



Bellevue Planning Commission

May 27, 2026

PLANNING COMMISSION STUDY SESSION ITEM

SUBJECT

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

STAFF CONTACT(S)

Kristina Gallant, AICP, Planning Manager, 452-6196

Nick Whipple, Assistant Director, 452-4578

Development Services Department

POLICY ISSUES

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

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

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION

DIRECTION

INFORMATION ONLY

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

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

BACKGROUND/ANALYSIS

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

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

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

Planning Commission Feedback and Staff Response

The Planning Commission held a study session on April 22 to discuss part of the components of the proposed LUCA. Commissioners expressed support for the overall LUCA approach, and most discussion focused on proposed updates to the local street network.

Staff provided an overview of proposed updates to the BelRed street network, including an option for a project to propose replacing designated local street segments with private streets, under specific conditions. Commissioners expressed concerns with increasing reliance on private streets, while also acknowledging that private streets can be done well, and encouraging staff to evaluate options to “think differently” about what constitutes a public street and otherwise accommodate project-specific creativity. Commissioners agreed that any flexibility should be limited to defined local streets, and defined green streets should be maintained as a requirement.

Currently, the City of Bellevue does not have transportation standards that would allow dedication of public streets that are not designed to the current local street or green street design standards. In order to allow developments to replace public street segments with streets designed for exclusive pedestrian or active transportation use, private street types must be used.

The proposed LUCA provided as **Attachment A** has been updated with language that would provide such an option. This option also acknowledges the benefit being provided to the private property owner by establishing stricter standards to support activating the public realm. Under this option, proposals would have to satisfy the following criteria to have a local street replacement approved:

- Local streets cannot be replaced by service corridors, which is an alley-like typology intended for emergency access and back-of-house functions
- If proposing a street typology that includes sidewalks, such as the flexible access corridor, any sidewalks must be a minimum of 10 feet wide instead of eight feet wide
- The proposal must meet all applicable requirements for emergency vehicle access
- The proposal must avoid creating additional adverse impacts to the surrounding neighborhood or circulation system beyond what is anticipated under the established street network, though potential impacts may be resolved through legal agreements with neighbors, such as access easements

- The proposal must meet the intent of applicable ADA requirements for public rights-of-way
- The proposal must provide active uses along at least 75 percent of the total façade length fronting replacement private access corridors. This provision is optional for proposals daylighting a stream

Components of the Proposed LUCA

Neighborhood Districts

BelRed is very large, covering over 860 acres, and includes areas with varied opportunities and challenges relevant to future development. The updated Belred Subarea Plan defined seven new neighborhood districts, shown on the map provided as **Attachment B**. These neighborhood districts inform priorities for the amenity incentive system, and are as follows:

- North of Northrup
- 116th Avenue NE Corridor
- Spring District Station Area Node
- BelRed Station Area Node
- Two Creeks
- Overlake Village Station Area Node
- South of Bel-Red Road

Arts District Intensive Area

One of the largest changes incorporated with the updated subarea plan was the inclusion of the BelRed Arts District Intensive Area. The plan’s vision is to build and sustain BelRed as a destination for creative and innovative communities, with a wealth of engaging and affordable arts and cultural spaces, events and programs, creative businesses and community-serving organizations.

While most of the work implementing the BelRed Arts District will be led outside the Land Use Code, including with partners like the BelRed Arts District Community Alliance, the Land Use Code serves a role in supporting the spaces BelRed’s arts community needs. Arts policy priorities for the land use code include:

- Incentivizing affordable space for arts and cultural uses
- Providing for and encouraging the development of flexible and affordable arts live/work units
- Permitting arts-focused retail and artisanal manufacturing
- Supporting development of affordable artist housing

FAR, Mandatory Affordable Housing, and FAR Exemptions

At present, base Floor Area Ratio (FAR) in BelRed ranges from 0.5 to 1.0, and maximum FAR ranges from 0.5 to 4.0. The highest maximum FAR limits are applied to limited areas surrounding station areas. These FAR limits fall below recommended supportive densities for transit-oriented development, and when combined with current height limits, also do not support high rise development.

