

| Code Section  | Topic                            | Comment(s)   | Response/Notes  | Status                                      | Comment Tracker Version |
|---------------|----------------------------------|--|---|---|-------------------------|
| 20.10.445.B.5 | Permitted Uses                   | B.5.a. Manufacturing uses are limited in size to 20,000 gross square feet (or 25,000 gross square feet when continuing manufacturing uses and educational facilities). The industrial nature of BelRed should be reflected here, and there should be express carve-out for existing manufacturing uses so these uses do not need a departure and/or treatment as nonconforming uses.   | At present, manufacturing uses are already limited in size to 20,000 square feet, and are only permitted in the BR-GC and BR-CR districts. The proposed draft will maintain this approach, introduce a little flexibility to go up to 25,000 square feet, and expand this use as an option throughout BelRed. The draft is actually increasing flexibility for manufacturing compared to the current code.<br><br>The updated citywide nonconforming code is based on the current BelRed approach. The citywide nonconforming code is based on the current BelRed "existing use/structure/site" framework. While it's a shift in terms, the citywide nonconforming code is essentially maintaining the status quo for these uses. | No change proposed                          | 1                       |
| 20.10.445.B.5 | Permitted Uses                   | Auto dealership uses should be permitted outright in all zones, subject to development standards. Car dealerships are a major source of tax revenue for the city and can co-exist with housing and other uses.   | Auto dealers are allowed throughout BelRed in an urban format, consistent with the agreement reached under Wilburton. Car dealerships are still permitted outright in BR-GC. This topic was reviewed at length through the Wilburton process, and staff believe that the proposed approach strikes a good balance.  | No change proposed                          | 1                       |
| 20.10.445.B.5 | Permitted Uses                   | Consider how car dealerships are being treated in terms of nonconformity.  | There may be newly-nonconforming car dealerships, as the area where dealerships are allowed outright is reduced. These dealerships will still have the ability to expand and upgrade consistent with the nonconforming code. We welcome suggestions on how the options for proportional compliance can be expanded to support existing businesses.  | No change proposed                          | 1                       |
| 20.10.445.B.5 | Permitted Uses                   | Warehouse uses become a non-permitted use. Those uses are currently allowed in the BR-OR and BR-GC zones. Unlike other industrial uses, warehouse uses are often smaller scale. This could create a lot of new nonconformities (or uses that have a messy permitting history and might not be designated legal nonconformities). Warehouses support arts uses and other services we want to see in BelRed. Warehouse use should be permitted outright. | Updated language to maintain warehouses and storage as a permitted use in BR-GC. This is supported by the subarea plan.   | Complete                                    | 1                       |
| 20.20.010     | Dimensional Standards            | Clarify that floorplates are unlimited for buildings less than 100' tall.  | Confirmed. Floorplate limits only apply to towers, and citywide definition of tower applies. This definition confirms that these are only buildings taller than 100'.   | Complete                                    | 1                       |
| 20.20.010     | Dimensional Standards            | Recommend increasing mass timber residential floor plate to 30,000 sf, otherwise difficult to achieve FAR given building code constraints on mass timber height.   | Updated language in draft to 30,000 sf.   | Complete                                    | 1                       |
| 20.20.010     | Dimensional Standards            | Floor plates should be increased for residential up to 25,000 for mass timber projects. Currently limited to 20K in 20.25B.040.B.3.b. A pipeline project is finding that 25K is the sweet spot—20K previously wasn't really designed.  | Updated language in draft to 30,000 sf.   | Complete                                    | 1                       |
| 20.20.525     | General Development Requirements | Regarding mechanical equipment - Positive change, but we should clarify in BR specific or in mechanical code that PSE switch boxes are not considered mechanical equipment; these are required to be located where PSE requires them. In addition, corrections are coming asking transformers to be located in building; that's not necessarily what PSE wants.  | Staff recommend maintaining location standards for all mechanical equipment, including PSE switch boxes. Staff is aware of challenges working with PSE, and has been engaging them earlier in the review process to develop options for switch box locations, including locating inside buildings.  | No change proposed                          | 1                       |
| 20.20.590     | Parking                          | Update code to allow tandem parking to count to meet minimum parking requirements.   | Will be implemented separately through the Parking Reform LUCA.   | Change to be implemented in another project | 1                       |
| 20.20.590     | Parking                          | Reconsider size of bike rooms based on feedback from Wilburton dimensional requirements.   | Maintaining Wilburton approach.<br><br><b>Version 2 Update:</b> Parking Reform LUCA will establish consistent bike parking requirements, remove subarea-specific standards where no longer required. While no change is proposed to these standards, that project is a better venue for consideration.  | No change proposed                          | 1                       |

| Code Section                  | Topic                              | Comment(s)  | Response/Notes   | Status             | Comment Tracker Version |
|-------------------------------|------------------------------------|---|--|--------------------|-------------------------|
| 20.25B                        | General Applicability to BelRed    | Confirm what the definition of small site is in Bel-Red and how does it work?   | The current definition established in 20.50 will apply: "A lot in a Mixed-Use Land Use District, established under LUC 20.10.020 and described in LUC 20.10.398, and in existence prior to January 1, 2025, that is less than or equal to 40,000 square feet in area and corresponds to the project limit within which the small site is located. This definition does not apply to lots less than 40,000 square feet in area that are aggregated into a project limit that is greater than 40,000 square feet." | No change proposed | 1                       |
