

CITY OF BELLEVUE
BELLEVUE PLANNING COMMISSION
MINUTES

May 27, 2026
6:30 p.m.

Bellevue City Hall
Room 1E-113

COMMISSIONERS PRESENT: Chair Khanloo, Vice Chair Lu, Commissioners Ferris, Goepple, Kennedy, Villaveces, Nilchian

COMMISSIONERS REMOTE: None

COMMISSIONERS ABSENT: None

STAFF PRESENT: Kate Nesse, Thara Johnson, Dave Lee, Scott McDonald, Community Development Department; Nick Whipple, Mathieu Menard, Kristina Gallant, Development Services Department; Matt McFarland, City Attorney's Office, Joseph Todd, City Manager's Office

COUNCIL LIAISON: Councilmember Bhargava

GUEST SPEAKERS: None

RECORDING SECRETARY: Gerry Lindsay

1. CALL TO ORDER
(6:30 p.m.)

The meeting was called to order at 6:30 p.m. by Chair Khanloo who presided.

2. ROLL CALL
(6:31 p.m.)

Upon the call of the roll, all Commissioners were present.

3. APPROVAL OF AGENDA
(6:31 p.m.)

A motion to approve the agenda was made by Commissioner Ferris and seconded by Commissioner Goepple. A motion to amend the agenda to switch the order of Items 8A and 8B was made by Chair Khanloo and seconded by Commissioner Ferris. The motion carried unanimously.

4. REPORTS OF CITY COUNCIL, BOARDS AND COMMISSIONS – None
(6:32 p.m.)

5. STAFF REPORTS
(6:32 p.m.)

A. Planning Commission Meeting Schedule

Senior Planner Dr. Kate Nesse took a few minutes to review the Commission's schedule of upcoming meeting dates and agenda items.

6. WRITTEN AND ORAL COMMUNICATIONS

A. Written Communications (6:33 p.m.)

Dr. Kate Nesse noted the receipt of numerous written communications, all of which were forwarded to the Commission. Written communications that came in after the 11am cut off on the day of the meeting will be forwarded to the commission at a future date.

B. Oral Communications (6:33 p.m.)

Chair Khanloo reviewed the procedural rules, including the three-minute time limit per speaker, the total 30-minute allotment for oral communication, and the requirement under Ordinance 6752 that comments relate to matters within the Planning Commission's authority.

Nava Carlyle spoke representing the Bellevue Chamber of Commerce and the PLUSH Committee and voiced support for the city's commitment to keeping Downtown Bellevue's regulatory framework current and competitive. Significant changes have occurred since the adoption of Downtown Livability 1.0 in 2017, including growth pressures, the Grand Connection initiative, evolving housing needs, and policy updates reflected in the Bellevue 2044 Comprehensive Plan and the city's affordable housing strategy. Feasibility should remain the foundation of the code update process, and the affordable housing requirements, design standards, and amenity obligations must be grounded in market conditions rather than aspirational targets. Regulatory predictability for property owners and developers matters. Practical parking requirements, setback standards, ground-floor use requirements and the amenity incentive system must reflect what the market can realistically take. Old Bellevue and its character deserves thoughtful protections while accommodating growth. The Chamber is a partner in the process, not an obstacle. Support was expressed for policies that will enable housing development and sustain Downtown Bellevue's economic vitality.

Brady Nordstrom spoke representing the Eastside Housing Roundtable and allied the organizations in regard to the BelRed code update. Achieving the district's vision depends upon housing projects being financially feasible. Affordable housing and the arts district objectives are mutually supportive rather than competing priorities. The improvements already incorporated into the draft code were acknowledged, but it was stated that there are still barriers to development, including land consumed by proposed roadway requirements. The staff recommendations to create a more flexible amenity incentive system should be supported along with stronger incentives tied to deeper levels of housing affordability. Needed are clear compliance standards that will allow developers to confidently evaluate projects from the outset.

Diana Leo said the proposed street grid framework for BelRed along with the additional street requirements will increase redevelopment costs without addressing a demonstrated transportation need. Citing traffic analyses that indicated the existing arterial system could accommodate full buildout, it was argued that the proposed grid will function primarily as a financial burden. As an alternative, the recommendation was made to rely on block perimeter standards, pedestrian corridors, and privately owned streets with public access easements to achieve connectivity

while preserving developable land. BelRed should prioritize pedestrian-oriented, transit-focused development. A more flexible framework, similar to that used in the Wilburton area, will better support housing production. The Commissioners were encouraged to consider provisions addressing nonconforming warehouse and light industrial uses. The Commission was urged to adopt a code framework that will accelerate housing development and help BelRed become a leading transit-oriented neighborhood.

Paul O'Sullivan spoke on behalf of Albertsons and its 18.5-acre property in the Spring District. Using a series of visual exhibits, the speaker described the company's vision for redevelopment of the site as a flexible mixed-use district capable of accommodating residential, office, and other uses. The concept was contrasted with the city's proposed street grid and it was argued that the planned roadway will divide the property into smaller, less functional parcels. An alternative master plan was presented featuring a loop road, pedestrian and bicycle pathways, open space, a park, and a pond. The value of maintaining flexibility and creating a cohesive development pattern rather than fragmenting the property into multiple development sites was emphasized. Photographs and additional graphics were used to illustrate how the proposed roadway network will intersect the envisioned master plan.

Matt Roewe drew upon several years of experience as an architect studying redevelopment opportunities in Wilburton and BelRed. Support was voiced for street grids in principle, but it was argued that the realities of BelRed's ownership patterns, topography, existing development, and environmental constraints make a rigid grid difficult to implement. Many large blocks contain numerous separately owned parcels that do not align and include features such as steep slopes, streams, and existing buildings. Examples were provided of proposed street alignments that will require demolition of significant public and private facilities, including Fire Station 6 and a major T-Mobile facility. The speaker contended that constructing a traditional orthogonal grid under such conditions will be impractical and could take generations to complete. Instead, a more organic approach should be called for in which redevelopment projects provide internal streets, shared-use paths, plazas, courtyards, and other forms of connectivity tailored to site-specific conditions. The Commissioners were encouraged either to remove the mandatory street grid requirement or reduce it to a guideline, while creating incentives through the amenity system or other mechanisms to encourage connectivity improvements where they are feasible. Site-specific creativity could achieve the same objectives of connectivity, density, and neighborhood permeability while producing a more successful arts-oriented district.

John Marasco also spoke on behalf of Albertsons and the company's BelRed site. Referencing prior experience developing multifamily housing projects in the Spring District, the speaker expressed support for increased density and a broader mix of land uses in BelRed. Concerns were raised about the proposed street grid overlay and its impact on Albertsons' redevelopment plans for the property. Emphasized was the importance of ensuring that the rezone will not adversely affect the existing operation of the company's current facility. While acknowledging that the evening's discussion focused on floor area ratio and amenity incentives, the Commissioners were cautioned that additional development capacity does not automatically create value, particularly under current economic conditions where high-rise projects utilizing substantial bonus FAR may not be financially viable. Transit-oriented density is desirable for housing and employment growth, but extensive requirements for roads, pathways, and related infrastructure add significant costs to development. The Commissioners were urged to adopt an amenity bonus system that is simple, practical, and capable of supporting projects at the densities envisioned by the proposed zoning. An overly complex incentive system could discourage its use, resulting in development occurring only at base FAR levels and undermining the goals of the rezone. Concern was also expressed regarding mandatory affordable housing requirements

and their impact on project feasibility. Projects utilizing inclusionary housing provisions remain eligible for the city's Multifamily Tax Exemption program under terms similar to those approved in the Wilburton area.

Nick Bratton with King County's Department of Natural Resources and Parks addressed the Commission regarding the transfer of development rights program. The speaker reviewed the history of the city's partnership with King County, noting that a 2009 agreement enabled developers in Bellevue to obtain additional floor area by purchasing development rights from King County, resulting in the preservation of forest lands that later became parkland. The speaker also noted that King County has provided funding to Bellevue to support neighborhood amenities and described similar partnerships established with other jurisdictions. Under the arrangements, cities receive a share of proceeds from development rights sales as well as access to conservation grants that can support parks and open-space acquisitions. The city was encouraged to renew and expand its partnership with King County by incorporating transfer of development rights into the proposed amenity framework. Such an approach could generate millions of dollars for public improvements while simultaneously preserving rural lands, farms, recreational opportunities, and environmental resources that benefit residents throughout the region.

