



City of  
Bellevue

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July 20, 2010

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

Re: Updating Bellevue City Council's East Link Alignment Preference in Segments B and C after Review of 112<sup>th</sup> Avenue Light Rail Options Concept Design Report and the Draft Segment C – Evaluation of Hospital Station Options

Dear Chair Reardon,

On behalf of the City of Bellevue I am writing to update the Sound Transit Board on the City's preferred East Link alignment alternatives for Segment B and C after review and discussion of Sound Transit's *112<sup>th</sup> Avenue Light Rail Options Concept Design Report* and the *Draft Segment C – Evaluation of Hospital Station Options*. This letter was supported by a 4-to-3 vote of our Council.

I. **B7 remains Bellevue's preferred alternative and Bellevue has identified two potential stations near South Bellevue Park & Ride that align with B7.** The City of Bellevue reiterates its support for the B7 Alignment as the Preferred Alternative in Segment B. As indicated in our letter dated March 9, 2010, the Council believes B7 has the following benefits over B3 or B2M:

- It avoids impacts to Bellevue Way.
- It avoids noise and visual impacts to the Enatai and Surrey Downs neighborhoods.
- It avoids disturbing or impacting the F.W. Winters House.
- It appears that B7 may cost significantly less than the B3 or B2M options after all of the appropriate mitigation along Bellevue Way and 112<sup>th</sup> Ave. NE is included.
- It will provide faster travel times through the segment while increasing safety and reliability by avoiding conflicts with automobiles and pedestrians.
- It extends the light rail alignment to the BNSF corridor, setting the stage for future extensions of light rail service east to Issaquah and the Eastgate Park & Ride and south to Renton and ultimately Sea-Tac airport.

The primary objection to the B7 alignment is its lack of a connection to the South Bellevue Park & Ride.<sup>1</sup> To address this objection, Bellevue commissioned a study of the feasibility of having a station along Sound Transit's light rail B7 alignment in the vicinity of Bellevue Way SE. Two alternatives are presented in the South Bellevue Station Alternative Location Analysis report summary enclosed with this letter. The stations provide 1,400 stalls, access for transit and direct access connections to assist with mitigation of traffic impacts to

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<sup>1</sup> See, e.g., the Council's February 25, 2009 letter to Sound Transit, page 1, stating that a key principal for the B3 modified is its connection to the South Bellevue Park-and-Ride.

City of Bellevue offices are located at 450 - 110<sup>th</sup> Avenue N.E.

Bellevue Way. **Bellevue urges Sound Transit to modify the B7 route to include the most economically viable of these new stations in lieu of the 118<sup>th</sup> Street Station and update the study of impacts, costs and benefits so that a true comparison of the B7 to the Segment B portion of B2M can be achieved.** Consideration should be given to the numerous potential benefits provided by these alternative stations, including the ability to keep the South Bellevue Park & Ride in operation during construction of light rail,<sup>2</sup> the ability to use the South Bellevue Park & Ride for auxiliary parking or alternative uses after light rail construction is complete, the ability to avoid the severe noise, park and historic property impacts Sound Transit faces with the Bellevue Way alignment, and the ability to avoid traffic impacts to the SE 8<sup>th</sup> and 118<sup>th</sup> Street intersection.<sup>3</sup>

While the relocation of South Bellevue Park & Ride will provide a cooperative solution in Segment B, the Council remains concerned about the traffic impacts from the expansion of the South Bellevue Park & Ride from 500 to 1,475 stalls.<sup>4</sup> Appropriate mitigation still needs to be provided to address these traffic impacts.

In addition, the concern expressed by the Council in February 2009 regarding noise impacts to the residences along the path of the B7 alignment has not been resolved. We stated, "although the DEIS indicates noise walls and other mitigation could be used to attenuate noise on the inside of units, there is not mitigation proposed that would address the noise on the outside of decks and balconies."<sup>5</sup> The B2M noise situation is even worse than B7 (as discussed below), but even so, Sound Transit must provide a plan for appropriate mitigation along the B7 (both interior and exterior).

**II. The City of Bellevue Maintains its Opposition to the B2M Routes.** The Council has steadfastly maintained that running light rail along 112<sup>th</sup> Ave. SE from SE 8<sup>th</sup> Street to Main Street is not acceptable. In 2009, the majority of the Council selected a modified B3 route because it enabled a connection to the South Bellevue Park & Ride but also placed the line furthest away from residences. Sound Transit rejected the City's recommendation to run the alignment down SE 8<sup>th</sup> to 114<sup>th</sup>. In 2009, Bellevue indicated its intent that if the proposed B3 Modified was not acceptable "in its entirety" then the B7 alignment should be reexamined.<sup>6</sup> Instead of moving further away from Bellevue's neighborhoods, the B2M pushes the line even closer.<sup>7</sup> The B3 Modified was also chosen because it would "avoid impacts to businesses north of SE 8<sup>th</sup> Street," such as the Bellevue Club. B2M, particularly in the East and Center running options, has devastating impacts to all of the businesses on the east side of 112<sup>th</sup>, including the Bellevue Club. The west running option has devastating impacts to homes and parks. These impacts can be avoided with B7.

