From: Neal Mulnick
To: PlanningCommission
Cc: Andrew Coates
Subject: Wilburton LUCA - City commissioned CAI economic analysis and rent growth required for development
Date: Friday, December 6, 2024 1:09:01 PM
Attachments: cai.wilburton-pro-forma-model-20240808.xlsx
Updated CAI Study 24.12.06.xlsx

Dear Chair Goeppele and Planning Commissioners:

At the Nov 6th Planning Commission meeting there was great discussion about the draft Wilburton Land Use Code Amendment (LUCA) and specifically about the economic analysis commissioned by the City from CAI. I wanted to make sure you had seen the analysis - I attached a copy and you can also find it here: https://bellevuewa.gov/sites/default/files/media/file/2024/cai.wilburton-pro-forma-model-20240808.xlsx

The City commissioned CAI analysis shows that rents will need to **increase significantly (>50%) before development is possible**. Many of our comments are directed at reducing the regulatory cost of development so that we can see development happen sooner than later without waiting for such large rent increases. The CAI analysis does not factor in many of the LUCA driven cost premiums and **already assumes interest rate cuts and shows an unrealistic - in today's market - +/-4.0% return on cost**. The CAI analysis shows midrise/wood frame construction costs of $600K-$632K per unit. A beautiful, brand new, highly coveted, 300-unit midrise apartment building in downtown Redmond just sold for $410K per unit, another one sold in Overlake for $430K per unit in November, and the Sylvia on Main in downtown Bellevue sold for $405K per unit in September. Furthermore, the CAI $600-$632K per unit cost basis assumes a land cost of $150 per land foot, which in most cases, is below the existing values of income producing property in Wilburton.

The packet for the upcoming meeting references the fact that real estate is cyclical and that we need to take a long term view and not to be overly focused on development metrics like return. While the cyclicality is true, the City's CAI analysis shows that **even at an unrealistic 4.0% return that rents will need to increase by over 50% for the cheapest wood frame construction type** (building up to about ~85'). With a more realistic target of 6.5% yield (probably the lowest cutoff for institutional investors for new construction today) and a requirement of 10% affordable housing at 80% AMI, **rents will**

need to increase 71% for midrise/wood frame construction type for projects to pencil. A high-rise concrete/steel building would be dramatically more expensive and require larger rent increases (>100%). I attached a revised analysis that was put together showing the rent increases required targeting a 6.5% return.

These analyses are why we continue to emphasize the need to do everything we can to reduce cost in the LUCA. While real estate is cyclical, we aren't returning to a zero interest rate environment and even with additional interest rate cuts we will need to see dramatic rent increases under the current LUCA proposal for development to occur. The last thing we want to do is drive additional rent increases based on policy when we so badly need new housing to be built.

Certainly there is a lot of public benefit of seeing redevelopment occur with modern building standards, affordable housing and a walkable transit oriented Wilburton even without layering on more cost in the LUCA. We can help reduce cost by reducing road widths, accommodating reduced open space requirements and many other suggestions that have been submitted. Developers take on an extraordinary amount of risk on these multi hundred million dollar developments and will do everything they can do deliver a project that is successful, pleasant to live in and dramatically improves the neighborhood. By reducing the regulatory cost we can help catalyze development in Wilburton.

There have been Incremental improvements in the draft LUCA, and property owners and developers have dropped our objections to a number of items we find less than ideal in the spirit of compromise and working towards a solution. Major challenges still remain and we're asking the Planning Commission to please step in and help guide revisions to the LUCA.

Thanks,
Neal

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City of Bellevue
Wilburton Land Use Code Amendment (LUCA) Economic Analysis

Pro Forma Model

August 8, 2024

Prepared by:

Prepared for:

Background and Purpose

Economic analysis in support of the Wilburton LUCA is a continuation of a planning effort begun in 2015 with City Council's authorization of a land use code amendment in the Wilburton neighborhood. Pro forma analysis in support of the LUCA examines the relationship between building and land use prototypes, potential public amenities requirements and incentives, and market data regarding real estate development to inform LUCA decision-making.

This pro forma model was developed to serve as an analysis tool for the City of Bellevue. The tool can help evaluate the magnitude and directionality of the impact of a combination of amenity and affordable housing requirements and incentives on potential returns for hypothetical residential and commercial development projects. This model primarily uses Residual Land Value (RLV) as a means to assess financial feasibility. RLV is the remaining money that a developer of a project could use to acquire the land needed for the project (after accounting for all other costs, including construction costs and the developer's return).

This draft is not intended for public use.

Methods

This workbook includes data and assumptions informed by market data analysis as well as outreach to local developers, property owners, and stakeholders. These data and assumptions are informed by a series of working sessions with City of Bellevue staff.

Inputs

The inputs used in this analysis were collected in early 2024 and mostly reflect conditions in the second half of 2023 and the first quarter of 2024. As new data is released and market conditions change, model inputs will need to be updated to accurately reflect the current market.

Table of Contents

This workbook is organized into four categories: outputs, analysis, inputs, and data. Dynamic tabs will require user input; static tabs organize and display assumptions and data that comprise dynamic tabs.

Output tabs	These tabs display **model results**, including results for a set of predefined scenarios.
Control tabs	These tabs allow a user to **update inputs** for scenarios, prototypes, and market factors.
Analysis tabs	These tabs contain the **detailed calculations** used to generate model results.
Inputs tabs	These tabs offer a **detailed summary of inputs and assumptions** for the model.
Data tabs	These tabs contain **raw data from third-party sources** that are used in the model.

Tab Name	Category	Description
Outputs		
Input Exhibit	Static	Summarizes model inputs for each prototype.
Prototype Exhibit	Static	Summarizes all model data for each prototype.
YOC Exhibit	Static	Summarizes the directionality and magnitude of the baseline to scenario yield on cost changes.
Sensitivity Exhibit	Static	Summarizes the sensitivity analysis factoring in rent changes and differing parking requirements for the prototype selected in the model controls tab.
Static Output Exhibit	Static	Summarizes directionality and magnitude of baseline to scenario output changes.
Dynamic Output Exhibit	Static	Summarizes the outputs for the prototype selected in the model controls tab. The tab can be used to copy and paste values to the static output exhibit.
Controls		
Model Controls	Dynamic	Controls which prototype is displayed in the Model Baseline and Scenario tabs. Several components in this tab may be toggled; results will be displayed in the Baseline and Scenario tabs.
Amenity Bonus Controls	Dynamic	Allows users to manipulate the bonuses received for each additional amenity provided.
Prototype Controls	Dynamic	Allows users to manipulate select prototype inputs.
Input Controls	Dynamic	Allows users to manipulate select market inputs.
Analysis		
Model Baseline	Static	Captures pro forma model for baseline analysis.
Model Scenario Base	Static	Captures pro forma model for the base scenario analysis.
Model Scenario Max	Static	Captures pro forma model for the max scenario analysis.
Inputs		
Prototypes Inputs	Dynamic	Allows users to manipulate select prototype inputs.
Model Inputs	Static	Captures market inputs feeding into pro forma models.
Unit Mix	Static	Captures unit mix calculations for affordable and market-rate units.
Financing	Static	Calculates construction loan finance costs.
Data		
ARCH 2023	Static	ARCH income limits and utility allowances.
Lookup Lists	Static	Lists for index functions.
Green Building	Static	Potential green building standard costs.
Site Calcs	Static	Calculates the area and cost associated with required right-of-ways.
IF_MFTE Calculations	Static	Calculates costs associated with Impact Fees and MFTE savings.

How to Use the Model

1 To start, the user should select the prototype they want to model and whether they would like to model a right-of-way requirement in the dynamic **Model Controls** tab.

The model allows the user to test five different prototypes: Urban Core, Mixed-Use Residential Mid-rise, Mixed-use High-rise, Mixed-Use Office Mid-rise, and Medical Office High-rise. Prototypes are predefined using descriptions provided by the City of Bellevue. Users can change the prototype inputs in the **Prototype Controls** tab.

2 The user can then define a scenario to model by changing the highlighted cells in the **Model Controls** tab. Results are displayed in the **Dynamic Output Exhibit** tab.

Highlighted Cells Legend

Manual Entry	Users need to manually enter the value in these cells.
Drop-down	Users need to select an option from a drop-down of options in these cells.

The user can specify the following program requirements for their desired scenario on the **Model Controls** tab:

Baseline, Base Scenario, and Max Scenario:

Right-of-way Requirement	Yes or no toggle. Determines if a right-of-way will be required on the prototype's site. Applies to the baseline, base scenario, and max scenario.
Set Aside Units	Percentage of units to be set aside as affordable.
AMI	Area Median Income (AMI) levels for the affordable units.
In-lieu Fee	An in-lieu fee that can be used as an alternative for providing affordable housing.
Open Space	An option to require open space as part of the site's development.
Green Building	Green building requirements.

Max Scenario:

Set Aside Units	Additional percentage of units to be set aside as affordable.
AMI	Area Median Income (AMI) levels for the additional affordable units.
In-lieu Fee	An additional in-lieu fee can be used as an alternative for providing additional affordable housing.
Unit Mix	Units required to have 3 bedrooms.
Green Building	Additional green building requirements.
Affordable Commercial	Amount of commercial space required to be affordable/subsidized.
Open space	Additional open space required as part of the site's development.
Stream Restoration	Dollars spent towards stream restoration.
Eastrail Improvements	Dollars spent towards Eastrail improvements.
Grand Connection Improvements	Dollars spent towards Grand Connection improvements.

Additionally, the user can specify the bonuses associated with each amenity in the **Amenity Bonus Controls** tab.

The model allows the user to test a scenario where a development has requirements for affordable housing, green building, or open space at a base density (base scenario) and can obtain a large density bonus by providing additional amenities (max scenario). The max scenario assumes the development will take full advantage of the allowed height bonus granted by providing additional amenities. The model compares the base and max scenario to a normal, market-rate development falling within the base density allowance.

The model also allows the user to adjust any model inputs such as market rate rent levels, vacancy rates, and construction inputs in the **Input Controls** tab.

3 Model results are displayed in the **Dynamic Output Exhibit** tab. The model shows results for the baseline, base scenario, and max scenario (defined below) in the **Static Output Exhibits** tab. The Model Baseline, Base Scenario, and Max Scenario tabs capture the calculations that generated the RLV Output. The Model Baseline tab calculates the RLV for a 100% market-rate development, and the outputs from this tab are meant to be used as a baseline with which to compare outputs from the model scenario tabs. The Model Scenario Base tab captures a development that includes the mandatory amenity requirements under the base density for the hypothetical development's site. The outputs from this tab are meant to be compared to the baseline outputs to understand the magnitude and directionality of impacts created by the required amenities under the base density. The Model Scenario Max captures a development that chooses to provide additional amenities in addition to the required amenities to earn the maximum upzone under the max scenario. The outputs for this tab can be compared to the baseline and base scenario outputs to understand the magnitude and directionality of impacts the amenity requirements and upzone

Definitions

Prototypes

Urban Core	Envisioned as a mixed-use tower with 20+ stories and consisting of ground-floor retail.
Mixed-Use Residential Mid-rise	Envisioned as a mid-rise building with 6 stories consisting of residential uses with ground floor active uses, assumed to be retail.
Mixed-use High-rise	Envisioned as a high-rise building consisting of a mix of residential uses with ground floor active uses, assumed to be retail.
Mixed-Use Office Mid-rise	Envisioned as a mid-rise building with 6 stories consisting of office uses with ground floor active uses, assumed to be retail.
Medical Office High-rise	Envisioned as a high-rise building consisting of medical office uses with ground floor active uses, assumed to be retail.

Right-of-way Requirement

Yes	Right-of-way required to be built on the prototype's site.
No	No right-of-way requirement for the prototype's site.

Predefined Scenarios

Baseline	The predefined baseline assumes all units in a development are market rate, and there is no requirement to include affordable units or any other amenities.
Base Scenario	Test mandatory requirements for affordable housing, affordable housing in-lieu fees, open space, and/or green building requirements under a base density.
Max Scenario	Test mandatory requirements for affordable housing, affordable housing in-lieu fees, open space, and/or green building requirements alongside additional voluntary amenities to earn a density bonus represented as a max allowable density increase.

Market Rate Rental Rates

Unit Size	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Notes
Studio	$4.50	$4.20	$4.50	/sf/month
1-Bedroon	$4.20	$3.85	$4.20	/sf/month
2-Bedroon	$3.85	$3.65	$3.85	/sf/month
3-Bedroon	$3.65	$3.45	$3.65	/sf/month

Affordable Rent Limits by Income Level

AMI	Studio	1-Bedroom	2-Bedroom	3-Bedroom
######	$774	$829	$995	$1,150
######	$903	$967	$1,161	$1,341
######	$1,032	$1,106	$1,327	$1,533
######	$1,161	$1,244	$1,492	$1,725
######	$1,290	$1,382	$1,658	$1,916
######	$1,419	$1,520	$1,824	$2,108
######	$1,548	$1,658	$1,990	$2,299
######	$1,677	$1,796	$2,156	$2,491
######	$1,806	$1,935	$2,322	$2,683
######	$1,935	$2,073	$2,487	$2,874
######	$2,064	$2,211	$2,653	$3,066
######	$2,193	$2,349	$2,819	$3,258
######	$2,322	$2,487	$2,985	$3,449
######	$2,451	$2,626	$3,151	$3,641
######	$2,580	$2,764	$3,317	$3,832
######	$2,708	$2,902	$3,482	$4,024
######	$2,837	$3,040	$3,648	$4,216
######	$3,095	$3,317	$3,980	$4,599

Utilitiy Allowances

Allowance	Studio	1-Bedroom	2-Bedroom	3-Bedroom
Utilities	$169	$201	$247	$303
Parking	$99	$99	$99	$99
Total	**$268**	**$300**	**$346**	**$402**

Other Rents

	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes
Market Rate Commercial Rents						
Office	n/a	n/a	n/a	$48	$45	/sf/year (gross)
Retail	$40	$40	$40	$40	$40	/sf/year (NNN)
Subsidized Commercial Rents						
Retail	n/a	n/a	n/a	n/a	n/a	/sf/year (gross)
Office	$20	$20	$20	$20	$20	/sf/year (NNN)
Parking Rents						
Residentia	#########	#########	#########	n/a	n/a	/stall/month
Office	n/a	n/a	n/a	$200	$200	/stall/month
Retail	$0	$0	$0	$0	$0	/stall/month

Vacancy Rates and Operating Expenses

	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes
Credit and Vacancy Loss						
Residentia	5%	5%	5%	n/a	n/a	
Office	n/a	n/a	n/a	#########	10%	
Retail	#########	#########	#########	#########	20%	
Operating Expenses						
Operating	#########	#########	#########	#########	35%	% of EGI

Construction Inputs and Cap Rates

	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes
Financing						
Constructi	30	30	30	30	30	months
Constructi	#########	#########	#########	#########	7.5%	
Loan-to-C	#########	#########	#########	#########	55%	
Construction Costs						
Hard Cost:	#########	#########	#########	#########	$400	per sf
Parking C	#########	#########	#########	#########	##########	per stall
Soft Costs	#########	#########	#########	#########	25%	of hard costs
Continger	#########	#########	#########	5%	5%	of hard costs
Tenant Improvements						
Office	n/a	n/a	n/a	#########	$100	per net sf
Retail	#########	#########	#########	#########	$100	per net sf
Site Prep	$10	$10	$10	$10	$10	per sf
Open Spa	$5	$5	$5	$5	$5	per sf
Capitalization Rates						
Cap Rate	#########	#########	#########	#########	7.00%	

Prototype 1 *Prototype 2* *Prototype 3*

Baseline

Inputs	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Notes
Development Inputs				
Building Footprint	36,750	21,700	50,750	square feet
Site Size	105,000	62,000	145,000	square feet
Gross Building Area (excluding parking)	735,000	130,200	659,750	square feet
Gross Building Area (with parking)	########	174,400	909,025	square feet
Net Floor Area	624,750	110,670	560,788	square feet
Residential	593,513	92,225	517,650	square feet
Commercial	31,238	18,445	43,138	square feet
Floor Area Ratio (FAR)	7.00	2.10	4.55	square feet
Building Height	243	75	159	feet
Above Grade Floor Count	20	6	13	floors
Below Grade Floor Count (parking)	8	3	5	floors
Total Units	879	136	766	units
Unit Mix				
Studio	30%	30%	30%	of total units
1-Bedroom	60%	60%	60%	of total units
2-Bedroom	10%	10%	10%	of total units
3-Bedroom	0%	0%	0%	of total units
Parking Requirements				
Residential	1.0	0.9	0.9	per unit
Retail	1.00	1.00	1.00	units per 1,000 sf
Office	n/a	n/a	n/a	units per 1,000 sf

Scenario

Inputs	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Notes
Development Inputs				
Building Footprint	36,750	34,100	50,750	square feet
Site Size	105,000	62,000	145,000	square feet
Gross Building Area (excluding parking)	########	204,600	########	square feet
Gross Building Area (with parking)	########	274,475	########	square feet
Net Floor Area	########	173,910	862,750	square feet
Residential	########	144,925	819,613	square feet
Commercial	31,238	28,985	43,138	square feet
Floor Area Ratio (FAR)	12.95	3.30	7.00	square feet
Building Height	447	75	243	feet
Above Grade Floor Count	37	6	20	floors
Below Grade Floor Count (parking)	15	3	8	floors
Total Units	1,666	214	1,214	units
Unit Mix				
Studio	30%	30%	30%	of total units
1-Bedroom	60%	60%	60%	of total units
2-Bedroom	10%	10%	10%	of total units
3-Bedroom	0%	0%	0%	of total units
Parking Requirements				
Residential	0.97	0.87	0.95	per unit
Retail	1.00	1.00	1.00	units per 1,000 sf
Office	n/a	n/a	n/a	units per 1,000 sf

Density Limits

Prototype	Height (feet)		FAR	
	Base	Max	Base	Max
Urban Core	250	450	8.0	Unlimited
Mixed-Use Residential	100	100	2.5	4.0
Mixed-use High-rise	160	250	6.0	Unlimited
Mixed-Use Office Mid-	100	100	2.5	4.0
Medical Office High-ri	160	250	6.0	8.0

Prototype 4 *Prototype 5*

Baseline

Inputs	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes
Development Inputs			
Building Footprint	21,700	50,750	square feet
Site Size	62,000	##########	square feet
Gross Building Area (excluding parking)	##########	##########	square feet
Gross Building Area (with parking)	##########	##########	square feet
Net Floor Area	##########	##########	square feet
Residential	0	0	square feet
Commercial	##########	##########	square feet
Floor Area Ratio (FAR)	2.10	4.55	square feet
Building Height	75	159	feet
Above Grade Floor Count	6	13	floors
Below Grade Floor Count (parking)	4	7	floors
Total Units	n/a	n/a	units
Unit Mix			
Studio	n/a	n/a	of total units
1-Bedroom	n/a	n/a	of total units
2-Bedroom	n/a	n/a	of total units
3-Bedroom	n/a	n/a	of total units
Parking			
Residential	n/a	n/a	per unit
Retail	1.00	1.00	units per 1,000 sf
Office	2.00	2.00	units per 1,000 sf

Scenario

Inputs	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes
Development Inputs			
Building Footprint	34,100	50,750	square feet
Site Size	62,000	##########	square feet
Gross Building Area (excluding parking)	##########	##########	square feet
Gross Building Area (with parking)	##########	##########	square feet
Net Floor Area	##########	##########	square feet
Residential	0	0	square feet
Commercial	##########	##########	square feet
Floor Area Ratio (FAR)	3.30	7.00	square feet
Building Height	75	243	feet
Above Grade Floor Count	6	20	floors
Below Grade Floor Count (parking)	4	11	floors
Total Units	n/a	n/a	units
Unit Mix			
Studio	n/a	n/a	of total units
1-Bedroom	n/a	n/a	of total units
2-Bedroom	n/a	n/a	of total units
3-Bedroom	n/a	n/a	of total units
Parking Requirements			
Residential	n/a	n/a	per unit
Retail	1.00	1.00	units per 1,000 sf
Office	2.00	2.00	units per 1,000 sf

	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Land Price Assumption	**$300**	**$150**	**$240**	**$150**	**$240**
Yield on Cost					
Baseline	4.565%	5.005%	4.422%	3.138%	2.815%
Scenario					
Base	4.425%	4.886%	4.287%	3.130%	2.808%
Max	4.346%	4.481%	4.153%	2.683%	2.369%

Rental Sensitivity

	Current Rents			Needed Rents		
	Baseline	Scenario		Baseline	Scenario	
		Base	Max		Base	Max
Urban Core						
Average Rent (mar		$4.26			$6.06	
RLV	$125	($8)	($494)	$1,853	$1,549	$1,943
Yield on Cost	4.626%	4.484%	4.310%	6.392%	6.070%	5.724%
Mixed-Use Residential Mid-rise						
Average Rent (mar		$3.93			$5.06	
RLV	$209	$181	$60	$492	$436	$396
Yield on Cost	5.005%	4.886%	4.481%	6.232%	5.988%	5.487%
Mixed-use High-rise						
Average Rent (mar		$4.25			$6.06	
RLV	$34	($51)	($314)	$1,125	$930	$984
Yield on Cost	4.422%	4.287%	4.153%	6.159%	5.849%	5.553%

Parking Sensitivity

	High			Medium			Low		
	Baseline	Scenario		Baseline	Scenario		Baseline	Scenario	
		Base	Max		Base	Max		Base	Max
Urban Core									
Parking/Unit Ratio	1.54	1.54	1.52	1.04	1.04	1.02	0.54	0.54	0.52
RLV	($404)	($536)	($382)	($140)	($272)	($382)	$125	($7)	($382)
Yield on Cost	4.125%	4.008%	4.346%	4.326%	4.198%	4.346%	4.565%	4.425%	4.346%
Mixed-Use Residential Mid-rise									
Parking/Unit Ratio	1.63	1.63	1.64	1.13	1.13	1.14	0.63	0.63	0.64
RLV	$70	$43	($158)	$140	$112	($49)	$209	$181	$60
Yield on Cost	4.464%	4.365%	3.995%	4.709%	4.601%	4.213%	5.005%	4.886%	4.481%
Mixed-use High-rise									
Parking/Unit Ratio	1.56	1.56	1.54	1.06	1.06	1.04	0.56	0.56	0.54
RLV	($300)	($384)	($843)	($133)	($217)	($578)	$34	($51)	($314)
Yield on Cost	4.022%	3.909%	3.772%	4.206%	4.082%	3.946%	4.422%	4.287%	4.153%

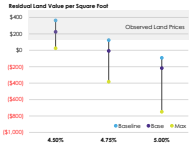
Urban Core

Affordable Housing	Baseline	Scenario	
		Base	Max
	Unit	0%	10%	29%
	AMI	0%	80%	80%
In-lieu Fee	**Baseline**	**Scenario**	
		Base	**Max**
	Per	$28	$28	$28
	Tot\	$0	$0	$0
	% |	10%	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	4.50%	4.75%	5.00%
Baseline Scenario	$365	$125	($91)
Base	$225	($7)	($217)
Max	$25	($360)	($749)
% Change	**(88.7%)**	**(156.9%)**	**(245.7%)**

Yield on Cost			
Hard Cost Assumptio	**$410**	**$385**	**$360**
Total Development Cost Per Unit			
Baseline Scenario	**$563,900**	**$536,700**	**$509,600**
Bas	$563,900	$536,700	$509,600
Ma	$531,600	$505,100	$478,600
Yield on Cost			
Baseline Scenario	4.34%	4.56%	4.81%
Bas	4.21%	4.43%	4.66%
Ma	4.13%	4.32%	4.59%
% Change	**(1.97%)**	**(1.79%)**	**(1.60%)**

	Baseline	Base	Max		Baseli	Base	Max
4.50%	$365	$225	$25	$410	###	###	###
4.75%	$125	($7)	($360)	$385	###	###	###
5.00%	($91)	($217)	($749)	$360	###	###	###
	$139	$339					
	$132	$307					
	$125	$657					



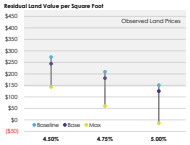
Mixed-Use Residential Mid-rise

Affordable Housing	Baseline	Scenario	
		Base	Max
	Unit	0%	10%	25%
	AMI	0%	80%	80%
In-lieu Fee	**Baseline**	**Scenario**	
		Base	**Max**
	Per	28.07	$28	$28
	Tot\	0	$0	#####
	% |	0.1	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	4.50%	4.75%	5.00%
Baseline Scenario	$273	$209	$151
Base	$244	$181	$125
Max	$143	$60	($15)
% Change	**(41.4%)**	**(66.8%)**	**(111.6%)**

Yield on Cost			
Hard Cost Assumptio	**$290**	**$265**	**$240**
Total Development Cost Per Unit			
Baseline Scenario	**$531,100**	**$500,000**	**$468,900**
Bas	$531,100	$500,000	$468,900
Ma	$489,900	$458,800	$427,800
Yield on Cost			
Baseline Scenario	4.71%	5.01%	5.34%
Bas	4.60%	4.89%	5.21%
Ma	4.32%	4.68%	4.81%
% Change	**(8.77%)**	**(8.30%)**	**(7.76%)**

	Baseline	Base	Max		Baseli	Base	Max
4.50%	$273	$244	$143	$290	###	###	###
4.75%	$209	$181	$60	$265	###	###	###
5.00%	$151	$125	($15)	$240	###	###	###
	$29	$130					
	$27	$149					
	$26	$146					



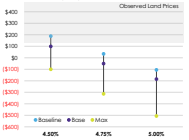
Mixed-Use Residential High-rise

Affordable Housing	Baseline	Scenario	
		Base	Max
	Unit	0%	10%	25%
	AMI	0%	80%	80%
In-lieu Fee	**Baseline**	**Scenario**	
		Base	**Max**
	Per	28.07	$28	$28
	Tot\	0	$0	$0
	% |	0.1	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	4.50%	4.75%	5.00%
Baseline Scenario	$188	$34	($105)
Base	$99	($51)	($185)
Max	($100)	($314)	($506)
% Change	**(200.9%)**	**(320.9%)**	**(173.3%)**

Yield on Cost			
Hard Cost Assumptio	**$410**	**$385**	**$360**
Total Development Cost Per Unit			
Baseline Scenario	**$592,600**	**$564,600**	**$536,600**
Bas	$592,600	$564,600	$536,600
Ma	$552,900	$525,700	$498,600
Yield on Cost			
Baseline Scenario	4.21%	4.42%	4.65%
Bas	4.08%	4.29%	4.51%
Ma	3.93%	4.13%	4.38%
% Change	**(3.34%)**	**(3.14%)**	**(2.93%)**

	Baseline	Base	Max		Baseli	Base	Max
4.50%	$188	$99	($100)	##	###	###	3.93%
4.75%	$34	($51)	($314)	##	###	###	4.13%
5.00%	($105)	($185)	($506)	##	###	###	4.38%
	$89	$288					
	$84	$348					
	$80	$401					



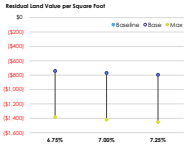
Mixed-Use Office Mid-rise

Affordable Housing	Baseline	Scenario	
		Base	Max
	Unit	0%	0%	0%
	AMI	0%	80%	80%
In-lieu Fee	**Baseline**	**Scenario**	
		Base	**Max**
	Per	###	####	$23	$23
	Tot\	$0		$253,782	$1,534,330
	% |		0.1	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	6.75%	7.00%	7.25%
Baseline Scenario	($739)	($767)	($792)
Base	($743)	($771)	($796)
Max	($1,384)	($1,420)	($1,454)
% Change	**(86.2%)**	**(84.2%)**	**(82.5%)**

Yield on Cost			
Hard Cost Assumptio	**$365**	**$340**	**$315**
Total Development Cost Per Unit			
Baseline Scenario	**#########**	**#########**	**$98,769,900**
Bas	########	########	$99,023,700
Ma	########	########	########
Yield on Cost			
Baseline Scenario	3.01%	3.14%	3.27%
Bas	3.01%	3.13%	3.26%
Ma	2.57%	2.68%	2.80%
% Change	**(14.36%)**	**(14.27%)**	**(14.16%)**

	Baseline	Base	Max		Baseli	Base	Max
6.75%	($739)	($743)	($1,384)	##	###	###	###
7.00%	($767)	($771)	($1,420)	##	###	###	###
7.25%	($792)	($796)	($1,454)	##	###	###	###



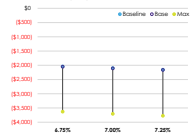
Medical Office High-rise

Affordable Housing	Baseline	Scenario	
		Base	Max
	Units	10%	10%
	AMI	80%	80%
In-lieu Fee	**Base**	**Scenario**	
		Base	**Max**
	Per	$23	$23	$23
	Tot\	$0	$1,424,451	$8,477,271
	% |	0.1	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	6.75%	7.00%	7.25%
Baseline Scenario	($2,042)	($2,100)	($2,154)
Base	($2,051)	($2,110)	($2,164)
Max	($3,630)	($3,700)	($3,774)
% Change	**(77.9%)**	**(75.6%)**	**(74.4%)**

Yield on Cost			
Hard Cost Assumptio	**$425**	**$400**	**$375**
Total Development Cost Per Unit			
Baseline Scenario	**$588,966,600**	**$567,524,700**	**$546,082,800**
Bas	$590,391,000	$568,949,100	$547,507,300
Ma	$897,395,100	$864,607,600	$831,820,100
Yield on Cost			
Baseline Scenario	2.71%	2.82%	2.93%
Bas	2.71%	2.81%	2.92%
Ma	2.28%	2.37%	2.46%
% Change	**(15.67%)**	**(15.63%)**	**(15.59%)**

	Baseline	Base	Max		Baseli	Base	Max
6.75%	($2,042)	($2,051)	($3,630)	##	###	###	2.28%
7.00%	($2,100)	($2,110)	($3,700)	##	###	###	2.37%
7.25%	($2,154)	($2,164)	($3,774)	##	###	###	2.46%



Sample Output Exhibit (for discussion purposes)

Prototype (Model Controls) Mixed-Use Residential Mid-rise

Affordable Housing	Baseline	Scenario	
		Base	Max
Affordable Housing			
Units	0%	10%	25%
AMI	0%	80%	80%
In-lieu Fee	**Baseline**	**Scenario**	
		Base	**Max**
In-lieu Fee			
Per Bonus SF	$28	$28	$28
Total Fee	$0	$0	$0
Open Space			
% Site Area	10%	10%	10%

Residual Land Value per Square Foot			
Capitalization Rate	**4.50%**	**4.75%**	**5.00%**
Baseline	$16	($50)	($110)
Scenario			
Base	($13)	($78)	($136)
Max	($78)	($176)	($265)
% Change	**(490.2%)**	**(126.9%)**	**(94.9%)**

Yield on Cost			
Hard Cost Assumption (/sf)	**$339**	**$314**	**$289**
Total Development Cost Per Unit			
Baseline	$665,100	$632,800	$600,500
Scenario			
Base	$665,100	$632,800	$600,500
Max	$638,200	$606,000	$573,700
Yield on Cost			
Baseline	3.87%	4.06%	4.28%
Scenario			
Base	3.78%	3.97%	4.18%
Max	3.81%	4.01%	4.23%
% Change	**0.75%**	**0.96%**	**1.20%**

Rent Sensitivity (residential)

Affordable Housing	Baseline	Scenario	
		Base	Max
Average Rent		**$3.93**	
RLV	($50)	($78)	($176)
Yield on Cost	4.06%	3.97%	4.01%

Parking Sensitivity

Affordable Housing	Baseline	Scenario	
		Base	Max
Parking/Unit Ratio	**1.00**	**1.00**	**1.00**
RLV	($50)	($78)	($176)
Yield on Cost	4.06%	3.97%	4.01%

Legend

Manual Entry
Drop-down
Calculated (do not change)

Prototype Selection:	Mixed-Use Residential Mid-rise	
Right-of-Way Requirement	No	Applies to Baseline,Base Scenario, and Max Scenario
MFTE/Years:	No 8	Only applies to Base and Max Scenario
Impact Fees Waived:	No	Only applies to Base and Max Scenario

Baseline

Development Inputs

Gross Residential Area	108,500
Gross Office Space	0
Site Size	62,000
Residential FAR	1.8
Office FAR	0
Total Units	136

Baseline

Affordable Housing

Unit Set Aside	0%
AMI	0%
Units	0

Affordable Housing In-lieu Fee

Unit/Office Set Aside Equivalent	0%
Units	0
Replaced SF	0
Per Replaced Affordable SF	$28.07
Total Fee	$0

BelRed Rates

Residential	$28.07
Non-Residential	$23.39

Open Space

% Site Area	10%
Remaining available site area	55%

Green Building

Green Building Standard	None
% of hard costs	0.00%

User Notes: Costs currently informed by 2019 study.

