

## Nesse, Katherine

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**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

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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.**

999 Third Avenue | Suite 4600 | Seattle, WA 98104

d: **206.470.7656** | 206.623.1745 | f: 206.623.7789

holly.golden@hcmp.com | [www.hcmp.com](http://www.hcmp.com) | vCard | view my bio

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May 22, 2026

*Via Email ([planningcommission@bellevuewa.gov](mailto: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,

A handwritten signature in black ink that reads "Holly D. Golden". The signature is written in a cursive, flowing style.

Holly D. Golden

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

## Nesse, Katherine

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**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

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**[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](mailto: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  
450 110<sup>th</sup> 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

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**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

**Follow Up Flag:** Follow up  
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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

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**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

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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

layla.khademi@hcmp.com | [www.hcmp.com](http://www.hcmp.com)

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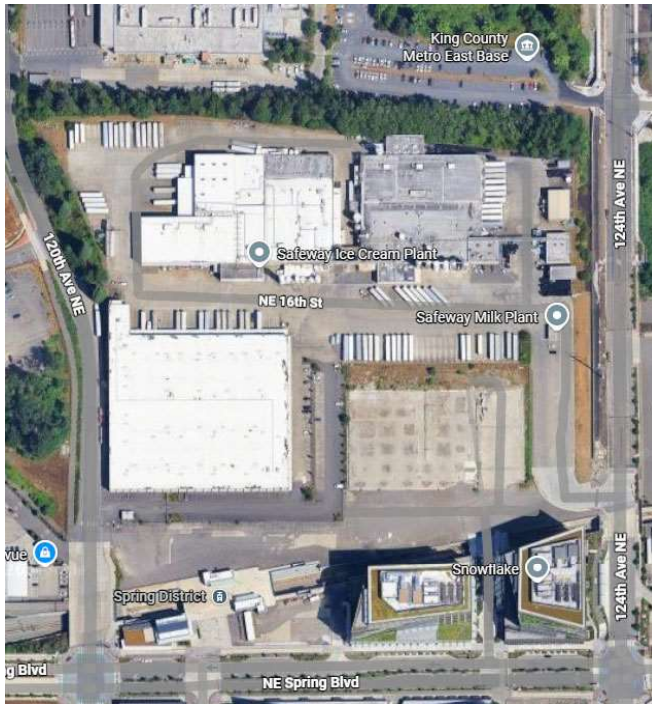
May 22, 2026

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 22<sup>nd</sup> 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