The B2M proposals are inconsistent with principles expressed in the City's 2009 letter, as well as many of the principles in the City's Comprehensive Plan and *Light Rail Best*

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2 In the City's February 2009 letter we indicated, "During construction, we are concerned about how the temporary closure of South Bellevue Park-and-Ride and displacement of transit service would be mitigated." This concern would be eliminated if the South Bellevue light rail station were built in an alternate location.

3 In the February 2009 letter, Council raised the issue of traffic impacts to SE 8th and 118th as one of the bases for not selecting B7 initially. Removing the station from the Greenbaum property clearly eliminates this issue.

4 As the City stated in our February 25, 2009 Letter, "maintaining traffic capacity on Bellevue Way is imperative."

5 February, 2009 letter, Page 6.

6 February, 2009 letter, Page 7.

7 As stated in the February, 2009 letter, "In San Jose, the Light Rail Best Practices Committee visited segments that were median running and pushed the right of way closer to existing residences. This resulted in greater traffic noise and reduced setbacks for these residences, a situation that can and should be avoided in Bellevue."

*Practices Report.* The *Light Rail Best Practices Report* calls on Sound Transit to “protect the character and livability of existing neighborhoods.” Stated plainly, none of the B2M options meet this guiding principal.<sup>8</sup>

An evaluation of specific B2M issues follows:

- A. *Cost.* Based on the information provided it is not possible to assess which of Options 1-4 are preferable based on cost. Bellevue requests that the cost savings from moving the tunnel portal from Main Street to Second Street be separately identified so that the savings from the Council-approved B7/C9T alignment can be evaluated. Changes to the C9T alignment that reduce the cost below its original estimate of \$990 million will be deducted from the \$150 million in the City’s non-binding term sheet.
- B. *Displacements.* The B2M options provide a Hobson’s choice of either devastating and likely unmitigatable impacts to Lincoln Plaza, the Bellevue Club, the Hilton and the Red Lion or the condemnation of 46 residences. Neither option is acceptable, especially when the B7 alignment provides a viable alternative.
- C. *Transit noise.* It does not appear possible to adequately mitigate the noise impacts to the properties surrounding Bellevue Way and 112<sup>th</sup> Ave. SE. While Sound Transit’s reports claim that all noise impacts can be mitigated, this does not appear to be accurate given (a) the footnote on page 13 of the *112<sup>th</sup> Avenue Light Rail Options Concept Design Report* stating that “there may be some residual impacts to outdoor areas”; (b) the numerous media accounts of unmitigated noise impacts in Tukwila despite Sound Transit’s assurance to Tukwila in the Central Link design phase that such impacts would not occur; (c) Sound Transit’s inability to adequately answer the City Council’s questions about the noise impacts in Tukwila or the ability to mitigate similar impacts in Bellevue; (d) Sound Transit’s statement that Bellevue’s noise ordinance does not apply and that Federal ordinances only measure average 24 hour noise levels. Light rail is not exempt from Bellevue’s noise ordinance, and using the 24 hour noise average fails to address the periodic noises made by light rail trains every 5 minutes.

Sound Transit indicated to Council that tight turns are generally the cause of wheel squeal. B2M has tight turns, B7 does not. Sound Transit’s practice is that bells must ring and horns must sound for at-grade crossings and at station entry and exit. B2M has at grade crossings and stations in close proximity to residences. B7 does not have at grade crossings and the stations are further away from residences and in locations where the ambient noise is higher. Sound Transit indicated the typical solution for noise impacts is noise walls. This appears much more feasible along the BNSF rail corridor than along Bellevue Way/112<sup>th</sup>. Properties are above the train along the B2M route and below or at grade with the train along B7. The City’s acoustical engineer has confirmed that noise walls do not provide effective mitigation for properties uphill from the noise source – the sound just travels over the wall. As such, noise walls appear viable for

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<sup>8</sup> The B2A alternative is virtually identical to the alignment of the B2M south of Main Street. Bellevue previously rejected these alternatives on page 7 of its February 2009 letter. The rationale included, “Council does not favor a station at SE 8th Street”; “the modified B3 alignment has an advantage over B2A in that it turns away from residential neighborhoods on 112th Ave. SE”; it “avoids widening of 112th Ave. SE where the right of way becomes more constrained north of SE 8th Street”; the median running alignment would result in significant traffic disruption during construction and require rebuilding of a substantial amount of Bellevue Way and 112th Ave. SE”; and “the median running alignment would remove the vegetated median along 112th Ave. SE which contributes to the character of the surrounding residential areas”. It concluded, “for these reasons, the Council strongly believes the B3 Modified is superior to B2A”.

mitigation along B7 but not B2M. Whether B2M or B7, or any other alignment, Bellevue expects exceptional mitigation of noise impacts, both interior and exterior, to avoid a repeat of the problems that have occurred in Tukwila and elsewhere in Central Link.

