



FW: HOMA Code amendment comments doe 1/28 meeting

From Mark Edward Villwock <MEVillwock@drhorton.com>

Date Fri 1/23/2026 1:48 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Menard, Mathieu <MMenard@bellevuewa.gov>; Veronica Shakotko <Vshakotko@mbaks.com>

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Hello Planning Commission.

Thanks so much for all your work on this code project. As the City looks to increase the opportunities for housing in the mixed-use zones as was testified by the public at the last Planning commission requiring commercial pedestrian-oriented development in the right locations is important. Several properties have not been developed due to the current commercial requirements due to the very narrow allowance of departures from the requirement to have commercial uses on the ground floor. Therefore, we are recommending the following changes the proposed code changes to provide more flexibility. Please see our proposed edits below:

1. Based on the above we are proposing a little more flexibility within 20.251.050.A.1. The proposed changes would remove the requirement to require pedestrian oriented development on the ground floor if the adjacent ROW has a one way road along the frontage or the public road isn't an open through connection and just a dead end. Please see the proposed code langue below:

a. In the NB and CB districts, pedestrian-oriented use shall be provided along at least 50 percent of the total linear footage of any public right-of-way.

b. In the MU7, NMU, and MU16 land use districts, pedestrian-oriented use shall be provided along at least 66 percent of the total linear footage of any public right-of-way.

c. Pedestrian-oriented use required by this section shall be no more than 10 feet from the back of the sidewalk. This requirement may be waived by the Director if the construction of a building is impossible in this location due to a physical impediment which exists on the site and so long as the physical impediment did not come into existence due to the actions or omissions of any current or prior owner of the property.

d. Pedestrian-oriented use requirements shall not apply to lots with a square footage of less than 20,000 square feet.

2. Design Flexibility

a. Up to 15 percent of the required pedestrian-oriented uses may be located to the interior of the site rather than within 10 feet of the sidewalk if all of the

two-way, open public right-of-way that provides through connection

e. Pedestrian-oriented use requirements shall not apply if the frontage road is developed for one way traffic immediately adjacent to the subject property.

2. We feel that the departure langue should be slightly broader in order to allow develop to move forward when pedestrian oriented development doesn't make sense. We are proposing the following changes to 20.251.050.A.3.a

3. Departure

a. The Director may allow a departure from the requirement to provide pedestrian-oriented uses in multifamily developments; provided, that the departure is necessary to mitigate an economic hardship that would preclude project viability. A departure may be granted where the applicant demonstrates that:

i. The required pedestrian-oriented uses do not front on a major or minor arterial road.

ii. Visual and physical access to the required pedestrian-oriented uses is limited by topography or other site-specific obstacles.

b. The Director may grant a departure from the requirement to provide pedestrian-oriented uses in multifamily developments where the applicant demonstrates that:

i. The use is within a building and supports pedestrian activity;

ii. The use promotes a high degree of visual and physical interaction between the building interior and the adjacent public realm; and

, a right-of-way open to only one way traffic immediately adjacent to the subject property or a two-way, open public right-of-way that provides through connection; or

3. If the goal is to create additional housing options, why limit housing types? If the market does not support other housing types, the goal should be to create as many additional housing units as possible to alleviate the housing affordability crisis. Therefore, we propose the following change to 20.251.050.A.3.b to make the allowed housing types more flexible.

Housing Opportunities in Mixed-use Areas (HOMA) Strike Draft

Option A (mandatory affordable housing approach)

SIXTH DRAFT: 1/16/2026

iii. No greater than 50 percent of the residential units within the project limit are townhouses.

c. A departure may be allowed for all sides of the building or some portion thereof; provided, that the approved departure is consistent with Part 20.251 LUC. If a departure is granted, ancillary residential uses such as a meeting

Let us know if you have any questions regarding our proposed changes above.

Thanks
Mark



MARK VILLWOCK, PE
Division VP of Forward Planning

D.R. HORTON

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Comment for 26-143 Housing Opportunities in Mixed-Use Areas Land Use Code Amendment

From Evan Lee <evnl.business@gmail.com>

Date Sun 1/25/2026 4:43 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>; Council <Council@bellevuewa.gov>

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Impervious and Hard Surface Limits

I like that standards and regulations are mentioned in this section. I do worry which funds we would use to handle any adverse changes. The increases from 60-65 to 85-95 percent for impervious surfaces and from 85 to 95-100 for hard surfaces are significant since I could see them as decreases of 35-40 to 5-15 percent for non-impervious surfaces and 15 to 0-5 percent for non-hard surfaces.

Ground Floor Use Requirements

I want to see that ground floor residential may operate a qualifying small business and prohibit HOAs from making unreasonable demands that prevent business operations.

Sustainability certification assurance device

I wonder whether LEED is still relevant and whether there are alternative certifications that meet the city's needs better.

Green and sustainability factor

I do not agree that "certain required vehicular access and parking areas be excluded from the total lot area used in the calculation" unless the exclusion is capped. The formulation seems particularly easy to abuse.



HOMA Draft Comments | Northtowne Shopping Center (2616–2638 Bellevue Way NE)

From Lex Wieneke <lwieneke@trinityre.com>

Date Mon 1/26/2026 2:13 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Whipple, Nicholas <NWhipple@bellevuewa.gov>; Menard, Mathieu <MMenard@bellevuewa.gov>; Ian S. Morrison <imorrison@mhseattle.com>; Pete Stone <PStone@trinityre.com>; Kim Bentz <kbentz@northstream.com>; Mark Mowat <mark.mowat@mowatco.com>

1 attachment (552 KB)

Northtowne - HOMA Draft Comment Letter - 2026.1.26.pdf;

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Dear Chair & Members of the Bellevue Planning Commission,

Thank you for the opportunity to provide comments on the City of Bellevue's Housing Opportunities in Mixed-Use Areas (HOMA) Draft.

Attached please find our letter dated January 26, 2026, outlining our perspectives and recommendations regarding several proposed design standards and incentives as they relate to the Northtowne Shopping Center (2616–2638 Bellevue Way NE). Our intent is to support the City's housing production goals while ensuring the proposed framework remains practical, financeable, and responsive to the unique context of this site and surrounding neighborhood.

We would welcome the opportunity to connect with Planning Commission members and/or City staff to discuss our recommendations in more detail, and we are happy to make ourselves available at your convenience.

Additionally, we plan to have a member of the ownership team participate and provide public comments at the Planning Commission meeting this Wednesday, January 28.

Thank you again for your time and consideration. Please don't hesitate to reach out if you have any questions or would like to discuss further.

Sincerely,

Lex Wieneke

Partner

TRINITY REAL ESTATE

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3720 Carillon Point | Kirkland, WA 98033

lwieneke@trinityre.com | www.trinityre.com

January 26, 2026

VIA ELECTRONIC SUBMITTAL

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

RE: Housing Opportunities in Mixed-Use Areas (HOMA) Draft Comments
Northtowne Shopping Center – 2616-2638 Bellevue Way NE

Dear Chair and Members of the Planning Commission:

Thank you for the opportunity to comment on the City of Bellevue's Housing Opportunities in Mixed-Use Areas (HOMA) Draft. We appreciate the City's efforts to expand housing supply and encourage thoughtful mixed-use redevelopment. We are writing to provide comments on several proposed design standards in the HOMA Draft as they relate to the Northtowne Shopping Center, located at 2616–2638 Bellevue Way NE (Northtowne Shopping Center), and the practical implications these standards may have on the feasibility of redeveloping the site as a successful mixed-use project.

Northtowne Shopping Center comprises approximately 3.2 acres along Bellevue Way NE and is adjacent to Northtowne Neighborhood Park to the north, with established low-density residential uses to the east and south. While the site is well-located for neighborhood-serving uses, it is not situated within a high-intensity pedestrian corridor, nor does the HOMA Draft propose surrounding land-use changes that would materially alter existing pedestrian patterns or create more residential density that would support a broader demand for retail uses. Simply put, this is one node of density within a residential community. As such, it is uniquely situated and desires unique policy solutions.

Specifically, we recommend:

- **Greater Flexibility in Pedestrian-Oriented Uses for Northtowne Shopping Center**
 - I. Current Proposal: Requirement that 50% of street-facing façades be occupied by pedestrian-oriented uses (e.g., retail).
 - Concern: Northtowne Shopping Center currently functions successfully as a destination retail center with surface parking in front of commercial spaces. Given the surrounding single-family residential context and limited pedestrian traffic, the site does not operate—and is unlikely to evolve under the HOMA Draft—into a walkable, pedestrian-oriented retail corridor. Requiring a substantial amount of ground-floor retail under these conditions, especially when combined with lack of any ability to provide easily accessible surface parking for convenience shopping, presents a significant risk of prolonged vacancies, which can undermine project feasibility, diminish neighborhood vitality, and ultimately discourage redevelopment altogether. This outcome would run counter to HOMA's broader objective of encouraging new housing production, and slow redevelopment here.

- Proposed Solution for Northtowne: We recommend relaxing this requirement for sites that are not located in established or planned pedestrian-oriented districts, to a more tailored 33% pedestrian-oriented use. Alternatively, the City could allow a portion of required retail frontage to be satisfied through flexible uses such as live/work units and residential-user amenities like gyms and common area, similar to approaches used in other cities. These uses can support small-scale commercial activity while also contributing directly to housing supply. In addition, addressing the setback and surface-parking limitations discussed below would materially improve the viability of neighborhood-serving retail where it is required.

II. Current Proposal: Requirement that pedestrian-oriented uses be located no more than 10 feet from the back of the sidewalk.

