

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

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20.25B	General Applicability to BelRed	Confirm what the definition of small site is in Bel-Red and how does it work?	The current definition established in 20.50 will apply: "A lot in a Mixed-Use Land Use District, established under LUC 20.10.020 and described in LUC 20.10.398, and in existence prior to January 1, 2025, that is less than or equal to 40,000 square feet in area and corresponds to the project limit within which the small site is located. This definition does not apply to lots less than 40,000 square feet in area that are aggregated into a project limit that is greater than 40,000 square feet."	No change proposed
20.25B	General Applicability to BelRed	Confirmation of building overhangs over sidewalks. Current interpretation in Wilburton is that "building cantilevers cannot be constructed over public ROW," which City is interpreting to include sidewalks in private ownership subject to a public easement. This is different from downtown and should be clarified.	Under the current code, buildings can cantilever over sidewalks in private ownership subject to a public easement. There are cases where the sidewalk is owned and maintained by the City but is located on private property.	No change proposed
20.25B	General Applicability to BelRed	Should also clarify loading and trash/recycling standards and ensure they are fixed. We understand there was a problem here.	20.20.725 LUC establishes standards for recycling and solid waste collection areas, including conditions for using temporary staging areas.	No change proposed
20.25B.010	Departures	D. Support departures for all dimensional standards in the code, including in Ch. 20.20.	Current draft maintains Wilburton approach, which allows administrative departures for many numerical standards. In lieu of expanding departures further, prefer suggestions of items which are recurring departure requests which may require a code fix, or suggestions of ways to build in more targeted flexibility.	No change proposed
20.25B.030	Stream Restoration and Green Factor	Site daylighting or restoring a stream under the CAO should be exempt from Green Factor or have a multiplier of 2x or more. Delete the word "required" from the second sentence of 20.25B.030.C.2.d. The 0.3 ratio is based on a normal building footprint without driveways or parking areas, and this is true whether the driveway or parking area is required by the city or not.	Critical areas and their buffers are already exempt from the Green Factor, added clarifying language to note that this includes daylight streams.	Complete
20.25B.030	Weather Protection	D.4. Canopy requirements need more clarity. What is required depth? What is the purpose and scope? This could be big cost. Refine language to ensure intent remains clear.	Applying minimum depth of 6 feet, consistent with downtown. May need to be increased when higher weather protection is provided, also addressed in this subsection.	Complete
20.25B.040	Building Design	Make explicit that floorplates are unlimited for all buildings under 100' tall. Define "Towers" as buildings greater than 100'. (Or confirm you agree the existing definition in 20.50.048 makes this clear.)	We confirm that 20.50 LUC definition of "Tower" will apply: "Any building with a minimum height of 100 feet or greater"	No change proposed
20.25B.040	Building Design	Section B.5 – Façade Modulation: include a depiction to provide clarity so projects don't get hung up in ADR. This section needs some additional review/examination. If you're set back 15'1" from the public right of way is modulation required? Why 60' vs. 85'? Exempt midrise? Why is c. only applicable to mass timber? The language in b suggests a 15' setback exempts all buildings.	Current draft maintains Wilburton approach, only changes are to reflect updates needed for consistency with state law (HB 1183).	No change proposed
20.25B.040	Building Design	Section C.4 – Mechanical Equipment Screening. Screening from above should only apply to mechanical equipment located less than 85' in elevation. A 250' building should not have to do overhead screening on the roof.	Land Use staff recommend retaining this requirement as established practice in the city. Screening options include simply painting to match, which seems reasonable.	No change proposed
20.25B.040	Building Design	In C.4.b and C.4.a – Remove the phrase "in order of preference" in list of options for screening mechanical equipment. This is arbitrary and will create plan reviewer issue in ADR.	Removed. This provides additional flexibility for screening from above, as noted in previous comment.	Complete
20.25B.040	Building Design	D.2.a – Parking Structures: Remove "All above-grade floors of a parking structure shall be horizontal with a floor-to-ceiling height of at least 10 feet to accommodate future adaptive reuse of the space, except for ramps providing circulation between floors."	We anticipate that parking demand will decrease in years ahead, and see this as a reasonable standard to help enable the conversion of parking structures to occupiable space in the future.	No change proposed
20.25B.040	Tower Separation	Maintain 50' tower separation instead of applying Wilburton 60' separation.	Maintaining Wilburton standard. The Wilburton standard is also consistent with Downtown.	No change proposed