Scenarios

Development Inputs

Gross Residential Area	108,500
Gross Office Space	0
Site Size	62,000
Residential FAR	1.8
Office FAR	0
Total Units	136

Base

Mandatory

Affordable Housing

Unit Set Aside	10%
AMI	80%
Units	14

Affordable Housing In-lieu Fee

Unit/Office Set Aside Equivalent	0%
Units	0
Replaced SF	0
Per Replaced Affordable SF	$28.07
Total Fee	$0

User Notes: Must be set to zero if Affordable (row 26) unit set aside above > 0.

BelRed Rates

Residential	$28.07
Non-Residential	$23.39

Open Space

% Site Area	10%
Remaining available site area	55%

Green Building

Green Building Standard	None
% of hard costs	0.00%

User Notes: Costs currently informed by 2019 study.

Development Inputs

Gross Residential Floor Area	170,500
Gross Office Space	0
Site Size	62,000
Residential FAR	2.8
Office FAR	0.0
Total Units	214
Bonus Area	62,000
Bonus FAR Applied	1.00

Additional Amenities

Need to Reach	62,000 SF
Additional Bonus Area Earned	63,529 SF
Bonus FAR	1.02

Max

Mandatory

Affordable Housing

Unit Set Aside	10%
AMI	80%
Units	21

Affordable Housing In-lieu Fee

Unit/Office Set Aside Equivalent	0%
Unit Equivalent	0
Replaced SF	0
Per Replaced Affordable SF	$28.07
Total Fee	$0

User Notes: Must be set to zero if Affordable (row 26) unit set aside above > 0.

BelRed Rates

Residential	$28.07
Non-Residential	$23.39

Open Space

% Site Area	10%
Remaining available site area	35%

Green Building

Green Building Standard	None
% of hard costs	0.00%

User Notes: Costs currently informed by 2019 study.

Optional:

Affordable Housing

Additional Unit Set Aside	15%
Units	32
Affordable SF	25,412
AMI	80%
Bonus (SF)	63,529

Affordable Housing In-lieu Fee

Unit/Office Set Aside Equivalent	0%
Unit Equivalent	0
Replaced SF	0
Per Replaced Affordable SF	$28
Total Fee	$0
Bonus (SF)	0

Unit Mix

3-bedroom units (additional)	0%
Units	0
Unit SF	0
Bonus (SF)	0
Notes:	

Green Building

Green Building Standard	None
% of hard costs	0.00%
Bonus (SF)	0

User Notes: Costs currently informed by 2019 study. This field should represent a higher cert. than mandatory selection.

Affordable Commercial

% of commercial space	0%
SF of commercial space	0
Bonus (SF)	0

Open space

% Site Area (additional)	0%
SF of Open Space	0
Bonus (SF)	0
Remaining available site area	35%

Stream Restoration

Dollars Spent	$0
Bonus (SF)	0

Eastrail Improvements

Dollars Spent	$0
Bonus (SF)	0

Grand Connection Improvements

Dollars Spent	$0
Bonus (SF)	0

Output

Output Metric	Baseline	Scenario Base	Scenario Max
RLV/sf	($50)	($78)	($176)
Yield on Cost	4.06%	3.97%	4.01%
% Change in YoC			
Baseline to Base		-2.30%	
Base to Max		0.96%	

Values to achieve bonus

Suggested	Actual Input
15%	15%

Values to achieve bonus

Suggested	Actual Input
37%	0%

Notes:
The Baseline analyzes the selected prototype without a density/height bonus, while the Scenario tests the selected prototype, with inputs that reflect the proposed policy.
To analyze individual amenities and the associated impacts on project feasibility, amenity inputs should be updated in tandem to ensure the amenity of interest is the only input changing.

Legend

Manual Entry
Drop-down
Calculated (do not change)

Unit Mix		Max	Notes
3 bedroom units		50	SF per 3 bedroom sf (total)
Affordable Housing			
SF (AMI Limits)			
	80%	2.5	SF per affordable SF
	60%	3.1	SF per affordable SF
	50%	3.8	SF per affordable SF
In-lieu Fee			
Per Replaced Affordable SF		1	SF per $1 of in-lieu fee
Green Building			
LEED v4 Platinum		0.33	FAR
LEED v4 Gold		0.13	FAR
Affordable Commercial			
% of commercial space		13.7	SF per SF affordable commercial space
Open space			
% Site Area (additional)		2.3	SF per SF of open space
Stream Restoration			
Dollars Spent		66.7	SF per $1,000 spent
Eastrail Improvements			
Dollars Spent		66.7	SF per $1,000 spent
Grand Connection Improvements			
Dollars Spent		66.7	SF per $1,000 spent

Legend

Manual Entry
Drop-down
Pulled from model controls
Calculated (do not change)

Baseline

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Development Inputs						
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	prototype name
Total Site Coverage	35%	35%	35%	35%	35%	
Site Size	105,000	62,000	145,000	62,000	145,000	sf
Built Square Feet (excl parking)	735,000	130,200	659,750	130,200	659,750	sf
Building Efficiency	0.85	0.85	0.85	0.85	0.85	
Net Floor Area	624,750	110,670	560,788	110,670	560,788	sf
Residential	593,513	92,225	517,650	0	0	sf
Commercial	31,238	18,445	43,138	110,670	560,788	sf
Office	0	0	0	92,225	517,650	sf
Retail	31,238	18,445	43,138	18,445	43,138	sf
FAR	7.00	2.10	4.55	2.10	4.55	
Target Maximum FAR	8.00	2.50	6.00	2.50	6.00	
Above Grade Floor Count	20	6	13	6	13	floors
Assumed Height	243	75	159	75	159	feet
Maximum Height	250	100	160	100	160	feet
Floor Count						
Residential	19	5	12	0	0	floors
Commercial	1	1	1	6	13	floors
Office	0	0	0	5	12	floors
Retail	1	1	1	1	1	floors
Unit Configuration						
Unit Mix						
Studio	30%	30%	30%	n/a	n/a	
1-Bedroom	60%	60%	60%	n/a	n/a	
2-Bedroom	10%	10%	10%	n/a	n/a	
3-Bedroom	0%	0%	0%	n/a	n/a	
Average Unit Size (net)						
Studio	550	550	550	n/a	n/a	sf
1-Bedroom	700	700	700	n/a	n/a	sf
2-Bedroom	900	900	900	n/a	n/a	sf
3-Bedroom	1,200	1,200	1,200	n/a	n/a	sf
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Parking Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	stalls per unit
Retail	1.0	1.0	1.0	1.0	1.0	stalls per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	stalls per 1,000 sf

Max Scenario

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Development Inputs						
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	prototype name
Total Site Coverage	35%	55%	35%	55%	35%	
Site Size	105,000	62,000	145,000	62,000	145,000	sf
Built Square Feet (excl parking)	1,359,750	204,600	1,015,000	204,600	1,015,000	sf
Building Efficiency	85%	85%	85%	85%	85%	
Net Floor Area	1,155,788	173,910	862,750	173,910	862,750	sf
Residential	1,124,550	144,925	819,613	0	0	sf
Commercial	31,238	18,445	43,138	110,670	560,788	sf
Office	0	0	0	144,925	819,613	sf
Retail	31,238	28,985	43,138	28,985	43,138	sf
FAR	12.95	3.30	7.00	3.30	7.00	
Target Maximum FAR	24.00	4.00	8.00	4.00	8.00	
Above Grade Floor Count	37	6	20	6	20	floors
Assumed Height	447	75	243	75	243	feet
Maximum Height	450	100	250	100	250	feet
Floor Count						
Residential	36	5	19	0	0	floors
Commercial	1	1	1	6	20	floors
Office	0	0	0	5	19	floors
Retail	1	1	1	1	1	floors
Unit Configuration						
Unit Mix						
Studio	30%	30%	30%	n/a	n/a	
1-Bedroom	60%	60%	60%	n/a	n/a	
2-Bedroom	10%	10%	10%	n/a	n/a	
3-Bedroom	0%	0%	0%	n/a	n/a	
Average Unit Size (net)						
Studio	550	550	550	n/a	n/a	sf
1-Bedroom	700	700	700	n/a	n/a	sf
2-Bedroom	900	900	900	n/a	n/a	sf
3-Bedroom	1,200	1,200	1,200	n/a	n/a	sf
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Parking Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	stalls per unit
Retail	1.0	1.0	1.0	1.0	1.0	stalls per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	stalls per 1,000 sf

Base Scenario

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Development Inputs						
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	prototype name
Total Site Coverage	35%	35%	35%	35%	35%	
Site Size	105,000	62,000	145,000	62,000	145,000	sf
Built Square Feet (excl parking)	735,000	130,200	659,750	130,200	659,750	sf
Building Efficiency	0.85	0.85	0.85	0.85	0.85	
Net Floor Area	624,750	110,670	560,788	110,670	560,788	sf
Residential	593,513	92,225	517,650	0	0	sf
Commercial	31,238	18,445	43,138	110,670	560,788	sf
Office	0	0	0	92,225	517,650	sf
Retail	31,238	18,445	43,138	18,445	43,138	sf
FAR	7.00	2.10	4.55	2.10	4.55	
Target Maximum FAR	8.00	2.50	6.00	2.50	6.00	
Above Grade Floor Count	20	6	13	6	13	floors
Assumed Height	243	75	159	75	159	feet
Maximum Height	250	100	160	100	160	feet
Floor Count						
Residential	19	5	12	0	0	floors
Commercial	1	1	1	6	13	floors
Office	0	0	0	5	12	floors
Retail	1	1	1	1	1	floors
Unit Configuration						
Unit Mix						
Studio	30%	30%	30%	n/a	n/a	
1-Bedroom	60%	60%	60%	n/a	n/a	
2-Bedroom	10%	10%	10%	n/a	n/a	
3-Bedroom	0%	0%	0%	n/a	n/a	
Average Unit Size (net)						
Studio	550	550	550	n/a	n/a	sf
1-Bedroom	700	700	700	n/a	n/a	sf
2-Bedroom	900	900	900	n/a	n/a	sf
3-Bedroom	1,200	1,200	1,200	n/a	n/a	sf
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Parking Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	stalls per unit
Retail	1.0	1.0	1.0	1.0	1.0	stalls per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	stalls per 1,000 sf

Legend

Manual Entry
Drop-down
Calculated (do not change)

Model Inputs

Prototype	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes	Sources
Market Rate Rents							
Studio	$4.50	$4.20	$4.50	n/a	n/a	/sf/month	
1-Bedroom	$4.20	$3.85	$4.20	n/a	n/a	/sf/month	Assumption/Stakeholder Feedback/Comps
2-Bedroom	$3.85	$3.65	$3.85	n/a	n/a	/sf/month	
3-Bedroom	$3.65	$3.45	$3.65	n/a	n/a	/sf/month	
Commercial Rents (Market)							
Office	n/a	n/a	n/a	$48.00	$45.00	/sf/year (gross)	Assumption/Stakeholder Feedback/CoStar
Retail	$40.00	$40.00	$40.00	$40.00	$40.00	/sf/year (NNN)	Assumption/Stakeholder Feedback/CoStar
Commercial Rents (Subsidized)							
Office	n/a	n/a	n/a	n/a	n/a		
Retail	$20.00	$20.00	$20.00	$20.00	$20.00		Assumption
Parking Rents							
Residential							
Surface	$50.00	$50.00	$50.00	n/a	n/a	/stall/month	Assumption/Stakeholder Feedback
Structured	$235.00	$235.00	$235.00	n/a	n/a	/stall/month	Assumption/Stakeholder Feedback
Office							
Surface	n/a	n/a	n/a	$50.00	$50.00	/stall/month	Assumption/Stakeholder Feedback
Structured	n/a	n/a	n/a	$200.00	$200.00	/stall/month	Assumption/Stakeholder Feedback
Credit and Vacancy Loss							
Residential	5%	5%	5%	n/a	n/a		Assumption
Office	n/a	n/a	n/a	10%	10%		Assumption
Retail	20%	20%	20%	20%	20%		Assumption
Construction Inputs							
Hard Costs	$468	$314	$468	$340	$400	per sf	Assumption/Stakeholder Feedback/Rider, Levett, & Bucknall
Parking Costs (structured)	$99,180	$82,650	$82,650	$82,650	$99,180	per stall	Assumption/Stakeholder Feedback
Other Inputs							
Cap Rate	4.75%	4.75%	4.75%	7.00%	7.00%		Assumption/CBRE/Stakeholder Feedback
Interest Rate	7.50%	7.50%	7.50%	7.50%	7.50%		Assumption/Stakeholder Feedback

Prototype	Mixed-Use Residential Mid-rise	
Space Inputs		
Site Size	62,000	square feet
Site Size (non-building)	40,300	
Site Prep	100%	of site size
Open Space	10%	of site size
Built Square Feet (excl. parking)	130,200	
Units	136	
Parking Stalls	136	
Surface	0	
Structured	136	

Residential Space	**Units**	**Square Feet (net)**	**Rent /sf/month**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Market Rate						
Studio	40	550	$4.20	$2,310	$92,400	$1,108,800
1-Bedroom	83	700	$3.85	$2,695	$223,685	$2,684,220
2-Bedroom	13	900	$3.65	$3,285	$42,705	$512,460
3-Bedroom	0	1,200	$3.45	$4,140	$0	$0
Total/Average Market Rate	**136**	**675**	**$3.93**	**$2,638**	**$358,790**	**$4,305,480**
Affordable						
Studio	0	550		$1,796	$0	$0
1-Bedroom	0	700		$1,911	$0	$0
2-Bedroom	0	900		$2,307	$0	$0
3-Bedroom	0	1,200		$2,664	$0	$0
Total/Average Affordable	**n/a**	**675**		**n/a**	**n/a**	**n/a**
Total Residential					**$358,790**	**$4,305,480**

Commercial Space	**Units**	**Square Feet (net)**	**Rent /sf/year**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Office		0	n/a		n/a	n/a
Retail		18,445	$40.01		$61,483	$737,800
Subsidized Space			$20.01		$0	$0
Total		**18,445**	**n/a**		**$61,483**	**$737,800**

Parking	**Stalls**	**Square Feet (net)**	**Rent /sf**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Residential	118					
Surface	0			$50	$0	$0
Structured	118			$235	$27,730	$332,760
Commercial	18					
Office	n/a					
Surface	n/a			n/a	n/a	n/a
Structured	n/a			n/a	n/a	n/a
Retail	18					
Surface	0			$0	$0	$0
Structured	18			$0	$0	$0
Total	**136**				**$27,730**	**$332,760**
Gross Annual Revenues	---------->					**$5,376,040**

Revenues		
Annual Revenues	**Input**	**Totals**
Market Rate Residential Rental Revenues		$4,305,480
Affordable Housing Rental Revenues		n/a
Office Revenues		n/a
Retail Revenues		$737,800
Parking Revenues		$332,760
Gross Annual Revenues		$5,376,040
Less Vacancy and Credit Loss		
Residential	5.00%	($215,274)
Office	n/a	n/a
Retail	20.00%	($147,560)
Parking	5.00%	($16,638)
Effective Gross Income		$4,996,568
Less Annual Operating Expenses	30.00%	$1,498,970
NOI		**$3,497,598**

Development costs	**Input**	**Total**	**Per Unit**
Hard Costs	$314	$40,891,914	$300,676
Green Building Cost Increase	0.0%	$0	$0
Parking Costs			
Surface	$5,000	$0	$0
Structured	$82,650	$11,240,400	$82,650
Site Improvement/Prep			
Site Prep	$10	$620,000	$4,559
Open Space	$5	$31,000	$228
Tenant Improvements			
Retail	$100	$1,844,500	$13,563
Office	n/a	$0	$0
Right-of-way/Access Road		$0	$0
Soft Costs	25%	$13,033,079	$95,831
Contingency	10%	$5,213,231	$38,333
Affordable Housing In-lieu Fee		$0	$0
Construction Interest		$3,882,824	$28,550
MFTE Exemption		$0	$0
Impact Fees Waived		$0	$0
Total Development Cost (Excl. Land)		**$76,756,948**	**$564,389**
Land	$150	$9,300,000	$68,382
Total Development Cost		**$86,056,948**	**$632,772**

Sensitivity Analysis

Cap. Rate	**4.50%**	**4.75%**	**5.00%**
Cap. Value	$77,724,391	$73,633,634	$69,951,952
Residual Land Value	$967,443	($3,123,315)	($6,804,996)
RLV/sf	$16	($50)	($110)

Yield on Cost			
Land Prices			
Land/sf	$200	$150	$100
Land	$12,400,000	$9,300,000	$6,200,000
TDC	$89,156,948	$86,056,948	$82,956,948
Yield on Cost	**3.92%**	**4.06%**	**4.22%**
Hard Costs			
Hard Costs	$339	$314	$289
TDC	$90,451,198	$86,056,948	$81,662,698
Yield on Cost	**3.87%**	**4.06%**	**4.28%**

Hard Costs Sensitivity Analysis Calculations

Development costs	**Input**	**Total**	**Input**	**Total**
Hard Costs	$339	$44,146,914	$289	$37,636,914
Green Building Cost Increa	0.0%	$0	0.0%	$0
Parking Costs				
Surface	$5,000	$0	$5,000	$0
Structured	$82,650	$11,240,400	$82,650	$11,240,400
Site Improvement/Prep				
Site Prep	$10	$620,000	$10	$620,000
Open Space	$5	$31,000	$5	$31,000
Tenant Improvements				
Retail	$100	$1,844,500	$100	$1,844,500
Office	n/a	$0	n/a	$0
Soft Costs	25%	$13,846,829	25%	$12,219,329
Contingency	10%	$5,538,731	10%	$4,887,731
Affordable Housing In-lieu Fee		$0		$0
Construction Interest		$3,882,824		$3,882,824
Total Development Cost (Excl. Land)		$81,151,198		$72,362,698
Land		$9,300,000		$9,300,000
Total Development Cost		$90,451,198		$81,662,698

Prototype	Mixed-Use Residential Mid-rise	
Space Inputs		
Site Size	62,000	square feet
Site Size (non-building)	40,300	
Site Prep	100%	of site size
Open Space	10%	of site size
Built Square Feet (excl. parking)	130,200	
Units	136	
Parking Stalls	136	
Surface	0	
Structured	136	

Residential Space	**Units**	**Square Feet (net)**	**Rent /sf/month**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Market Rate						
Studio	36	550	$4.20	$2,310	$83,160	$997,920
1-Bedroom	74	700	$3.85	$2,695	$199,430	$2,393,160
2-Bedroom	12	900	$3.65	$3,285	$39,420	$473,040
3-Bedroom	0	1,200	$3.45	$4,140	$0	$0
Total/Average Market Rate	**122**	**675**	**$3.93**	**$2,639**	**$322,010**	**$3,864,120**
Affordable						
Studio	4	550		$1,796	$7,182	$86,189
1-Bedroom	9	700		$1,911	$17,199	$206,388
2-Bedroom	1	900		$2,307	$2,307	$27,686
3-Bedroom	0	1,200		$2,664	$0	$0
Total/Average Affordable	**14**	**675**		**$1,906**	**$26,689**	**$320,263**
Total Residential					**$348,699**	**$4,184,383**

Commercial Space	**Units**	**Square Feet (net)**	**Rent /sf/year**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Office		0	n/a		n/a	n/a
Retail		18,445	$40.00		$61,483	$737,800
Subsidized Space			$20.00		$0	$0
Total		**18,445**	**n/a**		**$61,483**	**$737,800**

Parking	**Stalls**	**Square Feet (net)**	**Rent /sf**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Residential	118					
Surface	0			$50	$0	$0
Structured	118			$235	$27,730	$332,760
Commercial	18					
Office	n/a					
Surface	n/a			n/a	n/a	n/a
Structured	n/a			n/a	n/a	n/a
Retail	18					
Surface	0			$0	$0	$0
Structured	18			$0	$0	$0
Total	**136**				**$27,730**	**$332,760**

Gross Annual Revenues ----------> **$5,254,943**

Revenues		
Annual Revenues	**Input**	**Totals**
Market Rate Residential Rental Revenues		$3,864,120
Affordable Housing Rental Revenues		$320,263
Office Revenues		n/a
Retail Revenues		$737,800
Parking Revenues		$332,760
Gross Annual Revenues		$5,254,943
Less Vacancy and Credit Loss		
Residential	5.00%	($209,219)
Office	n/a	n/a
Retail	20.00%	($147,560)
Parking	5.00%	($16,638)
Effective Gross Income		$4,881,526
Less Annual Operating Expenses	30.00%	$1,464,458
NOI		**$3,417,068**

Development costs	**Input**	**Total**	**Per Unit**
Hard Costs	$314	$40,891,914	$300,676
Green Building Cost Increase	0.0%	$0	$0
Parking Costs			
Surface	$5,000	$0	$0
Structured	$82,650	$11,240,400	$82,650
Site Improvement/Prep			
Site Prep	$10	$620,000	$4,559
Open Space	$5	$31,000	$228
Tenant Improvements			
Retail	$100	$1,844,500	$13,563
Office	n/a	$0	$0
Right-of-way/Access Road		$0	$0
Soft Costs	25%	$13,033,079	$95,831
Contingency	10%	$5,213,231	$38,333
Affordable Housing In-lieu Fee		$0	$0
Construction Interest		$3,882,824	$28,550
MFTE Exemption		$0	$0
Impact Fees Waived		$0	$0
Total Development Cost (Excl. Land)		**$76,756,948**	**$564,389**
Land	$150	$9,300,000	$68,382
Total Development Cost		**$86,056,948**	**$632,772**

Sensitivity Analysis

Cap. Rate	**4.50%**	**4.75%**	**5.00%**
Cap. Value	$75,934,850	$71,938,278	$68,341,365
Residual Land Value	($822,099)	($4,818,670)	($8,415,584)
RLV/sf	($13)	($78)	($136)

Yield on Cost			
Land Prices			
Land/sf	$200	$150	$100
Land	$12,400,000	$9,300,000	$6,200,000
TDC	$89,156,948	$86,056,948	$82,956,948
Yield on Cost	**3.83%**	**3.97%**	**4.12%**
Hard Costs			
Hard Costs	$339	$314	$289
TDC	$90,451,198	$86,056,948	$81,662,698
Yield on Cost	**3.78%**	**3.97%**	**4.18%**

Hard Costs Sensitivity Analysis Calculations

Development costs	**Input**	**Total**	**Input**	**Total**
Hard Costs	$339	$44,146,914	$289	$37,636,914
Green Building Cost Increase	0.0%	$0	0.0%	$0
Parking Costs				
Surface	$5,000	$0	$5,000	$0
Structured	$82,650	$11,240,400	$82,650	$11,240,400
Site Improvement/Prep				
Site Prep	$10	$620,000	$10	$620,000
Open Space	$5	$31,000	$5	$31,000
Tenant Improvements				
Retail	$100	$1,844,500	$100	$1,844,500
Office	n/a	$0	n/a	$0
Soft Costs	25%	$13,846,829	25%	$12,219,329
Contingency	10%	$5,538,731	10%	$4,887,731
Affordable Housing In-lieu Fee		$0		$0
Construction Interest		$3,882,824		$3,882,824
Total Development Cost (Excl. Land)		$81,151,198		$72,362,698
Land		$9,300,000		$9,300,000
Total Development Cost		$90,451,198		$81,662,698

Prototype	Mixed-Use Residential Mid-rise						
Space Inputs							
Site Size	62.000	square feet					
Site Size (non-building)	27.900						
Site Prep	100%	of site size					
Open Space	10%	of site size					
Built Square Feet (excl. parking)	204,600						
Units	214						
Parking Stalls	215						
Surface	0						
Structured	215						

Residential Space	**Units**	**Square Feet (net)**	**Rent /sf/month**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Market Rate						
Studio	48	550	$4.20	$2,310	$110,880	$1,330,560
1-Bedroom	97	700	$3.85	$2,695	$261,415	$3,136,980
2-Bedroom	16	900	$3.65	$3,285	$52,560	$630,720
3-Bedroom	0	1,200	$3.45	$4,140	$0	$0
Total/Average Market Rate	**161**	**675**	**$3.93**	**$2,639**	**$424,855**	**$5,098,260**
Affordable - Mandatory						
Studio	6	550		$1,796	$10,774	$129,283
1-Bedroom	13	700		$1,911	$24,843	$298,116
2-Bedroom	2	900		$2,307	$4,614	$55,373
3-Bedroom	0	1,200		$2,664	$0	$0
Total/Average Affordable	**21**	**675**		**$1,916**	**$40,231**	**$482,772**
Affordable - Additional						
Studio	9	550		$1,796	$16,160	$193,925
1-Bedroom	20	700		$1,911	$38,220	$458,640
2-Bedroom	3	900		$2,307	$6,922	$83,059
3-Bedroom	0	1,200		$2,664	$0	$0
Total/Average Affordable	**32**	**675**		**$1,916**	**$61,302**	**$735,624**
Total Residential					**$465,086**	**$6,316,656**

Commercial Space	**Units**	**Square Feet (net)**	**Rent /sf/year**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Office		0	n/a		n/a	n/a
Retail		28,985	$40.00		$96,617	$1,159,400
Subsidized Space		0	$20.00		$0	$0
Total		**28,985**	**n/a**		**$96,617**	**$1,159,400**

Parking	**Stalls**	**Square Feet (net)**	**Rent /sf**	**Monthly Rent**	**Total Monthly**	**Total Annual**
Residential	186					
Surface	0			$50	$0	$0
Structured	186			$235	$43,710	$524,520
Commercial	29					
Office	n/a					
Surface	n/a			n/a	n/a	n/a
Structured	n/a			n/a	n/a	n/a
Retail	29					
Surface	0			$0	$0	$0
Structured	29			$0	$0	$0
Total	**215**				**$43,710**	**$524,520**
Gross Annual Revenues	---------->					**$8,000,576**

Revenues		
Annual Revenues	**Input**	**Totals**
Market Rate Residential Rental Revenues		$5,098,260
Affordable Housing Rental Revenues		$1,218,396
Office Revenues		n/a
Retail Revenues		$1,159,400
Parking Revenues		$524,520
Gross Annual Revenues		$8,000,576
Less Vacancy and Credit Loss		
Residential	5.00%	($315,833)
Office	n/a	n/a
Retail	20.00%	($231,880)
Parking	5.00%	($26,226)
Effective Gross Income		$7,426,637
Less Annual Operating Expenses	30.00%	$2,227,991
NOI		**$5,198,646**

Development costs	**Input**	**Total**	**Per Unit**
Hard Costs	$314	$64,258,722	$300,274
Green Building Cost Increase	0.00%	$0	$0
Parking Costs			
Surface	$5,000	$0	$0
Structured	$82,650	$17,769,750	$83,036
Site Improvement/Prep			
Site Prep	$10	$620,000	$2,897
Open Space	$5	$31,000	$145
Tenant Improvements			
Retail	$100	$2,898,500	$13,544
Office	n/a	$0	$0
Right-of-way/Access Road		$0	$0
Soft Costs	25%	$20,507,118	$95,828
Contingency	10%	$8,202,847	$38,331
Affordable Housing In-lieu Fee	$28.07	$0	$0
Stream Restoration		$0	$0
Eastrail Improvements		$0	$0
Grand Connection Improvements		$0	$0
Construction Interest		$6,089,404	$28,455
MFTE Exemption		$0	$0
Impact Fees Waived		$0	$0
Total Development Cost (Excl. Land)		**$120,377,341**	**$562,511**
Land	$150	$9,300,000	$43,458
Total Development Cost		**$129,677,341**	**$605,969**

Sensitivity Analysis

Cap. Rate	**4.50%**	**4.75%**	**5.00%**
Cap. Value	$115,525,468	$109,445,180	$103,972,921
Residual Land Value (RLV)	($4,851,874)	($10,932,162)	($16,404,421)
RLV/sf	($78)	($176)	($265)

Yield on Cost			
Land Prices			
Land/sf	$200	$150	$100
Land	$12,400,000	$9,300,000	$6,200,000
TDC	$132,777,341	$129,677,341	$126,577,341
Yield on Cost	**3.92%**	**4.01%**	**4.11%**
Hard Costs			
Hard Costs	$339	$314	$289
TDC	$136,582,591	$129,677,341	$122,772,091
Yield on Cost	**3.81%**	**4.01%**	**4.23%**

Hard Costs Sensitivity Analysis

Development costs	**Input**	**Total**	**Input**	**Total**
Hard Costs	$339	$69,373,722	$289	$59,143,722
Green Building Cost Increa	0.0%	$0	0.0%	$0
Parking Costs				
Surface	$5,000	$0	$5,000	$0
Structured	#####	$17,769,750	#####	$17,769,750
Site Improvement/Prep				
Site Prep	$10	$620,000	$10	$620,000
Open Space	$5	$31,000	$5	$31,000
Tenant Improvements				
Retail	$100	$2,898,500	$100	$2,898,500
Office	n/a	$0	n/a	$0
Soft Costs	25%	$21,785,868	25%	$19,228,368
Contingency	10%	$8,714,347	10%	$7,691,347
Affordable Housing In-lieu Fee		$0		$0
Construction Interest		$6,089,404		$6,089,404
Total Development Cost (Excl. Land)		$127,282,591		$113,472,091
Land		$9,300,000		$9,300,000
Total Development Cost		$136,582,591		$122,772,091

Legend
Pulled from prototype controls
CAI Assumptions
Pulled from model controls
Calculated (do not change)