Jessie Clawson thanked the staff for their extensive work on the proposed code amendments and ongoing stakeholder engagement but urged the Commission not to advance the proposal to a public hearing before additional issues are resolved. The speaker identified the mandatory street grid as a central concern, arguing that it functions as a rigid requirement rather than as a planning option. It is neither necessary from a transportation perspective nor feasible to implement. Referring to longstanding physical constraints within BelRed, including topographical challenges and existing development patterns, it was stated that some proposed street connections will be impossible to construct and could undermine opportunities for public spaces associated with the arts district. The city itself has not pursued construction of the full grid because of its expense and the associated costs are instead being transferred to individual development projects, reducing resources available for affordable housing, arts facilities, and environmental restoration. A more flexible, site-specific approach to connectivity was recommended, including alternatives such as woonerfs and reliance on existing block-length standards. The proposed incentive structure fails to account for the cumulative costs of required improvements, including streets, stream restoration, affordable housing, and ground-floor use requirements. The obligations could suppress development altogether or limit the ability to provide the unique arts-oriented features envisioned for BelRed. As a potential solution, the proposal was made to target a catalyst-style program that will offer meaningful offsets or relief from certain requirements when projects deliver high-priority public benefits such as arts space or stream restoration. Without such adjustments, the proposed code may be unable to achieve its stated objectives.

Charlie Bauman reminded the Commission of its extensive work on the recently adopted Critical Areas Ordinance, which addresses the heavily degraded conditions of many BelRed streams. The revised critical areas regulations introduce a greater flexibility to facilitate both development and environmental restoration in recognition that restoring streams often depends on redevelopment occurring. Concerns were raised that the current LUCA draft does not fully align with the incentives established under the Critical Areas Ordinance. Specifically, certain provisions grant flexibility only for stream daylighting projects and not for restoration of already above-ground but severely degraded streams. Using Goff Creek as an example, the speaker explained that much of the creek already flows in open-air ditches and will therefore be excluded from some incentives despite requiring substantial restoration. Additional concerns were expressed regarding the financial burden of stream restoration and the limited incentives available under

the proposed amenity system. Mid-rise projects could incur millions of dollars in restoration costs while receiving little or no meaningful offset. The draft code awards bonus points only for restoration that exceeds baseline requirements, meaning any substantial restoration efforts required by code will receive no incentive. The Commission was urged to further evaluate the stream restoration incentives and to ensure that the flexibility created through the Critical Areas Ordinance is supported by meaningful development incentives within the LUCA.

A motion to extend the oral communications period by 15 minutes to allow additional speakers to be heard was made by Vice Chair Lu. The motion was seconded by Commissioner Villaveces and the motion carried unanimously.

Ben Mickle, a Downtown resident, observed that Eastrail is currently difficult to access, particularly from adjacent properties, due in part to the presence of light rail infrastructure. Although a planned access point at NE 12th Street will improve connectivity, a lengthy section of the trail will still lack western access points. Given the proposed upzoning of nearby land for mixed-use medical high-rise development, future residents, workers, and visitors will benefit from additional trail connections. The draft LUCA neither requires nor incentivizes developers to provide such access points. The omission was contrasted with the policies in the BelRed Look Forward plan that specifically call for multiple Eastrail connections and convenient active transportation access. The Commission was urged to incorporate provisions into the code that will facilitate greater trail accessibility and connectivity.

Layla Khademi, a land use attorney, characterized the proposal as a shift from a voluntary incentive framework toward a mandatory inclusionary zoning model, which will impose additional project-wide costs before developers could pursue further incentives through the amenity system. The Commission was encouraged to ensure that bonus floor area incentives are calibrated sufficiently to offset the obligations and maintain project feasibility, particularly in transit-oriented areas targeted for growth. The speaker also advocated for simplifying the amenity incentive structure by replacing district-specific point values with a single, uniform menu of amenities applicable throughout the overlay area. Such an approach will improve predictability and administrative efficiency while allowing developers to respond to site-specific conditions. Also recommended was expanding the menu of eligible amenities to encompass publicly accessible recreational facilities, fee-in-lieu contributions supporting the arts district, childcare and educational facilities, grocery stores and neighborhood-serving retail, amphitheaters and performance venues, broader environmental restoration activities, family-sized housing, and enhanced pedestrian connectivity improvements. The changes will produce a more flexible and effective incentive system aligned with both feasibility concerns and community priorities.

Felicity Hollenbeck spoke on behalf of a development team working on a nine-acre site adjacent to the BelRed light rail station and explained that Goff Creek currently runs through a pipe beneath the property. Daylighting the creek is a major project objective. While acknowledging improvements made in the most recent LUCA draft, it was argued that the economic incentives associated with daylighting remain insufficient given the extraordinary costs involved. The speaker emphasized that a uniform bonus FAR incentive does not necessarily provide value to every development site. Incentives were requested to better calibrate to actual project economics. Additional concerns were raised regarding vesting periods and project phasing. Because large, complex developments require long planning and financing horizons, the speaker advocated for a minimum ten-year vesting period to provide certainty for lenders and investors. Greater flexibility is needed in terms of phasing amenities. Major features such as creek daylighting may occur in later phases of a multi-phase project. The speaker identified what appeared to be an

outdated street alignment shown on one of the draft LUCA maps and requested that the document be revised to reflect the alignment previously agreed upon through the project's master development planning process.

Kevin Wallace with Wallace Properties addressed the Commission regarding a provision added in the second draft of the code that reduces the base floor area ratio for residential projects on the west side of 116th Avenue NE compared to properties on the east side. The disparity effectively imposes significantly greater amenity obligations on residential projects west of 116th Avenue NE than on otherwise similar projects across the street. Using an illustrative example, it was explained that a residential project on the west side could be required to provide substantially greater public benefits, such as public art, than a comparable project on the east side. The Commission was asked to restore the original draft's approach, which established a uniform base FAR on both sides of the corridor, thereby promoting parity and avoiding what was characterized as a penalty on residential development. Conditions along the western side of the corridor differ from those in Wilburton because freeway impacts are mitigated by sound walls and other factors. As a result, the additional restrictions and setbacks intended to discourage residential development are not justified and could undermine the broader city goals of increasing housing opportunities and affordability within BelRed.

Ming Zhang, an architect and owner of a property 116th Avenue NE, expressed strong support for the city's vision of creating a high-density mixed-use corridor centered on medical, life science, and residential uses, describing the concept as forward-looking and beneficial for Bellevue's future. However, concerns were raised regarding a change made between the December and April drafts of the code that reduce the base residential floor area ratio on the west side of 116th Avenue NE from four to two. The speaker acknowledged the city's desire to encourage medical and life science development but argued that reducing residential development potential will not effectively advance that objective. Residential uses are often critical to financing large mixed-use projects, supporting phased implementation, and creating the activity necessary for a successful urban district. Limiting residential development could undermine project feasibility and create an unbalanced urban form, with larger towers concentrated on the east side of 116th Avenue NE while smaller, lower-intensity development remains on the west side. The Commission was urged to restore the higher residential FAR on the west side to maintain balance, support economic feasibility, and generate additional tax revenue and development opportunities.

7. PUBLIC HEARING – None
(7:15 p.m.)

8. STUDY SESSION

B. Downtown Livability 2.0 Land Use Code Amendment
(7:15 p.m.)

Assistant Director Nick Whipple explained that the City Council recently initiated the Downtown Livability 2.0 project. Outreach activities will occur during the summer and a draft proposal will likely return to the Commission in the fall for a more detailed discussion.

Downtown Livability 1.0, a major Downtown code update adopted in 2017, represented one of the most significant revisions to the Downtown code since 1980. It was intended to make Downtown Bellevue a more livable environment rather than focusing primarily on employment growth. Key components included a redesigned amenity incentive system emphasizing open

space and improvements to the public realm; early planning for future light rail service; and substantial revisions to the building design standards. The 2017 update also introduced the possibility of 600-foot towers, two of which have since been constructed. Downtown Livability 2.0 builds upon the earlier work and responds to the substantial growth and changing conditions that have occurred since its adoption.