| 20.25B                        | General Applicability to BelRed    | Confirmation of building overhangs over sidewalks. Current interpretation in Wilburton is that "building cantilevers cannot be constructed over public ROW," which City is interpreting to include sidewalks in private ownership subject to a public easement. This is different from downtown and should be clarified.  | Under the current code, buildings can cantilever over sidewalks in private ownership subject to a public easement. There are cases where the sidewalk is owned and maintained by the City but is located on private property.  | No change proposed | 1                       |
| 20.25B                        | General Applicability to BelRed    | Should also clarify loading and trash/recycling standards and ensure they are fixed. We understand there was a problem here.  | 20.20.725 LUC establishes standards for recycling and solid waste collection areas, including conditions for using temporary staging areas.  | No change proposed | 1                       |
| 20.25B.030                    | Site Organization and Public Realm | Site daylighting or restoring a stream under the CAO should be exempt from Green Factor or have a multiplier of 2x or more.<br>Delete the word "required" from the second sentence of 20.25B.030.C.2.d. The 0.3 ratio is based on a normal building footprint without driveways or parking areas, and this is true whether the driveway or parking area is required by the city or not.       | Critical areas and their buffers are already exempt from the Green Factor, added clarifying language to note that this includes daylight streams.  | Complete           | 1                       |
| 20.25B.030                    | Site Organization and Public Realm | D.4. Canopy requirements need more clarity. What is required depth? What is the purpose and scope? This could be big cost. Refine language to ensure intent remains clear.  | Applying minimum depth of 6 feet, consistent with downtown. May need to be increased when higher weather protection is provided, also addressed in this subsection.  | Complete           | 1                       |
| 20.25B.040                    | Building Design                    | Make explicit that floorplates are unlimited for all buildings under 100' tall. Define "Towers" as buildings greater than 100'. (Or confirm you agree the existing definition in 20.50.048 makes this clear.)   | We confirm that 20.50 LUC definition of "Tower" will apply: "Any building with a minimum height of 100 feet or greater"  | No change proposed | 1                       |
| 20.25B.040                    | Building Design                    | Section B.5 – Façade Modulation: include a depiction to provide clarity so projects don't get hung up in ADR. This section needs some additional review/examination. If you're set back 15'1" from the public right of way is modulation required? Why 60' vs. 85'? Exempt midrise? Why is c. only applicable to mass timber? The language in b suggests a 15' setback exempts all buildings. | Current draft maintains Wilburton approach, only changes are to reflect updates needed for consistency with state law (HB 1183).   | No change proposed | 1                       |
| 20.25B.040                    | Building Design                    | Section C.4 – Mechanical Equipment Screening. Screening from above should only apply to mechanical equipment located less than 85' in elevation. A 250' building should not have to do overhead screening on the roof.  | Land Use staff recommend retaining this requirement as established practice in the city. Screening options include simply painting to match, which seems reasonable.   | No change proposed | 1                       |
| 20.25B.040                    | Building Design                    | In C.4.b and C.4.a – Remove the phrase "in order of preference" in list of options for screening mechanical equipment. This is arbitrary and will create plan reviewer issue in ADR.  | Removed. This provides additional flexibility for screening from above, as noted in previous comment.  | Complete           | 1                       |
| 20.25B.040                    | Building Design                    | D.2.a – Parking Structures: Remove "All above-grade floors of a parking structure shall be horizontal with a floor-to-ceiling height of at least 10 feet to accommodate future adaptive reuse of the space, except for ramps providing circulation between floors."   | We anticipate that parking demand will decrease in years ahead, and see this as a reasonable standard to help enable the conversion of parking structures to occupiable space in the future.   | No change proposed | 1                       |
| 20.25B.040                    | Building Design                    | Maintain 50' tower separation instead of applying Wilburton 60' separation.   | Maintaining Wilburton standard. The Wilburton standard is also consistent with Downtown.   | No change proposed | 1                       |
| 20.25D.015<br>Or<br>20.50.046 | Definitions                        | Define the "Street Grid" as the walkable, bikeable network created by the 1,200-foot maximum block lengths.   | "Street Grid" is not a term informing any regulations in the code. There are standards for the area subject to block limits, and there are defined local street and green street segments.   | No change proposed | 1                       |
| 20.25D.020                    | Access and Connectivity            | How are sites impacted by both critical areas and the street grid treated?  | The number of defined required segments has been reduced, and included removing segments which were problematic due to known critical area interactions. The updated CAO also provides additional flexibility for development on sites with degraded critical areas.   | No change proposed | 1                       |

| Code Section          | Topic                           | Comment(s)   | Response/Notes  | Status                           | Comment Tracker Version |
|-----------------------|---------------------------------|--|---|----------------------------------|-------------------------|
| 20.25D.020            | Access and Connectivity         | New street typologies are good for flexibility but need to add the shared use path; no emergency vehicles.   | Added a new "Enhanced Shared Use Path". Also provide the opportunity for these paths to qualify as outdoor plazas under the amenity incentive system when achieving all design criteria while maintaining 14 feet travel lane throughout.   | Complete                         | 1                       |
| 20.25D.020            | Access and Connectivity         | If there are two sites with existing buildings, and the existing buildings are separated with 9 feet of distance, what happens when one site redevelops? Will the result be an interim street built close to the existing building on the other site?  | Yes, interim streets would be the solution. The first site to develop would build an interim street along the property line.  | No change proposed               | 1                       |