Baseline

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	
Building Footprint	36,750	21,700	50,750	21,700	50,750	square feet
Allowance for open space and access	10%	10%	10%	10%	10%	% of site size
Total Site Coverage (podium)	35%	35%	35%	35%	35%	% of site size
Site Size	105,000	62,000	145,000	62,000	145,000	square feet
Built Square Feet (excl parking)	735,000	130,200	659,750	130,200	659,750	square feet
Built Square Feet (w/ parking)	1,020,675	174,400	909,025	195,850	1,010,100	square feet
Building Efficiency	0.85	0.83	0.85	0.85	0.85	net/gross square feet
Net Floor Area	624,750	110,670	560,788	110,670	560,788	square feet
Residential	593,513	92,225	517,650	0	0	square feet
Commercial	31,238	18,445	43,138	110,670	560,788	square feet
Office	0	0	0	92,225	517,650	
Retail	31,238	18,445	43,138	18,445	43,138	
Floor Area Ratio (FAR)	7.00	2.10	4.55	2.10	4.55	square feet
Target Maximum FAR	8.00	2.50	6.00	2.50	6.00	
Ground Floor Height	15	15	15	15	15	feet
Other Floor Height	12	12	12	12	12	feet
Assumed Height	243	75	159	75	159	feet
Maximum Height	250	100	160	100	160	feet
Above Grade Floor Count	20	6	13	6	13	floors
Residential	19	5	12	0	0	floors
Commercial	1	1	1	6	13	floors
Office	0	0	0	5	12	floors
Retail	1	1	1	1	1	floors
Parking (Below Grade)	8	3	5	4	7	floors
Unit Configuration						
Total Units	**879**	**136**	**766**	**n/a**	**n/a**	units
Studio	30%	30%	30%	n/a	n/a	of total units
1-Bedroom	60%	60%	60%	n/a	n/a	of total units
2-Bedroom	10%	10%	10%	n/a	n/a	of total units
3-Bedroom	0%	0%	0%	n/a	n/a	of total units
Average Unit Size (gross)	**794**	**794**	**794**	**n/a**	**n/a**	square feet
Studio	647	647	647	n/a	n/a	square feet
1-Bedroom	824	824	824	n/a	n/a	square feet
2-Bedroom	1,059	1,059	1,059	n/a	n/a	square feet
3-Bedroom	1,412	1,412	1,412	n/a	n/a	square feet
Average Unit Size (net)	**675**	**675**	**675**	**n/a**	**n/a**	square feet
Studio	550	550	550	n/a	n/a	square feet
1-Bedroom	700	700	700	n/a	n/a	square feet
2-Bedroom	900	900	900	n/a	n/a	square feet
3-Bedroom	1,200	1,200	1,200	n/a	n/a	square feet
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	per unit
Retail	1.0	1.0	1.0	1.0	1.0	units per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	units per 1,000 sf
Parking Stalls	**879**	**136**	**767**	**202**	**1,078**	stalls
Residential	848	118	724	n/a	n/a	stalls
Commercial	31	18	43	202	1,078	stalls
Retail	31	18	43	18	43	stalls
Office	n/a	n/a	n/a	184	1,035	stalls
Surface	0	0	0	0	0	
Structured	879	136	767	202	1,078	
Parking Stall Size (gross)						
Surface	300	300	300	300	300	square feet
Structured	325	325	325	325	325	square feet
Parking Square Feet (Gross structured)	285,675	44,200	249,275	65,650	350,350	square feet

Base Scenario

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	
Building Footprint	36,750	21,700	50,750	21,700	50,750	square feet
Allowance for open space and access	10%	10%	10%	10%	10%	% of site size
Total Site Coverage (podium)	35%	35%	35%	35%	35%	% of site size
Site Size	105,000	62,000	145,000	62,000	145,000	square feet
Built Square Feet (excl parking)	735,000	130,200	659,750	130,200	659,750	square feet
Built Square Feet (w/ parking)	1,020,675	174,400	909,025	195,850	1,010,100	square feet
Building Efficiency	0.85	0.85	0.85	0.85	0.85	net/gross square feet
Net Floor Area	624,750	110,670	560,788	110,670	560,788	square feet
Residential	593,513	92,225	517,650	0	0	square feet
Commercial	31,238	18,445	43,138	110,670	560,788	square feet
Office	0	0	0	92,225	517,650	
Retail	31,238	18,445	43,138	18,445	43,138	
Floor Area Ratio (FAR)	7.00	2.10	4.55	2.10	4.55	square feet
Target Maximum FAR	8.00	2.50	6.00	2.50	6.00	
Ground Floor Height	15	15	15	15	15	feet
Other Floor Height	12	12	12	12	12	feet
Assumed Height	243	75	159	75	159	feet
Maximum Height	250	100	160	100	160	feet
Above Grade Floor Count	20	6	13	6	13	floors
Residential	19	5	12	0	0	floors
Commercial	1	1	1	6	13	floors
Office	0	0	0	5	12	floors
Retail	1	1	1	1	1	floors
Parking (Below Grade)	8	3	5	4	7	floors
Unit Configuration						
Total Units	**879**	**136**	**766**	**n/a**	**n/a**	units
Studio	30%	30%	30%	n/a	n/a	of total units
1-Bedroom	60%	60%	60%	n/a	n/a	of total units
2-Bedroom	10%	10%	10%	n/a	n/a	of total units
3-Bedroom	0%	0%	0%	n/a	n/a	of total units
Average Unit Size (gross)	**794**	**794**	**794**	**n/a**	**n/a**	square feet
Studio	647	647	647	n/a	n/a	square feet
1-Bedroom	824	824	824	n/a	n/a	square feet
2-Bedroom	1,059	1,059	1,059	n/a	n/a	square feet
3-Bedroom	1,412	1,412	1,412	n/a	n/a	square feet
Average Unit Size (net)	**675**	**675**	**675**	**n/a**	**n/a**	square feet
Studio	550	550	550	n/a	n/a	square feet
1-Bedroom	700	700	700	n/a	n/a	square feet
2-Bedroom	900	900	900	n/a	n/a	square feet
3-Bedroom	1,200	1,200	1,200	n/a	n/a	square feet
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	per unit
Retail	1.0	1.0	1.0	1.0	1.0	units per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	units per 1,000 sf
Parking Stalls	**879**	**136**	**767**	**202**	**1,078**	stalls
Residential	848	118	724	n/a	n/a	stalls
Commercial	31	18	43	202	1,078	stalls
Retail	31	18	43	18	43	stalls
Office	n/a	n/a	n/a	184	1,035	stalls
Surface	0	0	0	0	0	
Structured	879	136	767	202	1,078	
Parking Stall Size (gross)						
Surface	300	300	300	300	300	square feet
Structured	325	325	325	325	325	square feet
Parking Square Feet (Gross structured)	285,675	44,200	249,275	65,650	350,350	square feet

Max Scenario

Inputs	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5	Notes
Building Type	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	
Building Footprint	36,750	34,100	50,750	34,100	50,750	square feet
Allowance for open space and access	10%	10%	10%	10%	10%	% of site size
Total Site Coverage (podium)	35%	55%	35%	55%	35%	% of site size
Site Size	105,000	62,000	145,000	62,000	145,000	square feet
Built Square Feet (excl parking)	1,359,750	204,600	1,015,000	204,600	1,015,000	square feet
Built Square Feet (w/ parking)	1,892,425	274,475	1,401,750	308,275	1,561,650	square feet
Building Efficiency	0.85	0.80	0.85	0.85	0.85	net/gross square feet
Net Floor Area	1,155,788	173,910	862,750	173,910	862,750	square feet
Residential	1,124,550	144,925	819,613	0	0	square feet
Commercial	31,238	28,985	43,138	173,910	862,751	square feet
Office	0	0	0	144,925	819,613	
Retail	31,238	28,985	43,138	28,985	43,138	
Floor Area Ratio (FAR)	12.35	3.30	7.00	3.30	7.00	square feet
Target Maximum FAR	24.00	4.00	8.00	4.00	8.00	
Ground Floor Height	15	15	15	15	15	feet
Other Floor Height	12	12	12	12	12	feet
Assumed Height	447	75	243	75	243	feet
Maximum Height	450	100	250	100	250	feet
Above Grade Floor Count	37	6	20	6	20	floors
Residential	36	5	19	0	0	floors
Commercial	1	1	1	6	20	floors
Office	0	0	0	5	19	floors
Retail	1	1	1	1	1	floors
Parking (Below Grade)	15	3	8	4	11	floors
Unit Configuration						
Total Units	**1,666**	**214**	**1,214**	**n/a**	**n/a**	units
Studio	30%	30%	30%	n/a	n/a	of total units
1-Bedroom	60%	60%	60%	n/a	n/a	of total units
2-Bedroom	10%	10%	10%	n/a	n/a	of total units
3-Bedroom	0%	0%	0%	n/a	n/a	of total units
Average Unit Size (gross)	**794**	**794**	**794**	**n/a**	**n/a**	square feet
Studio	647	647	647	n/a	n/a	square feet
1-Bedroom	824	824	824	n/a	n/a	square feet
2-Bedroom	1,059	1,059	1,059	n/a	n/a	square feet
3-Bedroom	1,412	1,412	1,412	n/a	n/a	square feet
Average Unit Size (net)	**675**	**675**	**675**	**n/a**	**n/a**	square feet
Studio	550	550	550	n/a	n/a	square feet
1-Bedroom	700	700	700	n/a	n/a	square feet
2-Bedroom	900	900	900	n/a	n/a	square feet
3-Bedroom	1,200	1,200	1,200	n/a	n/a	square feet
Parking						
Parking Type	Structured	Structured	Structured	Structured	Structured	construction type
Requirements						
Residential	1.0	0.9	0.9	n/a	n/a	per unit
Retail	1.0	1.0	1.0	1.0	1.0	stalls per 1,000 sf
Office	n/a	n/a	n/a	2.0	2.0	stalls per 1,000 sf
Parking Stalls	**1,639**	**215**	**1,190**	**319**	**1,682**	stalls
Residential	1,608	186	1,147	n/a	n/a	stalls
Commercial	31	29	43	319	1,682	stalls
Retail	31	29	43	29	43	stalls
Office	n/a	n/a	n/a	290	1,639	stalls
Surface	0	0	0	0	0	stalls
Structured	1,639	215	1,190	319	1,682	stalls
Parking Stall Size (gross)						
Surface	300	300	300	300	300	square feet
Structured	325	325	325	325	325	square feet
Parking Square Feet (Gross structured)	532,675	69,875	386,750	103,675	546,650	square feet

Legend

Pulled from input controls
CAI Assumptions
Calculated (do not change)

Inputs	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise	Notes	Sources
Market Rate Rents							
Studio	$4.50	$4.20	$4.50	n/a	n/a	/sf/month	CoStar/Comps
1-Bedroom	$4.20	$3.85	$4.20	n/a	n/a	/sf/month	CoStar/Comps
2-Bedroom	$3.85	$3.65	$3.85	n/a	n/a	/sf/month	CoStar/Comps
3-Bedroom	$3.65	$3.45	$3.65	n/a	n/a	/sf/month	CoStar/Comps
Affordable Rents - Mandatory	**AMI Level**	**80%**					
Studio	$1,796	$1,796	$1,796	n/a	n/a	/month	ARCH
1-Bedroom	$1,911	$1,911	$1,911	n/a	n/a	/month	ARCH
2-Bedroom	$2,307	$2,307	$2,307	n/a	n/a	/month	ARCH
3-Bedroom	$2,664	$2,664	$2,664	n/a	n/a	/month	ARCH
Affordable Rents - Additional	**AMI Level**	**80%**					
Studio	$1,796	$1,796	$1,796	n/a	n/a	/month	ARCH
1-Bedroom	$1,911	$1,911	$1,911	n/a	n/a	/month	ARCH
2-Bedroom	$2,307	$2,307	$2,307	n/a	n/a	/month	ARCH
3-Bedroom	$2,664	$2,664	$2,664	n/a	n/a	/month	ARCH
Commercial Rents (Market)							
Office	n/a	n/a	n/a	$48.00	$45.00	/sf/year (gross)	CoStar
Retail	$40.00	$40.00	$40.00	$40.00	$40.00	/sf/year (NNN)	CoStar
Commercial Rents (Subsidized)							
Office	n/a	n/a	n/a	n/a	n/a		
Retail	$20.00	$20.00	$20.00	$20.00	$20.00		Placeholder
Parking Rents							
Residential							
Surface	$50.00	$50.00	$50.00	n/a	n/a	/stall/month	Assumption
Structured	$235.00	$235.00	$235.00	n/a	n/a	/stall/month	Assumption
Commercial							
Office							
Surface	n/a	n/a	n/a	$50.00	$50.00	/stall/month	Assumption
Structured	n/a	n/a	n/a	$200.00	$200.00	/stall/month	Assumption
Retail							
Surface	$0	$0	$0	$0	$0	/stall/month	Assumption
Structured	$0	$0	$0	$0	$0	/stall/month	Assumption
Other							
Credit and Vacancy Loss							
Residential	5%	5%	5%	n/a	n/a		CoStar
Office	n/a	n/a	n/a	10%	10%		Assumption
Retail	20%	20%	20%	20%	20%		Assumption
Operating Expenses	30%	30%	30%	35%	35%	of effective gross income	Assumption
Financing							
Construction Timeline	30	30	30	30	30	months	Assumption
Interest Rate	7.50%	7.50%	7.50%	7.50%	7.50%		Assumption
Loan-to-Cost	55%	55%	55%	55%	55%		Assumption
Construction Costs							
Hard Costs	$468	$314	$468	$340	$400	per sf	Rider, Levett, & Bucknall
Parking Costs (surface)	$5,000	$5,000	$5,000	$5,000	$5,000	per stall	Assumption
Parking Costs (structured)	$99,180	$82,650	$82,650	$82,650	$99,180	per stall	Assumption
Soft Costs	25%	25%	25%	25%	25%	of hard costs	Assumption
Contingency	10%	10%	10%	5%	5%	of hard costs	Assumption
Tenant Improvements							
Office	n/a	n/a	n/a	$100	$100	per net sf	Assumption
Retail	$100	$100	$100	$100	$100	per net sf	Assumption
Site Prep Site Coverage	100%	100%	100%	100%	100%	of site size	Assumption
Site Prep	$10	$10	$10	$10	$10	per sf	Assumption
Open Space Development	$5	$5	$5	$5	$5	per sf	Assumption
Land Prices	$300	$150	$240	$150	$240		Assumption
Roadway	$25	$25	$25	$25	$25	per sf	Assumption
Sidewalk	$9	$9	$9	$9	$9	per sf	Forbes
Impact Fees	$1,466	$3,009	$1,466	$9.09	$25.88	Per unit/per GFA	City of Bellevue (https://b
Property Tax Rate	0.710%	0.710%	0.710%	0.710%	0.710%		City of Bellevue (https://b
Annual Property Tax Rate Increase	1.000%	1.000%	1.000%	1.000%	1.000%		Assumption
Capitalization Rates							
Cap Rate	4.75%	4.75%	4.75%	7.00%	7.00%		CBRE

Baseline

Unit Mix (%)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Studio	30%	30%	30%	n/a	n/a
1-Bedroom	60%	60%	60%	n/a	n/a
2-Bedroom	10%	10%	10%	n/a	n/a
3-Bedroom	0%	0%	0%	n/a	n/a

Unit Mix (Count)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Market Rate					
Studio		40			
1-Bedroom		83			
2-Bedroom		13			
3-Bedroom		0			
Total Units		**136**			
Check		*136*			
Affordable					
Studio		0			
1-Bedroom		0			
2-Bedroom		0			
3-Bedroom		0			
Total Units		**0**			
Check		*0*			
Total Units		**136**			
Check		*136*			

Scenario
Base

Unit Mix (%)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Studio	30%	30%	30%	n/a	n/a
1-Bedroom	60%	60%	60%	n/a	n/a
2-Bedroom	10%	10%	10%	n/a	n/a
3-Bedroom	0%	0%	0%	n/a	n/a

Unit Mix (Count)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Market Rate					
Studio		36			
1-Bedroom		74			
2-Bedroom		12			
3-Bedroom		0			
Total Units		**122**			
Check		*122*			
Affordable					
Studio		4			
1-Bedroom		9			
2-Bedroom		1			
3-Bedroom		0			
Total Units		**14**			
Check		*14*			
Total Units		**136**			
Check		*136*			

Max

Unit Mix (%)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Studio	30%	30%	30%	n/a	n/a
1-Bedroom	60%	60%	60%	n/a	n/a
2-Bedroom	10%	10%	10%	n/a	n/a
3-Bedroom	0%	0%	0%	n/a	n/a

Unit Mix (Count)	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Market Rate					
Studio		48			
1-Bedroom		97			
2-Bedroom		16			
3-Bedroom		0			
Total Units		**161**			
Check		*161*			
Affordable					
Studio		6			
1-Bedroom		13			
2-Bedroom		2			
3-Bedroom		0			
Total Units		**21**			
Check		*21*			
Affordable					
Studio		9			
1-Bedroom		20			
2-Bedroom		3			
3-Bedroom		0			
Total Units		**32**			
Check		*32*			
Total Units		**214**			
Check		*214*			

Prototype Mixed Use Residential Mid-rise

Baseline

Costs

Hard Costs	$52,783,314
Soft Costs	$18,246,310
Other Costs	$1,844,500
Total Costs	$72,874,124

Financing Package	**Input**
Debt (Bank Loan)	55%
Equity	45%
Total Financing	100%

Construction Loan	**Input**	
Construction Timeline	30	months
Construction Interest Rate	7.5%	

Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Construction Draw (cumulative)	$1,336,026	$2,672,051	$4,008,077	$5,344,102	$6,680,128	$8,016,154	$9,352,179	$10,688,205	$12,024,230	$13,360,256	$14,696,282	$16,032,307	$17,368,333	$18,704,358	$20,040,384	$21,376,410
Interest	$8,350	$16,700	$25,050	$33,401	$41,751	$50,101	$58,451	$66,801	$75,151	$83,502	$91,852	$100,202	$108,552	$116,902	$125,252	$133,603

Month	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
Construction Draw (cumulative)	$22,712,435	$24,048,461	$25,384,486	$26,720,512	$28,056,538	$29,392,563	$30,728,589	$32,064,615	$33,400,640	$34,736,666	$36,072,691	$37,408,717	$38,744,743	$40,080,768	$0	$0
Interest	$141,953	$150,303	$158,653	$167,003	$175,353	$183,704	$192,054	$200,404	$208,754	$217,104	$225,454	$233,804	$242,155	$250,505	$0	$0

Month	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48
Construction Draw (cumulative)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Interest	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

Base Scenario

Costs

Hard Costs	$52,783,314
Soft Costs	$18,246,310
Other Costs	$1,844,500
Total Costs	$72,874,124

Financing Package	**Input**
Debt (Bank Loan)	55%
Equity	45%
Total Financing	100%

Construction Loan	**Input**	
Construction Timeline	30	months
Construction Interest Rate	7.5%	

Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Construction Draw (cumulative)	$1,336,026	$2,672,051	$4,008,077	$5,344,102	$6,680,128	$8,016,154	$9,352,179	$10,688,205	$12,024,230	$13,360,256	$14,696,282	$16,032,307	$17,368,333	$18,704,358	$20,040,384	$21,376,410
Interest	$8,350	$16,700	$25,050	$33,401	$41,751	$50,101	$58,451	$66,801	$75,151	$83,502	$91,852	$100,202	$108,552	$116,902	$125,252	$133,603

Month	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
Construction Draw (cumulative)	$22,712,435	$24,048,461	$25,384,486	$26,720,512	$28,056,538	$29,392,563	$30,728,589	$32,064,615	$33,400,640	$34,736,666	$36,072,691	$37,408,717	$38,744,743	$40,080,768	$0	$0
Interest	$141,953	$150,303	$158,653	$167,003	$175,353	$183,704	$192,054	$200,404	$208,754	$217,104	$225,454	$233,804	$242,155	$250,505	$0	$0

Month	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48
Construction Draw (cumulative)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Interest	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

Max Scenario

Costs

Hard Costs	$82,679,472
Soft Costs	$28,709,965
Other Costs	$2,898,500
Total Costs	$114,287,937

Financing Package	**Input**
Debt (Bank Loan)	55%
Equity	45%
Total Financing	100%

Construction Loan	**Input**	
Construction Timeline	30	months
Construction Interest Rate	7.5%	

Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Construction Draw	$2,095,279	$4,190,558	$6,285,837	$8,381,115	$10,476,394	$12,571,673	$14,666,952	$16,762,231	$18,857,510	$20,952,789	$23,048,067	$25,143,346	$27,238,625	$29,333,904	$31,429,183	$33,524,462
Interest	$13,095	$26,191	$39,286	$52,382	$65,477	$78,573	$91,668	$104,764	$117,859	$130,955	$144,050	$157,146	$170,241	$183,337	$196,432	$209,528

Month	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
Construction Draw	$35,619,740	$37,715,019	$39,810,298	$41,905,577	$44,000,856	$46,096,135	$48,191,414	$50,286,692	$52,381,971	$54,477,250	$56,572,529	$58,667,808	$60,763,087	$62,858,365	$0	$0
Interest	$222,623	$235,719	$248,814	$261,910	$275,005	$288,101	$301,196	$314,292	$327,387	$340,483	$353,578	$366,674	$379,769	$392,865	$0	$0

Month	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48
Construction Draw	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Interest	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

ARCH 2024 Income and Rent Limits *HUD released AMI* 45383
Median Income: $147,400 *ARCH effective date*
Housing Expense Limit: $0 of Maximum Household Income

HOUSEHOLD INCOME LIMITS--determined by household size
ALL LAND USE & MFTE PROJECTS

Percentage of AMI	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 person
30%	$ 30,954	$ 35,376	$ 39,798	$ 44,220	$ 47,758	$ 51,295	$ 54,833	$ 58,370
35%	$ 36,113	$ 41,272	$ 46,431	$ 51,590	$ 55,717	$ 59,844	$ 63,972	$ 68,099
40%	$ 41,272	$ 47,168	$ 53,064	$ 58,960	$ 63,677	$ 68,394	$ 73,110	$ 77,827
45%	$ 46,431	$ 53,064	$ 59,697	$ 66,330	$ 71,636	$ 76,943	$ 82,249	$ 87,556
50%	$ 51,590	$ 58,960	$ 66,330	$ 73,700	$ 79,596	$ 85,492	$ 91,388	$ 97,284
55%	$ 56,749	$ 64,856	$ 72,963	$ 81,070	$ 87,556	$ 94,041	$ 100,527	$ 107,012
60%	$ 61,908	$ 70,752	$ 79,596	$ 88,440	$ 95,515	$ 102,590	$ 109,666	$ 116,741
65%	$ 67,067	$ 76,648	$ 86,229	$ 95,810	$ 103,475	$ 111,140	$ 118,804	$ 126,469
70%	$ 72,226	$ 82,544	$ 92,862	$ 103,180	$ 111,434	$ 119,689	$ 127,943	$ 136,198
75%	$ 77,385	$ 88,440	$ 99,495	$ 110,550	$ 119,394	$ 128,238	$ 137,082	$ 145,926
80%	$ 82,544	$ 94,336	$ 106,128	$ 117,920	$ 127,354	$ 136,787	$ 146,221	$ 155,654
85%	$ 87,703	$ 100,232	$ 112,761	$ 125,290	$ 135,313	$ 145,336	$ 155,360	$ 165,383
90%	$ 92,862	$ 106,128	$ 119,394	$ 132,660	$ 143,273	$ 153,886	$ 164,498	$ 175,111
95%	$ 98,021	$ 112,024	$ 126,027	$ 140,030	$ 151,232	$ 162,435	$ 173,637	$ 184,840
100%	$ 103,180	$ 117,920	$ 132,660	$ 147,400	$ 159,192	$ 170,984	$ 182,776	$ 194,568
105%	$ 108,339	$ 123,816	$ 139,293	$ 154,770	$ 167,152	$ 179,533	$ 191,915	$ 204,296
110%	$ 113,498	$ 129,712	$ 145,926	$ 162,140	$ 175,111	$ 188,082	$ 201,054	$ 214,025
120%	$ 123,816	$ 141,504	$ 159,192	$ 176,880	$ 191,030	$ 205,181	$ 219,331	$ 233,482

1-person	2-person	3-person	4-person	5-person	6-person	7-person	8-person
0.7	0.8	0.9	1	1.08	1.16	1.24	1.32

	30%
1 person	30954
2 persons	35376
3 persons	39798
4 persons	44220
5 persons	47757.6
6 persons	51295.2
7 persons	54832.8
8 person	58370.4

RENT LIMITS--determined by bedrooms
LAND USE & MFTE PROJECTS EXECUTED BEFORE MAY 1, 2019

Percentage of AMI	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
30%	$ 774	$ 884	$ 995	$ 1,106	$ 1,194
35%	$ 903	$ 1,032	$ 1,161	$ 1,290	$ 1,393
40%	$ 1,032	$ 1,179	$ 1,327	$ 1,474	$ 1,592
45%	$ 1,161	$ 1,327	$ 1,492	$ 1,658	$ 1,791
50%	$ 1,290	$ 1,474	$ 1,658	$ 1,843	$ 1,990
55%	$ 1,419	$ 1,621	$ 1,824	$ 2,027	$ 2,189
60%	$ 1,548	$ 1,769	$ 1,990	$ 2,211	$ 2,388
65%	$ 1,677	$ 1,916	$ 2,156	$ 2,395	$ 2,587
70%	$ 1,806	$ 2,064	$ 2,322	$ 2,580	$ 2,786
75%	$ 1,935	$ 2,211	$ 2,487	$ 2,764	$ 2,985
80%	$ 2,064	$ 2,358	$ 2,653	$ 2,948	$ 3,184
85%	$ 2,193	$ 2,506	$ 2,819	$ 3,132	$ 3,383
90%	$ 2,322	$ 2,653	$ 2,985	$ 3,317	$ 3,582
95%	$ 2,451	$ 2,801	$ 3,151	$ 3,501	$ 3,781
100%	$ 2,580	$ 2,948	$ 3,317	$ 3,685	$ 3,980
105%	$ 2,708	$ 3,095	$ 3,482	$ 3,869	$ 4,179
110%	$ 2,837	$ 3,243	$ 3,648	$ 4,054	$ 4,378
120%	$ 3,095	$ 3,538	$ 3,980	$ 4,422	$ 4,776

RENT LIMITS--determined by bedrooms
LAND USE & MFTE PROJECTS EXECUTED AFTER MAY 1, 2019

Percentage of AMI	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
30%	$ 774	$ 829	$ 995	$ 1,150	$ 1,282
35%	$ 903	$ 967	$ 1,161	$ 1,341	$ 1,496
40%	$ 1,032	$ 1,106	$ 1,327	$ 1,533	$ 1,710
45%	$ 1,161	$ 1,244	$ 1,492	$ 1,725	$ 1,924
50%	$ 1,290	$ 1,382	$ 1,658	$ 1,916	$ 2,137
55%	$ 1,419	$ 1,520	$ 1,824	$ 2,108	$ 2,351
60%	$ 1,548	$ 1,658	$ 1,990	$ 2,299	$ 2,565
65%	$ 1,677	$ 1,796	$ 2,156	$ 2,491	$ 2,778
70%	$ 1,806	$ 1,935	$ 2,322	$ 2,683	$ 2,992
75%	$ 1,935	$ 2,073	$ 2,487	$ 2,874	$ 3,206
80%	$ 2,064	$ 2,211	$ 2,653	$ 3,066	$ 3,420
85%	$ 2,193	$ 2,349	$ 2,819	$ 3,258	$ 3,633
90%	$ 2,322	$ 2,487	$ 2,985	$ 3,449	$ 3,847
95%	$ 2,451	$ 2,626	$ 3,151	$ 3,641	$ 4,061
100%	$ 2,580	$ 2,764	$ 3,317	$ 3,832	$ 4,275
105%	$ 2,708	$ 2,902	$ 3,482	$ 4,024	$ 4,488
110%	$ 2,837	$ 3,040	$ 3,648	$ 4,216	$ 4,702
120%	$ 3,095	$ 3,317	$ 3,980	$ 4,599	$ 5,130
150%	$ 3,869	$ 4,146	$ 4,975	$ 5,749	$ 6,412
200%	$ 5,159	$ 5,528	$ 6,633	$ 7,665	$ 8,549
250%	$ 6,449	$ 6,909	$ 8,291	$ 9,581	$ 10,687

1-person	1.5-person	3-person	4.5-person	6-person
0.7	0.75	0.9	1.04	1.16

Older covenants use the same occupancy multipliers to adjust income and rent limits, shown in gray, above. Covenants executed after 5/1/19 use different multipliers for income and rent limits; new rent limit multipliers (in blue to the right) match those used by other programs, e.g. WSHFC.

ALLOWANCES
ALL LAND USE & MFTE PROJECTS

Column1	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Elect & Gas	$ 64	$ 96	$ 128	$ 160	$ 191
W/S/G	$ 90	$ 90	$ 104	$ 128	$ 151
Renter's insurance	$ 15	$ 15	$ 15	$ 15	$ 15
Sewer capacity	Actual	Actual	Actual	Actual	Actual
Pest control	Actual	Actual	Actual	Actual	Actual
Other*	Actual	Actual	Actual	Actual	Actual
Energy Base Year 1991	$ 20	$ 30	$ 40	$ 50	$ 60
W/S/G Base Year 2019	$ 70	$ 70	$ 81	$ 100	$ 118
Insurance Base Year 2019	$ 12	$ 12	$ 12	$ 12	$ 12
KCHA energy	$ 57	$ 57	$ 73	$ 90	$ 115

If landlord separates garbage from W/S, garbage value is $15.

Base Year		Current		
HALF2, 1990	129.400	Dec-23	412.902	**Elect & Gas CPI (Housi**
Dec-18	321.618	Dec-23	412.902	**W/S/G CPI (Housing, A**
Annual, 2018	271.089	Annual 2023	340.845	**Insurance CPI (All Item**

For comparison:

Column1	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Elect & Gas	$ 53	$ 80	$ 106	$ 133	$ 159
Energy Base Year 1991	$ 20	$ 30	$ 40	$ 50	$ 60

Elect & Gas CPI (Household Energy, Annual, All Urban Consumers, No
Base Year (1990) = 97.6
Current Year (2021) = 258.674

	% of Project Costs New Private Development			
	Office		Multifamily	
	Low	High	Low	High
LEED v4 Certified	-1.00%	0.50%	-0.80%	0.60%
LEED v4 Silver	0.00%	0.50%	0.00%	0.60%
LEED v4 Gold	0.50%	2.00%	0.40%	2.40%
LEED v4 Platinum	1.50%	5.00%	1.20%	6.00%
Net-Zero Energy	-2.00%	8.00%	-1.60%	9.60%

	Urban Core	Mixed-Use Residenti	Mixed-Use Office Mi	Mixed-use High-rise	Medical Office High-rise
None	0.00%	0.00%	0.00%	0.00%	0.00%
LEED v4 Certified	0.60%	0.60%	0.50%	0.60%	0.50%
LEED v4 Silver	0.60%	0.60%	0.50%	0.60%	0.50%
LEED v4 Gold	2.40%	2.40%	2.00%	2.40%	2.00%
LEED v4 Platinum	6.00%	6.00%	5.00%	6.00%	5.00%

Source: https://media.alexandriava.gov/docs-archives/planning/info/gbtfwspprelimanalysisrecommendationsrevised.pdf
Source Date: 2019

	Project Cost Increase			
	Low Range		High Range	
	Low	High	Low	High
General Green Building	0%	5%	10%	12%

Prototype	Mixed-Use Residential Mid-rise	
Right-of-Way Requirement	No	
Site Size	62,000	
Assumption	Square parcel/site	
Length of sides	249	
Righ tof Way Calculations		
Assumption	Full length of the site.	
Road Length	0	
Right-of-way width	34	feet
Road	24	feet
Sidewalk	10	feet
Total right-of-way area	**0**	**square feet**
Road	0	square feet
Sidewalk	0	square feet
Percent of Site	0%	
Total Costs	**$0**	
Road	$0	
Sidewalk	$0	

	Prototype 1	Prototype 2	Prototype 3	Prototype 4	Prototype 5
	Urban Core	Mixed-Use Residential Mid-rise	Mixed-use High-rise	Mixed-Use Office Mid-rise	Medical Office High-rise
Baseline					
GFA	735,000	130,200	659,750	130,200	659,750
Units	879	136	766	n/a	n/a
Impact Fees	$1,288,614	$409,224	$1,122,956	$1,183,518	$17,074,330
Base Scenario					
GFA	735,000	130,200	659,750	130,200	659,750
Units	879	136	766	n/a	n/a
Impact Fees	$1,288,614	$409,224	$1,122,956	$1,183,518	$17,074,330
Max Scenario					
GFA	1,359,750	204,600	1,015,000	204,600	1,015,000
Units	1,666	214	1,214	n/a	n/a
Impact Fees	$2,442,356	$643,926	$1,779,724	$1,859,814	$26,268,200

	Mixed-Use Residential Mid-rise
Baseline	
Residential Revenues	4,305,480
Residential Vacancies	($215,274)
Residential EGI	$4,090,206
Operating Expenses	30%
Residential NOI	$2,863,144
Cap Rate*	5.25%
Residential Improvement Proxy	$54,536,080
Property Tax Rate	0.710%
Annual Property Tax Due	**$387,206**
Base Scenario	
Residential Revenues	4,184,383
Residential Vacancies	($209,219)
Residential EGI	$3,975,164
Operating Expenses	30%
Residential NOI	$2,782,615
Cap Rate*	5.25%
Residential Improvement Proxy	$53,002,187
Property Tax Rate	0.710%
Annual Property Tax Due	**$376,316**
Max Scenario	
Residential Revenues	6,316,656
Residential Vacancies	($315,833)
Residential EGI	$6,000,823
Operating Expenses	30%
Residential NOI	$4,200,576
Cap Rate*	5.25%
Residential Improvement Proxy	$80,010,976
Property Tax Rate	0.710%
Annual Property Tax Due	**$568,078**

*A higher cap rate is used to arrive at the residential improvement proxy in an effort to see improvement values and taxes due more closely aligned with values seen for comparable properties for each prototype analyzed for this analysis. This is necessary, as assessed improvement values often lag market value, current economic conditions notwithstanding.