STUDIO  
GREGORY  
FAJA

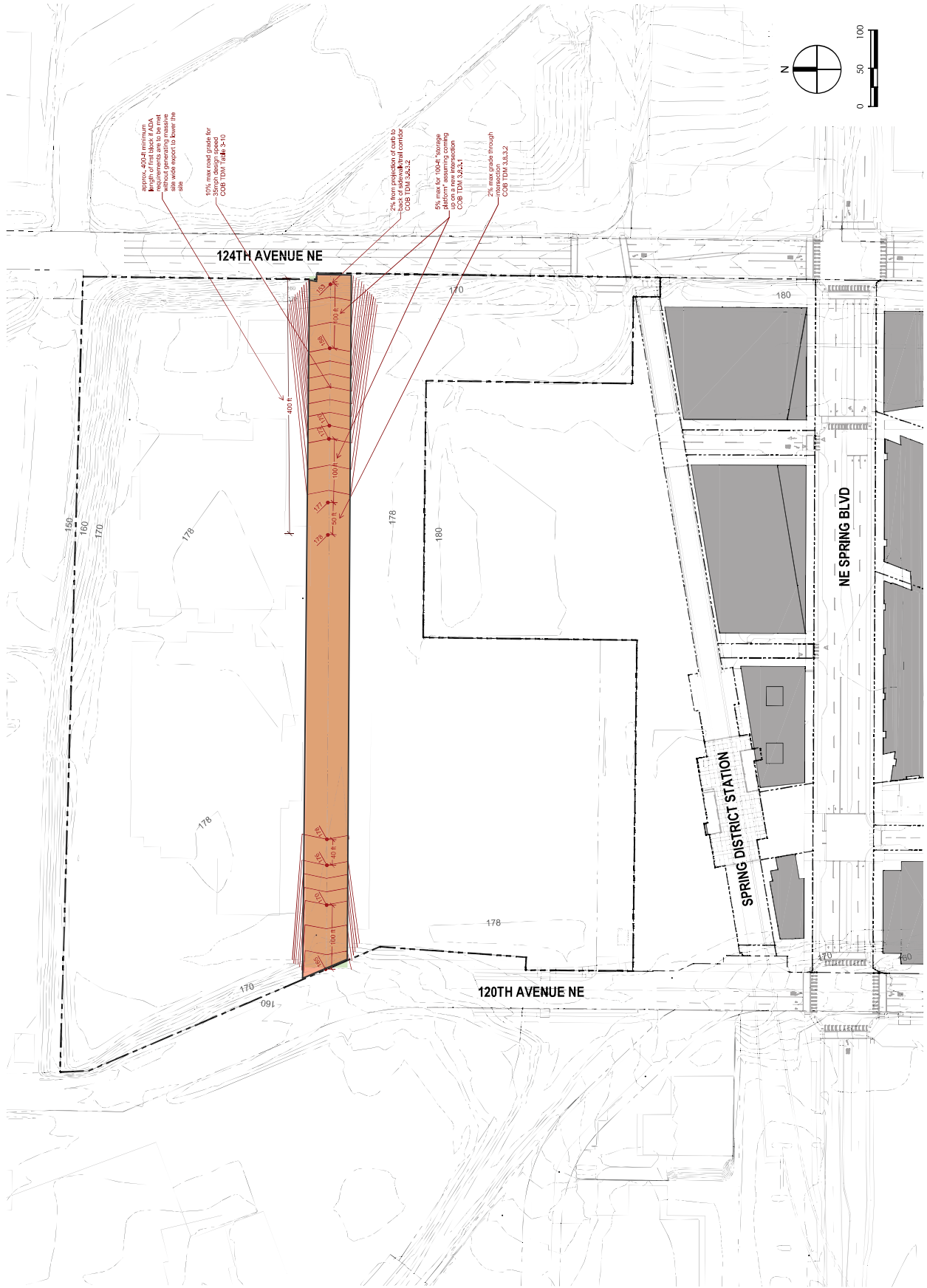
ALBERTSONS  
SPRING DISTRICT

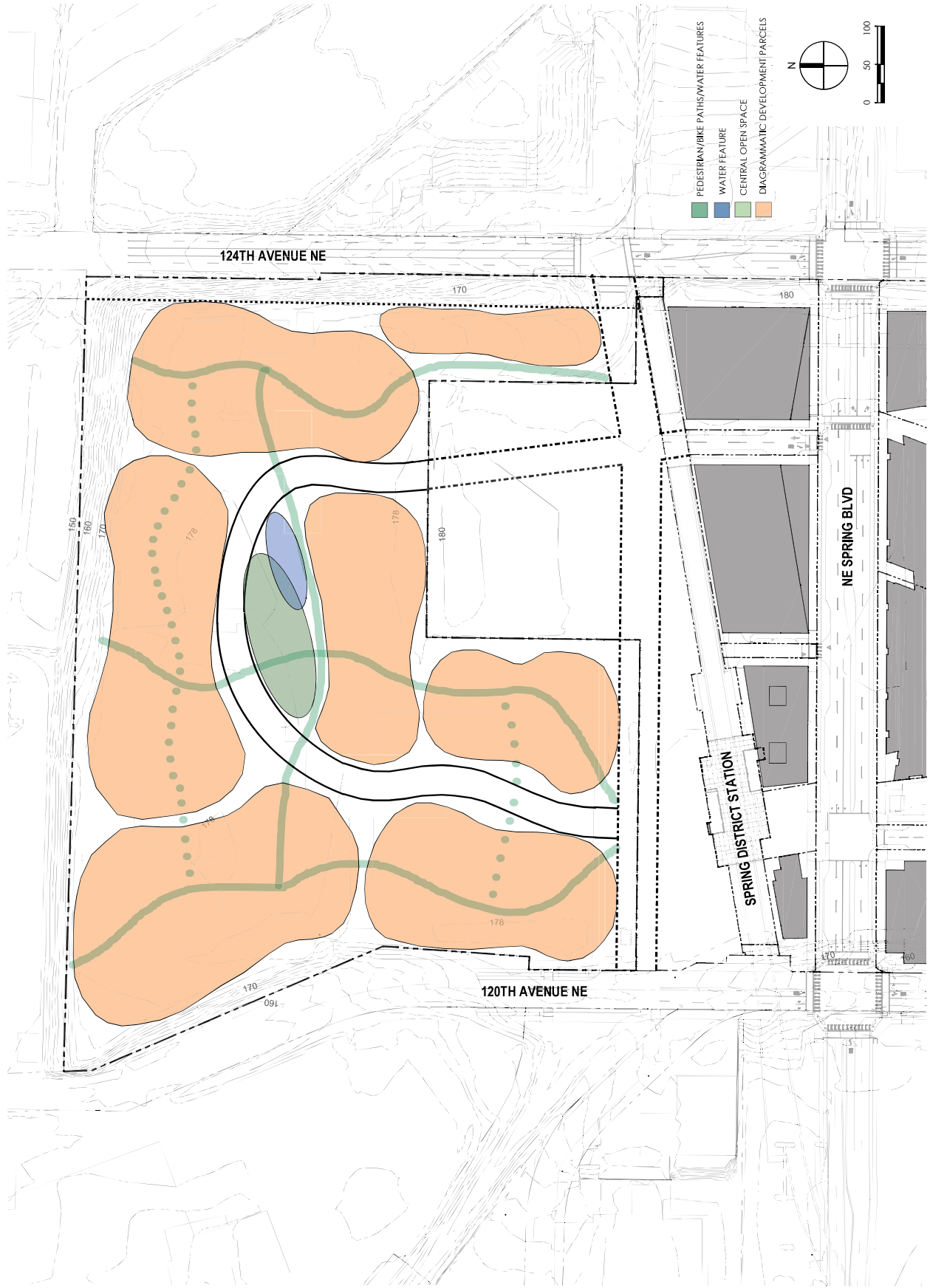
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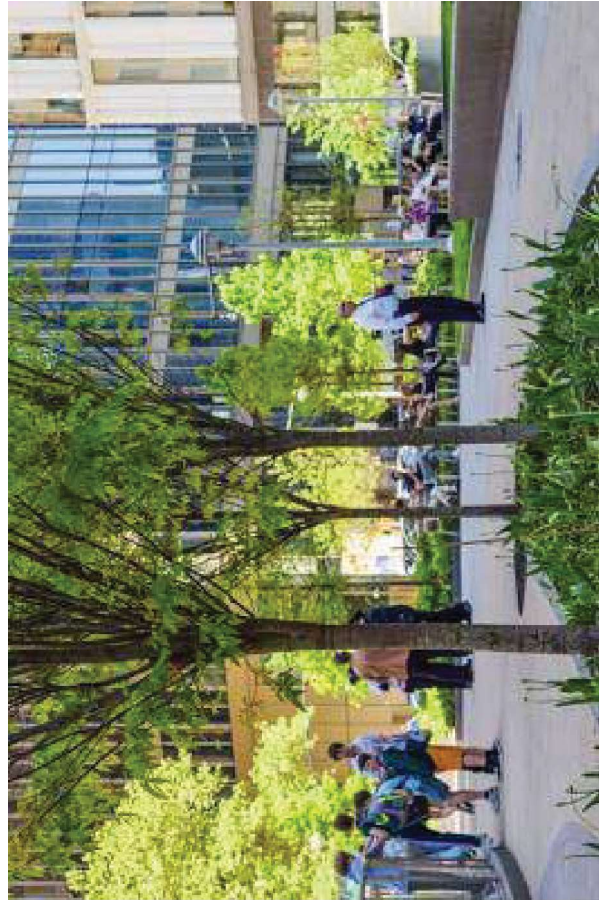
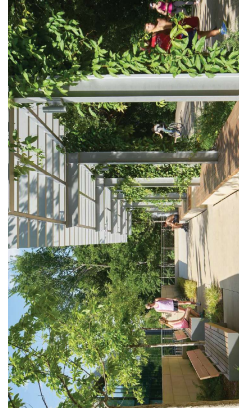
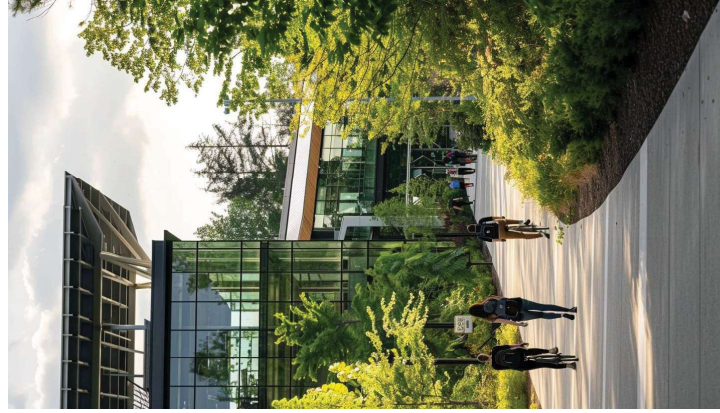
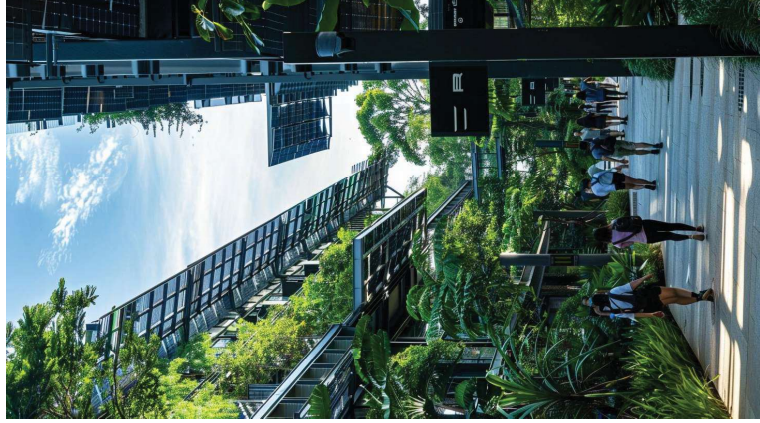
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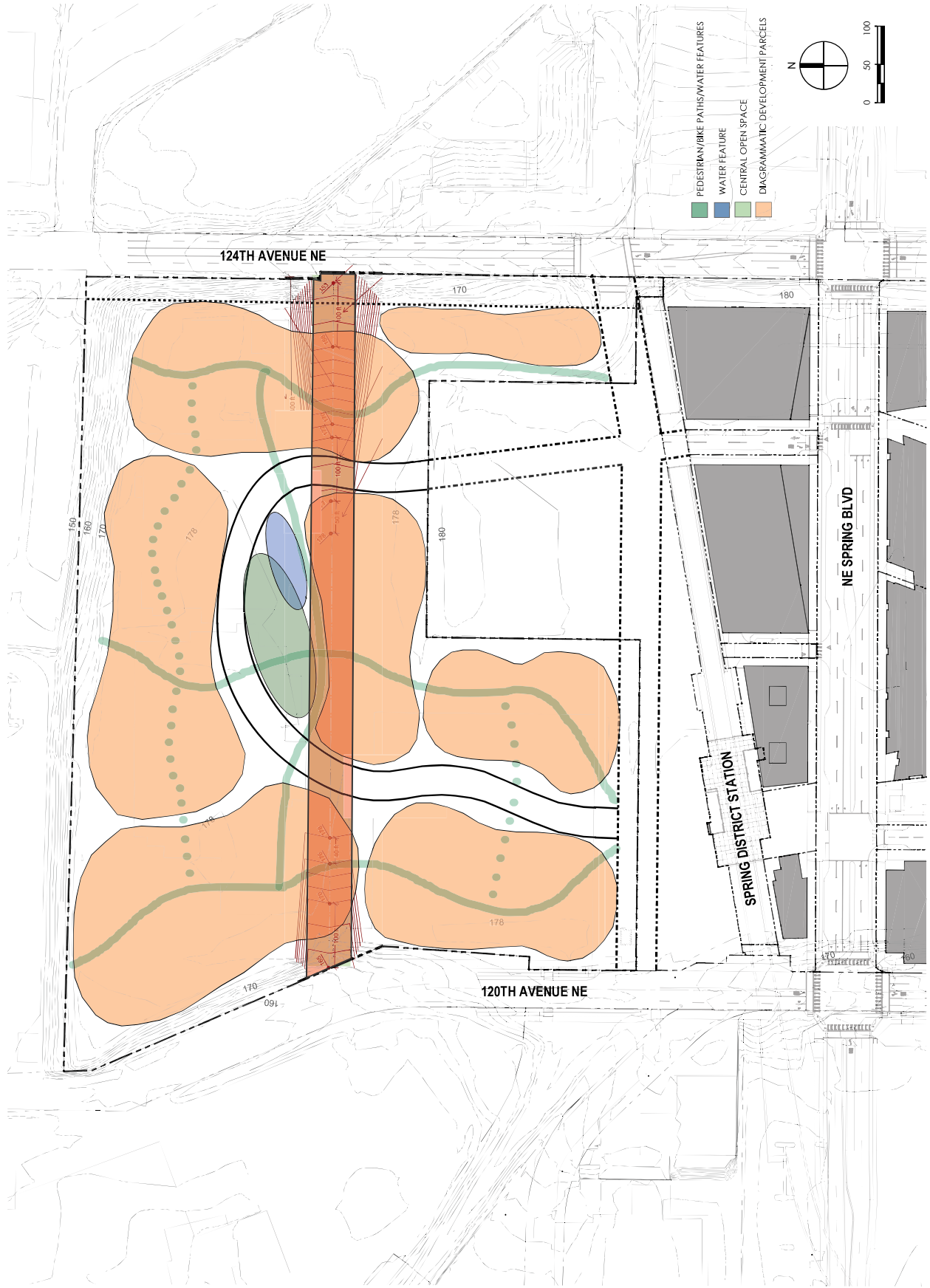
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CAMPUS SHEET 026\_024\_01











