

TECHNICAL MEMORANDUM

Date:	September 15, 2025
To:	Kirsten Mandt, Kristina Gallant
From:	Nell Lund, Senior Ecologist Doug Yormick, Environmental Planner
Project Name:	Bellevue CAO Update
Facet Number:	2411.0456.00

Bellevue CAO Update - Public Outreach Summary

To date, the following events have been conducted by City Planning staff with support from Facet to inform the public about the in-process Critical Areas Ordinance (CAO) update and gather community feedback. Each event is briefly summarized below. The City is also hosting a webpage with information and updates on the CAO update. Critical Areas Ordinance Update | City of Bellevue

Event	Date
EarthFest 2025	April 19, 2025
Open House/CAO Workshop 1 (in-person)	June 16, 2025
Open House (virtual)	July 7, 2025
CAO Workshop 2	July 23, 2025
Information Session (on-line)	August 7, 2025
Bellevue Development Committee meeting	August 13, 2025

EarthFest 2025

Bellevue Planning set up a booth at EarthFest 2025. Since that event was at the start of the CAO update process, the City shared general information about the CAO update and timeline. The introduction poster (Exhibit 1) and postcards (Exhibit 2) provided a QR code for the project webpage. Comment cards were also collected.

Open House / CAO Workshop 1

The open house was held at Bellevue City Hall. Approximately thirty people attended the in-person open house. The City presented an overview of the CAO update requirements and current project status. Posters for each critical area type were on display and facilitated discussion on topics of interest and concern with attendees. An interactive poster board was used to collect comments from attendees.

Comments received covered the following topics:

- Wetland and habitat protections are important to residents
- Concern about stormwater infrastructure maintenance and wetland implications
- Concern about wetland buffer/setback widths. What is the science behind the widths?
- Streams pollution concerns, including tree preservation in riparian areas for shade
- Critical Aquifer Recharge Areas (CARA) Keep water clean, plastics and toxins are a concern
- Add robust CARA regulations
- Restoration only happens if sites redevelop
- Frequently Flooded Areas Housing concerns
- Permit Process Performance based urban stream code

Open House (virtual)

The virtual open house followed the same format as the in-person open house. Approximately forty people attended the virtual open house. City staff and Facet presented an overview of the CAO update and posters were shared digitally. During the question-and-answer session comments received covered the general topics below.

- How does the CAO update and associated buffer requirements relate to middle housing?
- Stream regulations concerns about how Site Potential Tree Height (SPTH) is determined;
 Facet described WDFW Riparian Ecosystems Volume 1 best available science (BAS) and
 Volume 2 recommendations. Either the online WDFW mapping can be used, or a site-specific study can be done using WDFW methodology.
- Middle housing Concern about wetland buffer widths. Will flexibility apply to wetland buffers on large sites being developed for middle housing?
- Streams and wildlife corridors Interested in seeing salmon bearing streams restored and wildlife corridors incorporated.
- Constructed steep slopes Will the code regulated constructed steep slopes differently than natural steep slopes?
- Wildlife corridors Interest in a city-wide proactive approach to supporting safe wildlife passage



- Steep slopes Concern about safety on sites targeted for increased growth and infrastructure needs adjacent to steep slope hazards; concern about existing nonconforming uses and requirements for changes to those sites
- Cultural Resources / consultation with tribes Interest in more coordination with tribes to protect resources

CAO Workshop 2

This memo summarizes the key themes raised during recent public engagement efforts on the Critical Areas Ordinance (CAO) update. The feedback reflects a range of community interests and concerns related to the City's approach to environmental protection in the context of growth and redevelopment.

SUMMARY OF PUBLIC COMMENT THEMES

1. Stream Protections and Buffer Modifications in the Context of Housing Growth

- Middle Housing Impacts: Community members raised questions about recent buffer clearing associated with middle housing and whether additional clearing will be permitted in future phases.
- Buffer Flexibility for Larger Parcels: There were inquiries about whether large sites constrained by buffers would be granted more flexibility under updated standards.
- Stream and Potentially Connected Habitat (SPTH): Clarification was requested on how SPTH is determined and whether it would apply citywide or be assessed on a site-by-site basis.