Year	Base Scenario Tax Amount (Residenti	Max Scenario Tax Amount (Residential Only)
1	$376,316	$568,078
2	$380,079	$573,759
3	$383,879	$579,496
4	$387,718	$585,291
5	$391,595	$591,144
6	$395,511	$597,056
7	$399,467	$603,026
8	$403,461	$609,056
9	$407,496	$615,147
10	$411,571	$621,298
11	$415,686	$627,511
12	$419,843	$633,787
13	$424,042	$640,124
14	$428,282	$646,526
15	$432,565	$652,991
16	$436,891	$659,521
17	$441,260	$666,116
18	$445,672	$672,777
19	$450,129	$679,505
20	$454,630	$686,300

MFTE Years	8	8
Annual Rate Increase	1.0%	1.0%
Discount Rate (Cap Rate + 1.25% spread)	6.00%	6.00%
NPV	$2,412,953	$3,642,542

Prototype Selection	FAR	Units (incentive_1)	Units (incentive_2)	AMI
Urban Core	15%	5%	15%	80%
Mixed-Use Residential Mid-rise	10%	3%	10%	60%
Mixed-use High-rise	7%	2%	7%	50%
Mixed-Use Office Mid-rise	5%	0%	5%	0%
Medical Office High-rise	0%		3%	
			0%	

Green Building	Tier
None	0
LEED v4 Certified	0
LEED v4 Silver	0
LEED v4 Gold	2
LEED v4 Platinum	1

Parking Requirements	BelRed	
Residential	0.75	residential
Medical Office	3.5	medical office
Office	2	professional serv
Mixed-use retail	2	mixed-use retail

https://bellevue.municipal.codes/LUC/20.25D.120

Parking
Surface
Structured
Mixed

Prototype	Suggested Value	Units	Suggested Value	InLieu
Urban Core		19%	48%	
Mixed-Use Resic		15%	37%	
Mixed-use High-		15%	37%	
Mixed-Use Offic		0%	37%	
Medical Office		0%	37%	

Yes	8
No	12
	20

BelRed In-Lieu Fees
https://bellevuewa.gov/sites/default/files/media/pdf_document/permitfees_floor-area-ratio.pdf

	A	B	C	D	E	F	G	H
1								
2		**Mixed-Use Residential Midrise**				$/Unit		
3		**(Wood Frame/Podium <85')**						
4			**Units**	**Parking Stalls**				
5		**CAI Model Scenario Base**	**136**	**136**		$ 632,772		
6		**CAI Model Scenario Max**	**214**	**215**		$ 605,969		
7		**CAI LAND ASSUMED AT $150/LAND SF**						
8								
9		**Costs Excludes**						
10		**Affordable Housing Fees**						
11		**LUCA Cost Premiums**						
12		**LUCA Lost Density/Inefficiency**						
13								
14		**Assumed CAI Model**	**214**	**215**		**$ 605,969**		
15		**Retail Tenant Improvments Removed**				$ -		
16						**$ 605,969**		
17								
18		**Market Yield Required**	**6.50%**			**$ 39,388**		
19		**Market Opex Assumption (30-35%)**	**32.50%**			**$ 18,965**		
20		**Market Total Revenue Required**				**$ 58,353**		
21								
22		**CAI Parking Revenue**	**$ 235.00**			**$ 2,833**		
23		**Market Recoverable Revenue**	**$ 125.00**			**$ 1,500**		
24		**Market Other Income**	**$ 50.00**			**$ 600**		
25		**CAI Retail Rent**	**$ 40.00**	**28,985**		**$ 5,418**		
26		**Market Vacancy**	**5.00%**			**$ (3,435)**		
27								
28		**TARGET ANNUAL RENT REQUIRED**				**$ 51,437**		
29		**TARGET MONTHLY RENT REQUIRED**	**$ 6.35**	**675**	**Average CAI SF**	**$ 4,286**		
30								
31								
32						Monthly Market Rent	Shortfall to Pencil	Growth Required
33		**CURRENT MARKET RENT DT**	**$ 4.25**	**675**	**SF**	**$ 2,869**	**$ 1,418**	**49%**
34		**CAI RENT ASSUMED**	**$ 3.93**	**675**	**SF**	**$ 2,653**	**$ 1,634**	**62%**
35		**CURRENT MARKET RENT BELRED**	**$ 3.75**	**675**	**SF**	**$ 2,531**	**$ 1,755**	**69%**
36								
37		**CAI average SF of 675 is low.**						
38		**CAI retail assumption is not feasible**						
39		**Not sure if CAI include retail leasing commissions**						
40								
41								
42								
43		**Mixed-Use Residential Midrise**				$/Unit		
44		**(Wood Frame/Podium <85')**						
45			**Units**	**Parking Stalls**				
46		**CAI Model Scenario Base**	**136**	**136**		$ 632,772		
47		**CAI Model Scenario Max**	**214**	**215**		$ 605,969		
48								
49		**Costs Excludes**						
50		**Affordable Housing Fees**						
51		**LUCA Cost Premiums**						
52		**LUCA Lost Density/Inefficiency**						
53								
54		**Assumed CAI Model**	**214**	**215**		$ 605,969		
55		**Retail Tenant Improvments Removed**				$ -		
56						**$ 605,969**		
57								
58		**Market Yield Required**	**5.50%**			**$ 33,328**		
59		**Market Opex Assumption (30-35%)**	**32.50%**			**$ 16,047**		
60		**Market Total Revenue Required**				**$ 49,375**		
61								
62		**CAI Parking Revenue**	**$ 235.00**			**$ 2,833**		
63		**Market Recoverable Revenue**	**$ 125.00**			**$ 1,500**		
64		**Market Other Income**	**$ 50.00**			**$ 600**		
65		**CAI Retail Rent**	**$ 40.00**	**28,985**		**$ 5,418**		
66		**Market Vacancy**	**5.00%**			**$ (2,986)**		
67								
68		**TARGET ANNUAL RENT REQUIRED**				**$ 42,011**		
69		**TARGET MONTHLY RENT REQUIRED**	**$ 5.19**	**675**	**Average CAI SF**	**$ 3,501**		
70								
71								
72						Monthly Market Rent	Shortfall to Pencil	Growth Required
73		**CURRENT MARKET RENT DT**	**$ 4.25**	**675**	**SF**	**$ 2,869**	**$ 632**	**22%**
74		**CAI RENT ASSUMED**	**$ 3.93**	**675**	**SF**	**$ 2,653**	**$ 848**	**32%**
75		**CURRENT MARKET RENT BELRED**	**$ 3.75**	**675**	**SF**	**$ 2,531**	**$ 970**	**38%**
76								
77		**CAI average SF of 675 is low.**						
78		**CAI retail assumption is not feasible**						
79		**Not sure if CAI include retail leasing commissions**						

Mixed-Use Residential Midrise (Wood Frame/Podium <85')					$/Unit
	Units	Parking Stalls			
CAI Model Scenario Base	136	136			$ 632,772
CAI Model Scenario Max	214	215			$ 605,969
CAI LAND ASSUMED AT $150/LAND SF					
Costs Excludes					
Affordable Housing Fees					
LUCA Cost Premiums					
LUCA Lost Density/Inefficiency					
Assumed CAI Model	214	215			$ 605,969
Retail Tenant Improvments Removed					$ -
		215	$ 130,283,335		$ 605,969
Market Yield Required	6.50%	215	$ 8,468,417		$ 39,388
Market Opex Assumption (30-35%)	32.50%	215	$ 4,077,386		$ 18,965
Market Total Revenue Required		215	$ 12,545,803		$ 58,353
CAI Parking Revenue	$ 235.00				$ 2,833
Market Recoverable Revenue	$ 125.00				$ 1,500
Market Other Income	$ 50.00				$ 600
CAI Retail Rent	$ 40.00	28,985			$ 5,418
Market Vacancy	5.00%				$ (3,435)
TARGET ANNUAL RENT REQUIRED		214	$ 11,007,478		$ 51,437
CAI - 10% at 80% - Base		21	$ 482,772		$ 22,989
CAI - +15% at 80% - Max		32	$ 735,624		$ 22,988
Market Rent Required		161	$ 9,789,082		$ 60,802
TARGET MONTHLY MARKET RENT REQUIRED	$ 7.51	675	Average CAI SF		$ 5,067

					Monthly Market Rent	Shortfall to Pencil	Growth Required
CURRENT MARKET RENT DT	$ 4.25	675	SF		$ 2,869	$ 2,198	77%
CAI RENT ASSUMED	$ 3.93	675	SF		$ 2,653	$ 2,414	91%
CURRENT MARKET RENT BELRED	$ 3.75	675	SF		$ 2,531	$ 2,536	100%

CAI average SF of 675 is low.
CAI retail assumption is not feasible
Not sure if CAI include retail leasing commissions

Mixed-Use Residential Midrise (Wood Frame/Podium <85')					$/Unit
	Units	Parking Stalls			
CAI Model Scenario Base	136	136			$ 632,772
CAI Model Scenario Max	214	215			$ 605,969
Costs Excludes					
Affordable Housing Fees					
LUCA Cost Premiums					
LUCA Lost Density/Inefficiency					
Assumed CAI Model	214	215			$ 605,969
Retail Tenant Improvments Removed					$ -
					$ 605,969
Market Yield Required	5.50%				$ 33,328
Market Opex Assumption (30-35%)	32.50%				$ 16,047
Market Total Revenue Required					$ 49,375
CAI Parking Revenue	$ 235.00				$ 2,833
Market Recoverable Revenue	$ 125.00				$ 1,500
Market Other Income	$ 50.00				$ 600
CAI Retail Rent	$ 40.00	28,985			$ 5,418
Market Vacancy	5.00%				$ (2,986)
TARGET ANNUAL RENT REQUIRED					$ 42,011
TARGET MONTHLY RENT REQUIRED	$ 5.19	675	Average CAI SF		$ 3,501

					Monthly Market Rent	Shortfall to Pencil	Growth Required
CURRENT MARKET RENT DT	$ 4.25	675	SF		$ 2,869	$ 632	22%
CAI RENT ASSUMED	$ 3.93	675	SF		$ 2,653	$ 848	32%
CURRENT MARKET RENT BELRED	$ 3.75	675	SF		$ 2,531	$ 970	38%

CAI average SF of 675 is low.
CAI retail assumption is not feasible
Not sure if CAI include retail leasing commissions

	Annual $	Units	$/Unit	$/Month	SF	$/SF
CAI - Market	$ 5,098,260	161	$ 31,666	$ 2,639	675	$ 3.91
CAI - 10% at 80% - Base	$ 482,772	21	$ 22,989	$ 1,916	676	$ 2.83
CAI - +15% at 80% - Max	$ 735,624	32	$ 22,988	$ 1,916	677	$ 2.83
	$ 6,316,656	214				

Mixed-Use Residential Midrise (Wood Frame/Podium <85')					$/Unit
	Units	Parking Stalls			
CAI Model Scenario Base	136	136			$ 632,772
CAI Model Scenario Max	214	215			$ 605,969
CAI LAND ASSUMED AT $150/LAND SF					
Costs Excludes					
Affordable Housing Fees					
LUCA Cost Premiums					
LUCA Lost Density/Inefficiency					
Assumed CAI Model	214	215			$ 605,969
Retail Tenant Improvments Removed					$ -
		215	$ 130,283,335		$ 605,969
Market Yield Required	6.50%	215	$ 8,468,417		$ 39,388
Market Opex Assumption (30-35%)	32.50%	215	$ 4,077,386		$ 18,965
Market Total Revenue Required		215	$ 12,545,803		$ 58,353
CAI Parking Revenue	$ 235.00				$ 2,833
Market Recoverable Revenue	$ 125.00				$ 1,500
Market Other Income	$ 50.00				$ 600
CAI Retail Rent	$ 40.00	28,985			$ 5,418
Market Vacancy	5.00%				$ (3,435)
TARGET ANNUAL RENT REQUIRED		214	$ 11,007,478		$ 51,437
CAI - 10% at 80% - Base		21	$ 482,772		$ 22,989
CAI - +15% at 80% - Max		-	$ -		$ -
Market Rent Required		193	$ 10,524,706		$ 54,532
TARGET MONTHLY MARKET RENT REQUIRED	$ 6.73	675	Average CAI SF		$ 4,544

					Monthly Market Rent	Shortfall to Pencil	Growth Required
CURRENT MARKET RENT DT	$ 4.25	675	SF		$ 2,869	$ 1,676	58%
CAI RENT ASSUMED	$ 3.93	675	SF		$ 2,653	$ 1,892	71%
CURRENT MARKET RENT BELRED	$ 3.75	675	SF		$ 2,531	$ 2,013	80%

CAI average SF of 675 is low.
CAI retail assumption is not feasible
Not sure if CAI include retail leasing commissions

	Annual $	Units	$/Unit	$/Month	SF	$/SF
CAI - Market	$ 5,098,260	161	$ 31,666	$ 2,639	675	$ 3.91
CAI - 10% at 80% - Base	$ 482,772	21	$ 22,989	$ 1,916	676	$ 2.83
CAI - +15% at 80% - Max	$ 735,624	32	$ 22,988	$ 1,916	677	$ 2.83
	$ 6,316,656	214				

From: Valentina Vaneeva
To: PlanningCommission
Subject: Wilburton LUCA: parking
Date: Friday, December 6, 2024 7:43:08 PM
Attachments: AHkbwyIg5c1NK3Wv9cLe4sMejGsIFNDY6gIyORvp0lBlNqO_BikZgl2CYI5CKqZQl0O9OvvS7x_ZGNN2S9F1qPnWTDvHxlDLl55NPcGoIdy2H2B66mB1m-xv=w1200-h630-p.png

Hello commissioners,

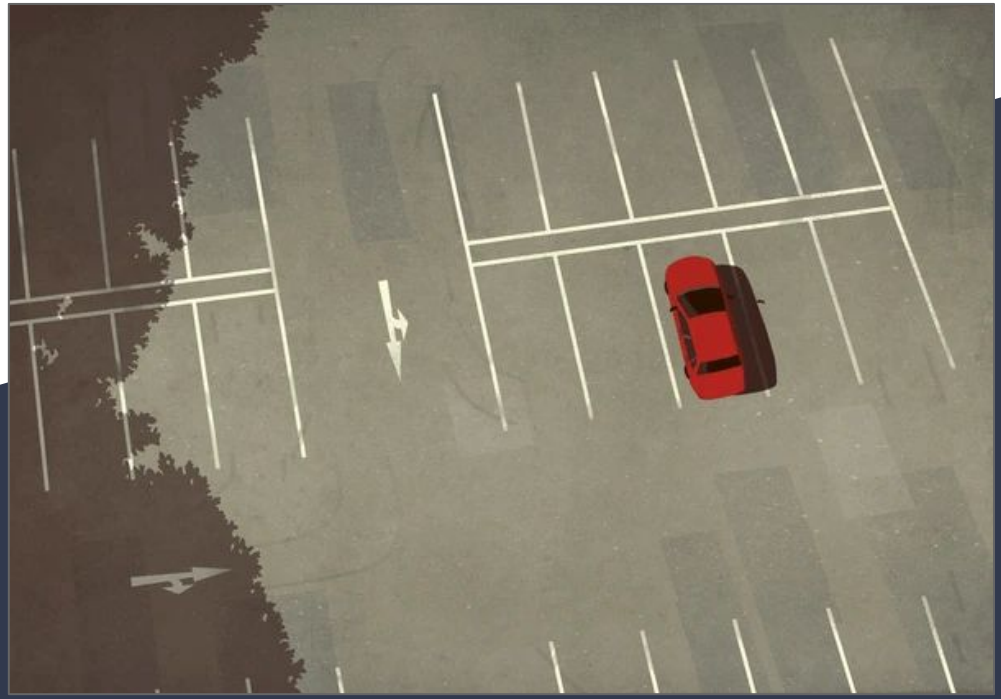
You've heard from me before trying to persuade you to remove minimum parking requirements from Wilburton LUCA completely, and I know that I was not completely successful, but I would like to try again. I am not sure I will be able to attend the meeting on Wednesday, and in case I cannot, here's a presentation I would like you to go through:

Parking mandates presentation
docs.google.com

If you are short on time, please at least take a look at the first six slides. Thank you!

Eliminating Parking Mandates

More housing, more businesses at lower cost, and still, plenty of parking



What are parking mandates?

Today, new developments must include a certain amount of off-street parking.

These mandates in local zoning codes are commonly referred to as **minimum parking requirements** and expressed as a number of parking spaces per home or bedroom, or square foot of office, retail, or commercial space.

Parking minimums are calculated to **exceed demand so there are always empty spaces.**

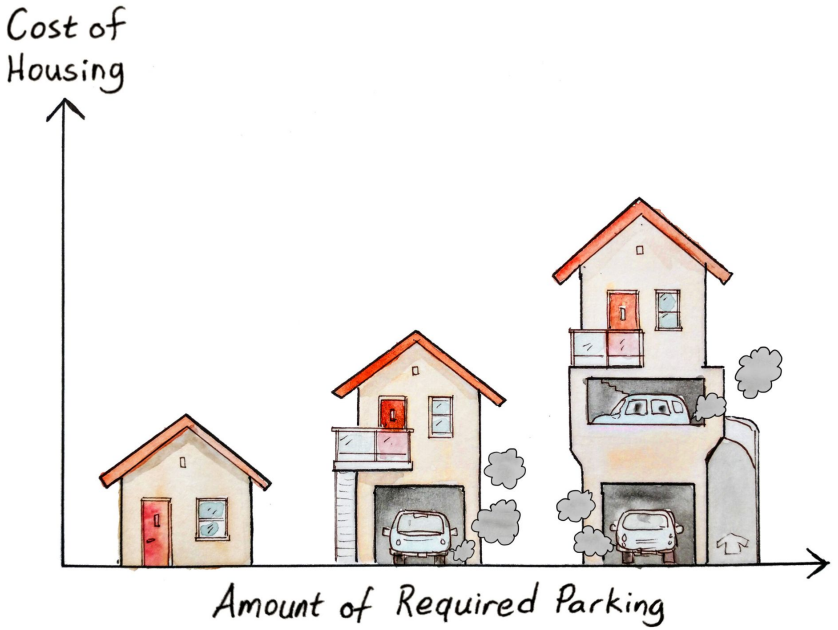
Why are parking mandates a problem?

Parking mandates:

- Increase housing costs
- Limit the supply of new housing
- Generate sprawl and prevent walkability
- Hurt local businesses and hinder economic development
- Penalize those who don’t own a car
- Waste valuable urban space and make our communities more car-dependent, leading to more driving, pollution, and transportation costs

There is no such thing as free parking

- Average stall: ~270 sq ft (design varies; excludes ramps and driveways)
- Average condo bedroom: ~140 sq ft
- $/sq ft in Bellevue: $676
- Average parking stall if it was a home for a human instead of a car: **$182.5k**
- Instead parking is so plentiful in Bellevue that we usually *give it away for free*



Sources: Bellevue Code, Parking Reform Network, Redfin

There is no such thing as free parking

Parking mandates make housing more expensive and limit supply, exacerbating our area's housing crisis

- **One** structured parking stall costs **$35k** (above ground) to **$57k** (below) on average
- The most recent study in the Seattle area shows that all tenants—**even those who don't own cars**—pay **15% higher** rent because of these costs

Source: RLB Construction Cost Calculator, Who Pays for Parking?

32%

Of **all** Bellevue renters are housing cost-burdened, meaning they are already paying more than 30% of their income on rent

The number is much higher for low-to-moderate income groups: **35–80%**

Source: Bellevue Housing Needs Assessment

What about the proposed parking mandates?

They are an improvement since they decrease Bellevue requirements elsewhere by ¾. But we can do better:

- >0 parking spots are still required for studios in an area right next to **light rail, bicycle trail, and RapidRide bus line and plenty of amenities**
- There are still huge discrepancies in requirements depending on business use which prevents cheap conversions (cannot change a small shop into a small cafe)
- On-street parking is still allowed
- All of this in addition to **absolutely free existing park-and-rides on the 2 Line** and cheap underutilized parking garages in Downtown Bellevue and Spring District

Remember: parking minimums are not based on data and getting rid of parking minimums does not mean getting rid of parking. It simply means **more flexible and efficient use of space.**

Source: Parking Laws / Climate Town

"Parking minimums make some broad assumptions, including the idea that all homeowners can afford a car, want to pay for a parking stall, and that the car is their preferred mode of transportation. This works against many other policies a city creates to encourage sustainable development, promote active transportation, and serve low income families."

- Bruce Belmore, president of the Institute of Transportation Engineers, 2019

Source: ITE

Parking is never truly free

- Parking consumes land that could have been something else
  - Public space
  - Housing
  - Outdoor dining
  - A bike lane
  - Retail
  - Landscaping
- A business that builds a parking lot **must cover that cost by passing it on to customers** *(no matter how they arrive)*
- An apartment that builds a parking lot **must cover that cost by passing it on as rent** *(whether or not tenants can drive; even expensive paid parking is still subsidized)*

Mandated parking is overbuilt parking

In 2012 Seattle reduced or eliminated parking minimums in urban centers and near frequent transit

> Over the next 5 years they found that **59%** of newly permitted homes would have been illegal under the old code

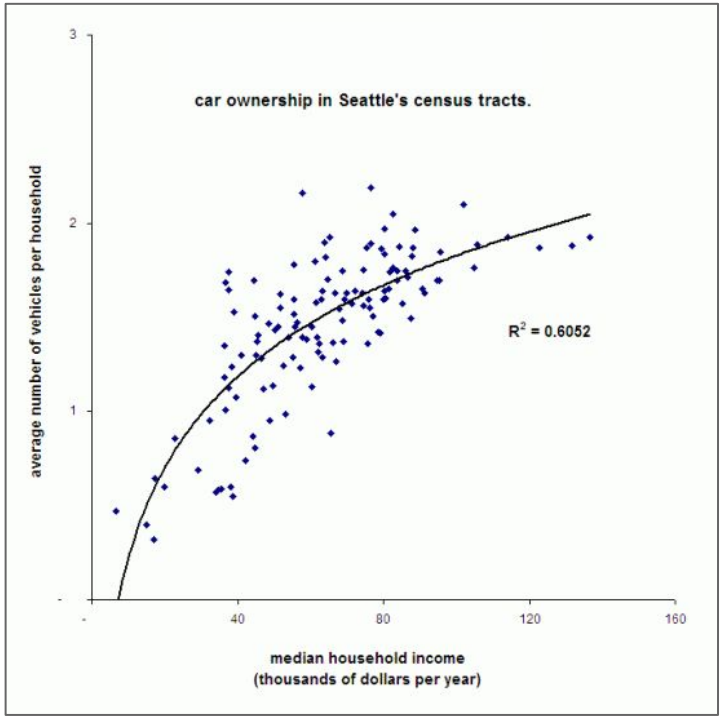
In 2017 Buffalo eliminated parking mandates citywide

> Over the next 2 years they found that **68%** of newly permitted homes would have been illegal under the old code

Source: Sightline Institute

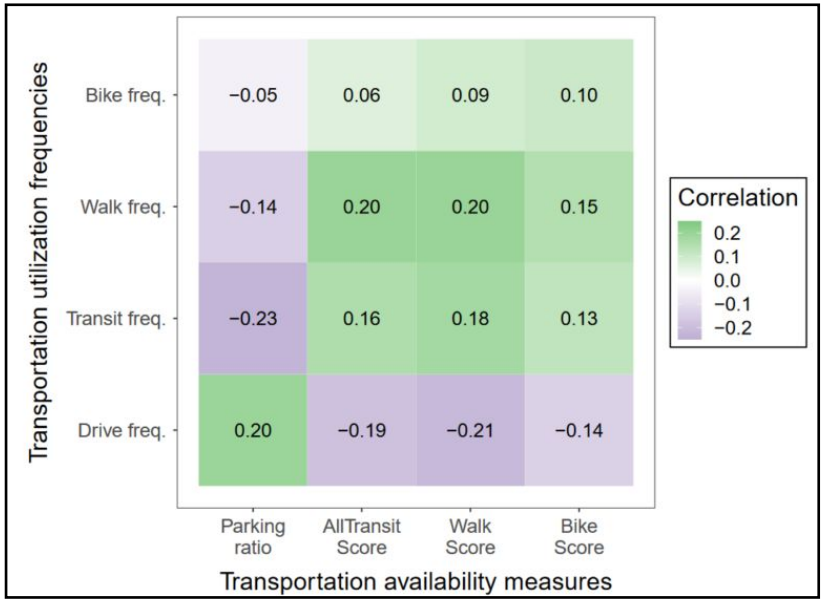
Parking penalizes not driving

- You pay for parking whether you use it or not
- It may not be a line item but you're still paying for it
- Land in Bellevue: **$$$$**
- Parking in Bellevue: **FREE or $**
- **Textbook subsidy to car owners** (who tend to be wealthier)

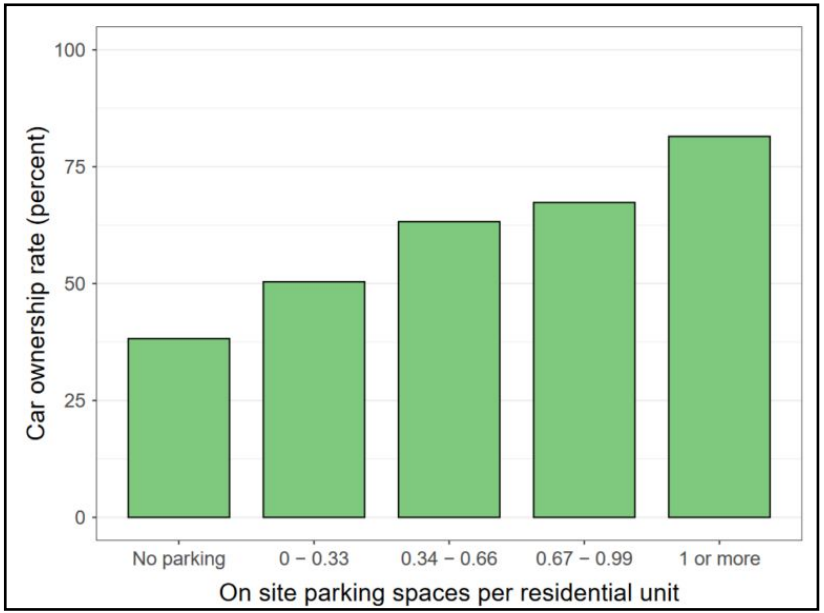


Source: Sightline Institute

Parking promotes driving



San Francisco, CA



San Francisco, CA

Source: University of California

Negative externalities of increased driving

- GHG emissions (both manufacturing a vehicle and driving it)
- Other air pollutants (from engines, tires, and brakes)
- Noise pollution
- Soil and water quality due to runoff
- Road infrastructure and maintenance
- Ownership costs (avg. $1k/month)
- Congestion
- Health costs vs active transportation options
- Safety of others (both drivers and non-drivers)

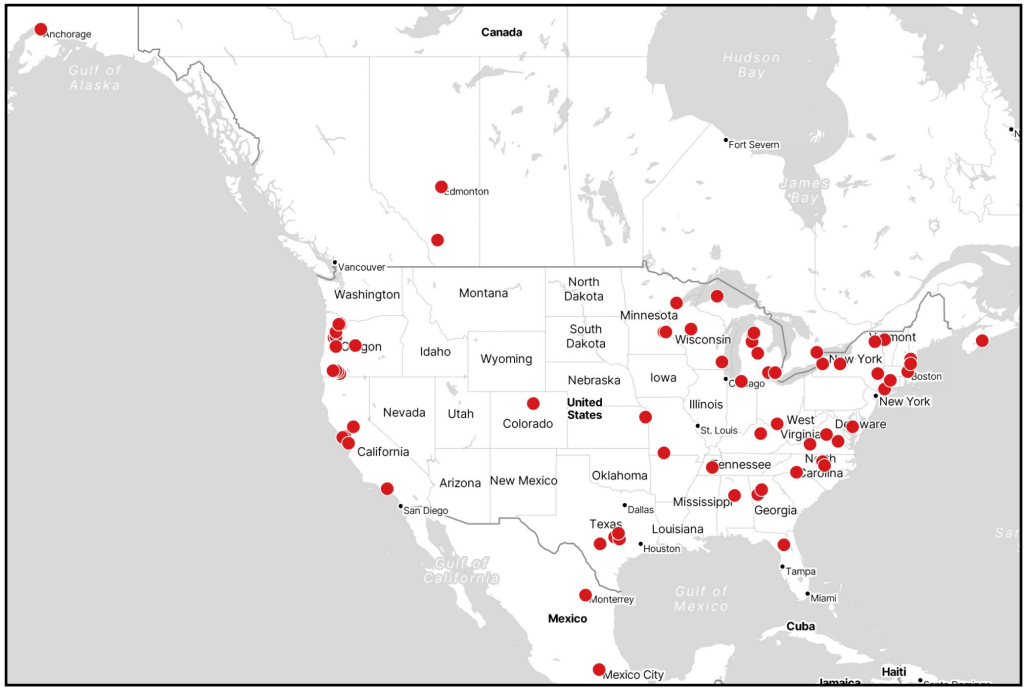
Source: King County

Which other cities are re-examining parking?

85 cities in North America have completely removed their minimum parking mandates.

This includes major cities like Portland, Minneapolis/St Paul, San Francisco, Toronto, Austin, and others.

Spokane, Port Townsend joined them, and Bellingham considers it now.



