#### Section 1: Building design and public realm

1.1. How does the LUCA's building design requirements promote light and air, and how does it compare to other areas in Bellevue in terms of floorplate size, tower orientation, and upper-level stepbacks?

#### Response:

The LUCA's building design and envelope strategy balances flexibility with standards that enhance the pedestrian experience, street-level openness, and skyline views. The building design approach creates two distinct parts of a high-rise building—base (podium) and tower through varying floor plate sizes and required facade modulation at certain heights.

At the street level, the base is limited to a height of about 55 feet and overhead weather protection is required in most locations to frame the pedestrian environment. Above the building base, floor plates must reduce in size, forming smaller floor plates for the tower to promote porosity for natural light, air, and sky views. Tower separation requirements of 60 feet also apply to provide openness and solar access.

Comparison to Downtown:

- Wilburton ("base-tower" approach):
  - Below 55': unlimited floor plate size
  - Above 55':
    - Nonresidential: 30,000 Gross Square Feet (GSF)/floor
    - Residential: 16,000 GSF/floor
- Downtown Bellevue ("base-middle-top" approach):
  - Below 40': unlimited floor plate size
  - Above 40':
    - Nonresidential: 20,000–30,000 GSF/floor
    - Residential: 20,000–22,000 GSF/floor
  - Above 80':
    - Nonresidential: 13,500–24,000 GSF/floor
    - Residential: 13,500 GSF/floor

Downtown's floorplate controls are more restrictive than Wilburton's, requiring smaller floorplates above the base and additional reductions at higher elevations. Upper-level stepbacks are also required Downtown along the perimeter, in Old Bellevue, and along NE 8th Street, NE 4th Street, and Bellevue Way NE. In contrast, Wilburton's framework offers greater flexibility while still promoting high-quality design.

The LUCA's massing standards are carefully coordinated with block controls, which limit perimeter block lengths to 1,200 feet, restrict north-south block dimensions to 350 feet, and establish access corridor width requirements. Together, these standards are intended to

maintain solar access, preserve east-west view opportunities, and avoid a canyon effect at street level. If access corridors are narrowed further, corresponding adjustments to building massing would be necessary to prevent over-enclosure and maintain the balance the LUCA establishes between building form and the public realm.

The LUCA also allows significant development flexibility to maximize site potential. Most access corridors, except Local Streets, may be private, enabling underground parking structures and allowing building segments up to 75 feet wide to span over these corridors. Cantilevering over sidewalks is also permitted, further expanding usable site area without increasing the perceived density from the street.

Finally, the LUCA does not require upper-level stepbacks. These were intentionally removed to allow denser, more efficient development, consistent with feedback from property owners, developers, and the Planning Commission.

1.2. In what ways does the LUCA enhance the pedestrian sidewalk experience?

Response:

The LUCA is designed to create a comfortable, safe, and engaging pedestrian environment through a combination of streetscape and building design requirements.

Along streets, the LUCA ensures a high-quality pedestrian experience by requiring adequate sidewalk widths and amenity zones (such as landscape strips) to provide a clear separation between pedestrians and vehicle traffic, enhancing both comfort and safety.

Building design standards further improve the pedestrian experience. Overhead weather protection is required in most areas, shielding pedestrians from rain and encouraging year-round sidewalk activity. In addition, the LUCA requires ground-level activation by requiring "Active Uses" — such as shops, restaurants, and other pedestrian-oriented spaces — along key access corridors. Active uses must occupy between 25 to 50% of the ground-level frontage on most corridors and 75% along major pedestrian routes like Eastrail and the Grand Connection. Together, these standards are intended to foster vibrant, safe, and dynamic public spaces that support a lively urban experience.

1.3. Will neighboring properties be able to collaborate to create shared public amenities, like open spaces or access corridors?

Response:

Yes, neighboring properties can create shared public amenities, such as open spaces and access corridors.

While each project must independently meet the applicable requirements, we anticipate that many developments will coordinate with adjacent sites—for example, by constructing partial-width streets that are completed as the rest of the block redevelops. Open space requirements are also structured to allow for joint development. In key locations like the Eastrail corridor, coordination between multiple properties is anticipated as certain properties must contribute toward the development of the Major Public Open Space, as outlined in LUC 20.25R.030.C.6.a.

Collaboration between properties helps achieve a more connected, vibrant, and efficient public

realm, and the LUCA is designed to support and facilitate these opportunities.