## Nesse, Katherine

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**From:** Diana Leo <diana@bellevuechamber.org>  
**Sent:** Tuesday, May 26, 2026 7:58 PM  
**To:** Khanloo, Negin; Lu, Jonny; Villaveces, Andres; Ferris,Carolynn; Goeppele, 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](mailto:diana@bellevuechamber.org)  
330 112<sup>th</sup> 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

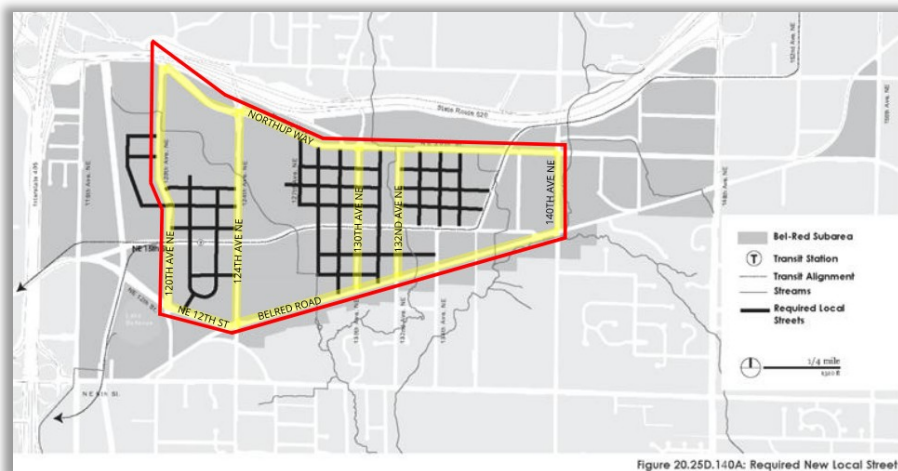
The study area is located in the center of the BelRed subarea and focuses on the location of the street grid that is currently shown in the Bel-Red LUC (Figure 20.25D.140A). The study area is depicted below and consists of the following seven (7) roadway segments:

East-West Arterials:

- BelRed Road between 120<sup>th</sup> Ave NE and 140<sup>th</sup> Ave NE
- Northup Way between 120<sup>th</sup> Ave NE and 140<sup>th</sup> Ave NE

North-South Arterials:

- 120<sup>th</sup> Ave NE between BelRed Road and Northup Way
- 124<sup>th</sup> Ave NE between BelRed Road and Northup Way
- 130<sup>th</sup> Ave NE between BelRed Road and Northup Way
- 132<sup>nd</sup> Ave NE between BelRed Road and Northup Way
- 140<sup>th</sup> 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 124<sup>th</sup> Avenue NE from NE 12<sup>th</sup> Street (BelRed Road) to NE Spring Boulevard.
- TFP-215: This project includes a new arterial roadway connection (NE Spring Blvd) between 130<sup>th</sup> and 132<sup>nd</sup> Avenue NE.
- TFP-218: This project includes multimodal improvements along 130<sup>th</sup> Avenue NE between NE 20<sup>th</sup> Street and NE BelRed Road.
- TFP-265: This project includes roadway and pedestrian improvements along 124<sup>th</sup> Avenue NE between Ichigo Way (NE 18<sup>th</sup> Street) to Northup Way.
- TFP-260: This project includes the widening of 120<sup>th</sup> Avenue NE between NE 16<sup>th</sup> 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 124<sup>th</sup> Ave NE and 130<sup>th</sup> 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), 6<sup>th</sup> 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 travels 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. Travels speeds are between 30% and 40% of the base free-flow speed, and a volume-capacity ratio is no greater than 1.0.

**LOF 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
<u>East-West Arterials</u>		
BelRed Road	E	D
Northup Way	E	D
<u>North-South Arterials</u>		
120 <sup>th</sup> Ave NE	C	C
124 <sup>th</sup> Ave NE	D	C
130 <sup>th</sup> Ave NE	E	D
132 <sup>nd</sup> Ave NE	E	D
140 <sup>th</sup> 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 124<sup>th</sup> Ave NE and 130<sup>th</sup> 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.