Source: [Parking Reform Network]

Similar cities to Bellevue

- **Salem and Eugene, OR** (~173k population)
  - Minimums removed in 2023
  - Salem added parking maximums as well

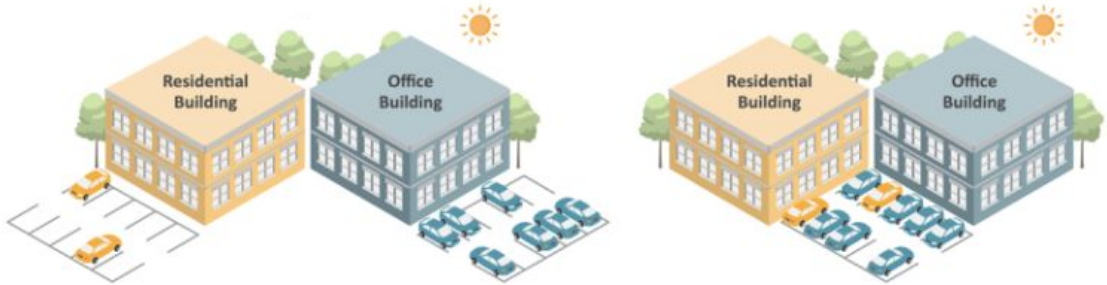
- **Gainesville, FL** (140k population)
  - Minimums removed in 2022

- **Bridgeport, CT** (148k population)
  - Minimums removed in 2021
  - Only accessible parking is required as defined by state law

Source: Parking mandates map

What happens when we eliminate parking mandates?

Eliminating parking mandates would not stop new parking spaces from being built. Rather, it would give each project the flexibility to have the amount of parking it needs.



What happens when we eliminate parking mandates?

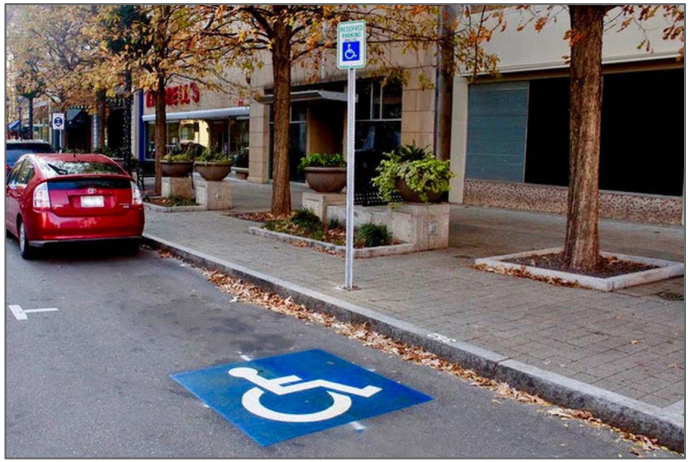
Parking reform should go hand in hand with more active management of on-street parking

This is important in order to

- Efficiently use limited curb space
- Ensure it's always easy to find a parking space when you need one
- Generate revenue that can go towards other public improvements on the street

What about handicap spaces?

- Removing parking mandates doesn't mean parking won't be built, only that it's not built to excess
- Handicap spaces will still be the first to be built
- We will continue to have abundant parking we've already built for decades to come
- An actively managed curbside means more handicap spaces can be created where needed



Hated this presentation?

Watch this video instead: Parking Laws are Strangling America

From: Ben Mickle
To: PlanningCommission
Subject: Wilburton Parking Requirements
Date: Saturday, December 7, 2024 9:30:58 PM

Dear Planning Commissioners,

At your upcoming meeting on the Wilburton LUCA, I want to encourage you to eliminate the off-street parking requirements in the new Land Use Districts.

The parking requirements were created decades ago by people who never intended them to apply in an area with high-frequency light rail, mixed-use zoning, bus rapid transit, and amazing bike trails. Today, they are an unnecessary and large barrier to the housing development that our community urgently needs.

I want to draw your attention to a mixed-use development in Tempe, Arizona called Culdesac. What makes this development unique is that it has no residential parking at all (but it does have commercial parking for the customers who visit its stores and restaurants). You might say it's the "worst case scenario" if you eliminate parking requirements, but if you watch some of the videos about it on YouTube, you'll see that it's not a nightmare at all.

In fact, it's quite lovely. I think many people in our community, including myself, would be not only willing, but eager to live in such a quiet, welcoming place a short walk from our beautiful light rail system. And judging by the rents they're able to charge (compared to prevailing rents in Tempe), I'd say they're having no trouble finding tenants.

If Culdesac succeeds, this development style could become much more common, as it is obviously financially beneficial to the developer if they don't have to build an expensive parking garage. (And if interest rates go back up, this may be the only kind of feasible development in Wilburton for awhile.)

A development like Culdesac in Wilburton would be great for our community. It would provide more housing, of course, but it would also attract more car-free residents, who would contribute to our city's vitality and economic growth without contributing to our traffic congestion (the famous TR-20!), our air pollution, or our road maintenance costs. We shouldn't be *banning* developments like this. We should be incentivizing them! But for now, let's start by just allowing them.

Thanks,

Ben Mickle

From: Evan Lee
To: Council; PlanningCommission
Subject: Comment on 24-716
Date: Monday, December 9, 2024 8:36:44 AM

Minimum parking requirements
I am advocating for **no** minimum parking requirements for Wilburton. Our multi-modal options will continue to improve over the next couple of decades. It will take awhile for Wilburton to be built. We should focus on what will be available in the future. Minimum parking requirements may help in the short term, but they have long term implications that shouldn't be underestimated. Once the buildings are built, they'll be around for a couple decades and will be expensive to change.

Parking is a developer cost which is passed to businesses which is passed to consumers. The consumer will need to pay these costs regardless of their mode of travel. For people who choose modes of travel that don't require parking, they're paying a mandatory premium for no benefit. Leave the amount of parking up to the market.

Multi-modal options to get to and from Wilburton already exist today. They may not be the best of the best but they work. We want drivers to think about whether to drive directly into Wilburton and find parking or drive to parking near light rail and take light rail to Wilburton. Habits are hard to change but we can shape the environment to make it easier to do so.

Activation around a parking garage
I'm assuming this primarily applies to above ground parking garages. Adaptable spaces are essential for activation and I don't think there's a way around it. Whatever attractions that are put in or around the parking garage, people will need to cross the street to interact with them. Making it easier to cross by reducing vehicle speeds to 5mph on adjacent streets to allow pedestrians to cross wherever they want may improve activation. It may be more practical to apply this to north/south or east/west streets than to all adjacent streets.

Block size and building across access corridors
I support the proposed 1200ft block size and the ability to build under and above ground structures that span across access corridors.

From: Dylan Hanson
To: PlanningCommission
Cc: Council
Subject: Wilburton LUCA Public Comment
Date: Sunday, December 8, 2024 9:33:02 AM

Good morning Planning Commissioners,

I am Dylan Hanson, a resident of the Everest Neighborhood of Kirkland and a frequent visitor to the Wilburton Neighborhood of Bellevue for errands, recreation, and work. I'm writing to you all today because I am excited about the coming changes to Wilburton and I'm hopeful that the decisions soon to be made will maximize the Wilburton area for the residents and visitors for the generations to come.

I used to visit Bellevue infrequently because it was stressful to navigate by car, and very uncomfortable to get to by bike (my preferred method of transportation). However, following the opening of the Wilburton light rail station, the secure bike parking within it, the extension of EasTrail to it, and the 8th St overpass adjacent to it, I visit Wilburton multiple times a week. Due to the ease of biking and the secure bike parking at the station, I switched my medical appointments to the area, I now regularly shop at Whole Foods and Uwajimaya, and I use the light rail to get to Mox Boarding House in Bel-Red, the mall downtown, or soon, my real estate office a short walk from Judkins Park Station.

I write this to share how life-changing safe and secure bike access has been for me in visiting Bellevue and I implore the Planning Commission and Council to create the foundation for a Wilburton Neighborhood that is **focused on people** for the future to come and not focused on cars like so much of Bellevue sadly is. Wilburton is now, and will be even more so soon, a multi-modal hub for the city. Wilburton has ample, reliable, car-free access with RapidRide service, the 2-Line, EasTrail, and eventually the Grand Connection Crossing; and I have two recommendations for this continued access in the future:

1. **Eliminate minimum parking requirements –** With ample multimodal access, Wilburton can be focused on people's movement rather than cars' movement. Folks driving in from out of the area can park where there is ample parking at South Bellevue or South Kirkland Park & Ride and take the 2-Line or 250 (or future K-Line) to get to Wilburton.
2. **Maximize housing density** – Working professionally as a real estate agent, I see every day how high housing costs, and lack of access to amenities or work where housing is affordable, are the biggest barriers to folks buying homes or continuing to live in the region. The simple solution to this is building ample housing options near needed amenities in order to slow the rise in housing costs. Wilburton is optimally set up for this being next to multiple grocery stores, medical facilities, and shopping centers. This is true all while having easy access to recreation with Dowtown Park, Marymoor Park, Mercer Slough, the Botanical Gardens, and the Trailhead Direct in the summer season.

I firmly believe that the Wilburton Neighborhood can be a vibrant center of Bellevue for

residents and visitors alike if we plan now for a future that impacts generations to come. I believe that a neighborhood **focused on people**, not cars is the way to do this. I implore the Planning Commission to make this a reality by **eliminating minimum parking requirements** and **maximizing housing density**. Thank you for taking the time to listen to community members and putting in the work to make Bellevue the best it can be.

Best,
Dylan

--

Dylan Hanson, PMP he/him/his
Email: hanson.dylan.c@gmail.com
Cell: 804.380.3826
Connect with me on LinkedIn

From: Dana Wehrman
To: PlanningCommission
Subject: Wilburton LUCA
Date: Sunday, December 8, 2024 10:26:55 AM

Planning Commissioners,

I currently live in Woodinville but I've spent a lot of time in the Wilburton district, as my partner used to live in the Spring District and we would walk to downtown and Wilburton frequently for groceries, the gym, Uwajimaya, and other shopping (this is before the 2 line opened). Due to Wilburton being so close I always felt walking was the best choice, however the layout made it quite unpleasant and it felt like we were doing something "out of the norm" even though the distance was very short. A large part of the unpleasantness was the massive parking lots and car dealerships in the area, and wide roads and car speeds made me feel like I needed to have my head on a swivel, especially since it seemed like drivers wouldn't be expecting many pedestrians in that area.

These days I ride the 545 to Bellevue and take the 2 line every week for a standing meeting, and it's easy to notice how poor the land use is in that area for being so connected to transit. I'm excited for changes that will make it more dense and walkable, and I think a big part of that has to be eliminating parking minimums. The parking in this area is so overbuilt and serves to actively discourage transit use and walking, and it's a simple fact that the more parking you have the more people will choose driving instead of the great alternatives that now exist. Smaller metropolitan areas like Spokane are ahead of Bellevue in eliminating parking minimums, and I encourage you to do the same to make affordable housing easier to build and work towards Bellevue's published climate goals. I can't wait for a walkable Wilburton that I want to visit instead of just pass through.

Thank you,
Dana Wehrman

From: Ariel Davis
To: PlanningCommission
Subject: Wilburton LUCA
Date: Monday, December 9, 2024 8:39:42 AM

Hello,

I'm Ariel, a resident of Bellevue. I understand there are proposed changes the Wilburton area land use code.

Currently that area is mostly wide roads, parking lots, and car-related businesses like dealerships and gas stations. It is not a pleasant place to exist unless one is insulated from the outside by being in their personal car.

Given that not everyone owns a car, and even those who do (like me) may prefer not to always use it to get around the city, I'd like to see the Wilburton area become more friendly for people, not just cars. To that end, I strongly support:

- No parking minimums in this area (or any area)
- No restrictions on building heights in this area
- No zoning restrictions in this area
- Improved infrastructure for non-car transport, like wider sidewalks, dedicated bike lanes, and improved transit access

Thanks for your consideration.

Ariel

From: Ariel Davis
To: PlanningCommission
Subject: Re: Wilburton LUCA
Date: Tuesday, December 10, 2024 7:37:21 PM

I wrote earlier about abolishing parking minimums in Wilburton, or, even better, all of Bellevue. Here is a report from a non-partisan think tank about the numerous detriments of parking minimums in the state of Washington in particular: https://www.sightline.org/the-state-of-parking-mandates-in-washington/

Thank you for your consideration.

Ariel

> On Dec 8, 2024, at 21:41, Ariel Davis <ariel.z.davis@icloud.com> wrote:
>
> Hello,
>
> I'm Ariel, a resident of Bellevue. I understand there are proposed changes the Wilburton area land use code.
>
> Currently that area is mostly wide roads, parking lots, and car-related businesses like dealerships and gas stations. It is not a pleasant place to exist unless one is insulated from the outside by being in their personal car.
>
> Given that not everyone owns a car, and even those who do (like me) may prefer not to always use it to get around the city, I'd like to see the Wilburton area become more friendly for people, not just cars. To that end, I strongly support:
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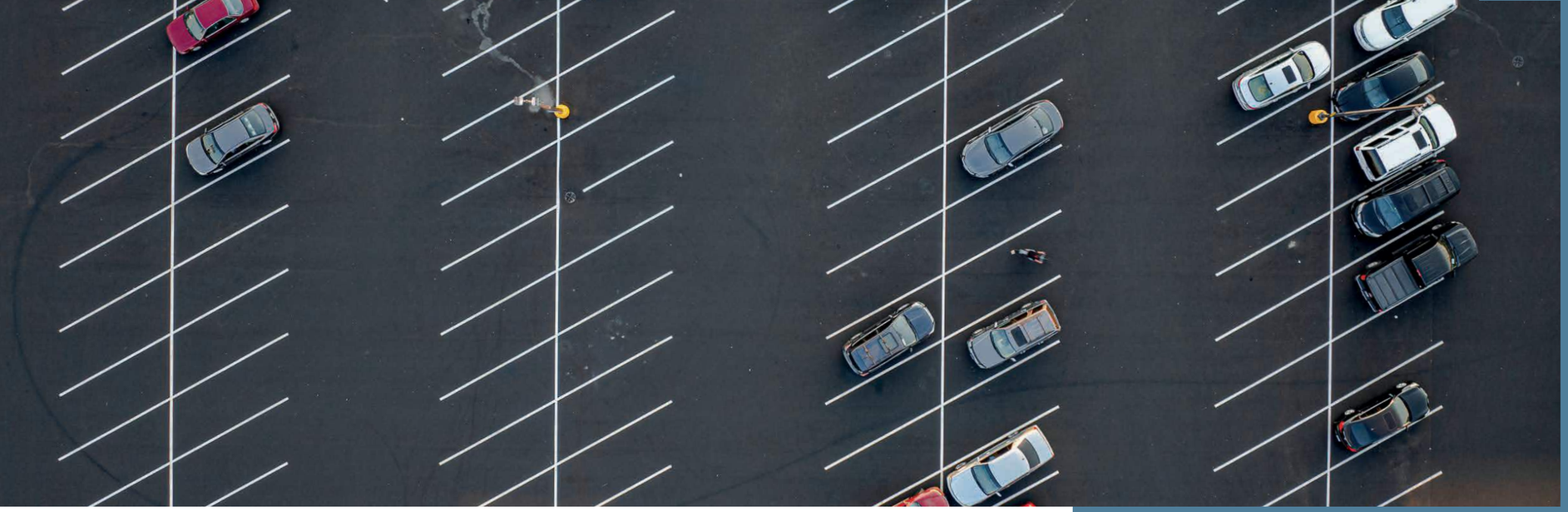
> - No restrictions on building heights in this area
> - No zoning restrictions in this area
> - Improved infrastructure for non-car transport, like wider sidewalks, dedicated bike lanes, and improved transit access
>
> Thanks for your consideration.
>
> Ariel

The State of Parking Mandates in Washington

Minimum parking requirements are paving over Washington, regardless of how much residents or businesses actually need.

Catie Gould, October 2024

Sightline INSTITUTE



PARKING MATTERS

How parking mandates silently shape our communities

Look at just about any city's zoning code and you'll find a table of parking ratios, usually dating back 50 to 80 years, mandating a predetermined number of parking spaces for all new buildings

—and for every new bedroom, church pew, or bowling lane. If new development built "adequate" off-street parking, the thinking went, cars and curbsides could be managed.

But one-size-fits-all mandates, determined by city planning offices, were the wrong tool for the job. Guessing at the right numbers, most jurisdictions erred on the side of excess. Beyond creating an oversupply—parking that doesn't get used—mandating too much parking carries a raft of unintended consequences. Too much required parking outlaws the kinds of buildings that define cities' historic walkable neighborhoods, blunts housing construction and drives up home prices and rents, and increases barriers for entrepreneurs who want to invest in their community. Instead of managing on-street parking, these regulations have locked cities into patterns of sprawling development that makes traveling without a car impossible. In short, parking mandates have silently shaped how we live and how we get around.

Mandatory parking minimums reveal a failure of centralized control over something that any homeowner or business owner knows varies from block to block. These regulations fail to see, for example, the single mom who, like 40 percent of Wenatchee households, has no need for the second parking space the government requires her to pay for in her rent. They dismiss the local entrepreneur with an idea that could light up a vacant building, if that entrepreneur were legally allowed to operate their business with 14 on-site parking spaces instead of 23. Ultimately, these mandates rob Washingtonians of their right to decide for themselves how much parking they really need.

Consequently, Washington cities have inherited a mess where housing is scarce, commercial vacancies abound, and automobile dependency is baked into legal codes. This report aims to bring these arbitrary regulations to light and show how these rules from the past still shape life today in communities across the state.

Table of Contents

Acknowledgements

Thank you to the many people who contributed to data collection for this report, fact checking, and editing, including Sightline staff and Tony Jordan, Joseph Alamo, Ethan Chan, and others at the Parking Reform Network. Thank you to Sam Vogt for graphic design.

Methodology

For this report, researchers reviewed minimum parking requirements for key housing and commercial categories across Washington's largest 44 cities and 10 counties. Together, these jurisdictions regulate the land that is home to 75 percent of the state's residents.

While nearly every city has at least a handful of downtown blocks where providing parking is optional, we chose to compare the base tables that set regulations city- or countywide. These ratios are the starting point from which any reductions to required parking must work (often in percentages) and are easiest to compare across borders. For the handful of jurisdictions that had no base tables but instead set unique parking mandates for each zone (for example, Redmond currently does this across 50 zones), we selected the highest requirement.

After compiling parking ratios, we applied them to a hypothetical building to make them easier to compare. Most values were reported per home or other fractional size, but some categories such as daycares and schools were more easily compared as a whole building. We deducted 10 percent of a building's total footprint (gross floor area) to get net floor area (subtracting corridors, closets, etc.) for jurisdictions that defined codes that way. We included guest parking and loading spaces where specified in the base tables. In practice, jurisdictions would round to the nearest whole parking spot, but we opted to note fractional spaces to demonstrate the variation between local governments.

We collected this data from August 2023 to August 2024 and spent much of that time reaching out to cities and counties to verify and clarify their requirements. We are grateful to the dozens of planning departments that took the time to give us feedback throughout the process.

Although zoning codes are constantly evolving, we hope this report serves as a useful point-in-time look at the state of parking mandates in Washington.

Full data is available at sightline.org/ParkingReport

Arbitrary and Excessive Parking Mandates in Washington State

Local laws lock communities across the Evergreen State into more pavement and sprawl, barriers to business and homebuilding, and high rents.

Sightline analyzed zoning codes in 54 jurisdictions, representing regulations for land use where three-quarters of Washingtonians live. We found that parking ratios vary widely across city and county lines, but that Washington communities consistently mandate an excess of parking that is out of sync with people's actual car ownership and counterproductive for local homebuilding and business development.

Barkley Village, Bellingham, Washington. Photo: David Ryder

KEY FINDINGS

Mandated parking spots exceed cars Washington renters own

Fifty-eight percent of all Washington renter households own one or no cars, but in most cities and counties, it is illegal to construct a home with only one parking spot.

Six out of every ten jurisdictions surveyed required even studio apartments to supply more than one parking space per unit, while two out of ten require that studios come with two parking spaces apiece—overbuilding parking for most residents.

Mandated parking spots also outnumber the cars Washington homeowners own

One in four homeowner households in Washington have one or no cars, but nearly all jurisdictions (91 percent) require two or more off-street parking spaces for every detached home.

Four jurisdictions required **three or more parking spaces** for single-detached houses, though only 35 percent of homeowner households have more than two cars.

Excessive parking mandates undercut less expensive, "middle housing" home choices

Twenty-eight percent of Washington cities and counties have made parking optional for accessory dwelling units (ADUs). But only in Spokane are duplexes granted the same flexibility.

Family-friendly apartments pay a parking penalty

The more bedrooms, the more parking required. Across the state, **59 percent** of localities require additional parking for larger apartments, increasing barriers for family-sized units.

Parking mandates hinder local businesses, especially in historic downtowns

The typical office or retail store in Washington is required to dedicate more space to parking than to the building itself. The most common mandate for restaurants requires **three times as much space** to be paved over for parking than the dining establishment itself.

Converting a former office to a retail store would require providing additional parking in most cities and counties. A restaurant would require more parking in nearly every jurisdiction.

Parking mandates vary widely between jurisdictions, but generally exceed actual use

For the same types of businesses, places with the highest minimums require **3 to 12 times** more parking spaces than their neighbors with the lowest minimums.

Pasco, Washington. Photo: Jake Parrish

A history of guesswork

Off-street parking requirements are a recent invention, even compared to zoning itself.

New York City, famous for the first modern zoning ordinance in the United States in 1916,[1] would not adopt parking minimums until 1950. After World War II, parking mandates spread rapidly alongside other exclusionary zoning practices. By 1972, 99 percent of American cities surveyed had set rules around requiring parking for new buildings.[2]

Cities largely took a guess at how much parking to require. Like a game of telephone, planning departments often simply copied neighboring cities' guesses without questioning the origin of the numbers. One study found that 45 percent of senior planners and directors ranked "survey nearby cities" as the most important information when setting parking mandates. The second most influential resource for setting parking rules was the Institute of Transportation Engineers' (ITE) Traffic Engineering Handbook. A share of planners admitted that they "didn't know" which source of information to use, and only 3 percent used locally commissioned studies.[3] This practice is still common today.

Cities that adopt parking minimums that correlate with ITE's Parking Generation manual do so at their own risk. The studies informing ITE's standards typically measure peak demand at a handful of suburban locations with abundant free parking and little transit service. Half of the parking generation rates from the 1987 edition were based on four or fewer studies. And 22 percent were based on just one study.[4]

Even with additional data points, parking demand often has no statistical correlation to variables such as store size. The wide-ranging data indicates that it's not possible to set one parking ratio to apply to all businesses. Take this study on fast-food restaurants: a ~2,600-square-foot diner was observed to use anywhere from 16 to 42 parking spaces. The largest restaurant had half the parking demand of some smaller restaurants. Despite the ITE's warning to use caution, cities still adopted "average" rates as legal minimums, mandating an oversupply of parking for many of the businesses the standard was based on.

How copy + paste from the ITE leads to excess parking, hurting businesses

Adopting average peak demand as a minimum standard forces many businesses to pave more parking spots than they use.

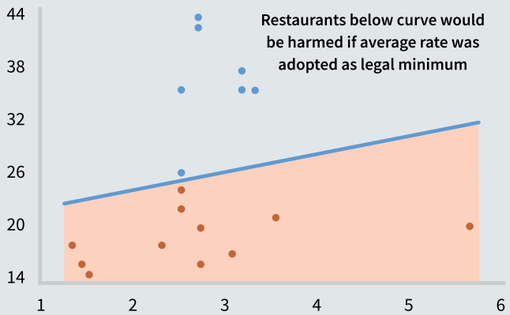
Fast Food Restaurant with Drive-in Window (Land Use 836)

Peak Parking Spaces Occupied vs: 1,000 Gross Square Feet Leasable Area On a Weekday

Parking Generation Rates

Average Rate	9.95
Range of Rates	3.55 - 15.92
Standard Deviation	3.41
Number of Studies	18
Averaae 1.000 GSF Leasable Area	3

Data Plot and Equation *Caution: use carefully, low R^2*



Institute of Transportation Engineers, Parking Generation, 2nd edition (Washington, DC 1987) p. 146

Parking mandate guesswork comes with real-world consequences

Selah, Washington, a small town outside Yakima, requires over twice as many parking spots for mosques as for churches, synagogues, and other temples. Is this religious discrimination? No; like many city parking mandates, those values were copied and pasted from the Institute of Transportation Engineers' (ITE) *Traffic Engineering Handbook.*

Churches, Synagogues, Temples
8.37 spaces / 1,000 sq ft

Mosques
17.32 spaces / 1,000 sq ft

The high cost of excess parking

Despite 99 percent of parking spots in the United States being free to use, they come with costs that we all bear.

Parking is expensive to build. On the low end, a surface parking lot might cost $5,000 to $20,000 per space. A multilevel parking garage can cost $60,000 (or more) per spot. New Sound Transit park-and-ride stations in Kent, Auburn, and Sumner ballooned to $240,000[5] per parking spot.

Those costs are passed down, rolled into the price of food, rent, and taxes, whether you park a car there or not. Every parking spot per home can increase rent by 12.5 percent[6] (or more than $200 per month[7]).

Parking costs us in dollars and space. A good rule of thumb is that parking lots are forced to be as large as the building they serve when mandates reach three parking spaces per 1,000 square feet, with 330 square feet[8] for each space. That is a common value. Of the localities we studied, 61 percent required at least that much parking for offices and 80 percent required that minimum for stores. Restaurants have it even worse: the typical jurisdiction requires parking lots to be 3.3 times larger than the eatery itself.

Mandates to pave and pressure to sprawl: Parking takes up valuable space

Local laws often mandate far more space for parking than the size of a building or business. For certain uses it's typical to see mandates for parking that takes up twice or three times the size of the interior. It's common for jurisdictions to mandate three, six, or even ten spots required per 1,000 square feet of interior building space.The result is excess pavement, demolitions to make way for parking, sprawling outward to open spaces—or not building at all.

No mandated parking

As much parking as building space
3 spots per 1,000 sq ft

Twice as much parking as building space
6 spots per 1,000 sq ft

3.3 times as much parking as building space
10 spots per 1,000 sq ft

"If we had to build off-street parking at today's standards the entire city would be covered in asphalt."

Jacob Gonzalez
Planning Manager in Pasco, WA

The Ninebark Apartments provide 1.6 parking spaces per home.

The site would require even more parking if located downtown after Washougal City Council increased parking mandates in 2023.

Image: Ninebark Apartments

Parking mandates overestimate car ownership and undercut homebuilding

Every year across Washington, homes for *people* are denied because they don't also provide enough homes for *cars*.

Homes go unbuilt across Washington because of parking mandates

In 2023, the Vancouver Housing Authority was forced to cut 40 subsidized homes from a proposed Washougal project after the city council doubled the off-street parking required downtown.

Parking mandates can make middle housing infeasible, especially on small lots

A study found that required parking made ADUs impossible on 85 percent[9] of Kent's single-detached house lots.

Parking mandates limit property owners' options to build homes

Schoolteacher Marijean Rak moved to Mount Vernon to care for her mother, but city requirements for four parking spaces, including a two-car garage, made it impossible to build a modest, 1,000-square-foot, single-story home on a vacant lot. "This requirement is cost-prohibitive and doesn't align with the character of the neighborhood," she said, pointing out that most of the existing homes have a one-car garage or no off-street parking at all.[10]

Parking mandates hurt renters disproportionately

Each parking space can add $200 per month in rent, whether tenants need that parking space or not. Many don't, since 58 percent of Washington renter households own one or zero cars.[11] Even when forgoing a car or bedroom to save money, tenants are forced to pay for parking. All but one jurisdiction required an off-street parking spot for studio apartments; studios in 22 percent of Washington localities require two or more.

Most kids don't drive a car, but parking mandates tax their bedrooms—preventing family-sized apartments

Family-sized units are commonly hit with higher parking mandates; 59 percent of Washington jurisdictions bump up parking mandates by number of bedrooms, encouraging builders to opt for smaller units and making it harder to find apartments with three or more bedrooms.

	ADU	Single-detached home	Duplex	Studio apartment	3-bedroom apartment
Most Common	**1**	**2**	**2**	**1**	**2**
Seattle	0	1	1	1	1
Spokane	0	0	0	0	0
Tacoma	0	2	2	1.5	1.5
Vancouver	0	1	1	1	1
Bellevue	0	2	1.8	1.2	1.8
Kent	1	2	2	2	2
Everett	1	2	2	1	2
Renton	1	2	1.6	1.1	1.7
Spokane Valley	1	2	2	1.1	1.5
Yakima	1	2	2	2	2
Kirkland	0	2	2	1.2	1.8
Bellingham	1	2	2	1	2
Kennewick	1	2	2	1.1	1.6
Redmond	1	2	2	1.2	2
Bremerton	0	2	2	1.5	2
Puyallup	1	2	2	2	2
Issaquah	0	1	1	1.2	1.2
Mount Vernon	1*	4	4	1	2
Pierce County	1	2	2	1.5	2.3
Snohomish County	1	2	2	2	2
King County	0	2	2	1.2	2
Clark County	1	2	2	1.5	1.5
Kitsap County	1	3	2	2	2
Spokane County	1	2	2	1.6	1.6
State Average	**0.7**	**2**	**1.9**	**1.3**	**1.8**

** assumes existing residence has 2 parking spots already, for total of 3*
See appendix for more information.
Full data available: ***sightline.org/ParkingReport***

Parking mandates are a tax on businesses

Washington state's parking regulations are proving a significant hurdle for small businesses, historic sites, and urban development.

Beloved establishments often can't be rebuilt today because of parking mandates

Port Townsend is home to the state's oldest grocery store, Aldrich's Market. After fire destroyed the original 1889 building, a historic exemption allowed the owners to rebuild without modern parking mandates—and that flexibility was expanded citywide through a 2024 interim parking ordinance. But businesses in other cities aren't as lucky; most Washington communities require two to six parking spots for every 1,000 square feet of a similar retail store.

Parking minimums often stand in the way of repurposing existing buildings

To convert an underutilized office to a retail store, 54 percent of cities and counties in our study would require more parking. Starting a café in a vacant space is even more difficult; twice as much parking is typically required for restaurants than retail.

Parking mandates can keep communities from critical amenities: Take daycares

Washington requires daycare centers to provide 75 square feet of outdoor play area per child. Local governments add on an average 87 square feet of parking per child. These rules vary by jurisdiction: 4.5 spots required for a daycare in King County; 12 in Pierce County; 36 in Puyallup.

The rules vary wildly and interpretation is up for grabs

In Bothell, would a neighborhood grocery store like Aldrich's be considered "retail" or a "convenience store"? The latter requires twice as much parking despite not being defined in code. One-size-fits-all requirements for recreation facilities in Redmond and Mercer Island would require space-intensive bowling alleys to provide an equivalent 12 parking spots per lane.

Deviating from arbitrary parking mandates can still be contentious, slowing projects and increasing costs

Parking requirements, city waivers, and local appeals held up permits for Seattle's new Alki Elementary School for over a year.