Senior Planner Mathieu Menard highlighted the significant growth experienced in Downtown Bellevue since 2017. The revised code facilitated substantial high-rise development and further established the Downtown as the Eastside's primary employment and retail center. The recent opening of light rail service has increased both visitation and development opportunities, while implementation of the Grand Connection project continues to shape long-term planning efforts. There have been improvements in the quality and quantity of public plazas created through the amenity system. The Downtown has gained approximately 3500 residents, 2200 housing units, six million square feet of office space, twelve and a half million square feet of commercial space, 6000 jobs, 100 businesses, and approximately 50,000 annual visitors.

Despite the positive growth indicators, economic conditions for small businesses have been more challenging. Since the COVID-19 pandemic, the Downtown has experienced a decline in small businesses, prompting consideration of ways the code could better support business retention and growth. Many of the active ground-floor commercial spaces required under the current code are too large for typical small businesses and are often difficult to lease. High Downtown rents further contribute to the challenges. As part of Downtown Livability 2.0, the intent is to explore ways to make spaces more accessible, and to increase activity within public plazas through programming such as events and food trucks.

Mathieu Menard Staff said Downtown Bellevue is continuing its transition toward a more balanced mixed-use environment with a greater residential presence. Long-range planning anticipates approximately 14,500 additional housing units and 37,500 new jobs by 2044. A commonly identified challenge is achieving greater vibrancy outside normal business hours, particularly during evenings and weekends. Accordingly, improving the public realm, pedestrian and bicycle connectivity, and overall Downtown activity levels remain important goals. Concerns regarding development pressures in Old Bellevue were acknowledged, and it was stated that preserving the historic character of Main Street and maintaining opportunities for small businesses will be a specific focus of the project.

The primary intent of Downtown Livability 2.0 is to reinforce the existing policy direction rather than to change the adopted plans. The amendment is intended to refine and improve the existing code so that it better implements the Comprehensive Plan and Downtown Subarea Plan. Input received during the recently completed Housing Opportunities and More Affordability (HOMA) process identified several areas where the development community sought code adjustments, and those issues will be evaluated as part of the project. Open space will remain a central priority, while large-scale changes to building heights or overall development intensity are not anticipated. The expectation is that the focus will be on targeted adjustments involving issues such as floor plates, building setbacks, build-to lines, and other technical standards that could improve code functionality and better achieve the planning objectives. Coordination with internal city departments, including transportation, housing, development review, and the Grand Connection team, will continue throughout the process.

Mathieu Menard said the key objectives of the Downtown Livability 2.0 project include enhancing Downtown activity during evenings and weekends; addressing any remaining code provisions that may hinder housing production following the recently completed HOMA

process; promoting both market-rate and affordable housing; preserving the historic development pattern and character of Main Street and Old Bellevue; and supporting implementation of the Grand Connection project. The intent is to refine the building design standards and to revisit the active-use requirements given that the current code may require more ground-floor commercial space than the market can effectively support. Another focus will be on reducing unnecessary administrative departures from the code where applicants routinely seek and receive the same approvals, thereby streamlining the development process. There are also plans to simplify the land use tables in a manner similar to the Wilburton code and to recalibrate the amenity incentive program to ensure the incentives are aligned with the desired public benefits. The list of potential additions includes incentives for affordable commercial space to support small businesses, along with other adjustments related to pedestrian improvements and business activity. No further changes to the affordable housing requirements are anticipated.

The project kickoff will occur during the second week of June through both in-person and virtual events. The sessions will introduce the project, provide information to the public, and answer questions. Throughout the summer, staff plans to meet with interested stakeholders, attend community events, conduct outreach in high-traffic Downtown locations, and gather input through informal conversations, online resources, and a digital survey. The most substantive Commission and City Council discussions will occur in the fall and early spring as the draft code amendments are developed and refined.

Feedback received from the City Council during the project initiation process generally indicated support for the proposed scope and emphasized the importance of small business retention and outreach. The Council expressed strong support for maintaining the building height framework established in 2017 and showed little interest in revisiting those standards. Similarly, the Council reaffirmed its support for preserving the “wedding cake” approach to building massing and height transitions throughout the Downtown. Downtown Livability 2.0 is intended to be a relatively focused refinement effort rather than a comprehensive overhaul of the Downtown code. The anticipated schedule calls for outreach throughout the summer, followed by review, action, and adoption processes extending into the spring of 2027.

Commissioner Kennedy expressed appreciation for the informational presentation and the planned outreach efforts.

Commissioner Villaveces suggested that pedestrianizing portions of Main Street could significantly enhance Downtown livability by encouraging walking, increasing public activity, and attracting visitors. One approach will be to test temporary street closures during evenings or summer periods to evaluate the public response. Such initiatives have been successful in many cities. Strong support was voiced for efforts to create smaller, more affordable commercial spaces. Many available Downtown office spaces are designed for large technology companies and are inaccessible to smaller enterprises.

Commissioner Nilchian asked if a list exists that identifies the issues that were deferred from the HOMA process to Downtown Livability 2.0. Mathieu Menard said that information had previously been provided in meeting materials, and the offer was made to distribute the relevant references to the Commissioners at a later time.

Commissioner Ferris asked if improvements to bicycle connectivity and the completion of the existing bike lane networks will be considered as part of the amendment. Mathieu Menard explained that transportation infrastructure planning generally falls outside the scope of Land Use Code amendments and is handled through separate transportation planning processes. While

the project may consider pedestrian realm enhancements such as seating, street trees, and similar features, there is no anticipation that there will be significant changes to the adopted transportation standards or major bicycle infrastructure initiatives through the code update.

Commissioner Goeppele commended staff's focus on affordable commercial space and emphasized the importance of ensuring that essential services, particularly grocery stores, remain accessible within walking distance of the growing Downtown residential population. Cautioned was voiced against creating conditions that could lead to a lack of neighborhood-serving retail. The commissioner reflected on discussions from the HOMA process regarding the "wedding cake" concept and questioned why that design principle appears to receive greater emphasis in Downtown planning than in other parts of the city. Mathieu Menard explained that while the concept is more explicitly referenced in Downtown planning documents, similar transitions in building height and scale are routinely incorporated throughout Bellevue. Examples from Wilburton, BelRed, and other growth areas were cited where taller development is intentionally stepped down toward lower-density residential neighborhoods. The principle has been applied consistently even when not formally labeled as a "wedding cake" approach.

Vice Chair Lu asked for additional explanation regarding the observation that portions of the amenity incentive program may be miscalibrated. Specifically, the commissioner asked which amenities appear to be underutilized and may require stronger incentives. Mathieu Menard answered that certain amenities have seen little or no uptake since their creation. One example cited was the alley-with-addresses concept envisioned for the northwest portion of the Downtown, which has not been widely implemented despite being a planning priority. The lack of participation suggests the incentive may not be sufficiently attractive. Some amenities have not functioned as intended after construction. Performing arts spaces were cited as an example, with several projects struggling to secure tenants for those facilities. Downtown Livability 2.0 provides an opportunity to reevaluate such amenities; consider alternative uses for underperforming spaces; and engage both the development community and the public in identifying what types of amenities are working well and what additional features will better support Downtown vibrancy. The project remains in its early stage and more detailed recommendations will be developed following outreach and stakeholder discussions.

Chair Khanloo asked about the public outreach efforts and whether Downtown residents will receive direct notification regarding the project. Mathieu Menard confirmed that extensive digital outreach is planned, including notices distributed through the city's email subscription lists that reach approximately 17,000 recipients. Project-specific contact lists developed through previous planning efforts will also be utilized. The Commissioners were encouraged to urge interested residents and stakeholders to subscribe to the city's planning-related mailing lists to stay informed about upcoming engagement opportunities.

A. BelRed Look Forward Land Use Code Amendment
(7:38 p.m.)

Assistant Director Nick Whipple reminded the Commission that the proposed amendment was first addressed on April 22. The feedback received from Commissioners and the public will continue to be incorporated into draft revisions, and a public hearing is being contemplated as an important milestone. Holding a public hearing will not conclude deliberations but will instead broaden public participation, generate additional input, and provide an opportunity to discuss outstanding issues in a more comprehensive manner before final recommendations are developed.

Nick Whipple said that the proposed approach in regard to the incentive system contemplates a new approach modeled in part on the Downtown system under which the approximately 900-acre transit-oriented development area will be divided into multiple neighborhoods, each with distinct priorities and corresponding incentives. Several topics require additional outreach and internal review and they will be addressed in greater detail at the future public hearing.

