

## Nesse, Katherine

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**From:** Khanloo, Negin  
**Sent:** Tuesday, May 12, 2026 11:35 AM  
**To:** phyllisjwhite; Johnson, Thara; Nesse, Katherine  
**Subject:** Re: Question Regarding Habitat Connectivity and Habitat of Local Importance Framework

Thanks Phyllis, I am adding city staff to share the info with other commissioners and add to our records

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**From:** phyllisjwhite <phyllisjwhite@comcast.net>  
**Sent:** Monday, May 11, 2026 6:19:00 PM  
**To:** Khanloo, Negin <NKhanloo@bellevuewa.gov>  
**Subject:** Question Regarding Habitat Connectivity and Habitat of Local Importance Framework

**[EXTERNAL EMAIL]** Use caution when clicking links or opening attachments.

Dear Chair Khanloo,

I recently contacted the Washington Department of Fish and Wildlife regarding the ecological function of upper watershed canopy areas and tributaries connected to Kelsey Creek within Bellevue's SR-1 neighborhoods.

WDFW noted that while some biodiversity corridor mapping exists statewide, habitat connectivity and riparian continuity are often most effectively addressed through local planning and GIS frameworks. They also suggested that Bellevue may wish to evaluate whether certain upper watershed tributary corridors and associated priority species habitats could qualify as "Habitat of Local Importance" under the City's critical areas framework.

As Bellevue considers the 2026 Omnibus LUCA amendments and potential SR-1 tree code changes, I would appreciate clarification on whether the City currently has:

- a formal process for evaluating Habitat of Local Importance designations;
- methods for considering cumulative watershed-scale ecological function beyond parcel-level review; and
- planning tools for identifying canopy linkage or wildlife movement corridors associated with Goff Creek and Kelsey Creek tributaries.

Our neighborhood's upper watershed areas appear to function collectively as part of a broader riparian and canopy system, even where individual parcels may not independently trigger mapped critical area protections.

I appreciate the Commission's continued work and understand that growth will continue to occur. We appreciate the City's consideration in balancing growth, environmental resilience, watershed health, and long-term neighborhood livability.

I would appreciate any clarification or direction the Commission or staff may be able to provide regarding these questions.

Thank you for your time and consideration.

Best regards,

Phyllis White  
East Kelsey Creek Neighborhood Association

## Nesse, Katherine

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**From:** Veronica Shakotko <Vshakotko@mbaks.com>  
**Sent:** Tuesday, May 12, 2026 1:47 PM  
**To:** PlanningCommission  
**Cc:** Gallant, Kristina; Whipple, Nicholas; Nesse, Katherine  
**Subject:** MBAKS Written Comments - Omnibus LUCA/Lot Splitting - May 13 Agenda  
**Attachments:** 2026, 5-12 Bellevue PC Omnibus Lot Splitting Comment Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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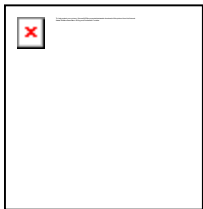
Dear Chair Khanloo, Vice Chair Lu, and Members of the Planning Commission,

In advance of tomorrow evening's public hearing, attached are MBAKS' written comments regarding proposed residential lot splitting language included in the Omnibus LUCA package.

Our comments relate to portions of the proposed language that unintentionally conflict with the intent and plain language of [E2SHB 1096 \(2025\)](#) and [RCW 58.17.145](#) regarding future subdivision of lots created through a residential lot split. Specifically, some language in the current draft could be interpreted to prohibit future subdivision of newly created lots, even though state law states that those lots may still be divided through other legal subdivision processes such as short plats, unit lot subdivisions, or formal subdivisions. The issue stemmed from earlier Commerce guidance that created ambiguity around the issue but was updated and clarified late last week.

We appreciate Bellevue staff working collaboratively on the issue and support staff's clarification of the language to ensure consistency with state law and updated Commerce guidance. If you have any questions, please don't hesitate to ask.

