City of Bellevue

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January 10, 2010

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

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

Dear Chair Reardon:

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

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

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

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

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

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

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

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

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

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

Sincerely,

Don Davidson, DDS
Mayor

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

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