



City of Bellevue

450 110th Avenue NE
Bellevue, WA 98004

Meeting Agenda Planning Commission

Wednesday, June 10, 2026

6:30 PM

Room 1E-113

The Planning Commission meetings are conducted in a hybrid manner with both in-person and virtual options. To speak at the meeting, you may attend:

- In-person
- By calling (253) 215-8782 and entering Webinar ID: 860 6256 3586
- [www.zoom.us](https://www.zoom.us/j/86062563586) and entering Webinar ID: 860 6256 3586, Passcode: 983801

<https://cityofbellevue.zoom.us/j/86062563586>

1. Call to Order
2. Roll Call
3. Approval of Agenda
4. Reports of City Council, Boards and Commissions
5. Staff Reports
 - a) [26-391](#) Planning Commission Meeting Schedule

6. Written and Oral Communications

The total time for oral communications is 30 minutes. Speakers will be allowed up to three minutes to speak. Additional time shall only be allowed if the Chair or a majority of the Commission determines additional time to be allowed.

The form to sign-up to speak during Oral Communications will be available 12.00 p.m. to 6:00 p.m. on the date of the Planning Commission meeting. To be added to the speaker list for oral communications, you may sign-up in person using the QR code posted inside Room 1E-113 or online using this link:

www.Bellevuewa.gov/planning-oral-comms

a) [26-392](#) Written Communications

b) [26-393](#) Oral Communication

7. Public Hearing

8. Study Session

a) [26-394](#) Final Review of Transportation Element Conformance Comprehensive Plan Amendment

b) [26-395](#) Final Review Study Session: 2026 Annual Comprehensive Plan Amendment - Evans Plaza

c) [26-396](#) High Density Residential and Planned Unit Development Land Use Code Amendment

9. Other Business

10. Approval of Minutes

a) [26-397](#) Minutes of May 13, 2026

11. Executive Session

12. Adjournment

For alternate formats, interpreters, or reasonable modification requests please phone at least 48 hours in advance 425-452-4174 (voice) or email kgulledge@bellevuewa.gov. For complaints regarding modifications, contact the City of Bellevue ADA, Title VI, and Equal Opportunity Officer at ADATitleVI@bellevuewa.gov.

Rules of decorum for public communication and conduct at meetings were adopted by the City Council in Ordinance 6752. Copies of this ordinance can be found on the city's website, and are also available from the City Clerk's Office.

Tentative 2026 Planning Commission Meeting Calendar

<u>Mtg</u>	<u>Date</u> <u>Agenda Topic</u>	<u>Priority</u>	<u>Agenda Type</u>	<u>Location</u>
26-11	June 24, 2026			1E-113/ Hybrid
	Parking Reform LUCA: Request to Set Public Hearing	1	Study Session	
	Great Neighborhoods: Factoria Update & Request to Set Public Hearing	1	Study Session	
26-12	July 8, 2026			1E-113/ Hybrid
	BelRed LUCA: Request to Set Public Hearing	1	Study Session & Recommendation	
	Great Neighborhoods: Eastgate Update & Request to Set Public Hearing	1	Study Session	
26-13	July 22, 2026			1E-113/ Hybrid
	2026 CPAs: Evans Plaza Public Hearing	1	Public Hearing & Recommendation	
	2026 CPAs: Transportation Conformance Public Hearing	1	Public Hearing & Recommendation	
	Parking Reform LUCA: Public Hearing	1	Public Hearing & Recommendation	
26-14	September 9, 2026			1E-113/ Hybrid
	Great Neighborhoods: Public Hearing	1	Public Hearing & Recommendation	
	Bellevue College LUCA: Introduction	2	Study Session	
26-15	September 23, 2026			1E-113/ Hybrid
	Great Neighborhoods: Eastgate Factoria follow up discussion (if needed)	1	Study Session & Recommendation	
	Downtown Livability 2.0 LUCA: Request to Set Public Hearing	2	Study Session	

Priority: 1. Related to specific mandate and may require action this meeting. 2. Related to a specific mandate leading up to an action sometime in the future. 3. Not related to a mandate, may require action or may be information only.

Nesse, Katherine

From: Holly D. Golden <holly.golden@hcmp.com>
Sent: Friday, May 22, 2026 12:10 PM
To: PlanningCommission
Cc: Whipple, Nicholas; Gallant, Kristina
Subject: BelRed amenity incentive system comment letter
Attachments: Amenity Incentive System Comment Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from holly.golden@hcmp.com. [Learn why this is important](#)

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Dear Planning Commissioners,

I'm attaching a comment letter on the draft BelRed amenity incentive system to encourage flexibility and a full range of options for projects. This feedback is based on conversations with several clients looking at sites across BelRed, including feedback from architect teams crunching numbers under the new code.

Please let me know if you have any follow up questions.

Thanks,
Holly

Holly D. Golden

Hillis Clark Martin & Peterson P.S.

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holly.golden@hcmp.com | www.hcmp.com | vCard | view my bio

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May 22, 2026

Via Email (planningcommission@bellevuewa.gov)

City of Bellevue
Planning Commission
450 110th Avenue NE
Bellevue, WA 98004

Re: Comments on BelRed Look Forward Land Use Code Amendment – Amenity Incentive System (LUC 20.25D.050)

Dear Chair and Members of the Planning Commission:

This letter is submitted on the May 18, 2026 Strike Draft of the BelRed Look Forward Land Use Code Amendment (“LUCA”). Our comments are directed specifically to the Amenity Incentive System (“AIS”) proposed in LUC 20.25D.050.

As a starting point, we encourage the City to recognize that the baseline assumption in the LUCA and in staff’s presentation and discussion is that BelRed will move from an incentive-based system to a mandatory inclusionary zoning system. This is already a new cost and new requirement applied across entire projects. The AIS represents an additional obligation that adds further cost. If there is a new mandatory affordable housing requirement, then the bonus floor area should be carefully calibrated so requirements and amenities do not tip projects out of feasibility or inadvertently encourage projects to under build to the base in these transit-oriented areas where housing and job density is most appropriate.

I. The AIS Should Be Structured as a Single, Uniform Bonus Point Menu Applicable Across the Entire BelRed Overlay

The draft AIS breaks the BelRed Overlay into seven separate neighborhood districts with bonus point values calibrated by neighborhood to provide higher incentives for amenities that contribute to neighborhood character objectives. While we appreciate the intent behind place-based calibration, this approach creates significant complexity and uncertainty for developers and landowners.

We recommend that the City replace the neighborhood-district-specific bonus point structure with a single, uniform amenity menu applicable to all sites within the BelRed Overlay, with a single set of bonus point values for each amenity. The BelRed Overlay is already subject to a coherent set of development objectives under the BelRed Subarea Plan. A unified, flexible point system, similar in structure to the Wilburton Overlay’s AIS under LUC

20.25C.050, would be easier to administer, more predictable for applicants, and more likely to generate robust participation because it allows applicants to tailor their amenity mix to site conditions and community needs.

II. The Following Amenities Should Be Added to the BelRed Amenity Incentive Menu

We recommend that the City expand the list of eligible amenities in LUC 20.25D.050.C to include the following categories. Where point values are shown as placeholders in the current draft, we encourage the City to calibrate them consistently with analogous amenities already in the system, with a baseline recognition that the City must be selective about adding costs to projects.

A. Publicly Available Sporting Facilities

The draft AIS does not currently include publicly accessible recreational or sporting facilities as an eligible amenity category. We recommend adding a bonus point category for publicly available sporting facilities, such as ice rinks, indoor athletic courts, pools, fitness facilities, or similar that are open to the general public. Such facilities advance the BelRed Subarea Plan's vision of a mixed-use neighborhood distinguished by community amenities serving residents, employees, and the broader city. They also generate significant daytime and evening activity that activates the public realm and supports surrounding retail and restaurant uses.

B. Fee-in-Lieu Option Supporting the BelRed Arts District

The draft AIS currently includes a placeholder for in-lieu fees, noting only that this item is “[t]o be reviewed at future study session.” We strongly encourage the City to develop a concrete fee-in-lieu option as part of this LUCA rather than deferring it indefinitely. In-lieu fees are a well-established tool, already used in the affordable housing context, and there is no reason the same mechanism cannot be applied to support arts and cultural programming in BelRed.

A dedicated BelRed Arts District fund could support capital improvements, artist residencies, cultural programming, and operations within the Arts District Intensive Area and throughout the neighborhood. This approach would meaningfully expand the universe of projects that contribute to the Arts District by capturing contributions from sites that are not located within the Arts District Intensive Area or that lack the physical capacity to accommodate arts uses on-site.

C. Space for Priority Uses: Childcare, Early Learning, and Schools On Site

The Wilburton Overlay AIS already recognizes child care services as a bonus amenity, providing *eight bonus points for every one square foot of Child Care Service, up to a maximum of 15,000 square feet, including outdoor areas dedicated exclusively for use by the Child Care Service.* The BelRed AIS should include a comparable – and potentially broader – category for priority community-serving uses provided on site, including:

- Licensed childcare and early learning facilities;
- K-12 educational facilities; and
- Other essential community facilities as designated by the Director.

These uses are among the highest-priority needs for a growing residential neighborhood. Providing them on-site as part of mixed-use development removes significant barriers for families with children, reduces vehicle trips, and supports community cohesion. We recommend that the bonus point value for qualifying on-site community facilities be set at a rate no lower than that applied to child care services in the Wilburton Overlay and that the Director be authorized to designate additional priority uses by rule to ensure the list remains current with community needs over time.

D. Grocery Stores and Daily-Needs Retail

The draft AIS does not include grocery stores or other daily-needs retail uses as an eligible bonus amenity. We recommend adding a bonus point category for full-service grocery stores or food markets that are open to the general public and located at the ground floor of a mixed-use development. Access to fresh food and daily-needs retail is a fundamental quality-of-life consideration for any new urban neighborhood. BelRed's transition from an industrial and commercial area to a walkable, transit-oriented district will be materially advanced by the early provision of neighborhood-serving grocery retail.

E. Amphitheaters and Performance Venues

The draft AIS includes outdoor plazas and linear event plazas as eligible amenities, and the Arts District Intensive Area requires that performance spaces be included within standard outdoor plazas. We recommend separately recognizing amphitheaters and purpose-built outdoor or indoor performance venues as a standalone bonus amenity category. Amphitheaters and performance venues, beyond the more general "performance space" feature of a plaza, generate significant cultural programming, attract visitors from across the region, and serve as iconic neighborhood landmarks.

F. Critical Area Improvements, Including Invasive Species Removal on Steep Slopes

The draft AIS includes stream restoration as a bonus amenity, with detailed criteria for restoration plans, minimum size, City access easements, and coordination with the public trail system. We strongly support this provision and recommend that it be supplemented with a broader critical area improvement category that encompasses a wider range of restoration and enhancement activities beyond stream restoration alone.

Specifically, we recommend that the City add bonus point eligibility for invasive species removal and habitat restoration on steep slopes and other critical areas within the BelRed Overlay. BelRed contains significant critical areas, including steep slopes, wetlands, and riparian corridors, and invasive species, particularly Himalayan blackberry, knotweed, and similar species, pose serious ongoing threats to the ecological integrity of these areas. Unlike stream daylighting or channel restoration, invasive species removal on slopes is a lower-cost, high-impact intervention that many projects can feasibly undertake on or adjacent to their sites.

We recommend that the critical area improvement category include at least the following eligible activities:

- Removal of invasive plant species and restoration of native vegetation on steep slopes, wetland buffers, or stream riparian corridors;
- Habitat restoration work performed above and beyond minimum critical area mitigation requirements under Part 20.25H LUC; and
- Other critical area enhancement measures approved by a qualified professional and the City.

The existing stream restoration standard appropriately requires that a restoration plan shall be prepared by a qualified professional and approved by the City, and we recommend the same standard apply to all critical area improvement bonus claims. Bonus points should be calibrated based on dollars invested in qualifying work, consistent with the approach used in the Wilburton Overlay's Critical Area Restoration and Enhancement category, which awards sixty-six and seven-tenths points for every \$1,000 spent on critical area restoration or enhancement beyond the minimum mitigation requirements.

G. Family-Sized Housing

The Wilburton Overlay AIS already recognizes family-sized housing as a bonus amenity. *Under LUC 20.25C.050.B.2, dwelling units with three or more bedrooms earn one bonus point for*

every one gross square foot of the dwelling unit. We urge the City to adopt an identical provision for the BelRed AIS.

BelRed is envisioned as a complete, livable neighborhood, not simply a district of studio and one-bedroom units oriented primarily toward young professionals. The long-term success of BelRed as a neighborhood depends on its ability to attract and retain families with children.

A one-bonus-point-per-gross-square-foot incentive for three-or-more-bedroom units, consistent with the Wilburton standard, provides a straightforward, market-responsive mechanism for encouraging developers to include larger units in their projects. The City should adopt this provision for BelRed without modification, applying it uniformly across all sites in the BelRed Overlay without regard to neighborhood district.

H. Access and Connectivity

The Wilburton Overlay AIS includes access and connectivity improvements as a separately recognized bonus amenity category, with point values calibrated to the type of corridor provided.

We recommend that the BelRed AIS adopt an access and connectivity bonus point category on identical or stronger terms. The BelRed Overlay's development framework under Part 20.25D includes detailed standards for access corridors and circulation, including enhanced flexible access corridors, flexible access corridors, active transportation access corridors, service corridors, and shared-use paths, *with the purpose of enhancing walkability, active transportation options, and transit-oriented design by prioritizing pedestrian-friendly infrastructure, a comprehensive bicycle network, a connected network of sidewalks, plazas, parks, and open spaces, and effective traffic management.* Recognizing access and connectivity improvements as a bonus amenity would incentivize investment in connectivity.

We note that the access and connectivity bonus is particularly well-suited to BelRed, where the build-out of the street and access corridor network is still being debated. Incentive-based access improvements could help shape the walkability and permeability of the neighborhood for decades to come.


III. Conclusion

We appreciate the opportunity to submit these comments and commend the City for its commitment to an ambitious and forward-looking vision for BelRed. The amendments we propose are intended to make the AIS more flexible, more inclusive of community priorities, and more likely to generate the broad participation that will be necessary to achieve the BelRed Subarea Plan's goals over the decades ahead. We urge the Planning Commission to direct staff to incorporate these recommendations into the next draft of LUC 20.25D.050.

City of Bellevue
Planning Commission
May 22, 2026
Page 6 of 6

We welcome the opportunity to discuss any of these comments in greater detail and are available to meet with staff or present to the Commission at your convenience.

Very truly yours,



Holly D. Golden

E-Mail: holly.golden@hcmp.com
Direct Dial: (206) 470-7656

Nesse, Katherine

From: Bratton, Nicholas <nbratton@kingcounty.gov>
Sent: Friday, May 22, 2026 12:11 PM
To: PlanningCommission
Cc: Gallant, Kristina; Evans, Ashley; Taylor, Katherine (DNRP)
Subject: comment letter - BelRed LUCA for 5/27 meeting
Attachments: BelRed comment PlanComm May 27 2026.docx.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from nbratton@kingcounty.gov. [Learn why this is important](#)

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Dear members of the Bellevue Planning Commission,

Please find attached a letter from Mo McBroom, Interim Director of King County's Department of Natural Resources and Parks, regarding the BelRed subarea updates on the agenda for the 5/27 meeting. Thank you for distributing and reading this letter in advance of the meeting.

Nick



King County

Nick Bratton (he/him)
Transfer of Development Rights Program Manager
Water and Land Resources Division
King County Department of Natural Resources and Parks
E: nbratton@kingcounty.gov
T: (206) 263-9192



King County
Department of
Natural Resources and Parks
Director's Office
King Street Center
201 South Jackson Street, Suite 6100
Seattle, WA 98104-3855

City of Bellevue Planning Commission
450 110th Ave NE
Bellevue, WA 98004

May 22, 2026

Dear Chair Khanloo and members of the Bellevue Planning Commission,

King County respectfully requests that the City of Bellevue include transfer of development rights (TDR) in the amenity incentive system for the BelRed subarea in its land use code amendments. TDR is an innovative, market-based land use tool encouraged by the Growth Management Act that incentivizes growth in urban areas and conserves ecologically important rural lands.


The City of Bellevue and King County have successfully partnered to use TDR in the past. A 2009 interlocal agreement resulted in the permanent protection of farms and forest land in the Snoqualmie Valley and a payment from the County to the City to invest in amenities in the BelRed neighborhood.

The BelRed land use code amendments present an ideal opportunity to renew a TDR partnership. City policy supports TDR in the subarea (S-BR-50) and comprehensive plans (LU-6, LU-39).

Since the previous TDR partnership with Bellevue, King County has evolved its collaborative model through agreements with Sammamish, Normandy Park, and Shoreline to create more value for urban neighborhoods and to protect land whose conservation provides direct benefits to city residents. Examples of these benefits include improved food security, clean air and water, strengthened climate resilience, expanded recreation opportunities, and new funding for infrastructure and affordable housing in cities' growing neighborhoods through TDR revenue sharing.

I appreciate the complexity of the amenity incentive system and understand that the City has a range of land use outcomes it seeks to promote through code amendments. TDR is valuable as a tool that can provide multiple public benefits to the City and County alike. I hope you will consider including it in a way that achieves meaningful outcomes for both our communities. King County is ready to renew our collaboration and to support the City's implementation of TDR in BelRed. Thank you for considering our input.

Sincerely,

Signed by:

3BF37BA2A4A1476...

Mo McBroom
Interim Director

Nesse, Katherine

From: pamelajohnston <pamjjo@msn.com>
Sent: Sunday, May 24, 2026 6:08 PM
To: PlanningCommission; Council
Cc: Panganiban, Justin; Gallant, Kristina; Nesse, Katherine; ljlopezmsl@gmail.com
Subject: BelRed Review

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This review evaluates Ondina and Copal as representative examples of emerging BelRed architecture. While both projects are stronger at the district scale than at close range, they do not yet reflect the level of identity, landscape integration, and pedestrian comfort that BelRed should aspire to achieve. In particular, the massing reads as heavy at street level, with broad brick base elements that feel visually dense and insufficiently balanced by upper-level articulation.

BelRed should be understood as an urban district shaped by landscape first. Bellevue is best described as a city in a park, where buildings are introduced into an existing framework of trees, topography, and waterways. As a result, the district's human scale should be defined primarily by streetscape, canopy, and public open space rather than by façade manipulation alone.

At street level, two to three stories of uninterrupted brick façade can feel harsh and overly monumental, particularly before the landscape has matured. This condition is likely to improve as tree canopy develops; however, the current approach places too much responsibility on future planting to resolve present-day scale concerns. On wider streets, especially those with strong southern exposure and generous deciduous canopy, buildings in the six- to eight-story range may be able to avoid step-backs if the lower floors are articulated with greater care and detail at the pedestrian level.



If the first two stories incorporate stronger horizontal lines, vertical rhythm, or other forms of visual modulation, buildings of six to eight stories can achieve a more comfortable pedestrian scale without mandatory setbacks. It is also worth reconsidering whether ground-level glazing must always be fully transparent, particularly where residential uses may occupy the lower floors. A more flexible approach could support privacy, livability, and façade richness while still contributing to an active streetscape.



Trees, streams, and open space should establish the district's human scale more effectively than architecture alone.

Viewed at the district scale, BelRed could be conceived as a quilt of green urban rooms: a network of framed blocks, courtyards, and streets that respond to topography and create a softer, more continuous public realm. In this vision, buildings support the landscape composition rather than dominate it.

Nesse, Katherine

From: Layla R. Khademi <layla.khademi@hcmp.com>
Sent: Tuesday, May 26, 2026 10:17 AM
To: PlanningCommission
Cc: Whipple, Nicholas; Gallant, Kristina; John Marasco; paul osullivan; Holly D. Golden
Subject: Albertsons Inc. BelRed LUCA Comment Letter
Attachments: Albertsons BelRed LUCA Comment Letter and Campus Concept v 3.pdf

You don't often get email from layla.khademi@hcmp.com. [Learn why this is important](#)

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Dear Planning Commissioners,

Please find attached a comment letter regarding the draft BelRed Look Forward LUCA, submitted on behalf of Albertsons Companies Inc.

Please let me know if you have any follow up questions.

All the best,

Layla

Layla R. Khademi

Hillis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104

d: **206.470.7669** | 206.623.1745 | f: 206.623.7789

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May 22, 2026

Bellevue Planning Commission
Bellevue City Hall
450 110th Avenue NE
Bellevue, WA 98004

Re: *Albertsons Spring District Campus Street Grid Segment*

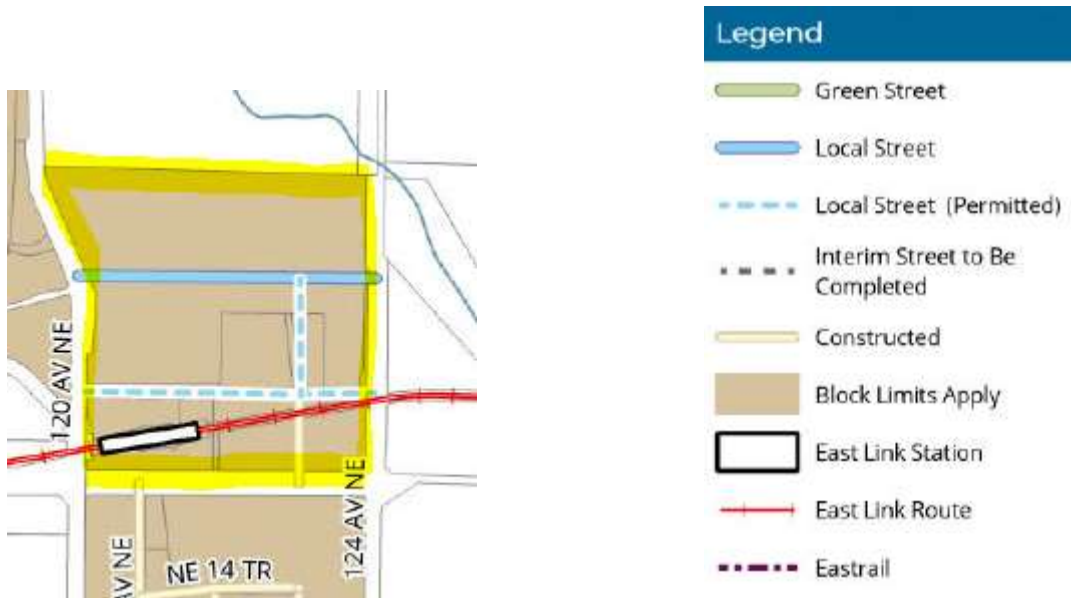
Dear Chair Khanloo and Commissioners:

Albertsons Companies Inc. ("**Albertsons**") owns the 18.6-acre site located at 1723 124th Avenue NE (the "**Albertsons Campus**" or the "**Site**"). The Albertsons Campus is bounded by 120th Avenue NE to the west and 124th Avenue NE to the east. NE Spring Boulevard is near to the south, but without direct access to the Site. There is currently internal access to the Site from 124th Avenue NE, via NE 16th Street, a private accessway.



The Albertsons Campus is constrained by the proposed street grid:





The street grid, as currently drafted, would require a new public local street cutting east-west across the Site. This requirement is incompatible with Site conditions, topography, and impedes future development plans. Importantly, the Site is under common ownership. This east-west street grid segment only touches Albertson’s property. There is no “land-locked” parcel condition to solve, and the street segment only precludes thoughtful master planning of a large TOD site.

At the April 22, 2026, Planning Commission meeting, several Commissioners raised concerns regarding the application of rigid street grid requirements to sites with incompatible site conditions, emphasizing the importance of flexibility. This segment of street grid appears to be a good candidate for the exemption criteria proposed by staff. Given this, it is more reasonable to remove the Site from the street grid now, while the grid is being finalized, rather than apply requirements that will be waived.

I. The Street Grid is Unnecessary Given the Layout and Single Ownership of the Site

As proposed, the street grid would introduce a public local street into a privately owned, single-ownership development. No such connection currently exists between 120th Ave NE and 124th Ave NE in this location. Because the Albertsons Campus is owned and operated by a single entity, imposing a public street network is unnecessary. Requiring the grid would create an unwarranted burden on the property without providing commensurate public benefit.

II. The Site Topography is Incompatible with the Street Grid

Moreover, the street connections are characterized by significant topographical constraints that render development in conformance with the proposed street grid impractical. Commissioners raised concerns about this exact issue in the April 22nd Planning Commission meeting, after hearing testimony from Albertsons about the topographical constraints. Imposing rigid street grid requirements on sites with incompatible topography risks stalling development altogether, as such requirements become infeasible to implement. KPFF has studied the engineering required for this street grid segment, and the attached packet shows the significant retaining wall and grade considerations. As contemplated, this road

segment would be a canyon into the Site. It will not create the pedestrian connectivity contemplated in the neighborhood. It will be an unwelcoming, expensive, and impractical mandate.

III. Future Development Plans Will Provide Substantial Pedestrian and Bike Connections Through the Property

Albertsons has submitted the attached campus concept for future development. The concept illustrates a robust pedestrian and bicycle network, complemented by central open space and a water feature. These pedestrian and bicycle pathways are located to align with the Site's topographical constraints, which are not considered in the mandated street grid. Importantly, the scale and placement of these pathways are far less disruptive to overall development than the proposed public local street, which would effectively bisect the Site and significantly limit site planning.

IV. Conclusion

In light of these considerations, the street grid segment cutting east-west across Albertsons Campus should be removed from the street grid entirely. The proposed grid is unnecessary given the Site's unified ownership and cohesive layout, which do not warrant the imposition of a public street network bisecting the Site. Moreover, the Site's significant topographical constraints make the grid infeasible and, if applied, would stall development.