Respectfully,  
Veronica



**Veronica Shakotko** | Senior Local Government Affairs Manager

425.435.8990 | vshakotko@mbaks.com | mbaks.com

335 116th Ave. SE, Bellevue, WA 98004



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**Everyone deserves a place to call home.**



May 12, 2026

Bellevue Planning Commission  
450 110<sup>th</sup> Ave. NE  
Bellevue, WA 98004

RE: Omnibus LUCA – Clarification of Proposed Residential Lot Splitting Language

Dear Chair Khanloo, Vice Chair Lu, and Commissioners:

The Master Builders Association of King and Snohomish Counties (MBAKS), representing nearly 2,500 members, is the largest homebuilders' association in the country. Our members are actively working to create housing for current and future Bellevue residents, and we believe everyone deserves a place to call home.

MBAKS appreciates Bellevue's ongoing work to implement recent state housing legislation and modernize the Land Use Code through the Omnibus LUCA process.

We are writing regarding proposed residential lot splitting language in the Omnibus LUCA package including, for example, language in Section 20.25B.270(A)(1) stating: "An administrative lot split shall only create one additional lot, and newly created lots shall not be large enough to further subdivide."

MBAKS recently raised concerns with Bellevue staff that portions of the proposed language may unintentionally conflict with the plain language and intent of [HB 1096 \(2025\)](#), now codified in [RCW 58.17.145](#). MBAKS supports clarification of this language to ensure consistency with state law and updated Commerce guidance.

The issue stems in part from earlier Washington State Department of Commerce guidance that suggested lots created through a residential lot split could not later be further subdivided. Given the ambiguity created by that earlier interpretation, it was understandable that jurisdictions implementing HB 1096, including Bellevue, would rely on that guidance when drafting local code language. Commerce has since updated its guidance to clarify that future subdivision through other legal subdivision processes is allowed under state law.

[RCW 58.17.145\(7\)](#) states: "If a lot split results in a lot of a size that would allow for further land division, the lot is not eligible for a lot split but may be divided under other applicable land subdivision processes." The intent of HB 1096 was to create a streamlined process for a single administrative lot split while preventing repeated consecutive lot splits. It was not intended to prohibit future division through other legal subdivision methods such as short plats, unit lot subdivisions, or formal subdivisions.

MBAKS has been working with Bellevue staff to highlight Commerce's updated guidance and the underlying statutory language. We appreciate staff's responsiveness and willingness to clarify the proposed code language to ensure



consistency with HB 1096, updated Commerce guidance, and the City's broader housing implementation goals.

Thank you for your consideration and continued partnership on housing implementation issues.

Respectfully,

A handwritten signature in black ink, appearing to read "Shakotko".

Veronica Shakotko | Senior Local Government Affairs Manager  
Master Builders Association of King & Snohomish Counties

CC: Kristina Gallant, Code and Policy Manager  
Nick Whipple, Code and Policy Director

## Nesse, Katherine

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**From:** Kevin Xue <zixue@tesla.com>  
**Sent:** Wednesday, May 13, 2026 9:00 AM  
**To:** PlanningCommission  
**Cc:** Aeli Furtado; Francesca Wahl  
**Subject:** Written Public Comment: May 13 Hearing – 2026 Omnibus LUCA (LUC 20.20.900.C.1.b.ii)  
**Attachments:** Tesla\_WrittenComment\_OmnibusLUCA\_May13.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.**

Dear Chair and Members of the Planning Commission,

Please find attached Tesla's written public comment for the upcoming May 13, 2026, public hearing regarding the 2026 Omnibus Land Use Code Amendment. We are submitting this letter for the official public record to reiterate our strong support for the proposed revision to LUC 20.20.900.C.1.b.ii.

As detailed in the attached letter, the proposed amendment provides a balanced, common-sense solution that maintains the intent of the Tree Retention Ordinance while removing unintended fiscal and structural barriers to clean energy investments. We respectfully urge the Commission to recommend approval of this amendment to the City Council as drafted, which will directly support the deployment of critical EV infrastructure across Bellevue.

Thank you for your time, consideration, and service to the City.