2. Wildlife Corridors and Habitat Connectivity

• Residents emphasized the importance of planning for and preserving wildlife corridors, especially across private parcels. Multiple commenters noted increased wildlife activity in urban areas and the need to proactively support habitat movement through the city.

3. Steep Slopes and Constructed Features

- Several community members asked whether manmade steep slopes will be regulated differently than natural slopes, and if so, how reporting or mitigation requirements will differ.
- There were also questions about how nonconforming structures located on steep slopes will be treated under the updated ordinance.

4. Transparency, Communication, and Interagency Coordination

- Participants expressed interest in having a dedicated "hot topics" section on the City's critical areas webpage, including a timeline and key decision points.
- There were questions about how technical studies (e.g., geotechnical, habitat assessments)
 inform staff decisions and whether King County is notified of critical area impacts occurring
 within the City.



5. Ecological Function and Cumulative Impacts

• Commenters requested clarity on how the City measures ecological function, both on individual sites and cumulatively across the city, as CAO changes are implemented.

6. Cultural and Indigenous Resource Considerations

• One commenter asked whether Bellevue's CAO recognizes areas that are culturally significant to Indigenous peoples and how such areas are evaluated in permitting decisions.

Information Session

The virtual information session consisted of a presentation followed by a question and answer discussion. Approximately fifteen people attended the information session. The City presented an overview of the CAO update requirements and current project status. Questions and feedback touched on the topics below.

- Coordination with other resources / subject matter experts beneficial (e.g. King County Conservation District, stream team, University of Washington)
- Stream buffer and setback widths general interest in the code updates and how property uses are impacted
- Mapping Critical areas mapping resources to help property owners understand their site conditions
- Concern about increased housing near ravine / Cougar Mountain in the Lakemont area
- Steep slopes / Landslide hazards Concern about past slides, need to keep residents safe
- Climate Change Is the City considering climate change in this update? Yes, see Best Available Science Review (Facet 05-2025). Vegetation requirements for buffers are also planned to support shading and microclimate conditions.
- Variances Concern about applying variances too broadly
- Wildlife Concern about protecting wildlife corridors and avoiding actions that move wildlife into developed areas.
- Land use and critical area protections Interest in protecting critical areas regardless of location (e.g. within a public transit zone)

Bellevue Development Committee Meeting

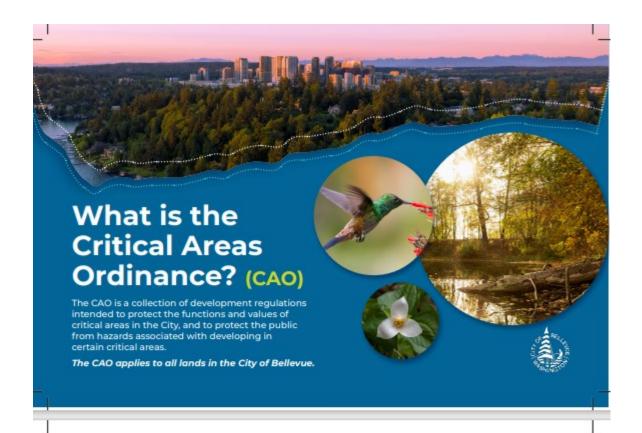
The City invited Facet to join the August 13, 2025 Bellevue Development Committee (BDC) meeting. City staff gave the BDC the same presentation shared in the virtual information session. The presentation was followed by information about the Bel-Red area and break-out group discussions. Feedback received focused on urban streams, flexibility/incentives for restoration and low impact design (LID) approaches. The topic of how to regulate natural steep slopes versus constructed steep slopes was also raised.





Exhibit 1. Introduction Poster – CAO Update





What is the purpose of the CAO update?

Every ten years, Washington's GMA requires critical area updates using the Best Available Science to protect sensitive environments. The state identifies five types of critical areas that must be designated and protected:

- » Wetlands
- » Fish and wildlife habitat conservation areas
- » Geologically hazardous areas
- » Frequently flooded areas
- » Critical aquifer recharge areas

The periodic update lets the City incorporate current science to better protect critical areas. Bellevue's CAO was last fully updated in 2016, with minor updates in 2018 and 2020. The current periodic update must be completed by December 2025.



For more information scan the QR code:

Exhibit 2. CAO Update postcard

