



Bellevue Planning Commission

April 22, 2026

PLANNING COMMISSION STUDY SESSION ITEM

SUBJECT

Study Session on the BelRed Look Forward Land Use Code Amendment (LUCA)

STAFF CONTACT(S)

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POLICY ISSUES

In 2009, Bellevue adopted the BelRed Subarea Plan to guide BelRed’s transition from an industrial area to walkable, transit-oriented neighborhoods. In 2022, the city launched the BelRed Look Forward to evaluate whether existing policies and Land Use Code (LUC) were achieving the BelRed vision and to reflect new conditions, including increased housing and job targets.

In October 2024, the Council adopted [Ordinance No. 6810](#) and [Ordinance 6811](#) amending the BelRed Subarea Plan and future land use map. These ordinances aim to strengthen implementation, clarify guidance, and increase development capacity through 2044 to 7,900 housing units (23 percent of the City’s target) and 14,200 jobs (20 percent). The BelRed Look Forward LUCA will implement these changes. Tonight, staff will summarize community engagement to date and introduce the first set of proposed LUCA components.

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION

DIRECTION

INFORMATION ONLY

Staff will present the components of the proposed LUCA in two study sessions, and seek Planning Commission feedback at each study session.

	Topic Areas
<input checked="" type="checkbox"/>	Study Session 1 (April 22): Overview, LUCA Review 1 <ul style="list-style-type: none"> • Introduction to LUCA Structure • BelRed Land Use Districts • Standards for Mixed-Use Land Use Districts • BelRed Street Network
<input type="checkbox"/>	Study Session 2 (May 27): LUCA Review 2 <ul style="list-style-type: none"> • Neighborhood Districts and BelRed Arts District Intensive Area • Building Design • Amenity Incentive System
<input type="checkbox"/>	Public Hearing (To Be Scheduled): <ul style="list-style-type: none"> • Required Public Hearing • Planning Commission Recommendation

BACKGROUND/ANALYSIS

On October 22, 2024, the City Council adopted the updated BelRed Subarea Plan and Future Land Use Map. The update reflects changed conditions, strengthens implementation strategies, increases development capacity, and provides clearer guidance for implementation, particularly around local streets. The updated plan increases development capacity by 2044 to:

- 7,900 housing units (23% of the City's housing growth target)
- 14,200 jobs (20% of the City's job growth target)

On February 25, 2025, the City Council initiated the BelRed Look Forward LUCA and emphasized the need to enhance incentives for stream daylighting; explore incentives for affordable commercial space and performance venues; review affordable housing requirements; and strengthen support for a multimodal transportation network.

On May 14, 2025, the Planning Commission reviewed the proposed LUCA scope and received an overview of the two-phased outreach and engagement approach. Phase 1 engagement began after the LUCA was initiated and focused on developing a discussion draft and gathering early input from community members, stakeholders, and city staff to inform the first public LUCA draft and subsequent Planning Commission and community review. Phase 1 engagement has been completed.

On January 14, the Planning Commission received an update on the LUCA, including results from the Phase 1 engagement and information about topics that will be the focus of refinement as the process moves into a more detailed review of the strike draft with the community. During the study session, Commissioners provided high level feedback on several themes, including the proposed street framework, pedestrian and bicycle access, stream corridor integration, arts and cultural development, and ways to spur redevelopment through the LUCA. Commission feedback includes:

- Street framework and walkability: How the proposed framework, including private streets, will ensure pedestrian access and walkability.
- Pedestrian and bicycle network: Need for a robust system, including separated bicycle facilities, to improve access to arts, cultural destinations, and transit.
- Stream corridors: Integration into the public realm as linear parks, consistent with the Comprehensive Plan and BelRed vision.
- Arts and cultural uses: Support for artist housing and live work studios, including targeted incentives to strengthen the district's identity.
- Incentives: Request for additional context on incentives for linear parks and stream related improvements.

Phase 2 Engagement Summary

On December 31, 2025, a [public working draft of the BelRed Look Forward LUCA](#) was published. The draft was shared with Phase 1 outreach participants and distributed more broadly through the LUCA webpage and the Department newsletter. As a working draft, it included placeholders, preliminary policy language, and some incomplete sections. The purpose of publishing an early version of the LUCA was to solicit early community feedback.

The working draft launched Phase 2 of outreach on BelRed, which involved reporting back on Phase 1 engagement and describing how that input informed the draft. Phase 2 also sought feedback on whether the draft was moving in the intended direction and gathered additional input to refine priorities for neighborhood districts and the newly established Arts Intensive Area. Engagement included the broader community, with an open house on February 23 at Highland Community Center. Internal city departments and divisions, nonprofit and community advocacy organizations, and property owners and developers have also engaged through various modes, including email, attendance at the Bellevue Development Committee, and visits to project sites. An engagement summary is provided as **Attachment A**. A comment tracker outlining how specific stakeholder comments have been incorporated in the draft is also provided as **Attachment B**. This comment tracker only reflects responses to comments regarding topics under review for this study session. Comments and responses for topics planned for review at the second study session will be provided with that packet.