	Office (1,000 sq ft)	Retail (1,000 sq ft)	Restaurant (1,000 sq ft)	Bowling alley (per lane equivalent)	Daycare (50 children)	Elementary school (500 children)
Most Common	**3.3**	**3.3**	**10**	**5**	**10**	**70**
Seattle	1	2	4	2.4	12.5	48
Spokane	0	0	0	0	0	0
Tacoma	3	2.5	6	5	10	31.2
Vancouver	2.5	3.3	4	5	14.2	68.8
Bellevue	3.6	4.5	12.6	**	**	**
Kent	4	5	10	5	10*	80
Everett	2.5	2.5	5	3	9.2	**
Renton	1.8	2.3	5	2	14	70
Spokane Valley	2	2.9	4	3.4	5	26
Yakima	5	3.3	12	5	18.3	91.7
Kirkland	3.3	3.3	10	**	**	**
Bellingham	2.9	5	8	4	10*	37
Kennewick	4	5	10	4	15	70
Redmond	4	4	9	11.9	10	**
Bremerton	3.3	6	6.7	5	12	58.6
Puyallup	3.3	3.3	10	5	36	43.4
Issaquah	3.3	5	10	2.4	9.8	225.7
Mount Vernon	3	3	9	5	10*	39
State Average	**3.1**	**3.7**	**7.7**	**4.3**	**13.2**	**65.8**

** Also requires an unspecified number of pick-up/drop-off spots, not included in total. ** Director (use not specified; planning department determines on case-by-case basis) -- See appendix for more information*
Full data available: ***sightline.org/ParkingReport***

The original 1913 school had no off-street parking, but code today would require 48 spaces. With Issaquah at the high end, requiring 226 spots (roughly 1.7 acres—larger than the Alki site itself), we found 56 percent of Washington cities and counties would require more parking to rebuild a similar-sized school.

If Exceptions Are the Rule, the Rule is Flawed

Planning departments know that parking mandates are set too high, which is why exceptions keep getting added to city codes over the years.

These carve-outs satisfy the practical need to make building feasible for properties lucky enough to qualify, but they can force builders into uncertain discretionary processes. Even when the city itself is the applicant, as with Seattle's Alki Elementary, bending the rules can be controversial. Even the "optional" minimums in cities such as Lacey and Lakewood require a special approval to supply less parking than the suggested ratios. We categorized this as a waiver process.

Piling on exceptions to the rules makes zoning codes more complicated. Even an educated city planner can misinterpret how much parking is actually required. That's what happened in Washougal. City officials thought they were adopting the same downtown parking standards as neighboring Camas[12], but they overlooked a small section of Camas's code. That section, "Units of measurement," gave steep parking discounts to multistory buildings, cutting requirements for new buildings by half or more. Without copying the exception, Washougal inadvertently outlawed within its own city limits the kind of in-demand new housing springing up in Camas.

Parking mandates are as specific as they are arbitrary

Similar uses, like libraries and archives, can require very different space for parking. Categories are tied to building area or to units or employees—or a combination! It's not uncommon for jurisdictions to specify parking ratios for over a hundred different building types. Here's a snapshot from the City of SeaTac:

Butterfly or moth breeding facility
1 parking spot per 250 square feet

College dormitory
1.5 parking spots per bedroom

Hospital
1 parking spot per bed plus 5 spots for every 2 employees

Tavern
1 parking spot per 250 square feet of leasable space

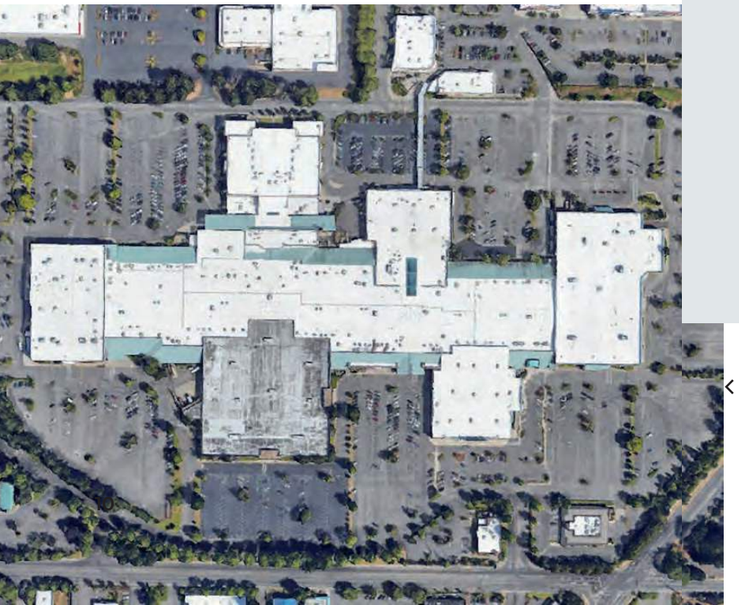
Micro-winery or brewery
1 parking spot for every 40 square feet of tasting room space plus 1 per employee

Library
1 parking spot per 200 square feet of building

Public archive
1 parking spot per 400 square feet of waiting or review area plus 1 per employee

Cemetery
1 parking spot per 40 square feet of chapel plus 1 per employee

Bowling alley
5 parking spots per lane plus 1 per employee



Rules prevent new buildings, even on vast, underused parking lots

Olympia's Capital Mall can't transform its unused parking lots into a people-oriented urban center[13] under current zoning rules that deem it "underparked," with 214 fewer spaces[14] than required for a shopping center.

Pasco, Washington. Photo: Jake Parrish

Right-sizing parking lots:

Parking reform in Washington

Washington cities have begun rethinking these rules. So far in 2024, Port Townsend and Spokane have eliminated parking mandates altogether, returning decisions about parking needs to individual property owners.

Other cities like Bellingham and Redmond are in the process of reducing or removing their parking mandates.

When given full flexibility, developers frequently still choose to build parking but in different numbers than zoning codes prescribe. A comprehensive study of Seattle's 2012 parking reform found that 70 percent of multifamily buildings still chose to build off-street parking. The flexibility was widely used: 59 percent of new homes benefitted from reduced construction costs by providing fewer parking spaces than previously mandated.[15] Across the 868 new developments studied, the market built a total of 40 percent less parking than what had been required. This correction was exactly in line with an earlier King County study that found that 40 percent of parking spaces in multifamily buildings sat empty overnight.[16]

Builders in small Washington cities have also taken advantage of full flexibility. The first new building to be permitted in Bellingham's Old Town district after repealing parking mandates in that zone included 2.3 times the number of homes (or 48 new dwellings) as would have been allowed before. If it turns out that there aren't enough parking spaces to attract tenants, builders have multiple options to provide additional parking on neighboring properties.[17]

Zoning is ultimately just one barrier to making building feasible. Jesse Bank, director of Spokane's Northeast Public Development Authority (PDA), has been wrestling with how to provide more parking in a proposal for a building that will house the future PDA office, workforce housing, and a 24-hour daycare center. The city no longer requires parking, but kids still need to be safely dropped off at daycare, and an appraiser determined that fewer than one parking space per home could decrease the building's ultimate value by as much as $1 million dollars. "Zoning is out of the way, but it's only one of five or six things," Bank said.

While Bank is trying to find a nearby property for additional surface parking in the short term, he imagines that the need for parking could decrease over time. A rapid bus line will be installed out front in the next two years, likely spurring additional investments in the neighborhood and making the street more walkable as a whole.

As financial lenders and roadways evolve over time, the zoning code is written to allow the surface parking lot built today to transform into a community building when the conditions are right. By merely restoring property owners' right to determine their own parking needs, Spokane has allowed itself to respond to the changing market when the time comes.

To unlock the same kind of innovation and opportunity that Spokane, Bellingham, and Port Townsend are eyeing for their communities, cities and counties across the state—and Washington state itself—may want to take another look at their own zoning codes. The origin of any town's parking mandates is likely to have been lost long ago, but these ratios continue to shape the places we love. The decisions we make now will determine whether the neighborhoods of the future have abundant housing, local businesses, and community spaces—or an abundance of unused parking lots.

Notes

[1] M. Nolan Gray, Arbitrary Lines: How Zoning Broke the American City and How to Fix It (Washington, DC: Island Press, 2022).

[2] Robert A Weant and Herbert S. Levinson, Parking (Washington, DC: Eno Center for Transportation, 1990), https://enotrans.org/wp-content/uploads/2023/02/Parking-Full.pdf.

[3] Donald C. Shoup, The High Cost of Free Parking, updated ed. (Chicago: American Planning Association Planners Press, 2011).

[4] Donald C. Shoup, "Truth in Transportation Planning," Journal of Transportation and Statistics 6, no. 1 (2003): 1–16, http://shoup.bol.ucla.edu/TruthInTransportationPlanning.pdf.

[5] Stephen Fesler, "Sounder Needs More Service, Not More Parking Garages," The Urbanist, February 9, 2023, http://www.theurbanist.org/2023/02/09/sounder-needs-more-service-not-more-parking-garages.

[6] Todd Litman, "Parking Requirement Impacts on Housing Affordability," Victoria Transport Policy Institute, January 20, 2009, reconnectingamerica.org/assets/Uploads/parking_housing_2009.pdf.

[7] Seth Goodman, "How Much Does One Parking Spot Add to Rent?" Reinventing Parking, June 2, 2015, https://www.reinventingparking.org/2015/06/how-much-does-one-parking-spot-add-to.html.

[8] Donald Shoup, "The Pseudoscience of Parking Requirements," Zoning Practice 37, no. 2 (2020), https://dallascityhall.com/departments/sustainabledevelopment/planning/DCH%20Documents/code%20amendments/parking%20code/APA_%20Practice_Parking_Reform_February%202020.pdf.

[9] Catie Gould, "Unlock Middle Housing with Parking Reform," Sightline Institute, March 18, 2024, https://www.sightline.org/2024/03/18/unlock-middle-housing-with-parking-reform/.

[10] Mount Vernon City Council meeting, May 8, 2024, https://www.youtube.com/watch?v=U3B-GYL-hu0M.

[11] U.S. Census Bureau, Tenure by Vehicles Available, American Community Survey 5-Year Estimates Detailed Tables, 2022, https://data.census.gov/table/ACSDT5Y2022.B25044?q=Table%20B25044&g=040XX00US53.

[12] Catie Gould, "How Parking Ratios Kill Homes," Sightline Institute, December 6, 2023, https://www.sightline.org/2023/12/06/how-parking-ratios-kill-homes/.

[13] Engage Olympia, "Capital Mall Triangle," 2024, https://engage.olympiawa.gov/capital-mall-triangle.

[14] City of Olympia, "Capital Mall Triangle Subarea Plan & Planned Action EIS: Existing Conditions Report," December 2022, https://engage.olympiawa.gov/17664/widgets/55409/documents/37948.

[15] Catie Gould, "Parking Reform Legalized Most of the New Homes in Buffalo and Seattle," Sightline Institute, April 13, 2023, http://www.sightline.org/2023/04/13/parking-reform-legalized-most-of-the-new-homes-in-buffalo-and-seattle.

[16] King County Metro, "Right Size Parking, Final Report," August 2015, https://metro.kingcounty.gov/programs-projects/right-size-parking/pdf/rsp-final-report-8-2015.pdf.

[17] Catie Gould, "Bellingham's Parking Reform Pilot Pays Off," Sightline Institute, May 1, 2024, http://www.sightline.org/2024/05/01/bellinghams-parking-reform-pilot-pays-off.

Appendix

Washington Residential Parking Mandates

ADU = Lot size: 5,500 sq ft; Unit size: 600 sq ft; 1 bedroom; First ADU on property

Single-Detached home = Lot size: 5,500 sq ft; Unit size: 1,800 sq ft; 3 bedroom

Duplex = Lot size: 5,500 sq ft; Unit size: 1,400 sq ft; 3 bedrooms

Apartments: 6 units in building; Studio size: 500 sq ft

Washington Commercial & Civic Parking Mandates

Director = Use not specified; Planning department determines on case-by-case basis

Office = Ground floor; Non-customer facing

Retail = 900 sq ft; Open to customers

Restaurant = All indoor; 600-sq-ft dining space; 40-person capacity

Bowling alley = 19,061-sq-ft building; 16 lanes; 5 employees; 100-person capacity; No dining area

Daycare = 50 children; 10 staff; 4,000-sq-ft facility; Indoor play area: 90 percent of gross floor area; No business vehicle on-site

Elementary school = 90,278-sq-ft building; 500 students, 70 employees, 37 teachers; 26 classrooms, 11 offices; 1,310-sq-ft office space; Auditorium capacity: 275,384 people, 3,840-sq-ft; No school buses parked on-site

From: Ruth Lipscomb
To: PlanningCommission
Subject: Comments about Wilburton LUCA
Date: Sunday, December 8, 2024 10:09:21 PM

Hello Planning Commissioners,
I live in South Bellevue and often drive to the South Bellevue Park & Ride in order to take the 2 Line to events in Bellevue and Redmond. I look forward to EasTrail being completed all the way from my neighborhood near Factoria into the core of Bellevue. That trail will become my main access to downtown, without needing to drive at all.

I currently visit Wilburton often for shopping and medical appointments. Once I can get there directly by bike, I don't plan to ever drive my car there. Please make sure that Wilburton is as friendly as possible for people biking and walking to and through it, and do whatever you can to discourage car use in that transit- and trail-rich area.

A key step should be to eliminate parking mandates. That will keep the cost of housing lower and make it easier to build densely, ideally with plenty of family-sized housing units. This is the type of neighborhood that I would love to downsize into when I stop driving. Please make that possible and affordable by requiring developers to build housing for people, not storage for cars.
Thank you.

Ruth Lipscomb
101 Cascade Key, Bellevue, WA 98006
425-603-0152

From: Raymond Zhao
To: PlanningCommission
Subject: Written Comment for 12/11 Meeting
Date: Monday, December 9, 2024 1:04:07 AM

Dear Commissioners and staff,

I am Yuanmeng Zhao, a resident of Overlake Village, which is a neighbourhood in Redmond that aims to be walkable. I would like to thank the Commissioners and staff for working on and reviewing the Wilburton LUCA, and I would like to give feedback based on my experiences in Overlake Village.

Firstly, I find the surface parking lot maximum requirements agreeable in the sense that surface lots immediately create a less walkable neighbourhood and also decrease the land's resiliency against heavy rainfall.

I am also in favor of the removal of 20.20.590 subsection I item 1.b, because I believe that businesses teaming up to share their parking is healthier for the future community of residents and allows for more opportunities to build housing, which is in short supply across all income levels.

Still, I question some of the parking requirements in the draft. In particular, 20.20.590 subsection I item 2. a. seems to have been changed from requiring developers to take the maximum of differing parking minimum requirements to a more vague statement that could in the worst case be interpreted as requiring developers to take a summation of differing parking minimum requirements. Considering that item 2. a. is for non-overlapping hours, I personally believe a wording such as "the property owner or owners shall take the maximum of the applicable individual parking minimum requirements and provide at least that many parking stalls" gives developers the most freedom to work under what I assume is the city's intended constraints.

Furthermore, I question the parking minimum requirements themselves. In particular, I wonder whether entries under 20.20.590 subsection F with parking minimum requirements of 4:1,000 nsf or higher are now outdated and unnecessarily high given the availability of drive-thru services, transitions into remote and hybrid work, and Wilburton's closeness to public transit options including buses and light rail. For reference, I live close to the B Line and the 2 Line, and have been able to fulfill the majority of my Bellevue and Redmond errands with those two routes alone.

Thank you,
Yuanmeng Zhao

From: Campbell Mathewson
To: PlanningCommission
Cc: Horner, Rebecca D; Steiner, Josh; Whipple, Nicholas; King, Emil A.
Subject: Comment for 12.11.2024 Planning Commission meeting re: Wilburton LUCA
Date: Monday, December 9, 2024 3:58:38 PM
Attachments: City of Bellevue Planning Commission 12.11.2024 Comment Letter.pdf

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Dear City of Bellevue Planning Commission,
Attached please find a copy of our comment letter for your meeting this Wednesday, December 11th. Thank you for your continued good work and for engaging with the community. Happy Holidays.

Sincerely,
Campbell Mathewson
Manager / Ditty Mathewson, LLC
11647 NE 8th Street / Bellevue, WA 98005
M: 206-910-2448 / E: cmathewson@cmrepartners.com

Ditty Mathewson LLC

December 8, 2024

Sent via email

Planning Commission
City of Bellevue
450 110th Ave NE
Bellevue, WA 98004
PlanningCommission@bellevue.gov

Re: Updated Wilburton Vision Implementation LUCA
Comments from Ditty Mathewson, LLC, property owner

Dear Planning Commissioners,

This letter is submitted in response to the version of the Wilburton Land Use Code Amendment ("LUCA") released on December 4, 2024 and as a follow up to the letter we sent on November 4, 2024 about our small, 22,564 sf, site located at 11635-11647 NE 8th Street. We appreciate the continued outreach and progress on the draft LUCA. Specifically, we commend the staff for working with us to make sure the code works for small sites (which are critical to helping create interesting neighborhood character in and amongst our larger neighbors). **There are still a few critical updates necessary to make the draft LUCA function on small sites like ours, sites we believe will be some of the first to develop and will create momentum in implementing the Wilburton Vision. We respectfully urge you to continue to make progress on these requests.**

- Amenity Points and FAR. As pointed out in our last comment letter, small tower sites are likely to have FARs at levels well above the modest base FARs in the code under either affordable housing Option A or Option B. The unlimited maximum FAR for residential uses is appreciated, but if there is not a viable and achievable mechanism for obtaining that bonus FAR, then residential towers will not get built on small sites. The current amenity framework and menu does not work for our site. It is too expensive and burdensome to earn the bonus FAR from a low base to a very high FAR. The best solution is a FAR exemption for residential uses in towers. If the City pursues a mandatory affordable housing program, then there will already be an affordable housing obligation. Any other amenity system makes the production of housing more expensive and seems to create a misalignment of the policy intent in Wilburton. This is a uniquely challenging issue for small tower sites because the proposed FAR levels are so high. The current draft of the code does not fix this problem.

  As you know, the Comprehensive Plan shows a need for 1,550 residential units per year until 2044. The City of Bellevue has been averaging 800 residential units per year. We encourage bold thinking to reach this 1,550 annual goal. Exempting residential FAR in towers is a meaningful move in the right direction.

- Driveway Standards. The update to LUC 20.25R.020.B.2.b.v(1) notes that on sites less than 100,000 sf, "Vehicular access onto these sites shall be provided from a flexible access corridor." However, flexible access corridors are 51' wide and include two 10' sidewalks and two 5' amenity zones (LUC 20.25R.020.B.3.d). This is entirely too wide for a driveway into a parking garage. On our small site, this width would eat up a disproportionate amount of developable area and will result in a loss of residential units. Instead, we suggest that the technical requirements for driveways in the Transportation Design Manual should apply to sites less than 100,000 sf.

- Development Agreements. Our site is connected to the Grand Connection via Eastrail. We request a modest adjustment to LUC 20.25R.010.D.5.b by adding a sentence at the end of this subsection that says, "A property is considered adjoining the Grand Connection if it is adjacent to Eastrail south of NE 8th Street and north of NE 4th street." This change will allow a few additional sites to pursue a development agreement to respond to site-specific challenges and seize opportunities to connect to the Grand Connection.

- Progress in Current LUCA. We want to specifically commend staff for making improvements to this version of the LUCA related to stepbacks, allowing open space to count toward amenity points, making reasonable adjustments to screening for above-grade parking, and clarifying cantilever allowances.

Thank you for your continued work on the Wilburton LUCA. We are excited about the future of this neighborhood, and we look forward to continued engagement with staff, the Planning Commission, and City Council. Please feel free to reach out with any questions.

Sincerely,

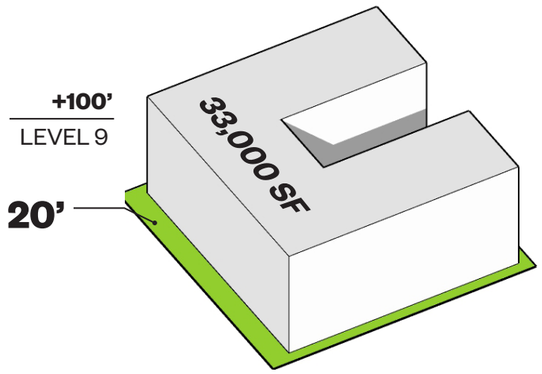
Campbell Mathewson
Manager – Ditty Mathewson LLC
11647 NE 8th Street, Bellevue, WA 98005
M: 206-910-2448
E: cmathewson@cmrepartners.com

Cc: Horner, Rebecca D RDHorner@bellevuewa.gov
Steiner, Josh JSteiner@bellevuewa.gov
Whipple, Nicholas NWhipple@bellevuewa.gov
King, Emil eaking@bellevuewa.gov

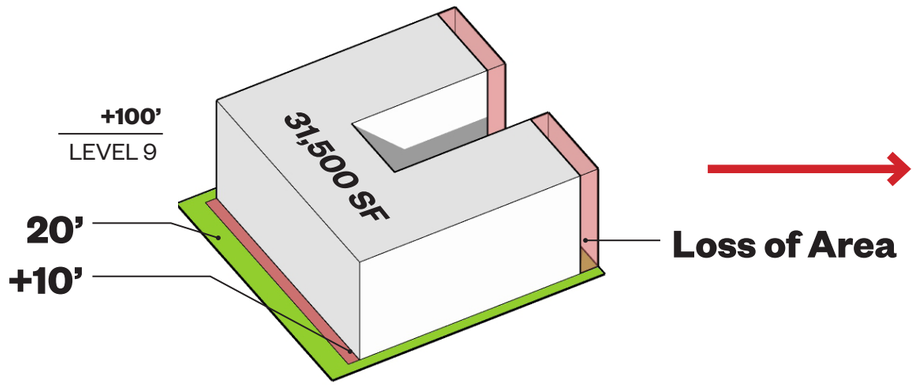
LOST DENSITY & CAPACITY

IMPACT OF EVERY ADDITIONAL 10 FEET REQUIRED

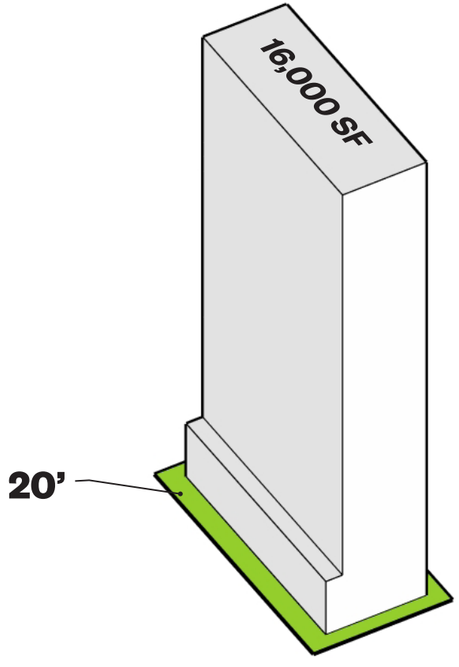
20’ ACCESS

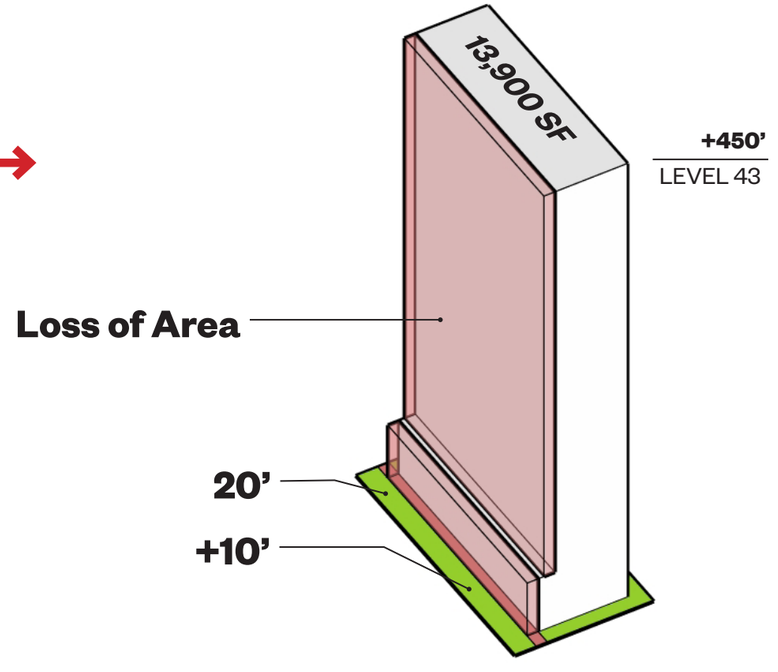


30’ ACCESS



EQUATES TO LOSS OF 14 UNITS / ACRE





EQUATES TO LOSS OF 160 UNITS / ACRE

- LOST OPPORTUNITY TO PLACE MORE PEOPLE NEAR SUSTAINABLE MODES OF TRANSPORTATION (EASTLINK, GRAND CONN. & EASTRAIL)
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- LESS RETAIL VIABILITY
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CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

WILBURTON = ~300 ACRES

EXAMPLES | CADY'S ALLEY

GEORGETOWN, WASHINGTON, DC

20'-25' WIDTH, COMBINED VEHICLE AND PEDESTRIAN/BICYCLE WAY

CLIENT NAME: **KGIP**
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~18’ WIDTH URBAN LANE

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1661 & 11671 SE 1ST STREET, BELLEVUE - SHOWN WITH LUCA-REQUIRED 51' FLEXIBLE ACCESS CORRIDOR

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

51' WIDTH FLEXIBLE ACCESS CORRIDOR

11
12-11-2024
2022065

From: Andrew Coates
To: PlanningCommission
Cc: Jessica Clawson; Steve Kramer
Subject: Planning Commission Comment Letter
Date: Tuesday, December 10, 2024 10:39:20 AM
Attachments: image001.png
KGIP Bellevue PC Letter 2024.12.10.pdf

Hi, attached is our comment letter for tomorrow's meeting. Thanks!

Andrew Coates | KGIP
Managing Director – Investment & Development
C: (425) 444-9585

SEATTLE | PORTLAND | BAY AREA

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

Subject: KG comments on Wilburton LUCA

Dear Bellevue Planning Commission Members,

First, thank you to the Planning Commission and City staff for the considerable work done on the LUCA and the Wilburton Code. We appreciate the thoughtful consideration given to stakeholder feedback and the time spent refining the proposed policies. We have made a lot of progress through this collaboration. However, after reviewing the latest draft of the code, there are still some key changes that need to occur to the LUCA in the area of site organization to effectively support housing density and reduce the costs of development in Wilburton to ensure the long-term success of the subarea.

The Planning Commission has rightly focused on supporting housing density and reducing development costs, as discussed during the November 6 meeting. However, it appears that the most recent draft of the code has not included several necessary changes to support housing density and reduced costs, particularly regarding transportation access corridors. In order to meet the city's goals for housing production and vibrant development, it is essential that the code be revised to reflect more flexibility in these areas.

Specifically, we ask that the following adjustments be made:

1) Allow for a fire lane or access lane to serve as a pedestrian corridor, reducing the required width from 30 feet to 20 feet.
2) Reduce pedestrian corridors from 14 feet to 10 feet.
3) Eliminate the flexible access requirement for small sites. Prior to the most recent code update, there has been no mention of a flexible access requirement for small sites. Requiring a 51-foot flexible access road for small sites will prevent redevelopment of small sites.
4) Reduce sidewalk widths from 10 feet to 6 feet, except on 116th or other arterial streets.
5) Reduce the flexible access corridor width from 51 feet to 37 feet.

The reduction of access corridor requirements alone could create hundreds or even thousands more housing units in the Wilburton subarea. Flexibility in the Wilburton Code is essential to achieving positive development outcomes. While it is important to have standards in place to guide development, it is equally critical to recognize that one-size-fits-all mandates may not be feasible for every project. For example, the requirement for a **51-foot flexible access corridor** on every single development in Wilburton is simply not practical in many instances. Similarly, the **10-foot sidewalk requirement** for every access corridor will create significant challenges for developers, particularly in smaller or more constrained sites.

We worked with our design team to show the impacts of every 4'-10' you slice out of a building and have enclosed a package showing the following.

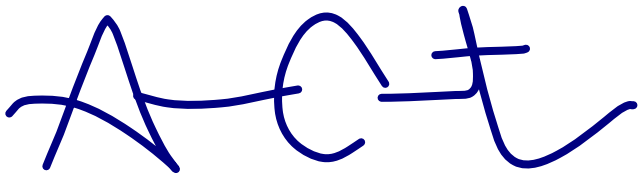
1) Density lost for every 4'-10' of increased access requirements (pages 1-7).
2) Real world examples of quality design for narrower access (pages 8-10).
3) How the flexible access requirement for small sites eliminates our ability to redevelop a small site we own in Wilburton. A site that can support approximately 200 apartment unit along EasTrail.

The above standard access requirements are policy choices with competing priorities and the merits of the trade-offs should be discussed. As written, the requirements create a higher bar to spur redevelopment, and if redevelopment occurs, they will create expansive separation between buildings and provide incrementally more light and air. Pedestrians will have a longer walk between buildings with more landscaping. If the requirements are reduced, more density will be achieved at a lower cost and quality urban design can create more intimate spaces for people. The question is, what is more important for Wilburton?

We are thankful for the Planning Commission and staff's focus on refining the code in a way that promotes both flexibility and successful development outcomes. By reducing unnecessary and rigid requirements, such as the size of transportation access corridors and sidewalks, we can create a more affordable and accessible environment for development while maintaining high standards for urban design, infrastructure, and public safety.

Thank you for your continued efforts and for considering our comments.

Sincerely,



Andrew Coates

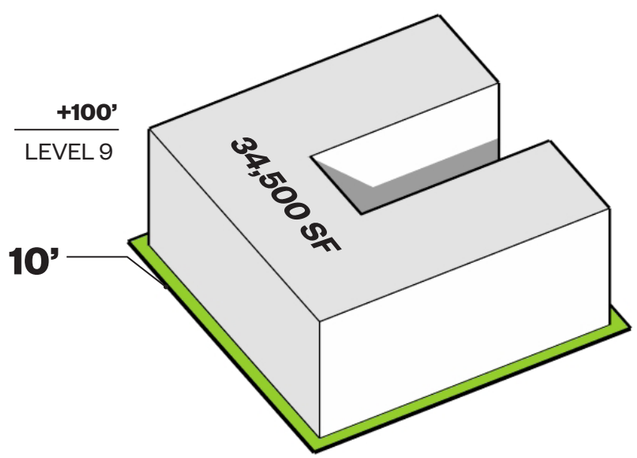
KG Investment Properties

- 600 116th Ave NE
- 430 116th Ave NE
- 420 116th Ave NE
- 400 116th Ave NE
- 316 116th Ave NE
- 11661 SE 1st Street
- 11671 SE 1st Street
- 11723 NE 8th Street

TYPICAL | PODIUM BUILDINGS UNDER 100’

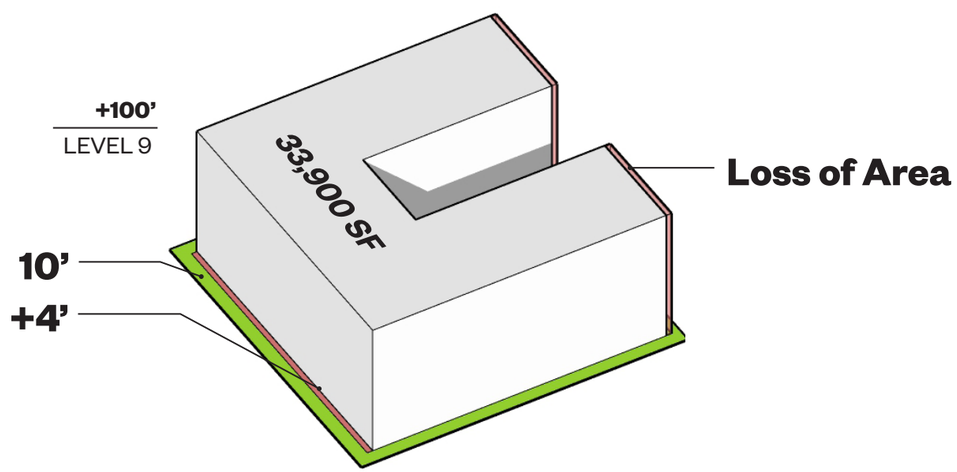
LOST DENSITY WITH & WITHOUT ADDITIONAL 4’ WALKWAY WIDITH

10’ ACCESS



378 UNITS
321 UNITS / ACRE

14’ ACCESS



371 UNITS (-7 UNITS)
315 UNITS / ACRE

- 20’ FIRE ACCESS VS. 30’ FIRE ACCESS (FOR SITES GREATER THAN 100K SF)
- EVERY 10’ OF FLEXIBLE ACCESS REQUIREMENTS
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 6 UNITS / ACRE

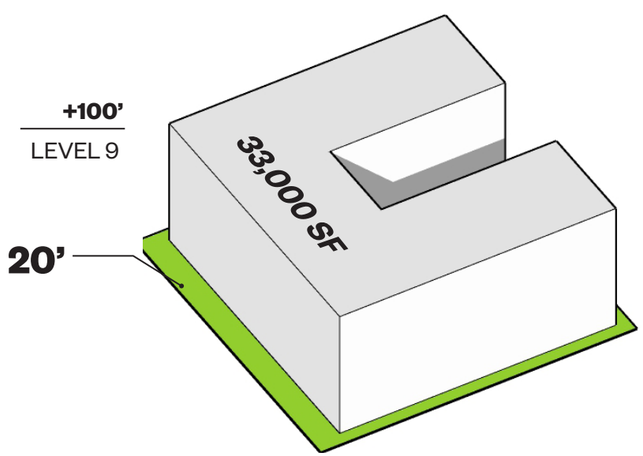
*BASED ON 0.85 BUILDINGS / ACRE AVG.