- Concern: This prescriptive setback requirement limits design flexibility and may inadvertently prevent the creation of high-quality public realm features such as plazas, widened sidewalks, landscaping, or seating areas. In many cases, these elements can enhance the pedestrian experience more meaningfully than strict building placement alone and can improve the functionality and attractiveness of ground-floor uses. In addition, by providing more flexibility for design, the opportunity to create interesting, accessible and ultimately successful retail spaces would be enhanced.
- Proposed Resolution: Allow greater flexibility through the departure process to allow approval of alternative designs where the future project demonstrably enhance street presence, pedestrian comfort, and overall project quality.

III. Current Proposal: Prohibits surface parking between street-facing façades and the street.

- Concern: Retail success—particularly for grocery and neighborhood-serving uses—is heavily influenced by visibility and ease of parking access. A complete prohibition on limited, strategically placed surface parking may significantly impair customer convenience, and lead to unplanned prolonged vacancies for Northtowne Shopping Center. Given the auto-oriented nature of the site and surrounding area, this restriction may reduce the commercial viability of required retail uses.
- Proposed Resolution: We recommend relaxing this prohibition and allowing a departure process that permits a limited amount of well-designed, short-term customer parking along the street frontage where it can be demonstrated to support retail viability without compromising pedestrian safety or urban design objectives. We recommend allowing up to 2.0 stalls/1,000 sf of retail of surface level parking spaces if over 1 mile from light rail stop. Since our project at Northtowne Shopping Center is not an urbanized central business district location, this will improve chance of retail success and vibrancy onsite.

- **Grocery FAR Exemption**

Current Proposal: Floor area for grocery use may be exempt from FAR, subject to a permanent covenant requiring the space to be “exclusively reserved and utilized” as a grocery store for the life of the building.

- Concern: We strongly support the concept of a grocery FAR exemption, as grocery stores provide meaningful neighborhood amenities and can serve as anchors for mixed-use developments. However, i) building grocery stores in multifamily buildings is very expense and simply does not work without a significant incentive; the 1:1 incentive here is, in our view, inadequate to cover the additional costs and issues that a grocer provides and ii) the requirement that the space remain a grocery store in perpetuity is too restrictive and will be rejected by the investment community, thereby making the project unfinanceable. The grocery industry is evolving rapidly, and market conditions, consumer behavior, and store formats may change significantly over time. A perpetual use restriction introduces substantial long-term risk and may deter developers from utilizing the exemption altogether. If a grocery use becomes unviable, the restriction would result in prolonged vacancy and challenges to re-tenant, which harms the community.
- Proposed Resolution: We recommend i) increasing the FAR incentive for grocery uses such that each 1 SF of grocery space generates up to 3 SF of FAR bonus. In our view, a 3:1 incentive is likely necessary for the inclusion of a grocery store within a mixed-use building to be economically accretive given the construction cost, parking, unique design, loading, venting, ceiling height, structural, and operational requirements associated with grocery tenants. At a minimum, we recommend the City increase the incentive to 2 SF of bonus floor area for every 1 SF of grocery, and allow that bonus to apply not only to the grocery space itself, but also to all required pedestrian-oriented retail uses within a project that includes a grocery store. We further recommend ii) limiting the covenant requirement to the initial lease term, subject to a reasonable minimum duration (e.g., 10–25 years), rather than requiring grocery occupancy for the life of the building. This approach would preserve the incentive’s intent while acknowledging long-term market realities and supporting adaptive reuse if the use becomes unviable over time.

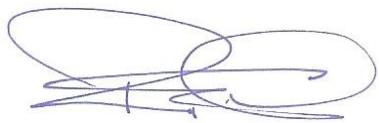
- **Mandatory Affordable Units and Ensuring an MFTE “Supercharger” Incentive**

HOMA is expected to include a base requirement to build 10% of units as Mandatory Affordable Units to assist with addressing the need for affordable housing. If the City goes with a mandatory program, it must ensure that it is paired with the Multifamily Property Tax Exemption (MFTE) “supercharger” where those MFTE units can be counted towards the affordability requirement for Northtowne Shopping Center. As the City recently showed with Wilburton, this is the only way to make redevelopment projects “pencil” in the HOMA areas. A mandatory requirement without additional incentives will stall housing creation.

We encourage the Planning Commission to make that MFTE supercharge concept clear now, so that potential redevelopment projects can rely upon that incentive to start planning.

We appreciate the City's consideration of these comments and would welcome the opportunity to discuss them further. We believe that modest adjustments to these standards would meaningfully improve the potential for high-quality redevelopment at Northtowne Shopping Center, and better align the HOMA framework with its housing and neighborhood vitality objectives for the Northtowne neighborhood. Please feel free to contact us with any questions.

Sincerely,



Richard Leider
Trinity Real Estate, LLC
Managing Partner



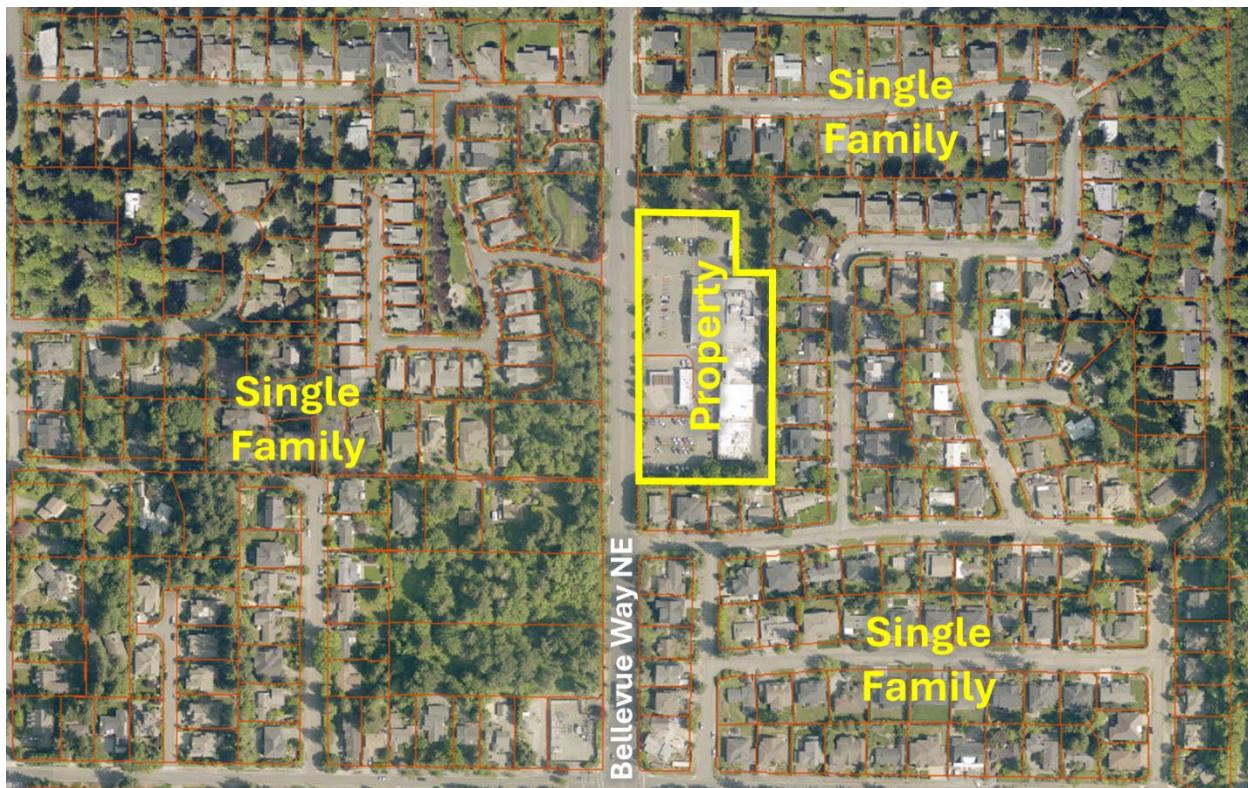
Pete Stone
Trinity Real Estate, LLC
Managing Partner



Lex Wienke
Trinity Real Estate, LLC
Partner

cc: Nick Whipple, City of Bellevue
Mathieu Menard, City of Bellevue
Kim Bentz, Northstream Development Co
Mark Mowat, Northstream Development Co

Exhibit A – Site Plan





HOMA LUCA Written Comments - January 28 Agenda

From Veronica Shakotko <Vshakotko@mbaks.com>

Date Mon 1/26/2026 3:59 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Menard, Mathieu <MMenard@bellevuewa.gov>; Gallant, Kristina <KGallant@bellevuewa.gov>; Whipple, Nicholas <NWhipple@bellevuewa.gov>; Nesse, Katherine <KNesse@bellevuewa.gov>

1 attachment (848 KB)

2026, 1-26 MBAKS Bellevue PC HOMA Comment Letter.pdf;

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Dear Chair Khanloo, Vice Chair Lu, and Members of the Planning Commission,

Thank you for your continued work on the HOMA code updates and for the opportunity to provide input ahead of your January 28 discussion. Attached is MBAKS's comment letter and below is a brief summary of our key points.

Ground Floor and Pedestrian-Oriented Flexibility: Targeted flexibility for pedestrian-oriented and ground-floor commercial requirements is needed to advance the City's housing goals. In certain locations, strict ground-floor requirements prevent otherwise viable housing projects from moving forward. Additional flexibility in base standards, departure provisions, and allowed housing types would better align with site context and support housing delivery.

Affordable Housing Requirements: Mandatory affordable housing fees or requirements within HOMA risk undermining the City's housing goals by reducing project feasibility and overall housing production. A voluntary, incentive-based approach is better aligned with delivering housing at scale in mixed-use areas.

We appreciate your time and commitment to a balanced, workable ordinance. If you have any questions, please don't hesitate to contact me.

