



# Bellevue Planning Commission

January 28, 2026

## PLANNING COMMISSION STUDY SESSION

### **SUBJECT**

Study Session on the Housing Opportunities in Mixed-Use Areas (HOMA) Land Use Code Amendment (LUCA).

### **STAFF CONTACTS**

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### **POLICY ISSUES**

The City adopted an updated Comprehensive Plan in the fall of 2024. The Comprehensive Plan sets a goal of 35,000 new housing units and 75,000 new jobs by 2044 and emphasizes the creation of new housing opportunities throughout the City; increasing walkability and multimodal transportation options; and creating vibrant neighborhood centers. This LUCA will implement updated policies in the Comprehensive Plan and align development regulations with the land use designations in the Future Land Use Map (FLUM). The LUCA touches on many aspects of the Comprehensive Plan, especially the Housing, Land Use, and Urban Design Elements.

Additionally, the City has adopted a target to create 5,700 affordable housing units between 2026-2036. The LUCA will assist the City in achieving this goal by creating a new affordable housing program in the mixed-use areas covered by this LUCA scope.

### **DIRECTION NEEDED FROM THE PLANNING COMMISSION**

#### **ACTION**



#### **DIRECTION**



#### **INFORMATION ONLY**



On December 10, 2025, the Planning Commission held a public hearing to consider the proposed LUCA. Tonight, staff request that the Commission recommend approval of the proposed LUCA.

### **BACKGROUND/ANALYSIS**

#### **Housing Opportunities in Mixed-Use Areas (HOMA) Background**

The Planning Commission has reviewed and discussed the HOMA LUCA in four study sessions and at a public hearing held on December 10, 2025. The staff report, which provides background information, outlines the review process, and evaluates how the LUCA options meet the decision criteria, is included as Attachment A.

A strike-draft of the LUCA outlining the mandatory inclusionary affordable housing approach (staff recommendation) is provided as Attachment B, and a draft of the voluntary approach for the LUCA is included as Attachment C.

## **December 10, 2025 Public Hearing Summary**

The Planning Commission public hearing was held on December 10, 2025, to hear comments from the public and further discuss the LUCA. There were a significant number of comments at the public hearing, generally focusing on the Newport Hills area, Downtown, impervious surface limits, pedestrian-oriented use requirements. The Planning Commission discussion centered around these topics and the proposed transition requirements. Additionally, the Planning Commission requested that staff explore further changes to the LUCA requested by the Bellevue Chamber of Commerce's PLUSH Committee (PLUSH). Many of the PLUSH requests relate to Downtown, impervious surface limits, and pedestrian-oriented uses. A table detailing the PLUSH comments and staff responses can be found as Attachment D.

## **Draft Updates**

Changes to the strike draft relating to impervious and hard surface limits, pedestrian-oriented use requirements, Downtown and transition requirements have been made based on the input received by the public and Planning Commission at the December 10, 2025, public hearing. These changes are detailed below.

### *Impervious and Hard Surface Limits*

At the public hearing, members of the development community and the PLUSH comments requested increases to the impervious surface and hard surface limits contained in LUC 20.20.010. Impervious surfaces are areas that prevent water infiltration, such as buildings and parking lots. Hard surfaces allow for some water infiltration, such as green roofs and permeable pavement.

The current code generally limits impervious surface to 60-65 percent of the total lot area and hard surfaces to 85 percent. Commenters noted that these standards reflect suburban standards that are inconsistent with the intent of HOMA to encourage higher-density housing in mixed-use areas.

In response, the LUCA was updated to increase the impervious surface limit to 85 percent in lower-density districts (O, NB, CB and OLB) and 95 percent in higher-density districts (OLB2, NMU, MU7, MU16, EG-TOD, F3 and F1). The hard surface limit is proposed to be increased to 95 percent in lower-density districts and 100 percent in higher-density districts.