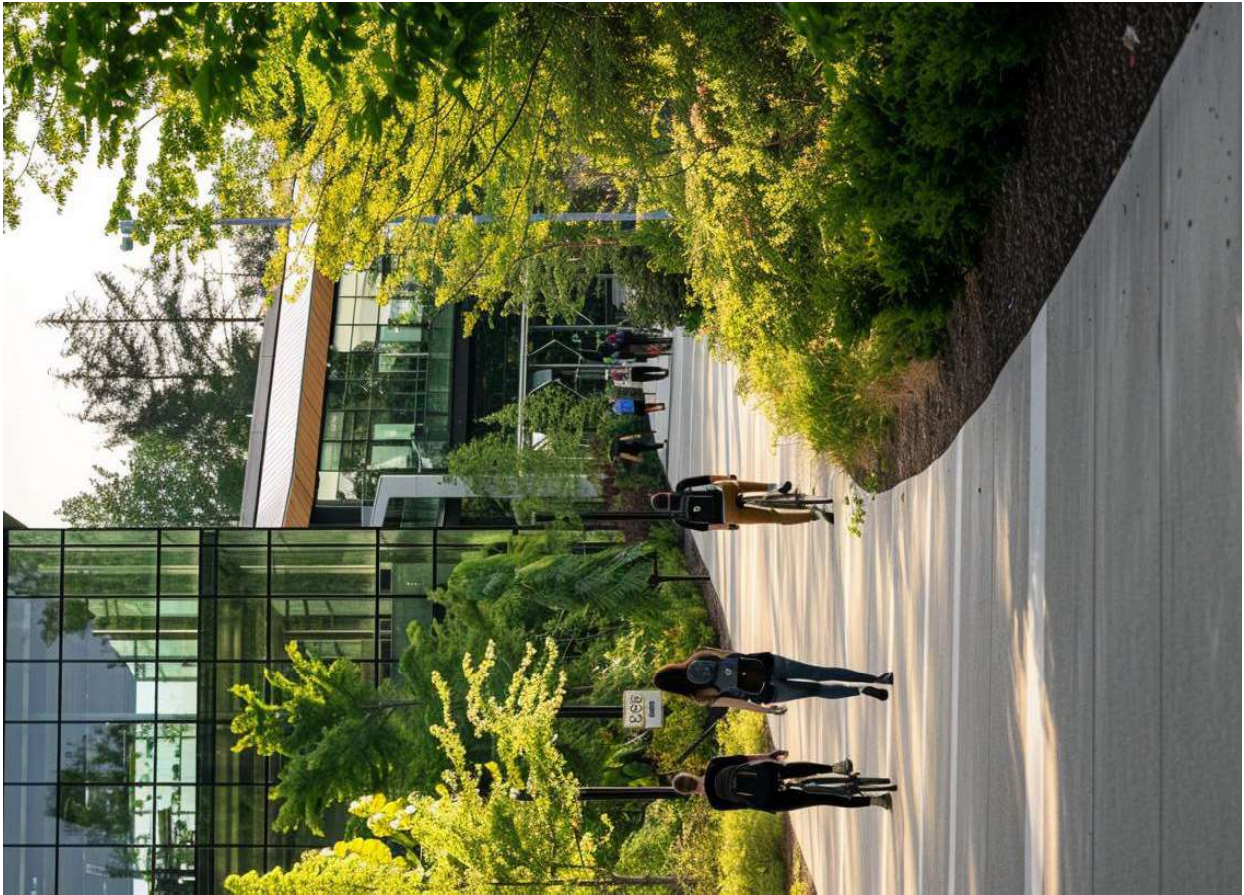
Finally, the campus concept demonstrates that future development will deliver substantial pedestrian and bicycle connectivity through a thoughtfully designed network that responds to existing site conditions. Collectively, these factors confirm that retaining the street grid designation for this site is unwarranted and counterproductive.

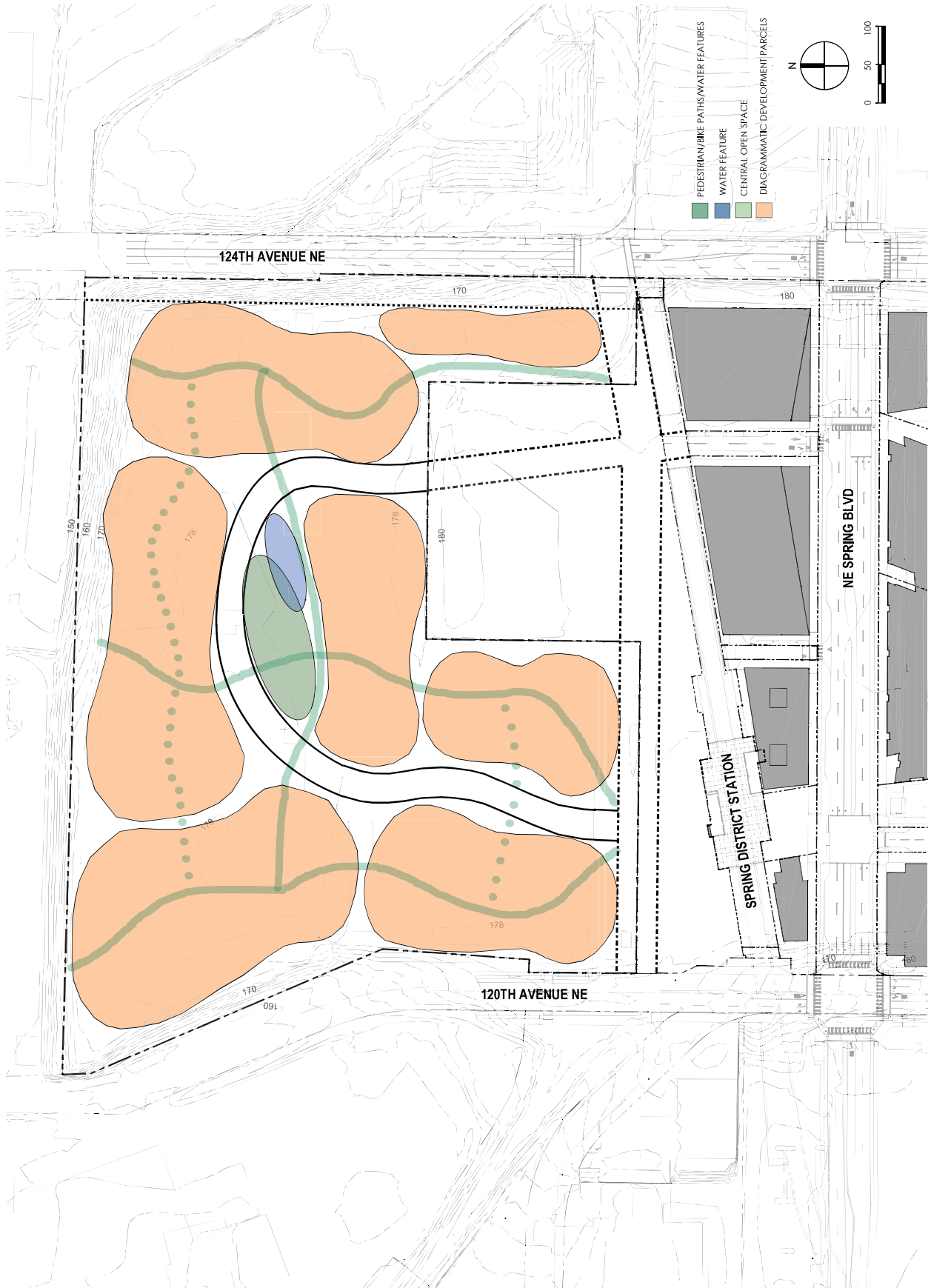
Very truly yours,

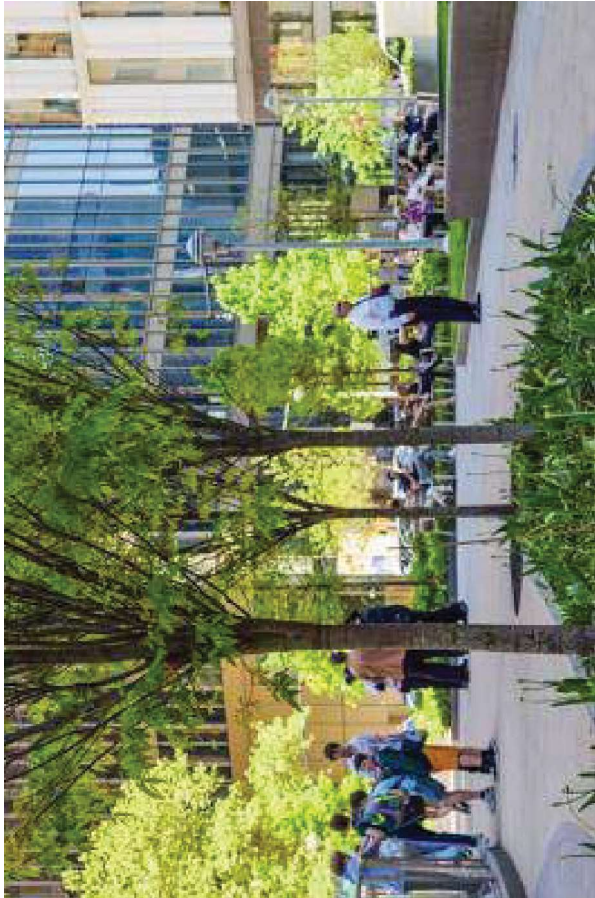
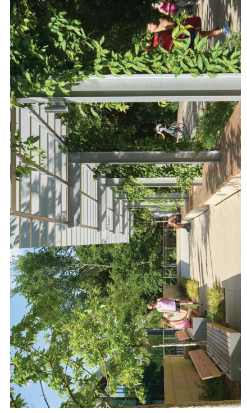
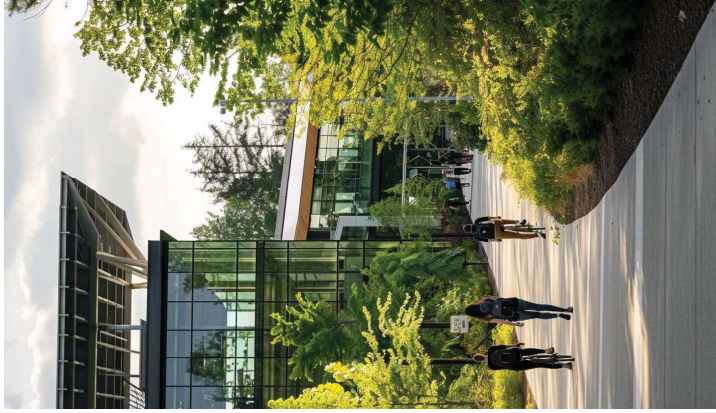
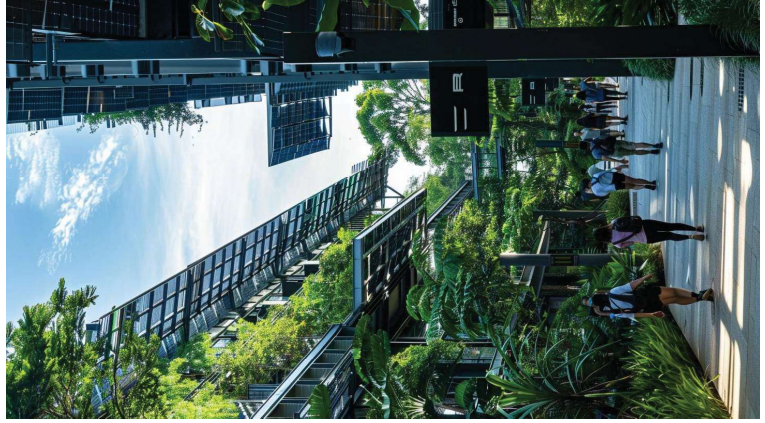
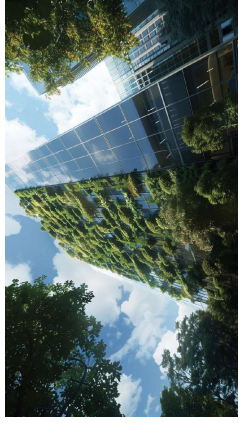
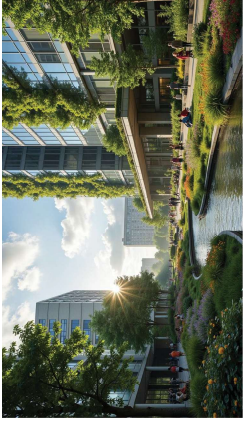
SAFEWAY INC.

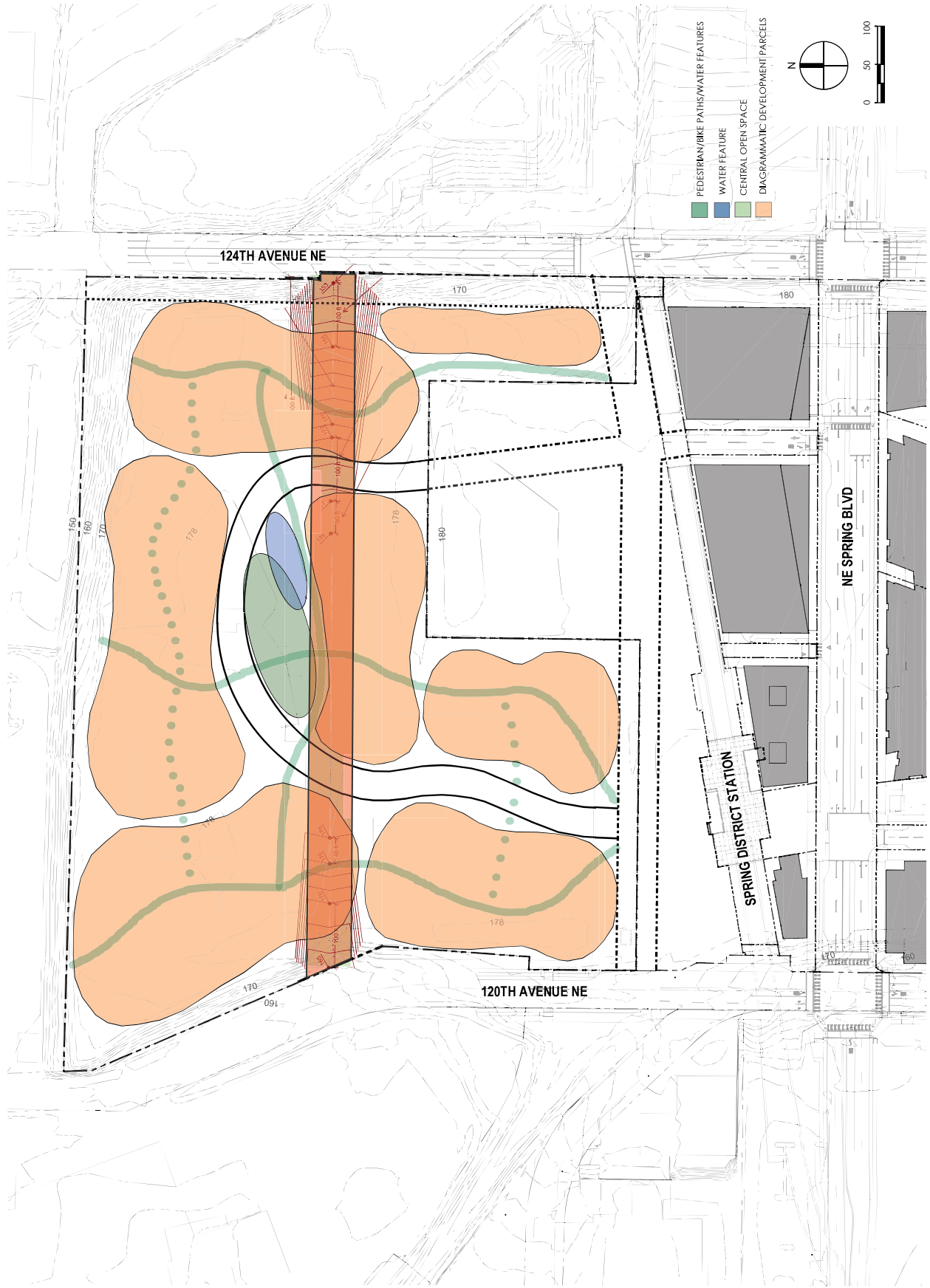


Eric Holzer
Senior Director, Corporate Real Estate









Nesse, Katherine

From: Diana Leo <diana@bellevuechamber.org>
Sent: Tuesday, May 26, 2026 7:58 PM
To: Khanloo, Negin; Lu, Jonny; Villaveces, Andres; Ferris,Carolynn; Goeppeler, Craighton; Nilchian, Arshia; PlanningCommission; Whipple, Nicholas; Gallant, Kristina
Cc: Nesse, Katherine; Kennedy, Mariah; Nava Carlyle
Subject: Preliminary Traffic Assessment of the BelRed Street Grid
Attachments: BelRed Look Foward LUCA - TENW Grid Assessment Memo 6-17-2025.pdf

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Dear Chair Khanloo, fellow Commissioners, et al.:

At the recommendation of Commissioner Kennedy, I am recirculating the 2025 TENW memo on street grid implications. As the Commission continues these germane discussions, having this data readily available is imperative for next steps.

Attached is the preliminary traffic assessment by TENW for BelRed. The analysis reviews vehicle capacity and multimodal connectivity, while addressing the practical challenges that make building a complete street grid a hindrance.

Please let me know if you have any questions. Thank you.

Warmly,
Diana

Diana Leo | Vice President of Government Affairs
Bellevue Chamber of Commerce
M: 435.760.0559 E: diana@bellevuechamber.org
330 112th Ave. NE, Suite 100, Bellevue, WA 98004



MEMORANDUM

DATE: June 17, 2025

TO: Jodie Alberts
Bellevue Chamber

FROM: Chandler Waldal / Chris Forster, P.E.
TENW

SUBJECT: Preliminary Traffic Assessment of the Bel-Red Street Grid
BelRed Look Forward LUCA
TENW Project No. 2025-097

This technical memorandum documents our preliminary traffic assessment conducted for the BelRed Subarea in the context of the City of Bellevue’s BelRed Look Forward Land Use Code Amendment (LUCA) process. The purpose of the analysis was to evaluate the need for a street grid in the center of the subarea as currently depicted in the current BelRed Land Use Code (LUC).

This analysis addresses capacity needs for vehicles, multimodal connectivity needs, and discusses practical constraints that have and will continue to prevent the construction of a full street grid.

Study Area

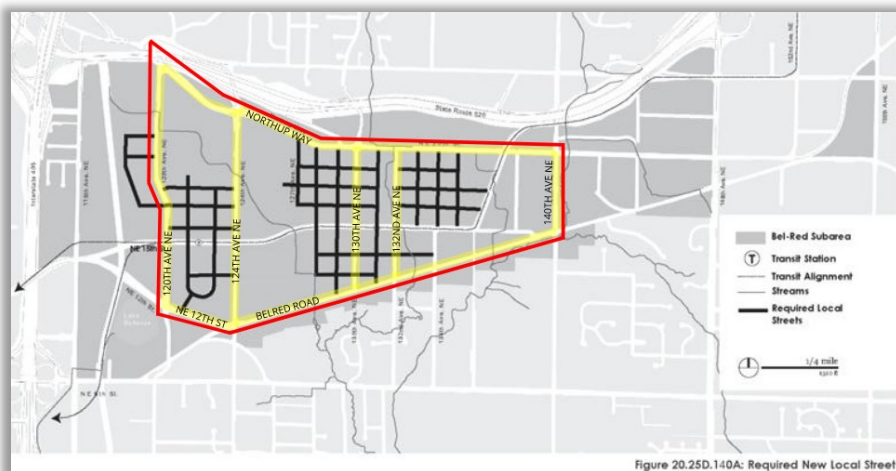
The study area is located in the center of the BelRed subarea and focuses on the location of the street grid that is currently shown in the Bel-Red LUC (Figure 20.25D.140A). The study area is depicted below and consists of the following seven (7) roadway segments:

East-West Arterials:

- BelRed Road between 120th Ave NE and 140th Ave NE
- Northup Way between 120th Ave NE and 140th Ave NE

North-South Arterials:

- 120th Ave NE between BelRed Road and Northup Way
- 124th Ave NE between BelRed Road and Northup Way
- 130th Ave NE between BelRed Road and Northup Way
- 132nd Ave NE between BelRed Road and Northup Way
- 140th Ave NE between BelRed Road and Northup Way



Vehicle Capacity Assessment

A PM peak hour vehicle capacity assessment was conducted on the seven (7) arterial roadway segments listed above to determine if the existing arterial roadway network in the BelRed subarea would accommodate the forecasted vehicle demand without the full street grid depicted in the Bel-Red LUC. In addition, we have included a summary of the City of Bellevue’s 2044 vehicle corridor performance results as documented in the City of Bellevue 2024-2044 *Comprehensive Plan FEIS*.

Analysis Scenarios

Land use and traffic forecasts for two (2) scenarios consistent with the City of Bellevue 2024-2044 *Comprehensive Plan* were analyzed for this study: 2044 Preferred Alternative and 2044 Preferred Growth Alternative. **Table 1** summarizes the land use growth forecasts for each scenario in the Bel-Red subarea.

Table 1
Land Use Growth Forecast – Bel-Red Subarea

Land Use Forecast	2044 Preferred Alternative	2044 Preferred Growth Alternative
Housing Units	+27,625	+8,520
Jobs	+54,801	+15,645

Source: Bellevue 2044 Comprehensive Plan FEIS, Appendix K

Both alternatives assume the completion of a set of new transportation investments as adopted in the 2022-2033 Transportation Facilities Plan (TFP). The following improvements were included in the City’s year 2044 Comprehensive Plan analysis:

- TFP-213: This project includes multimodal improvements to 124th Avenue NE from NE 12th Street (BelRed Road) to NE Spring Boulevard.
- TFP-215: This project includes a new arterial roadway connection (NE Spring Blvd) between 130th and 132nd Avenue NE.
- TFP-218: This project includes multimodal improvements along 130th Avenue NE between NE 20th Street and NE BelRed Road.
- TFP-265: This project includes roadway and pedestrian improvements along 124th Avenue NE between Ichigo Way (NE 18th Street) to Northup Way.
- TFP-260: This project includes the widening of 120th Avenue NE between NE 16th Street and Northup Way to four lanes.

Notably, the City’s 2044 roadway network in the Comprehensive Plan did not include the completion of Spring Blvd between 124th Ave NE and 130th Ave NE (TFP-270), nor did it include the completion of the street grid as currently depicted in the Bel-Red LUC.

Traffic Volumes

PM peak hour vehicle turning movement volumes from the City’s long range forecasting model were provided by the City of Bellevue for both the 2044 Preferred Alternative and 2044 Preferred Growth Alternative. It should be noted that volumes at each intersection were post-processed independently without any volume balancing or adjustments done between adjacent intersections. To accommodate for any imbalances between intersections, the roadway segment volumes used in this study were based on an average of all entering and exiting vehicles within a given roadway segment. See **Attachment A** for the detailed traffic volumes which include the City’s intersection turning movement forecasts for each alternative and the resulting arterial roadway segment volumes used for this analysis.

Methodology

Our vehicle capacity assessment was based on the methodology described in the Florida Department of Transportation's (FDOT) *2023 Multimodal Quality/Level of Service Handbook* (QLOS) for motor vehicle arterial level of traffic stress. The FDOT QLOS methodology is a widely used planning-level methodology intended to be used by engineers, planners, and decision-makers at generalized planning levels. The QLOS methodology assigns an LOS grade to road segments based on motorized vehicle Generalized Service Volume Tables (GSVT). These GSVTs are based on the *Highway Capacity Manual (HCM), 6th Edition* and roadway, traffic, control characteristics, and multimodal data.

The following criteria were considered to determine the LOS grade on each arterial based on the QLOS methodology:

- Land Use Category
- PM Peak Hour Two-Way Volumes
- Number of Lanes

The QLOS handbook uses HCM based LOS grades which are defined as follows:

LOS C describes stable operation, with travel speeds between 50% and 67% of the base free-flow speed, and a volume-to-capacity ratio no greater than 1.0.

LOS D describes a less stable operation, with travel speeds between 40% and 50% of the base free-flow speed, and a volume-to-capacity ratio no greater than 1.0.

LOS E describes an unstable operation with significant delay. Travel speeds are between 30% and 40% of the base free-flow speed, and a volume-to-capacity ratio is no greater than 1.0.

LOS F describes extremely slow travel flow, with high delay and extensive queuing at boundary intersections. Travel speeds are 30% or less of the base free-flow speed, or the volume-to-capacity ratio is greater than 1.0, indicating over capacity operations.

Detailed QLOS criteria and adjustments are included in **Attachment B**.

Arterial Capacity Analysis Estimates

Table 2 summarizes the LOS forecasts for each of the seven (7) roadway segments in our study area for the 2044 Preferred Alternative and 2044 Preferred Growth Alternative.

Table 2
LOS for Bel-Red Arterials

Roadway Segment	2044 Preferred Alternative	2044 Preferred Growth Alternative
East-West Arterials		
BelRed Road	E	D
Northup Way	E	D
North-South Arterials		
120 th Ave NE	C	C
124 th Ave NE	D	C
130 th Ave NE	E	D
132 nd Ave NE	E	D
140 th Ave NE	D	C

As shown in **Table 2**, all arterial roadway segments are expected to operate below capacity at LOS C, D or E in the 2044 Preferred Alternative and at LOS C or D in the 2044 Preferred Growth Alternative without the street grid as currently depicted in the LUC. Additionally, with the future completion of Spring Blvd. between 124th Ave NE and 130th Ave (not included in the above analysis), overall roadway capacity in the east-west direction will increase resulting in even better operations on Bel-Red Road and Northup Way. None of the roadway segments in the study area are expected to perform at LOS F (over capacity) in either of these scenarios. Detailed LOS estimate worksheets can be found in **Attachment C**.

City of Bellevue Comprehensive Plan EIS Vehicle Performance

The City of Bellevue 2024-2044 *Comprehensive Plan* FEIS included an evaluation of vehicle corridor performance on arterial roadway segments in the BelRed subarea based on anticipated vehicle travel speeds. The city's BKRCast (Bellevue-Kirkland-Redmond SoundCast) travel demand model was used to forecast vehicle corridor speeds. Roadway segments that meet the urban travel speed Performance Target are considered as "Met" based on their performance target identified for each Performance Management Area (PMA) in the MIP (Mobility Implementation Plan). The BelRed neighborhood is located in PMA 1; therefore the performance target is greater than or equal to 0.5 times the typical urban travel speed (40% of the posted speed limit)

The City's *Comprehensive Plan* findings for vehicle corridor travel speed on the arterial roadways in the study area can be found below in **Table 3** and in the two images below for both the 2044 Preferred Alternative and the 2044 Preferred Growth Alternative.