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20.25D.015 Or 20.50.046	BelRed Overlay Definitions S Definitions	Define the "Street Grid" as the walkable, bikeable network created by the 1,200-foot maximum block lengths.	"Street Grid" is not a term informing any regulations in the code. There are standards for the area subject to block limits, and there are defined local street and green street segments.	No change proposed
20.25D.020	Local Streets	How are sites impacted by both critical areas and the street grid treated?	The number of defined required segments has been reduced, and included removing segments which were problematic due to known critical area interactions. The updated CAO also provides additional flexibility for development on sites with degraded critical areas.	No change proposed
20.25D.020	Local Streets	Main concerns: these local streets are not needed from a transportation perspective, so how is staff determining which local streets remain? Why not just use the block size limit to solve this, and quit trying to prescribe street locations? These standards will make it less likely that properties redevelop, not more.	The statement that local streets are not required from a transportation perspective only refers to the system level. The local street grid is required to ensure access is available throughout BelRed as development proceeds, and that individual parcels can develop without creating access issues for their neighbors. The public local grid has been reduced to those segments staff recommend as being most important to ensure certainty around access, as well as important east-west Green Street connections.	No change proposed
20.25D.020	Access Corridors	The Active Transportation and Service Corridor are good typologies, but the code should add 1) clarification that typology is up to applicant unless a mapped street; 2) orientation of the corridor is completely up to applicant so long as dimensions, block length and intersection standards are met; and 3) need to add a third typology for Pedestrian Oriented Connection or Bike Path – that is 14 feet like Wilburton and not required for emergency access.	The draft has been updated with a new Enhanced Shared Use Path. This includes a minimum 14 foot shared path, with additional amenity zone required. The path can only be used to frame a block where emergency access is not required.	Complete
20.25D.020	Local Streets	Intersection concerns should be handled via design rules, not in prescribed locations. Safe intersection can be achieved without full street alignments by enforcing Right-In/Right-Out (RIRO) vehicular access and establishing minimum curb-cut spacing from arterials.	Language has been softened around intersection alignments. Transportation is willing to consider adjustments to intersection layouts, however applicant must work with the city to analyze and resolve potential impacts.	Complete
20.25D.020	Access Corridors	Plazas should also be able to function as shared use paths if they meet the minimum standards.	New Enhanced Shared Use Path has provisions for a path to also be considered an outdoor plaza when achieving established design standards for outdoor plazas.	Complete
20.25D.020	On-Street Parking	Eliminate the need for on-street parking along some portions of streets to enhance the pedestrian experience. How will specific design elements be negotiated with transportation?	On street parking is now limited to only being required with local streets and green streets. Language in the draft also provides for flexibility on on street parking. Open to additional suggestions and ideas.	Complete
20.25D.020	Local Streets	Instead of prescriptive street grid standards, include design standard to prohibit the creation of trapped parcels. If a development creates a trapped parcel, resolve through standard Cross-Access Easements and Shared Access Easements, instead of mandating costly roads.	While possible, requiring the reduced grid provides greater certainty. Dedicated public streets also provide more consistent outcomes for future road maintenance and public access, among other benefits. It is difficult to anticipate and resolve all potential access conflicts through easements across the district.	No change proposed
20.25D.020	Local Streets	New street typologies are good for flexibility but need to add the shared use path; no emergency vehicles.	Added a new "Enhanced Shared Use Path". Also provide the opportunity for these paths to qualify as outdoor plazas under the amenity incentive system when achieving all design criteria while maintaining 14 feet travel lane throughout.	Complete
20.25D.020	Access, Blocks, and Circulation	If there are two sites with existing buildings, and the existing buildings are separated with 9 feet of distance, what happens when one site redevelops? Will the result be an interim street built close to the existing building on the other site?	Yes, interim streets would be the solution. The first site to develop would build an interim street along the property line.	No change proposed
20.25D.020	Local Streets	Codify flexibility in street implementation within master-planned projects. In certain cases, rigid application of the grid may conflict with feasible building layouts. Removing the local street requirements from our site and generally allowing flexibility where projects deliver strong urban design outcomes would help ensure development can occur while still meeting connectivity objectives.	Staff will discuss considerations for replacing public streets with private streets at the first study session.	In Progress
20.25D.020	Access Corridors	Allow use of a woonerf-style pedestrian street to frame blocks	This is possible with established private access corridors, though not currently possible for defined local street segments.	No change proposed

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20.25D.020.B	Access, Blocks, and Circulation	One challenge described is understanding whether or not a pedestrian connection would apply to a site, it might not have connectivity but would be subject to block length requirements. Consider allowing sites with certain frontage length or less are not required to provide that connection, or in cases when adding it would be over X percentage of the property. Is it fair or possible to add flexibility here?	Believe that reducing the number of required segments and providing additional language around flexibility should resolve such issues, but please bring remaining cases forward.	No change proposed
20.25D.020.B.1.b	BelRed Street Network	What does "generally consistent" mean in this section?	It means that, while the specific segment must be provided, there can be flexibility around its precise location. This flexibility depends on the specifics of the site, proposal, and surrounding network.	No change proposed
20.25D.020.B.2.b	Block Perimeter	Why isn't pedestrian access corridors one of the options available to break down a block?	A new shared use path option, paired with area for landscaping and amenities, can now be used to frame blocks. In addition, can be paired with a plaza amenity.	Complete
20.25D.020.B.2.c	Block Perimeter	What is the rationale behind the maximum block perimeter?	This limit only applies to determine whether block size limits apply. It is intended to provide some additional flexibility to allow sites slightly larger than the 1,200 foot perimeter to develop without triggering block size requirements. It was informed by a parcel analysis.	No change proposed