Components of the Proposed LUCA

Introduction to LUCA Structure

Bellevue's Comprehensive Plan was updated in October 2024, and applied more generalized future land use designations to Bellevue's growth corridors and neighborhood centers, establishing these areas as mixed use districts with a general level of development intensity. This approach provides the flexibility to develop more generalized LUC standards across mixed use districts. In implementing the new Wilburton Subarea Plan, staff developed a LUC framework for "Mixed Use Land Use Districts" (MULUDs). This framework developed standards for generalized MULUDs which could be applied in different urban circumstances within Bellevue. These district standards can be layered with other, targeted, standards to provide guidance for specific circumstances.

The current LUC part regulating MULUDs includes a mixture of provisions which can apply broadly and which are specific to the Wilburton TOD subarea. The proposed BelRed LUCA (provided as **Attachment C**) will separate MULUD standards which are relevant to both Wilburton and BelRed into one part, and establish separate parts for the smaller set of standards that are genuinely specific to Wilburton or BelRed. While Wilburton-specific standards are changing in terms of location, revising these standards substantively is part of the scope for the BelRed Look Forward.

BelRed Land Use Districts

The proposed LUCA will implement new Land Use Districts and rezone to match 1:1 in name and area with the updated Comprehensive Plan. Some of these Land Use Districts were established with Wilburton, and are proposed to follow the same general standards for maximum building height, FAR, and other development regulations. Several Land Use Districts are new, and the BelRed-General Commercial district has been retained. The proposed BelRed Land Use Districts are summarized in **Figure 1**, and shown on the map provided as **Attachment D**.

Each MULUD is named following a convention that indicates if there is a use emphasis applicable to the district (Residential, Office, or Medical), and the development intensity of the district (Highrise, Midrise, or Lowrise). When a district has a specific use emphasis, that is reflected in the base FAR for the district, the amenity incentive system, and other specific regulations. For example, in a residential-emphasis district, the base FAR for residential projects is typically higher than the base FAR which would apply to a

nonresidential project in that district. A nonresidential project would need to earn additional FAR through the amenity incentive system to build a structure of the same FAR compared to a residential project in that same district. The district’s development intensity label corresponds to consistent maximum building height and FAR limits. FAR above the base and up to the maximum must be earned through the amenity incentive system. The exception is the BelRed General Commercial (BR-GC) district, which is not subject to the amenity incentive system. The updated BelRed amenity incentive system will be reviewed at a future study session. BelRed and Wilburton will retain distinct amenity incentive systems, reflecting different areas of emphasis for these subareas.

Figure 1. Proposed BelRed Land Use Districts

	MU-H	MUR-H	MUO-H	MUM-H	MU-M	MUR-M	MUM-M	MUR-L	BR-GC
	Existing	New	New	New	Existing	Existing	New	New	Existing
Max Height	250'	250'	250'	250'	100'	100'	100'	60'	45'
Max FAR					6.0	6.0	6.0	4.0	
Nonres.	8.0	8.0	8.0	8.0					2.0
Residential	Unlimited	Unlimited	8.0	8.0					1.0

Standards for Mixed-Use Land Use Districts

Mixed-Use Land Use District standards which are proposed to apply to MULUDs in both Wilburton and BelRed are provided in the strike draft (**Attachment C**). These include the following more significant updates, explained in further detail below:

- Nonconforming Uses, Structures and Sites
- Permitted Land Uses

Nonconforming Uses, Structures, and Sites

When the Wilburton LUCA was adopted in 2025, City Council directed staff to standardize Bellevue’s LUC provisions for nonconforming uses, structures, and sites across the city and to better accommodate multi-phased projects. Citywide nonconforming code was established with the Housing Opportunities in Mixed Use Areas (HOMA) LUCA adopted March 17, and the proposed BelRed LUCA will complete additional updates necessary to incorporate BelRed within this new structure. As the HOMA LUCA is adopted but not yet updated on Bellevue’s online code at time of writing, the Citywide nonconforming code sections adopted with HOMA have been provided as **Attachment E** for ease of reference.

Nonconforming uses, structures, and sites are those that were legally conforming at the time they were established, but no longer conform to current standards. The purpose of this code is to allow nonconforming uses, structures and sites to remain in operation, conduct necessary maintenance and repairs, and even allow them to expand in a limited fashion. When substantial improvements are proposed on a nonconforming structure or site, the code also establishes when and how the structure or site may need to also make improvements that move the structure or site toward compliance (known as “proportional compliance”). This is not required for routine maintenance, among other exceptions.