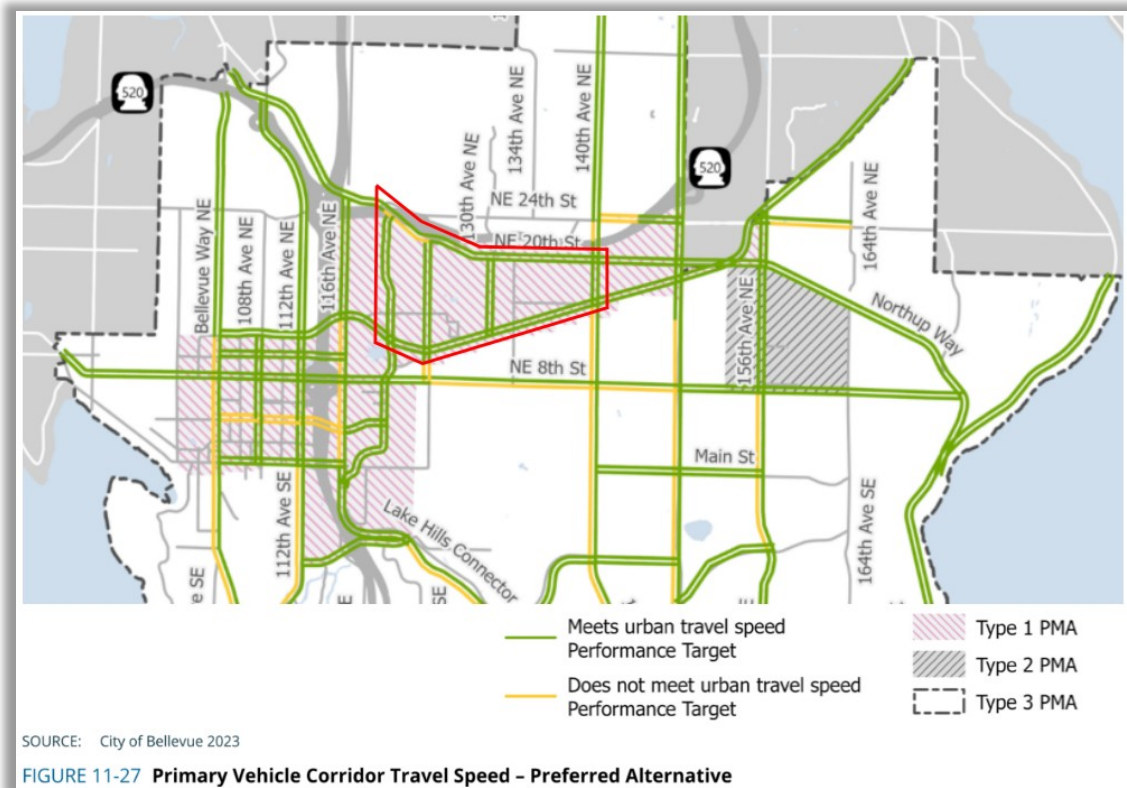
**Table 3
Vehicle Corridor Travel Speed Performance
from the 2024-2044 Comprehensive Plan FEIS**

Roadway Segment	2044 Preferred Alternative	2044 Preferred Growth Alternative
<u>East-West Arterials</u>		
BelRed Road	Met	Met
Northup Way	Met ¹	Met
<u>North-South Arterials</u>		
120 th Ave NE	Met	Met
124 th Ave NE	Met	Met
130 th Ave NE	Met	Met
132 nd Ave NE ²	N/A	N/A
140 th Ave NE	Met	Met

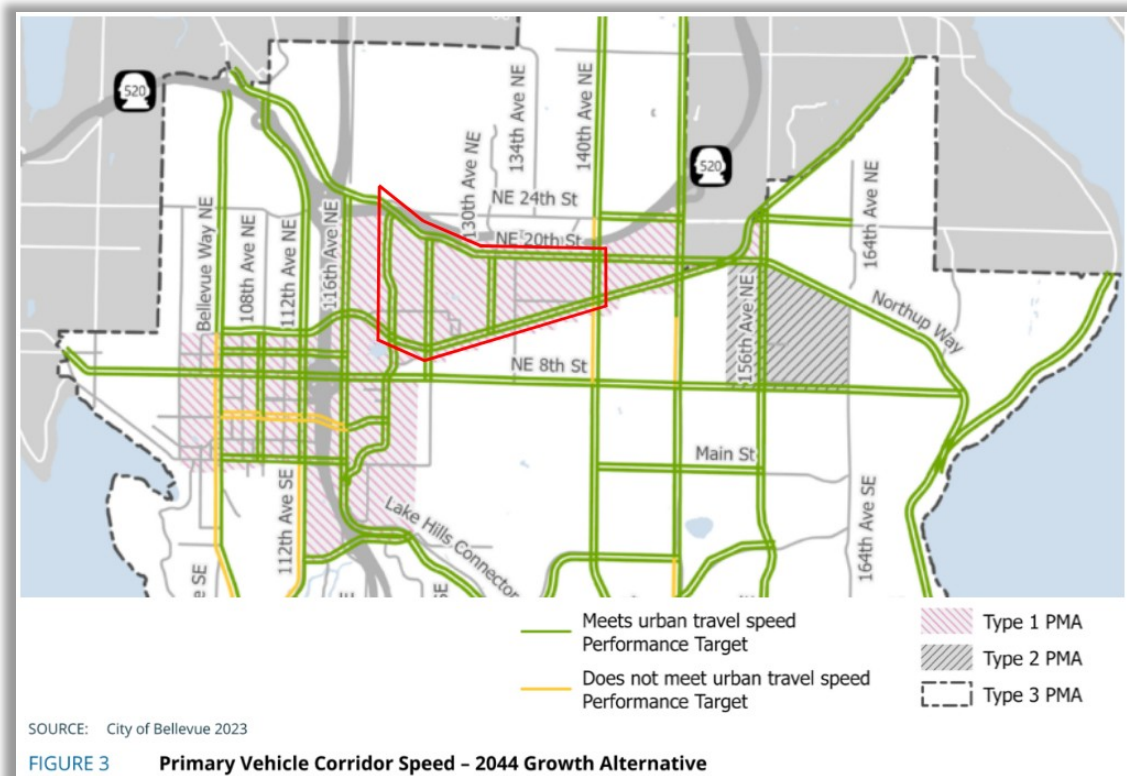
1. Met with the exception of Northup Way between 120th Ave NE and 124th Ave NE in the Eastbound direction.

2. 132nd Ave NE was not analyzed in the City's 2024-2044 *Comprehensive Plan*.

As shown in **Table 3** and in the two images on the next page, according to the City of Bellevue 2024-2044 *Comprehensive Plan*, with exception to only one segment in the 2044 Preferred Alternative (Northup Way between 120th Ave NE and 124th Ave NE in the eastbound direction), all arterial roadway segments in the BelRed neighborhood are anticipated to meet the vehicle urban travel speed performance targets in both the 2044 Preferred Alternative and 2044 Preferred Growth Alternative without the Bel-Red street grid as currently depicted in the LUC. Additionally, with the future completion of Spring Blvd. between 124th Ave NE and 130th Ave (not included in the City's comprehensive plan analysis), the vehicle speeds on BelRed Road and Northup Way should only improve.



Source: City of Bellevue 2024-2044 *Comprehensive Plan FEIS* (Chapter 11 - Figure 11-27)



Source: City of Bellevue 2024-2044 *Comprehensive Plan FEIS* (Appendix K - Figure 3)

Vehicle Capacity Assessment Conclusions

Using planning level methodology described in the FDOT *2023 Multimodal Quality/Level of Service Handbook* for motor vehicle arterial level of traffic stress, none of the seven (7) arterial roadway segments in the center of the BelRed subarea are expected to exceed capacity under both the 2044 Preferred Alternative and 2044 Preferred Growth Alternative without the Bel-Red street grid as depicted in the current Bel-Red LUC. Additionally, the City of Bellevue 2024-2044 *Comprehensive Plan* findings further support these results with all arterial roadway segments in the study area meeting the adopted performance standards for vehicle corridor travel speeds without the street grid. **These findings show that additional east-west and north-south vehicular roadway capacity through the completion of a street grid is not needed, and that the existing arterial roadway network provides sufficient capacity for the planned buildout of the Bel-Red subarea.** Because East-West capacity is currently the most limited in this area, the completion of Spring Blvd. between 124th Ave NE and 130th Ave NE as an additional East-West arterial roadway is still supported.

Multi-Modal Connectivity Considerations

The analysis summarized above shows that a grid of local streets is not needed for vehicular capacity purposes. However, a robust network of multi-modal connections in the BelRed Subarea is still appropriate. This can be achieved through requirements to construct non-motorized facilities (pedestrian-only and/or pedestrian/bike-only facilities) and smaller private streets that serve essential functions such as garage access, loading/trash access, and pick-up/drop-off access. These types of connections can satisfy minimum block perimeter requirements with only minor impacts to buildable area. An example of successful non-motorized connectivity is the requirement for through-block connections in the Downtown LUC. These types of facilities provide sufficient ped/bike mobility in a very dense setting within a minimal footprint (12-16 feet in width). Private access roads or alleys that provide sufficient width to accommodate smaller delivery trucks and trash/recycling vehicles, sidewalks on one side, and optional street parking would satisfy essential vehicular access to development in a section as small as 28 feet in width. In summary, the BelRed Subarea does not require a grid of local streets to provide sufficient multi-modal connectivity. Multi-modal connectivity can be successfully achieved through a network of non-motorized connections and private streets/alleys.

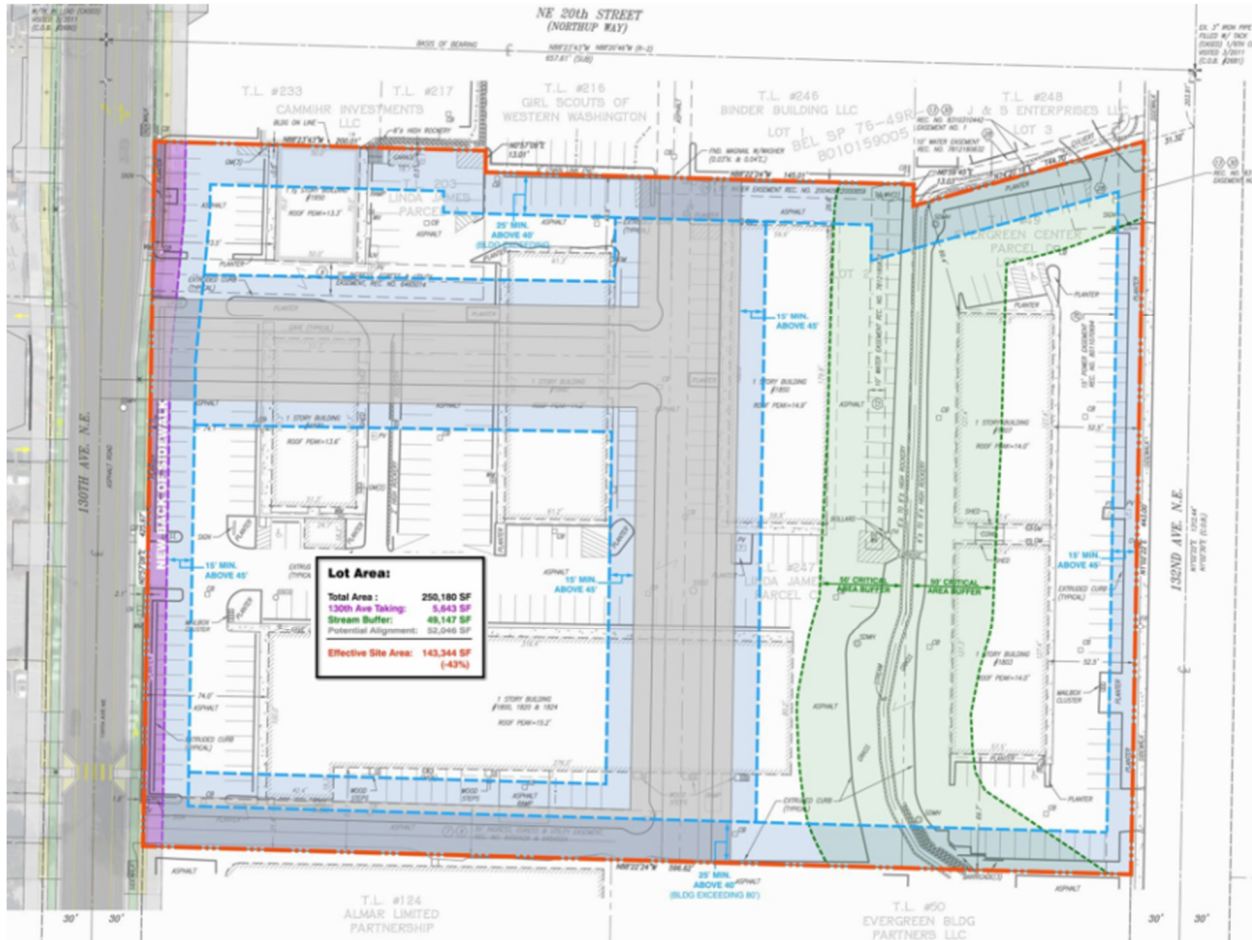
Other Street Grid Constraints

The BelRed street grid as depicted in the current City of Bellevue LUC was likely developed without the benefit of an in-depth evaluation that considered ownership of parcels and parcel lines, significant grades, and locations of critical areas. With only a few exceptions, the results of the proposed local street grid requirements has led to relatively little development activity occurring in BelRed over the last 15 years.

Many of the local streets depicted in the LUC cross multiple properties with different ownership. In most cases property lines are not aligned from one property to the next, and the planned streets would require inequitable ROW dedications from one or more property owners, leaving small sliver parcels and making redevelopment infeasible. In addition, due to timing of development, most of the streets need to be constructed in two phases with the first development carrying the burden of building a much larger proportion of the final road section on their property. These disproportionate roadway sections also lead to difficulties in aligning the local streets over distances.

Several areas of the BelRed subarea have significant grades, creeks, wetlands, and other critical areas. While some consideration has been given to creeks in the development of the street grid, many properties are significantly burdened with other critical areas that, along with street grid requirements, make redevelopment infeasible. One example is the Evergreen Business Center property on 130th Ave NE. Initial

feasibility studies (see image below) show that the required street grid requirements along with critical area setbacks make redevelopment of the property economically infeasible.



Additionally, regardless of property ownership constraints, some of the roadways shown in the street grid as depicted are likely infeasible even if they were standalone roadway projects. One example is the steep slope that exists west of 130th Ave NE north of the light rail line (west side of the Cadman/Heidelberg property). The east-west roadway depicted in the LUC is likely not feasible due to this slope; however, the street grid requirements at this location have made redevelopment of one of the largest properties in BelRed almost impossible.

Another example of a street grid constraint is the large retaining wall that was recently constructed on the west side of 124th Ave NE north of Spring Blvd. The roadway grid depicted in the current LUC shows multiple new local access streets connecting to 124th Ave NE at this location which may be infeasible due to the grade change. A series of closely spaced intersections here may also negatively affect traffic flow on a key arterial that connects Bel-Red with SR520.

The BelRed Look Forward LUCA process is an opportunity to develop a more creative and flexible set of transportation infrastructure requirements that considers each of the constraints outlined above and allows redevelopment to be feasible and to occur more rapidly.

Please contact me at (760) 994-7376 or chandler@tenw.com with any questions.

Attachments

ATTACHMENT A

2044 Traffic Volume Forecasts

*(Turning movements provided by City of Bellevue with resulting segment volumes
summarized by TENW)*

2044 Preferred Growth Alternative

Area 1b BelRed

Int	NS Street	EW Street	NB			SB			EB			WB		
			LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
29	116th Ave NE	NE 12th St	87	596	482	150	852	103	282	857	137	413	1634	94
32	120th Ave NE	NE 12th St	52	413	63	69	251	22	33	749	179	256	787	32
34	124th Ave NE	Bel-Red Rd	79	276	266	112	406	108	29	746	138	384	895	179
37	130th Ave NE	Bel-Red Rd	6	9	10	204	2	403	256	830	6	4	940	143
39	140th Ave NE	NE 20th St	126	298	187	198	439	337	317	578	201	140	580	201
40	140th Ave NE	Bel-Red Rd	228	361	112	48	341	371	173	651	168	147	1005	34
47	148th Ave NE	NE 20th St	115	957	68	265	1206	63	142	438	89	348	497	183
48	148th Ave NE	Bel-Red Rd	357	961	133	49	1321	251	162	393	218	151	646	21
59	Bel-Red Rd	NE 24th St	2	194	91	4	516	337	172	701	102	115	419	5
60	156th Ave NE	Bel-Red Rd	15	266	132	95	886	285	114	300	33	204	518	50
61	156th Ave NE	NE 24th St	147	382	108	169	959	47	25	466	299	90	326	56
68	130th Ave NE	Northup Wy	180	134	180	69	106	164	195	728	203	137	784	63
81	148th Ave NE	NE 24th St	109	948	236	593	1127	108	126	333	82	332	407	647
88	124th Ave NE	Northup Wy	160	1081	299	805	1097	349	348	401	54	208	615	506
117	120th Ave NE	Northup Wy	94	0	96	0	0	0	0	615	56	100	763	0
167	Spring Blvd	NE 12th St	0	0	0	1	0	313	128	922	0	0	677	3
196	130th Ave NE	Spring Blvd	0	391	54	70	493	0	0	0	0	7	0	66
197	132nd Ave NE	Spring Blvd	61	149	107	46	225	0	2	40	147	108	15	115
38	132nd Ave NE	Bel-Red Rd	28	192	100	44	267	190	199	913	143	68	1012	77
175	134th Ave NE	Bel-Red Rd	19	76	94	53	136	94	56	979	26	144	1093	92
252	132nd Ave NE	NE 20th St	124	0	124	0	0	0	0	970	163	64	991	0
149	124th Ave NE	Spring Blvd	6	441	6	10	369	606	552	1	42	4	3	10
168	120th Ave NE	Spring Blvd	28	401	24	21	254	193	116	40	6	24	85	56
185	136th Pl NE	Northup Way/NE 20th St	89	0	249	0	0	0	0	1059	81	213	929	0
279	148th Ave NE	SR 520 Ramps	0	0	0	0	1227	0	0	0	622	0	0	0
177	120th Ave NE	Bel-Red Rd	65	479	60	86	786	48	41	9	16	29	3	19
58	Bel-Red Rd	NE 20th St	10	238	299	10	522	130	75	576	1	236	399	28
62	156th Ave NE	Northup Wy	222	475	81	298	965	88	82	335	479	110	251	58

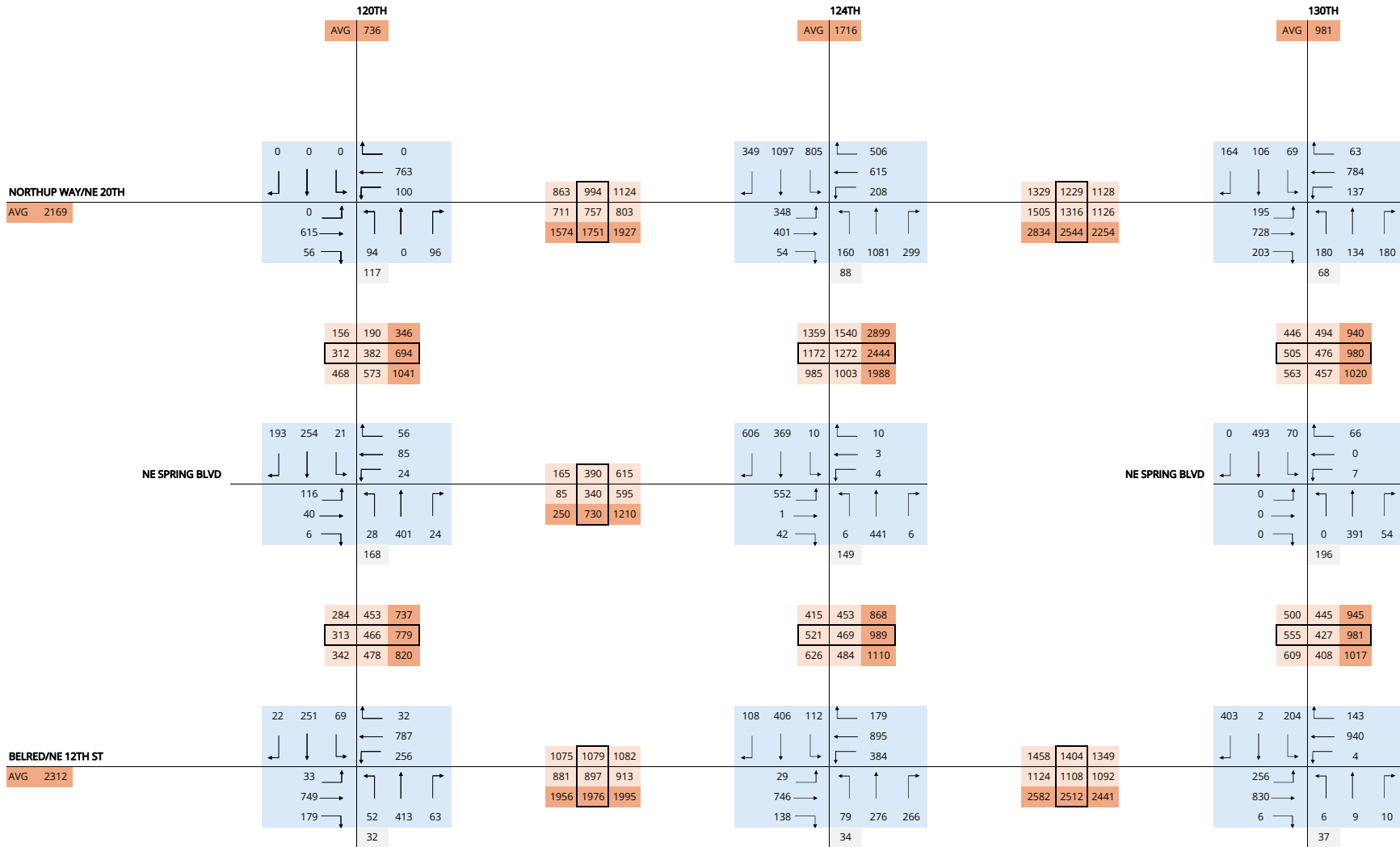
2044 Preferred Alternative

Area 1b BelRed

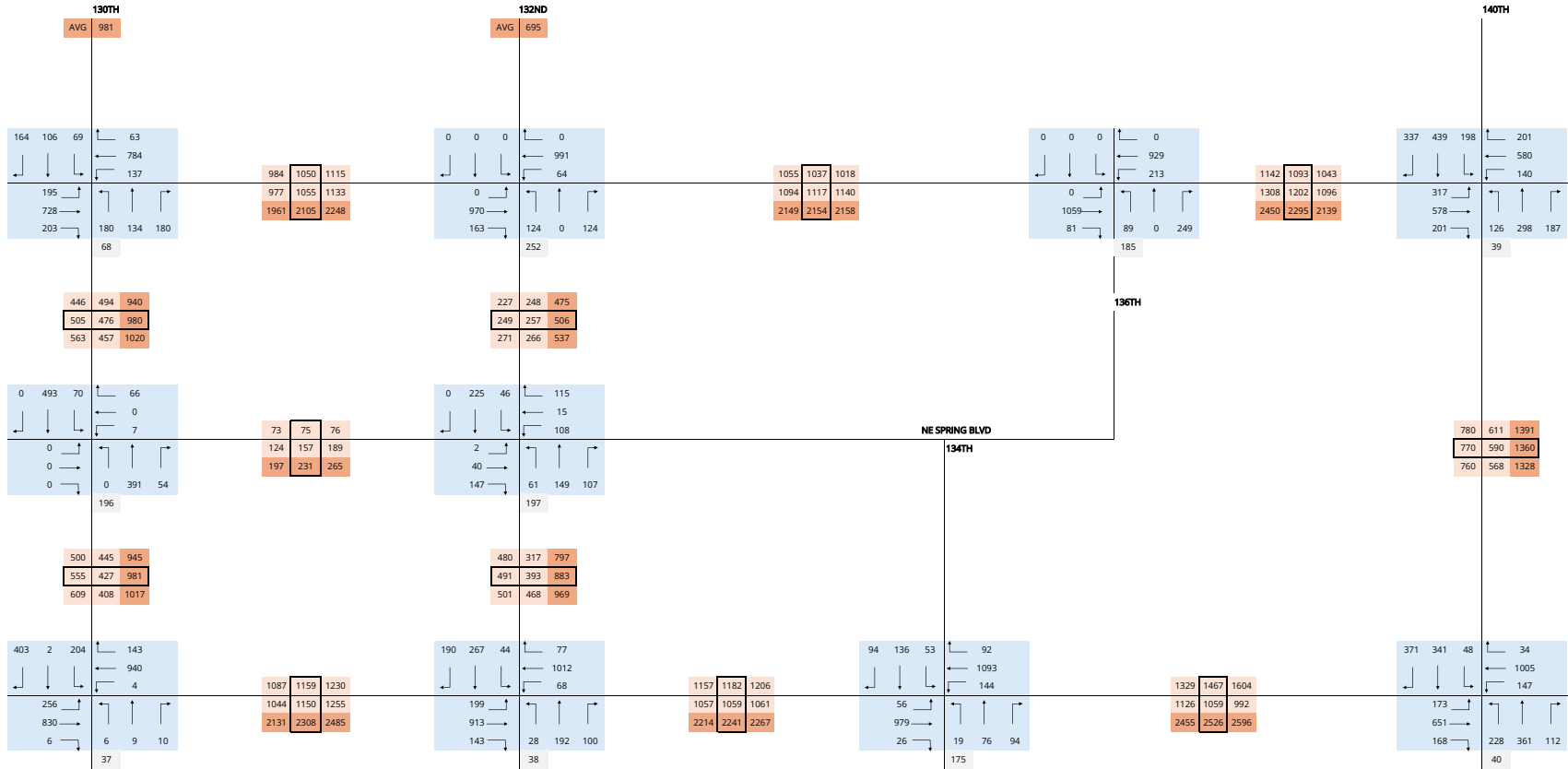
Int	NS Street	EW Street	NB			SB			EB			WB		
			LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
29	116th Ave NE	NE 12th St	80	1233	617	544	1861	271	565	1061	102	418	1987	257
32	120th Ave NE	NE 12th St	34	542	32	140	429	58	136	1196	241	235	1121	90
34	124th Ave NE	Bel-Red Rd	125	619	383	180	592	190	66	1091	184	406	1140	323
37	130th Ave NE	Bel-Red Rd	5	8	11	340	2	427	298	1229	5	5	1381	259
39	140th Ave NE	NE 20th St	154	374	243	317	690	508	421	798	272	221	883	312
40	140th Ave NE	Bel-Red Rd	220	525	151	140	560	765	284	991	145	152	1305	67
47	148th Ave NE	NE 20th St	229	928	58	325	1465	180	258	697	141	262	885	158
48	148th Ave NE	Bel-Red Rd	438	960	183	68	1482	309	235	784	354	204	957	25
59	Bel-Red Rd	NE 24th St	3	428	184	5	657	348	314	1170	169	220	651	10
60	156th Ave NE	Bel-Red Rd	20	583	315	182	1003	300	206	584	38	276	652	104
61	156th Ave NE	NE 24th St	204	758	142	225	1077	66	68	833	452	127	580	142
68	130th Ave NE	Northup Wy	217	224	269	145	190	279	331	1110	264	198	1071	119
81	148th Ave NE	NE 24th St	156	1046	198	685	1439	212	260	522	143	338	637	782
88	124th Ave NE	Northup Wy	204	1373	302	861	1198	471	865	792	109	230	841	690
117	120th Ave NE	Northup Wy	350	0	279	0	0	0	0	860	188	198	812	0
167	Spring Blvd	NE 12th St	0	0	0	2	0	476	207	1574	0	0	1035	5
196	130th Ave NE	Spring Blvd	0	409	141	167	611	0	0	0	0	31	0	220
197	132nd Ave NE	Spring Blvd	205	292	37	201	436	0	33	130	214	18	58	249
38	132nd Ave NE	Bel-Red Rd	34	276	162	65	358	211	258	1345	190	127	1559	139
175	134th Ave NE	Bel-Red Rd	77	213	150	55	243	244	135	1359	63	142	1556	91
252	132nd Ave NE	NE 20th St	171	0	322	0	0	0	0	1297	320	237	1331	0
149	124th Ave NE	Spring Blvd	45	1137	13	3	445	661	297	0	77	7	5	5
168	120th Ave NE	Spring Blvd	35	806	14	17	524	325	224	23	9	38	110	119
185	136th Pl NE	Northup Way/NE 20th St	181	0	312	0	0	0	0	1422	161	299	1435	0
279	148th Ave NE	SR 520 Ramps	0	0	0	0	1235	0	0	0	1001	0	0	0
177	120th Ave NE	Bel-Red Rd	76	592	157	148	901	37	34	15	18	48	3	22
58	Bel-Red Rd	NE 20th St	25	462	506	11	720	209	130	864	2	404	795	44
62	156th Ave NE	Northup Wy	540	874	118	308	1192	153	141	455	778	147	472	82