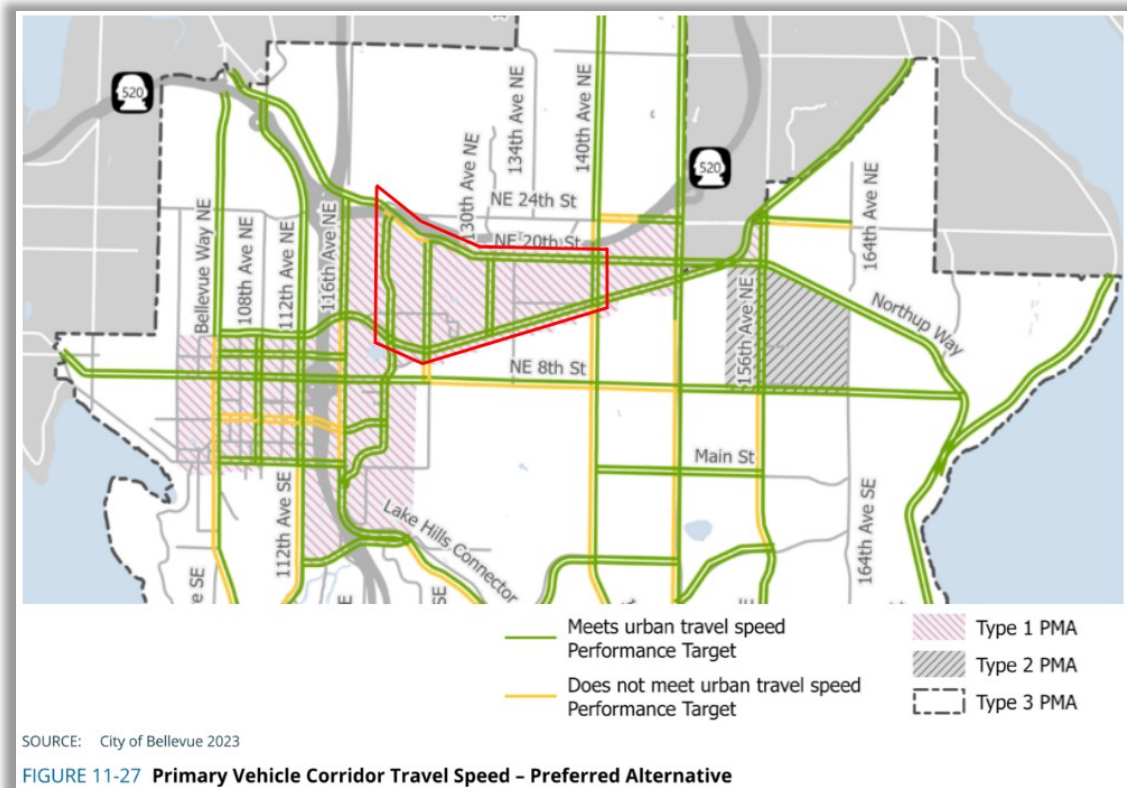
**Table 3**  
**Vehicle Corridor Travel Speed Performance**  
**from the 2024-2044 Comprehensive Plan FEIS**

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

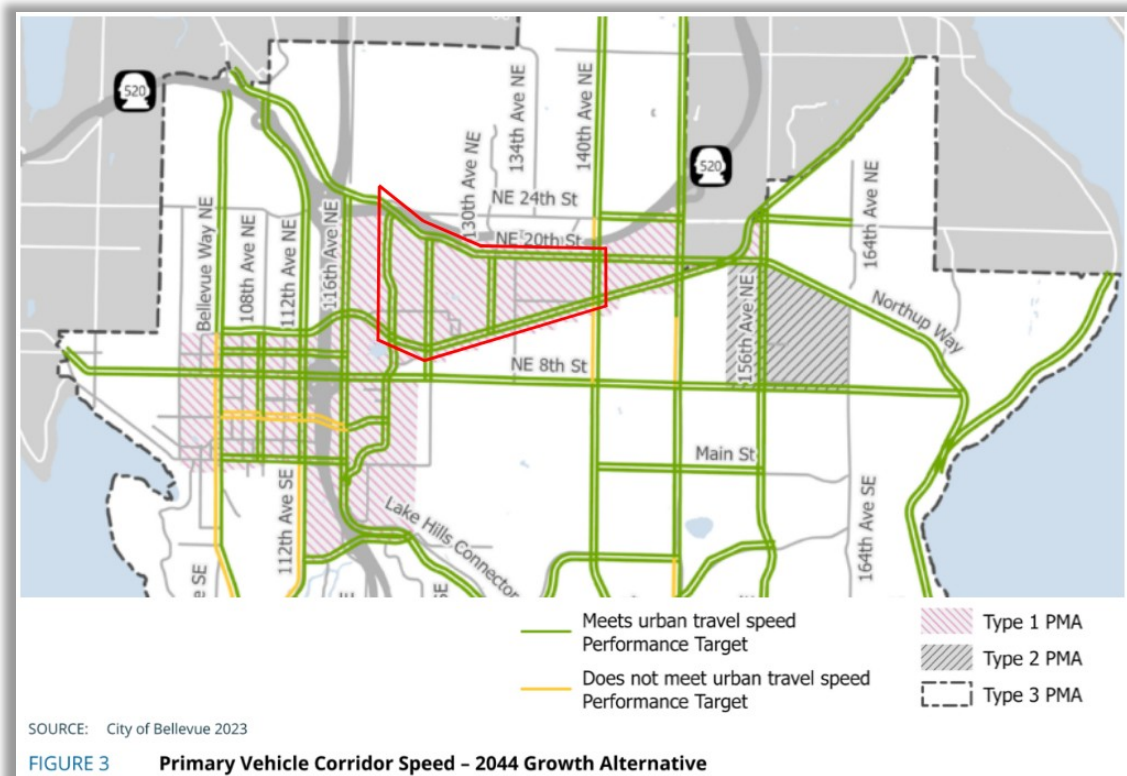
1. Met with the exception of Northup Way between 120<sup>th</sup> Ave NE and 124<sup>th</sup> Ave NE in the Eastbound direction.

2. 132<sup>nd</sup> 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 120<sup>th</sup> Ave NE and 124<sup>th</sup> 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 124<sup>th</sup> Ave NE and 130<sup>th</sup> 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 124<sup>th</sup> Ave NE and 130<sup>th</sup> 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.

