

**Nesse, Katherine**

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**From:** Council Inquiry <council-inquiry@bellevuewa.gov>  
**Sent:** Wednesday, May 7, 2025 2:19 PM  
**To:** waterdog\_fk@outlook.com  
**Cc:** PlanningCommission; info@newporthillscommunityclub.org  
**Subject:** Re: Protest of recent city actions - [#7015]

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Mr. Klein,

Thank you for your email regarding the proposed Wu short plat, 22-103202 LN. You are now a party of record for this development proposal and as such, you will receive a copy of the Director's decision on this proposal upon its issuance. I will let you know that the Director's decision that was issued on April 17, 2025, has been formally withdrawn. The Notice of Withdrawal was publicly noticed within our Weekly Permit Bulletin (WPB) as noted below:

*The basis for the withdrawal of the approval is insufficient notice of decision under LUC 20.35.235, and incomplete analysis supporting the notice of decision. The Department will correct the insufficiencies identified in this Notice of Withdrawal, revise the staff report supporting the notice of decision, and reissue the Director's Process II Land Use decision pursuant to the requirements set forth in LUC 20.35.235 at a later date. See link to the WPB: [Weekly Permit Bulletin](#)*

Public comments may be accepted on this proposal up until the issuance of the Director's decision. Please note that with any development review application that the applicant bears the burden to submit a code compliant project for city review that conforms to all of applicable Bellevue codes and standards along with the decision criteria of LUC 20.45B.130.A which may be found here: [Ch. 20.45B Short Plats and Short Subdivisions | Bellevue Land Use Code](#).

Lastly, if you have further comments on this project, you may send them to Leticia Wallgren, the Housing and Special Projects Planning Manager, and they will be compiled with the project file for consideration. She may be reached at [lwallgren@bellevuewa.gov](mailto:lwallgren@bellevuewa.gov).

I hope the above is helpful to you.

Regards,

**Toni Pratt**  
**Land Use Director**  
**City of Bellevue - Development Services Department**  
**425.452.5374**  
[tpratt@bellevuewa.gov](mailto:tpratt@bellevuewa.gov)

*The City of Bellevue is now implementing SB 5290 measures for all Land Use Permits. For more information on these measures, refer to our webpage here: [Permit Streamlining Land Use Code Amendment | City of Bellevue](#) For information on our revised land use submittal requirements, refer to our webpage here: [Land Use Permits | City of Bellevue](#). Please note that SB 5290 measures only apply to Land Use permits, not construction permitting. For questions, please reach out to a Land Use Planner.*

On Fri, 25 Apr at 1:55 PM , Frank Klein <waterdog\_fk@outlook.com> wrote:

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Planning Commision and City Council members,

I write to you to share some concerns about recent decisions made through the planning commission process and recent actions taken by the City Council.

My name is Frank Klein and I live in the Newport Hills Community. My spouse and I are both retired Realtors. I sold real estate for 43 years and my spouse 17 years after working for the Bellevue school district for many years. We know the land, the buyer's desires, the seller's anxiety, the financials, the homes, family budget and the bundle of rights that go with owning a home.

Thoughtful consideration for the people living here now as well as the future is lacking with the approval of the Wu short plat of Newport Hills. This is going to change the character, look and livability of the neighborhood. Allowing properties in the classic community to be divided into additional housing has not been given the consideration deserving for the people living here or the people who will live here in the future.

Let me share livability issues as seen from the eyes of the people living here and people to live here in the future.

The land is an elevated flat plateau with limited access points from I-405 and Coal Creek Parkway which are located surrounding the plateau at lower elevations. If you drove around the area and did not know Newport Hills was here, you would never be aware of the Newport Hills area. The privacy and isolation due to topography is huge with buyers. It feels safe and it has been safe.

The ground itself is generally glacial till. The till contains various levels of clay keeping the ground from absorbing all the runoff produced by the rainfall. Thus, it is challenging to discharge roof water into each individual building site. Recently some homes have been torn down and replaced by much larger homes with impermeable surfaces as much 100% more than the original home torn down. It has been reported to me this has raised the water table at the new larger home and caused water issues with the neighboring homes.