PM peak hour turning movement volumes provided by City of Bellevue 4/9/2025

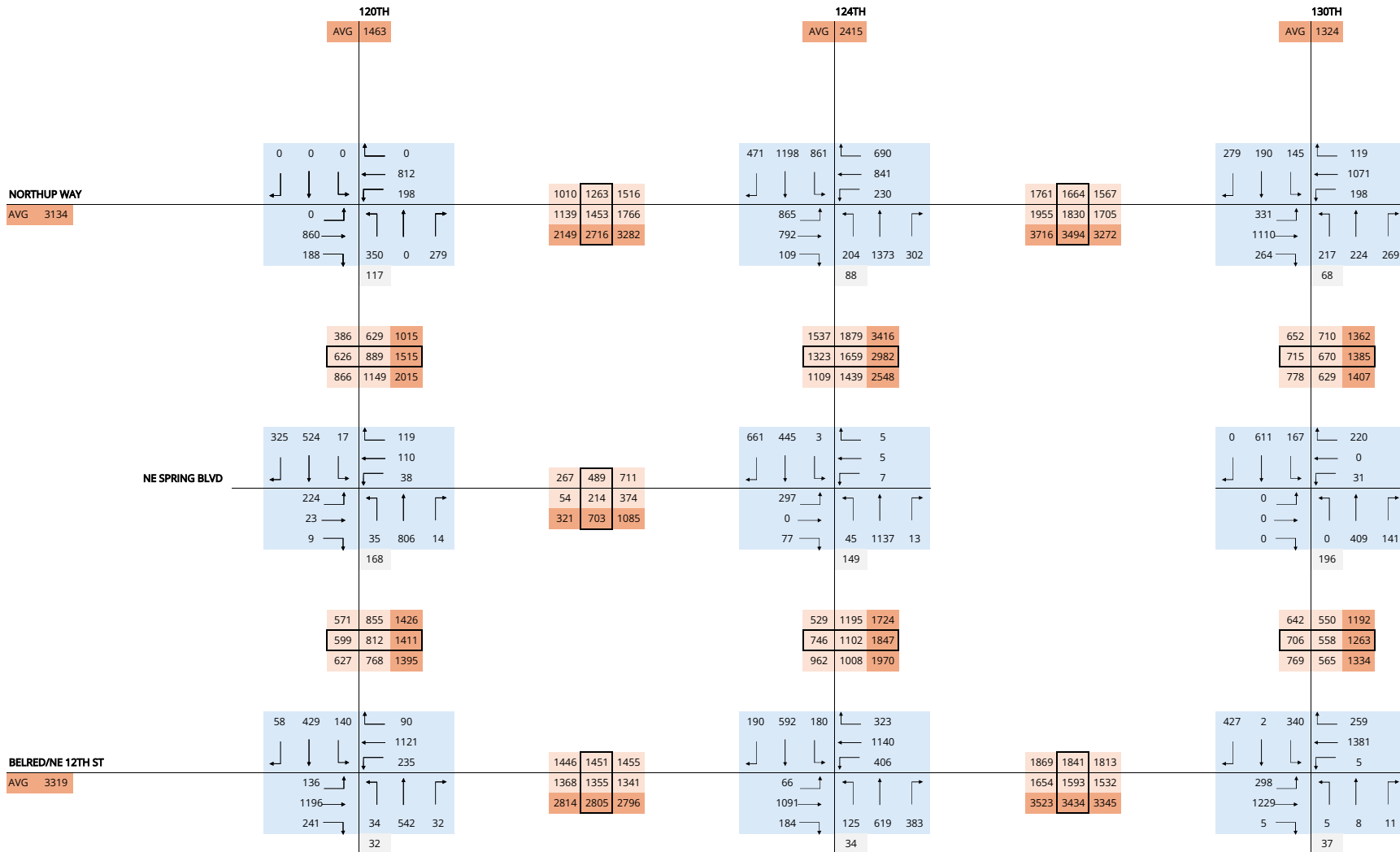
2044 Preferred Growth Alternative (120th Ave NE - 130th Ave NE)



2044 Preferred Growth Alternative (130th Ave NE - 140th Ave NE)



2044 Preferred Alternative (120th Ave NE - 130th Ave NE)

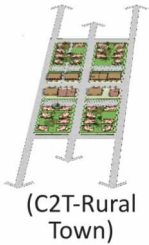


ATTACHMENT B

Detailed QLOS Criteria and Adjustments

C2T, C4, C5, & C6

Motor Vehicle Arterial Generalized Service Volume Tables



(C2T-Rural Town)

Peak Hour Directional

	B	C	D	E
1 Lane	*	720	940	**
2 Lane	*	1,140	1,640	**
3 Lane	*	2,120	2,510	**

Peak Hour Two-Way

	B	C	D	E
2 Lane	*	1,310	1,710	**
4 Lane	*	2,070	2,980	**
6 Lane	*	3,850	4,560	**

AADT

	B	C	D	E
2 Lane	*	13,800	18,000	**
4 Lane	*	21,800	31,400	**
6 Lane	*	40,500	48,000	**



(C4-Urban General)

	B	C	D	E
1 Lane	*	*	870	1,190
2 Lane	*	1,210	1,790	2,020
3 Lane	*	2,210	2,810	2,990
4 Lane	*	2,590	3,310	3,510

	B	C	D	E
2 Lane	*	*	1,580	2,160
4 Lane	*	2,200	3,250	3,670
6 Lane	*	4,020	5,110	5,440
8 Lane	*	4,710	6,020	6,380

	B	C	D	E
2 Lane	*	*	17,600	24,000
4 Lane	*	24,400	36,100	40,800
6 Lane	*	44,700	56,800	60,400
8 Lane	*	52,300	66,900	70,900

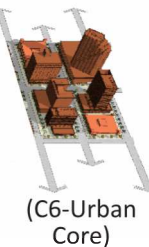


(C5-Urban Center)

	B	C	D	E
1 Lane	*	*	690	1,080
2 Lane	*	1,290	1,900	2,130
3 Lane	*	1,410	2,670	3,110
4 Lane	*	2,910	3,560	3,640

	B	C	D	E
2 Lane	*	*	1,250	1,960
4 Lane	*	2,350	3,450	3,870
6 Lane	*	2,560	4,850	5,650
8 Lane	*	5,290	6,470	6,620

	B	C	D	E
2 Lane	*	*	13,900	21,800
4 Lane	*	26,100	38,300	43,000
6 Lane	*	28,400	53,900	62,800
8 Lane	*	58,800	71,900	73,600



(C6-Urban Core)

	B	C	D	E
1 Lane	*	***	790	1,030
2 Lane	*	***	1,490	1,920
3 Lane	*	***	2,730	2,940
4 Lane	*	***	3,250	3,490

	B	C	D	E
2 Lane	*	***	1,440	1,870
4 Lane	*	***	2,710	3,490
6 Lane	*	***	4,960	5,350
8 Lane	*	***	5,910	6,350

	B	C	D	E
2 Lane	*	***	16,000	20,800
4 Lane	*	***	30,100	38,800
6 Lane	*	***	55,100	59,400
8 Lane	*	***	65,700	70,600

Adjustment Factors

The peak hour directional service volumes should be adjusted by multiplying by 1.2 for one-way facilities
 The AADT service volumes should be adjusted by multiplying 0.6 for one way facilities
 2 Lane Divided Roadway with an Exclusive Left Turn Lane(s): Multiply by 1.05
 2 lane Undivided Roadway with No Exclusive Left Turn Lane(s): Multiply by 0.80

Exclusive right turn lane(s): Multiply by 1.05
 Multilane Undivided Roadway with an Exclusive Left Turn Lane(s): Multiply by 0.95
 Multilane Roadway with No Exclusive Left Turn Lane(s): Multiply by 0.75
 Non-State Signalized Roadway: Multiply by 0.90

This table does not constitute a standard and should be used only for general planning applications. The table should not be used for corridor or intersection design, where more refined techniques exist.
 *Cannot be achieved using table input value defaults. **Not applicable for that level of service letter grade. For the automobile mode, volumes greater than level of service D become F because intersection capacities have been reached.
 ***LOS C thresholds are not applicable for C6 as C6 roadway facilities are neither planned nor designed to achieve automobile LOS C.

ATTACHMENT C

Roadway Segment LOS Calculation Worksheets

2044 Preferred Growth Alternative

<i>General Roadway Information</i>					<i>Baseline Inputs</i>		<i>Adjustments</i>		<i>Baseline LOS Thresholds (No Adj.)</i>			<i>Adjusted LOS Thresholds</i>			<i>Roadway Segment LOS</i>
<i>Roadway</i>	<i>From</i>	<i>To</i>	<i>Seg ID</i>	<i>Land Category</i>	<i>Peak Hour Two-Way Volumes</i>	<i># of Lanes</i>	<i>Non-State Signalized Roadway</i>	<i>Adj. Factor</i>	<i>LOS C</i>	<i>LOS D</i>	<i>LOS E</i>	<i>LOS C</i>	<i>LOS D</i>	<i>LOS E</i>	
BelRed Road	120th Ave NE	140th Ave NE	1	C5-Urban Center	2312	4	Yes	0.9	2350	3450	3870	2115	3105	3483	D
Northup Way	120th Ave NE	140th Ave NE	2	C5-Urban Center	2169	4	Yes	0.9	2350	3450	3870	2115	3105	3483	D
120th Ave NE	BelRed Road	Northup Way	3	C5-Urban Center	736	4	Yes	0.9	2350	3450	3870	2115	3105	3483	C
124th Ave NE	BelRed Road	Northup Way	4	C5-Urban Center	1716	4	Yes	0.9	2350	3450	3870	2115	3105	3483	C
130th Ave NE	BelRed Road	Northup Way	5	C5-Urban Center	981	2	Yes	0.9	-	1250	1960	-	1125	1764	D
132nd Ave NE	BelRed Road	Northup Way	6	C5-Urban Center	695	2	Yes	0.9	-	1250	1960	-	1125	1764	D
140th Ave NE	BelRed Road	Northup Way	7	C5-Urban Center	1360	4	Yes	0.9	2350	3450	3870	2115	3105	3483	C

2044 Preferred Alternative

<i>General Roadway Information</i>					<i>Baseline Inputs</i>		<i>Adjustments</i>		<i>Baseline LOS Thresholds (No Adj.)</i>			<i>Adjusted LOS Thresholds</i>			<i>Roadway Segment LOS</i>
<i>Roadway</i>	<i>From</i>	<i>To</i>	<i>Seg ID</i>	<i>Land Category</i>	<i>Peak Hour Two-Way Volumes</i>	<i># of Lanes</i>	<i>Non-State Signalized Roadway</i>	<i>Adj. Factor</i>	<i>LOS C</i>	<i>LOS D</i>	<i>LOS E</i>	<i>LOS C</i>	<i>LOS D</i>	<i>LOS E</i>	
BelRed Road	120th Ave NE	140th Ave NE	1	C5-Urban Center	3319	4	Yes	0.9	2350	3450	3870	2115	3105	3483	E
Northup Way	120th Ave NE	140th Ave NE	2	C5-Urban Center	3134	4	Yes	0.9	2350	3450	3870	2115	3105	3483	E
120th Ave NE	BelRed Road	Northup Way	3	C5-Urban Center	1463	4	Yes	0.9	2350	3450	3870	2115	3105	3483	C
124th Ave NE	BelRed Road	Northup Way	4	C5-Urban Center	2415	4	Yes	0.9	2350	3450	3870	2115	3105	3483	D
130th Ave NE	BelRed Road	Northup Way	5	C5-Urban Center	1324	2	Yes	0.9	-	1250	1960	-	1125	1764	E
132nd Ave NE	BelRed Road	Northup Way	6	C5-Urban Center	1193	2	Yes	0.9	-	1250	1960	-	1125	1764	E
140th Ave NE	BelRed Road	Northup Way	7	C5-Urban Center	2148	4	Yes	0.9	2350	3450	3870	2115	3105	3483	D

Nesse, Katherine

From: John Thomas <jthomas@nbbj.com>
Sent: Wednesday, May 27, 2026 11:01 AM
To: PlanningCommission
Cc: roger white; Holly D. Golden
Subject: Comments to Draft LUCA
Attachments: 2026 05 27 LUCA Comment Letter - Planning Commission.pdf

You don't often get email from jthomas@nbbj.com. [Learn why this is important](#)

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Please forward this comment letter to Planning Commissioners for the meeting tonight. Thank you!

Best regards,

John H. Thomas, AIA, LEED AP BD + C Principal | Architect

NBBJ 223 Yale Avenue North, Seattle, WA 98109
Direct: 206.621.2268 Mobile: 206.851.6276
nbbj.com



TIME100 Most Influential Company
Fast Company Most Innovative Architecture Firm
2X 2025 AIA National Honor Award Recipient

May 27, 2026

Roger White
Lexington Pacific
PO Box 5043
Bellevue, Washington 98109

Re: LUCA Draft Comments

Dear Mr. White,

We have reviewed the site context and proposed LUCA code updates, and have the following comments for your information and use:

BelRed Look Forward LUCA — Proposed Comments to LUCA Strike Draft, 116th Ave NE Corridor Neighborhood District

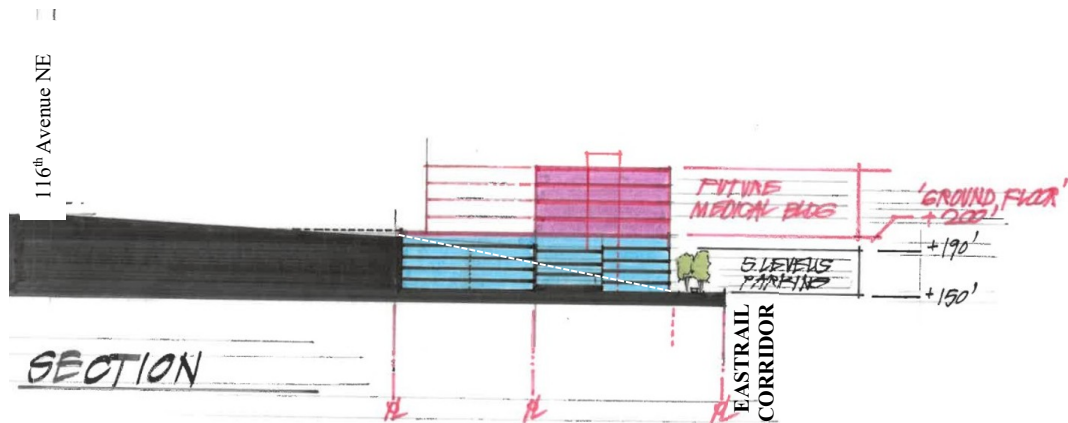
Site Context:

- Proposed Zoning: MUM-H (Mixed-Use Medical Highrise)
- Subject site slopes steeply from west (116th Ave NE) to east
- The project is anticipated in two phases. Phase 1 is the parking garage; Phase 2 is a potential medical office building or other appropriate use above the parking garage.
- The east face of the Phase 1 parking garage is fully exposed and faces directly onto the Eastrail Corridor
- Eastrail is explicitly defined as an "access corridor" under the proposed code (LUC 20.50.010), triggering the full range of active use, habitable space, screening, frontage path, and nonmotorized access requirements
- The Eastrail through Bellevue is under active development, with trail connections to NE 12th Street expected to open in 2027



Parking Structure — Eastrail-Facing East Facade (LUC 20.25B.040.D.2):

- The 20-foot habitable ground-floor depth will apply to the east face because Eastrail is an access corridor
- On a steep slope, the garage ground floor at the Eastrail grade may be 30 to 50+ feet below the 116th Avenue NE grade — creating a condition where ground-floor habitable space is physically disconnected from the primary building entry, street access, and Phase 2 uses above
- The code should provide a grade-differential threshold (e.g., where the Eastrail grade is more than 20 feet below the primary street grade) that triggers alternative compliance options rather than strict habitable-space requirements in above-grade parking garages
- Alternative compliance could include enhanced landscape treatment, public art, green walls, or trail-level amenities that serve Eastrail users without requiring fully habitable commercial space at an inaccessible elevation



Active Use Requirements Along Eastrail (LUC 20.25C.030.B / 20.25D.030.B):

- A 75% active-use requirement along the Eastrail-facing facade of a below-grade parking garage is impractical and unachievable in Phase 1
- Active uses require 12-foot floor-to-ceiling heights, 20-foot depth, 75% transparency, and weather protection — these standards assume a street-level commercial storefront condition, not a multi-story garage wall at the bottom of a slope
- Suggest that the code allow deferral of active-use obligations on Eastrail-facing facades to Phase 2 when the medical office building above can provide meaningful activation at a grade connected to the trail
- Alternatively, the code should recognize that trail-oriented amenities (seating, landscaping, public art, bike parking, trailhead facilities) can satisfy the activation intent without requiring traditional commercial active uses

Nonmotorized Access to Eastrail (LUC 20.25C.020.C.2):

- The requirement to provide nonmotorized access every 350 feet of Eastrail frontage is reasonable in principle but must account for vertical grade separation
- The code should allow the Director to modify the 350-foot interval and approve alternative access configurations where topography makes standard spacing impractical, consistent with the existing provision at LUC 20.25C.020.C.2.e

Green Factor & Phased Amenity Proportionality:

- The Phase 1 garage roof/deck will serve as the Phase 2 building platform — permanent landscaping installed in Phase 1 will be demolished during Phase 2 construction
- The code should allow deferred Green Factor compliance for phased projects with an approved MDP
- Eastrail-facing landscape improvements at the base of the slope (which would survive both phases) should be eligible to count toward Green Factor compliance as an alternative to rooftop plantings that will not persist

Suggested Code Modifications — Summary:

1. Add a **grade-differential threshold** for Eastrail-facing facades that triggers alternative compliance options for habitable space, active use, and screening requirements
2. Allow **deferral of active-use obligations** on Eastrail frontage to a later phase when meaningful street-level activation can be achieved
3. Recognize **trail-oriented amenities** (trailhead improvements, bike parking, seating, public art, green walls) as satisfying active-use intent along Eastrail where traditional commercial storefronts are infeasible due to topography
4. Allow the Director to **modify nonmotorized access intervals** where vertical grade separation makes standard 350-foot spacing impractical
5. Add a **deferred Green Factor compliance pathway** for phased projects where Phase 1 improvements will be removed during Phase 2
6. Add **steep topography and grade-separated Eastrail frontage** as explicitly recognized grounds for Administrative Departure under LUC 20.25B.010.D.3

Best regards,



John H. Thomas, AIA
Principal

Cc: Bellevue Planning Commission

Nesse, Katherine

From: Rex Wasserman <rex@timber.partners>
Sent: Wednesday, May 27, 2026 2:41 PM
To: PlanningCommission
Cc: Jessica Clawson; Tim Gokhman; Sheldon Oppermann
Subject: BelRed LUCA Comments - Timber + Partners
Attachments: 2026 05 27 - Timber + Partners Planning Commission Meeting Letter - EXTERNAL.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from rex@timber.partners. [Learn why this is important](#)

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Please find attached comments on the BelRed LUCA process.

Thanks,
Rex



May 27, 2026

Bellevue Planning Commission
City of Bellevue
450 110th Ave NE
Bellevue, WA 98004
United States of America

RE: BelRed Look Forward Land Use Code Amendment - Public Comment

Dear Chair Khanloo and Members of the Bellevue Planning Commission,

The latest BelRed LUCA draft reflects real responsiveness to stakeholder input, and we greatly appreciate all of the work staff has put into making this a successful process. The Bellevue City Staff team is truly world class and we have been very impressed by their work so far. Our team has a few comments we wish to contribute to this ongoing discussion.

We are very excited about the potential of developing in Bellevue. We think that there is a unique opportunity to develop a project that leverages the City's vision for the area to create gravitational pull. We have outlined a vision in the attachments below but note that without the requested changes to the LUCA it will be difficult or impossible for us to execute on the vision.

1. Road Network

- a. We strongly support expanding staff authority to approve alternative street network configurations, including substituting Local Streets with other approved street typologies where a master-planned development interferes with the mapped grid but otherwise satisfies the block size and connectivity requirements of the LUCA. *Rigid adherence to the mapped grid on master-planned sites forecloses better urban design outcomes that the block-size standard itself is designed to produce.*
- b. We ask the Commission to update the Local Street map to resolve parcels where the mapped grid would render sites undevelopable due to physical constraints — grade, critical areas, parcel dimensions, or utility conflicts. Identifying and resolving these conflicts before LUCA adoption — rather than during individual project entitlement — provides developers with the certainty needed to move forward in the area.
- c. We ask the Planning Commission to discuss making Active Transportation Access Corridors and Enhanced Shared-Use Paths available as public typologies.
- d. We have outlined a brief study of the potential impact of the currently proposed Local Street grid on a potential project in the BelRed neighborhood. The red boxes outline the proposed Local Street requirement (which we note would essentially be impossible to implement given the nearly 35 foot grade change on the site).



3. Green Building Certification Programs

a. §20.20.420 currently provides no timeline for the Director's tiered certification list. This creates uncertainty for every project currently in design. Embodied carbon is not currently required as a criterion. Some certification programs do not measure it, which means the LUCA's sustainability framework may not recognize the benefits of construction types the City otherwise wants to encourage, including mass timber. We ask that the selected certification programs be required to incorporate embodied carbon. We also ask that the LUCA require the Director to publish, update, or confirm the tiered list within 60 days after the BelRed LUCA is finalized to ensure that there is clarity for the community in a timely manner.

4. Expand the FAR Exemption List for Arts and Cultural Uses

a. If the goal is a lasting arts ecosystem in the BelRed station area, we respectfully suggest that the FAR exemption list (§20.25B.050.C) expand to include the space types that ecosystem actually needs: small art galleries, arts-oriented retail, maker spaces, rehearsal rooms, black box theatres, and similar cultural spaces. These types of uses are very important for the community and are complementary to the non-profit uses that are currently given FAR exemptions. Without FAR exemption, they compete with market-rate uses on a square-foot basis and unfortunately they lose every time.

Thank you for your time and for the thoughtful work that has gone into this draft. We ask that the Planning Commission consider recommending a another study session is necessary to fine tune the points outlined above.

We look forward to continued engagement and the balance of the LUCA process and are happy to provide additional analysis or information on any of the items above.

Respectfully,

A handwritten signature in black ink, appearing to read "Tim Gokhman".

Tim Gokhman
Chief Executive Officer
Timber + Partners

Attachment 1:



Attachment 2:



Nesse, Katherine

From: Jessica Clawson <jessica@mhseattle.com>
Sent: Wednesday, May 27, 2026 3:02 PM
To: PlanningCommission
Cc: Gallant, Kristina; Nesse, Katherine
Subject: PC letter May 28 2026
Attachments: PC letter May 28 2026.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Hi Chair Khanloo and Commissioners—please see my comment letter, attached. I’ve also copied the letter below for ease of review as well. Thanks!

VIA EMAIL

Bellevue Planning Commission
Email: planningcommission@bellevuewa.gov

Subject: Bel-Red Code –Request to Defer Public Hearing and Keep Working!

Chair Khanloo and Commissioners:

I am writing on behalf of several clients active in the Bel-Red corridor. We appreciate the significant effort that staff and the Commission have invested in advancing this code update and the willingness to engage with stakeholders throughout the process. However, we respectfully urge the Commission **not to move the Bel-Red code to public hearing at this time.** The proposal is not yet ready, as it continues to present fundamental policy and implementation issues that must be addressed before proceeding.

1. Mandatory Street Grid Requirements.

The most significant unresolved issue is the required street grid. As currently structured, the grid is being treated as a fixed requirement rather than a planning choice. It is important to be clear: this level of street infrastructure is **not required to meet transportation demand**, but instead represents a discretionary urban design framework that is **not physically feasible to achieve**. There are grade changes, critical areas, property ownership, and development timing issues that will never be solved by private parties in Bel-Red, no matter the “flexibility” built into the code. These issues are the same ones that Bel-Red has grappled with since 2008 when the code was first conceived. These issues have never been resolved and will never be resolved by the private sector. The Planning Commission should step up and ask real questions about why actual streets, rather than bike and ped connectivity, are still being required of private developers. Bluntly, the only party that can force a street grid to be built is the City, by taking the property and constructing the infrastructure. It is telling that the City isn’t choosing this path—because it is too expensive—and it will result in a disjointed mess of a situation in Bel-Red. We have already lived through this once, we should not relive this again!

