.*

**O'Neill, Kevin**

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**From:** Jim Loring [design@eskimo.com]  
**Sent:** Sunday, February 11, 2007 2:08 PM  
**To:** BelRed  
**Subject:** Eastside Rail

**Bel-Red Corridor Project Steering Committee**

Bel-Red Corridor Project  
c/o Mr. Kevin McDonald  
450 110th Avenue N.E.  
P.O. Box 90012  
Bellevue, Washington 98009  
e-mail [BelRed@ci.bellevue.wa.us](mailto:BelRed@ci.bellevue.wa.us)

11 February 2007

Dear Mr. McDonald,

In reviewing the SEPA Scoping Report for the Bel-Red Corridor Project, it appears that the BN&SF Eastside Rail Corridor has not been included for review. I am sure you and members of the Committee are aware of the limitations of attempting to plan an urbanizing area as encompassing as the Bel-Red Corridor area of study. The exclusion of the existing BN&SF railway illustrates the impossibility of top-down area-wide planning - covering an extremely long time frames - as requiring an all encompassing knowledge and oft predicated on previous assumptions which events prove folly.

Although the BN&SF right-of-way was not included in-depth in the WSDOT I-405 Corridor Project EIS process, the railway adjoining the Bel-Red Corridor - from a land-use perspective - should be further examined. With the uncertainty of Sound Transit 2 and final potential light-rail route selection, an inclusive study would include the existing BN&SF line as an "informal alternative" for Committee discussion. If memory serves, I made brief mention of this in my submitted comments during Scoping.

It has become apparent the WSDOT I-405 Corridor Project EIS's exclusion of the existing rail corridor ("*Eastside Rail*") precipitated a cascade of errors. The potential loss of the Spirit of Washington Dinner Train, regional freight mobility, complications arising from King County's exchange of regional public assets with the Port of Seattle, increasing resistance to the plan converting the existing railway to a trail-only regional facility, and increasing public support of the existing rail line all indicate *Eastside Rail* should be included in the discussions. Coupled with the uncertainties of potential light-rail route selection and outcome of Sound Transit 2 financing, the Committee should take into consideration this existing rail asset.

In reality our knowledge is imperfect, and it is my understanding that things have changed in regard to the BN&SF railway since the I-405 Corridor EIS. The loss of the existing tracks would impede regional freight mobility, eliminate the Spirit of Washington Dinner Train, and preclude future rail for the Eastside. It is becoming increasingly apparent that the light-rail currently under consideration may not be viable, and that an *Eastside Rail* alternative must be taken into consideration.

Regards,

Jim Loring

2/28/2007

**Jim Loring**

1815 153rd Avenue South East  
Bellevue, Washington 98007-6141  
e-mail [design@eskimo.com](mailto:design@eskimo.com)

## O'Neill, Kevin

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**From:** sharonced@hotmail.com  
**Content:** Monday, January 29, 2007 2:43 PM  
BelRed  
**Subject:** Bel-Red Corridor Project Comment

Date Sent: 1/29/2007 2:43:05 PM

City: bellevue

Name: sharon cedola

Address: 14418 Ne 10th st

Mailing List: Yes

Comments: u want to add more traffic to the bellevue-redmond area. Have u ever seen what traffic is like on 148th and 140th around 8th during rush hour? To go shopping, at this time of day, I plan my trip to go with traffic. That means, I do not go on 148th to 8th, I go down 14th, right on 140th, right on bel-red, right on 148th, then left on to 8th. Why because, even though traffic is not suppose to block streets, I can't get on 148th from 10th. Too many one occupancy cars are going down 148th to 90. 140th used to be clear, but now 140th is just as heavy. You have two lanes merging into one lane at bel-red. traffic is great, any time but rush hour traffic, because the commuters are not using the highways, they are using 140th, 148th, and 8th. So I have this to say, drive the major streets at rush hour and figure out how traffic flows before you add more congestion. Traffic is getting worse because the highways are not accessable from the work areas.

State: wa

Zip: 98007

**O'Neill, Kevin**

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**From:** The Leo J Bolles Clinic [bolles@bollesclinic.com]

**Sent:** Monday, January 29, 2007 2:56 PM

**To:** BelRed

**Subject:** Bel Red corridor project

Kevin

Hello, we own commercial property at 15611, 13, 15 and 15617 Bel Red Road. This is just outside the small extended area of the project. I am wondering if we can be considered to be added to the project. We are the last property before the residential area begins. We are behind the Nursing home care facility on 2.5 acres. I have often thought that in the future there will be a building upgrade for us. We are currently underbuilt for our lot size. We have about 20000 square feet. I did some research in the past and discovered it might be possible to upgrade to a 40000 square foot building roughly. We would have to go up to achieve this as we are one story now. I have also thought that the land might be good for a retirement apt situation or even Condos/townhouses since we are on a borderline of commercial and residential.

I was wondering how we could get included in the plan or even if that would make sense.

What do you think?

Sincerely

Edward Bolles

## O'Neill, Kevin

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**From:** Heather R. Jacobs [heather@realloans4realpeople.com]  
**Sent:** Sunday, January 28, 2007 8:43 AM  
**To:** BelRed  
**Subject:** Exciting!  
**Attachments:** Heather R Jacobs.vcf

As a business owner in the corridor, I am excited by the prospect of large growth. I must admit my lofty goal this year was to lobby for a Starbucks in the Lake Bellevue/Bel-Red area. I'm glad someone is thinking much bigger than that. :)

There are so few housing options for workers in that area. We must choose pockets of ultra urban downtown, multi-cultural Crossroads, hidden Wilburton and ridiculously expensive Bridle Trails. This will put Bellevue on the map in earnest as long as infrastructure keeps up.

I'm ready for the growth!

Heather Jacobs  
AMS Mortgage  
2000 116th Ave NE