Respectfully,  
Kevin

Kevin Xue

Policy Analyst, North American Charging  
3500 Deer Creek Road, Palo Alto, CA 94304  
E. [zixue@tesla.com](mailto:zixue@tesla.com)



**To:** Bellevue Planning Commission

**From:** Kevin Xue, Policy Analyst, Tesla, Inc.

**Date:** May 13, 2026

**Re:** Continued Support for 2026 Omnibus Land Use Code Amendment – Proposed Revision to LUC 20.20.900.C.1.b.ii

Dear Chair and Members of the Planning Commission,

Following up on our previous written testimony submitted on April 7, 2026, Tesla writes to reiterate our strong support for the proposed revision to LUC 20.20.900.C.1.b.ii.

As currently written, the Land Use Code inadvertently creates a structural and financial barrier to deploying electric vehicle (EV) infrastructure in Bellevue. Because the installation of EV chargers inherently requires repurposing existing parking stalls, these minor modifications currently trigger major "Development Activity" requirements. For example, Tesla's proposed EV charging project at Eastgate Plaza requires converting just three existing parking stalls. Under the current code, this triggers a disproportionate mitigation requirement to cure the site's historical tree deficit, amounting to planting 31 trees or paying a \$40,300 fee-in-lieu.

The proposed Omnibus amendment provides a balanced, common-sense solution. By removing "changes in the area devoted to parking and circulation" from the Development Activity trigger, the City will protect the original intent of the Tree Retention Ordinance while removing unintended fiscal obstacles for clean energy investments.

This amendment directly supports the equitable mobility goals outlined in the City's 2024 EV Roadmap, including the target of deploying 275 additional publicly accessible DC fast chargers by 2030.

We respectfully request that the Planning Commission recommend approval of this amendment as drafted to the City Council. We also want to extend our gratitude to City staff for their responsiveness, collaboration, and hard work in advancing this solution.

Thank you for your time and consideration.

Respectfully submitted,  
Kevin Xue

**Kevin Xue**

Policy Analyst, North American Charging

Tesla, Inc.

3500 Deer Creek Road

Palo Alto, CA 94304

## Nesse, Katherine

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**From:** phyllisjwhite@comcast.net  
**Sent:** Wednesday, May 13, 2026 10:57 AM  
**To:** PlanningCommission; Khanloo, Negin; Ferris,Carolynn; Lu, Jonny  
**Subject:** Public Comment – Omnibus LUCA SR-1 Tree Code Changes  
**Attachments:** Bald Eagle.jpeg; Blue Heron\_20260111\_084709\_Gallery.jpg; Bob Cat.png; Trees East Wilburton2026-05-13 010107.jpg; 5-13-2026 Omnibus LUCA Public Comments.docx

**[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.**

Dear Chair Khanloo, Vice-Chair Lu, and Members of the Planning Commission,

I am writing regarding the proposed Omnibus LUCA amendments, specifically the changes to apply SR-2 to SR-4 tree retention standards to SR-1 properties.

I am submitting this on behalf of residents in the East Kelsey Creek neighborhood (east of NE 8th Street and south of Bel-Red Road). While this letter reflects input from a smaller group of neighbors due to timing, it represents a broader concern shared throughout our area. Given these concerns, I respectfully request that the Planning Commission not recommend adoption of the proposed SR-1 tree code changes.

Our neighborhood is not simply a collection of individual lots. It functions as part of a connected ecological system within the upper watershed of Kelsey Creek. The tree canopy here supports wildlife movement, riparian continuity, and stormwater function in ways that extend beyond parcel boundaries.

Residents regularly observe wildlife including great blue herons, bald eagles, hawks, deer, and bobcats. These are not isolated occurrences—they reflect an active habitat corridor supported by the existing canopy.

I respectfully request that the Planning Commission not recommend adoption of the proposed SR-1 tree code changes. At a minimum, additional analysis is needed to evaluate cumulative impacts on canopy, habitat connectivity, and watershed function before reducing tree retention standards in SR-1 neighborhoods.

Thank you for your consideration.