The City has placed the burden of building public infrastructure in a tidy grid on private developers. Requiring individual projects to shoulder these improvements materially impacts project feasibility and forces tradeoffs, if the projects are even built at all. In particular, having to spend money on the street grid will crowd out other

priorities that the City has identified for Bel-Red, including **space for arts uses, cultural amenities, and affordable housing** that define the vision for the district.

We respectfully recommend that the Commission **eliminate the mandatory street grid requirement** and instead allow projects to determine appropriate connectivity and access based on site-specific conditions, subject to clear but flexible standards. Expanding the “public road” options to include a woonerf-like typology could also assist in the viability of connectivity; this is currently not allowed by the code. This approach would better align infrastructure delivery with feasibility and actual need.

2. Incentive Structure Does Not Reflect Project Cost Realities.

The second major issue is the structure of the incentive system. As currently drafted, the code does not appropriately offset significant project costs that are required by this and other codes.

For example, where Goff Creek is already open on a site, restoring the creek in a manner consistent with the Critical Areas Code does not qualify for incentive points; the code currently requires a project “go above and beyond” to obtain amenity points. Yet even the most basic creek restoration is a significant cost and inherently a public benefit—failing to offset this cost, in addition to the other costs already required by the code, results in a project that is not financially feasible. Failing to recognize these inherent costs within the incentive framework undermines the effectiveness of the system.

More broadly, projects in Bel-Red are being asked to deliver a wide range of costly improvements—street infrastructure, creek restoration, affordable housing, street level retail, among others—without a commensurate framework for offsetting those costs. As a result, the code risks producing the opposite of its intended outcome. When faced with competing requirements, projects will necessarily prioritize those that are mandatory at the expense of discretionary elements that the City seeks to incentivize—particularly **arts spaces, parks, and public-oriented uses**.

The City should undertake a more grounded and transparent assessment of development costs and recalibrate the incentive system accordingly. It is not feasible for every project to deliver every “goodie” desired by the City; the code must establish clear priorities and align incentives with those priorities.

Conclusion

The Bel-Red subarea represents one of Bellevue’s best opportunities for thoughtful, mixed-use urban development. Getting the regulatory framework right is critical. At present, the code attempts to achieve too many objectives simultaneously without adequately accounting for the sheer costs of constructing to the base code.

For these reasons, we respectfully request that the Planning Commission **defer moving this proposal to public hearing** and direct additional work to:

- Reevaluate and remove the mandatory street grid requirement, replacing it with a more flexible, performance-based approach; and
- Reform the incentive structure to accurately reflect required project costs and to prioritize the outcomes the City most wants to achieve.
- Consider a catalyst program that catalyzes and directly offsets the costs of the most difficult to achieve outcomes—namely, arts spaces and environmental benefits--that will result in the Bel-Red neighborhood not becoming just another cookie cutter new development area.

We appreciate your consideration and hope to continue working with staff and the Commission to refine these provisions.

Sincerely,

Jessie Clawson

May 28, 2026

VIA EMAIL

Bellevue Planning Commission
Email: planningcommission@bellevuewa.gov

Subject: Bel-Red Code –Request to Defer Public Hearing and Keep Working!

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The City has placed the burden of building public infrastructure in a tidy grid on private developers. Requiring individual projects to shoulder these improvements materially impacts project feasibility and forces tradeoffs, if the projects are even built at all. In particular, having to spend money on the street grid will crowd out other priorities that the City has identified for Bel-Red, including **space for arts uses, cultural amenities, and affordable housing** that define the vision for the district.

We respectfully recommend that the Commission **eliminate the mandatory street grid requirement** and instead allow projects to determine appropriate connectivity and access based on site-specific conditions, subject to clear but flexible standards. This approach would better align infrastructure delivery with feasibility and actual need.

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For example, where Goff Creek is already open on a site, restoring the creek in a manner consistent with the Critical Areas Code does not qualify for incentive points; the code currently requires a project “go above and beyond” to obtain amenity points. Yet even the most basic creek restoration is a significant cost and inherently a public benefit—failing to offset this cost, in addition to the other costs already required by the code, results in a project that is not financially feasible. Failing to recognize these inherent costs within the incentive framework undermines the effectiveness of the system.

More broadly, projects in Bel-Red are being asked to deliver a wide range of costly improvements—street infrastructure, creek restoration, affordable housing, street level retail, among others—without a commensurate framework for offsetting those costs. As a result, the code risks producing the opposite of its intended outcome. When faced with competing requirements, projects will necessarily prioritize those that are mandatory at the expense of discretionary elements that the City seeks to incentivize—particularly **arts spaces, parks, and public-oriented uses**.

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Conclusion

The Bel-Red subarea represents one of Bellevue’s best opportunities for thoughtful, mixed-use urban development. Getting the regulatory framework right is critical. At present, the code attempts to achieve too many objectives simultaneously without adequately accounting for the sheer costs of constructing to the base code.

For these reasons, we respectfully request that the Planning Commission **defer moving this proposal to public hearing** and direct additional work to:

- Reevaluate and remove the mandatory street grid requirement, replacing it with a more flexible, performance-based approach; and
- Reform the incentive structure to accurately reflect required project costs and to prioritize the outcomes the City most wants to achieve.
- Consider a catalyst program that catalyzes and directly offsets the costs of the most difficult to achieve outcomes—namely, arts spaces and environmental benefits—that will result in the Bel-Red neighborhood not becoming just another cookie cutter new development area.

We appreciate your consideration and hope to continue working with staff and the Commission to refine these provisions.

May 27, 2026
Page 3

Sincerely,

Jessie Clawson

Nesse, Katherine

From: Yichuan Zhao <YichuanZ@imaginehousing.org>
Sent: Wednesday, May 27, 2026 3:53 PM
To: PlanningCommission
Subject: BelRed Street Grid

You don't often get email from yichuanz@imaginehousing.org. [Learn why this is important](#)

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Bellevue Planning Commission,

As you review the BelRed code, I ask that you take careful consideration of the street grid. The current layout cuts directly through our parcel at 132nd and continues to be a pretty significant barrier to development of the site. While we agree on making sure that BelRed is a connected neighborhood, we believe that we should be focused on a more multi-modal model. Or offering more flexible options to achieve the same level of connectedness. A rigid street grid will not only hamper Imagine Housing's ability to provide more affordable options, it will also hamper all development in the neighborhood. Thank you for your time and consideration on this matter.

Yi Zhao
President
425-521-5216

YichuanZ@Imaginehousing.org

Imagine Housing
1722 138th Place NE
Bellevue, WA 98005

P.S. We've moved!

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Nesse, Katherine

From: Brady Nordstrom <brady@housingconsortium.org>
Sent: Wednesday, May 27, 2026 4:22 PM
To: PlanningCommission
Cc: Nesse, Katherine; Gallant, Kristina; Whipple, Nicholas; Jesse Simpson; Allen Dauterman; cbuchanan@bellwetherhousing.org; Patience Malaba
Subject: HDH and EAHC Comment on BelRed - 5/27/2026
Attachments: HDC&EAHC_BelRed_Comment_5-27-2026_final.pdf

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Dear Bellevue Planning Commission,

Please see the attached letter as comment on the BelRed code update from the Housing Development Consortium (HDC) and the Eastside Affordable Housing Coalition (EAHC). These comments relate to your May 27, 2026 Planning Commission meeting.

Thank you for the consideration and the ongoing work to unlock affordable housing and growth in BelRed.

Best Regards,
Brady Nordstrom

--

Brady Nordstrom *(he/him)*
Associate Director of Government Relations and Policy
[Housing Development Consortium of Seattle-King County](#)
1326 5th Avenue, Suite 230 | Seattle, WA 98101
C: (253) 886-2099



**HOUSING
DEVELOPMENT**
consortium



May 27, 2026

Bellevue Planning Commission
450 110th Avenue NE
Bellevue, WA 98004

Subject: Comment on BelRed Look Forward LUCA for May 27, 2026, related to affordable housing, amenity incentive system, fee-in-lieu, and street grid

Dear Bellevue Planning Commission,

The Housing Development Consortium (HDC) and the Eastside Affordable Housing Coalition (EAHC) are grateful for the opportunity to comment on the BelRed land use code amendment topics being discussed at your May 27, 2026 study session. We thank Planning Commissioners and City Staff for ongoing conversations about ways to improve the code while meeting affordable housing goals and the neighborhood vision. **Please see our full comments below.**

We strongly support the staff-recommended affordable housing requirement approach as the only policy option in BelRed. This is justified by the sheer size of the upzone and other code benefits, such as the exemption of affordable housing FAR. This policy will also create consistency with HOMA areas and Wilburton. BelRed will see a significant increase to base and maximum FAR across zones as well as a meaningful expansion of the highest-density areas in BelRed. This neighborhood is among the most significant housing opportunities in Bellevue and the region, representing 7,900 housing units (~23% of city growth target) and 14,200 jobs (~20% of city growth target) by 2044. By affirming the staff recommended approach for affordable housing in BelRed, the Planning Commission can ensure that artists and moderate-wage workers are included in growth. This policy will also help meet Bellevue’s newly updated Affordable Housing Strategy goal of creating or preserving 5,700 housing units at or below 80% AMI over the next 10 years.

- In addition to the affordable housing requirement, we support adding other benefits for dedicated affordable housing projects, such as exempting 100% affordable housing projects from Design Review. This is already being recommended through the Affordable Housing Strategy and could be advanced for BelRed.

The success of affordable housing in BelRed is directly linked to the success of overall development in the neighborhood. Many barriers to development have already been removed in the current draft, however, some improvement areas remain. For the specific topics at your May 27th Planning Commission meeting, we recommend the following:

- **Amenity Incentive System.**
 - Overall, we support the staff position:
 - Thank you for removing the rigid tier system so that developers have flexibility to focus on amenities that make the most sense for the site.

**Housing Development Consortium
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101
206.682.9541 | www.housingconsortium.org

- We support the proposed approach that uses a set max height and then solely offers FAR as a bonus. This decreases the complexity of using the amenity incentive system.
 - We agree with affordable housing being included in the priority amenities for the art's intensive districts. Affordable housing is linked to other neighborhood goals, like creating a robust arts community, and must be a priority area.
 - We have some additional suggestions:
 - Make affordable housing a required amenity in arts intensive districts, not just one item in a menu.
 - Offer deeper incentives for lower AMI affordable housing units to ensure a feasible mix of AMI levels in the neighborhood.
- **Fee-in-lieu**
 - We support a fee-in-lieu schedule for the amenity incentive system that is predictable, flexible, and that centers affordable housing. We will have a more developed position on the fees once a fee schedule is released in a future draft of the code. Our comments for now include:
 - While there should be discretion for how fees are allocated in many cases, we support dedicating a portion of all amenity fees to affordable housing in BelRed. If any fees are collected from affordable housing amenities specifically, they should remain dedicated to affordable housing.
 - We support a reasonable maximum percentage cap on the amount of fee-in-lieu that can be paid per project.
 - Consider vesting fees at land use approval. This creates consistency with other parts of the code and helps create predictability for project financing.
- **Street Grid**
 - While we appreciate the reduction of required streets from previous maps and the contemplation of criteria to replace local streets with private streets, **we ultimately urge the Commission to consider solutions beyond the staff recommendations.**
 - **We support the replacement of the street grid network with a block perimeter performance-based standard.** This must include flexibility for multimodal transportation options (biking, walking), especially since the additional street network is about connection and permeability-- not vehicle capacity.
 - Private streets can meet the connectivity and access needs of the city, even when we consider tradeoffs. **This block perimeter performance-**

based standard would have contractual guardrails (ex: access easements, operational agreements, staff approvals, etc.). These guardrails ensure public access, uphold ongoing maintenance standards, and avoid island parcels from being created.

Thank you for centering affordable housing in your discussion of the BelRed code. This truly is a generational housing and growth opportunity for Bellevue. We look forward to more engagement with you over the coming weeks and months.

Sincerely,
Eastside Affordable Housing Coalition & HDC

Nesse, Katherine

From: Kevin Wallace <kwallace@wallaceproperties.com>
Sent: Wednesday, May 27, 2026 6:45 PM
To: PlanningCommission
Cc: Gallant, Kristina; Whipple, Nicholas
Subject: BelRed Code
Attachments: 2026-05-27_BelRed_AIS_Comparison.xlsx

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Dear Commissioners,

The May 18, 2016 BelRed Look Forward LUCA was updated from the original draft to reduce the Base FAR for properties in the MUM-H zone from 4.0 to 2.0, but only on the west side of 116th Ave. NE. This late addition has a dramatic impact on the ability to provide housing on the west side of the street, as compared to the east side of the street, and as compared to the MUO-H zone.

The dominant zones in the Bel-Red corridor are MUM-H, MUO-H and MUR-H. For residential, the base FAR's for each are:

- MUR-H: 6.0 Base. This effectively means that MUR-H has no amenity point obligation, because even on a smaller site, achieving 6.0 FAR is difficult because all of the other constraints must be complied with too (height, floorplate, setback, etc.).
- MUO-H: 4.0 Base. Very little amenity point requirement, especially on a large site because the larger the site the lower the FAR (internal driveways required, for example).
- MUM-H West Side: 4.0 Base. Same as MUO-H.
- MUM-H West Side: 2.0 Base. Very heavy amenity point requirements and far out of scale with the rest of the area.

I attached a spreadsheet that compares a 4.5 FAR apartment project in each of these zones, looking at the requirements if each amenity point option were used to attain all of the required amenity points.

The MUR-H zone has no requirement at all. If you're on the east side of 116th and use public art it's \$1,350,000 less expensive than if you're building the same building directly across the street.

There is no reasonable justification for this requirement, and it will deter viable housing production in BelRed, in contravention of Council direction and Comprehensive Plan policies.

Please request that staff either amend the code by deleting footnote 6 and requiring a consistent 4.0 Base FAR in the MUM-H zone, or provide it as an alternative for your consideration and up or down vote.

BelRed LUCA — AIS Amenity Requirements by Land Use Dist

50,000 SF lot · 4.5 FAR target · 225,000 GSF building · LUC 20.25D.050.C · May 18, 2021

PROJECT PARAMETERS

	West MUM-H (116th Ave NE — west side)	(116th Ave NE — east side)
Residential Base FAR	2.0	
Target FAR	4.5	
FAR Above Base (Residential)	2.5	
Lot Size	50,000 SF	
Building GFA	225,000 GSF	
Total AIS Points Required	125,000	

AIS AMENITY REQUIREMENTS — required quantity if all points sourced from a single option

AIS Option	Point Rate (116th NE Corridor)	West MUM-H 125,000 pts required	25,000 pts required
Public Art ¹	73.37 pts / \$1,000	\$1,704,000	
Outdoor Plaza ¹	8.8 pts / SF	14,205 SF	
Green Building — LEED Silver ¹	0.33 pts / GSF	Not achievable ² max 74,250 pts (59% of req.)	y
Green Building — LEED Gold ¹	0.44 pts / GSF	Not achievable ² max 99,000 pts (79% of req.)	y
Affordable Housing @ 80% AMI	4 pts / GSF	31,250 GSF	
Affordable Housing @ 60% AMI	6 pts / GSF	20,833 GSF	
Affordable Housing @ 40% AMI	8 pts / GSF	15,625 GSF	
Park Dedication	45 pts / \$1,000 FMV	\$2,778,000 FMV	
Trail Dedication ³	3 pts / SF	41,667 SF	
Stream Restoration	66.7 pts / \$1,000 cost	\$1,875,000	
Natural Drainage ³	0.7 pts / SF	178,571 SF	
TDR	Rate TBD	TBD	

20.20.010 Uses in land use districts dimensional requirements.

Chart 20.20.010 Uses in land use districts – Dimensional Requirements

...

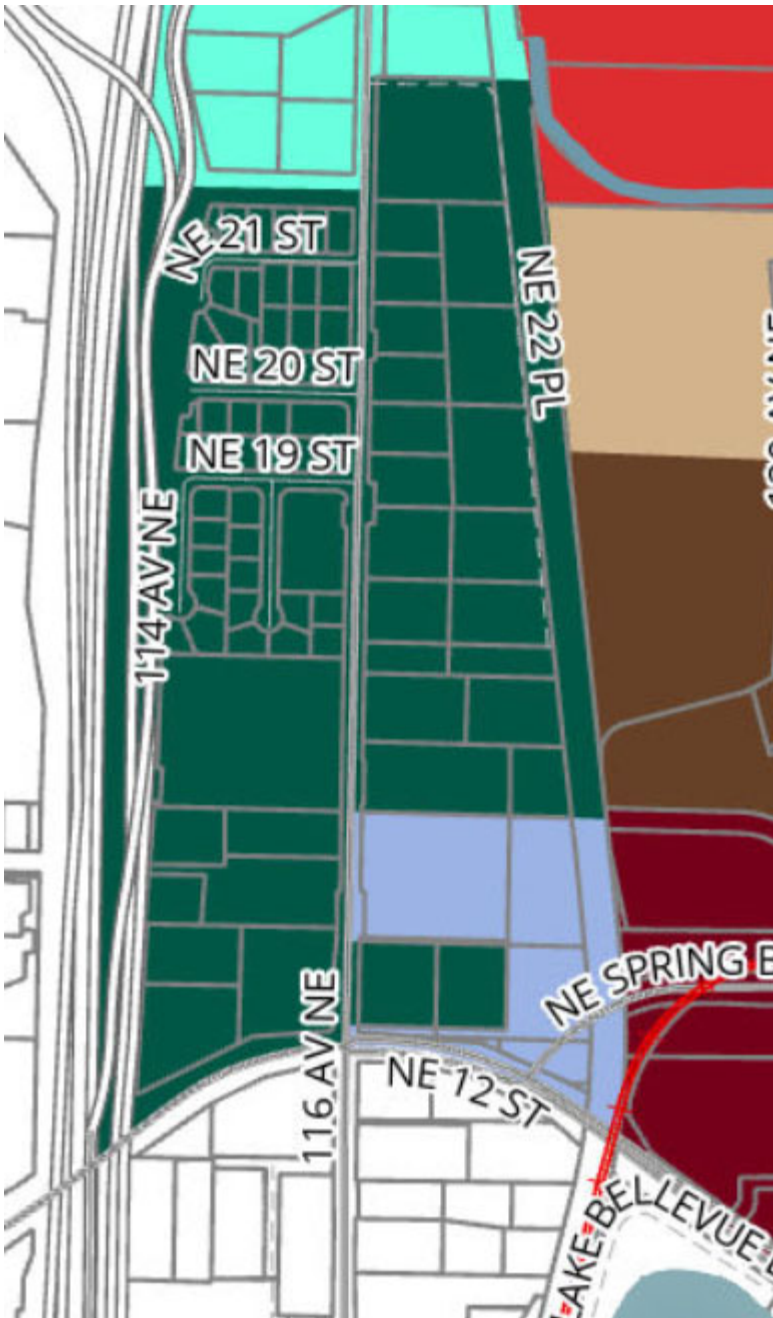
Uses in Mixed-Use Highrise Land Use Districts – Dimensional Requirements

Development Type (1)(2)	UC		MU-H		MUR-H		MUO-H		MUM-H	
	Nonres.	Res.	Nonres.	Res.	Nonres.	Res.	Nonres.	Res.	Nonres.	Res.
Maximum Height (3)	450'	450'	250'	250'	250'	250'	250'	250'	250'	250'
Base FAR	6.0	8.0	4.0	6.0	4.0	6.0	6.0	4.0	6.0	2.0 / 4.0 (6)
Maximum FAR	10.0	Unlimited	8.0	Unlimited	8.0	Unlimited	8.0	8.0	8.0	8.0

Attachment A

(5) Where a building exceeds 100 feet in height, the maximum floor plate restriction shall apply beginning with the first full floor plate located above 55 feet in height and then to all floor plates going up to the applicable maximum building height.

(6) Base FAR for residential development in the MUM-H land use district on the west side of 116th Avenue NE is 2.0. Base FAR for residential development in the MUM-H land use district on the east side of 116th Avenue NE is 4.0.



Kevin R. Wallace
330 112th Ave. NE #200
Bellevue, WA 98004
(425) 802-5701 (Cell)

BelRed LUCA — AIS Amenity Requirements by Land Use District

50,000 SF lot · 4.5 FAR target · 225,000 GSF building · LUC 20.25D.050.C · May 18, 2026 Strike Draft

PROJECT PARAMETERS

	West MUM-H (116th Ave NE — west side)	East MUM-H (116th Ave NE — east side)	MUR-H
Residential Base FAR	2.0	4.0	6.0
Target FAR	4.5	4.5	4.5
FAR Above Base (Residential)	2.5	0.5	—
Lot Size	50,000 SF	50,000 SF	50,000 SF
Building GFA	225,000 GSF	225,000 GSF	225,000 GSF
Total AIS Points Required	125,000	25,000	0

AIS AMENITY REQUIREMENTS — required quantity if all points sourced from a single option

AIS Option	Point Rate (116th NE Corridor)	West MUM-H 125,000 pts required	East MUM-H 25,000 pts required	MUR-H 0 pts required
Public Art ¹	73.37 pts / \$1,000	\$1,704,000	\$341,000	None required
Outdoor Plaza ¹	8.8 pts / SF	14,205 SF	2,841 SF	None required
Green Building — LEED Silver ¹	0.33 pts / GSF	Not achievable ² max 74,250 pts (59% of req.)	Entire building yields 74,250 pts	None required
Green Building — LEED Gold ¹	0.44 pts / GSF	Not achievable ² max 99,000 pts (79% of req.)	Entire building yields 99,000 pts	None required
Affordable Housing @ 80% AMI	4 pts / GSF	31,250 GSF	6,250 GSF	None required
Affordable Housing @ 60% AMI	6 pts / GSF	20,833 GSF	4,167 GSF	None required
Affordable Housing @ 40% AMI	8 pts / GSF	15,625 GSF	3,125 GSF	None required
Park Dedication	45 pts / \$1,000 FMV	\$2,778,000 FMV	\$556,000 FMV	None required
Trail Dedication ³	3 pts / SF	41,667 SF	8,333 SF	None required
Stream Restoration	66.7 pts / \$1,000 cost	\$1,875,000	\$375,000	None required
Natural Drainage ³	0.7 pts / SF	178,571 SF	35,714 SF	None required
TDR	Rate TBD	TBD	TBD	None required

NOTES

¹ 116th NE Corridor +10%	Applies to Public Art, Outdoor Plaza, and Green Building only (LUC 20.25D.050.C). Base rates before bonus: Public Art 66.7 pts/\$1,000 · Outdoor Plaza 8.0 pts/SF · Green Building Silver 0.30 pts/GSF · Gold 0.40 pts/GSF. All other options reflect unadjusted base rates. MUR-H column uses unadjusted base rates (MUR-H parcels are not in the 116th NE Corridor district).
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² Green Building ceiling	Green building points require whole-building certification — partial certification is not available. The 225,000 GSF building generates a hard ceiling of 74,250 pts (Silver) or 99,000 pts (Gold). Neither level clears the 125,000-pt west-side MUM-H requirement. Green building cannot serve as a standalone path on the west side at any certification level under current rates.
³ Practical constraints	Natural drainage and trail dedication are included for completeness but are not viable standalone paths. Natural drainage west (178,571 SF) is 3.6× the lot size; east (35,714 SF) is 71% of the lot. Trail dedication west (41,667 SF) presupposes an adjacent off-site trail corridor not present at this site.
Source	LUC 20.25D.050.C (BelRed AIS schedule and 116th NE Corridor bonus) · LUC 20.20.010 Chart (MUM-H dimensional standards; Footnote 6: 2.0/4.0 residential base FAR west/east of 116th Ave NE) · MUR-H base residential FAR = 6.0 per Chart 20.20.010 · May 18, 2026 Strike Draft.

Nesse, Katherine

From: Diana Leo <diana@bellevuechamber.org>
Sent: Monday, June 1, 2026 6:09 PM
To: Khanloo, Negin; Lu, Jonny; Kennedy, Mariah; Villaveces, Andres; Ferris,Carolynn; Goepppele, Craighton; Nilchian, Arshia; PlanningCommission; Whipple, Nicholas; Gallant, Kristina
Subject: BelRed LUCA Follow-Up Response to May 27th Meeting

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

Dear Chair Khanloo, Commissioners, and Staff:

Thank you for your time and valuable feedback during the meeting on Wednesday, May 27th. As a follow up to the BelRed Look Forward LUCA study session, I am providing [our response](#) to the questions and comments raised during the meeting.

We look forward to continuing this collaborative work to build a strong, accessible, and economically vibrant transit-oriented district. Please let me know if you have any questions or require additional information.

Respectfully,
Diana

Diana Leo | Vice President of Government Affairs
Bellevue Chamber of Commerce
M: 435.760.0559 E: diana@bellevuechamber.org
330 112th Ave. NE, Suite 100, Bellevue, WA 98004





PLUSH COMMITTEE

Permitting, Land Use, Sustainability, & Housing

bellevuechamber.org

425-454-2464

staff@bellevuechamber.org



June 1, 2026

Bellevue Planning Commission
City of Bellevue
450 110th Ave NE
Bellevue, WA 98004

Re: BelRed Look Forward LUCA — Local Street Network

Dear Chair Khanloo and Members of the Commission:

On behalf of the Bellevue Chamber's PLUSH Committee, thank you for the careful and substantive discussion of the BelRed Look Forward LUCA street network at your May 27 study session. The Chamber appreciates the depth of work the Commission and City staff have put into the revised draft, and we want to be helpful in moving this important code update toward a workable outcome.

We are writing to do three things: (1) acknowledge how the TENW preliminary traffic assessment was recirculated to the Commission ahead of the meeting; (2) explain why the report's central finding remains relevant to the question before the Commission; and (3) offer constructive responses on several of the issues commissioners raised.

On the circulation of the TENW assessment

The Chamber recirculated the June 2025 TENW preliminary traffic assessment to the Commission the evening before the May 27 study session. We did so at Commissioner Kennedy's request. In hindsight, we should have packaged that transmittal with more context — when the report was prepared, that it had previously been shared with City staff, and how staff had already used it to inform two subsequent revisions of the draft code. We did not, and we apologize for any confusion the late timing and missing context caused for the Commission and for staff.