Respectfully,
Veronica



Veronica Shakotko | Senior Local Government Affairs
Manager
Master Builders Association of King and Snohomish
Counties
m 425.435.8990
335 116th Ave. SE, Bellevue, WA 98004
mbaks.com

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PLUSH Comments: HOMA Code Update

From Nikki Stuck <nikki@bellevuechamber.org>

Date Mon 1/26/2026 5:40 PM

To Villaveces, Andres <AVillavece@bellevuewa.gov>; Ferris, Carolynn <CFerris@bellevuewa.gov>; Goeppele, Craughton <CGoeppele@bellevuewa.gov>; Khanloo, Negin <NKhanloo@bellevuewa.gov>; Lu, Jonny <JLu@bellevuewa.gov>; Kennedy, Mariah <MKennedy@bellevuewa.gov>; Nilchian, Arshia <ANilchian@bellevuewa.gov>; PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Jessica Clawson <jessica@mhseattle.com>; Joe Fain <joe@bellevuechamber.org>; Carlson, Diane (she/her) <DCarlson@bellevuewa.gov>; Horner, Rebecca D <RDHorner@bellevuewa.gov>; Whipple, Nicholas <NWhipple@bellevuewa.gov>; Menard, Mathieu <MMenard@bellevuewa.gov>

1 attachment (2 MB)

26.1.26 PC HOMA Letter.pdf;

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Chair Khanloo and Commissioners,

On behalf of the Bellevue Chamber's PLUSH Committee, the attached letter expresses our strong but conditional support for the proposed HOMA update. We appreciate the Commission's work and offer targeted recommendations to ensure feasibility and support the timely delivery of meaningful housing.

Please let me know if you have any questions.

Nikki Stuck | Public Policy Manager
Bellevue Chamber of Commerce
M: 443.789.8513 E: nikki@bellevuechamber.org
330 112th Ave. NE, Suite 100, Bellevue, WA 98004





PLUSH COMMITTEE

Permitting, Land Use, Sustainability, & Housing

bellevuechamber.org

425-454-2464

staff@bellevuechamber.org



January 26th, 2026

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

RE: Housing Opportunities in Mixed-use Areas Code Update

Dear Chair Khanloo and Members of the Planning Commission,

On behalf of the Bellevue Chamber's PLUSH Committee, we wish to express our strong, but conditional support for the HOMA code update and to thank staff and the Commission for your work to increase housing capacity in mixed-use areas across the city. In particular, we appreciate the nonconforming revisions to the code, and we support vesting provisions that give projects that are already underway or permitted certainty, while giving them an easy ability to flexibly opt in if it makes sense for them to do so.

As you finalize your recommendations, we respectfully request that you incorporate the following essential elements to ensure the HOMA legislation is both workable and effective in delivering housing — including affordable housing — in the near term.

1. Support for the 3% Floor Plate Bonus — Critical for Downtown Job and Tax Base Growth

We strongly support the 3% floor-plate bonus drafted as attached.

HOMA currently incentivizes residential projects through FAR exemptions and bonuses tied to affordable housing production. However, in office buildings, where on-site affordable housing will not be provided, there is no equivalent incentive or offset. That imbalance will discourage new office development downtown at a time when Bellevue must support job growth and its tax base alongside new housing. Bellevue's Comprehensive Plan includes a goal of adding 70,000 new jobs in 20 years; we cannot forget about job and tax base growth in addition to our housing goals.

At its most impactful, the bonus would only add 900 feet per floor to an already 30,000 s.f. floor plate; this creates an imperceptible change to a floor plate that provides an offset incentive to the fee-in-lieu the developer is being asked to pay toward affordable housing.¹ The downtown developers and

¹ 900 feet would only apply where allowed floorplates are 30,000; as a percentage, the additions would be reduced along with floor plate sizes per Chart 20.25A.060.A.4. The addition would be truly imperceptible from the outside viewing public, but is meaningful offset to a developer.

property owners you have previously heard from are in broad agreement regarding the attached recommended language, which reflects consensus within the business and development community.

In addition, if permitted projects are allowed to “opt-in” to paying this fee-in-lieu in exchange for very modest additional floor area, there is a chance some projects may take advantage of this, adding to the City’s affordable housing fund. We respectfully request the Planning Commission include the 3% floor plate bonus, as attached, in its final recommendation to the Council.

2. Mandatory Housing Affordability Must Be Paired With an MFTE “Supercharger”

If HOMA ultimately includes mandatory affordability requirements, then the legislation must include a companion MFTE supercharger, like what Bellevue successfully established in Wilburton. Without this tool, many projects will not pencil under a mandatory requirement, per the City’s own data.

Bellevue has already demonstrated in Wilburton that an MFTE supercharger can deliver substantial affordable housing and significant market rate production immediately, and at a relatively small public cost. This is the proven tool that makes mandatory programs feasible.

A mandatory affordability requirement without a supercharger will stall housing production at precisely the moment when Bellevue needs units the most. We oppose any mandatory housing program without the commensurate MFTE offset.

We recognize that the MFTE policies may not be directly addressed in the HOMA work. However, the city has recently committed to bringing forward MFTE changes along with any sub-area rezones so that the economics of these decisions can be addressed in their entirety. We therefore urge the Planning Commission to recommend inclusion of an MFTE supercharger as a core component of any mandatory affordability framework adopted under HOMA.

3. Grocery Store Bonus — Covenant Duration Must Align With Market Reality

We strongly support the grocery store bonus as a tool to encourage full-service grocery availability throughout Bellevue. However, the covenant requirement in the code must align with market practice for the bonus to actually be used. Most grocery leases begin with an initial 25-year term, sometimes followed by optional 10-year extensions. A “perpetual” covenant requirement could deter participation entirely.

Seattle’s Housing Opportunities legislation — set for Council action in March — includes a 25-year covenant for grocery and other commercial incentive spaces. We strongly encourage Bellevue to adopt the same 25-year covenant term within the FAR exemption structure in HOMA.

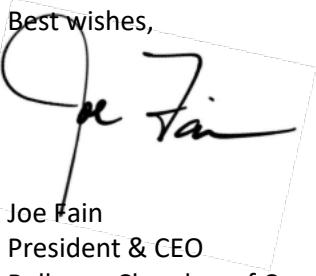
Recommended Approach for Bellevue (Modeled After Seattle):

- Require a 25-year covenant for qualifying grocery store space.
- After 25 years, if (1) commercially reasonable and good faith efforts to lease the space to a qualifying grocery tenant have failed, and (2) the owner seeks release, then:
 - The covenant may be released upon payment of the then-current per square foot affordable housing fee-in-lieu applicable to the controlled space.

This approach recognizes real world leasing conditions, maintains predictability for developers and owners, and ensures the public receives a definable community benefit in exchange for the additional density — either through continued grocery service or through a meaningful in lieu contribution.

The PLUSH Committee appreciates the Commission's extensive review and thoughtful engagement throughout this process. We also wish to share our appreciation for Staff's open door in discussing proposed changes and the progress that has been made to date. HOMA is a significant opportunity to modernize the code, improve feasibility, and meaningfully increase housing supply citywide. Please consider the modifications above to ensure the code works to achieve the City's goals of providing 35,000 housing units and 70,000 jobs in the next 20 years.

Best wishes,


Joe Fain
President & CEO
Bellevue Chamber of Commerce
On behalf of the PLUSH Committee

Cc: Diane Carlson, City Manager

Proposed HOMA Amendment

20.25A.070 Amenity incentive system and floor area ratio

C. FAR Exemptions, Special Dedications, and Conversion of Previously Approved Exempt Retail Activity Space. ...

2. Affordable Housing Development Flexibility. ~~A maximum of 1.0 FAR of floor area may be exempted to support the provision of affordable housing, minimum parking may be reduced, and additional development flexibility allowed, as provided below.~~

a. For every gross square foot of affordable housing provided on-site, a development may exempt four gross square feet of market-rate housing, up to a maximum of 50 percent of the base FAR in the land use district in which the building containing the exempted market-rate housing is located. ~~1.0 FAR of floor area dedicated to supporting the creation of on-site affordable housing shall not be counted for the purposes of calculating the FAR of a project; provided that:~~ b. ~~Reduced Minimum Parking Ratio for Affordable Units. Affordable studio and one[1]bedroom units located in projects meeting the requirements of subsection C.2.a of this section shall have a minimum parking ratio of 0.5 stalls per unit.~~

c. Additional Development Flexibility. Projects that provide 0.5 FAR or greater of the exempt floor area earned through the provisions of on-site affordable housing may:

i. Increase the maximum lot coverage by five percent in Perimeter Overlay Districts A-1, A-2, A-3, B-1, and B-2; ~~and~~

ii. ~~For buildings that are not located in the Perimeter Overlay, decrease the upper-level stepbacks required under~~ LUC 20.25A.075.C by a maximum of five feet; ~~and~~

iii. ~~For buildings that are both less than 100 feet in height and located within the Perimeter Overlay, decrease the upper-level stepbacks required under LUC 20.25A.075 by a maximum of fifteen feet; For buildings located within the Perimeter Overlay, increase maximum building heights listed in Chart 20.25A.060.A.4 by 25 feet; and~~

iv. ~~Exempt buildings that are both less than 80 feet in height and located in the Perimeter Overlay from the maximum floor plate above 40 feet requirements listed in Chart 20.25A.060.A.4.~~

d. ~~Projects that utilize the payment option for affordable housing under Section 20.25A.070.D.2.c may increase the maximum floor plate above 40' and the maximum floor plate above 80' under LUC 20.25A.060 in each case by three percent (3%) and such increased floor plate area shall be exempt floor area.~~



HDC and EAHC Support for HOMA "Option A"

From Brady Nordstrom <brady@housingconsortium.org>

Date Tue 1/27/2026 10:43 AM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Patience Malaba <patience@housingconsortium.org>; Chris Buchanan <cbuchanan@bellwetherhousing.org>; Allen Dauterman <adauterman@twgdev.com>

1 attachment (264 KB)

HDC&EAHC_BellevueHOMA_1-28-2026.pdf;

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Dear Bellevue Planning Commission,

I am reaching out on behalf of the Housing Development Consortium and the Eastside Affordable Housing Coalition. We urge you to support the staff recommended **HOMA "Option A" with a well-calibrated affordable housing requirement** in mixed-use areas. **Please see the attached letter as our full comment**, which summarizes and expands upon comments we made on March 26th, May 13th, September 10th, and October 8th, and December 10th of 2025.