The median income of households in the area is around \$120,000 per year. The new homes in the area are not being built to an affordable price target that matches the income of buyers. The homes being built to replace the original homes are also not being built to the desire of most buyers. It is well known the market for a home diminishes fast when the square footage of heated living space surpasses 3000 Square feet. The area as it was built has a mix of various sizing in homes. This is not happening in the new replacement construction. Most consumers of these large homes did not really set out to buy them. They buy them because of where they are and they can afford them, not because they wanted them. They also tend to not stay in them very long.

Take a closer look into the future with these large homes being built. We have been fortunate to not have had a wildfire in the area. We do have all the elements however and climate changes would indicate we will eventually have them. These large homes create wind tunnels that fan the flames of wildfires. We are all facing a period of lowering snow fall also and being asked to conserve water. I do not see water conservation being built into the new housing or the landscaping. We are all being asked to reduce our carbon footprint. Yet, we allow a home to be torn down that has carbon contained and replace it with another larger home that consumes more trees. Puget Sound Energy is constantly encouraging us to use less electricity and to move away from the use of natural gas. How is building a home larger than needed or wanted going to accomplish or encourage conservation?

Why does the builder/developer build such large homes?

There is a market for large housing. The market is not really large, and it is not very constant. For the builder/developer it represents more profit per home built, but only if the market is willing, it gets built on time, the marketing costs do not get elongated, and the holding charges do not go on for months and sometimes more than a year. It is risky and motivated by the chance of more profit.

There is a formula for compromise that does allow more flexibility for replacing the original home on a single residential lot. Take the heated square footage of the homes on either side of the home to be replaced or remodeled. Add the square footages together, divide by two, and mutiple by 1.2%. You get a bigger home that still has a size relative to the original community and infrastructures. The formula restricts the profit that can be made, but is respectable income for the builder, developer or owner. With the formula, the incentive of profit is diminished, and high risk is not taken. There will always be the individual that will still want to go huge with no care to cost, but it is the exception instead of the standard.

There is also the issue of the protective covenants recorded on the title of most all homes in the Newport Hills area. The typical homeowner does not understand the implications of the covenants. I know governmental bodies as well as builder/Developers leverage the lack of knowledge the homeowner has relative to the homeowner's rights and what those rights can mean to the homeowner. It is only fair to allow more response time from the community to put together a unified reaction to the governmental takings you are taking. I use these strong words because it is exactly what you did, and the optics are not good for the position of the City going into a holiday weekend and a short response time for any opposition on an issue the community is largely not aware of. Some early polling of people around the property early on indicated very strong opposition. This was shared with and the City went forward anyway. You are aware strong opposition exists and you tried to catch the community off guard.

You need not fear doing better,

Frank Klein  
Retired Realtor  
Newport Hills Resident

*Frank Klein*



Nesse, Katherine

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**From:** Shuchi Hsu <SH@cresthholdings.com>  
**Sent:** Friday, May 9, 2025 11:08 AM  
**To:** PlanningCommission  
**Cc:** Jessica Clawson; Skye Bredberg  
**Subject:** 5/14 Planning Commission Study Session Comments  
**Attachments:** 05.09 25 Letter to Planning Commission.pdf

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

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**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

**Subject:** Request for Flexibility on Height and Floor Plate Restrictions to Maximize Affordable Housing Incentives in Housing Opportunities in Mixed-Use Areas (HOMA)

Dear Bellevue Planning Commission and Staff,

We are currently developing a project at **929 109th Ave NE** in Downtown Bellevue. As the code stands today, our project can achieve a **5.8 FAR**, comprised of 4.5 Base FAR, 0.5 FAR amenity incentive, and 0.8 FAR affordable housing incentive—yielding approximately 12 affordable units.