We were pleased to hear on the record that staff considered the report informative when it was originally submitted in 2025 and that it played a role in shaping the revisions reflected in the May 18 draft. The reduced number of defined segments, the new flexibility to shift intersections during project review, and the proposed off-ramp pathway are all meaningful improvements. The Chamber recognizes that progress and thanks staff for the work.

Why the report still matters

Even with those revisions, the report's core empirical finding stands, and staff agreed with it directly during the May 27 discussion: the local street grid is not required to meet system-wide transportation capacity in BelRed.

That agreement clarifies the question now before the Commission. Under Washington law, when a city requires a property owner to dedicate land and construct public infrastructure as a condition of redevelopment, the dedication must be reasonably necessary as a direct result of that specific development's impact, and the burden is on the city to demonstrate that there is an impact. Required public streets are, in essence, an exaction meant to mitigate a transportation demand that the development itself creates. With the transportation-capacity rationale set aside by staff's own analysis, the policy and legal basis for requiring mandatory public Green Streets parcel by parcel becomes harder to support — particularly where the residual mapped grid still crosses existing buildings, runs through critical areas, traverses significant grade changes, or requires the coordinated participation of multiple separately-owned properties on different development timelines.

We agree with the point staff raised that the TENW report focused on arterial capacity and did not control for floor-area ratio, building height, amenities, or critical-areas requirements as alternative explanations for past development activity in BelRed. That is fair, and the Chamber is engaging on each of those questions separately through the broader LUCA comment process. The grid is not the only constraint on redevelopment, but it is a meaningful one.

Neither did the TENW report discuss regulations on internal driveways that a property owner chooses to provide. An internal driveway stands in contrast to a mandatory taking of private property for public use. We do not dispute that the City has the ability to impose reasonable regulations on interior driveways, or even to require internal driveways as was done in the Wilburton LUCA. But that is not the same as forcing a dedication of private property for a public road as a condition to development. To do so, the City must either demonstrate that the dedication is necessary because of the impacts of the project, or condemn the property and build the road. Here, it appears that all parties agree that the land use code will not trigger an impact that justifies a taking of private property for a public street, so it is not legal to mandate it in the code.

Even without the backdrop of these legal concerns, we know all participants in the process are in strong agreement that the fast redevelopment of this area is vital to achieving the neighborhood's housing goals and transit and pedestrian focused identity. Any required public street grid runs counter to these goals.

Responses to several of the issues raised at the meeting

The administrative off-ramp. The new pathway to substitute private access corridors for defined public local streets is a real step forward, and the Chamber appreciates staff's creativity. Our remaining concern is the one Commissioners Kennedy and Villaveces both raised: as drafted, the off-ramp is a discretionary review process whose criteria are still being defined. Property owners and the development community need clearly codified, performance-based criteria they can read on the face of the code and underwrite at the front end of a transaction. This is especially important at the megablock scale, where parcels will develop on different timelines and uncoordinated discretionary outcomes can leave each developer guessing how their proposal will line up with the next. We request that the private access corridor provisions become non-discretionary and substitute for the street dedication requirements.

It's also important to recognize that the current BelRed code already includes an administrative off-ramp for the local street grid. However, the off-ramp has been sparingly used, and the process lacks the certainty needed for due diligence on a site. As several commentators mentioned at the May 27 meeting, if

there are segments of the proposed network that seem like candidates for an off-ramp now, then the code should just remove these segments from the map and rely on the block perimeter limits.

The typology gap. The Chamber shares the concern Commissioner Goepple raised about the limited menu of available street typologies. The current draft does not include a public typology for a low-vehicular or non-vehicular shared corridor, a Woonerf-style street, an enhanced shared-use corridor with public ownership and easement-based maintenance, or similar. That gap matters because it forces the Commission into a binary choice between full public Green Streets and private alternatives, when the underlying connectivity, access, and public-realm goals could be served more flexibly by a third option that does not yet exist in the City's code.

We understand from staff that developing a new typology is a transportation-department capacity question and that immediate action is constrained. We respectfully suggest that the LUCA include direction to develop one or more such typologies on a defined timeline, and that, until those typologies exist, the code default to allowing private alternatives (with public access easements and recorded maintenance covenants) where the City's underlying public-realm interests can be secured through those instruments.

Local access and circulation. The Chamber agrees with staff that local access, circulation, utility access, emergency access, loading and refuse access, and pedestrian and bicycle connectivity are real and important objectives. We do not believe public fee-simple right-of-way dedication is the only or best way to achieve them. Utility access is routinely secured through easements citywide. Emergency access is addressed through Fire Code review at the permit stage. Loading and refuse can be accommodated by private alleys at modest cross-sections. Pedestrian and bicycle connectivity can be served by through-block paths of the kind already used successfully in the Downtown LUC. Each of these can be and are already required of every BelRed project without requiring the City to take fee-simple title to the corridor itself.

Long-term private-street maintenance. Staff's concern that private streets carry long-term enforcement risk as properties change hands is legitimate, although private driveways have been commonplace in Downtown for decades, as properties changed hands, and we are not aware of any maintenance concerns. The Chamber would suggest two alternatives in lieu of a property taking. First, the LUCA can require any private corridor that substitutes for a mapped public street to be subject to a recorded maintenance covenant binding successor owners. Second, the long-term theoretical risk of maintenance failure has to be weighed against the empirical record of the last fifteen years, in which the prescriptive grid framework has produced limited development overall. The risk of "no project" is at least as material to the City's goals as the risk of "imperfect long-term maintenance."

The Wilburton comparison and active-use frontage. The Chamber supports Commissioner Ferris's observation that a 75% active-use frontage requirement is high and would prove difficult to lease, particularly in earlier-stage neighborhoods. A 50% target with built-in flexibility for non-residential corridors would be a more workable threshold. We would also note that Wilburton, a higher-density TOD subarea with the same transit-oriented planning framework, does not impose a mandatory street grid and has drawn significant redevelopment interest in part due to that fact. There is no policy reason BelRed should be held to a more burdensome standard.

East-west bicycle and pedestrian connectivity. Vice Chair Lu's observation that BelRed's east-west connections are dangerous for cyclists today and that the corridors should prioritize pedestrian and bicycle use is well-taken. The Chamber supports designing most corridors constructed by developers in BelRed around active transportation, and this is precisely the use case where a low-vehicular or shared-use public typology, were one available, would best serve the City's goals.

Written responses to public comment. The Chamber supports Commissioner Villaveces's request that staff provide responses to public comments before the next session. We would be glad to assist in that work in any way.

The Chamber's interest is aligned with the City's and the Commission's: a BelRed that delivers on the Subarea Plan's vision of housing, jobs, walk and bikeability, and arts-district vitality. We hope to continue our conversations with commissioners as the draft moves toward the public hearing, and we will gladly make ourselves available for conversations with staff or members of the commission at any time. The Chamber's BelRed working group is at your and staff's disposal.

We also want to reiterate our apology for any confusion the recirculation of the TENW report may have caused on the eve of the meeting. The questions commissioners raised throughout the May 27 discussion were thoughtful and well-framed, and staff's responses were equally substantive. The Chamber is grateful for the seriousness with which both the Commission and staff are engaging on these complex issues, and we look forward to continuing to be a constructive partner in shaping a workable final code.

Sincerely,



Joe Fair
President & CEO
Bellevue Chamber of Commerce
on behalf of the PLUSH Committee

Nesse, Katherine

From: NORMAN HANSEN <hansennp@aol.com>
Sent: Tuesday, June 2, 2026 4:02 PM
To: Council; PlanningCommission; evansplazacpa@googlegroups.com;
board@bridletrailscommunity.org; warren@aol.com
Subject: Evans Plaza CPA Application 25-121477-AC From General Commercial to Low Rise Mixed Use up to 8 Stories
Attachments: Evans Plaza CPA.docx
Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.

June 2, 2026

Evans Plaza CPA Application 25-1211477-AC From General Commercial to Lowrise Mixed Use up to a Potential of 8 Stories

To: Bellevue City Council, and the Bellevue Planning Commission

Evans Plaza has served the Bridle Trails Neighborhood well over the last 50 years. It is a mix of thriving essential neighborhood businesses with :

Grocery , Gas station, Popular restaurants, Daycare, Dry cleaner, Hair salon, Car sales and repair, Furniture consignment store, ice cream parlor, Coffee stand, Car rental others.

It is important for Bellevue Neighborhoods to keep their unique shopping areas. Otherwise Bellevue will be homogenized ending up with one size fits all.

The developer already has substantial residential upzoning in Bel-Red a few steps from the 130th Ave NE Sound Transit Station. Also, they shared at a recent meeting with Bridle Trails and Rock Creek residents, that their bid was accepted to build mixed use in Redmond near sound transit just east of the Super Safeway on NE 24 and 156 Ave NE. Certainly no lack of existing residential capacity.

It is requested that the council consider substantial Community Engagement during the upcoming Bridle Trails Sub Area Update. This seems to be more reasonable than the current "Top Down" approach.

As you are aware, Bridle Trails is a diverse Neighborhood with 2000 single family homes with various densities and 3000 multifamily units mostly 2 and 3 story with a few 4 story. Also, Bridle Trails is number 2 in Bellevue with affordable units.

We will appreciate Council support to maintain our heritage and character by allowing us to have extensive community engagement in our upcoming Bridle Trails Subarea update.

Norm Hansen Bridle Trails Community Club Board Focal, 3851 136th Ave NE
Bellevue 425 861 7333

r



Bellevue Planning Commission

June 10, 2026

PLANNING COMMISSION AGENDA ITEM

SUBJECT

Final Review of Transportation Element Conformance Comprehensive Plan Amendment (CPA)

STAFF CONTACTS

Thara Johnson, Planning Director, 452-4087

Kate Nesse, PhD, Comprehensive Planning Manager, 452-2042

Teun Deuling, AICP, Senior Planner, 229-6534

Community Development Department

Kevin McDonald, AICP, Principal Transportation Planner, 452-4558

Transportation Department

POLICY ISSUES

The proposed city-initiated amendment seeks to incorporate limited amendments to the Transportation Element to ensure conformance between the Comprehensive Plan and specific functional plans (Mobility Implementation Plan and Transportation Facilities Plan), reflecting recent updates to those plans.

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION



DIRECTION



INFORMATION ONLY



1. Review the Transportation Commission's recommendation to amend the Comprehensive Plan's Transportation Element to achieve consistency with the recently adopted Mobility Implementation Plan (MIP) and Transportation Facilities Plan (TFP).
2. Direct staff to hold a public hearing for the Final Review.

Staff requests the Planning Commission to direct staff to set a public hearing date for the Transportation Conformance CPA.

BACKGROUND

The Comprehensive Plan may be amended no more frequently than once every year under the state Growth Management Act (GMA). Amendments to the Comprehensive Plan may be initiated by the city or by private individuals. Pursuant to the GMA, the Bellevue City Code at Part 20.30I LUC permits the City Council to initiate CPAs at any time and provides a one-step process for review (Final Review) by the

Planning Commission and consideration for approval by Council. See **Attachment A** for the complete text of the Final Review Decision Criteria as set forth in LUC 20.301.150.

Once initiated, Council sends the proposed CPA to the Planning Commission for review and recommendation. Council considers the recommendation of the Planning Commission and takes action to adopt (or not adopt) the proposed amendment to the Comprehensive Plan.

The City Council initiated the CPA on March 10 to incorporate amendments to the Transportation Element, as part of the 2026 work program.

Transportation Element Conformance CPA

The proposed city-initiated amendment seeks to incorporate limited amendments to the Transportation Element to ensure conformance between the Comprehensive Plan and specific functional plans, reflecting recent updates to those plans.

On November 25, 2025, the City Council adopted both the Mobility Implementation Plan (MIP) 2025 Update, incorporating and also superseding the 2009 Pedestrian and Bicycle Transportation Plan, and the 2026-2045 Transportation Facilities Plan (TFP). As noted in the agenda materials for that meeting, the Transportation Department would initiate and recommend a conformance amendment to the Comprehensive Plan in 2026 following the adoption of the 2025 update. As the 2009 Pedestrian and Bicycle Transportation Plan is now fully incorporated into the MIP, which is the document that includes all mobility options (including walking and bicycling) within the city, the proposed conformance amendments seek to amend policy TR-96 and to delete non-policy narrative references to the 2009 Pedestrian and Bicycle Transportation Plan in the Comprehensive Plan. The MIP is already fully incorporated into the Comprehensive Plan.

On November 25, 2025, City Council also adopted the 2026-2045 TFP, extending its timespan from 12 to 20 years. The TFP serves as the city's intermediate-range, transportation capital facility planning document and functions as a bridge between the MIP, long-range facility plans, modal plans, and the 5 funded projects in the Capital Improvement Program (CIP) Plan. The proposed conformance amendments seek to amend non-policy narrative references in the Transportation Element to the prior 12-year TFP timespan.

Transportation Commission Recommendation

The Transportation Commission reviewed the staff recommended policy and narrative amendments to the Transportation Element on March 12. On May 14, the Transportation Commission recommended the proposed amendments and approved a transmittal memo to the Planning Commission. See **Attachment B** for the Transportation Commission's transmittal memo, including a strike-draft of the recommended Transportation Element amendments.

Staff Recommendation

In addition to the Transportation Element amendments recommended by the Transportation Commission, staff recommend removing additional references to the Pedestrian and Bicycle Transportation Plan elsewhere in the Comprehensive Plan (see **Attachment C**).

NEXT STEPS

Staff will incorporate Planning Commission direction into the staff report that will be prepared for the Final Review public hearing (tentatively scheduled for July 22).

ATTACHMENTS

- A. Final Review Decision Criteria (LUC 20.30I.150)
- B. Transportation Commission Transmittal Memo
- C. Strike-draft Complementary Comprehensive Plan Amendments

20.30I.150 Final Review Decision Criteria

The Planning Commission may recommend and the City Council may adopt or adopt with modifications an amendment to the Comprehensive Plan if:

- A. There exists obvious technical error in the pertinent Comprehensive Plan provision; or
- B. The following criteria have been met:
 - 1. The proposed amendment is consistent with the Comprehensive Plan and other goals and policies of the City, the Countywide Planning Policies, the Growth Management Act and other applicable law; and
 - 2. The proposed amendment addresses the interests and changed needs of the entire City as identified in its long-range planning and policy documents; and
 - 3. The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended. See LUC 20.50.046 for the definition of “Significantly Changed Conditions;” and
LUC 20.50.046 Significantly changed conditions. Demonstrating evidence of change such as unanticipated consequences of an adopted policy, or changed conditions on the subject property or its surrounding area, or changes related to the pertinent Plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole. This definition applies only to Part 20.30I Amendment and Review of the Comprehensive Plan (LUC 20.50.046); and
 - 4. If a site-specific proposed amendment, the subject property is suitable for development in general conformance with adjacent land use and the surrounding development pattern, and with zoning standards under the potential zoning classifications; and
 - 5. The proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare of the City.



Bellevue Transportation Commission

Commissioners:

Karen Stash, Chair
Drew Magill, Vice Chair
Susanna Keilman
Nik Rebhuhn
Albert Ting
Anthony Welcher
Kay Williams

City Council Liaison:

Dave Hamilton,
Councilmember

Staff Contact:

Kevin McDonald, AICP
 425-452-4558
 kmcdonald@
 bellevuewa.gov

Date: May 14, 2026
To: Planning Commission
From: Transportation Commission
Subject: Transmittal of Recommended Transportation Element Amendments for the 2026 Annual Comprehensive Plan Amendment

On May 14, 2026, the Transportation Commission approved recommended amendments to the Comprehensive Plan Transportation Element to achieve consistency with the recently adopted Mobility Implementation Plan and the Transportation Facilities Plan and voted to transmit the recommendation to the Planning Commission.

Council initiated the Comprehensive Plan Transportation Element amendments on March 10, 2026, and Transportation Department staff reviewed the recommended amendments with the Transportation Commission on March 12. Amendments to policy TR-96 and to narrative sections are needed to ensure conformance between the Comprehensive Plan and the recently adopted Mobility Implementation Plan and the Transportation Facilities Plan.

Mobility Implementation Plan

On November 25, 2025, the City Council adopted the Mobility Implementation Plan 2025 Update that incorporated and superseded the Pedestrian and Bicycle Transportation Plan. As the Pedestrian and Bicycle Transportation Plan is now fully incorporated into the Mobility Implementation Plan (MIP), our recommendation is to amend policy TR-96 and to delete non-policy narrative references to the Pedestrian and Bicycle Transportation Plan. The MIP is already fully incorporated into the Comprehensive Plan.

Transportation Facilities Plan

On November 25, 2025, City Council adopted the 2026-2045 Transportation Facilities Plan (TFP), an action that extended its timespan from 12 years to 20 years. Our recommendation is to amend non-policy narrative references in the Transportation Element to reflect the now 20-year TFP timespan.

Attachment A is a strike draft of our recommendation.

We appreciate the opportunity to work to achieve conformance between the Comprehensive Plan and the adopted Mobility Implementation Plan and the Transportation Facilities Plan.

Attachment A

Strike-draft of recommended Transportation Element Amendments

Policy TR-96. ~~Implement the Pedestrian and Bicycle Transportation Plan and E~~valuate, describe, and prioritize projects ~~concepts~~ that address Performance Target gaps through the Mobility Implementation Plan.

P. TR-3 Narrative

To ensure that getting around Bellevue on foot is easy and safe, and that bicycling facilities accommodate riders of all ages and abilities, Bellevue implements and maintains a network illustrated and described in the ~~Pedestrian and Bicycle Transportation~~[Mobility Implementation Plan](#). ~~This plan includes policies, design standards and a comprehensive and prioritized project list.~~ The Mobility Implementation Plan defines Performance Targets for each mode that describes the intended user experience and ~~that serves~~ to identify and prioritize needed investments.

P. TR-3 Call Out Box

~~PEDESTRIAN AND BICYCLE TRANSPORTATION~~[MOBILITY IMPLEMENTATION PLAN](#)

The ~~Pedestrian and Bicycle Transportation Plan~~[Mobility Implementation Plan](#) articulates a shared vision for walking and bicycling in Bellevue. The ~~plan~~[Mobility Implementation Plan](#) identifies ~~where the intended performance of the network does not meet the adopted targets so that project concepts can be developed more than 400 projects that, when funded, would~~to make biking and walking in Bellevue safer and easier.

P. TR-7 Call Out Box

Performance Measures. Performance is measured against adopted Performance Targets in the ~~Mobility Implementation Plan, and mode-specific plans, including the Pedestrian and Bicycle Transportation Plan and the Transit Master Plan.~~

Map TR-5. Pedestrian Facilities

This map shows existing sidewalks, multi-purpose paths and trails that comprise the existing pedestrian network in Bellevue. Please refer to the ~~Bellevue Pedestrian and Bicycle Transportation Plan~~[Mobility Implementation Plan](#) for ~~a map of arterial pedestrian network Performance Target gaps and a list of trail~~ projects that would add to existing facilities

Map TR-6. Bicycle Facilities

This map shows existing bicycle lanes, shared shoulders, wide lanes, shared lanes and multi-purpose paths that comprise the existing bike network in Bellevue. Please refer to the ~~Pedestrian and Bicycle Transportation Plan~~[Mobility Implementation Plan](#) for ~~a map of~~

[arterial bicycle network Performance Target gaps and a list of trail](#) projects that would add to existing facilities.

P. TR-4 Call Out Box

TRANSPORTATION FACILITIES PLAN (TFP) Typically updated every two to three years, the TFP is a “financially constrained” plan meaning the identified cost of the projects in the TFP must be balanced with the city’s transportation revenue projections for the [+220](#)-year plan period. Some projects listed in the TFP include funding allocations for initial development or partial implementation only.

Strike-draft of Complementary Comprehensive Plan Amendments

P. IV-5 Call Out Box

There are other plans that impact the implementation of the Comprehensive Plan maintained by other agencies such as King County and the Bellevue School District.

- Affordable Housing Strategy
- Diversity Advantage Plan
- Economic Development Plan
- Environmental Stewardship Plan
- Fire Department Strategic Plan
- Human Services Needs Update
- Mobility Implementation Plan
- Parks and Open Space System Plan
- ~~Pedestrian and Bicycle Transportation Plan~~
- Police Department Strategic Plan
- Recreation Program Plan
- Storm and Surface Water System Plan
- Transit Master Plan
- Transportation Facilities Plan
- Wastewater System Plan
- Water System Plan
- Watershed Management Plan

P. GL-2: Bicycle Route

A route specifically designed and designated for bicycle travel, whether exclusively for bicyclists or to be shared with other transportation modes. Refer to the ~~Pedestrian and Bicycle Transportation Plan~~ Mobility Implementation Plan for the various types of bicycle facilities that may be employed to create a bicycle route.

P. GL-2: Bicycle System Plan Map

A map in the ~~Pedestrian and Bicycle Transportation Plan~~ Mobility Implementation Plan, that depicts the plan for a complete and connected network of bicycle routes serving the entire community that is compatible with and connected to regional and interjurisdictional facilities.

P. GL-10: Pedestrian System Plan Map

In the ~~Pedestrian and Bicycle Transportation Plan~~ Mobility Implementation Plan, a map that depicts a complete and connected network of pedestrian facilities that serve the entire community and are compatible with regional and inter-jurisdictional facilities. ~~Pedestrian facility types are defined and described in the Pedestrian and Bicycle Transportation Plan.~~



Bellevue Planning Commission

June 10, 2026

PLANNING COMMISSION AGENDA ITEM

SUBJECT

Final Review Study Session: 2026 Annual Comprehensive Plan Amendment – Evans Plaza

STAFF CONTACTS

Thara Johnson, Planning Director, 452-4087
Kate Nesse, PhD, Comprehensive Planning Manager, 452-2042
Teun Deuling, AICP, Senior Planner, 229-6534
Community Development Department

POLICY ISSUES

The Comprehensive Plan may be amended no more frequently than once every year under the state Growth Management Act (GMA). Amendments to the Comprehensive Plan may be initiated by the city or by private individuals. The Bellevue Land Use Code, at Part 20.30I LUC and in compliance with the GMA, allows property owners to propose site-specific Comprehensive Plan Amendments (CPAs) and for anyone to propose non-site specific, or citywide, amendments. Privately proposed CPAs are accepted and reviewed annually and include the two tier-process of threshold review and final review, which consists of the following process:

1. Threshold Review
 - a. Planning Commission study, evaluate, hold a public hearing, and recommend whether proposals should be considered for further review in the annual work program;
 - b. City Council takes action on Planning Commission recommendations to include (or not include) the proposal in the annual CPA work program; and
 - c. Proposals included in the annual work program are referred to the Planning Commission for Final Review.
2. Final Review
 - a. Planning Commission study, evaluate, hold a public hearing and recommend whether proposals should be adopted; and
 - b. City Council takes legislative action on the Planning Commission's Final Review Recommendation.

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION



DIRECTION



INFORMATION ONLY



1. Study and review the staff agenda memo.
2. Direct staff to hold a public hearing for the Final Review.

Proposed Plan Amendment	Site-specific Proposal	Applicant
<p style="text-align: center;">Evans Plaza 25 121477 AC 2255 140th Avenue NE <i>Bridle Trails</i></p>	<p>This privately-initiated application proposes a map amendment from General Commercial to Lowrise 2 Mixed Use on an approximately 10-acre site.</p>	<p style="text-align: center;">Steve Malsam</p>

BACKGROUND/ANALYSIS

The Planning Commission reviewed the application during Threshold Review per the decision criteria for Threshold Review of a privately-initiated Comprehensive Plan Amendment at LUC 20.30I.140.

After reviewing the geographic scope of the application at the meeting on January 14, 2026, the Planning Commission directed staff to include an additional parcel – the corner parcel on the block (parcel number 272505-9167) – in the proposed amendment. Following the Threshold Review public hearing on February 11, 2026, the Planning Commission found that the proposed amendment is consistent with all the Threshold Review decision criteria and made a recommendation to the City Council that the Evans Plaza proposal be included in the 2026 annual Comprehensive Plan Amendment work program.

On March 10, City Council voted unanimously to include the Evans Plaza proposal in the 2026 work program and, therefore, moving it to Final Review.

The second process step, Final Review, addresses specific merit-based issues and evaluates a proposed amendment using decision criteria set forth in LUC 20.30I.150 (see **Attachment A**) to determine if the proposal should be adopted into the Comprehensive Plan. The Planning Commission holds a Final Review public hearing and makes a recommendation. The City Council’s subsequent legislative action on the recommendation amends (or does not amend) the Comprehensive Plan.

Proposal

The proposed Evans Plaza CPA entails a requested change in land use designation from General Commercial to Lowrise 2 Mixed Use on an approximately 10-acre site.

The following summary is based on the information provided in the application (permit 25-121477 AC): The proposed amendment site consists of five parcels under common ownership and located near transit, specifically bus service near BelRed Road and light rail service at the BelRed and Overlake Village stations. The stated intent of the site’s future redevelopment is to replace the aging commercial center with mixed-use residential development. The leases are expiring on the property and the buildings will soon become vacant.

The site is located within the PineView Neighborhood Center as identified in the Bellevue Comprehensive Plan. The applicant believes mixed-use residential redevelopment of the site would be aligned with the Comprehensive Plan policies and goals related to Neighborhood Centers. The combination of multifamily housing and commercial spaces would provide goods and services to local residents and serve as important focal points and gathering spaces for the community.

Site Analysis

The site, Evans Plaza, is located north of SR-520, east of 136th Place NE, south of NE 24th Street, and west of 140th Avenue NE (see **Attachment B**). The parcel numbers for the relevant properties here are 272505-9074, 272505-9179, 272505-9180, 272505-9181, and 272505-9233. As noted, Commission previously directed staff to expand the geographic scope of the proposed amendment to include the corner parcel on the block (parcel number 272505-9167). Evans Plaza is currently occupied by several single-story commercial buildings. The tenants are a range of large and small commercial services (including daycare), retail (including a wholesale grocery and vehicle dealerships) and restaurants.

The site is located in the Bridle Trails neighborhood area, for which the Bridle Trails Subarea Plan is in effect. The Bridle Trails Subarea Plan divides the subarea into two planning districts: Planning District A and Planning District B. The site is located in Planning District A.