Currently, BelRed’s nonconforming code provisions refer to “existing uses, structures and sites” instead of “nonconforming uses, structures and sites”, but these provisions serve the same function. In fact, the

Citywide nonconforming code framework was developed based on the current BelRed approach, with improvements to better accommodate multi-phased projects and other observed challenges.

Nonconforming codes are critical in supporting districts such as BelRed which have undergone significant change in vision and regulation, but where legacy businesses and industries remain. As proposed to incorporate BelRed, the citywide nonconforming code will continue to provide a framework for legacy business and industries to continue to operate in BelRed, while ultimately providing for a long-term transition. This is consistent with policy **S-BR-10** of the BelRed Subarea Plan:

“Accommodate existing light industrial uses that were legally established as of the date of this plan’s adoption, by allowing for their continued operation, expansion including site expansion outside of nodes and re-building if destroyed. Preclude new light industrial uses from being established, and discontinued light industrial uses from being re-established, with the exception that light industrial uses of limited size are appropriate outside transit nodes and stand-alone residential areas.”

Permitted Land Uses

The proposed LUCA will apply the established approach to permitted land uses in the Mixed-Use Land Use Districts to BelRed. In this approach, all uses are permitted unless specifically listed as prohibited or permitted under certain conditions. The proposed LUCA includes several revisions to better support BelRed’s specific circumstances.

Stakeholders have shared specific concerns regarding car dealerships and warehousing uses. Through the Wilburton process, a neighborhood which also includes existing car dealerships, staff worked closely with stakeholders to develop provisions that allow new car dealerships to be permitted when developed in urban-compatible formats. This includes limiting outdoor storage areas in size and prohibiting storage and display of cars between the building and the street. The established code represents a strong compromise to allow new car dealerships to still locate in Bellevue’s mixed use districts while maintaining priorities for pedestrian-friendly development.

The BelRed Subarea Plan does provide for allowing low-intensity service and retail uses in the BR-GC district, including car dealerships and storage facilities. The proposed LUCA will allow car dealerships, warehouses and storage facilities outright in the BR-GC district. While the proposed LUCA will reduce the total area where these uses are permitted outright within BelRed, urban-format car dealerships will now be permitted throughout the rest of BelRed, expanding where such dealerships may be allowed today.

Other Provisions

Additional code provisions established with the Wilburton LUCA which have been selected to apply to both Wilburton and BelRed include:

- Applying citywide definition of “active use”, instead of BelRed-specific and narrow “required ground floor use”
- Requiring Green and Sustainability Factor and establishing street tree and landscape tree planting requirements
- Public realm standards for weather protection, exterior lighting and blank wall mitigation
- Vehicle and bike parking standards

- Required buffers along freeways, with encouragement to locate sensitive land uses away
- Flexibility in floor plates for medical and life science laboratory uses and mass timber construction, with expanded flexibility for residential mass timber
- Exemption from façade modulation requirements for mass timber, and new exemptions for affordable housing, modular construction, and passive house construction (per state law)
- Standards for parking structures
- Multifamily play areas not required

BelRed Street Network

One of the most significant challenges in facilitating BelRed’s development from a light industrial district to a transit-oriented, walkable community is the size of its blocks and lack of safe, comfortable connections for pedestrians, bicyclists and local traffic. At the same time, while blocks are currently very large, ownership within these blocks is highly fragmented. Without certainty around future street connections, individual developments within larger blocks can create access issues and development barriers for future development on adjacent parcels.

The 2009 BelRed Subarea Plan established a new, required grid of “Local Streets” and “Green Streets” to be dedicated and constructed by future development. This grid was established in the areas surrounding the-now Spring District and BelRed Stations, with even blocks not exceeding 300 feet in length for ideal walkability.

Within this framework, Green Streets play a critical role. They were incorporated within this street network to provide important east-west connections while integrating natural drainage systems and creating a tree-lined environment that prioritizes pedestrians and cyclists.

The Comprehensive Plan and Land Use Code required local streets to be dedicated as public right-of-way as part of redevelopment to ensure permanent public access, connectivity, maintenance, and integration with the broader arterial network in which the city has invested more than \$300 million in recent years. Public dedication is essential to the BelRed vision because it enables walkability; supports multimodal travel; provides for reliable, high-quality maintenance; and ensures that intensification around light rail delivers lasting public benefit.