Code and Policy Planning Manager Kristina Gallant summarized the key feedback received during the April discussion regarding the proposed street network. The Commissioners had generally affirmed the importance of public access, walkability, and high-quality public infrastructure in an area expected to accommodate significant growth and redevelopment. At the same time, the Commissioners expressed openness to considering alternative approaches that will preserve public benefits while addressing site-specific constraints and development feasibility concerns. There was also support for providing additional flexibility regarding on-street parking requirements. Detailed language addressing that issue will be presented at a later meeting.

In response to that feedback, a new proposal was introduced that would allow certain required public local streets to be replaced with private access corridors under defined circumstances, and only when specific conditions are met. Service corridors are alley-like facilities lacking pedestrian facilities and will not qualify as replacements. Any proposed private corridor will be required to satisfy emergency vehicle access standards; avoid adverse impacts on neighboring properties and the broader circulation network; comply with accessibility requirements; and where necessary utilize legal mechanisms such as easements to preserve connectivity. To strengthen the public realm, the proposal calls for wider sidewalks of at least ten feet rather than the standard eight feet along qualifying private corridors. Projects will also be expected to provide active ground-floor uses along at least 75 percent of the corridor frontage. The staff recommendation was to exempt stream daylighting projects from the requirement.

Kristina Gallant said the proposal builds on a street framework that has already been significantly reduced from earlier concepts. It focuses primarily on critical green street and local street connections. Flexibility has already been incorporated into the draft code by allowing street alignments and intersection locations to be adjusted during project review. The new option to replace certain public streets with private corridors will provide an additional alternative when public street construction proves infeasible. Taken together, the changes will create a balanced framework that maintains connectivity and public benefits while offering greater flexibility for individual development sites.

Kristina Gallant addressed a technical report concerning the BelRed street grid that recently had been submitted by the Bellevue Chamber of Commerce. The report, which was prepared in June 2025, predates both public drafts of the current LUCA proposal as well as the recently adopted Critical Areas Ordinance revisions. As a result, the analysis does not reflect the substantial changes made during the current planning process, including removal of several street segments, revisions to street alignments to better correspond with property boundaries, and the addition of flexibility allowing street and intersection locations to be adjusted during project review. The report was reviewed when originally prepared and it did inform portions of the revised street network proposal, but many of the concerns discussed in the report have since been addressed through subsequent code revisions.

One of the report's principal findings was that the proposed local street grid is not necessary to provide overall transportation capacity. That is not in dispute. However, the purpose of the local street network extends beyond regional traffic capacity. The grid is intended to provide benefits

related to local circulation, public access, utility service, emergency response, loading operations, refuse collection, pedestrian connectivity, and long-term maintenance. While private streets can perform many of those functions, reliance on privately owned infrastructure introduces long-term risks as properties change ownership over time. Potential future maintenance, access, or operational problems could require city intervention or legal action to ensure continued compliance. A limited but interconnected public street network reduces the risks and provides a more durable framework for neighborhood development. The report had not been commissioned by the city and staff had no involvement in establishing its scope or conclusions.

To further illustrate the point, Kristina Gallant highlighted a graphic from the report depicting impacts on a specific property and explained that several of the street segments shown in the illustration are no longer required under the revised LUCA proposal, and that the stream buffer assumptions shown in the graphic do not reflect the updated Critical Areas Ordinance. While acknowledging the importance of technical studies in the planning process, the report no longer accurately represents the proposal currently under consideration and does not provide specific alternatives that will achieve an appropriate balance between flexibility and public benefit.

Returning to the substance of the BelRed Land Use Code Amendment, Kristina Gallant explained that base FAR establishes the amount of development that may occur without the provision of additional amenities. Under the proposal, projects will no longer need to earn bonus floor area in order to access the maximum permitted building height; instead, height limits will be directly available while FAR will regulate development intensity. The mandatory affordable housing requirements will apply regardless of whether a project exceeds the base FAR. Several categories of development were described that will be exempt from the FAR calculations, including up to 1.0 FAR of active-use space, all qualifying affordable commercial space, and all affordable housing meeting the requirements of the code. The exemptions are intended to encourage uses that advance community objectives without reducing the development potential.

The current maximum FAR allowances within BelRed districts subject to the amenity incentive system range from 1.0 to 4.0. Under the revised proposal, base FAR in mid-rise districts will increase to approximately 2.5, while high-rise districts will generally range from 4.0 to 6.0. The proposed treatment of the 116th Avenue NE corridor differs from other districts. The proposed approach reflects policy guidance encouraging additional housing opportunities on the east side of the corridor relative to the west side while also supporting medical and life science uses and directing residential development farther from I-405 due to air quality concerns. The existing regulations prohibit most market-rate residential development within portions of the corridor and limit development intensity to an FAR of 1.0. Under the proposal, residential development will now be permitted outright in the corridor and could ultimately achieve the same maximum FAR as nonresidential projects, but will need to obtain additional capacity through the amenity incentive system. The approach is an incentive-based strategy designed to balance competing policy objectives while preserving flexibility for future development.

With regard to the proposed mandatory affordable housing requirements, Kristina Gallant noted that under the proposal, all development will be required to provide affordable housing through one or a combination of several methods. Options include constructing affordable units on-site or off-site, with ten percent of units generally required to serve households earning 80 percent of area median income or less, subject to adjustments where deeper levels of affordability are provided. The requirements could alternately be met through a fee-in-lieu payment or by dedicating land for future affordable housing development elsewhere within a mixed-use district. The framework mirrors the affordable housing program successfully implemented in the

Wilburton area.

Turning to the proposed amenity incentive system, it was explained that projects seeking additional non-exempt floor area beyond the base FAR will be required to earn bonus points through the provision of approved amenities. Public streets, parks, trails, and similar public improvements will continue to count toward the maximum FAR calculations. Bonus points could be earned through on-site amenities, selected off-site improvements, or fee-in-lieu contributions. Certain amenities will receive enhanced value within specific neighborhoods to reflect local priorities. One significant change from the current BelRed system is the elimination of the existing tiered structure that requires projects to progress through a prescribed sequence of amenities. Under the proposed approach, developers will be able to select from a menu of eligible amenities and receive credit directly for the improvements they choose to provide. The more flexible structure will allow projects to pursue amenities such as stream daylighting or other public benefits without first satisfying unrelated requirements, while still preserving additional focus on priorities within the Arts District Intensive area.

The seven neighborhood districts established through the BelRed Subarea Plan are intended to recognize the area's diverse characteristics and allow incentives to be tailored to local priorities. The 116th Avenue NE district emphasizes medical and life science uses, while the BelRed Station area serves as both a transit-oriented center and the core of the BelRed Arts District Intensive Area. Other districts, such as the area south of BelRed Road, are intended to function as transitional residential areas buffering lower-density neighborhoods. By differentiating the districts, the incentive system can assign greater value to amenities that advance the specific goals of each area.

There are ongoing efforts to support the development of the Arts District Intensive Area. While many arts-related initiatives will occur outside the Land Use Code, the proposal includes provisions designed to encourage the types of amenities and uses envisioned for the district. They include greater flexibility for artistic and creative uses, such as small-scale artisan manufacturing, as well as incentives for public art, outdoor event spaces, and outdoor performance venues. The importance of affordable housing and affordable commercial space as foundational elements necessary to support a thriving arts district was emphasized.

Affordable housing is proposed to earn bonus points for going beyond what is mandatory, and deeper levels of affordability receiving even greater incentives. The proposal includes adding the affordable commercial space program previously adopted in Wilburton to BelRed. Under that program, property owners lease space to qualifying tenants identified through the criteria established in a director's rule and administered with assistance from the city's economic development staff. The rental rates will be capped, and additional incentives will be available when space is leased to businesses that have been displaced or are at risk of displacement from BelRed.

A bonus credit is proposed to be available for dedicating land for parks, providing trails or trail easements, and undertaking stream restoration projects. The comments received earlier in the evening regarding Eastrail access were acknowledged. Additional references to the Eastrail could potentially be incorporated into the code language. Revisions have been made to clarify the eligibility criteria regarding stream restoration to address concerns that the previous language was unclear in regard to what types of restoration activities qualified for incentives, and whether projects can receive credit only for improvements exceeding the baseline critical-area requirements. A regional Transfer of Development Rights program will be included in the list of incentive options; discussions are underway with King County regarding renewal of that

partnership.