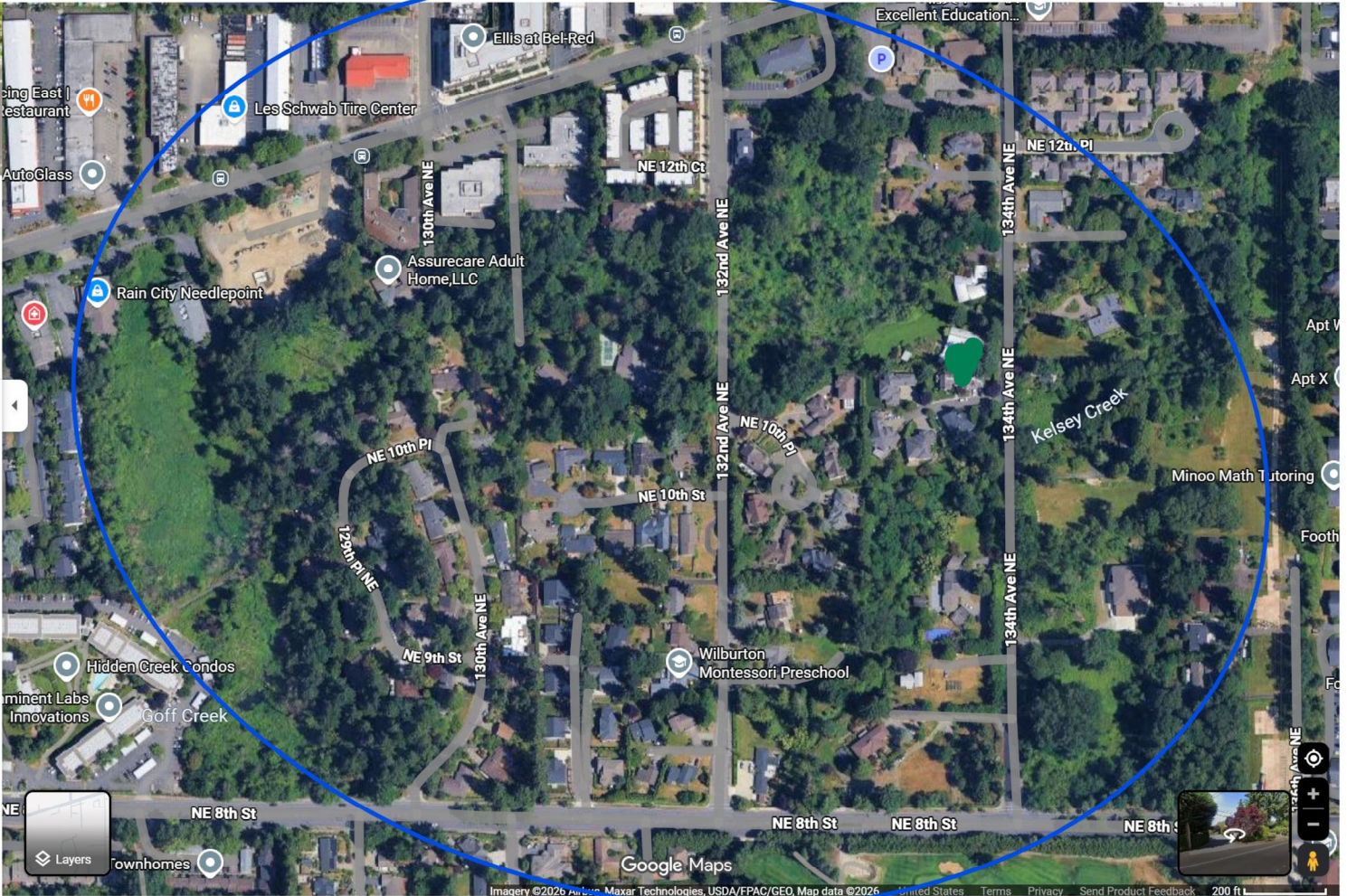
Sincerely,

Phyllis White  
Board President  
East Kelsey Creek Neighborhood Association









Please include this letter in the official record.