When first adopted, the city hoped that the new code would encourage site consolidation and master planning to accommodate the local street grid. Instead, other than the Spring District, development to date has proceeded in individual phases. Individual developments have faced challenges implementing the street grid due to site issues including the presence of critical areas, slopes, and more. While the current code provides some flexibility in the alignment of new local streets, and to allow first developments to build interim, “half streets” for street segments on property lines, there is no flexibility on the widths of local streets and green streets or the need to provide local street segments, and minimal flexibility for the ability to offset intersections.

The updated Subarea Plan acknowledges that greater flexibility is needed to implement the street grid, but affirms the need for local streets and green streets through the following policies:

- S-BR-80.** Provide for local streets through development review to establish a new grid system with smaller block sizes, particularly in development nodes emphasizing continuity, connectivity and pedestrian-oriented design. *(Note: “new grid system” is language retained from the original Subarea Plan. This policy does not specifically call for a new grid relative to the grid introduced in 2009.)*
- S-BR-81.** Allow for flexibility to implement the intended alignment and function of local streets where site constraints exist.
- S-BR-85.** Promote the development of “green streets,” with an abundance of street trees and areas of landscaping, to improve the quality and reduce the amount of stormwater runoff, reduce the heat island effect and provide an attractive and comfortable pedestrian experience.

The proposed LUCA offers significant new flexibility to accommodate site challenges without losing essentials of what the street network must provide for BelRed. In addition, the recently updated Critical Areas Ordinance provides increased flexibility for development on sites with critical areas in degraded condition. Much of this flexibility was developed in response to challenges observed in BelRed.

In developing the proposed LUCA, staff reviewed the current street grid, along with past studies of grid implementation issues, and made revisions balancing the following considerations:

- Achieving better alignment with property lines
- Maintaining alternative vehicular and emergency access in areas where the code limits new driveways
- Preserving Green Streets and critical east-west connections
- Increasing the maximum tolerable length between public intersections from 300 to 600 feet
- Avoiding conflicts with known critical areas, including streams and steep slopes

The revised BelRed Street Network, shown on the map provided as **Attachment F**, has removed more than a dozen currently-required local street segments. To balance this loss, the map also defines an area where block size limits apply. Similar to current Wilburton standards, sites larger than 105,000 square feet located in this area will be required to divide into smaller blocks, though they have the flexibility to choose from several private access corridors to provide any connections required in addition to the defined public grid. These private access types are generally narrower than public streets, and can accommodate alternative scenarios such as pedestrian-only streets. Property owners also have more flexibility to define the alignment of these private access corridors.

The code language describing when modifications to the public street grid may be considered has also been expanded to indicate willingness to review alternative proposals for the location of required street alignments and even intersections, provided circulation impacts are analyzed and can be managed.

Even with this increased flexibility, stakeholders have requested the ability to replace defined public street segments with private access corridors, on the condition that access issues to the surrounding area are resolved and the project provides outstanding outcomes for the public realm in exchange. Staff agree that access issues can potentially be resolved using private streets instead of public, though there is a measure of risk of not foreseeing all impacts and of making sacrifices in the public realm. During the study session, staff will lead the Planning Commission in a discussion of the advantages and disadvantages of considering an option that would allow public streets to be replaced with private streets, and suggested criteria for considering these tradeoffs.

Public Engagement

Staff has developed a public engagement plan with six modes of outreach to ensure the public, stakeholders, and interested parties have the opportunity to be informed and to provide comments. These modes will be employed across both phases of work, allowing members of the public to provide comment at key intervals and for staff to respond to feedback in developing recommendations.

- **Process IV Requirements.** Consistent with Chapter 20.35 LUC procedural requirements, public input will be solicited by a notice of application, notice of public hearing and the required public hearing.
- **Public Open House.** One in-person public open house was held on February 23 to provide information on the project and solicit feedback from the general public.
- **Listening Sessions.** Focused listening sessions with representatives from Bellevue departments implementing BelRed code provisions.
- **Online Questionnaire.** Online questionnaire to gather broad perspectives on project priorities, ideas, and concerns. The questionnaire was advertised through a mailer to all BelRed addresses and during in-person engagement and received 161 complete responses.
- **Direct Engagement and Feedback.** Dialogue with developers, residents, employees and other interested parties. Staff presented to and led exercises with the BDC to generate feedback on multiple occasions, including a “Code Lab” focused on key components of the BelRed LUCA on February 25. Staff tabled in person at Meta and at several BelRed events to provide information on the project and answer question.
- **Online Presence.** Engaging Bellevue and City webpages to provide the public information about the project, who to direct questions to, and how to submit comments.

ATTACHMENT(S)

- A. Engagement Report
- B. Comment Tracker
- C. Strike Draft
- D. Proposed BelRed Land Use District Map
- E. Recently Adopted Citywide Nonconforming Code
- F. Proposed BelRed Street Network Map