A revised process for awarding bonus credit for public art and plazas is proposed. As proposed, projects will continue to receive points based on the appraised value of artistic installations, but the review authority will shift from the Arts Commission to Bellevue arts staff, thereby streamlining administration while retaining professional oversight. Two forms of outdoor plazas are eligible for incentive credit. The first is a traditional public plaza, which will be required to meet minimum size standards and include a variety of public realm features. The second is a newly proposed linear event plaza designed to support activities such as farmers markets and community events along street corridors. Projects incorporating private shared-use paths could receive plaza credit if the pathways include the required plaza features and function as meaningful public spaces.

For projects that meet with green building standards, there is a two-tiered option for earning credits, with different certification pathways and performance standards for either tier. Additional incentives will be available for implementing natural drainage practices and other environmentally beneficial design features.

Having a broad menu of incentive options can offer project flexibility, but it can also dilute the focus. For at least the Arts District Intensive Area, the proposal calls for more of a concentration of the amenities, with at least 75 percent of a project's bonus points needing to be earned through a combination of key district-supporting amenities, including affordable housing, affordable commercial space, outdoor plazas, and public art. Projects providing major public benefits such as stream daylighting, park dedication, or trail dedication will be exempt from the restriction. The balanced approach seeks to preserve flexibility while ensuring that development contributes meaningfully to the district's intended character.

Kristina Gallant noted that language regarding the fee in-lieu approach will be provided at a future meeting. Currently, the BelRed code does not impose a specific limit on the proportion of bonus capacity that can be obtained through fee-in-lieu payments. Future discussions will consider whether limits should be established to encourage greater provision of on-site amenities while still preserving flexibility. Staff will evaluate how fee-in-lieu revenues should be allocated among priority community benefits and how fee levels should be calibrated to balance development feasibility with the goal of encouraging meaningful public improvements. Additional recommendations concerning the Transfer of Development Rights program and flexibility related to on-street parking requirements will also be brought forward at a later date.

The Commission was asked for direction to proceed with a public hearing on July 9. Even if a public hearing occurs in July, additional study sessions and deliberations likely will need to continue afterward before the matter advances to the City Council. Council review and potential action will likely occur after the August recess during the fall legislative calendar.

Chair Khanloo commented that delaying the public hearing could have implications for the City Council's review schedule.

BREAK

(8:08 p.m. to 8:14 p.m.)

Commissioner Nilchian acknowledged the substantial amount of public testimony received regarding the street grid. The primary concern lies with identifying an approach that will encourage redevelopment while preserving streets as a public utility. Staff was asked what

options would be available if the Commission were to move away from a more rigid street-grid framework. Kristina Gallant emphasized that the definition of “rigid” is central to the discussion. From the city’s perspective, significant flexibility has already been introduced into the proposal. While the draft still identifies key street connections, the code now allows street alignments and even intersection locations to be adjusted through project review. The newly proposed option allows certain required public street segments to be replaced entirely with private access corridors when specific criteria are met. Should the Commission want to go further and eliminate defined street segments altogether, the city could instead rely on block-length standards and private circulation corridors to divide large blocks. However, such an approach would reduce certainty regarding future street locations, connectivity, utility access, and long-term public access. Coordination challenges can arise when adjacent projects proceed independently under a highly flexible framework, making it more difficult to ensure that circulation systems align effectively over time.

Nick Whipple stressed that the street network requirements are not new obligations; they have existed as policy since 2009. The current proposal substantially reduces development burdens by removing more than a dozen street segments; increasing flexibility in alignment standards; allowing structures to extend over certain corridors; and increasing development capacity throughout BelRed. The challenge has been in finding an appropriate balance between encouraging development and preserving the reliable connectivity envisioned in the original BelRed plan. The proposed revisions, including the possibility of replacing public streets with private corridors, are an effort to achieve that balance while maintaining the most important connectivity elements.

Commissioner Goepple expressed a preference for maintaining public streets because of the long-term certainty they provide for public access, utilities, and municipal services. Questioned was whether additional flexibility could be incorporated regarding street locations and street design typologies to better accommodate site-specific conditions. Referring specifically to the Albertsons property, the Commissioner observed that the site appears to present opportunities for alternative configurations that could preserve public access while responding more effectively to unique development circumstances. A concern was voiced that the available street typologies appear relatively limited, and the suggestion was made that more creative approaches might be possible. Kristina Gallant held out the Albertsons property as an example of how the proposed flexibility could function in practice. The alternative circulation concept presented by the property owner could potentially be considered through the project review process under the proposed code. Such alternatives would require a detailed analysis to determine if the transportation needs are adequately addressed, along with development intensity and the connectivity objectives. An openness was indicated to reviewing site-specific alternatives, but it was stressed that approving changes to the adopted street framework will require technical information and evaluation. The challenge lies in balancing flexibility with the certainty necessary to support the long-term planning goals.

With regard to street typologies, Kristina Gallant explained that Bellevue currently lacks established standards for publicly dedicated non-vehicular street types. Developing entirely new public street classifications will require a separate and extensive transportation planning effort that is not feasible within the scope of the current LUCA. As a result, innovative circulation concepts such as pedestrian-oriented corridors are more appropriately accommodated through the proposed private street option. The flexibility allows projects to substitute private active-transportation corridors for traditional public streets while still achieving the connectivity objectives.

Commissioner Goepple reiterated an interest in approaches that could maintain public access while reducing impacts on development sites. The concern regarding street typologies is not limited to non-vehicular facilities but extends to the overall design requirements associated with public streets, including sidewalks, landscaping, and related amenities that collectively consume significant site area. Kristina Gallant acknowledged the concern and noted that such requirements involve tradeoffs among multiple public objectives. Wider sidewalks, landscaping areas, and street trees contribute to broader goals such as improving the pedestrian environment, expanding tree canopy, and reducing urban heat-island effects within BelRed. One area where additional flexibility may be possible is the treatment of on-street parking requirements, which is an issue staff intends to revisit in future revisions. Balancing development feasibility with broader public-realm objectives remains a central challenge throughout the code amendment process.

Commissioner Ferris observed that all parties appear to share the same ultimate objective, which is to create a walkable, accessible neighborhood while also ensuring that redevelopment projects remain economically feasible. There is an inherent tension between preserving future connectivity and encouraging near-term development. In other Bellevue neighborhoods the absence of a connected street network has become difficult or impossible to remedy after development occurs. Given the opportunity to shape an entirely new urban district, appreciation was expressed for staff's willingness to work with individual property owners on site-specific solutions that preserve connectivity while minimizing the impacts on development potential.

Commissioner Kennedy praised staff for the extensive outreach and innovation that had transformed what was once perceived as a highly rigid proposal into a more flexible framework capable of balancing competing interests. The staff's description of a "total off-ramp" option will allow property owners to pursue alternatives to the standard public street configuration. An additional explanation was asked for regarding how the process will function in practice, specifically in regard to how a property owner with a large parcel affected by the street grid could propose an alternative development concept and seek approval under the revised code framework. Kristina Gallant said the proposed flexibility will be incorporated into the broader development review process. A property owner seeking to replace a required public street segment will be required to demonstrate compliance with the criteria established in the code. The criteria will then be evaluated as part of the overall project review process, including input from relevant departments regarding issues such as emergency access, accessibility, and circulation. The proposal is designed to be integrated into existing review procedures rather than requiring a separate process.

Nick Whipple added that the current code establishes a very high threshold for eliminating required local street segments; it generally limits such decisions to engineering constraints and transportation considerations. The revised proposal seeks to create a more flexible alternative by allowing for a broader evaluation of site-specific circumstances while still imposing standards intended to preserve public benefits. The purpose of the new framework is to provide developers with greater flexibility through the use of private streets while retaining sufficient safeguards to ensure public access, connectivity, and other community objectives.

Commissioner Kennedy sought clarification regarding whether a property owner could propose a completely different circulation concept that departs from both the public street configuration and the standard private street alternative. Nick Whipple confirmed that the proposed framework will allow applicants to present alternative concepts, provided they satisfy the applicable criteria related to access, connectivity, and other public interests. Emphasized was the fact that the Commission has the opportunity to provide feedback on the specific criteria. The current

proposals include requirements such as maintaining access, avoiding adverse impacts on neighboring properties, providing wider sidewalks, and ensuring active uses along significant portions of private corridors. It was stated that the Commissioners could suggest modifying the standards, either by increasing or reducing requirements, or by identifying alternative measures that should accompany the added flexibility offered through the off-ramp process.