| 20.25D.020            | Access and Connectivity         | Codify flexibility in street implementation within master-planned projects. In certain cases, rigid application of the grid may conflict with feasible building layouts. Removing the local street requirements from our site and generally allowing flexibility where projects deliver strong urban design outcomes would help ensure development can occur while still meeting connectivity objectives.  | <b>Version 2 Update:</b> The draft has been updated with criteria to substitute local street segments for private streets through development review process, additional flexibility is still under consideration   | Complete                         | 1                       |
| 20.25D.020            | Access and Connectivity         | Allow use of a woonerf-style pedestrian street to frame blocks   | This is possible with established private access corridors, though not currently possible for defined local street segments.<br><br><b>Version 2 Update:</b> The draft has been updated with criteria to substitute local street segments for private streets through development review process, additional flexibility is still under consideration   | No change proposed               | 1                       |
| 20.25D.020.B          | Access and Connectivity         | One challenge described is understanding whether or not a pedestrian connection would apply to a site, it might not have connectivity but would be subject to block length requirements. Consider allowing sites with certain frontage length or less are not required to provide that connection, or in cases when adding it would be over X percentage of the property. Is it fair or possible to add flexibility here?  | Believe that reducing the number of required segments and providing additional language around flexibility should resolve such issues, but please bring remaining cases forward.  | No change proposed               | 1                       |
| 20.25D.020.B.1.b      | Access and Connectivity         | What does "generally consistent" mean in this section?   | It means that, while the specific segment must be provided, there can be flexibility around its precise location. This flexibility depends on the specifics of the site, proposal, and surrounding network.   | No change proposed               | 1                       |
| 20.25D.020.B.2.b      | Access and Connectivity         | Why isn't pedestrian access corridors one of the options available to break down a block?  | A new shared use path option, paired with area for landscaping and amenities, can now be used to frame blocks. In addition, can be paired with a plaza amenity.   | Complete                         | 1                       |
| 20.25D.020.B.2.c      | Access and Connectivity         | What is the rationale behind the maximum block perimeter?  | This limit only applies to determine whether block size limits apply. It is intended to provide some additional flexibility to allow sites slightly larger than the 1,200 foot perimeter to develop without triggering block size requirements. It was informed by a parcel analysis.   | No change proposed               | 1                       |
| 20.30H.115.C          | Departures                      | D. Support departures for all dimensional standards in the code, including in Ch. 20.20.   | Current draft maintains Wilburton approach, which allows administrative departures for many numerical standards. In lieu of expanding departures further, prefer suggestions of items which are recurring departure requests which may require a code fix, or suggestions of ways to build in more targeted flexibility.  | No change proposed               | 1                       |
| 20.15.100             | Affordable Housing Requirements | If MHA is required projects should also be allowed to participate in the MFTE program without lower AMI levels similar to Wilburton  | Updates to MFTE are being led through Office of Housing in a separate parallel project.   | Under review in separate project | 2                       |
| 20.15.100 - 20.15.150 | Affordable Housing Requirements | Provide an affordable housing exemption for the first 1.0 FAR of development to be consistent with the property rights already afforded to the Bel-Red area. Currently all land in Bel-Red is allowed to develop to 1.0 FAR without providing any public benefits, such as affordable housing or other amenities. Applying the public benefit requirements above the base floor area in existence today is consistent with the City's position in the Downtown HOMA LUCA, and better avoids a claim that the requirements are inconsistent with state and federal law. | Base and max FAR have increased substantially, staff do not recommend providing additional exemptions to account for MHA. Base FARs for several districts were originally set for Wilburton, and are higher to account for mandatory affordable housing. In addition, all affordable housing and affordable commercial is exempt from max FAR calculation. The MHA fee approach has been supported by a nexus study, as is required by law. | No change proposed               | 2                       |

| Code Section | Topic                            | Comment(s)   | Response/Notes   | Status             | Comment Tracker Version |
|--------------|----------------------------------|--|--|--------------------|-------------------------|
| 20.15.110    | Affordable Housing Requirements  | <p>We support the mandatory affordable housing requirements in BelRed as the sole proposal by staff. This affordable housing approach is supported by the large increases to density and height. We also appreciate how concurrent updates of the MFTE program can support the affordable housing requirement beyond the value exchange through the upzone.</p> <p>The fee in lieu is proposed to start at \$16.50 /non-exempt gross square foot for nonresidential and \$13.00 /non-exempt gross square foot for residential. We urge staff to set the initial fee in lieu amount such that it encourages a feasible mix of compliance through both unit production and fee-in-lieu payments. Based on analysis from the Wilburton code update, a balanced fee schedule (i.e. the fee level is approximately the same as the cost of producing units onsite) is likely much higher for both residential and non-residential, perhaps even in the \$27-\$42 range for residential development, depending on the construction type and other project characteristics.</p> <p>We do not support catalyst provisions at this time, which would reduce performance requirement or fee-in-lieu amounts or fee growth structure for a set initial amount of units and/or time (ex: 5% vs. 10% set-aside for the first 200 units in permitting or 1 year)</p> <p>We support the pairing of the affordable housing requirement with MFTE when this package goes to City Council. We urge the city to avoid committing to a specific MFTE structure, such as the "Wilburton Supercharger," until additional analysis is conducted and the city is confident that they are balancing benefits for a stronger development incentive with the affordability benefits provided through double-counted units. Please take into account the value that is created through the upzone which, from a legal perspective, is what is intended to offset the cost of providing affordable housing.</p> | <p>Ongoing analysis will inform the amenity incentive system and affordable housing requirement, to be reviewed at a future study session. MFTE updates will also be reviewed parallel to the City Council process, led by the Office of Housing.</p>  | In Progress        | 2                       |