#### Section 2: Local streets, other access corridors, and sidewalk use

2.1. Why does the LUCA require local streets to be publicly dedicated rights-of-way?

#### Response:

The LUCA requires a limited number of streets in the 300-acre TOD area to be publicly dedicated rights-of-way. These are referred to as "local streets" in the LUCA and they are critical to the long-term success of the Wilburton TOD as it grows. These streets are essential to promoting walkability, providing property access, supporting new development, and connecting the area to Bellevue's broader arterial street network.

While the LUCA encourages the creation of small blocks, it doesn't inherently guarantee a walkable grid pattern. The inclusion of a few local streets helps establish this grid—similar to Downtown and what's envisioned for BelRed—by ensuring strategically placed, publicly owned streets provide direct connections to arterials and the Wilburton light rail station.

Public dedication ensures that these streets are fully integrated into the city's transportation system, supporting safe and efficient pedestrian and vehicle circulation. Requiring a few strategically placed public streets also eliminates the risk of depending on private property owners for a complete walkable grid, essential access, and connectivity as the area continues to develop.

In addition, public streets guarantee that the City will maintain the infrastructure, including pavement, sidewalks, landscaping, lighting, crosswalks, ADA features, snow removal, special event management, construction management, and underground utilities. This ensures consistent long-term quality and reliability for all who live, work, and travel through the area on the local streets after development is complete.

Public streets also allow the City to enforce important safety measures such as speed limits, parking regulations, and sidewalk accessibility standards. This helps create a safer, more predictable environment for pedestrians, cyclists, and drivers on the local streets.

To summarize, requiring a few public streets directly supports Wilburton's vision as a walkable, transit-oriented neighborhood. Requiring these local streets in limited locations will help create an inclusive, connected, and vibrant community for everyone.

# 2.2. Why is the proposed north-south local street between NE 12th Street and NE Bel-Red Road, east of 120th Avenue NE, necessary?

#### Response:

The proposed north-south local street in this location strengthens the north-south connectivity within this portion of the Wilburton TOD area bounded by 120th Avenue NE, 124th Avenue NE, NE 12th Street, and Bel-Red Road. The need for this connection was identified through a comprehensive local street development process, which included:

• A detailed review of access needs specific to Wilburton, with a focus on enhancing pedestrian, bicycle, and vehicle circulation;

- An evaluation of the BelRed planning framework, including the alignment of streets identified in BelRed to support consistent and integrated development patterns;
- An analysis of desire lines, reflecting where people naturally want to travel within and through the TOD;
- An assessment of gaps in the existing and planned street network, highlighting the need for additional north-south connections to improve accessibility.

This local street will ensure high quality north-south oriented walkability and access in this portion of the Wilburton TOD area as well as serve as a catalyst for grid pattern development.

# 2.3. How does the LUCA recognize that not all sidewalks need to function the same way?

# Response:

The LUCA recognizes that not all sidewalks serve the same function by establishing a flexible hierarchy tailored to different street and site contexts. Sidewalk widths vary depending on the type of street or access corridor, supporting Wilburton's vision for a walkable, urban neighborhood while balancing space needs across the district.

Specifically, the LUCA requires:

- Wider sidewalks (10 feet) along all public rights-of-way such as NE 8th Street, 116th Avenue NE, NE 4th Street, 120th Avenue NE, and new local streets. These wider sidewalks create a comfortable pedestrian environment on all city-maintained streets and provides scale as these streets, particularly the few new local streets, are established adjacent to 100 to 450 foot building heights with build-to lines at the back of the sidewalk.
- Moderate sidewalks (8 feet) along flexible access corridors that serve dense, mixed-use development and help form smaller, walkable blocks. These corridors are designed to support high pedestrian activity and establish legible block patterns on sites 105,000 square feet or larger.
- Narrower sidewalks (6 feet) along commercial driveways serving sites smaller than 105,000 square feet, where Transportation determines that a sidewalk is required. This provides basic pedestrian access without overbuilding sidewalk space in lower-traffic areas. Sidewalks narrower than 6 feet do not support walkability for the level of development allowed.

By scaling sidewalk requirements to the surrounding context and anticipated level of activity, the LUCA ensures a thoughtful, adaptable public realm that supports a vibrant, accessible Wilburton district.