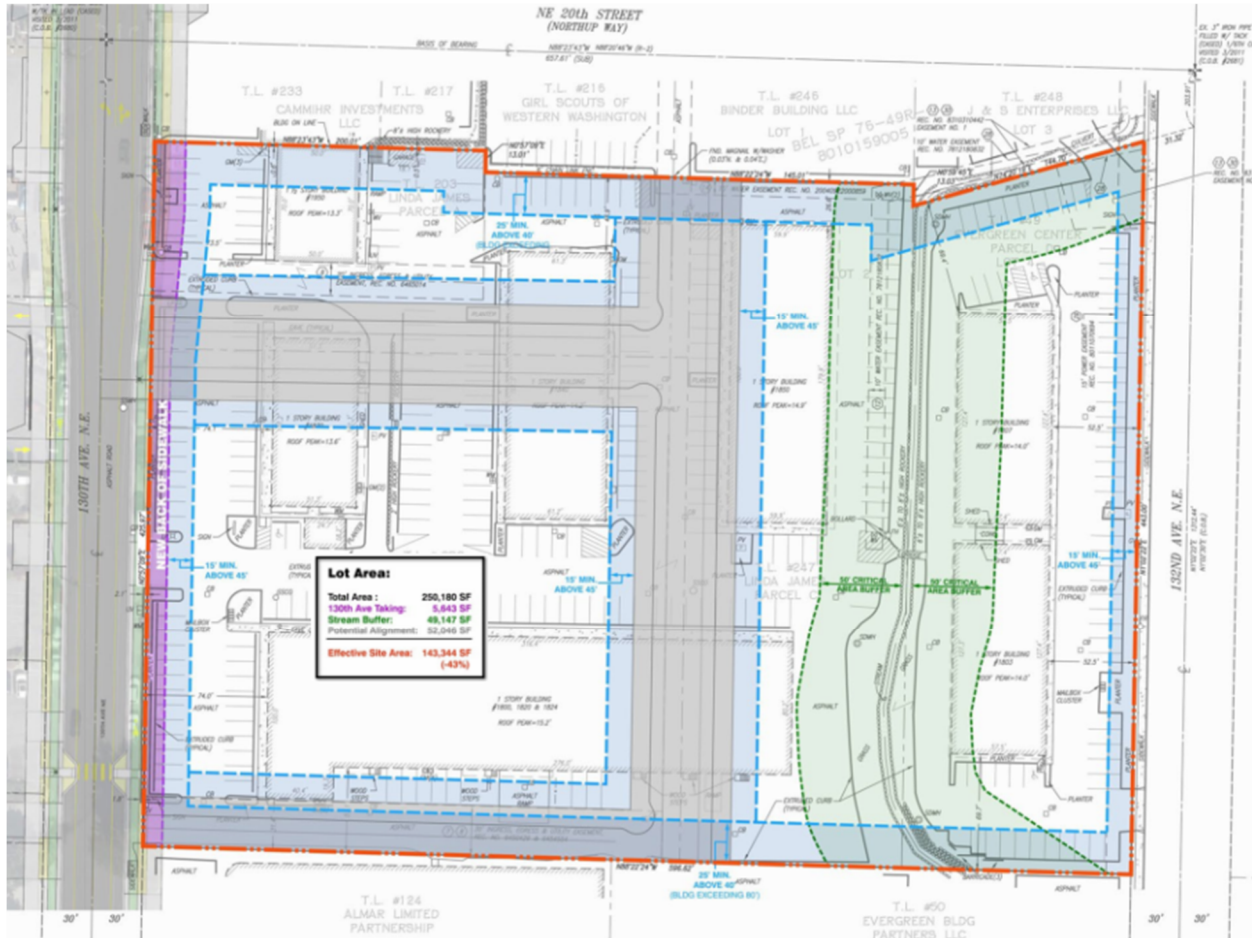
## Other Street Grid Constraints

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 130<sup>th</sup> 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 130<sup>th</sup> 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 124<sup>th</sup> Ave NE north of Spring Blvd. The roadway grid depicted in the current LUC shows multiple new local access streets connecting to 124<sup>th</sup> 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](mailto: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