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

TYPICAL | PODIUM BUILDINGS UNDER 100’

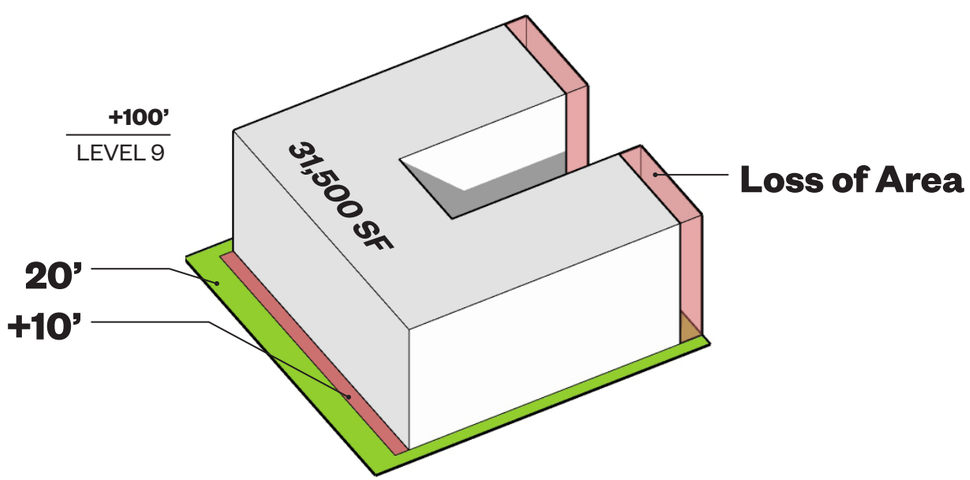
LOST DENSITY- FIRE LANE WITH & WITHOUT SEPARATE PEDESTRIAN ACCESS

20’ ACCESS



360 UNITS
306 UNITS / ACRE

30’ ACCESS



343 UNITS (-17 UNITS)
292 UNITS / ACRE

- 20’ FIRE ACCESS VS. 30’ FIRE ACCESS (FOR SITES GREATER THAN 100K SF)
- EVERY 10’ OF FLEXIBLE ACCESS REQUIREMENTS
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 14 UNITS / ACRE

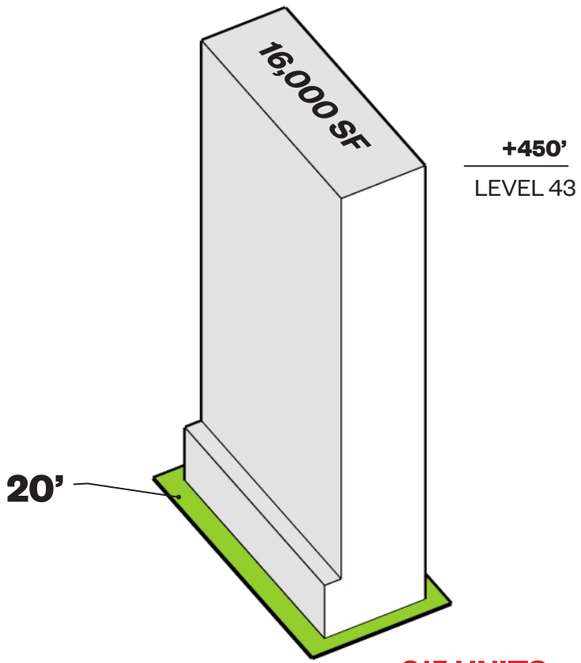
*BASED ON 0.85 BUILDINGS / ACRE AVG.

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

TYPICAL | HIGH-RISE RESI. @ 450’ HEIGHT

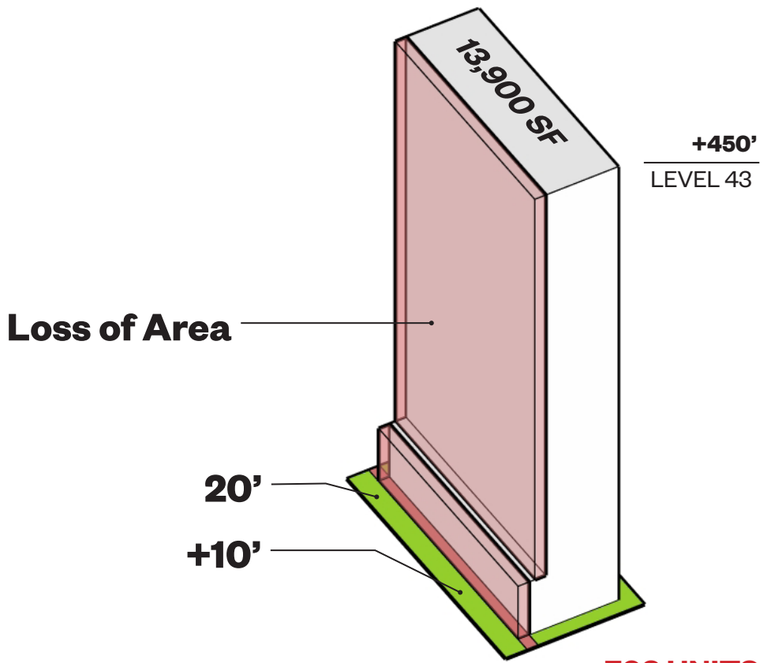
LOST DENSITY- FIRE LANE WITH & WITHOUT SEPARATE PEDESTRIAN ACCESS

20’ ACCESS



815 UNITS
1,222 UNITS / ACRE*

30’ ACCESS



708 UNITS (-107 UNITS)
1,062 UNITS / ACRE*

- 20’ FIRE ACCESS VS. 30’ FIRE ACCESS (FOR SITES GREATER THAN 100K SF)
- EVERY 10’ OF FLEXIBLE ACCESS REQUIREMENTS
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 160 UNITS / ACRE

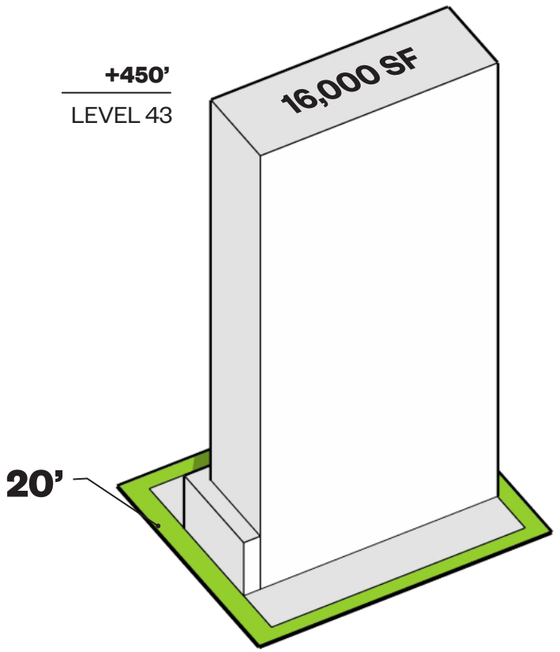
*BASED ON 1.5 BUILDINGS / ACRE AVG.

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

TYPICAL | HIGH-RISE RESI. @ 450’ HEIGHT

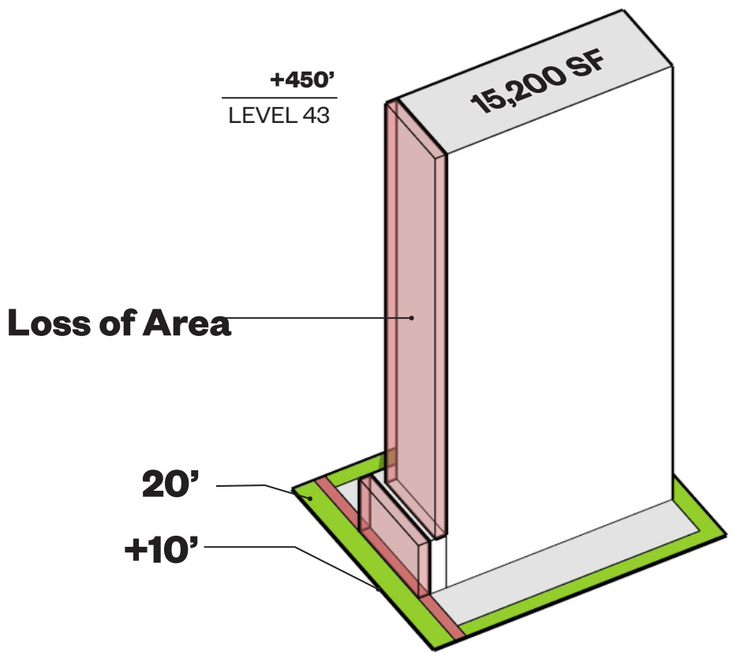
LOST DENSITY- FIRE LANE WITH & WITHOUT SEPARATE PEDESTRIAN ACCESS

20’ ACCESS



815 UNITS
1,222 UNITS / ACRE*

30’ ACCESS



775 UNITS (-40 UNITS)
1,162 UNITS / ACRE*

- 20’ FIRE ACCESS VS. 30’ FIRE ACCESS (FOR SITES GREATER THAN 100K SF)
- EVERY 10’ OF FLEXIBLE ACCESS REQUIREMENTS
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 60 UNITS / ACRE

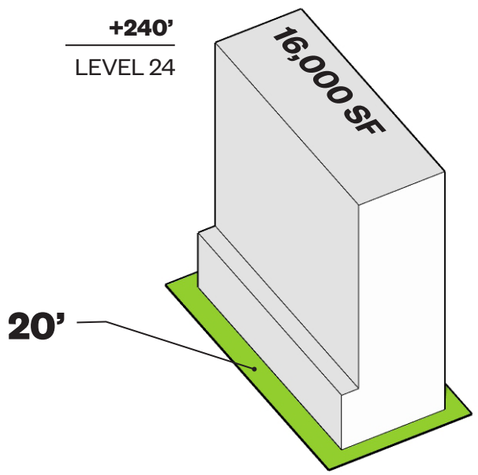
*BASED ON 1.5 BUILDINGS / ACRE AVG.

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

TYPICAL | HIGH-RISE RESI. @ 240’ HEIGHT

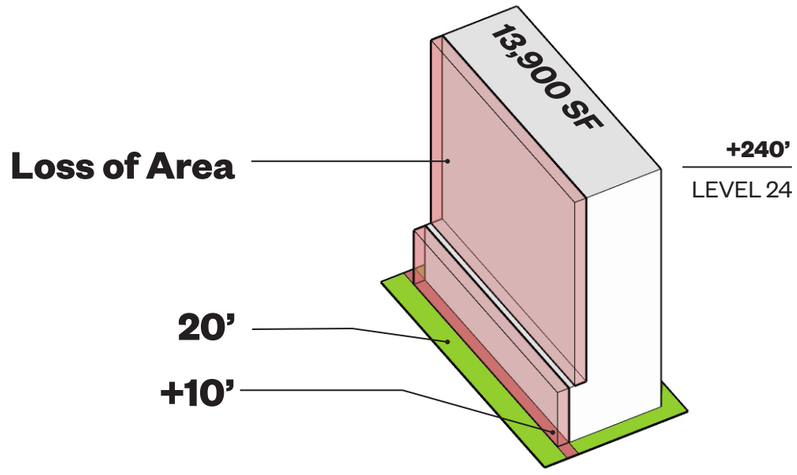
LOST DENSITY- FIRE LANE WITH & WITHOUT SEPARATE PEDESTRIAN ACCESS

20’ ACCESS



448 UNITS
672 UNITS / ACRE*

30’ ACCESS



390 UNITS (-58 UNITS)
585 UNITS / ACRE*

- 20’ FIRE ACCESS VS. 30’ FIRE ACCESS (FOR SITES GREATER THAN 100K SF)
- EVERY 10’ OF FLEXIBLE ACCESS REQUIREMENTS
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 87 UNITS / ACRE

*BASED ON 1.5 BUILDINGS / ACRE AVG.

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

TYPICAL | HIGH-RISE RESI. @ 240’ HEIGHT

LOST DENSITY- FIRE LANE WITH & WITHOUT SEPARATE PEDESTRIAN ACCESS

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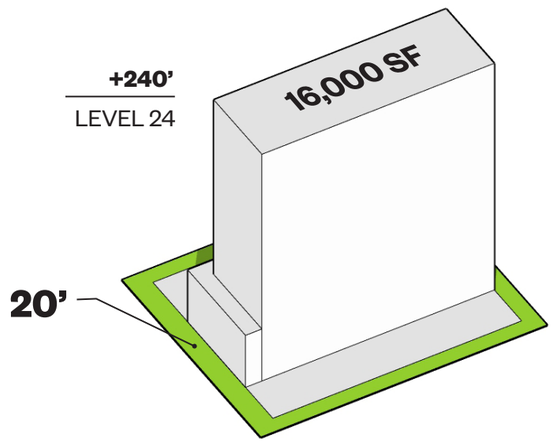

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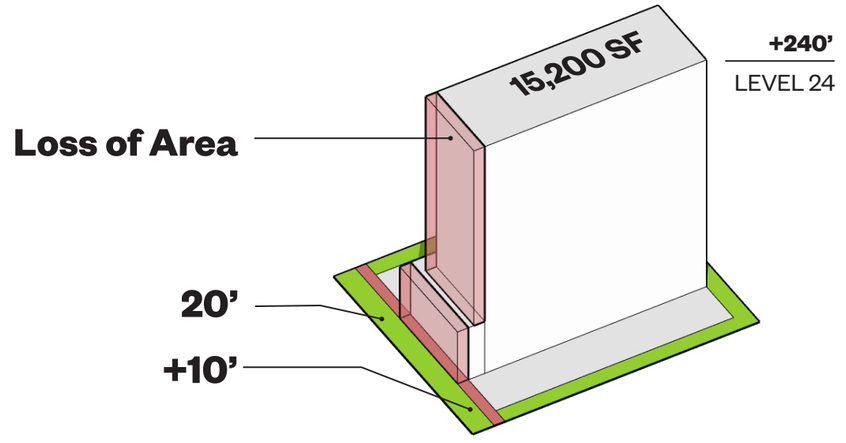
- WHEREVER SETBACKS OR DIMENSIONAL REQUIREMENTS ARE INCREASED ABOVE TYPICAL MARKET REQUIREMENTS

EQUATES TO LOSS OF 33 UNITS / ACRE

*BASED ON 1.5 BUILDINGS / ACRE AVG.

30’ ACCESS

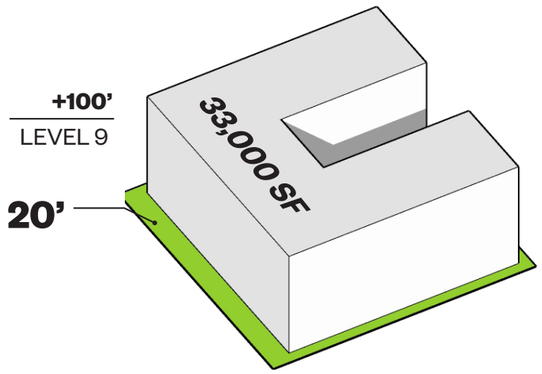


426 UNITS (-22 UNITS)
639 UNITS / ACRE*

LOST DENSITY & CAPACITY

IMPACT OF EVERY ADDITIONAL 10 FEET REQUIRED

20’ ACCESS



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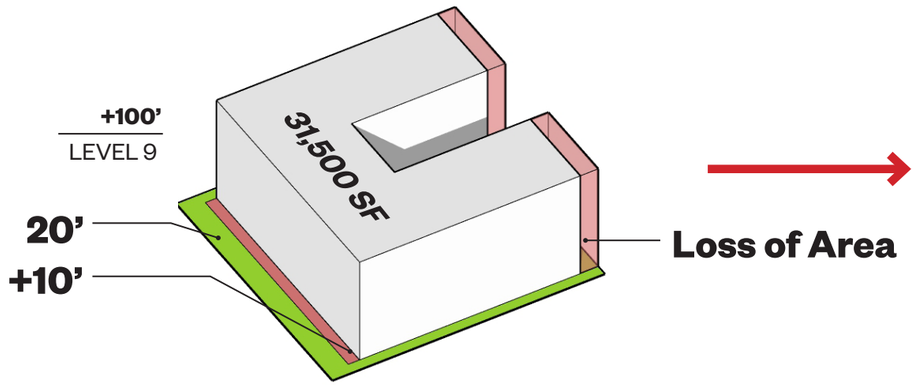

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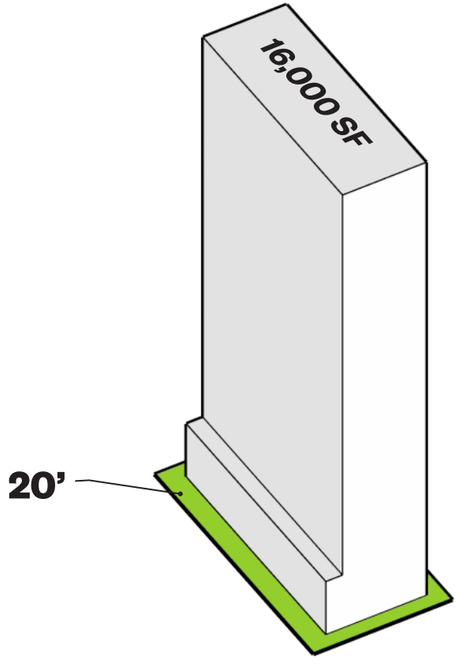

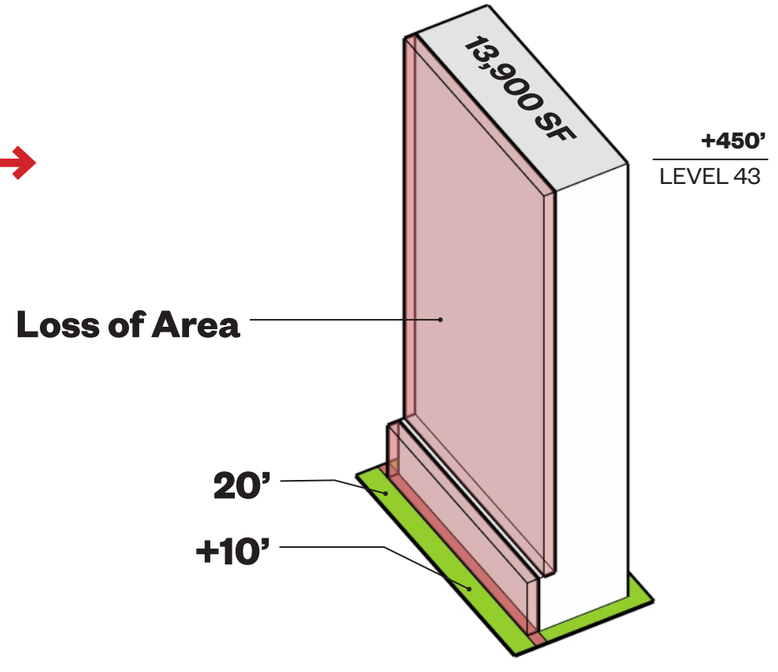

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CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
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1661 & 11671 SE 1ST STREET, BELLEVUE - SHOWN WITH LUCA-REQUIRED 51' FLEXIBLE ACCESS CORRIDOR

CLIENT NAME: **KGIP**
PROJECT NAME: **WILBURTON**
BELLEVUE, WA

51' WIDTH FLEXIBLE ACCESS CORRIDOR

11
12-11-2024
2022065

From: Jodie Alberts
To: PlanningCommission
Cc: Jessica Clawson; Joe Fain
Subject: PLUSH Comments - Wilburton LUCA
Date: Tuesday, December 10, 2024 10:50:16 AM
Attachments: PLUSH_Wilburton LUCA Comments_12.10.2024.pdf

Planning Commissioners,

Thank you for the opportunity to provide comment on the Wilburton LUCA. Please find the attached letter from the Chamber's PLUSH Committee regarding: 1) Cost saving measures as discussed at the November 6 Commission meeting; 2) Flexible provisions for nonconforming uses.

We appreciate your continued dedication to increasing both housing supply in Bellevue and vibrancy in the Wilburton subarea.

Warmly,
Jodie

Jodie Alberts
Vice President of Government Affairs | **Bellevue Chamber**
M: 901.834.4261 | O: 425.213.1206 | E: jodie@bellevuechamber.org
BellevueChamber.org

Bellevue CHAMBER

PLUSH COMMITTEE
Permitting, Land Use, Sustainability, & Housing

bellevuechamber.org
425-454-2464
staff@bellevuechamber.org

December 10, 2024

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

Subject: PLUSH Comments, Wilburton LUCA

Dear Chair Goeppele and Commissioners,

Thank you to the Planning Commission and City staff for their continued efforts on the LUCA and the Wilburton Code. We appreciate the time and dedication that has gone into engaging stakeholders and refining the proposed policies.

We are writing to share our recommendations for further refinement of the code in two key areas: **reducing development cost burdens and adopting flexible provisions for nonconforming uses.** We believe these changes will help achieve the city's housing and economic goals while maintaining a balanced approach to Wilburton's development. Notably, several of these refinements were agreed upon during the November 6 Planning Commission meeting.

Adjustments to Support Housing Goals & Development Feasibility
At the November 6 meeting, the Planning Commission highlighted the importance of reducing the costs of development in Wilburton and directed staff to explore specific adjustments, including modifications to transportation access corridor widths. These corridors, which currently serve more as open space and buffers between buildings than for transportation purposes, represent an opportunity for cost reductions. While we recognize the complexity of balancing competing priorities, we encourage the Commission to revisit these recommendations to ensure meaningful progress on reducing development costs.

Stakeholders who have studied the impacts of the code on housing development have identified specific opportunities to achieve cost savings while maintaining the city's goals for open space and connectivity. These adjustments could unlock significant housing potential in the Wilburton subarea, contributing to Bellevue's broader housing objectives.

Specifically, we recommend the following adjustments:

- Reduce sidewalk widths from 10 feet to 6 feet, except on arterial streets such as 116th.
- Reduce the flexible access corridor width from 51 feet to 37 feet.
- Allow for a fire lane or access lane to be utilized as a pedestrian corridor, reducing the required width from 30 feet to 20 feet.

- Reduce pedestrian corridors from 14 feet to 10 feet.

These relatively small changes would have a meaningful impact on reducing development costs and would increase opportunities for housing production in Wilburton, ultimately contributing to the city's housing goals. We strongly urge the Commission to consider these recommendations as you finalize the code.

Recommendation for Flexible Nonconforming Use Provisions
Auto dealerships in Wilburton play a vital role in Bellevue's economy, generating significant tax revenue that supports city services. As the Planning Commission considers policies for nonconforming uses, it is essential to adopt provisions that allow these businesses, among others, to adapt without jeopardizing their operations or contributions to the city's fiscal health.

We recommend extending the flexible nonconforming use provisions from the Bel-Red Code to Wilburton. This approach has proven successful in allowing existing businesses to comply with evolving regulations while facilitating balanced neighborhood development. These policies are also consistent with the Wilburton subarea plan as well as Comprehensive Plan goals related to economic development and support for existing businesses.

Specifically, the Bel-Red provisions provide:

- Predictability for existing businesses to continue operating under new regulations.
- A balanced approach to phased compliance that supports long-term neighborhood goals.

By applying these provisions in Wilburton, the city can ensure that businesses like auto dealerships remain viable contributors to the economy while enabling the neighborhood's transformation.

Thank you for considering these recommendations as you finalize the Wilburton LUCA. We are confident that these adjustments will enhance the neighborhood's potential to meet Bellevue's housing and economic goals while maintaining a balanced, thoughtful approach to development.

We appreciate your time and look forward to continuing our collaboration on this important work.

Sincerely,

Jodie Alberts
Vice President, Government Affairs

Jessica Clawson
PLUSH Committee Chair

From:	eric@hansencre.com
To:	PlanningCommission; Carlson, Diane (she/her); Malakoutian, Mo; Robinson, Lynne; Canedo, Jesse; Horner, Rebecca D
Cc:	jim@obrienautogroup.com; Jessica Clawson; Chantal Razore; Jaci Rutherford
Subject:	Lexus of Bellevue - Wilburton LUCA - non-conforming provisions auto dealerships
Date:	Tuesday, December 10, 2024 11:14:39 AM
Attachments:	Lexus of Bellevue 12.10.24.pdf
Importance:	High

Hi,

Please see the attached letter on behalf of Lexus of Bellevue regarding non-conforming provisions related to auto dealerships, Wilburton LUCA.

Please confirm receipt.

Thank you,

Eric

Eric Hansen

Hansen Real Estate, LLC
Commercial Real Estate Solutions

5712 E. Lk Sammamish Pkwy SE, #100
Issaquah, WA 98029
t: 206 604 7941
f: 206 284 2733

Michael O'Brien
President
Lexus of Bellevue
101 116th Avenue SE
Bellevue, WA 98004
Via email: planningcommission@bellevuewa.gov

Subject: Nonconforming provisions related to auto dealerships—Wilburton LUCA

Dear Commissioners:

We write to share our concerns regarding the proposed updates to the Wilburton Code as it pertains to auto dealerships in Bellevue. Lexus of Bellevue has a long history of collaboration with the City of Bellevue, purchasing the old City Hall from Bellevue to construct the dealership that exists on 116th today. We recognize the tremendous opportunities the Wilburton area presents for future growth and development. However, we urge the Commission to consider the significant role that auto dealerships like Lexus of Bellevue play in the city's economy, and to adjust the code to avoid unintended consequences for these businesses. Specifically, we would like the Planning Commission to consider the following as it relates to existing auto dealerships in Wilburton today:

- **Direct staff to apply the Bel-Red nonconforming provisions rather than the citywide provisions. These provisions give more certainty and flexibility for existing businesses as they continue to operate in Wilburton. The Bel-Red standards balance the urban design standards with existing businesses better than do the citywide standards.**
- **The Bel-Red nonconforming code is consistent with the Wilburton subarea plan, and Comprehensive Plan Policies, that direct the City to "accommodate the continued operation of existing service and commercial uses" and "support economic development in the City's commercial centers." The policies also direct the City to "recognize and consider the economic…impacts of proposed legislative actions prior to adoption."**
- **Auto dealerships are a significant source of tax revenue to the City of Bellevue. "Nonconforming" a business out of Wilburton by requiring physical changes that are not consistent with national dealership design standards will have far-reaching impacts to the City's budget.**

The following is more detailed information related to each of the points below.

1. Importance of Auto Dealerships to Bellevue's Tax Revenue

Auto dealerships, including Lexus of Bellevue, are vital contributors to the city's economy. Lexus of Bellevue is not only a successful local business but Bellevue is also the number one service area for Lexus in Washington state. A major portion of Bellevue's annual tax revenues are generated by auto dealerships. The Wilburton Code, as currently proposed, creates significant nonconformities for auto dealerships in the area, which could jeopardize their ability to continue operating successfully and contributing to Bellevue's tax base.

2. Challenges with Nonconformities Under the Proposed Code

The proposed Wilburton Code would apply "citywide" nonconforming provisions to the Lexus of Bellevue dealership. This would create considerable challenges, particularly in applying standards that are required by national dealerships that conflict with several portions of the Wilburton LUCA. The likely upgrades to the dealership to meet national standards that will occur will also need to become more conforming to the code, which means the dealership may not be able to meet national standards. This is devastating for dealerships and could lead to dealerships leaving Bellevue.

In addition to the display and service requirements, the code also mandates transportation corridors, significant sidewalk and landscaping improvements, and open space requirements. While these provisions are certainly important for the long-term vision of the neighborhood, they may not be suitable for the operational needs of auto dealerships, which require large service areas and auto display spaces that would not be allowed under the Wilburton Code.

3. Recognize the Need to Protect Auto Dealerships

It is evident that the city is focused on increasing density and redevelopment in the Wilburton area. However, it is critical to acknowledge that auto dealerships are a key component of Bellevue's budget. The current proposal does not sufficiently account for the fact that, while many dealerships operating on leased land may eventually be redeveloped, others like Lexus of Bellevue are essential for maintaining the city's tax revenue. If the dealerships are pushed out of Wilburton, there is no other place in Bellevue for them to relocate. Bellevue then stands to lose a significant source of revenue.

4. Recommendation to Apply the Bel-Red Nonconforming Standards

We strongly urge the Planning Commission to consider applying the Bel-Red nonconforming standards to auto dealerships in the Wilburton area. These provisions struck a balance between enabling redevelopment and allowing businesses that were integral to the area to remain viable. Applying similar standards to the Wilburton Code would provide much-needed predictability for auto dealerships, allowing them to continue to operate and contribute to Bellevue's economy while still supporting the city's long-term growth and development goals.

The Bel-Red nonconforming standards require some proportional compliance with updated zoning regulations but do so in a way that allows businesses to remain functional and compliant over time. This approach would ensure that Bellevue continues to benefit from the tax revenue generated by dealerships, while also allowing for gradual and predictable redevelopment.

5. The Bel-Red Conforming Provisions are Consistent with the Wilburton Vision and the Overall Comprehensive Plan

The Wilburton Subarea Plan and Comprehensive Plan include policies that directly support the inclusion of more balanced nonconforming provisions, like the Bel-Red provisions, including:

POLICY S-WI-38. Accommodate the continued operation of existing service and commercial uses and allow new service and commercial businesses that are compatible with planned land uses.

LU-24. Allow existing uses to continue in areas with a change in future land use until the parcel is redeveloped.

LU-33. Help communities to maintain a distinctive local character while recognizing that neighborhoods evolve over time to meet community needs.

ED-1. Maintain a business climate that supports the retention and expansion of the city's economic base.

ED-2. Promote local businesses and locally-produced goods and services.