Since Bellevue City Council recently directed staff to analyze, propose, and pass MFTB updates simultaneously alongside Planning Commission recommended land use code updates, we urge you to pass the HOMA package that will best help City of Bellevue meet its affordable housing targets-- of which 84.7% are between 0 and 80% from 2019 and 2044.

Thank you for your strong values to support affordable housing and include moderate income workers and families in Bellevue's future. Please reach out if you have any questions or want to chat further.

Best Regards,
Brady Nordstrom

--

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



HOUSING DEVELOPMENT *consortium*

January 28, 2026
Bellevue Planning Commission
450 110th Avenue NE
Bellevue, WA 98004



Subject: Comment on HOMA for 1/28/2026 Study Session and PC Recommendations

Dear Bellevue Planning Commission:

The Eastside Affordable Housing Coalition ("EAHC") is a group of over 30 local organizations that build, operate, and advocate for affordable housing on the Eastside, including in Bellevue. Together we support policies, programs, and funding that advance the production and preservation of affordable homes while increasing housing access and opportunity. **We are writing to comment on the Housing Opportunities in Mixed-Use Areas ("HOMA") Land Use Code Amendment ("LUCA"), especially as it pertains to helping Bellevue meet its commitment to create 5,700 units of affordable housing between 2026 and 2036.** This is a follow-up to our comments to the Planning Commission on March 26th, May 13th, September 10th, and October 8th, and December 10th of 2025. The Eastside Affordable Housing Coalition strongly urges you to support the staff recommended **HOMA "Option A"** with a **well-calibrated affordable housing requirement** in mixed-use areas.

Recently, City Council directed staff to present Planning Commissioner LUCA recommendations, like HOMA, alongside simultaneous future MFTE updates for Council discussion and final action. This will include neighborhood-specific economic analysis on different affordable housing and MFTE calibrations. We celebrate this process improvement. MFTE is an essential tool to maintain project feasibility through economic cycles. Thus, an affordable housing requirement must advance in tandem with MFTE updates. The Planning Commission now has the chance to focus less on the uncertainty of the economics and more on how the land use elements can best help Bellevue meet its state and regional housing goals (see: [King County Countywide Planning Policies](#)) from 2019-2044. 84.7% of this housing growth must be between 0% and 80% AMI.

We also urge you to consider the points below as you contemplate your recommendations:

- **An affordable housing requirement will always produce more affordable housing than an incentive program using the same percentages and income targeting.** This is supported by decades of local housing data that shows incentives simply do not work at scale to support affordable housing, while a well-calibrated requirement does.
- An immense value is created for landowners through an upzone. For example, based on public appraisal data, the upzone on the Wilburton TOD site created \$2.1 million of value that didn't exist before. While we aren't arguing that this windfall to landowners itself is problematic, we do believe that Bellevue should capture a portion of this generated value to create public benefit for current and future residents.
- This proportional value exchange of the affordable housing requirement is legal and common nationally and in many neighboring cities. Compared to Bellevue's neighbors, **the proposed affordable housing requirement in HOMA is among the lightest touch policies in the entire region** and—as stated earlier-- this will be paired with MFTE when council passes the final code package. Other cities, like Seattle, do not allow MFTE to be paired with a mandatory affordable housing requirement.
- The impact of the affordable housing is very modest compared to other costs. For example, recent [Seattle MHA analysis](#) that shows that inclusionary zoning represents only a fraction of the project costs (4%) compared to land (14%), soft costs (8%), hard costs (65%), and financing costs (9%) for a sample 2024 mid-rise project. Costs like parking, financing (including interest rates), materials, labor, and loss of developable capacity represent a greater barrier to development. Bellevue staff are also proposing other cost-savings beyond the upzone, including eliminated setbacks and landscaping requirements, eliminated limits on lot coverage, removed multifamily play area requirements, and FAR exemptions for desirable uses like childcare, grocery stores, non-profits, etc.

- HOMA's mixed-use areas have differences compared to Wilburton, but there are other advantages—such as significantly lower *infrastructure costs*—that will help an affordable housing requirement succeed. Land costs are also generally less in the city's mixed-use areas compared to Wilburton. Land is much more significant in driving overall development cost compared to an affordable housing requirement. Remember: the policy isn't legal if the cost of providing affordable housing is greater than the value from the upzone and other development cost savings provided by the City.
- An affordable housing requirement is being proposed in mixed-use areas only. Instead, an adjusted incentive is being proposed downtown. We support the inclusion of affordable housing in the downtown amenity incentive system. We also support the generous concessions being proposed by staff to make the Downtown code work better for development.

HOMA represents a major opportunity to implement the City of Bellevue's Comprehensive Plan Vision. The upzone, code-based cost savings, and future pairing with a calibrated MFTF program are what make the affordable housing requirement possible. **We therefore challenge you to make affordable housing your top priority in this land use code update and to support "Option A" which is well-calibrated to work alongside robust market-rate development.** Thank you for aligning this code with Bellevue's values to remain a welcoming, diverse city that includes moderate- and lower-income workers and families.

Sincerely,
Eastside Affordable Housing Coalition & HDC



Agenda Item 8.a) HOMA

From Kevin Wallace <kwallace@wallaceproperties.com>

Date Tue 1/27/2026 12:20 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Menard, Mathieu <MMenard@bellevuewa.gov>; Gallant, Kristina <KGallant@bellevuewa.gov>; Whipple, Nicholas <NWhipple@bellevuewa.gov>; Horner, Rebecca D <RHorner@bellevuewa.gov>

📎 1 attachment (142 KB)

HOMA Downtown Summary and Requests 012726 Clean.pdf;

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

Dear Commissioners,

I want to thank staff for negotiating with me and other developers and property owners in downtown on the HOMA LUCA. While the new code imposes some burdens, there are enough benefits that the good outweighs the bad. If you're interested in the details I attached a memo that includes the proposals I discussed with staff and categorizes them by the items left unresolved and the many items where we reached agreement.

My only remaining request is to modify 20.25A.070.C.2.c.v as shown below. The provision allows midrise buildings that provide affordable housing to have unlimited floorplates. There are two elements to my requested changes:

- Increase height limit from 80' to 85'. The additional development flexibility (ADF) provisions already allow buildings in the perimeter overlays to be built to 95'. The height limit for midrise, wood frame buildings under the building code is 85', so an increase from 80' to 85' is consistent with the building code, yet still lower than the max height allowed in the overlays. At 80', many projects would have to eliminate a floor of housing or have cramped residential floor heights in order to use this benefit, making it much less likely that they would do so.
- Allow the benefit in Downtown areas outside of the perimeter overlays. The unlimited floorplate benefit is meaningful and may entice more developers to provide affordable housing in their buildings if it's applied to all areas of downtown. Currently there is not enough benefit for areas outside of the perimeter overlays to justify the cost of providing the affordable housing.

If I understand staff correctly, they support this request but it did not get picked up in the Sixth Draft. I also did not see mention of it in the agenda packet, so I want to call it to your attention, remind staff about it, and ask that the code amendment get approved.

Other than this one request I support the code as drafted and encourage you to recommend it to the Council for adoption.

Thanks for your consideration of this request, and thanks again to the staff for your collaboration.

Chart 20.25A.060.A.4 by 25 feet; and

v. Exempt buildings that are both less than 80 feet in height and located in the Perimeter Overlay from the maximum floor plate above 40 feet requirements listed in Chart 20.25A.060.A.4.

85 feet or less

Kevin R. Wallace

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

To: Mathieu Menard, Nick Whipple, Kristina Gallant, Rebecca Horner
City of Bellevue
From: Bellevue Chamber PLUSH Committee
Date: January 23, 2026
Re: Changes to Downtown Land Use Code in HOMA Ordinance – Review of Sixth Draft (1/16/26)

Dear Mathieu, Nick, Kristina and Rebecca,

This memo follows our letter of September 9, 2025 to the Planning Commission regarding the proposed changes to the Downtown Land Use Code (Chapter 20.25A) in the Draft Housing Opportunities in Mixed-use Areas (HOMA) Strike Draft Option A Fourth Draft 7/1/25 (the “HOMA Ordinance”). The tables below are organized into the following sections:

- I. Requested revisions to the HOMA Ordinance.
- II. Additional requested changes to the land use code to modernize the code, reduce costs and complexity and achieve consistency with the recently enacted Wilburton LUCA.
- III. Proposed changes to the HOMA Ordinance that we support (table of wins).