Commissioner Kennedy observed that projects required to accommodate street connections may face burdens that neighboring properties do not and suggested that additional incentives or flexibility might be appropriate for those sites.

Commissioner Villaveces returned to the discussion of the traffic analysis prepared by Traffic Engineers Northwest. Acknowledging that the report predates the current draft and does not fully reflect recent revisions, the Commissioner pointed out that many of its conclusions remain substantially accurate. Nick Whipple reiterated that the report's assumptions have been materially altered by two successive rounds of revisions to the proposed street network, and that many of the street segments identified as problematic in the report have since been modified or removed. The analysis was helpful during earlier stages of the planning process and informed some of the changes ultimately incorporated into the revised proposal.

Kristina Gallant added that the report's principal conclusion, that the local street network is not necessary to provide arterial traffic capacity, is not disputed. However, the city's rationale for maintaining portions of the local street network is not based on regional traffic capacity. Rather, the purpose of the network is to provide local access, circulation, utility connections, emergency response routes, and other neighborhood-scale functions. Traffic models that evaluate the arterial capacity treat large portions of BelRed as a single development area and therefore do not account for the detailed circulation patterns, driveway access points, garage entrances, and localized transportation needs that emerge as individual projects are constructed. The local circulation functions are the primary justification for retaining key elements of the street network, and they are not adequately captured by the type of arterial-capacity analysis contained in the consultant's report.

Commissioner Villaveces pointed out that the report states that at the district level, capacity is dictated by the existing street grid. The traffic analysis and staff's earlier comments both appear to support the conclusion that the broader arterial network can accommodate projected growth. Drawing an analogy to jazz music, the Commissioner suggested that the district-level street framework could provide the underlying structure while allowing individual property owners the flexibility to improvise and solve site-specific challenges. Based on observations from the recent BelRed site tour, the significant topographical differences throughout the area make the argument that predetermined local street alignments can become problematic when confronted with actual site conditions. A performance-based alternative was proposed in which developers would be required to satisfy clearly defined objectives such as block perimeter standards, emergency access, driveway access, refuse collection, and other operational requirements while retaining flexibility in how those objectives are achieved. Developers are often best positioned to understand the unique characteristics of their properties and should therefore have greater discretion in designing internal circulation systems. Kristina Gallant responded that most of the objectives align with the intent of the current proposal. The city is not insisting on a single immutable street alignment and remains open to alternative configurations where they can be demonstrated to meet broader planning goals. Using the example of the large development site referenced earlier in the meeting, it was explained that alternative circulation concepts can be considered during project review. Significant development on such large sites will almost certainly require some form of internal connection, and the city's role is to evaluate whether any

proposed alternatives adequately address circulation, access, and connectivity needs. Even under the current framework, street alignments may be shifted, intersections relocated, and alternative private circulation systems proposed. The difference is that those alternatives will be reviewed through a structured process rather than approved automatically.

Commissioner Villaveces acknowledged that flexibility appears to be increased by the proposal, but expressed concern that property owners may still perceive the process as uncertain because the standards governing alternative proposals are not yet sufficiently clear. It was suggested that if a performance-based option is offered, applicants should be able to understand in advance exactly what criteria they must satisfy. Staff was asked to provide responses to the numerous substantive comments received from the public to help the Commission better understand how the concerns have been evaluated and addressed in subsequent drafts.

A motion to extend the meeting to 10:00 p.m. was made by Vice Chair Lu. The motion was seconded by Commissioner Nilchian and the motion carried unanimously.

Vice Chair Lu stated a preference for maximizing development potential within the district, emphasizing BelRed's strategic location near major employment centers, including Microsoft and Downtown Bellevue. Given its proximity to light rail, BelRed is a particularly important area for accommodating future residents and workers. It makes sense to prioritize development flexibility even if that requires some compromise regarding the street grid.

With regard to active transportation, Vice Chair Lu noted that the area is lacking in terms of safe east-west bicycle connections. The existing east-west corridors such as BelRed Road and NE 20th Street can be characterized as uncomfortable or unsafe for cyclists, while the north-south connections generally appear better suited to feeding traffic toward arterial roadways. A concern was expressed that some of the proposed east-west local street connections could become alternative routes for motorists seeking to bypass major arterials, potentially creating traffic conflicts and reducing safety for pedestrians and cyclists. The east-west corridors should instead emphasize walking, bicycling, and other active transportation modes, while the north-south routes could continue serving a greater share of vehicular traffic and public-service functions. Kristina Gallant explained that the proposed Green Street network is intended to accomplish many of those objectives. Although Green Streets remain public roadways that accommodate vehicles, they are specifically designed with a strong emphasis on pedestrian and bicycle activity through features such as generous landscaping, wider sidewalks, bicycle accommodations, and lower-speed environments. The Green Streets are intended to function almost like linear parks, creating safe and attractive east-west connections throughout BelRed. Retaining a public street framework helps ensure continuity of those connections across multiple properties over time. Reliance on private circulation facilities could make it more difficult to guarantee that long and uninterrupted active-transportation corridors will ultimately be achieved across the district.

Vice Chair Lu acknowledged staff's explanation of the Green Street concept but maintained the view that greater flexibility may be warranted. Private street configurations could potentially provide the contiguous east-west bicycle and pedestrian connections the district needs while also reducing development constraints on individual properties. From the perspective of cyclists, the most important objective is creating safer east-west travel corridors with significant traffic-calming features rather than encouraging additional vehicular traffic along those routes. Nick Whipple noted that a similar discussion occurred during the Wilburton planning process. One concern with restricting vehicle access on designated corridors is that doing so can unintentionally create new constraints for property owners by predetermining where driveways and site access points must be located. Street design that accommodates both vehicles and active

transportation can often provide greater flexibility by allowing developers to adapt access arrangements as projects evolve. Creating corridors that prohibit or significantly limit vehicle access will require additional transportation analysis and extensive coordination with the development community to understand the potential impacts and avoid creating new unintended obstacles to redevelopment.

Vice Chair Lu reiterated that safer bicycle and pedestrian connections remain a priority and expressed interest in identifying locations where the Green Street requirements could be applied more flexibly. A concern was voiced that east-west routes could attract through-traffic and become less comfortable for active transportation users if not carefully designed.

Chair Khanloo offered observations based on experience with a privately owned street in Downtown Bellevue near the Avenue and State development. The corridor is an example of a successful private street that functions effectively for public circulation and the suggestion was made that a similar model could be replicated in BelRed. Chair Khanloo also questioned whether the proposed review process could provide sufficient flexibility for developers to propose alternative street configurations without creating excessive delays or uncertainty during permitting. Nick Whipple explained that the Downtown example differs from BelRed because Downtown does not contain comparable street-grid requirements. Instead, Downtown regulations focus on breaking up superblocks through mid-block connections rather than requiring new public rights-of-way. Street designs similar to the Avenue and State corridor are already allowed throughout significant portions of BelRed where no predefined street segments are required. In areas where the city has identified specific connectivity priorities and requires local streets, the proposed off-ramp process will allow applicants to pursue similar private-street concepts as alternatives. Approximately one-third of the BelRed transit-oriented development area is subject to the more specific connectivity expectations, while other portions already permit greater flexibility.

Regarding the review process itself, Nick Whipple explained that requests to substitute private street solutions for required public streets will be evaluated through the same type of discretionary review process commonly used for large development proposals. The review will occur alongside normal permit review and will involve analysis by the appropriate city departments using current technical information specific to the proposed project. The project-level review is the most appropriate venue for evaluating site-specific alternatives because it allows decisions to be based on actual development proposals rather than broad assumptions applied across the entire district.

Commissioner Ferris expressed concern that requiring active uses along 75 percent of a corridor frontage may be unrealistic given ongoing challenges in filling commercial spaces. Without proposing a specific alternative, the suggestion was made that the percentage should be revisited and potentially reduced.