ED-9. Recognize and consider the economic and environmental impacts of proposed legislative actions prior to adoption

ED-23. Support economic development in the city's commercial areas

ED-25. Emphasize the value of a range of commercial centers to provide opportunities for a diverse range of businesses

Lexus of Bellevue is supportive of the vision for the Wilburton area's growth and redevelopment, and it is essential that the Planning Commission recognize the important role that auto dealerships play in the city's economy. We respectfully request that the Commission direct staff to apply the Bel-Red nonconforming standards to auto dealerships in the Wilburton area. This solution would allow for continued business operations, necessary upgrades to dealership facilities, and the preservation of important tax revenue while also ensuring that the city's long-term planning goals are met.

Thank you for considering my comments. I look forward to seeing a thoughtful and balanced approach that supports Bellevue's growth, businesses, and community.

Sincerely,

Eric Hansen
Hansen Real Estate, LLC, Owner's Representative for:
Lexus of Bellevue/Michael P. O'Brien

CC: City Manager Diane Carlson
Mayor Lynne Robinson
Deputy Mayor Mo Malakoutian
Economic Development Director Jesse Canedo
Development Services Director Rebecca Horner

From:	phyllisjwhite@comcast.net
To:	PlanningCommission
Subject:	Request to Evaluate WDFW"s Recommendations for Neighborhood Critical Areas within the Wilburton/NE 8th Subarea
Date:	Wednesday, December 11, 2024 9:08:17 AM
Attachments:	Public Comments 12-11-24.docx Bellevue Wilburton Plan Comments - WDFW.pdf

Please add this to the record.
Dear Chair Goepple, Vice-Chair Cuellar-Calad, Planning Commissioners Ferris, Bhargava, Villaveces, Lu, Khanloo, and Deputy Mayor Malakoutian,
Attached are two letters: one from the Washington State Department of Fish and Wildlife (WDFW) and another from me.
Upon review of our neighborhood critical areas, the WDFW has provided thoughtful recommendations for the Wilburton/NE 8th Subareas, emphasizing the importance of riparian wildlife corridors. I am writing to urge the Commission to review the WDFW's critical area recommendations--encompassing 134th, 132nd, and 130th Avenues NE, between NE 8th Street and Bel-Red Road.
This area is a vital part of the Kelsey Creek Watershed, supporting landmark tree canopies that provide essential ecosystem services. These features not only contribute to the ecological health of the watershed but also enhances the character and environmental quality of our community. Recognizing these neighborhoods as a critical area would help ensure that its ecological integrity is preserved for the benefit of current and future generations.
In addition, I request that all of the critical areas in our neighborhood be considered in all future permitting processes to safeguard these natural resources from unnecessary harm and degradation.
This area is a vital part of the Kelsey Creek Watershed, supporting landmark tree canopies that provide essential ecosystem services.
Thank you for your consideration to this important matter.
Sincerely,
Phyllis White,
Wilburton/NE 8th Subarea Resident

Preserving the Kelsey Creek Watershed, It's Wildlife Corridor, and Tree Canopies in the Wilburton/NE 8th Street Subarea

Dear Chair Goepple, Vice-Chair Cuellar-Calad, Planning Commissioners Ferris, Bhargava, Villaveces, Lu, Khanloo, and Deputy Mayor Malakoutian,

I am writing to express my deep concern regarding the preservation and protection of the **Kelsey Creek Watershed** and the vital tree canopies in our neighborhood, specifically around **134th, 132nd, and 130th Ave NE between NE 8th Street and Bel-Red Road**. The Kelsey Creek Watershed and its surrounding areas are considered one of the few remaining natural havens in a city such as Bellevue.

Attached is a letter from the Washington State Department of Fish and Wildlife (WDFW).

Significant Loss of Tree Canopy in Wilburton:

City data indicates that the **Wilburton area has experienced the greatest loss of tree canopy** compared to other neighborhoods in Bellevue. This alarming trend poses a serious threat to the ecological integrity of our community and highlights the urgent need for enhanced protections:

Neighborhood Areas Minus Bellevue Parks	2011 % UTC	2019 % UTC	Change from 2011 to 2019
BelRed	14.3%	13.7%	-0.6%
Bridle Trails	47.6%	51.7%	4.1%
Cougar Mountain / Lakemont	39.3%	42.7%	3.4%
Crossroads	26.8%	30.4%	3.5%
Downtown	6.4%	7.7%	1.3%
Eastgate	33.6%	37.4%	3.8%
Factoria	18.1%	20.1%	2.0%
Lake Hills	28.6%	32.5%	3.9%
Newport	36.0%	35.7%	-0.3%
Northeast Bellevue	27.6%	31.7%	4.1%
Northwest Bellevue	33.0%	34.2%	1.2%
Somerset	32.2%	34.2%	2.0%
West Bellevue	37.4%	37.8%	0.4%
West Lake Sammamish	38.6%	43.0%	4.5%
Wilburton	30.2%	29.3%	-0.9%
Woodridge	33.9%	34.8%	0.8%
Totals	**32.9%**	**35.3%**	**2.4%**

Table 9. | Urban tree canopy change by neighborhoods minus park lands.

The **Kelsey Creek Watershed Assessment Report** (2021) notes that among Bellevue's four major watersheds (Coal/Newport, Lake Sammamish, Lake Washington, and Greater Kelsey Creek), the **Greater Kelsey Creek Watershed and its sub-watersheds have the lowest percentage of riparian canopy cover and the highest percentage of riparian impervious surface cover** (Kelsey Creek Assessment Report, 2021, page 2-67). This underscores the vulnerability of our watershed to further development pressures.

Ownership and Importance of the Riparian Corridor:

Ownership of the riparian corridor across all sub-basins is approximately **90% private property** and only **10% publicly owned**, mostly within parks. In our sub-basin of Kelsey Creek—the **Kelsey Creek Corridor—14.5%** is parkland, while the remaining **85.5%** is privately owned. This means that the stewardship of this critical ecosystem relies heavily on collaboration between private landowners and the city.

Alignment with the Wilburton/NE 8th Street Subarea Plan:

Upon reviewing the **Wilburton/NE 8th Street Subarea Plan** (Wilburton/NE 8th Street Subarea Plan), there is an opportunity to strengthen the plan:

- **Integrate the Recommendations from the Washington Department of Fish and Wildlife (WDFW):** The WDFW has provided detailed recommendations to enhance environmental protections in the area, focusing on riparian management and habitat conservation in our neighborhood:
    - "Incorporating our recommendations helps align this plan with BAS standards (WAC 365-195 900) and further demonstrates Bellevue's leadership in sustainable urban development. Our recommendations further align with the policies within the Wilburton/N.E. 8th Street Plan, such as "S-WI-9. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin," and "S-WI-10. Prevent development from intruding into the floodplain of Kelsey Creek."
- **Enhance Policies for Environmental Stewardship:** Include clear policies that commit to protecting the Kelsey Creek Watershed, its riparian corridors, and the associated tree canopies.
- **Strengthen Land Use Regulations:** Amend zoning and land use regulations within the Subarea Plan to limit further loss of natural habitats and mitigate the impacts of increased housing density on critical areas.

Recommendations from the Washington Department of Fish and Wildlife (WDFW):

In alignment with recommendations provided by the WDFW regarding the Bellevue Wilburton Plan, I urge Council to oversee the city to:

1. **Adopt Best Available Science (BAS) for Riparian Management:**
    - Utilize **Site Potential Tree Height (SPTH) at 200 years** to determine appropriate riparian buffer widths.
    - Implement **Riparian Management Zones (RMZs)** instead of traditional stream typing.
    - Establish riparian buffers of **187–196 feet** as recommended, ensuring adequate protection for aquatic and terrestrial species.
2. **Strengthen Tree Canopy Protections in the floodplain of Kelsey Creek:**

- Recognize that current tree canopy codes are insufficient, especially as Wilburton has experienced significant canopy loss.
- Enhance tree canopy coverage targets, particularly within riparian zones, to support King County's **Extreme Heat Mitigation Strategy** and combat the urban heat island effect.
- Implement a **3:1 significant and landmark tree replacement ratio** regardless of tree species within riparian areas, meeting with the city's overall **40% tree retention goal**, acknowledging that riparian zones require greater protections.

3. **Incorporate Recommendations into the Wilburton/NE 8th Street Subarea Plan:**
    - Amend the Subarea Plan to accommodate these environmental recommendations, ensuring that future development is balanced with ecological preservation.

Compliance with State Legislation and Regional Strategies:

- **Growth Management Act (GMA):** Mandates the protection of critical areas and conservation of natural resources.
- **Shoreline Management Act (SMA)** and **State Environmental Policy Act (SEPA):** Require thorough environmental impact assessments for development projects.
- **Priority Habitats and Species (PHS) Program:** Requires the use of best available science to protect priority habitats and species.
- **King County's Extreme Heat Mitigation Strategy:** Emphasizes increasing tree canopy cover to combat urban heat islands, aligning with the need to protect and expand canopy in critical areas.

The Kelsey Creek Watershed and the Wilburton area are at a critical juncture. The significant loss of tree canopy and the poor condition of riparian areas necessitate immediate action.

By integrating these recommendations into the **Wilburton/NE 8th Street Subarea Plan** and the city's broader planning efforts, we can protect our wildlife corridors, support biodiversity, and ensure that Bellevue remains a city that values and safeguards its natural environment.

Thank you for your attention to this critical matter. I welcome the opportunity to discuss these concerns further and contribute to developing sustainable solutions.

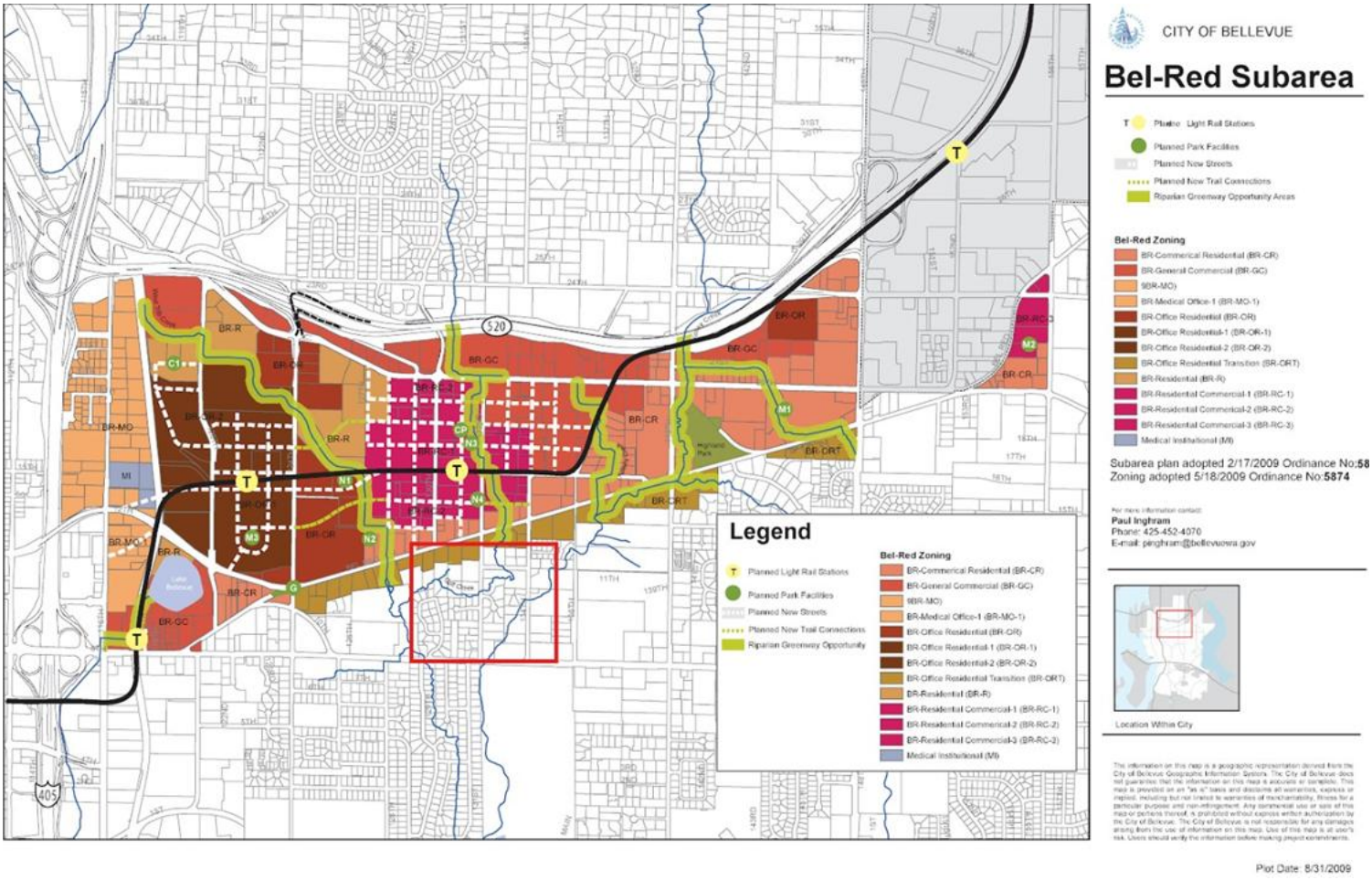
Sincerely,

Phyllis White

Wilburton/NE 8th Subarea Resident

Resources:

1. The Wilburton/NE 8th Subarea includes our neighborhood and its critical areas:



2. **Ecological Significance and Wildlife Species:**

The Wilburton/NE 8th Street Subarea Plan which includes the floodplains of the **Kelsey Creek Watershed** is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services. The proposed increase in housing density developments on private properties, has the potential to significantly impact the delicate balance of the ecosystem, including water quality, habitat fragmentation, and increased runoff, which could be detrimental to the preservation of aquatic, plant, and land animal species.

Aquatic Species:

Historically, the Greater Kelsey Creek Watershed has provided extensive spawning and rearing habitat for a large number of anadromous and migratory salmonids and other fish species, including:

- **Chinook Salmon** (*Oncorhynchus tshawytscha*) — Listed as **Threatened** under the Endangered Species Act.
- **Sockeye Salmon** (*Oncorhynchus nerka*).
- **Coho Salmon** (*Oncorhynchus kisutch*).

- **Cutthroat Trout** (*Oncorhynchus clarkii*).
- **Steelhead Trout** (*Oncorhynchus mykiss*) — Also listed as **Threatened**.
- **Peamouth Minnows** (*Mylocheilus caurinus*) — Which return to Kelsey Creek from Lake Washington to spawn each spring.

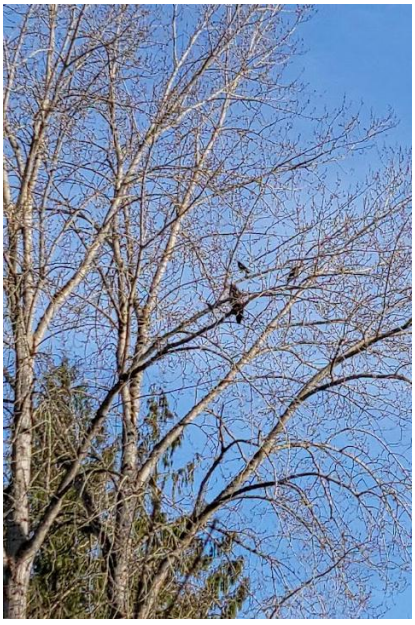
While several of these species can still be observed throughout the watershed today, spawning and rearing habitats have diminished due to urbanization.

Terrestrial Species:

The riparian corridors and surrounding habitats are home to various land species that rely on this area for survival, including:

- **Bald Eagles** (*Haliaeetus leucocephalus*) — Protected under the Bald and Golden Eagle Protection Act.
- **Great Blue Herons** (*Ardea herodias*) — A priority species needing conservation.
- **Red-tailed Hawks** (*Buteo jamaicensis*).
- **Bats** — Including species of conservation concern due to declining populations.
- **Pileated Woodpeckers** (*Dryocopus pileatus*).
- **Western Pond Turtles** (*Actinemys marmorata*) — Considered a species of concern.

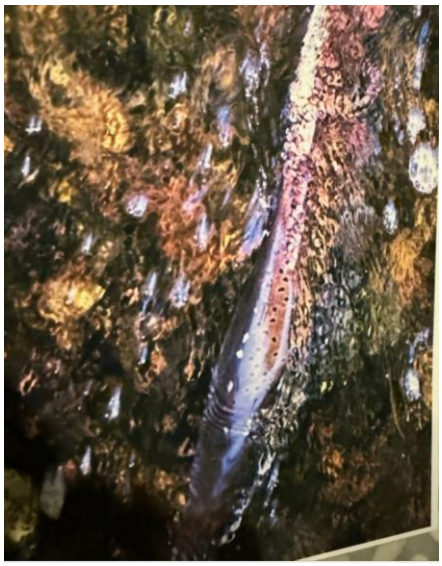

A Bald Eagle flying over a neighbor's roof.


A hawk in our neighbor's tree.

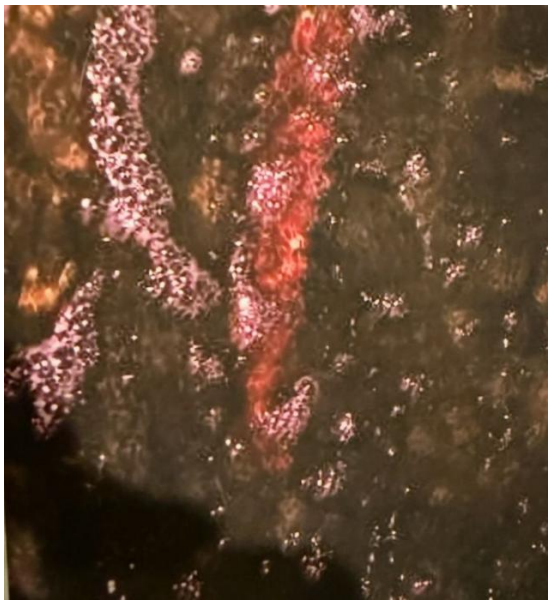
A Red-Tailed Hawk on a neighbor’s roof.

A bobcat on a neighbor’s fence.

Fish in the streams in our neighbor’s yard. Carcasses of fish are also found eaten by animals.



Fish in our neighbor’s stream.



More fish in our neighbor’s yard.

3. The City of Bellevue has indeed been involved in efforts to restore the salmon habitat in Kelsey Creek, particularly around NE 8th and 132nd. The projects have included strategies such as protecting and restoring riparian vegetation, improving fish passage, and enhancing creek mouths[1]. Additionally, there have been initiatives to restore stream channels and create off-channel habitats upstream of NE 8th[1]. These efforts are crucial for maintaining the ecological balance and supporting the salmon population in urban stream environments.

Construction on NE 8th to replace Kelsey Creek culvert | City of Bellevue (bellevuewa.gov)

State of Washington
Department of Fish and Wildlife, Region 4
Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

October 31, 2024

City of Bellevue
Josh Steiner
450 110th Ave NE
Bellevue, WA 98004

WDFW Comments Regarding the Wilburton Vision Implementation Land Use Code Amendments

Dear Mr. Steiner,

On behalf of the Washington Department of Fish and Wildlife (WDFW), thank you for the opportunity to comment on the city of Bellevue's Wilburton Vision Implementation Land Use Code Amendment. Within the State of Washington's land use decision-making framework, WDFW is considered a technical advisor for the habitat needs of fish and wildlife and routinely provides input into the implications of land use decisions. We provide these comments and recommendations in keeping with our legislative mandate to preserve, protect, and perpetuate fish and wildlife and their habitats for the benefit of future generations – a mission we can only accomplish in partnership with local jurisdictions.

Fish and Wildlife Resources and Recommendations:

Congratulations on the recent land use code updates proposed to successfully implement the Wilburton Subarea Plan. Integrating green building incentives, open space provisions, and other sustainable development measures reflects Bellevue's commitment to fostering a vibrant and environmentally conscious community.

To further strengthen these efforts, we recommend incorporating WDFW's Best Available Science (BAS) for riparian management zones (RMZs), including the Site Potential Tree Height at 200 years ($SPTH_{200}$) standard. Think of $SPTH_{200}$ like a measuring cup for riparian ecosystems— it provides the exact "recipe" for buffer width determination, ensuring adequate filtration, erosion control, and shade requirements are met to protect water quality and aquatic habitats, especially for sensitive species like Chinook salmon in Kelsey Creek.

Our data shows that a 196 ft RMZ (or 'buffer' width) is needed in the Kelsey Creek area to protect all critical ecosystem functions and values. According to our BAS management recommendations, a minimum of 100 feet is required to filter most pollutants, whereas buffers under 100 feet, such as the current 50-foot width, are insufficient for safeguarding water quality and ecosystem integrity. Utilizing WDFW's BAS can help Bellevue align with its interlocal agreement commitments and provide lasting environmental benefits.

WDFW's BAS also underscores the importance of protecting all streams, not just those with fish presence, and prioritizing the retention of mature vegetation over compensatory mitigation planting. In addition to supporting fish life, healthy riparian vegetation stabilizes stream banks, prevents erosion, and provides the necessary shade to maintain cool water temperatures. These ecosystem functions are challenging to replace, particularly those provided by mature plants. With climate change increasing the likelihood of severe heat and storm events, protecting vegetated buffers will help absorb floodwaters, mitigate future high-flow conditions, and maintain cooler water temperatures, ultimately contributing to community resilience.

While a broader code update is anticipated in 2025, establishing protections now ahead of increased development activity will help ensure that the Wilburton area's streams continue to provide essential ecosystem services while allowing development in suitable areas. Riparian areas can also serve as open spaces that enhance community character, offering recreational areas and natural spaces for residents to enjoy. By preserving adequate RMZs delineated using the $SPTH_{200}$ standard, Bellevue can foster a more resilient, livable, and ecologically connected Wilburton area.

Incorporating our recommendations helps align this plan with BAS standards (WAC 365-195-900) and further demonstrates Bellevue's leadership in sustainable urban development. Our recommendations further align with the policies within the Wilburton/N.E. 8th Street Plan, such as "S-WI-9. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin," and "S-WI-10. Prevent development from intruding into the floodplain of Kelsey Creek."

We would be happy to assist in providing additional information on WDFW's recommendations or explore opportunities to integrate these environmental and community benefits into future planning. Please also see the WA Department of Ecology's funding opportunity, the Climate Resilient Riparian Systems Grant. See also NOAA's grant opportunity, Restoring Fish Passage through Barrier Removal Grants.

Thank you once again for your dedication to enriching Bellevue's natural and built environments. Please feel free to reach out to our Reginal Land Use Lead for further collaboration (Morgan Krueger, Morgan.Krueger@dfw.wa.gov).

Sincerely,

Timothy Stapleton

Washington Department of Fish and Wildlife
Region 4, Habitat Program Manager

CC:
Morgan Krueger, Regional Land Use Lead (Morgan.Krueger@dfw.wa.gov)
Kara Whittaker, Land Use Conservation and Policy Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Land Use Conservation and Policy Planner (Marian.Berejikian@dfw.wa.gov)
Stewart Reinbold, Assistant Regional Habitat Program Manager (Stewart.Reinbold@dfw.wa.gov)
Bethany Scoggins, Habitat Biologist (Bethany.Scoggins@dfw.wa.gov)
Jesse Dykstra, Habitat Biologist (Jesse.Dykstra@dfw.wa.gov)

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Dear Members of the Bellevue Planning Commission,

Thank you for your hard work and dedication in shaping the Land Use Code Amendment (LUCA) and Wilburton Code. The time and effort invested by the Commission and City staff in integrating stakeholder input and refining the proposed policies are truly commendable. However, upon reviewing the latest draft, there remain several critical adjustments needed to optimize site organization, reduce development costs, and ensure the long-term success of the Wilburton subarea.

The Commission's focus on cost-effective development, as highlighted in the November 6 meeting, is crucial. Yet, the most recent draft still omits several key changes necessary to address these concerns—particularly with respect to transportation access corridors. Achieving the city's objectives of housing production and vibrant community development requires greater flexibility within the code. To this end, we recommend the following adjustments:

1. **Adjust Sidewalk Widths:** Reduce sidewalk widths to 6 feet, except along 116th Avenue or other arterial streets where additional width may be necessary.
2. **Modify Flexible Access Corridors:** Decrease the required width of flexible access corridors from 51 feet to 37 feet.
3. **Optimize Pedestrian Corridors:** Permit fire or access lanes to also serve as pedestrian corridors, reducing the width requirement from 30 feet to 20 feet.
4. **Reduce Pedestrian Corridor Widths:** Decrease the pedestrian corridor width from 14 feet to 10 feet.

Implementing these changes could significantly enhance the potential for housing production within Wilburton by addressing spatial and financial constraints faced by developers. While standards are vital for ensuring consistency and quality in urban development, it's equally important to provide adaptability to meet the diverse needs of projects within the subarea. For example, the current 51-foot flexible access corridor mandate may not be feasible for all developments, particularly those on smaller or constrained parcels. Similarly, requiring a uniform 10-foot sidewalk for all access corridors imposes unnecessary challenges without proportionate benefits.

We appreciate the Commission's commitment to balancing flexibility with development goals and ensuring high standards for urban design, infrastructure, and public safety. By revising these overly rigid requirements, Bellevue can foster a more affordable and inclusive development environment while maintaining the vision of a thriving and dynamic Wilburton subarea.

Thank you for your attention to these important considerations and for your ongoing efforts to support thoughtful and impactful urban development. We look forward to seeing how these recommendations can help shape a more practical and effective LUCA for Wilburton.

Sincerely,
Saghar Amini
Advocacy & Policy Manager

Nesse, Katherine

From: leesgt@aol.com
Sent: Sunday, December 15, 2024 4:30 PM
To: PlanningCommission
Subject: Bellevue Planning Commission 12/11/2024

Follow Up Flag: Follow up
Flag Status: Flagged

I have to admit that I had the same mental responses that I had for a similar meeting that occurred at a recent Bellevue Council meeting where Oral Communications was dominated by developers/owners regarding the Wilburton Vision Land Use Code Amendment gave a well-orchestrated combined presentation using 6 of the 10 presentation opportunities. It was limited to 6 because the City Council rules limited it to 3 pro and 3 con presentations. Each presentation gave essentially the same material but prefixed it with “pro” or “con” to fit the maximum time frame provided. In this case it shut out all other sources of presentation by the community at large. It was a snow job in my mind.

I guess the way I see it was that they used a repeated issue of less Affordable Housing available if it did not allow for 10 additional feet and reducing the street size appropriately. I thought it strange the 10 linear feet per floor would allow such a marvelous abundance of affordable housing. I guess if the apartments were wide 10 feet deep there might be 8 feet deep on the inside, I don’t know how wide they would be but a little narrower than most units I have been in. While stating that there would be more of the affordable housing available there was no specific number or percentage of the building indicated. I am guessing that the abundant documentation provided gave better details than I saw or heard. The presentations were certainly demanding enough in the oral vein.

It seems to me that shrinking the street size in an area that is to contain many times the number of people destroys the ability to later make changes to accommodate transportation changes-meet flexible needs of constant flow of goods delivery/furniture delivery/bicycle lane growth-parking and travel/etc. delivery/future unknown needs. It does, of course, make sense for the near future where the more usable commercial sales/rental space can be capitalized-sidewalks are just an expense.

I also believe that I have heard these arguments raised before. I bet the staff has heard them as well. I think that the staff has considered it more accurately than an oral/published documents presentation by stakeholders did. (I think I would listen to the staff before going any further as they have been through the trial by fire for longer.)

As always, you can take my ramblings as being based on ignorance and in twenty years or so we will see if there is any justification. Probably more like 5 or 10 years. (When I was in Europe a few weeks ago, in Amsterdam and several other cities-I saw what happened and they get by there. Lots of places that vehicles, pedestrians and bicycles exist. Lots of bicycles parked and piled on top, chained to other bikes and they seem to get along. Vegetation was very limited in the cities. Sometimes the “roads” were little more than sidewalk

size and people, bikes, and vehicles used them at the same time, imagine what the stakeholders could do with that scenario.)

Lee Sargent

16246 NE 24th ST

Bellevue, WA 98008

Home: 425-641-7568

Mobile: 206-8616140

Nesse, Katherine

From: Kian <kiandbradley@gmail.com>
Sent: Tuesday, December 17, 2024 5:24 PM
To: PlanningCommission
Cc: Council
Subject: Reduce parking minimums in Wilburton

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Bellevue Planning Commission,

As I understand, the city staff is going to be recommending a 75% reduction for parking minimums in Wilburton. I think this is a great idea! The area is well served by public transit, especially with the coming light rail connection to Seattle and the expanding EastRail corridor for people walking and cycling.

As you may know, Bellevue has an extraordinary amount of parking for its current buildings. If you drive downtown, you'll find most buildings have 3-6 levels of underground parking. The 4-story above ground parking structure west of the mall represents an enormous overdevelopment, land that could easily go to more housing or park space.

Not only is Bellevue parking underutilized, this comes at a very significant cost. Developers spend millions of dollars to build underground parking as required by regulation, costs which are then passed on in the form of rent. This also encourages users to drive for every single occasion- my friend used to drive from his Avalon Towers residence to the Safeway, 0.6 miles away, because parking was always free and easy and the road was loud and unpleasant to cross.

Let's not make the same mistake for Wilburton. This represents an opportunity to rethink development in Belleuve. If we drop parking minimums by 75%, or even entirely, developers can more easily construct European-style walking districts where residents can avoid the cost of car ownership and enjoy pleasant, quiet areas.

Bellingham and Shoreline are both in the process of dropping parking minimums, joining cities like Houston, Minneapolis and Sacramento. Let's do the same for Wilburton.

Thanks!
Kian Bradley

Nesse, Katherine

From: Kyle Sullivan <kyle@sosufamily.net>
Sent: Wednesday, December 18, 2024 1:13 PM
To: PlanningCommission
Subject: Please Eliminate Parking Requirements in Wilburton

Follow Up Flag: Follow up
Flag Status: Flagged

Commissioners,

I know that you have been discussing reduced parking requirements for the Wilburton area. I want to encourage you to fully eliminate parking requirements in this area. This will allow the most flexibility in how Wilburton is developed, and makes it more likely to achieve the vision of a walkable, sustainable neighborhood.

The number one thing that prevents me from wanting to walk around existing neighborhoods in Bellevue is how spread out everything is. Each parking lot means that I have farther to walk to get to the next point of interest. Parking incentivizes driving, and when driving is a priority, the roads are wider. Wide roads are unpleasant to walk next to, and again makes walking distances longer (and crossings less safe).

Even if parking is underground rather than on the surface, this is a huge tradeoff. Parking structures are massively expensive, so that cost has to be recovered in the rent charged to residents and businesses, and in the price of goods and services.

Removing parking does not mean that there will be no parking in Wilburton, but it gives flexibility in development. Developers are naturally incentivized to reduce construction costs, so they will consider how much parking they will need, and only build that much.
Buildings that want to appeal to light rail travelers might decide they need little to no parking, while others may decide their target audience is more likely to drive. Maybe two adjacent buildings can share a parking garage to save costs, and simplify car access. Fewer driveways would make the area more walkable and safe. Bellevue has targets for reduction in Vehicle Miles Traveled and CO2 emissions, and building less parking will promote other types of transportation.

Spokane, Shoreline, Bellingham and Port Townsend are all in the process of totally removing parking requirements citywide. I think Bellevue should match their forward-thinking approach and removing parking requirements for Wilburton. For the environment, for walkability, for affordability. Thank you.

Kyle Sullivan