#### 2.4. Will sidewalks be allowed to accommodate private outdoor dining uses?

# Response:

Property owners adjacent to public roadways or sidewalks in the Wilburton TOD (Local Streets) may be eligible to apply for a Sidewalk Café. For outdoor dining areas located in the public right-of-way, applicants must obtain a Right-of-Way Use permit from the Transportation

Department. This permit ensures the proposed use complies with the Americans with Disabilities Act and other applicable requirements.

Each Sidewalk Café proposal is reviewed on a site-specific basis and may be approved or denied accordingly. The Transportation Department does not evaluate or permit Sidewalk Café proposals on privately owned streets or sidewalks (such as Flexible Access routes or Commercial Driveways).

If a project wishes to provide outdoor dining, it could also consider locating this on private property or set back from the sidewalk, to ensure there is sufficient space for both pedestrian access and the dining use without impacting the public realm.

# Section 3: Affordable housing and catalyst programs

3.1. How will the affordable homeownership option operate, and how does it compare to other areas of the city?

### Response:

The LUCA provides an option for affordable homeownership by requiring a share of ownership units to be sold at below-market prices to income-eligible buyers, typically earning around 80%-100% of the Area Median Income (AMI) or less.

Key features:

- Income eligibility: Buyers must meet AMI limits and occupy the home as their primary residence.
- Resale restrictions: Homes are bound by a recorded covenant limiting resale prices to preserve long-term affordability.
- Equity building: Owners build equity through mortgage payments and are allowed limited appreciation.
- Resale process: Sellers must notify ARCH, which helps find a new eligible buyer.
- Backup options: If no eligible buyer is found within a set time (typically 90–120 days), alternative solutions may be considered—but preserving affordability remains the priority.

This structure is consistent with how affordable homeownership programs operate citywide, ensuring a balance between owner equity and long-term housing affordability.

3.2. When will the residential and commercial catalyst programs expire?

# Response:

The residential and commercial catalyst programs are temporary incentives to encourage early development. They offer reduced affordable housing requirements and fee reductions for a limited number of projects, with specific expiration dates tied to either unit thresholds, commercial square footage, or fixed deadlines—whichever occurs later.

Residential Catalyst Program:

• Affordability Phase-In:

- 5% affordable housing set-aside for the first 500 units proposed under a complete land use application (no permit issuance required), or until June 1, 2026, whichever is later.
- After that, the full 10% set-aside requirement applies.
- Fee Reductions:
  - 25% fee reduction for the first 500 units proposed under a complete land use application, or until June 1, 2026, whichever is later.
  - A maximum of 1,000 units may vest to the 25% fee reduction.
  - Full fees apply after 500 units are proposed.
  - The fee will not adjust for CPI inflation until after an additional 750 units are proposed, or June 1, 2027, whichever is later.

Commercial Catalyst Program:

- Fee Reductions:
  - 25% fee reduction for the first 600,000 square feet of commercial development proposed under a complete land use application, or until June 1, 2026, whichever is later.
  - A maximum of 600,000 square feet may vest to the 25% fee reduction.
  - Full fees apply after 600,000 square feet are proposed.
  - The fee will not adjust for CPI inflation until after an additional 850,000 square feet are proposed, or June 1, 2027, whichever is later.
  - Medical Office and Life Science: A 50% fee reduction applies to life science or medical office uses until June 1, 2028.

# 3.3. Could you clarify how the MFTE program works when combined with land use code incentives, including the current affordability requirements and how often this approach has been used?

Only a small number of projects have combined the MFTE program with land use code incentives. When these separate affordability incentives are stacked, the affordability requirements change for the overlapping units. Specifically, for any overlapping units, the required Area Median Income (AMI) level must be reduced by 15% compared to the standard requirement under either program alone. This deeper affordability requirement has been in effect since July 2021 and applies to all areas of the city where MFTE and LUC incentives can be used.

To date, two out of the six projects that have received final MFTE certificates have stacked a LUC incentive with the MFTE incentive. Together, these two projects include 113 MFTE units, of which 78 also qualify under land use code incentives. Of those, 54 units are subject to the deeper affordability requirement due to the program stacking - one Downtown project combined

both the LUC incentive and MFTE incentive prior to the July 2021 MFTE code change and is therefore not subject to the 15% AMI reduction.

Currently, we are not aware of any upcoming projects in the development pipeline planning to use this combination.