Commissioner Goeppele reiterated a concern that the available public street options remain overly standardized. Drawing on examples from the Netherlands, the Commissioner referenced woonerf-style streets, which integrate slow-moving vehicles, pedestrians, bicycles, landscaping, and public space within a shared environment. It was questioned why Bellevue's transportation standards appear to limit opportunities for similar public street designs, and argued that greater creativity could help reconcile the competing goals of flexibility, public access, and high-quality urban design. Skepticism was expressed regarding extensive reliance on private streets, and concerns were voiced about long-term maintenance, public access, and the ability to protect public interests decades into the future. Nick Whipple allowed that similar comments had

previously been raised by both Commissioners and stakeholders. The concept has been discussed extensively with the project's oversight and leadership teams, including representatives from transportation, utilities, fire, building, and other departments. The principal challenge is the absence of established standards governing such street types, along with uncertainty regarding maintenance responsibilities and long-term operational practices. Given those unresolved issues and competing departmental priorities, development of a new public street typology is not currently feasible. The staff continue to view the proposed private-street option as the most practical mechanism for accommodating innovative concepts such as woonerfs or other unconventional designs. Such an approach introduces tradeoffs related to long-term reliability and maintenance. Nick Whipple agreed to relay the Commission's concerns and interest in alternative public street typologies to the project's leadership team for further consideration. Commissioner Goepple asked for some research into a publicly owned version of something like a woonerf street rather than relying exclusively on private ownership models.

Commissioner Nilchian asked for additional information regarding the city's experience with private street maintenance and compliance issues, in particular how frequently enforcement actions occur and what level of staff time and public resources are typically required when private property owners fail to meet their obligations. Nick Whipple allowed that the city has limited experience with private streets because they are not a common typology in the city. One example in the Downtown is near the Courtyard Marriott where a private street has experienced ongoing issues involving refuse storage and maintenance concerns. Securing compliance in such situations can be difficult, particularly when older agreements lack robust enforcement provisions. Beyond the legal and administrative challenges, residents generally do not distinguish between public and private streets when reporting problems. Consequently, the city often receives complaints regarding maintenance issues, lighting failures, potholes, and similar concerns, even when responsibility ultimately lies with a private property owner. That can create service challenges and public frustration because the city must first determine ownership and then attempt to facilitate a resolution through the appropriate party.

Kristina Gallant added that maintenance agreements exist for private streets, but when compliance problems arise the city must typically proceed through formal administrative and legal channels. Such efforts may involve notices, hearings, legal review, and appearances before the Hearing Examiner. The processes consume staff time and legal resources and do not always guarantee a timely resolution. While not every private street presents problems, the potential for such issues increases as reliance on privately maintained infrastructure expands.

Commissioner Kennedy echoed the earlier comments regarding the need for clearer standards and expectations and expressed support for developing well-defined performance criteria that will allow property owners to understand from the outset the requirements associated with alternative street configurations, including explicit expectations regarding public access, emergency response, maintenance obligations, long-term responsibilities, costs, and timelines. The suggestion was made that such clarity would benefit both current property owners and future purchasers by reducing uncertainty and streamlining development decisions. Also emphasized was the importance of establishing transparent performance standards for applicants pursuing alternative street concepts, allowing them to design proposals that clearly demonstrate compliance with city expectations. A predictable framework could help expedite review processes while still protecting important public interests.

Commissioner Villaveces returned to the broader discussion of street typologies and flexibility and acknowledging the challenges described by staff. However, dissatisfaction was expressed with the explanation that alternative public street types are not feasible simply because no

established standards currently exist. If private streets present long-term maintenance concerns and public alternatives are constrained by the absence of standards, the city should consider investing effort into developing standards rather than accepting the limitation. It was also observed that flexibility is particularly important within a district intended to foster creativity and innovation. Given the vision for BelRed as an arts-oriented neighborhood, the regulatory framework itself should embody those same values by allowing greater flexibility and encouraging distinctive development outcomes.

Vice Chair Lu agreed with those observations and reiterated support for exploring a broader range of street typologies. Relatively little redevelopment has occurred in BelRed over the past decade. Taking additional time to establish the right framework may ultimately be worthwhile if it results in better long-term outcomes. While continuing to favor flexibility that supports development, the Commissioner expressed interest in ensuring that both the public-private street balance and the available street-design options are calibrated appropriately before substantial redevelopment begins. BelRed is important given that it is envisioned as becoming a future residential district serving employees of major regional employers. As such, there is a clear need to create an environment capable of attracting new residents.

Chair Khanloo asked if staff will have sufficient time before the proposed July public hearing to continue discussions with affected property owners and address the concerns raised regarding the draft proposal. Nick Whipple said the public hearing itself will serve as an important milestone because it will broaden public participation and provide an additional opportunity for feedback. Many of the individuals who testified during the meeting are active property owners who have already been engaged in ongoing discussions. Confidence was expressed that meaningful progress can be made before July, though not all outstanding issues will be fully resolved by that time. Kristina Gallant added that the complexity of the discussion stems in part from differing views regarding what constitutes sufficient flexibility, a topic that has remained the subject of extensive dialogue throughout the planning process. Communication with stakeholders will continue as refinements to the proposal move forward.

Transitioning to the topic of FAR, Commissioner Ferris stated support for establishing a base FAR of 4.0 on both sides of 116th Avenue NE, and for treating the corridor consistently. With regard to the issue of fee-in-lieu payments, Commissioner Ferris said it was surprising to learn that under the existing framework, fee-in-lieu contributions are not dedicated exclusively to affordable housing, that the funds may also support other priorities such as stream restoration and transfer of development rights. Kristina Gallant clarified that that is the case under the current BelRed system. The draft LUCA intentionally contains placeholder language regarding fee-in-lieu provisions because additional policy discussions are still underway. Under the existing framework, fee-in-lieu contributions are distributed according to a predetermined sequence of priorities, whereas the revised proposal may involve a different allocation structure. No final recommendation has yet been made and future discussions will address how fee-in-lieu funds should be distributed among affordable housing, parks, arts-related improvements, transfer of development rights programs, and other community priorities.

Commissioner Ferris suggested a more direct mechanism whereby a developer choosing not to provide affordable housing within a project could instead contribute resources directly toward an affordable housing development elsewhere, rather than routing funds through a more complex fee-in-lieu process. Kristina Gallant said the concept merits additional discussion with housing specialists as the proposal evolves.

Commissioner Goepple agreed with Commissioner Ferris's recommendation regarding

equalizing FAR on both sides of 116th Avenue NE.

Commissioner Nilchian similarly expressed support for Commissioner Ferris's observations and recommendations.

Commissioner Kennedy agreed as well and asked what the implications could be for maintaining a lower residential base FAR on the west side of 116th Avenue NE, adding that some of the designated medical and life sciences district could effectively be opened to residential competition if the FAR differential were removed, which could undermine the corridor's intended purpose. Kristina Gallant said the medical and life sciences corridor occupies a relatively limited portion of BelRed. The FAR distinction represents one of several policy tools intended to encourage those uses. The area's location adjacent to the hospital corridor was identified as a key reason for prioritizing medical and research-oriented development. Nick Whipple said eliminating the distinction will not prohibit medical uses but will increase competition from residential development by making the land equally attractive for multiple development types. The proposal already significantly expands residential opportunities compared to the existing regulations, which prohibit most market-rate residential development within portions of the corridor. Kristina Gallant added that all affordable housing projects are exempt from FAR calculations, meaning the proposed residential FAR differential primarily affects market-rate housing rather than affordable housing developments. Commissioner Kennedy said additional information regarding the medical and life sciences policy objectives would be helpful to have before forming a final opinion.

Commissioner Kennedy echoed the earlier public testimony regarding the amenity incentive system and encouraged staff to consider expanding the range of amenities eligible for incentive credit. The perspective of staff's was sought regarding the testimony asserting that additional FAR is not always a valuable incentive. Kristina Gallant explained that bonus FAR only provides value when a project actually requires additional development capacity. In some circumstances, particularly during current market conditions, projects may not be large enough to utilize the maximum development potential available under the code. Many areas of BelRed are now proposed for high-rise development and already receive substantially increased base FAR allowances. Consequently, some mid-rise projects may achieve their desired scale without needing bonus FAR and therefore may not find the amenity incentive system particularly valuable. With regard to expanding the amenity incentives menu, additional options can certainly be considered, but broadening the list inevitably dilutes the focus on specific community priorities. The principal tradeoff is between flexibility and concentrating investment on the amenities most strongly aligned with the district vision.