The proposed updates to base and maximum FAR expand upon the established Wilburton framework, and offer significant increases to base and maximum capacity, as shown in **Figure 1**. As noted during the previous study session, the total area allocated for the highest possible densities has also expanded considerably. In high rise districts, there are different base and maximum FARs depending on whether a project is nonresidential and residential, based on the emphasis established for that district. In the case of mixed-use projects, a project is classified based on the use category that constitutes more than 50% of the gross floor area.

Figure 1. Proposed BelRed FAR Limits

	MU-H	MUR-H	MUO-H	MUM-H	MU-M	MUR-M	MUM-M	MUR-L	BR-GC
Base FAR	-	-	-	-	2.5	2.5	2.5	1.0	-
Nonres.	4.0	4.0	6.0	6.0	-	-	-	-	2.0
Residential	6.0	6.0	4.0	2.0 / 4.0*	-	-	-	-	1.0
Max FAR	-	-	-	-	6.0	6.0	6.0	4.0	-
Nonres.	8.0	8.0	8.0	8.0	-	-	-	-	2.0
Residential	Unlimited	Unlimited	8.0	8.0	-	-	-	-	1.0

* Base FAR for residential projects in MUM-H is 2.0 on the west side of 116th Avenue NE and 4.0 on the east side of 116th Avenue NE, consistent with the Subarea Plan

The significant increase to base FAR is also designed to support a new mandatory affordable housing requirement. The BelRed housing requirement is proposed to be the same as the Wilburton mandatory affordable housing requirement. Any development in BelRed, excluding the BR-GC district, with either 10 or more dwelling units or more than 4,000 square feet of gross floor area is required to provide affordable housing through one of the following options:

- On-site or off-site performance, with 10% of all dwelling units affordable to households earning 80% AMI (with lower percentage options for deeper affordability, and the possibility to calculate the provision of off-site units for a nonresidential development);
- Fee-in-lieu payment per square foot of new nonexempt gross floor area;
- Transferring property elsewhere within a Mixed-Use Land Use District for affordable housing development; or
- A combination of these options.

The affordable housing requirement applies to all BelRed development, regardless of whether the project exceeds base FAR. To further support feasibility, the following uses are exempt from the total FAR calculation:

- **Active Use Space:** up to 1.0 FAR of active use space, regardless of whether it was required or not, except for market rate residential units which otherwise meet the definition of active uses
- **Affordable Commercial Space,** as detailed below in “Amenity Incentive System”
- **Affordable Housing,** including mandatory affordable housing

This exemption means that it is technically possible for a project to exceed maximum FAR when providing exempt uses, with total project scale regulated through building height, maximum floor plate size, and other regulations.

The BR-GC district is exempt from the mandatory housing requirement as this district is not able to earn additional FAR through the amenity system, and only received an uplift of 1.0 FAR for nonresidential projects, and no increase for residential projects.

Amenity Incentive System

Under the existing code, any BelRed project may only exceed the base FAR and building height through participation in the amenity incentive system. The existing system is built in a tiered structure, where projects must earn a set quantity of FAR through specific amenities in order to achieve the maximum FAR. The specific order of tiers and quantity of FAR depends on the type of development and location. In concept, this approach allows Bellevue to align the amenity system directly with public priorities. In practice, the tiered system has been problematic, as it does not allow site-specific opportunities (such as stream daylighting) or needs to earn credit over established tiers. In addition, as existing maximum FARs and building heights are higher than is required for midrise development, yet not high enough to support tower development, projects rarely need to progress beyond the first tier of amenities.

Under the proposed LUCA, any BelRed project may only exceed the base FAR through participation in the amenity incentive system. Instead of having a base and maximum height, the code only defines maximum height, meaning that the amenity incentive system only impacts achievable FAR, not both FAR and building height. The LUCA defines specific amenities, and the rate at which each amenity earns bonus points. One bonus point provides one additional square foot of FAR beyond the base and up to the maximum.