I. Requested Revisions to Downtown LUC Provisions of HOMA Ordinance.

Code Section	Revision	Comment	Consistent with Wilburton?
20.25A.070.C.2.v. 1/16/25: Change not made.	<u>AHDF Incentive: Unlimited floorplates for midrise buildings.</u> Change from “Exempt buildings that are both less than 80 feet in height and located in the Perimeter Overlay from the maximum floorplate above 40 feet requirements...” to “Exempt buildings that are 85 feet or less in height from the maximum floorplate above 40 feet requirements...”	In Wilburton there is no floorplate limit for buildings 100' in height or less. Allowing it to apply in non-overlay areas increases the likelihood that on-site affordable housing will be provided.	N/A
20.25A.070.C.2.vi 1/16/25: Change not made. Staff agreed to carry this forward to DTL 2.0 LUCA. OK	<u>AHDF Incentive (new):</u> For buildings located within the Perimeter Overlay, eliminate the trigger height requirement listed in Chart 20.25A.060.A.4.	Currently a midrise building in the A-2 overlay has to comply with trigger height requirements if taller than 55'. The trigger height requirement to provide 10% of the site area as outdoor plaza is unreasonable for midrise buildings. This should be allowed as a simple code change without requiring affordable housing, but at least making it a useful benefit in exchange for providing affordable housing is reasonable.	N/A

Code Section	Revision	Comment	Consistent with Wilburton?
		In the B-1 overlay the trigger is at 99'. If the trigger height requirement is not removed it will deter the use of additional height in the B-1 overlay because any additional height above what is currently allowed would trigger the requirement to provide 10% outdoor plaza.	
20.25A.070.D.4(18) 1/16/26: Proposed change refers to city-wide LUC 20.20.420.C which says Directors Rule will provide requirement. OK but follow up.	<u>Delete the requirement for a performance bond for use of the LEED incentive.</u>	The performance bond is a major deterrent to the use of the LEED incentive.	Yes. See 20.25R.050.D.2.g.
20.25A.075.C.1. 1/16/25: Change not made. Staff agreed to carry this forward to DTL 2.0 LUCA. OK	<u>Stepbacks.</u> Eliminate the stepback requirements for midrise buildings by changing the word “building” to “tower”.	The staff-proposed change moved the stepback from “between 25 feet and the level of the first floor plate above 40 feet” to “ <i>no greater than</i> the first full building story above 110 feet in façade height.” If a building is less than 110 feet in height it is unclear whether the requirement still applies. Stepbacks are not required in Wilburton for mid-rise or Towers.	Yes. Stepbacks are not required for any building, and amenity points are awarded if the stepback is provided. See 20.25R.050.D.2.m.
20.25A.080.B Footnote 6 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Visitor Parking.</u> Delete footnote 6, which requires visitor parking in addition to the residential parking.	Residential parking minimums should be <i>inclusive</i> of visitor parking, not exclusive. Wilburton does not require provision of residential visitor parking stalls in addition to residential parking requirements.	Yes. See 20.25R.030.F.3, which refers to 20.20.590, which does not require visitor parking.

II. Additional Code Changes to Modernize the Downtown Code to Reduce Costs and Delays in the Production of Housing

Code Section	Revision	Comment	Consistent with Wilburton?
4.52.090.A.3.a 1/16/26. Rejected. We can take this up	<u>Allow the MFTE supercharger to apply to ADF units.</u> Amend the “Overlap” subsection to allow overlap of MFTE and affordable housing incentive units in Downtown without the 15% AMI reduction.	This would allow projects to overlap MFTE units with the on-site 50-year affordable housing delivered through use of the FAR exemption, amenity point requirement or AHDF, such that the total number of affordable units is 20% at 80% AMI.	Yes, assuming supercharger is adopted for Wilburton.

Code Section	Revision	Comment	Consistent with Wilburton?
in MFTE conversation. OK.			
20.15.060.B.5 To be discussed in Director's Rule conversation.	Bedroom Mix. Change "is the same proportion" to "is <u>substantially</u> the same proportion".	It is not possible to get the affordable bedroom mix to be exactly the same proportion as the market-rate unit bedroom mix.	The affordable housing code would be applicable to both Wilburton and Downtown.
20.15.060.B.7 To be discussed in Director's Rule conversation.	<u>Comparable Materials</u> . Change "those of the other dwelling units in the development" to "at least an equal number of other dwelling units in the development."	This allows for the ability to provide some higher-end units, increasing project viability. For example, if a project has 20 affordable units it must have at least 20 market-rate units with the same materials, finishes, etc.	The affordable housing code would be applicable to both Wilburton and Downtown.
20.25A.010.A 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Active Use Definition</u> . Delete the Downtown definition of Active Uses and instead use the city-wide definition (20.50.010 A).	This expands the list of acceptable "service" uses and provides standards for the Director's approval.	Yes. Wilburton uses the city-wide definition of Active Uses.
20.25A.020.A 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>DT-Build-To Line</u> . Replace "upon the request of the applicant, it is designated otherwise by the Director through an Administrative Departure pursuant to LUC 20.25A.030.D.1" with "except as necessary".	The effect would be to allow buildings to deviate from the build-to line for open space of any kind, or building modulation, without need for a departure request. 20.25A.060.A.1 already says this, but the definition of Build-To Line added the departure request requirement.	Wilburton does not have a build-to line requirement.
20.25A.120.A.5 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Green Factor points – vegetated walls</u> . Increase vegetated walls to 0.5.	This is consistent with Wilburton LUCA. The change was requested by a landscape architect and staff agreed it was a reasonable request.	Yes. See 20.25R.030.D.2.e.
20.25A.170.A.8.b 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Above grade parking standards</u> . Replace the standards for elevated parking with the more simplified requirements of 20.25R.040.D.3.b.	The current Downtown requirements make it infeasible to build above-grade parking. The Wilburton standards address aesthetic concerns and make it viable, albeit still expensive, to build above-grade.	Yes. See 20.25R.040.D.3.b.

Code Section	Revision	Comment	Consistent with Wilburton?
20.25A.170.B.1.b.ii 20.25A.170.B.2.b.ii 20.25A.170.B.3.b.ii 20.25A.170.B.4.b.ii 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Weather protection depth.</u> Exempt weather protection from areas where the building is not on the build-to line or enhanced streetscape. Alternatively, adopt the requirements of 20.25R.030.E.4.	Weather protection requirements have caused innumerable challenges in Downtown. The Wilburton requirements are reasonable.	Yes. 20.25R.030.E.4.
20.25A.170.B.1.b.v 20.25A.170.B.2.b.v 1/16/25: Change not made. Staff agreed to carry this forward to Parking LUCA. OK.	<u>Active uses on “A” and “B” Rights-of-Way.</u> Reduce from 100% of street wall to 75%.	75% is consistent with the Wilburton LUCA standards. It is infeasible to provide 100% active uses along a street wall.	Yes. 20.25R.030.B.2.a.
20.40.500 1/16/26: vesting language is still being discussed. Not yet in code.	Vesting. Allow projects that have <i>submitted</i> MDP or ADR applications prior to the adoption of the ordinance to (a) elect to vest to the current land use code; or (b) elect to utilize the new land use code provisions without resubmitting and application.		N/A

III. Supported/Acceptable Changes to Downtown LUC in HOMA Ordinance (Table of Wins).

Code Section	Revision	Comment
20.25A.010.B.2.b and 20.25A.060.A.4.	Addition of DT-O-2 West zone	Rezones KDC's land from MU to O-2, providing additional height and density for their property.
20.25A.020.A & B.	Deleted definition of Tower, Transparency, Weather Protection and Building Height-Transition Area Design District	Tower, Transparency and Weather Protection definitions were moved verbatim to the city-wide definitions section 20.50.048. Building Height-Transition Area Design District is a term that is no longer used.
20.25A.040	The <i>Fana</i> fix is adequately addressed in the proposed 20.20.561	
20.25A.060.B.3	Perimeter Overlay FAR Flexibility	Allows unutilized FAR in an overlay to be used in another overlay or no overlay area. This language is verbatim with the previously enacted IOC, except it now includes all perimeter zones (previously some were excluded).

Code Section	Revision	Comment	
20.25A.070.C.2.a	Affordable Housing exemption increased from 1.0 FAR to 50% of Base FAR. 1/16 Update: Language is clearer, as requested.	A helpful increase to the exemption. Still less than half of Wilburton – see 20.25R.050.D.1.a.i.	
20.25A.070.C.2.b	Increasing the bonus floor area ratio (FAR) for on-site affordable housing from 1:2.5 to 1:4.0.	This is consistent with the IOC and Wilburton (20.50R.050.D.2) and provides a more adequate incentive for providing on-site affordable housing.	
20.25A.070.C.2.c	The buy-in for the use of the ADF is 0.5 FAR, including both the affordable housing floor area and the bonus area.	This change was made at our request and is consistent with the IOC.	
20.25A.070.D.2.b.i	Affordable housing amenity point requirement.	The consensus is we are willing to agree to this if we can secure some reasonable fixes to the land use code that offset the cost of this tax.	
20.25A.070.D.2.b.iii	The final 25% of amenity points can be used for any available option.		
20.25A.070.D.2.b.iv	Small sites can obtain amenity points from any available option.		
20.25A.070.D.2.c	Addition of in-lieu fee for affordable housing at \$13 per amenity point. In addition, the point at which the \$13 is set is the date of adoption of the ordinance (previously it was 7/1/25).	The fee amount per point is acceptable, as is the effective date.	
20.25A.070.D.4.(1)	Adding affordable housing as an amenity point option.	The ability to achieve 4 amenity points for every one square foot of affordable housing is acceptable as an option on the menu of potential amenity points.	
20.25A.070.D.4.(6)	Improvement to the 30" rule for outdoor plaza.	Some edits are proposed in Section I above, but it's substantively acceptable. 1/16/26: Edits were made. OK.	
20.25A.075.A.3	Reduction of Outdoor Plaza requirement from 10% to 7%. Fix to Outdoor Plaza design criteria.	This closer to Wilburton's 7% open space standard, and a reasonable compromise. The design criteria fix needs some wordsmithing (see Section I above) but is substantively agreeable.	
20.25A.075.A.2.b Change made.	<u>Floorplate averaging.</u> Change 100' back to 80'.	Changing it back to the current code language (80') is consistent with the existing steps in the floorplate limits and eliminates an unnecessary reduction in floor plate sizes.	There is only one floorplate step at 55' in Wilburton, making floorplate averaging unnecessary. 20.20.010.
20.25A.075.B.3	Reducing the outdoor plaza requirement from 10% to 7%.	Positive change, and more consistent with Wilburton.	