Commissioner Kennedy expressed support for the comments received regarding phased implementation of amenities. Given the scale of many proposed master-planned developments, allowing amenities to be delivered over multiple project phases appears reasonable and deserving of further consideration as the code is refined.

Commissioner Villaveces expressed support for the proposal to tie incentives primarily to FAR rather than building height and asked staff to discuss situations in which mass timber projects can reach their practical height limits before utilizing all available development capacity. Kristina Gallant explained that stakeholders involved in mass timber development had provided valuable feedback on the issue. Because certain construction requirements become significantly more complex beyond specific height thresholds, mass timber projects can encounter practical limits that prevent them from fully utilizing available FAR. The proposal increases the allowable floor plate size for residential mass timber buildings in order to provide additional flexibility.

Commissioner Villaveces asked if unused development capacity associated with mass timber projects could potentially be transferred to another property, similar to a localized transfer of development rights program, suggesting that such an approach could encourage mass timber construction while preserving overall development capacity within the district. Kristina Gallant allowed that the concept has not been fully evaluated but agreed that it warrants further consideration.

Vice Chair Lu concurred with the comments made regarding equalizing the FAR standards on both sides of 116th Avenue NE before questioning if the code should more clearly distinguish between stream daylighting and broader stream restoration efforts. Daylighting a stream often requires substantially greater effort and investment than other forms of restoration and the current language does not adequately recognize the differences. Kristina Gallant agreed that additional clarity would be beneficial. While maintaining the view that routine buffer restoration required by existing regulations should not automatically qualify for bonus credit, the code could more clearly define what constitutes a restoration project that goes beyond the baseline requirements and therefore merits additional incentive value.

Chair Khanloo reiterated a desire for a clear accounting of how fee-in-lieu funds are allocated, particularly where affordable housing is concerned. Future recommendations should clearly identify both the sources and uses of funds rather than placing all revenues into a general pool. Kristina Gallant pointed out that the city operates under specific requirements governing the use of fee-in-lieu funds, including defined purposes and expenditure timelines. Although recommendations regarding allocations are still being developed, any adopted program will identify the intended uses of those revenues and will not leave expenditures undefined.

With regard to the overall vision for BelRed, Chair Khanloo commented that many existing buildings in the district do not reflect the creative, arts-oriented environment envisioned in the subarea plan. While the light rail infrastructure and public investment already occurring is positive, ensuring that future development creates a more attractive and vibrant district capable of fulfilling the aspirations of the Arts District concept should be stressed.

Commissioner Goepple referred to the earlier comment regarding access to Eastrail and voiced a concern that while Eastrail connectivity is identified in the subarea plan, it appears to receive limited treatment within the draft LUCA. Kristina Gallant said the code already contains incentive options related to trail connections, although Eastrail is not specifically identified by name. The language could potentially be refined to more explicitly recognize Eastrail connections. Additional information will be provided at a future meeting.

Commissioner Goepple remarked that if the Commission ultimately supports a private-street option, stronger mechanisms should be considered to protect the public interest. The suggestion was made to explore legal remedies such as enhanced easement rights, abatement authority, specific-performance provisions, bonding requirements, or other forms of security that could provide greater assurance of long-term maintenance and public access. Private parties commonly seek such protections in contractual relationships, and similar safeguards may be appropriate where public benefits depend upon privately maintained infrastructure.

Commissioner Nilchian voiced support for the comments of Vice Chair Lu's regarding stream restoration incentives, and Commissioner Goepple's suggestions concerning stronger enforcement mechanisms for private streets. Staff was asked to address the testimony requesting a ten-year vesting period for large master-planned developments. Nick Whipple explained that

Bellevue's current process already allows vesting periods of up to ten years for master development plans when applicants demonstrate compelling justification. Vesting applies primarily to site layout and overall development concepts rather than to individual administrative design reviews that have not yet been submitted. Future building designs will be subject to the code in effect at the time the applications are filed. Extending vesting protection to projects that have not yet been designed or submitted would represent a significant departure from longstanding city practice. The request appears to stem from a desire for additional certainty regarding future phases of large developments rather than concerns about the master development plan process itself.

Commissioner Villaveces returned to the topic of fee-in-lieu contributions and observed that one unresolved policy question is whether projects should be permitted to satisfy all amenity obligations through payments rather than by providing amenities directly on-site. Flexibility is valuable but developments near transit stations have a particularly important role to play in providing affordable housing and other public benefits directly within their projects. Support was voiced for dedicating a portion of fee-in-lieu revenues toward arts-related investments that reinforce the district's cultural identity. Nick Whipple answered that the issues are under active review. Unlike the Wilburton program, which focuses primarily on affordable housing, the BelRed proposal is being designed to support a broader range of objectives, including affordable housing, arts initiatives, park acquisition, stream restoration, and other public benefits. Determining how the funds should be allocated and whether limits should be placed on fee-in-lieu usage requires continued coordination among the parks, housing, arts, and economic development teams. A more comprehensive recommendation will be presented at a future meeting.

Commissioner Villaveces asked if a catalyst or pioneer incentive similar to the program adopted in Wilburton should be incorporated in BelRed to encourage early redevelopment. Kristina Gallant explained that the circumstances in BelRed differ significantly from those in Wilburton. The Spring District effectively served as BelRed's catalyst project following the adoption of the 2009 planning framework, receiving significant flexibility through a development agreement that helped launch redevelopment within the area. Nick Whipple added that redevelopment activity is already occurring in BelRed, even if not at the pace some stakeholders would prefer. Because the district already has substantial momentum and an established pipeline of projects, a new catalyst incentive is not warranted. The Wilburton catalyst program originated through stakeholder requests and Commission direction rather than from the original staff proposal.

Commissioner Kennedy highlighted the prior statements concerning market benchmarking for the amenity incentive program and suggested staff should carefully evaluate how the incentive levels and fee-in-lieu amounts compare with those used in similar jurisdictions. Examining examples from Wilburton and other comparable cities could help determine whether the proposed incentives are appropriately calibrated to encourage desired development outcomes while remaining economically viable.

Vice Chair Lu expressed a preference for holding an additional study session before conducting the public hearing. Several important topics remain unresolved, particularly questions regarding transportation policies and potential responses from the Transportation Department concerning street typologies and flexibility. It would be preferable for the public hearing draft to more closely resemble the Commission's eventual recommendation rather than proceeding to a hearing before the issues are further refined. Nick Whipple allowed that there is no formal deadline requiring immediate action, but cautioned that delaying the public hearing could affect the overall timeline. Because the City Council will soon shift significant attention toward budget

deliberations, postponing the hearing could push consideration of the BelRed LUCA into the first quarter of 2027. Additional study sessions are certainly possible, but extending the schedule will likely delay the ultimate Council review and adoption. Many pending Commission projects involve code and policy updates, which means that adjustments to one project's schedule could have ripple effects on other work program priorities.

Commissioner Ferris agreed with the Vice Chair's position and noted that the unresolved fee-in-lieu framework is particularly significant. It will be beneficial for both the Commission and the public to review staff's specific fee-in-lieu recommendations before a public hearing is conducted so that stakeholders can provide informed comments on the actual proposal rather than on placeholders.

Chair Khanloo concurred and acknowledged the need to balance multiple priorities. Affordable housing should remain the primary beneficiary of any fee-in-lieu program. The Chair also emphasized the unique opportunity presented by BelRed's transit-oriented location, particularly the areas surrounding the light rail stations. The district is one of Bellevue's premier redevelopment opportunities and ambitious planning objectives should be pursued that maximize housing, support high-rise development where appropriate, and create an attractive, vibrant urban environment that fully capitalizes on the proximity to transit.

There was consensus to schedule another study session prior to the public hearing. Dr. Kate Nesse agreed to return with scheduling options.

9. OTHER BUSINESS – None
(9:44 p.m.)

10. APPROVAL OF MINUTES
(9:44 p.m.)

A. April 22, 2026

A motion to approve the minutes was made by Commissioner Ferris. The motion was seconded by Commissioner Goeppel and the motion carried unanimously.

11. EXECUTIVE SESSION – None
(9:45 p.m.)

A motion to adjourn was made by Commissioner Ferris. The motion was seconded by Commissioner Goeppel and the motion carried unanimously.

Chair Khanloo adjourned the meeting at 9:45 p.m.