Under the proposed update, the affordable housing incentive could increase to **2.25 FAR**, or 50% of the base FAR. We would utilize this expanded incentive, however, because the City is creating a new affordable housing requirement without providing additional development capacity, we cannot. Specifically, the current **height restrictions (230'/250') in the DT-R zone** and **maximum floor plate limits**, render the project unable to utilize the additional FAR. As a result, our project remains capped at the original 5.8 FAR, and the full benefit of the incentive cannot be realized.

If reasonable flexibility were granted to either **height or floor plate restrictions**, the project could accommodate the full 7.25 FAR. This additional 1.45 FAR could result in **22 more affordable housing units**, significantly contributing to Bellevue's housing goals—especially for working families who are increasingly priced out of the urban core.

We respectfully ask the Planning Commission to consider **relaxing the height and/or floor plate limitations** in the DT-R zone for projects that are delivering meaningful affordable housing. Doing so would unlock the true potential of the code update and advance our shared commitment to housing equity in Bellevue.

Thank you for your consideration, and we welcome the opportunity to discuss further.

Sincerely,

Shuchi Hsu

*On behalf of Crescent Capital Partners, Developer of 929 109th Ave NE, Bellevue*

To: Bellevue Planning Commission

**Subject:** Request for Flexibility on Height and Floor Plate Restrictions to Maximize Affordable Housing Incentives in Housing Opportunities in Mixed-Use Areas (HOMA)

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Thank you for your consideration, and we welcome the opportunity to discuss further.

Sincerely,



Shuchi Hsu

*On behalf of Crescent Capital Partners, Developer of 929 109th Ave NE, Bellevue*

## Nesse, Katherine

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**From:** Jack McCullough <jack@mhseattle.com>  
**Sent:** Friday, May 9, 2025 1:43 PM  
**To:** PlanningCommission  
**Cc:** Carlson, Diane (she/her); Horner, Rebecca D  
**Subject:** Downtown Affordable Housing Requirements  
**Attachments:** Letter to PC re Affordable Housing Fee (5-9-25).pdf

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

You don't often get email from jack@mhseattle.com. [Learn why this is important](#)

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Commissioners:

Please see the attached letter relating to an item on your forthcoming agenda.

Thank you.

Jack

John C. McCullough  
Attorney at Law

**McCULLOUGH HILL PLLC**

701 Fifth Avenue, Suite 6600  
Seattle, Washington 98104  
Tel: 206.812.3388  
Cell: 206-612-9101  
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[www.mhseattle.com](http://www.mhseattle.com)

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# McCULLOUGH HILL PLLC

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May 9, 2025

VIA ELECTRONIC MAIL

Craighton Goepple, Chair  
Planning Commission  
City of Bellevue  
450 110<sup>th</sup> Avenue NE  
Bellevue, Washington 98004

Re: Proposed Downtown Affordable Housing Fee

Dear Chair Goepple and Commission Members:

The last 15 years have seen an unprecedented degree of growth and development in downtown Bellevue and the current project pipeline suggests that much more is yet to come. In large part, this has been the result of the City's careful efforts to position itself as being open to new development. But as we know from prior down cycles, the maintenance of such success is always a fragile thing.

So we were stunned to learn in the last two weeks that the City is considering the adoption of a \$52/sf affordable housing fee on all new development downtown, without granting any additional development capacity. This fee would apply to 25% of square footage above the base FAR, and/or would require the first 25% of amenity incentive points to be provided as affordable housing at 80% AMI. We have communicated this new program to our many clients and they have all said one thing: they would have hoped to have heard about this directly from the City, through some thoughtful outreach process to property owners and developers downtown. Sadly, they have only learned about it second-hand, from our outreach and from other colleagues. They have expressed to us their great surprise, thinking that the City would be solicitous about first reaching out to the people expected to pay this tax. This outreach never occurred.

But the more important question is: how can the City be seriously considering this tax? Aside from the utter lack of outreach to owners downtown, interest rates and construction costs have increased exponentially in the last several years, the credit markets for financing are in lock-up and the overall economic climate is fraught with uncertainty. The addition of this \$52/sf fee on new development would instantly jeopardize the viability of all proposed downtown projects.