- D. Construction Impacts.* The construction impacts from the B2M are ranked from Lower to Moderate to Higher. This is a highly subjective evaluation and does not include a comparison to the B7 alignment. Sound Transit should consider the severe impacts all of the B2M options would have on Bellevue's traffic system through the construction of light rail. This was a key principal in the Council's February 2009 letter and it remains so today. There would be very little construction impact to Bellevue Way and no impact to 112<sup>th</sup> Ave. SE from the B7 alignment.
- E. Historic Properties.* While not identified in Sound Transit's B2M study, preliminary maps developed by the City in conjunction with Sound Transit indicate the B2M light rail right of way runs mere feet from the structure of the F.W. Winters House, Bellevue's only property on the National Historic Register. The light rail alignment runs so close to the house that damage to the house from construction and train vibration will almost certainly damage the house over time and will negatively alter the character and use of this historic structure. The B7 alignment does not impact the F.W. Winters House. Since a viable alternative such as the B7 exists, such negative impacts on the F.W. Winters House must be avoided.
- F. Traffic Impacts.* The traffic impacts to Bellevue Way from the construction and operation of light rail along the path of the B2M require additional study. At first blush it would appear that mitigating the impacts to at grade crossings, particularly at SE 8<sup>th</sup>, will be difficult. These impacts do not occur with B7 because there are no at-grade road crossings.

The Council believes the reduced impacts associated with B7 outweigh the marginal system-wide ridership benefits provided by the South Bellevue Park & Ride station. Even if the South Bellevue Park & Ride cannot be used with B7, the majority of the Council still believes it is the better choice over B2M. However, now that a South Bellevue station appears feasible the viability of the B7 route cannot be ignored.<sup>9</sup>

**III. The City Updates its Preferred Alternative in Segment C to the C9T – 2<sup>nd</sup> Street Option.** Moving the tunnel portal north from Main Street to Second Street maintains the City's guiding principles for light rail at a lower cost and reduces impacts to Bellevue's single family neighborhoods. Bellevue prefers the connection described in B2M Option 4 as it appears to have fewer impacts to roads and would appear to best mitigate noise and visual impacts. Bellevue requests analysis of a connection to this modified C9T alternative with the B7. Given that this connection is quite similar to the C8E alignment we assume this is not an unreasonable request and would be necessary in order for Sound Transit to consider all viable alternatives.

A final request for the C9T alternative is to examine whether the 6<sup>th</sup> Street crossing could be moved further south to avoid conflicts with private property and also to potentially increase cost savings.

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<sup>9</sup> Sound Transit should also consider the technical comments provided by the City on February 25, 2009. Many of these comments are still valid and have direct application to the B2M alignment options.

**IV. Hospital Station.** Based on the information provided the City has not been able to definitively agree on which of the four hospital station alternatives is best. That said, we encourage that the following criteria be applied when considering Options A, B and C: (1) good station access to/from the hospital district; (2) safe and accessible pedestrian and bicycle access to the station including consideration of appropriate crossings; and (3) adequate visibility of the station to ensure adequate way-finding for users. Moreover, we believe that Option D is the least attractive due to its proximity to residences and its distance from places of employment. Please continue to develop options to determine which has the greatest cost benefit to the system after all necessary mitigation is included in the costs. Topics to consider are accessibility for vehicles and pedestrians, traffic impacts to NE 8<sup>th</sup>, accessibility to the Wilburton area, accessibility to the hospitals and noise impacts to the community.

An additional request is to examine whether it is feasible to cross underneath 8<sup>th</sup> to reduce the grade of the alignment and hopefully reduce the noise impacts at the same time. This would also appear to be beneficial for the subsequent crossing under 12<sup>th</sup> Street as well.

**V. The City is United in Opposition to C11A.** In our prior communications to the Sound Transit Board we may not have been sufficiently clear about our opposition to the C11A alternative. Given the severe and unmitigatable impacts to Bellevue's roads and neighborhoods from this option we cannot stress strongly enough that Bellevue is opposed to C11A. This opposition extends, obviously, to Options 5 and 6 of B2M as well. In addition to the impacts, we note that significant speed and reliability issues exist with this alignment that should make it unattractive to the region regardless of the devastating impacts it would have in Bellevue<sup>10</sup>

Thank you for your consideration. We look forward to continued cooperation with Sound Transit in the creation of East Link in a manner that will be a credit to Sound Transit, Bellevue and the region.

Sincerely,



Don Davidson, DDS  
Mayor

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

Enclosures:

- 1) South Bellevue Station Alternative Location Analysis, July 2010, Executive Summary

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<sup>10</sup> Please also refer to our analysis of at grade rail in Segment C on pages 9 and 10 of the February 2009 letter. Also refer to the supplemental traffic analysis provided from the City to Sound Transit indicating the devastating traffic impacts caused by the C11A option. [Reference]