Code Section	Revision	Comment	
20.25A.075.B.3.b	<u>Edit to: "...at least one additional plaza entrance shall abut and be located within 30 inches..."</u>	Using the word "entrance" without "plaza" causes potential confusion with a building entrance vs. the plaza entrance.	N/A. Wilburton uses the concept of open space, not outdoor plaza.
20.25A.075.C.1	Increase of stepback point on towers to "at a height no greater than the first full building story above 110 feet in façade height."	This is acceptable for towers, but see comment in Section I above requesting clarity that the stepback requirements are eliminated for midrise buildings.	
20.25A.080.B.	Reduction in parking minimums for residential from 1.0/unit to 0.5/unit and exemption of parking for affordable units.	OK.	
20.25A.080.F.2.	<u>Compact Parking.</u> Change to: "This subsection supersedes LUC 20.20.590.K.9. For all uses, the property owner may design and construct up to 65 percent of the parking spaces in accordance with the dimensions for compact stalls provided in LUC 20.20.590.K.11."	This language is from Wilburton LUCA Section 20.25R.030.F.4. It allows 65% compact stalls without a departure. The Downtown LUC, due to a code drafting error, requires a departure for even one compact parking stall.	
20.25A.110.B.2. –	<u>5' Landscape Buffer.</u> Eliminate the requirement to provide a 5' Type III landscape buffer on rear yards and side yards if buffering a surface vehicular access or parking area.	The 5' buffer from rear yard and side yard is not required for O-1, O-2 and OB zones, but is required for MU, R, OLB and Perimeter Overlay. The requirement produces absurd and burdensome requirements. Staff has been accommodating with reasonable departure requests, but there are no valid public policy reasons for keeping this rule in place. It only serves to drive up the cost and complexity of building new buildings in Downtown, and forcing landscaping where it doesn't belong.	Wilburton has a less restrictive landscape buffer requirement than Downtown – see 20.25R.030.C.9.b.
20.25A.120.A.4.	<u>Green Factor denominator excludes interior driveways.</u> Add "Required vehicular travel and parking areas, dedicated emergency vehicular access, critical areas and buffers, and traffic circulation may be deducted from the site area for the purpose of calculating the Green and Sustainability Factor."	This language is in the Wilburton LUCA. For sites that have interior drive lanes, the 0.30 green factor requirement produces absurdly high requirements because projects can't landscape the drive aisles. It's unduly burdensome and arguably not what was intended by the code.	



RE: Agenda Item 8.a) HOMA

From Kevin Wallace <kwallace@wallaceproperties.com>

Date Tue 1/27/2026 4:56 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Menard, Mathieu <MMenard@bellevuewa.gov>; Gallant, Kristina <KGallant@bellevuewa.gov>; Whipple, Nicholas <NWhipple@bellevuewa.gov>; Horner, Rebecca D <RHorner@bellevuewa.gov>

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

With respect to the amendment I requested below, note affordable housing strategy SD.2.3. This document will be presented to the Council next Tuesday.

SD.2.3 *HIGH-PRIORITY ACTION*	Enable building at heights that maximize wood frame construction and prioritize continuous, regular floorplates as a way to enable the construction of housing.	DS	Expanded	Long-term/Ongoing	City Code Change & Review	N/A	Direct/Medium

[a2ce0adc562a88ccb21d02b1ea08312d_B. Draft Affordable Housing Action Plan.pdf](#)

From: Kevin Wallace

Sent: Tuesday, January 27, 2026 12:20 PM

To: PlanningCommission <planningcommission@bellevuewa.gov>

Cc: Menard, Mathieu <mmenard@bellevuewa.gov>; Gallant, Kristina <KGallant@bellevuewa.gov>; nwhipple@bellevuewa.gov; Horner, Rebecca D <rhorner@bellevuewa.gov>

Subject: Agenda Item 8.a) HOMA

Dear Commissioners,

I want to thank staff for negotiating with me and other developers and property owners in downtown on the HOMA LUCA. While the new code imposes some burdens, there are enough benefits that the good outweighs the bad. If you're interested in the details I attached a memo that includes the proposals I discussed with staff and categorizes them by the items left unresolved and the many items where we reached agreement.

My only remaining request is to modify 20.25A.070.C.2.c.v as shown below. The provision allows midrise buildings that provide affordable housing to have unlimited floorplates. There are two elements to my requested changes:

- Increase height limit from 80' to 85'. The additional development flexibility (ADF) provisions already allow buildings in the perimeter overlays to be built to 95'. The height limit for midrise, wood frame buildings under the building code is 85', so an increase from 80' to 85' is consistent with the building code, yet still lower than the max height allowed in the overlays. At 80', many projects would have to eliminate a floor of housing or have cramped residential floor heights in order to use this benefit, making it much less likely that they would do so.
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If I understand staff correctly, they support this request but it did not get picked up in the Sixth Draft. I also did not see mention of it in the agenda packet, so I want to call it to your attention, remind staff about it, and ask that the code amendment get approved.

Other than this one request I support the code as drafted and encourage you to recommend it to the Council for adoption.

Thanks for your consideration of this request, and thanks again to the staff for your collaboration.

Chart 20.25A.060.A.4 by 25 feet; and

v. Exempt buildings that are both less than 80 feet in height and located in the Perimeter Overlay from the maximum floor plate above 40 feet requirements listed in Chart 20.25A.060.A.4.

85 feet or less

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

Nesse, Katherine

From: Justin Holmes <justin@firstwesternproperties.com>
Sent: Wednesday, January 28, 2026 8:36 AM
To: PlanningCommission
Cc: Whipple, Nicholas; Menard, Mathieu; imorrison@mhseattle.com; Jessica Clawson
Subject: HOMA Request for Refinements to Grocery Floor Area Incentive

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

Dear Chair and Members of the Planning Commission,

I'm writing in support of the Housing Opportunities in Mixed Use Areas (HOMA) legislation and encouraging the Planning Commission to refine the floor area incentive for grocery stores to make sure that it will be viable for future market-rate mixed-use projects by requiring it only for a fixed term. I'm the Managing Broker at First Western Properties, where I lead our leasing efforts for retail and shopping centers. For over 20 years, I've worked on leasing grocer and retail centers throughout the Puget Sound region.

The City's concept for providing floor area incentives for the development of grocery stores is a great idea. However, as currently proposed, the City requires owners and developers to sign a covenant that the grocery tenant remain in a specific location for the life of a project. That is a barrier for owners to meaningfully use this incentive.

A covenant requiring a grocery tenant to remain in a specific location in perpetuity introduces a meaningful constraint on long-term site planning and redevelopment flexibility. While grocery uses can be valuable anchors, permanently fixing both the use and location can limit the ability to adapt the property to evolving market conditions, tenant demand, and land-use priorities over time. In practice, this type of restriction can materially affect future redevelopment feasibility, site efficiency, and the overall highest-and-best-use. Flexibility is key to maintain a property's long-term viability, particularly in dynamic, high-growth markets like the areas of Bellevue that are covered by HOMA.

We recommend that the Planning Commission refine the grocery incentive to clarify that the grocery floor area must be provided for a fixed term that mirrors the **initial term of the grocer tenant like 10-25 years**. That ensures a grocer in the project but provides flexibility. Seattle's grocer incentive program uses this format, and it's a good solution.

I hope this perspective is helpful. Please feel free to reach out if additional clarification or context would be useful.

Justin Holmes
Partner | Managing Broker

First Western Properties – Tacoma, Inc.
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Nesse, Katherine

From: Jessica Clawson <jessica@mhseattle.com>
Sent: Wednesday, January 28, 2026 9:42 AM
To: PlanningCommission
Cc: Nesse, Katherine
Subject: HOMA 1-28-26
Attachments: HOMA 1-28-26.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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

Hi Kate and Planning Commissioners, please see my letter regarding HOMA. Thanks.

McCULLOUGH HILL PLLC

January 28, 2026

VIA ELECTRONIC MAIL

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

Re: HOMA Legislation – Request for Direction on Minor but Important Amendments

Dear Chair Khanloo and Members of the Bellevue Planning Commission,

Thank you for your thoughtful, diligent work advancing the HOMA legislation. The proposal is ready to be transmitted to the City Council, and we appreciate the Commission's leadership in bringing it to this point.

Before the legislation moves forward, however, we respectfully urge the Commission to provide direction on several minor—but meaningful—refinements. Because many of the applicable zoning provisions have not been amended in more than 30 years, and because neither the City nor the Planning Commission are likely to revisit them again soon, now is the appropriate and efficient moment to make these adjustments. There is no practical reason to defer them, and doing so now will help ensure the legislation achieves its intended goals.

The City Council relies heavily on the Planning Commission's expertise, and your guidance on these items will help Bellevue advance its vision of accommodating 35,000 new housing units and 70,000 new jobs over the next 20 years.

The recommended refinements are as follows:

- 1. Provide direction that office and non-residential uses should be incentivized—just as residential uses are—to participate in the fee-in-lieu program.**
Residential projects currently receive a 4:1 FAR bonus for participation, while non-residential projects do not receive a comparable opportunity. A modest 3% floor-plate addition is effectively imperceptible from the exterior and would help attract high-quality development at a time when regional conditions—particularly in Seattle—make Bellevue's competitiveness especially important. A fee-in-lieu without any commensurate benefit sends exactly the wrong message to the market at the wrong time. We provided suggested language in the PLUSH letter for your consideration. Please recommend adoption as-is.
- 2. Support the proposed 25-year covenant with an option to satisfy obligations through an affordable fee-in-lieu payment.**
This structure provides valuable predictability and encourages the commercial and grocery-oriented ground-floor uses the City wants. It mirrors Seattle's current approach in similar incentive legislation.