| 20.15.150    | Affordable Housing Requirements  | <p>Is the BelRed fee going to match the Wilburton fee in real time? It's important to consider the catalyst and the CPI kicker on this conversation.</p>   | <p>Under review, to be discussed at future study session.</p>  | In Progress        | 2                       |
| 20.15.150    | Affordable Housing Requirements  | <p>When it comes to copying and pasting the standards for Wilburton, it's important to take into consideration that BelRed is coming from a different starting place that has an existing incentive system with a 1 FAR base</p>   | <p>Base FARs have been increased significantly across all of BelRed's land use districts that are subject to the amenity incentive system.</p>   | No change proposed | 2                       |
| 20.20.010    | Dimensional Standards            | <p>Under 20.20.010 of the draft code, the Base FAR in MUM-H is 4.0 for nonresidential, while the MUO-H zone is at 6.0. Other than the base FAR, all of the other dimensional requirements, and the Max FAR, are the same, and the MUO-H zone is adjacent to MUM-H, so we'll likely compete for similar uses. In the interests of creating a level playing field I would appreciate it if you would modify the MUM-H base FAR to 6.0 so that zone doesn't have a penalty as compared to the MUO-H.</p>  | <p>The BelRed Subarea Plan and Bellevue Economic Development Plan have both identified the 116th corridor as a priority area for growth in medical and life sciences uses, and setting a higher base FAR for nonresidential is consistent with this objective. Currently, nonspecialized residential development is not permitted at all in this area, so introducing a lower base far of 4.0, with the same maximum height and FAR possible as nonresidential, provides a great compromise.</p> | No change proposed | 2                       |
| 20.20.010    | General Development Requirements | <p>For dimensional standards - Delete footnote 6 and require a consistent 4.0 base FAR in MUM-H. Explained that MUM-H with a 2.0 base will require more participation in the amenity incentive system which is "far out of scale with the rest of the area" and the low FAR base will deter viable housing production in BelRed.</p>   | <p>Complete. Continued discussion to come on how to further incentivize medical and life sciences in the 116th corridor without further adjustments to base residential FAR.</p>   | Complete           | 2                       |
| 20.20.010    | General Development Requirements | <p>For dimensional standards - Increase the residential base FAR for the West side of 116th from 2.0 to 4.0, citing that many sites on the west side may face reduced economic feasibility, delayed redevelopment timelines, and increased likelihood of underutilization in the near and mid-term with the 2.0 base. Notes that the difference in base FAR between the West and East sides may create unintended and inconsistent urban design outcomes</p>   | <p>Complete. Continued discussion to come on how to further incentivize medical and life sciences in the 116th corridor without further adjustments to base residential FAR.</p>   | Complete           | 2                       |

| Code Section       | Topic                              | Comment(s)  | Response/Notes   | Status   | Comment Tracker Version |
|--------------------|------------------------------------|---|--|--|-------------------------|
| 20.20.420          | General Development Requirements   | For green building, require that the selected certification programs be required to incorporate embodied carbon. Also, requesting that the City must publish, update, or confirm the tiered certification list within 60 days after the LUCA is finalized to ensure there is clarity for the community in a timely manner.  | The Green Building Rule includes a requirement to fulfill one of three pathway options related to embodied carbon to qualify for tier 1. To qualify for tier 2, the project must also fulfill one of two pathway options related to building energy. The potential for additional updates to the Green Building rule will be evaluated along with this project.  | No change proposed   | 2                       |
| 20.20.590          | Parking                            | <p>The parking changes initially proposed for BelRed are positive. We ask for the city to pursue at least a 75% reduction, if not a further reduction, especially in the areas closest to the light rail stop and other frequent transit and in light of expected state mandated parking reforms.</p> <ul style="list-style-type: none"> <li>•Parking adds significant costs to development and sites will provide parking based on site-specific parking analysis regardless of what the city requires. Investors will want a marketable property and will not compromise on parking regardless of the city requirements.</li> </ul> <p>Please allow flexibility with parking and consider removing the requirements altogether so that parking can be reduced in cases where it is supported by a parking study.</p> <p>Consider removing on street parking requirements in cases that it requires significant ROW dedication compared to total site area.</p> <p>Please allow tandem parking to county to meet minimum parking requirements</p> <p>Please consider the size of bike rooms and consider reducing requirements.</p> <p>“Limits on public parking structures” – expand option to allow for stand-alone parking structures to replace other parking requirements, etc.</p> | <p>Off-street parking requirements will be revised significantly through the Minimum Parking LUCA currently underway. This will include removing parking requirements for residential and mixed use development located within one half mile of light rail stations, removing parking requirements for a number of uses including affordable housing, and establishing lower minimums for residential and commercial development in other circumstances.</p> <p>Staff are developing updated language to clarify flexibility for on-street parking requirements.</p> | Off-street parking requirements being updated through separate project. Updates to on-street parking requirements in progress. | 2                       |
| 20.25B.030         | Site Organization and Public Realm | Encourage more pedestrian-oriented design within the first two floors of buildings and emphasize providing trees, streams, and open space (landscape-forward approach).   | New street and access corridor types all include amenity zones which are subject to street tree and landscaping requirements, increasing trees and landscaping in the pedestrian realm. The amenity incentive system also includes incentives for projects to include publicly accessible plazas, daylight and restore streams, and dedicated land for public parks and trails.  | No change proposed   | 2                       |