The proposed amendment site is in the PineView Neighborhood Center, one of thirteen Neighborhood Centers in Bellevue as identified on Map LU-2 in the Comprehensive Plan. Neighborhood Centers are commercial or mixed-use areas in locations that are otherwise primarily residential. They are envisioned to serve some of the daily needs of people living in the area. Neighborhood Centers range from commercial centers anchored by a grocery store, library or other major community asset to collections of a few small businesses. Larger centers may serve the needs of a wider community. PineView is a Neighborhood Center that has a more office-focused character with limited community gathering spaces and retail uses predominantly located on the proposed amendment site.

Transit access at the site is limited. The light rail stations at BelRed and Overlake Village are located a mile's distance from the site. Overlake Village light rail station also has Metro bus lines 222, 223 and 225. The nearest bus stop is on BelRed Road at the intersection with 140th Avenue NE at a one-half mile walking distance from the site. This bus stop is served by the 226 Metro bus line running between the Bellevue Transit Center and South Bellevue Station, making stops in the Overlake (Redmond) and Lake Hills neighborhoods as well as at Bellevue College. 226 Metro buses generally run every 30 minutes during the workday, with more frequent service at rush hour (approximately between 7 and 9am, and between 3 and 7pm) and once every hour in the evening starting at 7pm.

Neighborhood Centers and Mixed-use Residential Development

As part of the Comprehensive Plan, the Future Land Use Map shows the vision for future development in Bellevue. The existing General Commercial Future Land Use Map designation (see **Attachment C**) for the proposed amendment site does not encompass residential uses, and residential uses are generally not permitted within the associated General Commercial land use district. This privately-initiated application proposes a Comprehensive Plan map change that would allow residential uses to be part of future development of the site.

The 2024 adoption of the 2044 Bellevue Comprehensive Plan established a growth strategy for Bellevue and related goals and policies that support the health and vitality of residential areas by planning for Neighborhood Centers, as identified by Bellevue. Specifically, as stated in the Plan's Land Use element, "Bellevue supports continued engagement and investment to maintain the health of these important centers and allows Neighborhood Centers to become mixed use with some higher density residential alongside the commercial uses", which is also captured in Comprehensive Plan policies focused on the city's land use strategy (LU-1) and Neighborhood Centers (LU-18).

Staff Recommendation

As there are a stated need and established policy for accommodating Bellevue’s housing and job growth within areas designated for compact, mixed-use development such as Neighborhood Centers, allowing mixed-use residential development is generally considered consistent with the Comprehensive Plan.

Staff recommend considering an alternative Lowrise 1 Mixed Use land use designation for the proposed map change, based on a review of the land use designations of Neighborhood Centers elsewhere in Bellevue, PineView’s characteristics as a Neighborhood Center focused on office uses, and the site’s limited transit access.

During the 2024-2044 Comprehensive Plan Periodic Update, land use map changes were studied and implemented to allow for a mix of residential and commercial uses and low-rise buildings in most Neighborhood Centers. Only three of the identified Neighborhood Centers – Kelsey Creek Shopping Center, Lake Hills Village, and Lakemont Village – have the Lowrise 2 Mixed Use designation, which allows for greater residential densities. Other Neighborhood Centers – such as Newport Hills Shopping Center, Northtowne Shopping Center, and BellEast Shopping Center – are more commonly mapped with Lowrise 1 Mixed Use, another mixed-use land use designation allowing for a similar mixes use of uses but at a lower scale and density than Lowrise 2 Mixed Use.

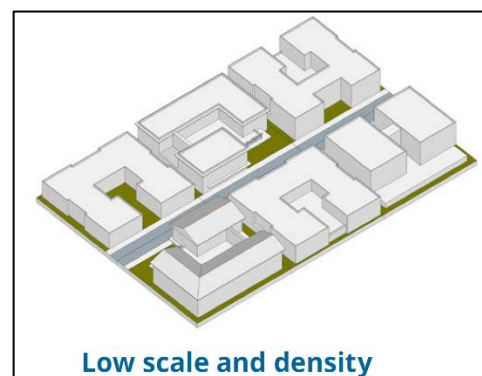
Furthermore, PineView is an office-focused Neighborhood Center with limited retail options, community gathering spaces and transit access to support higher residential densities. Access to nearby frequent, reliable transit service can be a rationale for allowing higher densities. Considering the site’s limited transit access, future development could not be considered transit-oriented development as the site is not within a one-half mile walking distance from Bellevue’s frequent transit network.

Options for Planning Commission Consideration:

1. Staff Recommendation: Lowrise 1 Mixed Use land use designation (**Option 1**)
2. Applicant’s Request: Lowrise 2 Mixed Use land use designation (**Option 2**)

The Comprehensive Plan defines these land use designations as follows:

- Lowrise 1 Mixed Use: The purpose is to provide an area for a mix of housing, retail, service, office and complementary uses at the lower end of a low scale and density.
- Lowrise 2 Mixed Use: The purpose is to provide an area for a mix of housing, retail, service, office and complementary uses at the higher end of a low scale and density.



One or more land use (zoning) districts are associated with each land use designation in the Comprehensive Plan. Neighborhood Business (NB) and Community Business (CB) land use districts are associated with the Lowrise 1 Mixed Use land use designation. The Mixed-Use: 8 Story (MU8) land use district is associated with the Lowrise 2 Mixed Use land use designation. The recently adopted Housing Opportunities in Mixed-Use

Areas (HOMA) Land Use Code Amendment (LUCA) created the Mixed-Use: 8 Story land use district and amended the Community Business land use district.

Business Displacement

During Threshold Review, the Planning Commission and community members raised concerns about potential business displacement that would result from the future development of the proposed amendment site.

Business retention is a priority identified in City Council’s 2024-2026 Vision and Priorities, the Comprehensive Plan, and the recently adopted 2026 Economic Development Plan. In implementing these policies, the City’s Cultural and Economic Development (CED) division manages a range of programs, initiatives and strategies aimed at retaining businesses.

Direct business engagement is an important part of these efforts, such as monitoring the Bellevue development pipeline to identify businesses at risk of displacement. At various stages when projects receive permit approvals staff will visit the property with the goal of supporting each business’s transition to a new location. Additionally, Bellevue’s Small Business Development Center helps businesses, also those facing displacement or looking to relocate, including by accessing loans and other financing.

The recently adopted HOMA LUCA also reflects Council direction to minimize business displacement. The land use districts relevant to both the staff recommended Lowrise 1 Mixed Use (**Option 1**) land use designation and the applicant proposed Lowrise 2 Mixed Use (**Option 2**) land use designation are covered by HOMA. Within the mixed-use areas covered by HOMA – except for parts of Factoria, Eastgate and Downtown – a land use incentive is available to encourage the location or retention on-site of grocery stores, childcare, non-profits, and affordable commercial space.

NEXT STEPS

After the Planning Commission provides direction regarding policy discussion items covered at tonight’s study session, staff will develop a Final Review recommendation. This recommendation is part of the staff report that will be published and made available ahead of the public hearing (tentatively scheduled for July 22). The staff report will also address the environmental impact analysis for this proposal, as required by the State Environmental Policy Act (SEPA).

At the Final Review public hearing, the Commission will be asked to review the staff recommendation, hold the public hearing, and make a recommendation to the City Council on the proposed amendment, using the Final Review decision criteria set forth in LUC 20.30I.150.

ATTACHMENTS

- A. Final Review Decision Criteria (LUC 20.30I.150)
- B. Location Map of Evans Plaza
- C. Future Land Use Map of Evans Plaza

20.30I.150 Final Review Decision Criteria

The Planning Commission may recommend and the City Council may adopt or adopt with modifications an amendment to the Comprehensive Plan if:

A. There exists obvious technical error in the pertinent Comprehensive Plan provision; or

B. The following criteria have been met:

1. The proposed amendment is consistent with the Comprehensive Plan and other goals and policies of the City, the Countywide Planning Policies, the Growth Management Act and other applicable law; and
2. The proposed amendment addresses the interests and changed needs of the entire City as identified in its long-range planning and policy documents; and
3. The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended. See LUC 20.50.046 for the definition of “Significantly Changed Conditions;” and

LUC 20.50.046 Significantly changed conditions. Demonstrating evidence of change such as unanticipated consequences of an adopted policy, or changed conditions on the subject property or its surrounding area, or changes related to the pertinent Plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole. This definition applies only to Part 20.30I Amendment and Review of the Comprehensive Plan (LUC 20.50.046); and

4. If a site-specific proposed amendment, the subject property is suitable for development in general conformance with adjacent land use and the surrounding development pattern, and with zoning standards under the potential zoning classifications; and
5. The proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare of the City.

Evans Plaza

Privately-Initiated Comprehensive Plan Amendment

Attachment B



Legend

- Project Location
- Geographic Scope Expansion
- Parcel
- City Park



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Feet

Source: City of Bellevue

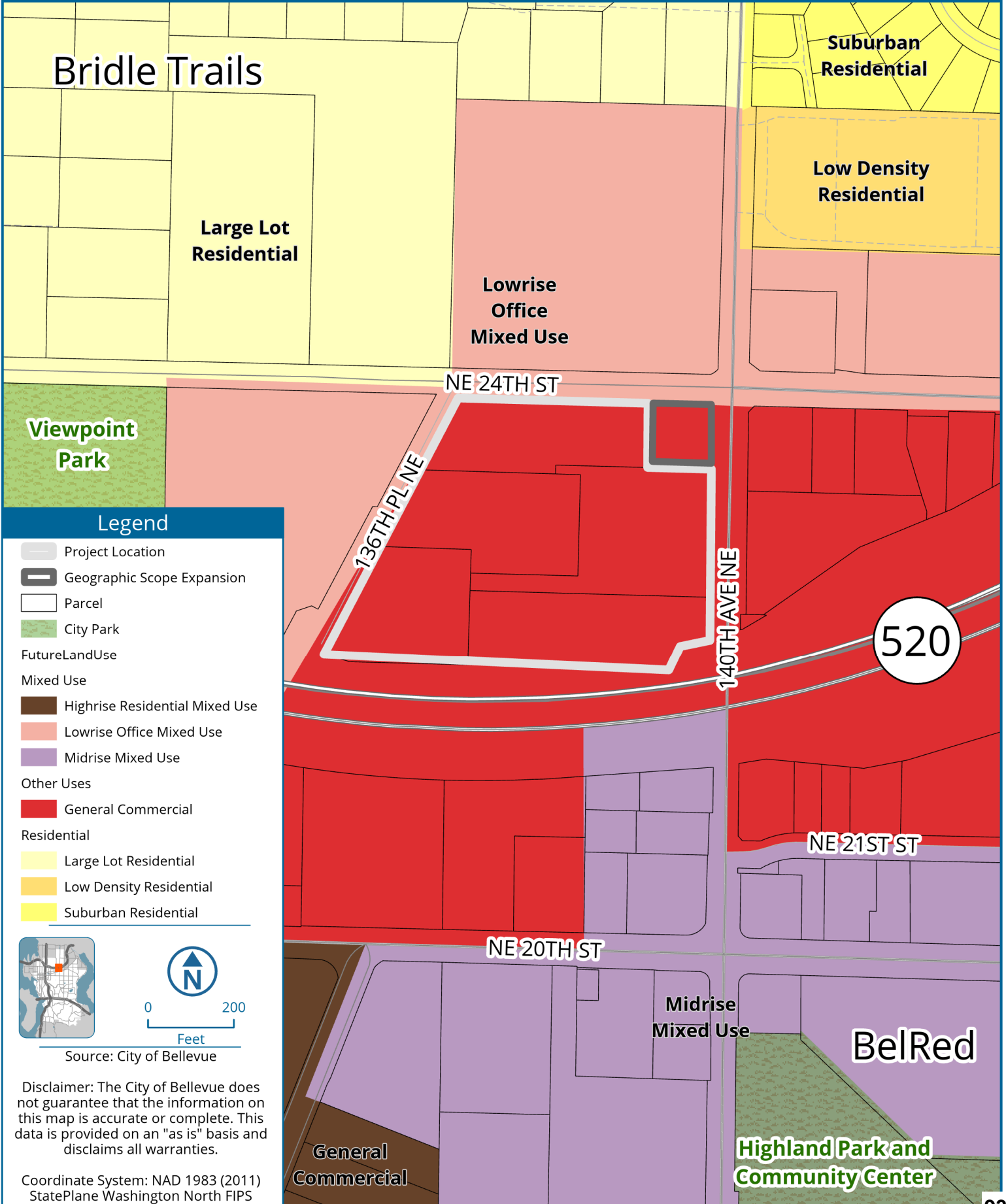
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Coordinate System: NAD 1983
(2011) StatePlane Washington
North FIPS 4601 Ft US

Future Land Use Map of Evans Plaza

Privately-Initiated Comprehensive Plan Amendment

Attachment C



Legend

- Project Location
- Geographic Scope Expansion
- Parcel
- City Park
- FutureLandUse
- Mixed Use
 - Highrise Residential Mixed Use
 - Lowrise Office Mixed Use
 - Midrise Mixed Use
- Other Uses
 - General Commercial
- Residential
 - Large Lot Residential
 - Low Density Residential
 - Suburban Residential



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Feet

Source: City of Bellevue

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Coordinate System: NAD 1983 (2011)
StatePlane Washington North FIPS



Bellevue Planning Commission

June 10, 2026

PLANNING COMMISSION STUDY SESSION ITEM

SUBJECT

Check-in on the High Density Residential and Planned Unit Development Land Use Code Amendment (LUCA).

STAFF CONTACT(S)

Shawn Edghill, Senior Planner, 229-6655

Kristina Gallant, Planning Manager 452-6196
Development Services Department

POLICY ISSUES

This Land Use Code Amendment (LUCA) and Rezone will implement updates to the Future Land Use Map in the Bellevue 2044 Comprehensive Plan to align with new land use designations. The LUCA will implement standards for the High Density Residential Land Use District, which will apply in designated areas within Crossroads and Factoria. It will also update planned unit development (PUD) provisions to allow greater flexibility on large sites and on sites redeveloped with affordable housing.

The proposal directly advances several key policy directives aimed at addressing housing capacity, variety, and site-responsive design:

- **Policy HO-24:** Encourages regulatory approaches that maximize housing variety and achievable density.
- **Policy LU-41:** Directs the City to provide opportunities for increased density and height on larger sites to support clustering, efficient site planning, and the preservation of trees and open space.
- **Affordable Housing Strategy (Action AH.4.3):** Calls for amendments to the PUD code to allow greater flexibility to facilitate affordable housing development.

On May 12, 2026, the City Council initiated work on this LUCA and directed the Planning Commission to review and process the proposal.

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION

DIRECTION

INFORMATION ONLY

The goal of this study session is to provide the Planning Commission with an initial briefing on the scope, approach, and public engagement framework for the HDR-PUD LUCA. Staff requests feedback from the Commission on the proposed code mechanics and the engagement strategy.

BACKGROUND/ANALYSIS

Proposed Scope of Code Amendments

The project scope implements three components of the 2024 Comprehensive Plan related to addressing housing capacity, variety, and site-responsive design:

- High Density Residential Land Use District Implementation and Rezone
- Planned Unit Development (PUD) Code Update
- Overlake Farms Rezone

The legislative history of each item and its scope components is summarized below.

High-Density Residential Land Use District Implementation and Rezone

The Need for a New Zone

The 2024 Comprehensive Plan Update introduced a High-Density Residential land use designation allowing density up to 60 dwelling units per acre. Because the current Land Use Code lacks a standalone zone to accommodate this level of residential intensity outside of mixed-use areas, establishing a new land use category with associated dimensional standards is necessary. The Future Land Use Map with areas designated as High Density Residential (HDR) is provided as Attachment A.

Location and Implementation

This new HDR district will build on the existing medium-density framework, which allows up to 30 dwelling units per acre. The HDR district will apply to designated areas within the Crossroads and Factoria neighborhoods, expanding housing capacity and providing a predictable pathway for high-density residential development.

Dimensional Standards

The LUCA will implement dimensional standards for the HDR district, including maximum building height, setbacks, and maximum Floor Area Ratio (FAR) capable of supporting development density of approximately 60 units per acre. The LUCA will also consider transition standards and compatibility with adjacent lower-density areas.

The LUCA will include a rezone of designated properties to High Density Residential.

Planned Unit Development (PUD) Code Update

What is a PUD?

In Washington State, PUDs are an established land use mechanism that can enable more flexible and efficient site planning than conventional zoning. They allow for clustering of development, modification of dimensional standards, and coordinated design across a site, which can result in better environmental outcomes, preservation of open space and tree canopy, and a wider range of housing types while maintaining overall density targets.

Why Update Now?

Bellevue's PUD regulations have remained largely unchanged since the mid-1990s and have only been used ten times over the past two decades. While this suggests that the underlying Land Use Code (LUC)

effectively facilitates many standard development projects, the limited application of the PUD process indicates that the tool may no longer be calibrated to meet the unique challenges of today's more complex, infill-oriented sites. This update aims to update the PUD framework to ensure it remains a practical and predictable option for atypical development circumstances.

Policy Foundation

The proposed update is supported by multiple policy directives in the recently adopted Comprehensive Plan. Policy HO-24 encourages regulatory approaches that maximize housing variety and achievable density. Policy LU-41 directs the City to provide opportunities for increased density and height on larger sites to support clustering, efficient site planning, and preservation of trees and open space. Additionally, the Affordable Housing Strategy (Action AH.4.3) calls for amendments to the PUD code to allow greater flexibility to facilitate affordable housing development.

Key Opportunities for Improvement

These updates are intended to make the PUD framework a more effective implementation tool that aligns with current policy direction, expands housing opportunities, and enables more integrated and site-responsive development outcomes. While PUD standards and processes will be reviewed comprehensively, the following known opportunities for improvement have been identified:

- Increasing the minimum eligibility threshold to 10 acres instead of five;
- Replacing subjective 'compatibility' criteria with clear, predictable, and objective development standards;
- Expand flexibility for underlying development standards, including setbacks, lot coverage, and building placement;
- Clarifying increased height and density potential through the PUD process;
- Strengthening clustering provisions to encourage more compact development on less sensitive areas; and
- Incentivizing increased tree retention and affordable housing development.

Finally, the update will clarify and streamline the overall review and permitting process to reduce procedural complexity and align PUD provisions with current environmental regulations regarding critical areas and tree retention.

Overlake Farms Rezone

The proposal will also include a rezone of the Overlake Farms property within the Bridle Trails neighborhood. The Future Land Use Map designates a portion of the property as Low Density Residential, which supports multifamily development. To align with the Future Land Use Map, the property will be rezoned from Large Lot Residential (LL-1) to Low Density Residential 3 (LDR-3).

Separately, proposed PUD code amendments may be used to facilitate future redevelopment of the site on a reduced footprint with increased building height in exchange for enhanced retention of mature trees beyond underlying requirements and the provision of meaningful open space. A potential PUD on the site would be initiated by the property owner at a future date, following the adoption of the LUCA and rezones.

City Council Direction

On May 12, the City Council directed staff to initiate work on the LUCA and associated rezones. This discussion included the following themes:

Overlake Farms Height & Conservation Balance: Some residents expressed concerns over the potential for increased building height on the Overlake Farms site. Council noted that increased building height could be balanced by increased tree retention. Council provided staff with direction to explore a PUD incentive structure, potentially allowing building height up to 65 feet on sites similar to Overlake Farms, provided such height is conditional upon greater environmental protection, meaningful open space, and robust tree preservation.

- **Infrastructure Coordination:** Council emphasized that local capacity must move in tandem with density. Staff will ensure the LUCA aligns with ongoing infrastructure planning, specifically referring to recent municipal wastewater capacity studies.
- **Equity & Displacement in Upzone Areas:** Council raised equity considerations regarding the potential impacts of upzoning on immigrant and diverse communities within the Crossroads area.

PUBLIC ENGAGEMENT

Staff is implementing a two-phase engagement strategy to gather citywide input and address localized impacts. This approach ensures that the community provides feedback on project fundamentals before staff begins drafting specific code language. The engagement plan is provided as Attachment B.

- **Phase One (June–September 2026):** Focuses on listening and fundamentals. Staff will establish a baseline project scope and gather feedback on housing density priorities. Phase One concludes with an Engagement Summary Report delivered to the Planning Commission.
- **Phase Two (Q4 2026–Q1 2027):** Focuses on reviewing and drafting. Staff will solicit feedback on specific draft code language and density mechanics to ensure the final recommendation is practical and predictable.

Outreach Methods

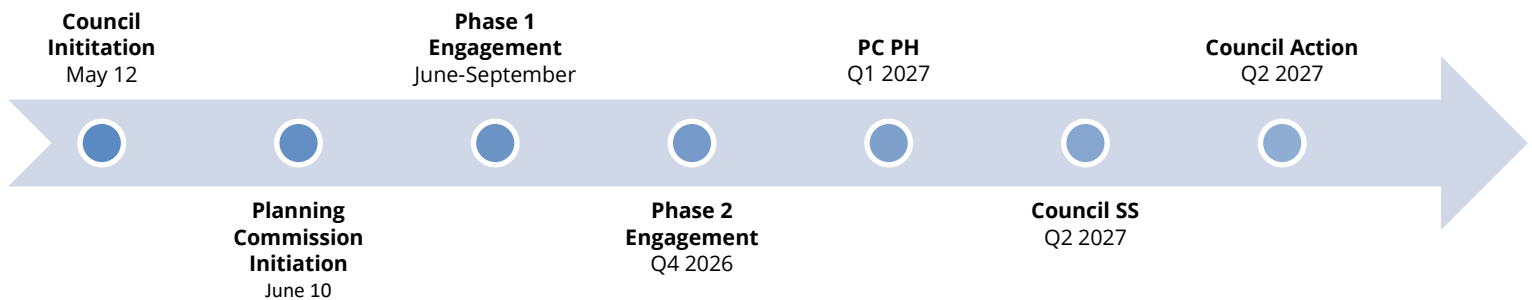
To ensure the public and interested parties have the opportunity to stay informed and provide comments, staff will utilize the following six modes of outreach:

- **Process IV Requirements.** Consistent with Chapter 20.35 LUC procedural requirements, public input will be solicited via a notice of application, notice of public hearing, and the required formal public hearing.
- **Public Information Sessions.** Staff will host at least two hybrid community open houses. These sessions will feature visual exhibits of objective development metrics and virtual sessions tailored for working professionals and developers to help visualize new housing densities.
- **Targeted Listening Sessions.** Focused sessions will be held with representatives from citywide neighborhood associations, the Bellevue Development Committee (BDC), and the PUD applicant

group. This includes direct dialogue with community leaders in Bridle Trails, Crossroads, and Factoria to address localized impacts.

- **Language Access and Equity.** In alignment with the City’s equity frameworks, staff will partner with neighborhood liaisons to translate fact sheets and visual exhibits into multilingual formats. This effort specifically targets high populations of non-English primary speakers in the Crossroads and Factoria subareas.
- **Direct Mail and Notifications.** Staff will distribute a physical mailer to all property owners and residents within a 1,000-foot radius of the proposed High-Density Residential (HDR) rezone areas.
- **Online Presence.** A dedicated project webpage will serve as a central hub for timelines, FAQs, preliminary drafts, and direct feedback channels.

Project Timeline

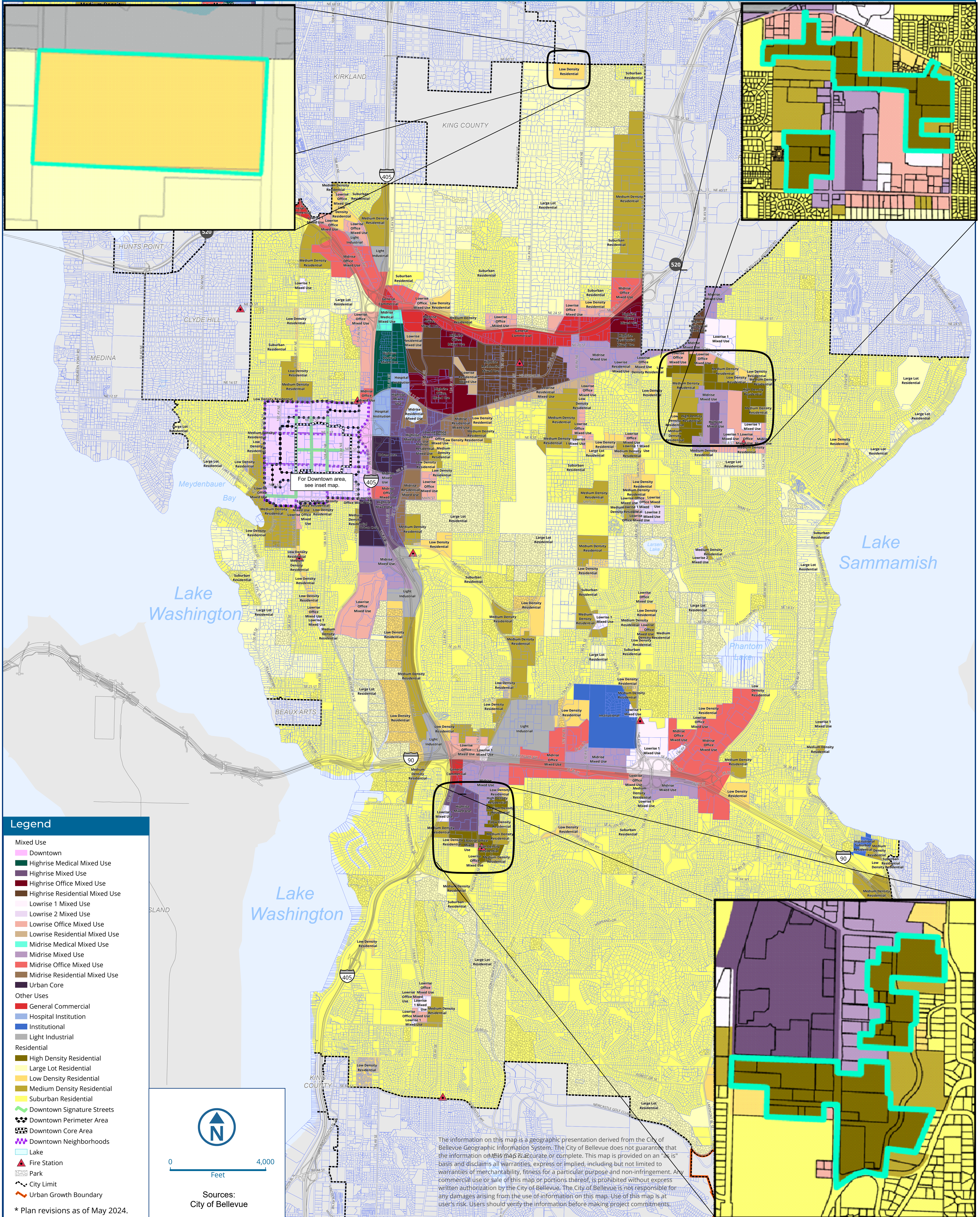


ATTACHMENT(S)

- A. Future Land Use Map (Factoria, Crossroads, and Overlake Farms rezones)
- B. Engagement Plan

Future Land Use

Attachment A

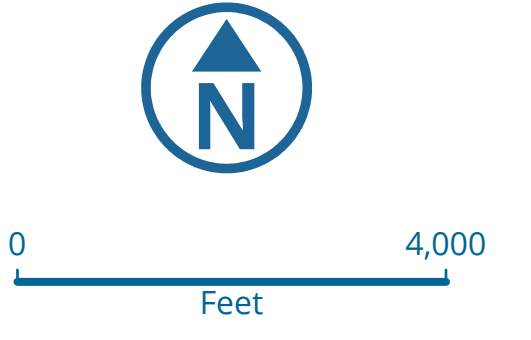


Legend

- Mixed Use
 - Downtown
 - Highrise Medical Mixed Use
 - Highrise Mixed Use
 - Highrise Office Mixed Use
 - Highrise Residential Mixed Use
 - Lowrise 1 Mixed Use
 - Lowrise 2 Mixed Use
 - Lowrise Office Mixed Use
 - Lowrise Residential Mixed Use
 - Midrise Medical Mixed Use
 - Midrise Mixed Use
 - Midrise Office Mixed Use
 - Midrise Residential Mixed Use
 - Urban Core
- Other Uses
 - General Commercial
 - Hospital Institution
 - Institutional
 - Light Industrial
- Residential
 - High Density Residential
 - Large Lot Residential
 - Low Density Residential
 - Medium Density Residential
 - Suburban Residential
- Other
 - Downtown Signature Streets
 - Downtown Perimeter Area
 - Downtown Core Area
 - Downtown Neighborhoods
 - Lake
 - Fire Station
 - Park
 - City Limit
 - Urban Growth Boundary

Sources:
City of Bellevue

* Plan revisions as of May 2024.