## Request to Not Adopt SR-1 Tree Code Changes – Omnibus LUCA

May 12, 2026

Dear Chair Khanloo, Vice-Chair Lu, and Members of the Planning Commission,

On behalf of residents in the East Kelsey Creek (East of NE 8<sup>th</sup> Street and South of BelRed Road) / SR-1 neighborhood, we are writing regarding the proposed Omnibus LUCA amendments and the alignment of SR-1 tree code standards with SR-2 through SR-4.

We support reasonable growth and understand the need to accommodate additional housing. However, we strongly oppose the proposed reduction in tree credit requirements—approximately 60% for single-family development and 62.5% for multiple dwellings. This change significantly weakens overall tree retention standards in SR-1 areas.

Our neighborhood, formerly zoned R-2.5, includes upper watershed lands connected to Kelsey Creek and its tributaries. These areas do not function as isolated parcels. They function as a connected ecological system. Residents regularly observe wildlife such as great blue herons, bald eagles, hawks, deer, and bobcats, as well as fish habitat supporting salmon, demonstrating that these areas provide meaningful habitat and wildlife movement corridors.

Recent feedback from the Washington Department of Fish and Wildlife emphasizes that habitat connectivity, riparian continuity, and canopy linkage are critical, especially in urbanizing watersheds where parcel-level review can miss cumulative impacts. WDFW also noted that Bellevue may consider updating its “Habitat of Local Importance” designations to better recognize and protect these interconnected systems.

We respectfully request that the Planning Commission not recommend adoption of the proposed SR-1 tree code changes. There is no clear, evidence-based analysis showing that a reduction of this scale will avoid significant cumulative impacts to canopy, habitat connectivity, or watershed function. The conclusion that these changes would not result in significant environmental impacts has not been adequately supported, particularly when considering long-term, incremental redevelopment.

At the same time, Bellevue has already made meaningful progress toward its housing goals. As of May 2026, the City has met its original 2017 goal of building or preserving 2,500 affordable housing units ahead of schedule. This shows Bellevue can meet its obligations under the Growth Management Act without weakening environmental protections in SR-1 neighborhoods.

Given this, we request that the existing SR-1 tree code standards be maintained.

We also request clarification on the following:

1. How will the City ensure that reduced tree credits do not lead to cumulative loss of canopy and habitat connectivity across SR-1 neighborhoods?
2. How are watershed-scale functions—such as wildlife movement and riparian continuity—being evaluated alongside parcel-level review?
3. Has the City evaluated whether upper Kelsey Creek tributaries and surrounding canopy systems qualify for Habitat of Local Importance consideration?

4. How will the City reconcile these changes with Best Available Science regarding habitat fragmentation and canopy linkage?

While the Omnibus materials suggest impacts will be addressed through project-level review, it is not clear how that approach accounts for cumulative, long-term effects across multiple properties.

We urge the Commission to find that these changes are not consistent with the City's obligations to protect critical areas and maintain ecological function. We request that SR-1 retain its existing tree code standards, as the proposed reductions would diminish canopy, reduce habitat value, and negatively affect the quality of life in our neighborhood.

Thank you for your consideration.

Phyllis White  
Board President  
Tim Hay  
Board Vice President  
East Kelsey Creek Neighborhood Association  
On Behalf of Neighborhood Residents

**Bellevue Residents' Signatures**

Brianna Daniels  
Neha Lande  
Carol Kinsman  
Loretta Lopez  
Tammy Miller  
Nicole Myers  
Cheryl Wang  
Ching-Chao Wang  
Lee White  
Gary Wilke  
Linda Ulrich

## Nesse, Katherine

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**From:** Ming Zhang <ming@mza-us.com>  
**Sent:** Tuesday, May 19, 2026 3:08 PM  
**To:** PlanningCommission  
**Subject:** Comments on base residential FAR on west side of 116th Ave NE. MUM-H zoning  
**Attachments:** Letter to City of Bellevue-signed by all 05.19.2026.pdf

You don't often get email from ming@mza-us.com. [Learn why this is important](#)

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Dear Planning Commission Members,

Attached please find the comments and concerns on the topic from some property owners along 116<sup>th</sup> Ave NE.