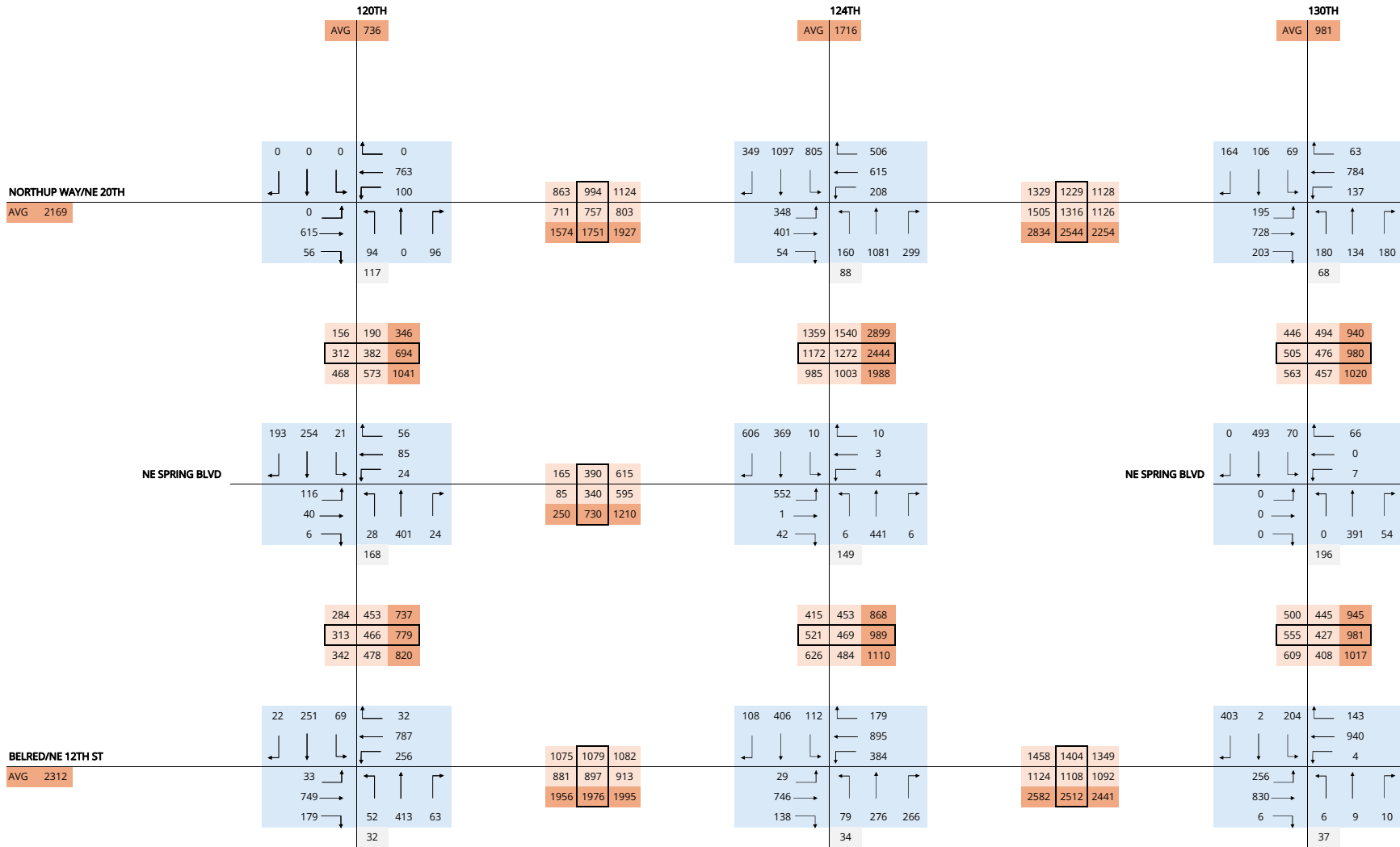
2044 Preferred Alternative

Area 1b BelRed

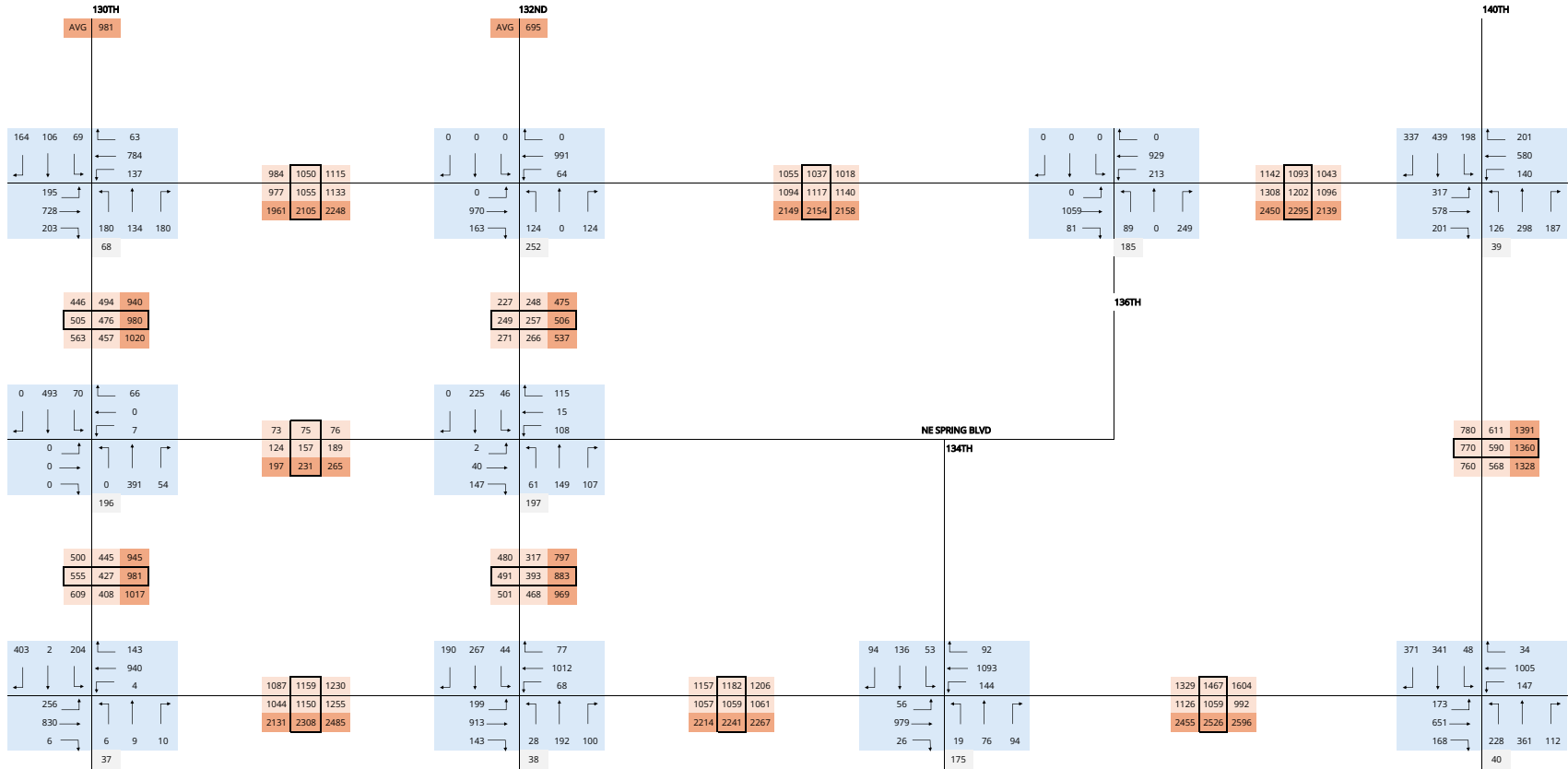
Int	NS Street	EW Street	NB			SB			EB			WB		
			LT	TH	RT	LT	TH	RT	LT	TH	RT	LT	TH	RT
29	116th Ave NE	NE 12th St	80	1233	617	544	1861	271	565	1061	102	418	1987	257
32	120th Ave NE	NE 12th St	34	542	32	140	429	58	136	1196	241	235	1121	90
34	124th Ave NE	Bel-Red Rd	125	619	383	180	592	190	66	1091	184	406	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

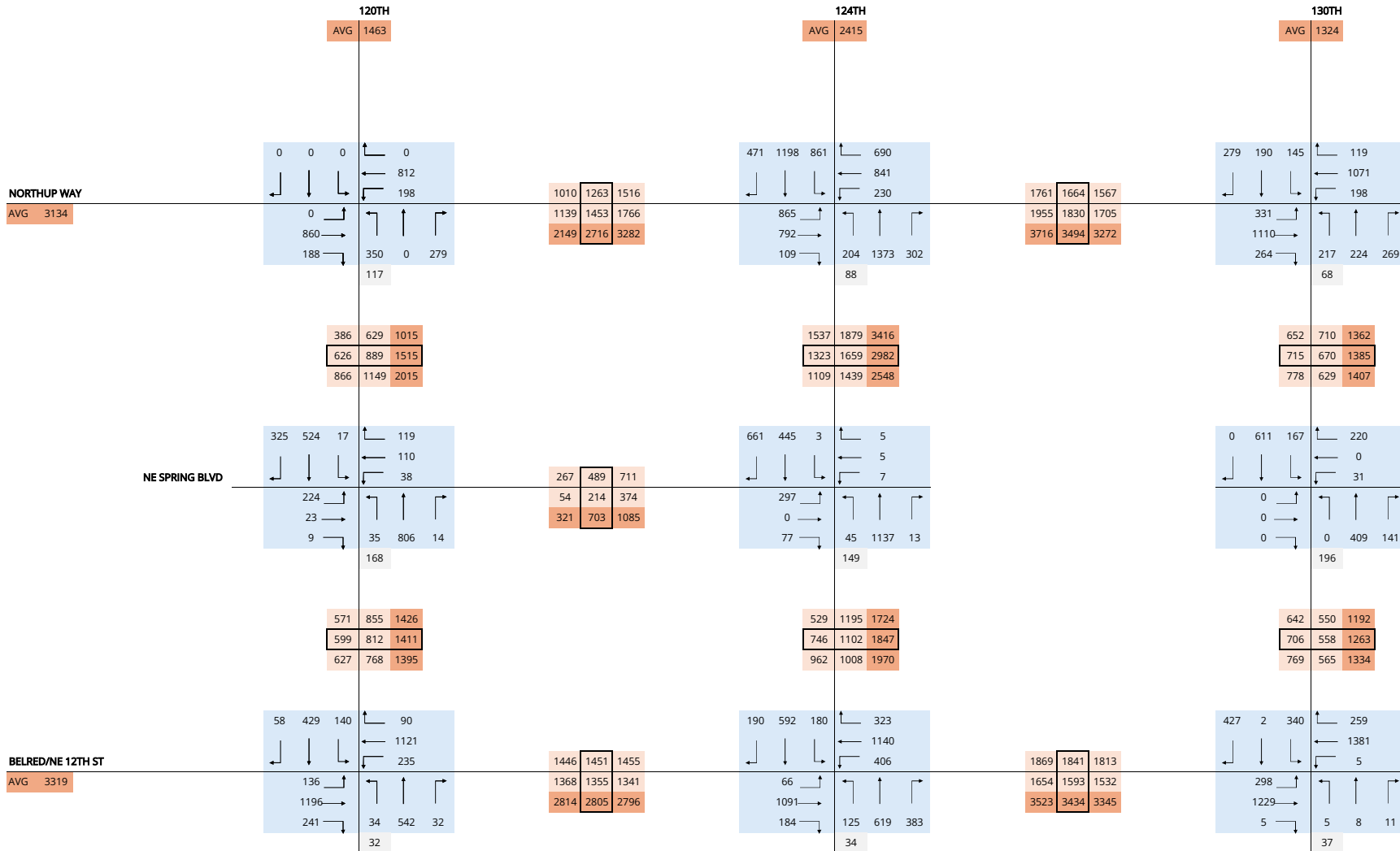
2044 Preferred Growth Alternative (120th Ave NE - 130th Ave NE)