| 20.25B.040.D.2.b.i | Building Design                    | Include a grade-differential threshold (e.g. where the access corridor 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. For lots that abut Eastrail specifically as an access corridor, 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 location.   | Under review   | Under review   | 2                       |
| 20.25B.050         | Amenity Incentive System           | D. Implement flexibility for phased projects. Allow an early phase to depend on future construction of amenities. This could be very difficult for large, multi-acre projects. Will require disproportionate upfront cost in first phase which will discourage projects or discourage coordinated and more impactful amenity spaces. There could be bonding if amenities are deferred under limited circumstances.  | Staff are developing an option for projects with stream daylighting in later phases to harvest bonus points for earlier phases, but not for other types of amenities.  | Limited changes in progress, language in development   | 2                       |
| 20.25B.050         | Amenity Incentive System           | In general, allow maximum flexibility for amenities. Allow projects to pick any mix of amenities. Do not require projects to pick at least two amenities for the first 75% of bonus.  | The limit only applies to the Arts District Intensive Area, and the options to choose from both make sense as Arts District priorities and are not unreasonable to accommodate. (Ex. That 75% could be achieved by providing affordable housing and a single piece of public art meeting the standards.) In addition, this does not apply to sites daylighting streams or dedicating parks and trails.   | No change proposed   | 2                       |

| Code Section     | Topic                    | Comment(s)   | Response/Notes  | Status   | Comment Tracker Version |
|------------------|--------------------------|--|---|--|-------------------------|
| 20.25B.050.A.3.b | Amenity Incentive System | Large projects need to be phased, and their amenities need to be phased as well, especially when it comes to stream daylighting.   | Staff support allowing early phases to harvest bonus points earned by stream restoration occurring in later phases. Work is ongoing to develop appropriate measures to provide certainty that planned improvements will occur in later phases. Proposed language to come.   | Agree to change, language in development       | 2                       |
| 20.25B.050.C.1   | Amenity Incentive System | Expand the FAR exemption list and include small art galleries, arts-oriented retail, maker spaces, rehearsal rooms, black box theaters, and similar cultural spaces.   | Under the current draft, any of these spaces could be exempt from FAR if designed to meet active use requirements or affordable commercial requirements. Staff are evaluating whether to add additional specificity for certain cultural spaces.  | Under review                                   | 2                       |
| 20.25C.020.C.2.a | Access and Connectivity  | Nonmotorized access requirement to eastrail in 20.25C Wilburton overlay. Allow the director to modify the 350-foot interval of nonmotorized access and approve alternative access configurations where topography makes standard spacing impractical   | This is a Wilburton-specific provision. While Wilburton-specific provisions are being reorganized with this update, the BelRed LUCA scope will not include substantive updates to Wilburton-specific provisions.  | No change proposed                             | 2                       |
| 20.25C.040.B.1   | Green Roof Requirement   | Can early phase exterior areas that future phases build on top of be exempted from the calculation of the required green roof?   | While the green roof requirement is Wilburton-specific, staff are evaluating whether a change may be warranted as a clarification.  | Under review                                   | 2                       |
| 20.25D.020       | Access and Connectivity  | Main concerns: these local streets are not needed from a transportation perspective, so how is staff determining which local streets remain? Why not just use the block size limit to solve this, and quit trying to prescribe street locations? These standards will make it less likely that properties redevelop, not more. | The statement that local streets are not required from a transportation perspective only refers to the system level. The local street grid is required to ensure access is available throughout BelRed as development proceeds, and that individual parcels can develop without creating access issues for their neighbors, among advancing other policy and public access objectives. The public local grid has been reduced to those segments staff recommend as being most important to ensure certainty around access, as well as important east-west Green Street connections. | No change proposed                             | 2                       |
| 20.25D.020       | Access and Connectivity  | Plazas should also be able to function as shared use paths if they meet the minimum standards.   | Amenity Incentive System has provisions for an Enhanced Shared Use Path to also be considered an outdoor plaza when achieving established design standards for outdoor plazas.  | Complete                                       | 2                       |
| 20.25D.020       | Access and Connectivity  | Curb extension plantings really prescriptive, but the code doesn't say where it's required.  | Entire section is outdated and has been removed. Planting requirements to be driven by TDM, landscaping requirements, and forthcoming Director's Rule on planting species.  | Complete                                       | 2                       |
| 20.25D.020       | Access and Connectivity  | West side of Eastrail has a lot of potential if the City provides connection to it. No provisions to require or incentivize developers to include access points to Eastrail, can draw on existing language from WB   | Amenity incentive system provides for bonus points in exchange for trail access. Reference to Eastrail access has been added for clarity.   | Complete                                       | 2                       |
| 20.25D.020       | Access and Connectivity  | Intersection concerns should be handled via design rules, not in prescribed locations. Safe intersection can be achieved without full street alignments by enforcing Right-In/Right-Out (RIRO) vehicular access and establishing minimum curb-cut spacing from arterials.  | Language has been softened around intersection alignments. Transportation will consider adjustments to intersection layouts through the development review process, however applicant must work with the city to analyze and resolve potential impacts.   | Complete                                       | 2                       |
| 20.25D.020       | Access and Connectivity  | Eliminate the need for on-street parking along some portions of streets to enhance the pedestrian experience. How will specific design elements be negotiated with transportation?   | On street parking is now limited to only being required with local streets and green streets. Language in the draft also provides for flexibility on street parking. Further revisions are in progress to clarify when flexibility is available.  | Initial update complete, improvements underway | 2                       |