Historically, the City has been careful in the adoption of affordable housing fees like this. The City has engaged in substantial outreach with all affected parties. For Bel-Red, Downtown, Eastgate and Wilburton, the City undertook a thorough nexus study to identify the housing need, the market

conditions, and the appropriate fee exaction based on legal and constitutional guidance. Affected parties were engaged in this process and had an opportunity to respond to preliminary recommendations. Above all, completing a nexus study in advance is necessary to defend the legal validity of the fee.

This process has worked well for Bellevue in the past, but as far as we can tell, none of these steps has been taken here. Owners received no outreach, we are not aware of any nexus study prepared for this downtown initiative and owners have not been engaged to review the recommendations prior to presentation to the Planning Commission. Outreach to one Chamber committee is no substitute for personal contact, particularly when the City has the contact information for all of the property owners and developers in downtown. We would be surprised if the City of Bellevue now intends to short-circuit its long-standing practice in the way it develops these kinds of regulations.

We encourage the Planning Commission to recommend the following steps:

- Ask City staff to prepare a needs analysis for affordable housing specifically in downtown.
- Based on this, ask City staff to prepare a nexus study for downtown affordability requirements, as the City has in all prior cases. Since there is no additional development capacity being granted, it is unclear how there can be adequate nexus.
- Ask City staff to prepare an economic feasibility study, as the City has done in all prior cases. It should outline the economic impact of the new fee/requirements on developments downtown based on current economic conditions. Ideal economic conditions in some mythical future cannot be used to justify this current program.
- Call for a thoroughgoing outreach process to all affected parties downtown. Solicit stakeholder input as part of preparation of the studies, in a robust way.
- Convene a working group of key parties to assist in the process of developing a recommended strategy. Downtown property owners and developers were not meaningfully involved in the preparation of these new requirements.

Development in downtown Bellevue has been a bright spot in the region in recent years, but there is a way to stop it, and this is it.

We appreciate your attention to these comments.

Sincerely,



John C. McCullough

cc: Bellevue City Council  
Diane Carlson  
Rebecca Horner

## Nesse, Katherine

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**From:** Jodie Alberts <jodie@bellevuechamber.org>  
**Sent:** Sunday, May 11, 2025 2:22 PM  
**To:** PlanningCommission  
**Cc:** Jessica Clawson; Joe Fain  
**Subject:** PLUSH HOMA Comments  
**Attachments:** PLUSH HOMA Letter\_05.11.2025.pdf

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

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Chair Goepple and Commissioners,

Thank you for the opportunity to comment on the draft Housing Opportunities in Mixed Use Areas (HOMA) LUCA. Please find the attached comments from the Chamber's PLUSH Committee regarding feedback and recommendations.

If you have any questions regarding our input, please don't hesitate to contact me.

Thank you,  
Jodie

Jodie Alberts | Vice President of Government Affairs

**Bellevue Chamber of Commerce**

M: 901.834.4261 | O: 425.213.1206 | E: [jodie@bellevuechamber.org](mailto:jodie@bellevuechamber.org)

330 112<sup>th</sup> Ave. NE, Suite 100, Bellevue, WA 98004



## PLUSH COMMITTEE

Permitting, Land Use, Sustainability, & Housing

[bellevuechamber.org](http://bellevuechamber.org)

425-454-2464

[staff@bellevuechamber.org](mailto:staff@bellevuechamber.org)



May 11, 2025

Planning Commission  
City of Bellevue  
P.O. Box 90012  
Bellevue, WA 98009

### **RE: Concerns Regarding HOMA Draft – Proportionality, Feasibility, and Consistency Issues**

Dear Chair Goepppele and Commissioners,

Thank you for your continued work on the Housing and Opportunity Market Affordability (HOMA) initiative. The Bellevue Chamber PLUSH Committee remains committed to increasing housing production and affordability, but we are concerned that the current HOMA draft may unintentionally hinder those goals.