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HDR/PUD LUCA Engagement Plan

Updated May 2026

Project Introduction

The purpose of this project is to develop and implement a Land Use Code Amendment and rezone to establish a new High Density Residential (HDR) Land Use District and update Planned Unit Development (PUD) regulations. This initiative aligns with the 2044 Comprehensive Plan and the Future Land Use Map (FLUM). The new HDR district will be applied to designated areas within the Crossroads and Factoria neighborhoods, creating a residential category with a density that sits between MDR-2 and mixed-use development categories. Additionally, the LUCA will update PUD provisions to allow greater site flexibility and support affordable housing development.

Background

This LUCA implements the Comprehensive Plan by advancing policies that promote housing diversity and density and clustering to preserve open space and trees. In the Crossroads area, which includes a higher concentration of immigrant and low-income families relative to the rest of the city, the Puget Sound Regional Council (PSRC) has identified a higher risk of displacement. This engagement plan specifically addresses these concerns by integrating equity-focused outreach strategies. By updating the PUD code, the city also advances its Affordable Housing Strategy, providing the necessary regulatory flexibility to facilitate new affordable units within these projects.

Outcome

- Participation rates that reflect the demographic makeup of Crossroads and Factoria, specifically ensuring that low-income and immigrant households are represented in the feedback.
- Feedback from residents of Bridle Trails as it relates to a legislative rezone on a portion of the Overlake Farms site, as well as input from members of the applicant group and broader development community that results in PUD code flexibility that is practical, predictable, and supportive of affordable housing.
- Identification of specific community-led or policy-driven strategies to mitigate displacement risks in areas identified by the PSRC as high-risk.
- Rezone parcels in Crossroads and Factoria to High Density Residential and Overlake Farms to Low Density Residential consistent with the FLUM.
- Adopted code language that is cohesive, compliant with the Comprehensive Plan and its policies, and ensures appropriate alignment with references in code.

Engagement Overview

Phases of Engagement

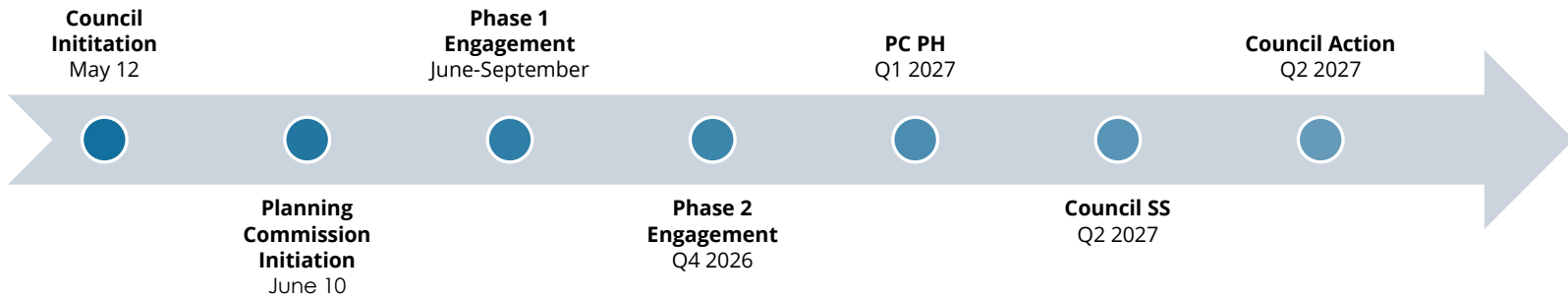
Phase 1: Listening, Fundamentals, & Early Code Development

- Time Frame: June-September 2026
- Public Engagement Goals:
 - Direct engagement with neighborhood associations and neighborhood leaders in Bridle Trails, Factoria and Crossroads. This may include dedicated meetings and participation in external events, such as tabling at neighborhood picnics.
 - Offer at least two virtual sessions to maximize accessibility for working professionals and developers.
 - Retain the use of in-person and virtual meetings in Crossroads and Factoria to help residents to visualize the impact of HDR and address any displacement concerns.
- Outcome: Confirmed scope of proposed code changes

Phase 2: Reviewing and Drafting

- Time Frame: Q4 2026 - Q1 2027
- Public Engagement Goals:
 - Share feedback gathered from Phase 1
 - Present draft code language directly to the BDC, community, and the Overlake Farms applicant group (as well as other potential PUD applicants) to ensure the mechanics of density calculations are practical and predictable.
 - Solicit feedback on recommended code changes
 - Focus resources on FAQ sheets specifically addressing rezoning impacts and displacement mitigation for the Crossroads community.
- Outcome: Full draft code amendments ready for Planning Commission Review in Q1 2027, with City Council action in Q2 2027

Timeline



Input

The project may benefit from insight from Neighborhood Area Plans in progress and recently completed for relevant neighborhoods. The plan prioritizes proactive, culturally sensitive outreach in the Crossroads and Factoria area to address concerns regarding rezoning and displacement risk while facilitating direct dialogue with Bridle Trails residents to address specific concerns regarding the Overlake Farms property. This coordinated approach ensures that technical updates to high-density residential districts are implemented through a transparent process that values neighborhood character alongside the city's broader housing goals.

Engagement Approach

Phase 1: Listening, Fundamentals, & Early Code Development

Website

Website has been set up: <https://bellevuewa.gov/code-amendments/high-density-residential-planned-unit-development-land-use-code-amendment>

- Centralize all updates, Planning Commission coordination, and the "Engagement Summary Report"

Community Mailer

- Partner with the Public Information Officer (PIO) and Graphics team to design and distribute a high-impact physical mailer to all property owners and residents within a 1,000-foot radius of the proposed HDR rezone areas. The community mailer will directly advertise and provide registration details for the Phase 1 Public Information Sessions/Community Open House.

Targeted Stakeholder Outreach through Public Information Sessions

Implementing High Density Residential

- Host hybrid community open houses localized in the Crossroads and Factoria neighborhoods.

- The sessions will be designed as informational briefings to educate property owners and residents on how the city is implementing the High Density Residential designations previously adopted under the Comprehensive Plan.
- Staff will guide attendees through a series of informational stations designed to clarify the transition from policy to land use code:
 - Looking at the Future Land Use Map, providing background on the Comprehensive Plan policies and how they guide the process towards implementation.
 - Using visual exhibits to help illustrate the intent behind the new HDR code. These exhibits will provide clear, predictable, and objective metrics regarding building heights, setbacks, lot coverage and transition buffers next to lower-density zones.
- Coordinate with Community Development to leverage their established neighborhood networks, equity frameworks, and liaisons.
- Prepare multilingual materials that address rezoning and the proposed LUCA.

Implementing the Planned Unit Development Update

- Development Community. Staff will present the planned updates to the current PUD code to the development community, ensuring outreach to both market-rate and affordable housing developers.
 - Focus on demonstrating how the new code:
 - Streamlines the current layout,
 - Improves requirements and opportunities, and
 - Introduces affordable housing into the PUD framework.
- Neighborhood and Community Associations. Staff will ensure coordination with established neighborhood associations citywide, including Bridle Trails.
 - Focus on informing the community on how a current and uniform PUD framework provides
 - Predictable, high-quality built outcomes,
 - Preservation of continuous tree canopy, high-quality open space, and critical areas (such as wetlands and steep slopes) along with their protective buffers, and
 - Design transitions whenever a comprehensive, planned unit development interfaces with an existing lower-density neighborhood edge.

City Newsletter Updates

- Project updates in city newsletters, including DSD Newsletter and It's Your City

Engagement Summary Report

- Develop a summary report to document community input and share with the Planning Commission and City Council

Phase 2: Reviewing and Drafting

Stakeholder follow-up

- Keep the stakeholders from Phase 1 engaged with project updates
 - Share feedback gathered from Phase 1 (engagement summary report)
 - Share draft once completed and solicit feedback

Public Information Session

- Once the draft code is developed, host public information sessions once the draft code is released to answer questions and gather direct input.

City Newsletter Updates on project progress

- Regular project updates in city newsletters, including DSD Newsletter and It's Your City

CITY OF BELLEVUE
BELLEVUE PLANNING COMMISSION
MINUTES

May 13, 2026
6:30 p.m.

Bellevue City Hall
Room 1E-113

COMMISSIONERS PRESENT: Chair Khanloo, Vice Chair Lu, Commissioners Ferris, Goepple, Kennedy, Nilchian, Villaveces

COMMISSIONERS REMOTE: None

COMMISSIONERS ABSENT: None

STAFF PRESENT: Kate Nesse, Thara Johnson, Community Development Department; Nick Whipple, Development Services Department; Matt McFarland, City Attorney's Office

COUNCIL LIAISON: Councilmember Bhargava

GUEST SPEAKERS: None

RECORDING SECRETARY: Gerry Lindsay

1. CALL TO ORDER
(6:30 p.m.)

The meeting was called to order at 6:30 p.m. by Chair Khanloo who presided.

2. ROLL CALL
(6:30 p.m.)

Upon the call of the roll, all Commissioners were present.

3. APPROVAL OF AGENDA
(6:31 p.m.)

A motion to approve the agenda was made by Commissioner Ferris. The motion was seconded by Commissioner Goepple and the motion carried unanimously.

4. REPORTS OF CITY COUNCIL, BOARDS AND COMMISSIONS
(6:31 p.m.)

Commissioner Bhargava acknowledged the recent commission appreciation event held at City Hall, noting that there had been strong representation from the Planning Commission.

The City Council’s May 12 meeting included a briefing from the King County Wastewater Treatment Division concerning sewer system rates, capacity forecasts, and long-term infrastructure planning over the next 20 years, with particular emphasis on the coming six years.

Commissioner Bhargava reported that the Council took action to advance the high-density residential planned unit development Land Use Code amendment and the related rezones stemming from the 2024 Comprehensive Plan updates. The Council also adopted an ordinance concerning targeted residential protests and the associated criminal conduct provisions.

5. STAFF REPORTS

(6:42 p.m.)

A. Planning Commission Meeting Schedule

Staff Liaison Dr. Kate Nesse took a few minutes to review the Commission’s schedule of upcoming meeting dates and agenda items.

Commissioner Ferris questioned holding three public hearings at the July 22 meeting. Dr. Kate Nesse explained that one involves a minor change and will move forward quickly. The other two will have more engagement but not be overly long.

6. WRITTEN AND ORAL COMMUNICATIONS

(6:43 p.m.)

A. Written Communications

(6:43 p.m.)

Dr. Kate Nesse noted that four written communications had been received and distributed to the Commissioners earlier in the day. No additional submissions were received subsequently.

B. Oral Communications

(6:44 p.m.)

Chair Khanloo reviewed the procedural rules, including the three-minute time limit per speaker, the total 30-minute allotment for oral communication, and the requirement under Ordinance 6752 that comments relate to matters within the Planning Commission’s authority.

Alex Tsimerman delivered remarks criticizing the Commission and city governance while repeatedly diverging from agenda-related subjects. During the comments, the Chair twice interrupted to remind the speaker of the requirements under Order 6752 and requested that remarks be confined to agenda-related matters and appropriate language. Despite the interventions, the speaker continued with generalized criticisms concerning free speech, public meeting procedures, and government.

7. PUBLIC HEARING – 2026 Omnibus LUCA
(6:50 p.m.)

A motion to open the public hearing was made by Commissioner Kennedy. The motion was seconded by Commissioner Ferris and the motion carried unanimously.

Code and Policy Director Nick Whipple explained that the Commission was being asked to conduct the public hearing and subsequently provide a recommendation to the City Council regarding the proposed Land Use Code Amendment package. The presentation reviewed the overall scope of the omnibus amendments, including straightforward clean-up corrections such as scrivener's errors, outdated cross-references, and typographical revisions. The amendments were described as being required to maintain compliance with state law. The limited policy adjustments are intended to better align the code language with the existing adopted policy objectives discussed at a Commission meeting in April.

Nick Whipple said one of the amendments involving limited policy consideration concerned the continued allowance of single-family residential development within areas designated in the Comprehensive Plan for higher-density residential uses. Portions of the existing Land Use Code were no longer aligned with the Future Land Use Map adopted through the Comprehensive Plan update process. In particular, some areas planned for densities of approximately 30 dwelling units per acre still permitted single-family development. The proposed amendment seeks to better align the zoning regulations with the adopted policy objectives by prioritizing multifamily residential development in designated high-density areas while maintaining ample opportunities for single-family housing elsewhere in the city.

With regard to the revisions affecting the SR-1 suburban residential district, Nick Whipple explained that the district had previously been grouped with the Large Lot residential categories despite having substantially smaller lot sizes more comparable to standard suburban residential zones. The practical implementation of the recently adopted tree code revealed calibration problems within the SR-1 district. In some redevelopment cases, applicants were required to plant as many as 90 trees or pay fee-in-lieu amounts exceeding \$150,000, outcomes considered to be disproportionate when compared with requirements elsewhere in the city. The proposed amendment regroups SR-1 with residential categories possessing more comparable lot dimensions.

Under the existing code provisions, relatively minor projects such as restriping parking lots or adding electric vehicle parking spaces can trigger full site compliance with the tree code, substantially increasing project costs beyond the original scope of work. Examples were cited in which project budgets more than doubled because of the requirements. The amendments are intended to prevent narrowly focused improvements from inadvertently triggering extensive landscaping and tree compliance obligations.

Nick Whipple also described a series of process-related amendments intended to improve efficiency and consistency within the permitting system. Previously, development process requirements were dispersed among multiple overlay districts, including BelRed, Downtown,

East Main, and Eastgate, each with somewhat different procedural provisions. The proposed amendments consolidate the master development plan requirements, design review procedures, and departure processes into a unified process chapter within the Land Use Code. The changes were described as primarily organizational and procedural rather than substantive policy changes. The goal is to streamline administration and simplify the code structure citywide.

The Commission's April 8 study session resulted in feedback from the Commission and stakeholders. The Commissioners had expressed interest in allowing residential development projects within the East Main Transit-Oriented Development area to utilize a fee-in-lieu option similar to the option already available to commercial developments. Nick Whipple confirmed that the change had been added to the revised draft ordinance.

With regard to the conditional use permit decision criteria, it was noted that an earlier draft had proposed removing language requiring conditional use permits to remain consistent with the Comprehensive Plan. Following additional internal review and consideration of how the criteria has historically been applied, particularly to school-related projects, staff determined that consistency with the Comprehensive Plan remains an important requirement. Accordingly, the amendment restores the longstanding decision criterion, an approach that differs from the version previously presented during the April study session.

Nick Whipple said the proposal includes a substantive revision involving the residential lot splitting regulations. The city updated its approach following new interpretive guidance issued by the Washington State Department of Commerce. Under the earlier draft language, any lot created through the residential lot split process would have been prohibited from further subdivision. The Department of Commerce subsequently clarified that while a property owner could not repeatedly use the lot split process on the same parcel, the resulting lots could still undergo additional subdivision through conventional short plat procedures if they otherwise meet the applicable standards. The proposed code language was revised to reflect that interpretation, allowing for subsequent subdivision through the standard platting process while prohibiting repeated use of the lot split process. Bellevue is among the first jurisdictions implementing the new state lot splitting legislation.

Commenting on the outreach and engagement efforts associated with the proposal, Nick Whipple indicated that much of the internal consultation involved land use planners identifying recurring code issues encountered during project review. Input was also solicited from the development community and residents where appropriate, and the project scope was previously reviewed with both the Planning Commission and the City Council. The outreach process primarily was informational and remained open to public feedback and comment.

Nick Whipple explained that following the public hearing and the forwarding of a recommendation from the Commission, the proposal will proceed to the City Council in June, with final Council action anticipated by July. The Commissioners were reminded that any recommendation must find the proposed amendments consistent with the Comprehensive Plan, supportive of the public health, safety, and welfare, and not contrary to the interests of Bellevue residents and property owners.

Chair Khanloo then turned to public comment on the proposed Land Use Code Amendment.

Jessie Clawson with McCullough Hill expressed support for advancing the omnibus amendment package to the City Council and specifically thanked both the Planning Commission and staff for incorporating the fee-in-lieu provision for the East Main Transit-Oriented Development area. The ordinance is relatively straightforward and hopefully will move through the approval process efficiently.

Phyllis White spoke representing a local SR-1 neighborhood regarding concerns about tree preservation and wildlife protections within the area. Many residents in the neighborhood are first-time homeowners. The community appreciates its mature natural environment, including the streams, wildlife habitats, bald eagle nests, blue herons, and trees estimated to be more than 200 years old and reaching heights of approximately 175 feet. While acknowledging that future growth and development within SR-1 areas is expected and not opposed by residents, the community desires to preserve the wildlife habitat and mature trees. The neighborhood should retain its SR-1 designation until the city can further analyze the area's potential value as a wildlife refuge and conservation area.

A motion to close the public hearing was made by Commissioner Ferris. The motion was seconded by Commissioner Goepple and the motion carried unanimously.

Commissioner Lu asked for clarification in regard to how partial tree credits will be calculated when a tree trunk straddles a property boundary, and also asked how such situations might be addressed if a tree extends across more than two lots, such as at a corner intersection. Nick Whipple explained that the proposed amendment arose from practical difficulties encountered by staff when regulating property line trees. Under the existing code, property line trees receive no credit because the code is silent on how such trees should be treated, effectively removing incentives to preserve them. The proposal allows partial credit for trees whose trunks cross property lines. It is the trunk itself that must be determined to exist exactly on the property line rather than the canopy or root system. If a survey shows any portion of a trunk extends onto a property line, the tree will qualify as a property line tree and receive a discounted credit of 0.5 for regulatory purposes. More complex multi-property situations involving three or four adjoining lots could eventually require additional code interpretation.

Commissioner Nilchian asked if staff had considered granting a full one-to-one tree credit rather than a partial 0.5 credit for property line trees. A concern was expressed that awarding full credit could potentially incentivize the removal of trees by allowing too much compliance credit for too few trees, and staff was asked if there were any data or examples from other jurisdictions that use alternative approaches. Nick Whipple noted that during the original drafting of Bellevue's tree code, staff reviewed numerous tree preservation ordinances from other jurisdictions, particularly those employing tree credit systems. Property line tree regulations of the type currently under discussion are not commonly addressed explicitly in the codes from other jurisdictions. Further outreach will likely be necessary to gather comparative information. Granting full credit for shared property line trees could unintentionally reduce tree retention overall by allowing fewer

trees to satisfy the compliance requirements.

Commissioner Villaveces encouraged staff to consider expanding eligibility for tree credits beyond the physical trunk location to include portions of the critical root zone that extends across property lines. If a neighboring tree's root system and canopy affects the development on an adjoining property, and if the property owner is already obligated to protect those roots during construction, some degree of tree credit should also be provided. Using the inner critical root zone rather than the trunk itself might better reflect the interconnected nature of tree preservation responsibilities.

Commissioner Kennedy noted the receipt of comments from the Kelsey Creek Neighborhood Association, and comments submitted by Tesla. Referring first to the testimony from the Kelsey Creek Neighborhood Association, it was suggested that the city should explore whether there are particular conditions within that neighborhood, such as proximity to critical areas, parks, or wildlife corridors, that might justify additional protections separate from the omnibus code amendment. Staff was encouraged to continue discussions with neighborhood representatives regarding potential preservation strategies.

With regard to the comments from Tesla, Commissioner Kennedy asked if the proposed amendments adequately address the issues that might unintentionally hinder the installation of electric vehicle charging infrastructure under the existing tree code. An interest was expressed in ensuring that the city continues to encourage EV charging deployment while refining tree code implementation thresholds. Nick Whipple said the Tesla comments were in support of the omnibus amendment package. The concern involves projects where parking lots are merely being restriped or reconfigured to accommodate electric vehicle charging stations without expanding the impervious surface area or adding new parking stalls. Under the current code, even such limited modifications trigger full tree code compliance. Staff considers that threshold to be too low. The proposed amendments instead rely on a more substantial threshold involving a 20 percent increase in impervious surface area or lot coverage before the full tree code requirements apply. Staff does not believe minor parking lot restriping projects should require extensive additional tree planting obligations.

Commissioner Goeppele voiced support for the proposed revisions.

Commissioner Ferris voiced support for Commissioner Kennedy's earlier suggestion that staff continue engaging with the Kelsey Creek neighborhood regarding its unique environmental character and potential preservation concerns. Support was also expressed for the omnibus amendment package as drafted.

Chair Khanloo agreed with the need to continue focusing on the SR-1 neighborhoods and the issue of tree preservation, specifically referencing the Kelsey Creek neighborhood and similar areas characterized by distinctive natural environments. Emphasized was the importance of identifying approaches that will incentivize retention of mature trees and preserve wildlife habitat. In the Downtown area there is a noticeable absence of birds and wildlife, largely due to the lack of tree canopy and ongoing construction activities.

Vice Chair Lu recalled an earlier discussion about excluding species such as cottonwoods and alders from receiving tree credits and asked staff to confirm if that direction had been incorporated into the proposed amendments. Nick Whipple said the prior policy direction regarding cottonwoods and alders was retained in the draft amendments. The proposal maintains zero credit for those trees.

Vice Chair Lu asked about the rationale behind the proposed lot splitting provisions that permit one residential lot split but prohibits repeated use of the same process on the resulting parcels. Nick Whipple explained that the limitation is dictated directly by state statute and is likely intended to prevent piecemeal subdivision practices that could circumvent procedural requirements otherwise triggered by larger subdivision applications. While the interpretation of the legislative intent is somewhat speculative, the Washington State Department of Commerce has reinforced the approach as being the proper statutory interpretation.

Commissioner Ferris returned to the issue of property line trees and critical root zones and voiced support for recognizing root systems that extend across property lines. However, any such approach should preserve full tree credit for the property owner hosting the trunk itself. Neighboring properties impacted by a root system might receive an additional fractional credit without diminishing the primary owner's full credit for preserving the tree.

A motion to recommend adoption of the 2026 Omnibus Land Use Code Amendment and forward it to the City Council given that the proposal satisfies the applicable Land Use Code decision criteria, is consistent with the Comprehensive Plan, serves the interests of Bellevue residents and property owners, and enhances the public health, safety, and welfare, was made by Commissioner Goepple. The motion was seconded by Commissioner Ferris.

A motion to amend the motion to change the credit system definition to refer to the inner root system rather than the trunk was made by Commissioner Villaveces. The motion to amend was seconded by Vice Chair Lu.

Commissioner Goepple questioned how to define "inner root system" and questioned if the standard could even be implemented. Nick Whipple allowed not being familiar with the term. The language used needs to align with formally defined industry standards, and it needs to be clear, objective, and readily implementable. Even the proposed 0.5 property line tree credit has already introduced additional administrative complexity for land use review staff, and further expanding the criteria could complicate implementation and potentially necessitate future corrective amendments.

Commissioner Nilchian voiced opposition to the proposed amendment to the motion despite understanding the intent behind rewarding the preservation of neighboring tree root systems. The concern is that extending tree credits based on root systems could unintentionally reduce overall tree retention by allowing properties without trees of their own to satisfy tree credit requirements solely through neighboring trees. Such an outcome would undermine the intended incentive structure of the code and could ultimately result in fewer trees citywide.

Vice Chair Lu stated appreciation for the intent behind the proposal but similarly expressed reservations regarding the administrative burden that would accompany its implementation. Applying such a standard will likely require individualized lot-by-lot analysis to determine the extent and location of root systems, increasing complexity and the workload for city staff.

The motion to amend failed with no one voting for it.

The main motion recommending approval of the 2026 Omnibus Land Use Code Amendment package carried unanimously.

8. STUDY SESSION – None
(7:28 p.m.)

9. OTHER BUSINESS – None
(7:28 p.m.)

10. APPROVAL OF MINUTES

A. April 8, 2026

A motion was made by Commissioner Ferris and seconded by Vice Chair Lu to approve the minutes from the April 8 meeting, and the motion passed without objection.

11. EXECUTIVE SESSION – None
(7:29 p.m.)

12. ADJOURNMENT
(7:29 p.m.)

The meeting concluded with a motion to adjourn by Commissioner Ferris. After receiving a second by Vice Chair Lu and unanimous approval, Commissioners briefly remarked that the meeting had set a record for brevity, lasting approximately forty-nine minutes. Commissioners then exchanged closing remarks before adjournment.

Chair Khanloo adjourned the meeting at 7:29 p.m.