Thank you for your attention, and feel free to let me know if you have any questions.

Best regards,

Ming Zhang, FAIA

MZA Architecture

Dear Planning Commission Members,

We are writing as a group of property owners, developers, and design professionals actively involved in projects along the 116th Ave NE corridor to provide input on the proposed Mixed Use Medical-High (MUM-H) zoning framework.

We strongly support the City's vision to establish this corridor as a high-density, mixed-use district anchored by medical, life science, employment, and residential uses. We believe this is a forward-looking and strategically important direction for Bellevue's long-term growth.

However, we would like to raise concerns regarding the proposed residential FAR structure on the west side of 116th Ave NE and offer recommendations to help ensure the successful implementation of the City's vision.

Under the current proposal:

- West side of 116th Ave NE: Residential base FAR = 2.0
- East side of 116th Ave NE: Residential base FAR = 4.0

While we understand the policy intent to prioritize employment uses on the west side, we are concerned that the current framework may unintentionally constrain the feasibility of delivering the type of mixed-use urban environment envisioned by the City.

Importantly, in the City's initial December 2025 proposal, both the east and west sides of 116th Ave NE were proposed at residential FAR 4.0. We respectfully ask the Commission to reconsider the rationale for reducing the west side residential FAR from 4.0 to 2.0, particularly given that the overall planning objectives for a vibrant mixed-use corridor remain unchanged.

Based on our collective experience delivering mixed-use and high-rise developments in Bellevue:

- Medical and life science uses require longer lead times and specialized tenants
- These uses typically do not initiate early-phase redevelopment independently
- Residential components are often essential to:
  - Enable project financing
  - Support phased implementation
  - Activate the public realm
  - Create the critical mass needed for a successful urban district

At a residential FAR of 2.0, many sites on the west side may face:

- Reduced economic feasibility
- Delayed redevelopment timelines
- Increased likelihood of underutilization in the near and mid-term

More importantly, the proposed disparity between the west and east sides of 116th Ave NE may create unintended and inconsistent urban design outcomes.

For example:

- A property on the east side may be able to support a 20- to 30-story residential or mixed-use tower under FAR 4.0, while a similarly sized site directly across the street on the west side may only support a significantly smaller and shorter building under FAR 2.0.
- Two adjacent sites with similar transit access, visibility, and infrastructure capacity could experience dramatically different redevelopment potential solely due to their position across the street from one another.
- The west side may become economically disadvantaged compared to the east side, despite both sides being intended to function together as one integrated urban corridor.

This imbalance may also create an abrupt and visually inconsistent urban skyline condition between residential and medical towers. The result could be a corridor where:

- Residential buildings on the west side remain comparatively low-scale and undersized;
- Medical or institutional towers rise significantly taller and larger nearby;
- The west side may remain undeveloped, with the existing one-story buildings, for a very long time, while the East side will be well developed with 8 to 24-story new buildings. and
- The transition between building forms becomes visually harsh rather than cohesive and urban in character.

Instead of creating a balanced mixed-use skyline, the current proposal risks producing an uneven urban fabric with sharp contrasts in scale and massing between neighboring developments.

We believe that increasing flexibility in residential FAR would better support the City's stated objectives:

- Delivering active, pedestrian-oriented mixed-use environments
- Enabling medical and life science integration over time
- Creating a vibrant 18-hour district
- Supporting Bellevue's urgent housing needs
- Enhance Medical programs by providing more supporting amenities, especially related to Living, such as places for young doctors, travelling nurses, active seniors, etc.
- Encouraging timely redevelopment and investment

Without sufficient residential capacity, it may be difficult to achieve the critical mass necessary to support these outcomes.

We respectfully suggest that the City consider a more flexible framework, such as allowing residential FAR up to 4.0 on the west side of 116th Ave NE when projects:

- Include medical, life science, or employment-generating uses;

- Provide public benefits consistent with City incentive programs; or
- Are designed to accommodate future conversion to employment uses.