The draft raises several legal, economic, and implementation issues that warrant further study and calibration. We respectfully submit the following concerns for your consideration:

#### **1. Lack of Proportionality and Legal Risk**

In Downtown, the draft imposes a new \$52/s.f. fee on development above base height or FAR, converting what was a voluntary incentive into a mandatory requirement—without adding any development capacity. This exceeds Council’s directive to “make the IOC permanent” and, in some cases, would result in less affordable housing than the current IOC.

In other areas, affordability mandates have been lifted directly from Wilburton’s first draft without adjustments to ensure legal nexus or proportionality.

We urge the Commission to:

- Remove Downtown provisions that exceed Council’s IOC directive.
- Complete a valid economic analysis that shows the impacts of these proposed affordability requirements. The August 2024 study—based on Wilburton inputs—is outdated and legally insufficient. If new taxes make projects infeasible, we ask that they not be imposed during a housing crisis.

Without clear legal and economic justification, the City risks adopting policies that are not legally viable and that may also discourage the very development HOMA seeks to promote.



## 2. Inconsistency Across Zones

While some zones (e.g., Wilburton) benefit from incentives like a 4:1 FAR bonus, Downtown's incentives have been narrowed, creating confusion and concerns regarding equitable application. In Downtown, for example, the 4:1 FAR bonus now only applies to projects maximizing amenity points.

Unlike Wilburton, HOMA was not informed by developer-provided feasibility modeling or calibration data. Imposing uniform affordability mandates across highly varied geographies without economic validation is inappropriate and risks production.

## 3. Feasibility for All Site Types

HOMA's rigid requirements pose challenges for both small and large sites:

- **Small sites** may not pencil under fixed affordability rules, especially without tiered options or flexibility in delivery (such as in-lieu fees or blended performance). This concern is echoed in other recent feedback from the development community, including the WBPA.
- **Larger or low-density sites** face added barriers from added constraints, including pervious surface rules and the removal of FAR exemptions, which could stifle townhome or middle housing development.

A more flexible framework—one that allows mixing rental and ownership metrics—is needed to accommodate diverse site constraints.

## 4. Parking Requirements and State Law

Recent state legislation has altered local authority on parking mandates. HOMA should be updated to reflect these changes to avoid layering additional requirements onto developments already facing affordability mandates and new height and density standards.

## 5. Communication and Implementation Gaps

There has been significant confusion among stakeholders over how HOMA interacts with the Interim Official Control (IOC), particularly for projects expecting incentives like FAR exemptions to remain.

HOMA rollout efforts have not been accompanied by adequate outreach and guidance. For example, projects that are unvested and would be subject to these changes have not been given notice about what requirements are on the horizon that would apply to their pipeline projects. A zone-by-zone matrix outlining what is changing, what is being removed, and what is being added would improve transparency. Additionally, we ask that any unvested projects receive direct notice of these changes and a clear path to vesting.

## 6. Failure to Properly Implement the Downtown IOC

The IOC successfully encouraged affordable housing in Downtown by offering:

- A 1:4 market-to-affordable FAR bonus (up from 1:2.5), plus a 1.0 FAR exemption for affordable housing
- Reduced parking minimums
- FAR transfers in DT-MU zones with overlay constraints

- Flexibility on height, floorplate, and lot coverage for projects offering at least 0.5 FAR of affordable housing

Six Downtown projects used the IOC despite unfavorable market conditions. Yet the HOMA draft deviates substantially:

- It introduces a \$52/s.f. tax and mandatory affordability without added development capacity—a legally questionable shift.
- It limits the 4:1 bonus to projects maximizing amenity incentives, penalizing mid-rise projects.
- Language regarding stepbacks and floorplates is contradictory—at times requiring affordable housing, at others not.