3. **Align the Land Use Code with the Building Code—specifically by adjusting 80 feet to 85 feet in Downtown and other areas where the height limit is currently 80 feet.** Aligning these codes is a logical housekeeping step and avoids practical discrepancies that complicate project design and reduce the ability for a project to provide more housing.
4. **Voice your support for the MFTE supercharger for mandatory housing.** Under current market conditions, only a limited number of projects—mostly in Wilburton—are financially feasible due to the Wilburton supercharger provision. If the City is serious about accelerating housing delivery, especially in the near term, its policies must consistently support development feasibility across all eligible areas in the short term. While this is not technically a planning commission item, it is important to raise the policy issue as part of your recommendation.

We greatly appreciate your service and your commitment to shaping a livable and economically vibrant Bellevue. Thank you for considering these minor items, and we hope you will support their inclusion before recommending the legislation to the City Council.

Sincerely,

/s/

Jessie Clawson
McCULLOUGH HILL PLLC

Nesse, Katherine

From: Amanda Keating <akeating@weberthompson.com>
Sent: Wednesday, January 28, 2026 9:45 AM
To: PlanningCommission
Cc: Whipple, Nicholas; Menard, Mathieu; Ian Morrison; Jessica M. Clawson (JCLAWSON@MHSEATTLE.COM)
Subject: Planning Commission letter - Weber Thompson Architects
Attachments: Bellevue Planning Commission_Weber Thompson letter_Jan 28 2026.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Planning Commission,
Attached please find a letter and diagram that I would like read into tonight's Planning Commission meeting. I will also speak in person during the public comment period of the meeting.

Thank you very much in advance!

Amanda

AMANDA KEATING AIA, LEED AP

Senior Principal
(she/her)

WEBER THOMPSON

A majority women-owned company & JUST organization

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WEBER THOMPSON

900 N 34th Street, Suite 200 | Seattle, WA 98103
206.344.5700 | weberthompson.com

Dear Chair and Members of the Planning Commission:

Thank you for your work on the HOMA code update and thank you in advance for considering two small revisions that support the goal of delivering more housing in Bellevue, especially in the Midrise Mixed-Use areas. As you know, the City's vision for these Midrise Mixed-Use areas is to "provide an area for a mix of housing, retail, service, office and complementary uses at a middle scale and density." As architects, we support this vision for middle-scale density, and have direct and extensive experience with this building type. Our recommendation is to ensure that the City's Land Use Code aligns with the Building Code and construction best practices for wood frame Type IIIA construction. This will help the City maximize the housing potential and construction efficiency in the new MU zones.

Generally, we request that the Planning Commission align the Land Use Code heights in the Midrise-Mixed Use zone, especially the new Mixed Use: 7 Story (MU7) zone being created, with established Building Code heights. Under the Bellevue (following the State) Building Code, the maximum height for podium (wood frame Type IIIA) buildings is 85 feet, but the new MU7 zone in the Land Use Code allows for only 80 feet.

The City can harmonize those two codes in support of more housing in these MU 7 zones by editing:

- LUC 20.10.325 – Mixed Use: 7 Story (MU7). I ask that you consider clarifying the "Mixed Use: 7 Story (MU7)" to "Midrise Mixed Use (MMU)" to match the Attachment D Future Land Use Map.
- LUC 20.20.010: Consider clarifying the Maximum Building Height to be revised from 80 feet (as currently drafted) to 85 feet. This slight change will align the Land Use Code with the Bellevue (and State) Building Codes, which restricts podium/midrise buildings to 85 feet in height.
 - 85 feet Maximum Building Height would allow for the full buildout of a "podium-style" Midrise Mixed-Use building while staying within Type IIIA wood construction height limits.
 - Adding an extra 5 feet will allow for another full floor of housing in these zones, while the current proposed 80 feet leaves housing capacity on the table that will never be realized.
 - 85 feet will still allow for a taller ground level that will support retail or non-residential uses.
 - As you can see in the attached diagrammatic rendering, the height, bulk and scale distinctions of the additional 5 feet in height to align with the Bellevue (and State) Building Code are imperceptible from a pedestrian perspective. Cities around the Eastside, including Kirkland, Redmond, and Issaquah, all have middle scale density zones in similar neighborhoods that establish an 85 foot height limit. We believe this minor change will go a long way to achieve the City's vision for the Midrise-Mixed Use zones over the next generations.

Thank you very much for your consideration, and I'm happy to answer any questions.

Sincerely,
Amanda Keating, AIA
Senior Principal, Partner
Weber Thompson Architects



Diagrammatic rendering of 85 feet height building in relation to 80 feet.



Comments for consideration- Jan. 28th meeting

From Emily Johnson <emily@bakalianlaw.com>

Date Wed 1/28/2026 2:13 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>; Nesse, Katherine <KNesse@bellevuewa.gov>

Cc Allan Bakalian <allan@bakalianlaw.com>; Menard, Mathieu <MMenard@bellevuewa.gov>

2 attachments (494 KB)

012826.CommentLtr.pdf; CommentLtr.121025.pdf;

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

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Good afternoon,

Please find attached comments submitted on behalf of Bellevue Redmond Professional Center, LLC.

Thank you,
Emily

Emily Johnson | Legal Assistant | BAKALIAN & ASSOCIATES P.S. | emily@bakalianlaw.com | 206-960-9214 | 8201 164th Ave NE, Suite 200, Redmond, WA 98052

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January 28, 2026

Via Email: planningcommission@bellevuewa.gov

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

**Re: January 28, 2026 Planning Commission Meeting
Comments to Proposed HOMA Land Use Code Amendments**

Dear Planning Commission Members:

We represent the Bel-Red Professional Center, LLC (BRPC), owner of a medical-dental office complex located at 15617 Bel-Red Road, Bellevue. We are formally submitting these comments on behalf of the BRPC, as a party of record, to the Bellevue Planning Commission for consideration at its January 28, 2026 Planning Commission meeting regarding the City of Bellevue's proposed Housing Opportunities in Mixed-Use Areas (HOMA) Land Use Code Amendments ("LUCA") to implement the City's 2024 updated Comprehensive Plan. We previously provided written comments to the Planning Commission at the December 10, 2025 public hearing (attached).

While my client supports thoughtful transitions between mixed-use and residential areas as provided for in Option A, which we support, the proposed standards include certain overly restrictive if not onerous requirements that do not adequately account for the existing site conditions, as described below. The following comments address the changes to the draft proposal since the Planning Commission's December 10 proposed LUCA and public meeting that evening.

First, we support the proposed increase in the impervious surface area to 85% in the NB district, a reasonable accommodation between the downtown and outlying areas.

Second, we believe the proposed 25 foot landscape buffer/setback from properties in a residential land use district be reduced to 'up to' 15 feet - where the adjacent residential structure is greater than 25 ft. from the property line. Accordingly, we suggest the 25 ft. buffer be reduced one foot for every two additional feet so that the residential structure is set back greater than 25 feet from the property line. For example, if a residential home is 40 feet from the property line, the setback would be 18.5 feet (reduced by 7.5 ft, half of the 15 feet additional residential struct setback).

Third, we continue to support the building height allowed in the proposed in Option A, but disagree that there should be a hard 25 foot stepback for buildings over 60 feet tall when the existing site conditions otherwise provide for sufficient buffer and there would be no or little impact to the adjacent residential properties. For example, there will be no additional benefit for sunlight by stepping a building at 60 feet when there are tall evergreens greater than 100 feet tall, such as the trees along the east BRPC property line. This existing landscaping already achieves the primary objectives of the proposed buffer requirement, including for sunlight, visual screening and neighborhood compatibility. The proposed amendments do not appear to provide sufficient flexibility to recognize such existing site features, which are functioning as intended and should be taken into consideration. Alternatively, the stepback itself should be reduced to 15 feet as initially proposed by staff.

In addition to the comments in our December 10 letter not otherwise addressed or modified following the latest proposal, we also continue to support eliminating or reducing the pedestrian oriented usage and frontage requirements for properties where such requirements are not likely to provide a commensurate public benefit (such as the proximity to pedestrian oriented businesses or residences), as such requirements may not be viable and unreasonably restrict the best use of such properties and buildings.

For these reasons, my client respectfully requests that the Commission consider revisions to the proposed amendments to allow for administrative relief, site-specific flexibility, or alternative compliance where existing setbacks and landscaping already achieve the intent of the regulations. This will ensure a better balance between neighborhood compatibility and reasonable development rights to create additional housing, and avoid unintended consequences or restrictions on future development.

Thank you for your consideration of these comments.

Very truly yours,

Allan Bakalian

Allan Bakalian

Cc: Ed Bolles, Bel-Red Prof Center LLC

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December 10, 2025

Via Email: planningcommission@bellevuewa.gov

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

**Re: December 10, 2025 Planning Commission Hearing
Comments to Proposed HOMA Land Use Code Amendments**

Dear Planning Commission Members:

We represent the Bel-Red Professional Center, LLC (BRPC), owner of a medical-dental office complex located at 15617 Bel-Red Road, Bellevue. We are formally submitting these comments on behalf of the BRPC, as a party of record, to the Bellevue Planning Commission for consideration at its December 10, 2025 public hearing regarding the City of Bellevue's proposed Housing Opportunities in Mixed-Use Areas (HOMA) Land Use Code Amendments ("LUCA") to implement the City's 2024 updated Comprehensive Plan.