| 20.25D.020       | Access and Connectivity  | Instead of prescriptive street grid standards, include design standard to prohibit the creation of trapped parcels. If a development creates a trapped parcel, resolve through standard Cross-Access Easements and Shared Access Easements, instead of mandating costly roads.   | While possible, requiring the reduced grid provides greater certainty. Dedicated public streets also provide more consistent outcomes for future road maintenance and public access, among other benefits. It is difficult to anticipate and resolve all potential access conflicts through easements across the district.  | No change proposed                             | 2                       |
| 20.25D.020.B     | Access and Connectivity  | Support the replacement of the street grid network with a block perimeter performance-based standard w/contractual guardrails such as access easement, operational agreements, and staff approvals to ensure public access, uphold ongoing maintenance, and avoid island parcels from being created                            | No change proposed  | No change proposed                             | 2                       |
| 20.25D.020.B     | Access and Connectivity  | 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   | No change proposed  | No change proposed                             | 2                       |

| Code Section                                      | Topic                              | Comment(s)  | Response/Notes  | Status                            | Comment Tracker Version |
|---|------------------------------------|---|---|-----------------------------------|-------------------------|
| 20.25D.020.B                                      | Access and Connectivity            | Remove the local street grid requirement and allow more flexibility for pedestrian-focused creativity flow site-to-site. If local streets are required to be built reward developers with points in the amenity incentive system, a tax break, or other improvements to incentivize building the streets.   | No change proposed to street grid requirement, evaluating options to build considerations into amenity incentive system or other mechanism.   | Limited changes under review      | 2                       |
| 20.25D.020.B                                      | Access and Connectivity            | Update the map to show the updated green street location they're working on through the MDP location  | Revised map had been prepared before MDP was submitted. Green street segment will be updated in a future version, though the location shown on the map would not overrule the location reviewed through the MDP.  | To be implemented in future draft | 2                       |
| 20.25D.020.B.1                                    | Access and Connectivity            | <p>Concerned about the EW required local street segments that runs through the Alberton's site, North of NE Spring Blvd and would like this section removed from the map.</p> <p>The local street requirement is "incompatible with site conditions, topography, and impedes future development plans."</p> <p>"requiring the grid would create an unwanted burden on the property without providing commensurate public benefit" - since the parcel is private single-ownership the street would break up the campus.</p> <p>Topographical challenges including significant retaining wall and grade considerations. "As contemplated, this road segment would be a canyon into the site"</p> <p>Instead they intend to include ped/bike connections and open space through the site rather than the local street.</p> | Current draft provides for this segment to be moved, or replaced with a private segment, through the development review process. The remainder of the site can be divided with ped/bike connections. Evaluating an option for large sites with local streets to pursue a development agreement as alternate path for flexibility.   | Limited changes under review      | 2                       |
| 20.25D.020.B.3                                    | Access and Connectivity            | Include flexibility when implementing the grid to meander or alter the segment as long as the master plan satisfies the block size and connectivity goals   | Flexibility to meander required segmenet and potentially move intersection is possible through the development process, under proposed language updates in draft.   | No change proposed                | 2                       |
| 20.25D.020.B.3                                    | Access and Connectivity            | Update the map to remove segments where the street grid would be undevelopable due to physical restraints (grade, parcel dimensions, utility conflicts). Specifically for the Timber and Partners site (NE Spring St & 132ND AVE NE) they explain the local street requirement impacts their vision for a continuous pedestrian street lined with arts uses and affordable commercial tenants, reduces the development capacity to provide affordable units, would disrupt the pedestrian plaza by having vehicular traffic adjacent to the arts plaza, and increases traffic connection onto Spring (finishing the interim street that Ondina started).  | Draft includes option to replace defined local street segments with pedestrian streets, subject to certain criteria.  | Complete                          | 2                       |
| 20.25D.020.C.1.<br>20.25D.020.C.6<br>20.25D.040.B | Access and Connectivity            | Exclude the portion south of NE 12th that is no longer in Bel-Red.  | To be resolved in final maps.   | In Progress                       | 2                       |
| 20.25D.030.B                                      | Site Organization and Public Realm | Limit scope/applicability of active uses. These prescriptive standards are often at the direct (or passed along) cost of housing. BelRed is an evolving neighborhood, and vacant retail space will not be good for the neighborhood.  | Currently, ground floor retail is required along 130th between Northup and Spring, and ground floor commercial is required in block immediately surrounding Spring District and BelRed stations. We're maintaining that limited footprint, and expanding to apply Citywide definition of "active use" as ground floor use requirement in these areas, rather than restricting to retail or commercial. Citywide active use definition provides great flexibility, including providing for residential lobbies, etc. | Complete                          | 2                       |
| 20.25D.030.C                                      | Site Organization and Public Realm | 20' landscape buffer required south of BelRed Road between 124th and 148th where a site abuts a Residential Land Use District. 20' landscape buffer feels excessive. This section mentions retention of significant trees, but those provisions no longer apply in BelRed.  | No change proposed  | No change proposed                | 2                       |

