



City of Bellevue

March 25, 2026

Sound Transit Board of Directors
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: City of Bellevue Guiding Principles for the Enterprise Initiative

Dear Chair Somers and Members of the Board:

Thank you for the opportunity to provide comments on the Sound Transit Board's Enterprise Initiative. We write this letter just days away from the Crosslake Connection event celebrating full implementation of the 2 Line, and we wish to acknowledge and thank you for this important investment in our community.

The City of Bellevue appreciates the Board's proactive approach to the agency's future revenue gap, estimated at nearly \$35 billion. The Board is facing difficult choices in balancing the capital program and making updates to the Sound Transit 3 (ST3) System Plan by May. Bellevue was engaged throughout the development of the ST3 plan, and the city will participate as an active partner and stakeholder during the Enterprise Initiative. The attached "Guiding Principles" reflect the city's interests at the outset of the Enterprise Initiative conversation.

Maintaining subarea equity is the city's highest and overarching priority for the Enterprise Initiative. Sound Transit's subarea equity policy requires the agency to utilize local tax revenue for transportation programs and services that benefit the residents and businesses of a subarea in proportion to the level of revenues contributed by that subarea. Maintaining the policy is critical to retaining voter trust in Sound Transit. Communities on the Eastside have invested in the vision of expanding high-capacity transit to connect growing communities on the east side of Lake Washington. Beginning near the current South Kirkland Park and Ride, the ST3 route will serve three East Link Stations – Wilburton, Bellevue Downtown, and East Main – before heading further east through Factoria and Eastgate to downtown Issaquah. Subarea equity is more than just Bellevue's overarching priority – it is a shared interest among Eastside cities. We know that transit access looks different in BelRed versus Newport, and by the same token, we know what Renton needs and what Redmond needs may look different, too. Subarea equity is the key to preserving as much flexibility as possible for different communities to see the benefit of Sound



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Transit's transformative possibilities. Bellevue opposes revisiting the subarea equity policy and subareas' financial contributions to projects in other subareas. As a next step, the Sound Transit Board should direct its staff to develop affordable options that demonstrate alignment with the subarea equity policy.

High-Capacity Transit Connecting Eastside Cities. A major reason for Bellevue's support of ST3 was the commitment to provide high-capacity transit to south Bellevue. In addition to ongoing study of the South Kirkland to Issaquah light rail line, Bellevue requests that Sound Transit analyze the costs and benefits of implementing the 4 Line project as bus rapid transit (BRT). Each mode has its merits; light rail is a stronger catalyst for transit-oriented development (TOD) and may offer faster transit travel times. BRT is less expensive and faster to build. Additional benefits may be possible with BRT, such as connecting the 4 Line to the 2 Line at South Bellevue Station and potentially adding stops, such as on Bellevue Way. A cost-benefit analysis should also consider how transit could connect more communities on the Eastside.

Stations. The 4 Line will connect vital Eastside centers to the high-capacity transit system. Bellevue has a proven track record of investing in TOD to support thriving, vibrant neighborhoods. Case in point: the city constructed 10 lane miles of new roadway in the BelRed street network, at a cost of \$300 million. High-capacity transit is critical to realizing the full potential of the Factoria and Eastgate neighborhoods, both of which are designated as draft countywide centers and play a significant role in the city's overall growth strategy. The 142nd Place SE overpass component will seamlessly link bus and high-capacity transit service. The Enterprise Initiative must consider future growth in the region.

4 Line Project Timeline. Bellevue urges Sound Transit to minimize delay and avoid deferment of high-capacity transit on the Eastside, which would likely increase costs. As several Board members have pointed out, project savings are identified when projects are developed to 30% design and beyond. Projects that have reached that milestone should not be prioritized above projects in earlier stages of design or projects that have not yet entered design.

Connecting People to the High-Capacity Transit System. Bellevue supports maintaining Sound Transit Express (STX) and as drafted in the ST3 System Plan. STX is necessary to complement high-capacity transit and King County Metro's local service and RapidRide program. STX provides critical interconnectivity among Eastside cities and throughout the region. Freed service hours should be locally reinvested to improve connections. Bellevue supports strategically-located park and ride lots that intercept trips "upstream," enabling the high-capacity transit system to serve more people.