## Recommendations

To ensure HOMA supports Bellevue’s housing goals, we urge the City to:

- Conduct the legally required proportionality and nexus studies to justify affordability mandates
- Analyze economic feasibility across zones and product types
- Reinstate consistent incentives—e.g., the 4:1 bonus—for affordability across zones
- Provide flexibility in how affordability requirements can be met, especially for small or irregular parcels
- Align parking requirements with updated state law
- Publish a clear, zone-specific summary of proposed HOMA changes and impacts
- Notify developers with projects in the pipeline to inform of new potential requirements and offer streamlined vesting process
- Ensure MFTE eligibility aligns with new mandates without stricter AMI requirements
- Follow Council’s directive to implement the Downtown IOC as-is

We appreciate the Commission’s thoughtful stewardship and the continued efforts of City staff to address Bellevue’s housing challenges. Your work is critical to shaping policies that will have a lasting impact on our city’s future. The Bellevue Chamber and our members remain committed partners in this effort and stand ready to support a path forward that is practical, proportional, and effective in advancing housing affordability and supply.

Sincerely,



Jodie Alberts  
Vice President, Government Affairs



Jessica Clawson  
PLUSH Committee Chair

## Nesse, Katherine

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**From:** Luke Schroeder <lschroeder@schnitzerwest.com>  
**Sent:** Monday, May 12, 2025 9:35 AM  
**To:** Goeppeler, Craighton; Ferris, Carolyn; avillaveces@bellevuewa.gov; Khanloo, Negin; Lu, Jonny; PlanningCommission  
**Cc:** Pam Hirsch; Zeb Keck; Jack McCullough; Jessica Clawson  
**Subject:** City of Bellevue - Proposed HOMA Impacts

**Follow Up Flag:** Follow up  
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Chair Goeppeler and Commissioners:

My name is Luke Schroeder, and I am with Schnitzer West. We are proud to have partnered with the City in our long history and have built several million square feet of office space in downtown Bellevue. Schnitzer West believes in Bellevue. We are the developers of the proposed Arcadian development, located at 120 106<sup>th</sup> Avenue NE. This project is an 18-story mixed use tower and it has been in development review with the City of Bellevue since 2022. The following is a picture of the proposed development:



We were very surprised to learn, not from City staff, but instead from our land use attorneys, of the pending HOMA changes to downtown. We are not sure why no one contacted us about this potentially very impactful change. Our project would be subject to these changes as an unvested project and would impose a \$52/square foot fee to offset affordable housing impacts. We are advocates for affordable housing, but would suggest a forum at the very least discuss mutually beneficial solutions that offset the fee.

To say that we are concerned about this new code would be an understatement. We are strong believers in the office market and are committed to navigating the present head winds, but levying a tax at a time like this and in the manner it has been proposed threatens any potential for new development. We do not understand why the City would be considering such a tax right now particularly when no offsetting incentive is contemplated and no additional floor area is being provided. The tax will not result in additional monies for affordable housing—instead it will result in no development, and the City will bear the opportunity cost of various tax revenue streams (property, construction sales, B&O, etc). In addition to the economic impact, this proposal will sully the pro-development sentiment that Bellevue has fostered and the employers that have chosen this City will take notice considering they share in the potential cost associated with this tax.

We are happy to discuss our concerns with any of you, at any time. Please direct staff to take out this new tax on development.

Thank you for hearing our concerns.



**Luke Schroeder | Investment & Development**  
**Senior Investment & Development Manager**

Schnitzer West, LLC  
920 Fifth Avenue Suite 2750, Seattle, WA 98104  
(M) 602.980.3354 | (O) 206.626.3700 | [schnitzerwest.com](http://schnitzerwest.com)

## Nesse, Katherine

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**From:** Brady Nordstrom <brady@housingconsortium.org>  
**Sent:** Monday, May 12, 2025 8:48 PM  
**To:** PlanningCommission  
**Cc:** Patience Malaba; Chris Buchanan; Jesse Simpson; Khanloo, Negin; Lu, Jonny; Goepppele, Craighton; Villaveces, Andres; Ferris, Carolynn  
**Subject:** EAHC and HDC Comment on HOMA, 5-14-2025  
**Attachments:** EAHC\_BellevueHOMA\_5-14-2025.pdf

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Dear Bellevue Planning Commission,

Please see the attached letter as comment on Housing Opportunities in Mixed-use Areas ("HOMA") for the 5-14-2025 planning commission meeting. **The Eastside Affordable Housing Coalition and HDC strongly support "Option A" with an affordable housing requirement** in Bellevue's mixed-use areas as the best tool to achieve Bellevue's affordable housing goals alongside robust private market development.