This approach would maintain the City's employment objectives while ensuring projects remain economically viable, urbanistically balanced, and realistically deliverable.

We share the City's vision for this corridor and remain committed to helping bring it to life. Our goal is to ensure that the zoning framework results in projects that are not only well-designed, but also feasible, timely, and capable of creating a cohesive urban environment for Bellevue's future.

We would welcome the opportunity to further discuss these considerations or provide additional project-based analysis.

Thank you for your leadership and thoughtful planning efforts.

Sincerely,

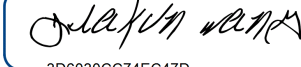


Hank Zhou  
ZML Holdings  
1611 116th Ave NE

Signed by:


  
EEC6FA7245994BC...  
Ming Zhang  
MZA Architecture  
1911 116th Ave NE

Signed by:

  
3D6030CC74EC47D...  
Jiakun Wang, MD  
11514 NE 21st St

James Kim  
With Brothers, LLC  
11542 NE 21st St

DocuSigned by:

  
08C620C6712F47A...  
Ming Zhao  
11512 NE 19<sup>th</sup> St.

## Nesse, Katherine

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**From:** Jazmine Smith <jazmine@futurewise.org>  
**Sent:** Tuesday, May 19, 2026 4:56 PM  
**To:** PlanningCommission; Khanloo, Negin  
**Cc:** Whipple, Nicholas; Gallant, Kristina; Joe Fain; Patience Malaba; Brady Nordstrom  
**Subject:** EHR BelRed Letter

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**Flag Status:** Flagged

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**[EXTERNAL EMAIL] Use caution when clicking links or opening attachments.**

Dear Bellevue Planning Commissioners,

Thank you for the opportunity to engage and comment on the BelRed Look Forward. Please see our comments [here](#).

Best,

**Jazmine Smith** (she/her)  
Director of Local Advocacy



**future  
wise**

Futurewise  
1201 3rd Ave, Suite 2200  
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[Book time to meet with me](#)



May 15, 2026

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

**Re: BelRed LUCA — Street Grid as an Impediment to Affordable Housing**

Dear Chair Khanloo and Members of the Commission,

On behalf of the Eastside Housing Roundtable (EHR), we appreciate the opportunity to share our perspective on the BelRed rezoning. In particular, we are writing to express our concerns with the proposed street grid that has proven to be a material impediment to housing production within the sub-area.

Every foot of roadway required by the current grid is land that cannot be used for housing. The City is asking private property owners to construct large roads, 50 to 60 feet wide in many cases, that are simply not needed. Traffic modeling for the 2044 Comprehensive Plan confirms that the existing arterial network meets build-out capacity without this new local grid. Requiring expensive, high-impact roads that permanently remove flexibility and developable land from the housing supply is the wrong trade-off for a transit-oriented district (TOD) striving to meet the affordable housing goals outlined in the 2044 Comprehensive Plan.

The financial burden extends far beyond the road surface. Grade changes required to construct new roads through BelRed's sloped and high-water-table terrain have proven extraordinarily expensive. That construction cost directly erodes the financial feasibility of the housing projects those roads are ostensibly meant to serve.

Importantly, affordable housing, which already operates on thin margins, is the first casualty when upfront infrastructure exactions balloon.

We respectfully urge the Commission to direct staff to:

1. **Shift to a Performance Standard (The Wilburton Model):** Eliminate the mandatory street grid map and replace it with the flexible connectivity standard, such as a 1,200-foot maximum block perimeter which is already proposed.
2. **Prioritize Pedestrian Connectivity Over Cars:** Allow adaptable corridors—including pedestrian paseos, and shared-use paths—to satisfy connectivity requirements instead of demanding full-width vehicular roads.
3. **Allow Private Maintenance with Public Access:** Public connectivity does not require public fee-title ownership. Permit developers to build and maintain private streets and pathways, secured by 24-hour public access easements, saving the City long-term maintenance costs.

4. **Adopt a Robust Local Street Waiver:** While we vehemently maintain that no fixed vehicular streets be required, if any were to be retained in the final plan, the City must explicitly allow projects to bypass grid requirements when faced with severe topographic, environmental, or ownership fragmentation barriers. Staff's proposed "private street" waiver process is a great place to start.