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Thank you for considering the City of Bellevue's comments. Bellevue has already seen how high-capacity transit transforms neighborhoods and is helping us realize the City's vision. We look forward to continued partnership with Sound Transit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mo Malakoutian", is enclosed in a thin black rectangular border.

Mo Malakoutian, Mayor

Cc: Bellevue City Council
Diane Carlson, City Manager
Dow Constantine, CEO, Sound Transit
Andrew Singelakis, Transportation Department Director, City of Bellevue
Emil King, Community Development Director, City of Bellevue

Attachment: Bellevue Guiding Principles for Sound Transit's Enterprise Initiative

Bellevue Guiding Principles for Sound Transit's Enterprise Initiative

Bellevue's *2024-2044 Comprehensive Plan* strategically centers growth in the city's mixed-use centers and calls for the city to "support planned growth and development with a bold transit vision that provides efficient, useful, attractive service for most people, to most destinations, most of the time, serving maximum ridership." Bellevue's *Transit Master Plan*, adopted by City Council in 2014, states that "transit needs to maximize the return on investment on existing and anticipated public transportation projects by providing transit service where high ridership is anticipated, typically where there is some mix of higher residential or commercial density and at major activity centers."

Subarea Equity. Maintaining subarea equity is an overarching priority for Bellevue. The City of Bellevue urges Sound Transit to uphold its subarea equity commitment, which requires that local tax revenues for projects and services in each subarea generally in proportion to the level of revenues each subarea generates. This policy ensures that Eastside communities receive a fair return on their contributions, strengthens accountability and public trust, and supports reliable, high-quality transit aligned with local growth priorities.

The guiding principles below are informed by the *Comprehensive Plan*, *Transit Master Plan*, and Bellevue's correspondence during development of the Sound Transit 3 (ST3) plan.

High-Capacity Transit Connecting Eastside Cities. Bellevue requests that Sound Transit evaluate the costs and benefits of light rail, bus rapid transit, or a combination of modes that can cost-effectively connect Kirkland, Bellevue and Issaquah; a future service known as the 4 Line. This service builds on the city's Eastgate/I-90 Land Use and Transportation Project and ongoing neighborhood area planning work in Eastgate and Factoria, which envision a transit-oriented corridor with mixed-use development, multimodal connections, and enhanced accessibility. Integrating high-capacity transit into this corridor supports Bellevue's goals for economic vitality, improved mobility, and high-ridership transit service.

4 Line Project Timeline. Bellevue urges Sound Transit to minimize delays to the 4 Line project. As the last project in the ST3 Plan, the 4 Line is not scheduled to begin operations until 2044. Further delays would likely increase costs rather than achieve savings. Keeping the project on schedule also supports the region's long-term sustainability goals by providing a reliable, high-capacity alternative to vehicle travel along heavily traveled corridors.

Bellevue Guiding Principles for Sound Transit's Enterprise Initiative

Stations:

- **Eastgate Station.** This station has strong transit-oriented development (TOD) potential around the Eastgate Park & Ride. Eastgate Station will also connect to Bellevue College, serving students, faculty, and staff. This connection will support the I-90 corridor's economic vitality and improve access to Bellevue College, advancing its educational and workforce development goals. Eastgate is also designated a draft countywide center, which is a focus area for future transportation investments that provide a mix of jobs, housing and services, and supported by multimodal transportation. Completion of the 142nd Place SE overpass is critical to seamlessly link bus and high-capacity transit service.
- **Richards Road Station.** Factoria is a locally rooted, globally connected neighborhood and major employment center that attracts people from around the world to live, work, shop, and learn. Strong transit access will further support Factoria as a well-connected community. Factoria is also designated a draft countywide center, which is a focus area for future transportation investments that will provide a mix of jobs, housing and services, and supported by multimodal transportation.
- **Lakemont Station.** We understand that this is a provisional station.

Access to Transit. Adequate, strategically located park-and-ride lots at the outer edges of the region are essential to intercept trips "upstream" along heavily traveled corridors and support the overall efficiency of the high-capacity transit system.

Regional Bus Service. Regional express bus service is integral to the success of ST3. Regional express service is necessary to supplement the high-capacity transit component of the system and to provide interconnectivity among Eastside cities and the region.