| Code Section | Topic                    | Comment(s)  | Response/Notes   | Status             | Comment Tracker Version |
|--------------|--------------------------|---|--|--------------------|-------------------------|
| 20.25D.050   | Amenity Incentive System | Remove the district-specific bonuses in the amenity incentive system and instead use a single uniform amenity menu applicable to all sites in BelRed with a single set of bonus point values for each amenity (similar to WB structure).  | AIS has been simplified to have one value for each amenity, with applicable percentage bonuses available in certain circumstances.   | Complete           | 2                       |
| 20.25D.050   | Amenity Incentive System | Add the following items to the list of eligible amenities:<br><ul style="list-style-type: none"> <li>- Publicly available sporting facilities (indoor athletic county's, pools, fitness facilities, etc. that are open to the public)</li> <li>- Fee-in-lieu to support the arts district</li> <li>- Childcare, early learning, and schools on site (align w/WB approach - eight bonus points for every one sf of child care service, up to a max on 15,000 sf, including outdoor areas dedicated exclusively for use by the child care service)</li> <li>- Grocery stores and daily-needs retail</li> <li>- Amphitheaters and performance venues (purpose-built outdoor or indoor performance venues that standalone from performance spaces included in outdoor plazas... "serve as iconic neighborhood landmarks")</li> <li>- Critical area improvements, including removing invasive species removal on steep slopes (include broader a broader category for critical area improvements for enhancement activities beyond stream restoration alone, specifically invasive species removal on slopes)</li> <li>- Family-sized housing (align w/WB approach - dwelling units with three or more bedrooms earn one bonus point for every on sf of the dwelling unit)</li> <li>- Access and connectivity</li> </ul> | Fee-in-lieu for arts district to be provided in future draft, additional credit for street network under review. Evaluating additional amenities to support arts district.   | Under review       | 2                       |
| 20.25D.050   | Amenity Incentive System | Include TDR in the amenity incentive system and renew a TDR partnership with King County  | TDR included in amenity incentive system. City plans to renew TDR partnership.   | In Progress        | 2                       |
| 20.25D.050   | Amenity Incentive System | Include a residential catalyst program similar to Wilburton with a menu of incentive options, beyond just density, calibrated at the true cost of delivering key community amenities (affordable housing, public arts, public plazas, etc.) Explains that the density itself will not be a significant enough incentive to reflect the real costs associated with implementing the LUCA as proposed.  |  | Under review       | 2                       |
| 20.25D.050   | Amenity Incentive System | The current amenity incentive system is not clear about how the system relates to the mandatory affordable housing requirements.  | The design criteria state that "while all affordable housing is exempt for the purpose of calculating FAR, affordable housing bonus FAR may be earned only for affordable housing provided in excess of the amount required by LUC 20.15.110". We will consider additional opportunities to clarify. | No change proposed | 2                       |
| 20.25D.050   | Amenity Incentive System | C.2.c.i. Sites daylighting re-meandering or restoring a stream, dedicating parks, or dedicating trails identified in the BelRed Subarea Plan (Figure S-BR-1) may utilize any combination of amenities from the standard list to earn bonus FAR.   | This is the approach in the draft.   | No change proposed | 2                       |
| 20.25D.050   | Amenity Incentive System | Allow alternative incentives (other than just density bonuses) for projects delivering significant community amenities.<br>Where a project provides substantial district-level infrastructure or cultural amenities, the Director should be able to grant credits against required fees or other City participation proportional to the value of those benefits. This helps ensure that early catalytic projects are not disproportionately burdened with the cost of infrastructure that benefits the entire district.   | Based on the information provided, it's unclear what kind of exceptional public benefit would be provided in exchange for additional incentives. As it is, base FAR has also increased significantly.  | No change proposed | 2                       |

| Code Section   | Topic                    | Comment(s)   | Response/Notes   | Status   | Comment Tracker Version |
|----------------|--------------------------|--|--|--|-------------------------|
| 20.25D.050.B   | Amenity Incentive System | What is the definition of affordable commercial and what criteria is used to ensure that a use meets this definition? Is this defined by rent levels? Please clarify. Is there a way for the city to administer affordable commercial space?   | Affordable Commercial Director's Rule establishes criteria for tenants to qualify for Affordable Commercial spaces, and limits on rents for qualified tenants. Bellevue Economic Development will administer the program, and confirm that tenants selected by property owner are qualify and that rent levels are consistent with program requirements.   | No change proposed   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Offer deeper incentives for lower AMI affordable housing units to ensure a feasible mix of AMI levels in the neighborhood  | The proposal will apply the same incentive structure introduced with Wilburton, which incentivizes providing lower income units by setting lower percentages at the 60% and 50% AMI levels.  | No change proposed   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Support a fee-in-lieu schedule for the AIS that is predictable, flexible, and centers affordable housing. For fee allocation, support for 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.                | All MHA fees-in-lieu will be dedicated to affordable housing. The fee-in-lieu associated with the AIS is completely separate. A set portion of all fees-in-lieu provided to earn bonus points through the AIS will be dedicated to affordable housing. This means that the proposal will provide two dedicated revenue streams for affordable housing: one through MHA, which will be provided at a consistent level for every project, and a separate one through a share of AIS fees-in-lieu. Projects will have the ability to choose between providing amenities on site or earning bonus points through fees-in-lieu, or a mix, and can choose their level of participation in the AIS. | Agree to change, language in development                                   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Support a reasonable maximum percentage cap on the amount of fee-in-lieu that can be paid per project  | Staff are recommending no restriction on the use of fees-in-lieu to earn AIS bonus points.   | In Progress  | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Consider vesting fees for fee-in-lieu at land use approval. This creates consistency with other parts of the code and helps create predictability for project financing  | No change proposed   | No change proposed   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Support for removing the rigid tier system so that developers have flexibility to focus on amenities that make the most sense for the site. Support the approach that uses a set max height and then solely offers FAR as a bonus, decreases the complexity. Support affordable housing included in the priority amenities for the arts district intensive area. | Consistent with staff proposal.  | No change proposed   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Reform the incentive structure to accurately reflect required project costs (i.e. stream restoration) and to prioritize the outcomes the city most wants to achieve (arts spaces, parks, and public-oriented uses).  | Stream restoration bonus points are provided as a function of the total project cost spent on that amenity. We welcome feedback on the exchange rate.  | No change proposed   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Consider a catalyst program that directly offsets the costs of the most difficult to achieve the desired outcomes  | Under Review   | Under review   | 2                       |
| 20.25D.050.C   | Amenity Incentive System | Make affordable housing a required amenity in the arts district intensive area, not just one item in a menu  | Affordable housing is already mandatory throughout BelRed, so regardless of whether it is selected as one of the amenity options, there will always be affordable housing provision.   | No change proposed   | 2                       |
| 20.25D.050.C.5 | Amenity Incentive System | For stream restoration, include stream restoration as well as stream daylighting to better align with the CAO  | Language has been updated to expand the types of projects that are eligible for the stream restoration bonus. Further amendments are under development to establish a performance-based threshold for eligibility, rather than needing to differentiate by project type or discern whether a project is exceeding CAO requirements.  | Partially complete, further updates planned before September study session | 2                       |
| 20.25D.050.C.5 | Amenity Incentive System | Stream daylighting needs an appropriately sized incentive to offset the costs associated with the work   | Updated language will provide an incentive for the full cost of stream daylighting. We welcome feedback on the exchange rate, including any additional detail on estimated stream daylighting costs for testing. Further amendments in development to improve ease of applicability for this amenity.  | Partially complete, further updates planned before September study session | 2                       |
| 20.25D.050.C.9 | Amenity Incentive System | Allow deferred green factor compliance for phased projects with an approved MDP  | No change proposed   | No change proposed   | 2                       |

| Code Section | Topic            | Comment(s)  | Response/Notes   | Status             | Comment Tracker Version |
|--------------|------------------|---|--|--------------------|-------------------------|
| 20.25D.060   | Design Standards | <p>Wilburton moved away from design standards, why not do the same in BelRed? How will staff treat these guidelines? For instance, what does it mean that a “design should incorporate open space amenities”? These feel very subjective.</p> <p>The word “Director” appears in this draft over 60 times. We need to continue to strike the balance between flexibility and predictability.</p> <p>The design guidelines appear to include a lot of overreach—for example, we have to provide “durable hardware for residential doors?”</p>   | <p>Design standards differentiate between mandatory, objective standards, and recommended guidelines. Staff are continuing to revise and work through guidelines and standards to remove unnecessary provisions. We remain open to additional specific suggestions on how to balance predictability and flexibility.</p> | In Progress        | 2                       |
| 20.25D.060   | Design Standards | <p>We ask that Affordable Housing be exempt from Design Review requirements while still providing options for administrative departures. We also ask that projects complying with onsite performance of the affordable housing requirement be exempt from Design Review.</p>  | <p>Bellevue's Design Review process is administrative, and does not require burdensome public processes. As all administrative departures are considered through the design review process, it's not currently feasible to consider administrative departures separately.</p>  | No change proposed | 2                       |
| 20.25D.060   | Design Standards | <p>Other comments on Design Guidelines from BelRed draft code include:</p> <p>20.25D.060.B.2.b.i “Forms, proportions, materials, colors, and architectural design shall complement adjacent buildings.”</p> <ul style="list-style-type: none"> <li>•For a 100% affordable LIHTC building this expectation can cause excessive costs and create cost inefficiencies. If a LIHTC project is constructed next to a Class A tower is the expectation that the LIHTC building be a tower and use Class A materials? Or what if a 6-story building is built first, are all the other buildings to be built around it to match a 6-story form?</li> </ul> <p>20.25D.060.B.3.b.i “Use signage, landscaping, lighting, sculpture, markers, or inlaid art treatment in sidewalk paving, or artistic elements to identify a gateway.”</p> <ul style="list-style-type: none"> <li>•100% affordable LIHTC projects should be exempt, it adds costs.</li> </ul> <p>20.25D.060.B.5.a “Intent. Large-scale art in both public and private applications should bring focus to an outdoor space while small-scale pieces should bring detail to the pedestrian realm surrounding a building or site.”</p> <ul style="list-style-type: none"> <li>•If this is optional then it should state optional and not use the word “should”. 100% affordable LIHTC projects should be exempt.</li> </ul> <p>20.25D.060.C.2.b.iv “Provide mid-block pedestrian connections.”</p> <ul style="list-style-type: none"> <li>•Define minimum length of block where a mid-block connection is necessary. Mid-block connections on smaller blocks are too onerous.</li> </ul> <p>20.25D.060.C.4 “Outdoor Spaces.”</p> <ul style="list-style-type: none"> <li>•Are outdoor spaces open to unrestricted public access? Or is the intent to have public spaces in addition to private outdoor amenity spaces?</li> </ul> | <p>All design guidelines are being reviewed and revised, additional changes likely before next draft.</p>  | In Progress        | 2                       |
| 20.30V.190   | Vesting          | <p>Minimum 10 year vesting period is needed. They need to rely on the approvals associated with the MDP for future investment purposes. Need certainty for lenders and investors</p>  | <p>Revisiting vesting for all MDPs is not part of the scope of this LUCA.</p>  | No change proposed | 2                       |