The goal for BelRed is housing production and walkable connectivity, not a conventional two-lane road network with parking lanes. The subarea has tremendous potential to be the fastest growing TOD in the state, but only if the code enables the development of affordable and market rate housing rather than inhibit it.

The structural problems are well-documented and recur consistently:

- **Grid lines ignore property boundaries.** Alignments force roadways to split parcels between two owners, rendering independent development impossible without complex, costly coordination that is unrealistic and which the current code does not facilitate.
- **"Half-street" requirements penalize first movers.** The first developer must construct an oversized right-of-way that cannot fully function until an adjacent parcel develops, often decades later. This is a massive structural disincentive to early investment.
- **Topography and critical areas are ignored.** Mapped alignments cross steep grade changes, wetlands, and streams, or terminate directly into light rail stations. Forcing owners to build roads that physically cannot be constructed acts as an effective prohibition on development.

These are not theoretical concerns. As Councilmember Nieuwenhuis noted at the September 2024 Council meeting: *"My concern is in five years we look back and development is nowhere near where we want it due to the burden on developers to develop the street grid."* BelRed has already fallen severely behind its housing targets. Without meaningful change, it will remain stalled.

Eliminating the vehicular street requirements and solving the connectivity issue with block frontage perimeters, private roads, more pedestrian-friendly typologies, will create a superior user experience without impeding the development of housing. The City's articulated goals are important, but are already resolved through the development process and elsewhere in the code.

1. **Claim: The "grid" is needed for hyper-connectivity.**  
**Response:** Connectivity is a network outcome, not a road-width specification. The 1,200-ft block perimeter requirement already proposed in the LUCA draft, will fully deliver the ped/bike/shared-use connections called for in the Subarea Plan's vision.
2. **Claim: Private streets restrict access and deliver less public benefit.**  
**Response:** Private streets are indistinguishable from public local streets to the user, and Bellevue examples (Avenue Bellevue, Spring District) routinely deliver better pedestrian design. Public access can be guaranteed by a recorded easement as condition of permit; likewise, utility rights are already covered under standard city easements required of all developments.
3. **Claim: Private streets can't be maintained.**  
**Response:** Many private streets are already being well-maintained across Bellevue today through recorded maintenance covenants, CC&Rs, code-enforcement authority, and access easements. A multi-hundred-million-dollar project has more incentive than the City to keep its front door clean.
4. **Claim: Transportation can't maintain different typologies.**  
**Response:** Exactly right. Private streets reduce Transportation's burden. Private typologies are maintained by the owner. Fewer City-owned local miles, same public connectivity.

5. **Claim: Local streets are needed for fire access.**

**Response:** Fire access is already governed by NFPA and the adopted International Fire Code. No project is approved without compliant access. This is independent of the grid and already solved.

6. **Claim: "Trapped parcels" will be created.**

**Response:** All affected parcels already have legally binding access easements with their neighbors. Where they don't, a street waiver can be conditioned on providing a Shared-Access Agreement. It is more likely that it will result in a "trapped roadway" that starts nowhere and goes nowhere.

7. **Claim: Fixed streets are needed for intersection alignment.**

**Response:** A simple design standard, not a code-mandate solves this. Curb-cut spacing, right-in, right-out turning, and pedestrian signal design are tools already used citywide, absent fixed streets.

Most importantly, we do not need this rigid map to achieve the walkable connectivity the City and public mutually desire. Wilburton, a higher-density TOD subarea with taller buildings and higher FARs, does not impose a mandatory street grid. It uses a flexible framework, and the development community has responded with active interest and unprecedented housing applications.

City staff has made excellent progress on many aspects of the BelRed code, and we sincerely appreciate their ongoing partnership to achieve our mutual goals. Thank you for your hard work in supporting and leading these efforts.

Sincerely,



**Patience Malaba**  
Executive Director  
Housing Development Consortium



**Joe Fain**  
President & CEO  
Bellevue Chamber of Commerce