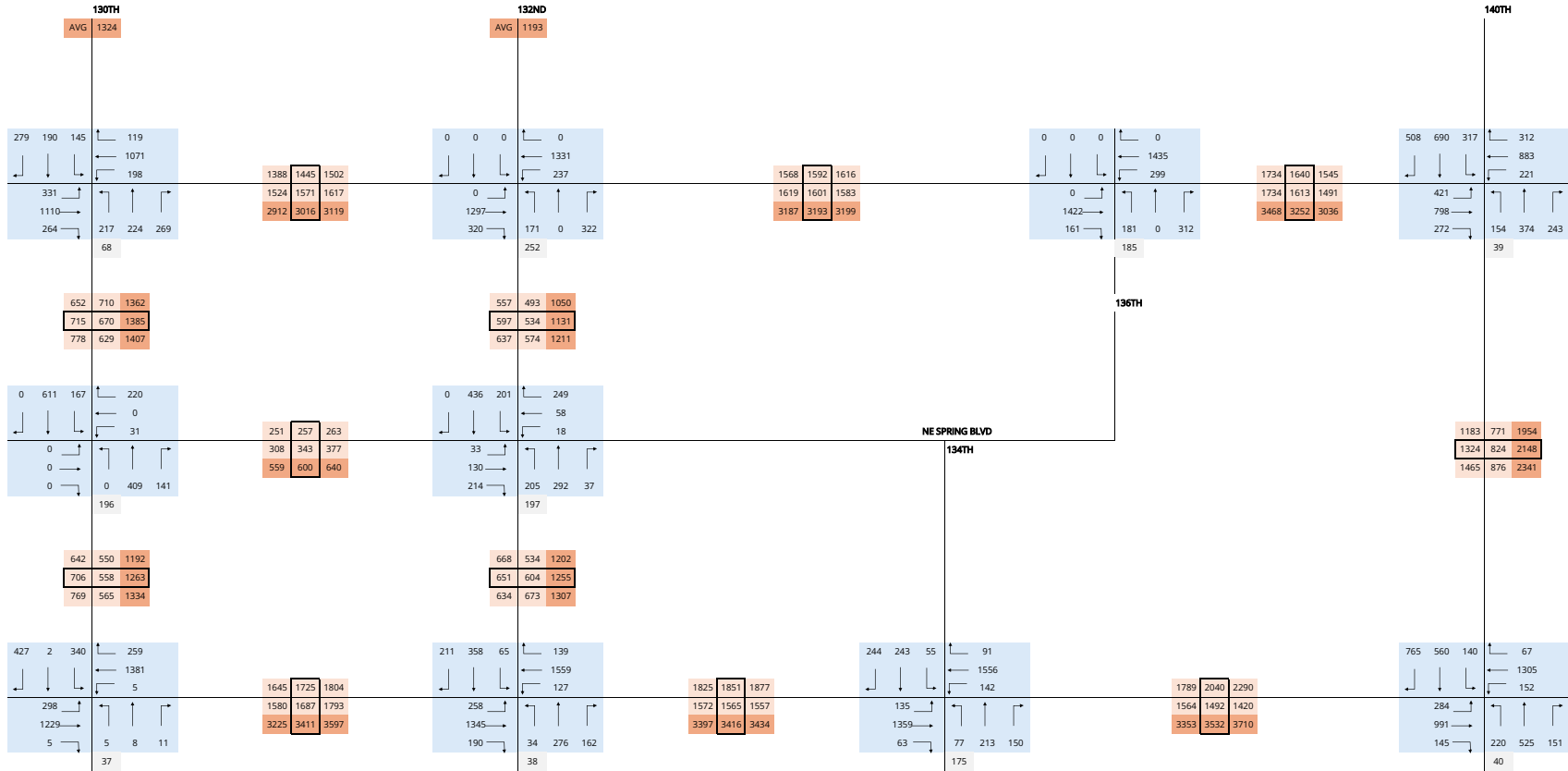
2044 Preferred Growth Alternative (130th Ave NE - 140th Ave NE)



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



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

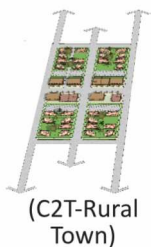


## ATTACHMENT B

### 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

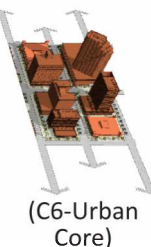


(C5-Urban Center)

	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

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**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**



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**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**

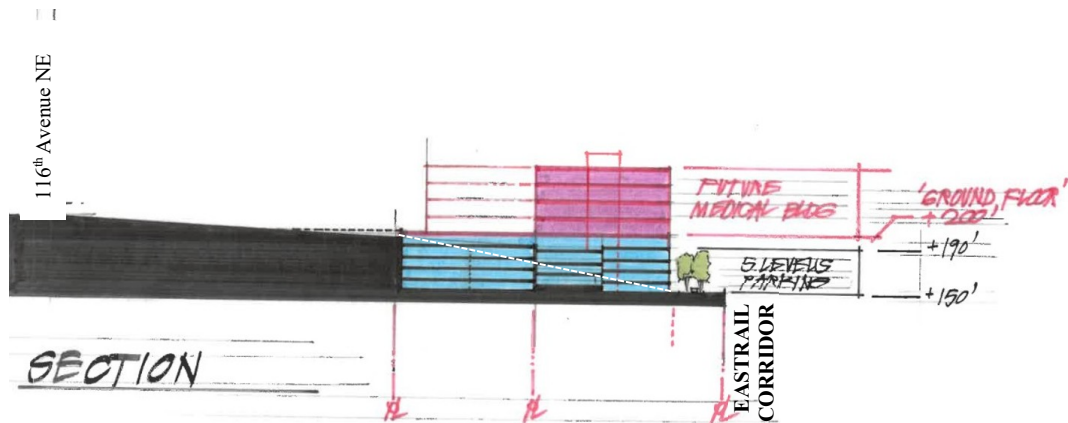
**Site Context:**

- 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

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**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

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**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

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**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

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**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  
450 110<sup>th</sup> 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,

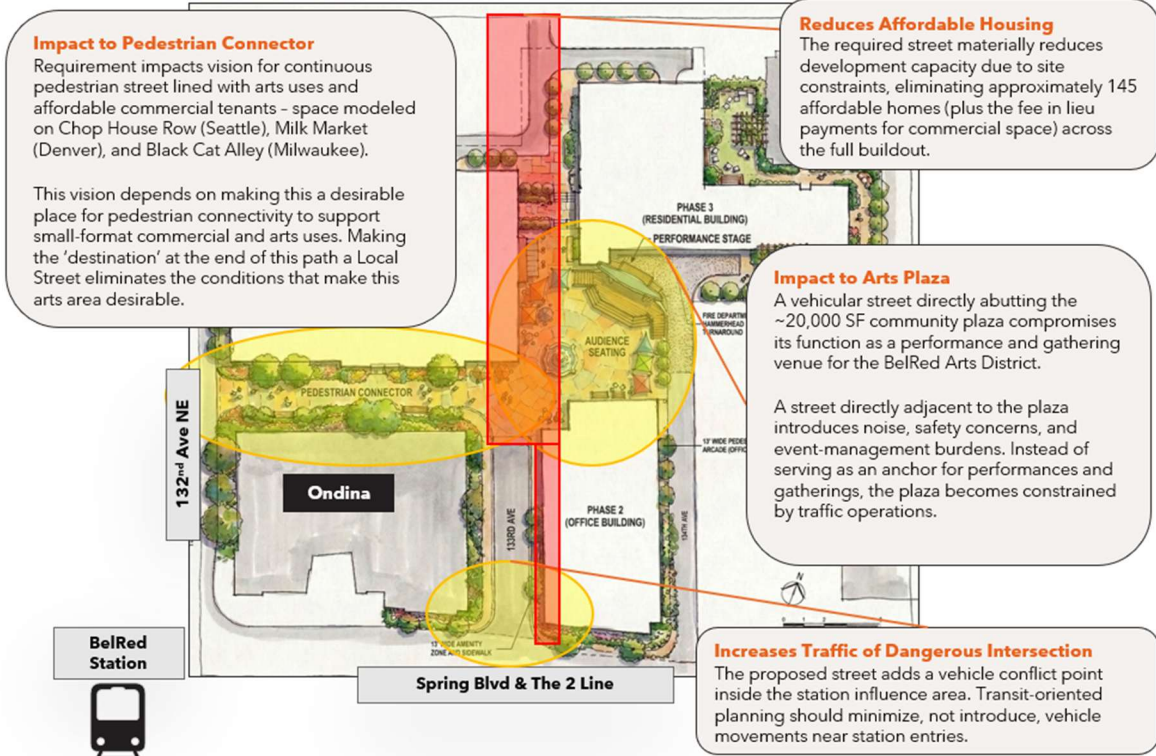
The latest BelRed LUCA draft reflects real responsiveness to stakeholder input, and we greatly appreciate all of the work staff has put into making this a successful process. The Bellevue City Staff team is truly world class and we have been very impressed by their work so far. Our team has a few comments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

**SITE VISION**  
**Local Street Requirement Eliminates the Public Benefits This Site Is Designed to Deliver**



**2. Community Amenity Incentives System & Residential Catalytic Program for BelRed**

- a. It is important for the Planning Commission to note that density itself will not be a significant enough incentive to reflect the real costs associated with implementing the LUCA as proposed. We want to highlight that key community amenities outcomes that were outlined by the BelRed Subarea Plan (affordable housing, public arts, public plazas, etc) likely will not be feasible to deliver given the current incentive plan.
- b. Wilburton has a Residential Catalyst Program. We ask the Planning Commission to establish a comparable program for BelRed, with a menu of incentive options (not density alone) calibrated to the true cost of delivering the outcomes the City has identified for this area. This structure rewards district-defining amenities and early movers, both of which will be essential to catalyzing the area.