Sites will continue to be required to meet the tree code standards as well as local and state stormwater management regulations. Additionally, staff has coordinated with the Utilities Department to ensure these changes will not adversely affect the City's ability to manage stormwater and runoff from private property.

### *Ground Floor Use Requirements*

Comments at the public hearing expressed concerns that the required pedestrian-oriented uses (POUs), are overly onerous for certain sites. Alternatively, resident stakeholders have stressed the need for neighborhood serving commercial uses in these same areas. To maintain consistency with the Comprehensive Plan, which designates these areas as neighborhood commercial centers, no changes are proposed to the required linear frontage of 50 percent POUs in the NB and CB Districts and 66 percent in the NMU, MU7 and MU16 districts.

Many of the areas affected by HOMA serve as the only locations for meeting residents' day-to-day needs within walking distance and currently contain abundant commercial uses. For this reason, staff

does not recommend reducing the POU requirements. Instead, to address concerns raised by the development stakeholders, additional flexibility on the location and provision of POUs is detailed below and can be found in Land Use Code (LUC) 20.25I.050.A.2-3.

- Allowing up to 15 percent of the required POUs to be located within the interior of the site, as long as the POU is adjacent to a publicly accessible plaza that is adjacent to, and at the same grade as the sidewalk.
- Revising the departure language to allow properties on collector arterials and non-arterials to qualify and removing the requirement that properties not be visible to the adjacent neighborhood.
- Adding a departure option to modify the POU requirements when uses that promote pedestrian activity in the public realm are provided and no more than 50 percent of the units are townhouses.

### *Downtown*

At the Public Hearing, the Commission heard a significant number of comments and proposed changes related to Downtown, especially from development groups and PLUSH. Staff met with Downtown stakeholders on January 7 and 9 to discuss HOMA and proposed changes to the Downtown code. Based on the comments received from PLUSH and other Downtown stakeholders, several changes are proposed to the HOMA strike draft as detailed below.

- **Minor clarifications:** PLUSH requested minor clarifications to language related to the affordable housing FAR exemption (LUC 20.25A.070.C.2.a) and outdoor plaza requirements (LUC 20.25A.070.D.4(6) and 20.25A.075.B.3.b). These edits are intended to clarify language and intent for future applications and do not change any standards or requirements.
- **Sustainability certification assurance device:** The current Downtown code requires a performance bond before a project can receive amenity incentive points for utilizing sustainable building techniques such as LEED certification. Other sections of the code point to LUC 20.20.420, which allows the Director to determine an appropriate assurance device. To align with the broader code and provide flexibility, the LUCA has been revised to reference LUC 20.20.420 rather than requiring a specific assurance device for Downtown projects.
- **Green and sustainability factor:** All Downtown developments are required to meet a green and sustainability factor threshold based on the ratio of qualifying green features (weighted by multipliers) to total lot area. PLUSH requested that certain required vehicular access and parking areas be excluded from the total lot area used in the calculation, consistent with the approach in Wilburton. Staff has made this change in LUC 20.25A.120.A.4.
- **Compact Parking:** The existing Downtown code allows up to 65% of the required parking stalls to be compact through an administrative departure process. PLUSH requested that up to 65% be allowed by right. Staff supports this change as we routinely approve such departure requests.
- **Landscape Buffer:** Currently, the Downtown code requires a five-foot landscape buffer for vehicular access or parking for front property lines in the DT-O-1, DT-O-2 and DT-OB Districts and for all property lines in other Downtown districts (LUC 20.25A.110.B.2). As many projects downtown span multiple properties this requirement is creating a situation where projects are being required to provide a landscape buffer internal to the project limits. The proposed

language standardizes the requirements throughout Downtown by eliminating the requirements for the buffer alongside and to the rear of property lines.