Please see the attached letter for our full comment.

Best Regards,  
Brady Nordstrom

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**Brady Nordstrom** *(he/him)*  
Associate Director of Government Relations and Policy  
[Housing Development Consortium of Seattle-King County](#)  
1326 5<sup>th</sup> Avenue, Suite 230 | Seattle, WA 98101  
C: (253) 886-2099

HDC's 2025 [Affordable Housing Week](#) is May 12-16!  
Check out our schedule of events ([here](#)).



HOUSING  
DEVELOPMENT  
*consortium*



May 14, 2025  
Bellevue Planning Commission  
450 110th Avenue NE  
Bellevue, WA 98004

**Subject: Comment on HOMA for 5/14/2025 Study Session**

Dear Bellevue Planning Commission:

The Eastside Affordable Housing Coalition ("[EAHC](#)") is a group of over 30 local organizations that build, operate, and advocate for affordable housing on the Eastside, including in Bellevue. Together we support policies, programs, and funding that advance the production and preservation of affordable homes while increasing housing access and opportunity. **We are writing to share comment on the Housing Opportunities in Mixed-Use Areas ("HOMA") Land Use Code Amendment ("LUCA"), which is part of the City's "Next Right Work" initiative ([reference](#)). EAHC strongly supports staff efforts to expand housing opportunities in mixed-use areas, particularly the intentional inclusion of affordable housing as a foundational goal of this work.**

We emphasize the importance of the HOMA LUCA in aligning Bellevue's zoning and development regulations with the land use designations approved in the Bellevue 2044 Comprehensive Plan Future Land Use Map ("FLUM"). Even as we prepare to implement the Bellevue Comp Plan vision, it's important to remember that capacity alone is insufficient to meet the full range of Bellevue's Countywide Planning Policies housing targets. Of the total housing needed between 2019 and 2044 (35k units), almost 85% of those units are to be affordable at income levels at or below 80% AMI. **We therefore affirm the critical role of HOMA to expand and accelerate affordable housing production across Bellevue's mixed-use centers.**

EAHC appreciates the City's commitment to this work and offers the following high-level comments on the HOMA LUCA to date:

- The Eastside Affordable Housing Coalition recommends "**Option A**" with a **well-calibrated affordable housing requirement** as the best tool to achieve predictable affordable housing production in Bellevue's mixed-use areas.
  - Value is being provided through these upzones via height and/or FAR increases and other code-based cost reductions. We affirm that this exchange should be carefully calibrated to include some level of public benefit in the form of included affordable housing units or a proportionate level of funding for affordable housing units (fee-in-lieu).
  - **An affordable housing requirement will always produce more affordable housing than an incentive program using the same percentages and income targeting.** Simply put, an incentive is not a reliable way to ensure public benefit as affordable housing through these upzones. This is because an incentive-only option does not apply to units built within the base FAR; only those units built above the base. Thus, an incentive applies the affordable housing percentage to a smaller portion of the building. Alternatively, an affordable housing requirement treats affordable housing as a fundamental community need vs. an "amenity" that is selected by a landowner based on comparable costs.
    - Since an affordable housing requirement can only be implemented at the time of an upzone, **it is critical to get this policy right now so that we can expand access to affordable housing near schools, parks, community services, and transportation hubs.**
- **We urge Commissioners to direct the consideration of deeper AMI levels for the Affordable Housing Requirement while maintaining the 10% set-aside percentage.** Based on an initial pro forma analysis conducted by our coalition partner, we believe that calibrations may be supported as low as 60% AMI at the 10% set aside level. This assumes

Housing Development Consortium  
of Seattle-King County

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)



that MFTE is extended to all mixed-use areas under consideration, which will supplement the windfall of value realized from increased development capacity.