Staff have reviewed the current list of BelRed amenities and completed updates to better align amenities with the BelRed vision. Staff have also reviewed this list against the established vision for each Neighborhood District, and propose granting extra credit for certain amenities in specific neighborhoods. The updated list of amenities which may earn bonus points, and neighborhoods where each amenity earns extra credit, is as follows:

- **Affordable Housing** beyond the mandatory component, with additional bonus points for achieving deeper affordability. *Extra credit in BelRed Station, Overlake Village Station, and Spring District Station.*
- **Affordable Commercial** space, either leased to a qualified tenant or dedicated as a commercial condo. *Extra credit in BelRed Station and Two Creeks.*
- **Park land dedication**, consistent with relevant city plans and the BelRed Subarea Plan
- **Trail dedications and easements**, consistent with relevant city plans and the BelRed Subarea Plan
- **Stream restoration**, with a broad definition that can include stream daylighting, buffer restoration, removal of fish passage barriers, and more. Criteria now clarify that buffer restoration projects only earn points for improvements beyond Critical Areas requirements,

while other projects including stream daylighting projects earn bonus points for all improvements.

- **Regional Transfer of Development Rights (TDR)**, in coordination with King County. TDR details are under development with King County.
- **Public Art.** *Extra credit in 116th Ave NE Corridor, BelRed Station, Overlake Village Station.*
- **Outdoor Plaza**, provided either as a standard outdoor plaza or a linear event plaza. Linear event plazas provide additional space for events, markets, and other activations along streets and access corridors. *Extra credit in 116th Ave NE Corridor, BelRed Station, Spring District Station.*
- **Green Building**, with two performance tiers. *Extra credit in 116th Ave NE Corridor, South of Bel-Red Road, Spring District Station.*
- **Natural Drainage Practices.** *Extra credit in South of Bel-Red Road.*

Each amenity is defined further, including required design criteria for eligibility, in the proposed LUCA. Some amenities have more complex criteria which will be updated in separate Director's Rules, including affordable housing, affordable commercial, and green building.

The proposed LUCA removes tier requirements. Outside of the BelRed Arts District Intensive Area, developments may choose any amenity or amenities from the list. Within the BelRed Arts District Intensive Area, at least 75% of any bonus points must be earned from at least two of the following amenities: affordable housing, affordable commercial, outdoor plaza, public art, or nonprofit space. This provides for district-specific focus without setting overly specific tiers, and is similar to an established practice Downtown. This limitation does not apply to projects daylighting streams or dedicating parks or trails.

Fees-in-Lieu

Currently, the LUC provides the flexibility to choose to pay fees-in-lieu instead of on-site performance for any of the tiered amenity options, with no limit on the use of fees-in-lieu. Through the tiering system, a project entirely using fees-in-lieu to maximize capacity will still contribute to separate public amenities, including funds for affordable housing and parks. While the tiering system has been removed to provide flexibility to choose on-site amenities, a version of the tier system could be retained to direct the use of any fees-in-lieu. To generally replicate the current tier system's prioritization, half of fees-in-lieu could be directed to affordable housing, and half to parks, streams and regional TDR.

While the city can be very effective in leveraging fee-in-lieu dollars for development, imposing some form of limit on the use of fees-in-lieu can promote greater implementation of on-site amenities, and result in a better distribution of amenities through the district. In Downtown, for example, in-lieu fees can only be used for up to 50% of a project's amenity points. Wilburton does limit the use of fees-in-lieu.

During the study session, staff will lead the Planning Commission in a discussion of priorities to guide the application of fees-in-lieu in BelRed. This will include the following key questions:

- Does the commission support allocating fees-in-lieu between multiple priority amenities, and does it have alternative suggestions for prioritization?

- Does the commission support setting a maximum percentage of fee-in-lieu usage per project?

Public Engagement

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

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

ATTACHMENT(S)

- A. Strike Draft
- B. Neighborhood and Arts District Map