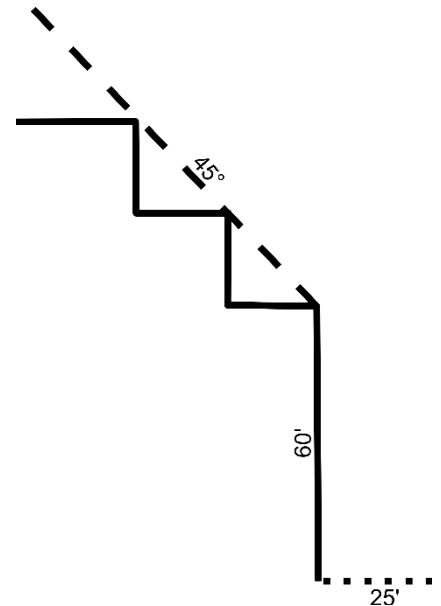
#### *Transition Requirements*

At the public hearing, the Planning Commission raised concerns related to the proposed transition requirements, especially for buildings over 60 feet tall. Updated transition requirements have been provided in the strike draft, Section 20.25I.070 (Attachment A).

Staff proposes requiring:

- A 25-foot landscape buffer between any mixed-use district and adjacent residential districts; and
- A 45-degree daylight plane beginning 25 feet from the property line and 60 feet above grade.

This would require all structures above 60 feet in height to step back from the adjacent property (see: Figure 1). For example, an 80-foot-tall building would have to step back an additional 20 feet from the property line.



**Figure 1:** Transition and Daylight Plane Requirements

#### **Vesting**

Throughout the HOMA process, development stakeholders have raised concerns related to vesting for Downtown projects that are currently working through the permitting process. It is also important to note that the opposite situation occurred in Wilburton, where pipeline projects vested under the existing code sought to take advantage of new provisions introduced through the Wilburton LUCA. This highlights that vesting issues can arise in both directions, depending on whether code changes are perceived as more or less favorable to development.

The Wilburton LUCA ordinance allowed projects in permitting to choose either the pre-LUCA code or the updated code, but required them to apply the selected code in full, without cherry-picking provisions. Staff has committed to discussing a similar option with City Council as part of the HOMA adoption process. Draft ordinance language intended to address this issue is provided below for reference only and will be reviewed by the City Council prior to adoption.

The draft ordinance language is intended to clarify how pending discretionary land use applications in Downtown Land Use Districts will be handled after adoption of the HOMA LUCA. In general, applications deemed complete before the effective date of the HOMA ordinance would continue under the prior Land Use Code, while preserving any vested rights established under existing law or the Downtown FAR Interim Official Control. The language will also provide a voluntary, time-limited option for applicants with pending design review applications and no complete building permit to elect review under the new Land Use Code HOMA provisions, without otherwise changing procedural review requirements. Exact ordinance language will be provided to Council in advance of their review of the Planning Commission recommendation on the HOMA LUCA.

#### **Public Engagement**

Staff has executed a public engagement plan with three modes of outreach to ensure the public, stakeholders, and interested parties have the opportunity to be informed and to provide comments.

1. Process IV Requirements. Process consistent with Chapter 20.35 LUC procedural requirements to provide opportunities for public comment.
2. Direct Engagement and Feedback. Dialogue with community and stakeholders has been ongoing.
3. Online Presence. City webpage and StoryMap to provide opportunities for the public to stay informed and to request additional information.

### **LUCA Schedule**

The Planning Commission will be asked to recommend the proposed LUCA tonight. The anticipated schedule for this LUCA is as follows:

- Council Initiation: December 12, 2022
- Council Scope Update: December 10, 2024
- PC Study Session 1: February 26, 2025
- PC Study Session 2: May 14, 2025
- PC Study Session 3: September 10, 2025
- PC Study Session 4: October 8, 2025
- PC Public Hearing: December 10, 2025
- PC Study Session 5: January 28, 2026
- City Council Study Session (to be scheduled)
- City Council Action (to be scheduled)

### **ATTACHMENTS**

- A. Staff Report
- B. Option A Strike Draft (mandatory approach)
- C. Option B Strike Draft (voluntary approach)
- D. PLUSH Comments and Staff Responses
- E. Planning Commission Resolution