### 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

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**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](mailto: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



# McCULLOUGH HILL PLLC

---

May 28, 2026

## VIA EMAIL

Bellevue Planning Commission

Email: [planningcommission@bellevuewa.gov](mailto:planningcommission@bellevuewa.gov)

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

Chair Khanloo and Commissioners:

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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.

## **2. Incentive Structure Does Not Reflect Project Cost Realities.**

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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**

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- 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

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**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 132<sup>nd</sup> 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](mailto:YichuanZ@Imaginehousing.org)

**Imagine Housing**  
1722 138<sup>th</sup> Place NE  
Bellevue, WA 98005

**P.S. We've moved!**

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## Nesse, Katherine

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**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 5<sup>th</sup> 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 27<sup>th</sup> 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](http://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

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**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 116<sup>th</sup> 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 116<sup>th</sup> 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	
<b>Total AIS Points Required</b>	<b>125,000</b>	

### 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 <sup>1</sup>	73.37 pts / \$1,000	\$1,704,000	
Outdoor Plaza <sup>1</sup>	8.8 pts / SF	14,205 SF	
Green Building — LEED Silver <sup>1</sup>	0.33 pts / GSF	<b>Not achievable <sup>2</sup> max 74,250 pts (59% of req.)</b>	y
Green Building — LEED Gold <sup>1</sup>	0.44 pts / GSF	<b>Not achievable <sup>2</sup> max 99,000 pts (79% of req.)</b>	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 <sup>3</sup>	3 pts / SF	41,667 SF	
Stream Restoration	66.7 pts / \$1,000 cost	\$1,875,000	
Natural Drainage <sup>3</sup>	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**

...

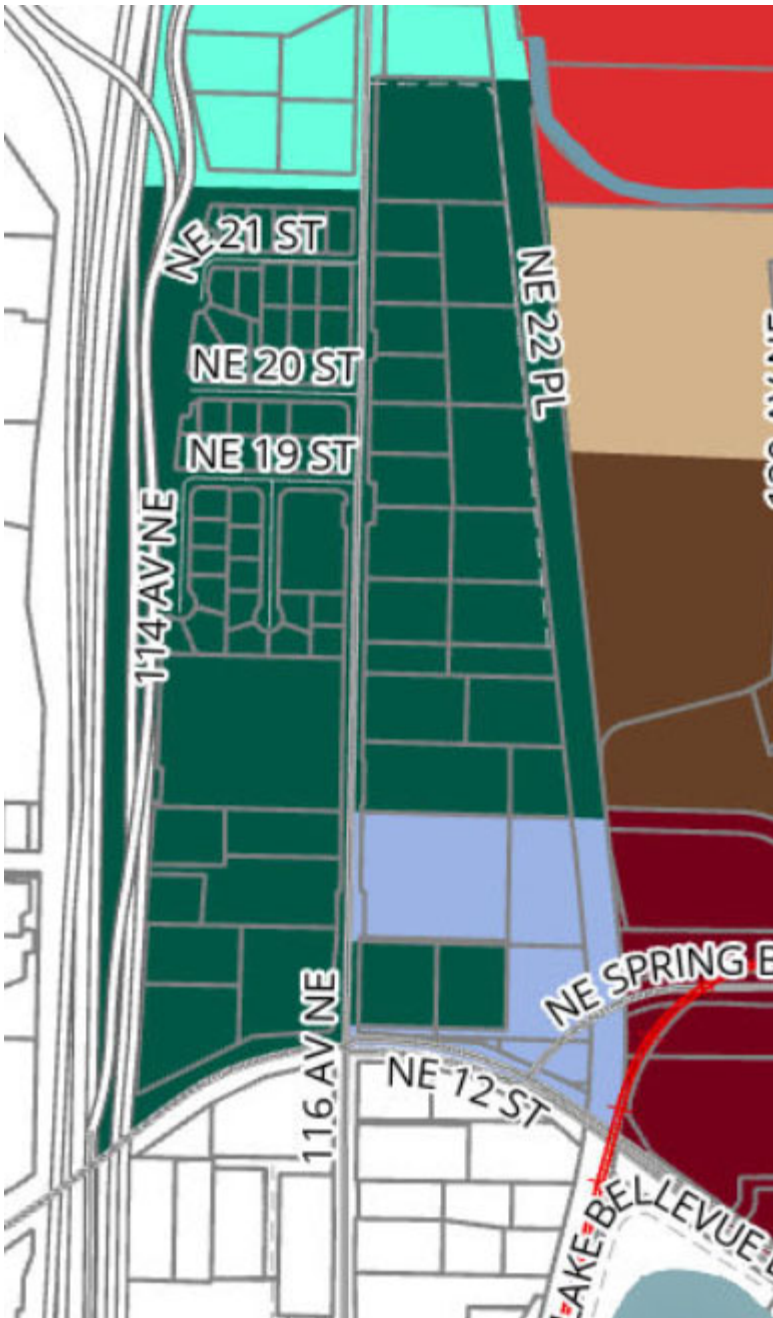
**Uses in Mixed-Use Highrise Land Use Districts – Dimensional Requirements**

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 116<sup>th</sup> Avenue NE is 2.0. Base FAR for residential development in the MUM-H land use district on the east side of 116<sup>th</sup> Avenue NE is 4.0.



*Kevin R. Wallace*  
330 112<sup>th</sup> 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
<b>Total AIS Points Required</b>	<b>125,000</b>	<b>25,000</b>	<b>0</b>

### 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 <sup>1</sup>	73.37 pts / \$1,000	\$1,704,000	\$341,000	None required
Outdoor Plaza <sup>1</sup>	8.8 pts / SF	14,205 SF	2,841 SF	None required
Green Building — LEED Silver <sup>1</sup>	0.33 pts / GSF	<b>Not achievable <sup>2</sup> max 74,250 pts (59% of req.)</b>	Entire building yields 74,250 pts	None required
Green Building — LEED Gold <sup>1</sup>	0.44 pts / GSF	<b>Not achievable <sup>2</sup> max 99,000 pts (79% of req.)</b>	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 <sup>3</sup>	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 <sup>3</sup>	0.7 pts / SF	178,571 SF	<b>35,714 SF</b>	None required
TDR	Rate TBD	TBD	TBD	None required

### NOTES

<sup>1</sup> 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).

<b><sup>2</sup> Green Building ceiling</b>	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.
<b><sup>3</sup> Practical constraints</b>	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.
<b>Source</b>	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

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**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](mailto:diana@bellevuechamber.org)  
330 112<sup>th</sup> Ave. NE, Suite 100, Bellevue, WA 98004





## PLUSH COMMITTEE

Permitting, Land Use, Sustainability, & Housing

[bellevuechamber.org](http://bellevuechamber.org)

425-454-2464

[staff@bellevuechamber.org](mailto: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

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**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

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