The BRPC was developed in 1980, before there was any residential development in this area. It is located within the city's existing Neighborhood Mixed Use district, and is heavily treed on the east side, where the property abuts five residential homes. In general, the BRPC supports the City's efforts to increase the residential densities and building heights in this and other mixed use areas, including incentives for affordable housing. However, certain proposed amendments are not consistent with the Comprehensive Plan's goals to increase residential housing, or are overly restrictive. Accordingly, we request the planning commission reconsider certain restrictions in the proposed LUCA as it pertains to the BRPC, and other existing mixed use properties that abut residential properties currently set forth in both Strike Draft A and B, including the proposed "transition area" regulations (20.251.070). Specifically, we recommend that the Planning Commission adopt HOMA regulations that include:

1. Reducing the proposed 25 foot landscape buffer/setback from properties in a residential land use district to up to 15 feet, where the residential structure is greater than 25 ft. from the property line. We suggest the 25 ft. buffer be reduced one foot for every two additional feet the residential structure is set back greater than 25 feet from the property line. For

example, if a residential home is 40 feet from the property line, the setback would be 18.5 feet (reduced by 7.5 ft, half of the 15 feet additional residential struct setback).

2. Eliminating or reducing the requirement in 20.251.070.C(1)(b) that all significant trees with 15 feet of the abutting property be retained, subject to meeting the existing landscaping standards at 20.20.520.
3. Eliminating the additional 15-foot stepback for buildings over 80 feet when there are existing trees greater than 80 feet tall in the landscape buffer (transition standards 20.251.070(2)).
4. Increasing the allowable use of patios and similar ground features and trails in the landscape buffer area from 20 percent to 50 percent of such area.
5. Allowing driveways or fire vehicle lanes within the 25 foot buffer with adequate landscaping.
6. Incorporating the residential buffer/setback area in the impervious surface area calculations.
7. Incorporating the residential buffer/setback area in the building's footprint calculations.
8. Eliminating the pedestrian oriented usage and frontage requirements for properties that are over one thousand feet from an existing retail/commercial property, as such requirements may not be viable and would reduce otherwise available affordable housing on the ground floor.

Thank you for your consideration of these comments.

Very truly yours,

Allan Bakalian

Allan Bakalian

Cc: Ed Bolles, Bel-Red Prof Center LLC



HOMA

From da626rr@aol.com <da626rr@aol.com>
Date Wed 1/28/2026 4:39 PM
To PlanningCommission <PlanningCommission@bellevuewa.gov>

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To the Planning Commission:

I am a longtime resident of Newport Hills and would like to comment on HOMA as it applies to our neighborhood. This is not a good fit here for many reasons, including:

- 1) The lack of on-street parking.
- 2) Heavier traffic through the neighborhood that already gets badly congested.
- 3) The fact that there are only three ways to access Newport Hills contribute mightily to the already traffic congestion here.
- 4) The issues with the power grid. Newport Hills' power tends to go out frequently during heavy storms and the last to come back on. I asked PSE why that is and still they have yet to respond.
- 5) Resident safety, especially in case of natural disasters. What will be the end result if we need to evacuate the area, and what issues will first responders encounter trying to gain access to the neighborhood, if necessary?
- 6) Environmental concerns: I have seen just in the last few years bears, coyotes, deer, and raccoons walking down streets and beneath the powerlines. Will HOMA continue to take away more areas they live?

Also, there is the issue of doing a complete and thorough outreach. Many neighbors I've talked to are still not aware HOMA is in the planning stage. If outreach within the immediate impacted community is poor, then many important perspectives are excluded. Thus, if outreach is flawed, then data extracted from responses will be skewed and biased. The actual process used for this outreach make it appear that the communities the Planning Committee contacted for feedback was a cherry-picking expedition.

I would think it would be a good idea to start with an improved and more thorough and inclusive outreach effort. I discussed this with our mayor, and he agreed that city outreach methods need improvement.

I ask we please solve the affordable housing issue through collaboration with impacted communities, not exclusion.

You must be transparent and give the immediate communities most impacted the loudest voice!

I recently found this reader comment published in The Seattle Times on 1/4/26 that is relative to what is going on with HOMA:

"...upzoning largely created the astronomical (housing) prices we see today...Upzoning and reduced regulation can never create affordable housing, because housing development is a for-profit industry, and there is no profit in affordable housing..."

"But politicians love upzoning because it costs nothing. For zero (city) costs they can pretend they have done something to the homelessness issue and campaign donations from developers and the building associations pour in."

Let's not make this mistake. HOMA may work in some neighborhoods in Bellevue, just not Newport Hills. Slow this process down and take the time to do what's best for all, not just for realtors and those who'd like to live here.

Thank you.

Darrell Tsukiji



Jan 28 PC comment letter

From Allan Bakalian <allan@bakalianlaw.com>

Date Wed 1/28/2026 5:41 PM

To Khanloo, Negin <NKhanloo@bellevuewa.gov>; Lu, Jonny <JLu@bellevuewa.gov>; Goeppeler, Craughton <CGoeppeler@bellevuewa.gov>; Kennedy, Mariah <MKennedy@bellevuewa.gov>; Ferris, Carolynn <CFerris@bellevuewa.gov>; Nilchian, Arshia <ANilchian@bellevuewa.gov>; avillaveces@bellevuewa.gov <avillaveces@bellevuewa.gov>; PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Menard, Mathieu <MMenard@bellevuewa.gov>; Ed Bolles <bolsey@msn.com>; Emily Johnson <emily@bakalianlaw.com>

2 attachments (486 KB)

012826_SupplementalCommentLtr.pdf; CommentLtr.121025.pdf;

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To the Bellevue Planning Commission members,

Attached is a copy of the supplemental comment letter submitted to the planning commission staff this afternoon. We greatly appreciate your time to review and consider these comments and concerns before discussion at the study session and subsequent potential vote this evening. I will also provide a brief oral summary/testimony.

Thank you for your consideration.

Sincerely,
Allan Bakalian
Counsel for the Bel-Red Professional Center

Allan Bakalian | BAKALIAN & ASSOCIATES PS | allan@bakalianlaw.com | 425-985-6527

8201 164th Ave. NE, Ste. 200, Redmond, WA 98052

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January 28, 2026

Via Email: planningcommission@bellevuewa.gov

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

**Re: January 28, 2026 Planning Commission Meeting
Comments to Proposed HOMA Land Use Code Amendments**

Dear Planning Commission Members:

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While my client supports thoughtful transitions between mixed-use and residential areas as provided for in Option A, which we support, the proposed standards include certain overly restrictive if not onerous requirements that do not adequately account for the existing site conditions, as described below. The following comments address the changes to the draft proposal since the Planning Commission's December 10 proposed LUCA and public meeting that evening.

First, we support the proposed increase in the impervious surface area to 85% in the NB district, a reasonable accommodation between the downtown and outlying areas.

Second, we believe the proposed 25 foot landscape buffer/setback from properties in a residential land use district be reduced to 'up to' 15 feet - where the adjacent residential structure is greater than 25 ft. from the property line. Accordingly, we suggest the 25 ft. buffer be reduced one foot for every two additional feet so that the residential structure is set back greater than 25 feet from the property line. For example, if a residential home is 40 feet from the property line, the setback would be 18.5 feet (reduced by 7.5 ft, half of the 15 feet additional residential struct setback).

Third, we continue to support the building height allowed in the proposed in Option A, but disagree with the “Transition Requirements” for buildings over 60 feet tall as described in the Option A strikeditdraft (e.g., BCC 20.251.070; Attachment A to the January 28, 2026 Planning Commission Study Session Memo). The proposed 45-degree daylight plane “stepback” is overly restrictive and impracticable. Any such stepback should first be measured from the building’s actual setback from the adjacent residential property boundary, which may be less than 25 feet as we recommended above. In addition, the “stepback” requirement for buildings over 60 feet tall should not be mandatory; rather, it should be discretionary based upon factors that include, at a minimum, the distance between a residential structure and the building’s actual setback, the presence and height of the existing and retained trees in the buffer area (which may be taller than the building itself) and the potential for future development of adjacent residential parcels at the time the new building development application is submitted, to allow for consideration of future changes to the surrounding residential properties.

This will ensure that property owners are not denied a right to fully develop their property and increase the available residential units in their project when there is no corresponding public benefit, such as when the existing site conditions otherwise provide for sufficient buffer or there would be no or little impact to the adjacent residential properties. In short, there needs to be greater flexibility in the transition zones that recognize the existing site features or otherwise achieve the City’s primary objectives for sunlight, visual screening and neighborhood compatibility.

In addition to our December 10 comments not otherwise modified by this letter, we continue to support eliminating or reducing the pedestrian oriented usage and frontage requirements for properties where such requirements are not likely to provide a commensurate public benefit, such as the existing proximity to pedestrian oriented businesses or residences or when such uses may not be viable and unreasonably restrict full residential use of such properties and buildings.

We therefore request that the Commission consider revising the proposed code amendments to allow for administrative relief, site-specific flexibility, and discretionary factors regarding the existing site features and surrounding properties. This will ensure a better balance between neighborhood compatibility and reasonable development rights to create additional residential housing while avoiding intended or unnecessary restrictions on future development.

Thank you for your consideration of these comments.

Very truly yours,

Allan Bakalian

Allan Bakalian

cc: Ed Bolles, Bel-Red Prof Center LLC

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Allan B. Bakalian
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December 10, 2025

Via Email: planningcommission@bellevuewa.gov

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

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Thank you for your consideration of these comments.

Very truly yours,

Allan Bakalian

Allan Bakalian

Cc: Ed Bolles, Bel-Red Prof Center LLC