- We continue to support development cost-reductions as a way to support affordability in projects, especially when the City links market-rate development with affordable housing. Unlike Wilburton, however, **mixed-use areas throughout the city already have infrastructure that relieves some cost burden on projects. Also, unlike Wilburton, Bellevue's mixed-use areas are often being upzoned to mid-rise levels, which are considered less costly and less risky than high-rise construction** that requires concrete, steel, and other higher-cost materials.
- **We support the inclusion of a fee-in-lieu for both residential and commercial development in mixed-use areas.** Fee-in-lieu can provide flexibility for projects to contribute to affordable housing when unit performance is not possible. This can also generate resources for Bellevue to support lower-income affordable housing projects in other parts of the city.
  - **We challenge the city to ensure that the fee-in-lieu calibrations balance a mix of unit performance and payment.** This means that fee levels must have some parity with the affordability level of the rent-restricted units.
  - **We believe the staff recommended fee schedule is set too low.** If HOMA ultimately requires a lower AMI level for units compared to Wilburton, then the fee-in-lieu level for HOMA would need to be set higher to achieve parity
    - *Lower unit AMI = less monthly rent compared to market rate units = greater gap in development costs for the affordable units = need for higher fee-in-lieu to close development gap*
- **We oppose the inclusion of a catalyst program in HOMA.** Unlike Wilburton, the areas under consideration in HOMA are already part of established neighborhoods with services and activity. There is no need, then, to catalyze development.
- We agree with other parts of the code that provide permanent updates to Downtown requirements and add affordable housing incentives to community mixed-use design. Specifically:
  - **We support adding “affordable housing” to the Downtown Amenity Incentive System.**

Thank you for considering our comments and for centering affordable housing in your discussion of HOMA. Our coalition will continue to provide technical feedback from our unique lens as affordable housing developers, operators, and service providers. We invite Commissioners and staff to engage with EAHC members as this process moves forward.

Sincerely,  
Eastside Affordable Housing Coalition & HDC



## Nesse, Katherine

---

**From:** Alec Nelson <alec.nelson@beam-reach.com>  
**Sent:** Tuesday, May 13, 2025 6:37 AM  
**To:** PlanningCommission  
**Cc:** jack@mhseattle.com; Jessica Clawson  
**Subject:** Letter on Proposed DT Affordability Requirements  
**Attachments:** Letter to Planning Commission\_KANON\_05.12.2025.pdf

You don't often get email from alec.nelson@beam-reach.com. [Learn why this is important](#)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Chair Goepple and Commissioners:

Please find the attached letter regarding the proposed affordability requirements in downtown.

Thank you,  
Alec

**Alec Nelson**  
Beam Reach  
425.218.6604



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

***Re: Proposed Downtown Affordability Requirements***

Chair Goeppelle and Commissioners:

My name is Alec Nelson and I am a Partner with Beam Reach, the developers of the Kanon office project located at 222 112th Avenue NE. This project includes two 15-story office towers and has been in development review with the City of Bellevue since 2022. The project includes significant public amenities such as public open space, street/sidewalk improvements, and ground floor retail—below is a picture of the project's design:





We were surprised to learn from our land use attorneys – instead of from City staff who have been very engaged in our project reviews – of the proposed HOMA changes to downtown. Our project would be subject to these changes as an unvested project. The current draft of the code includes a \$52/sf fee to offset affordable housing impacts without providing any additional developable area in exchange. Based on the City calculation in the proposed code, this would result in a completely unanticipated \$1.8 million payment to the City of Bellevue with no incentives or bonuses in return.

To say that we are concerned about this new code would be an understatement. The commercial office market is extremely challenging, and levying a tax, without providing any additional incentive or reduction in costs, puts development at risk. We do not understand why the City would be considering such a tax right now. Lost development does not just fail to generate additional monies for affordable housing, it also results in a loss of all other tax revenues that development creates (property tax, B&O tax, construction sales tax, etc.).

Please direct staff to remove this new tax on development.

Thank you for hearing our concerns. We are happy to discuss them with you any of you, at any time.

Sincerely,

Alec Nelson

A handwritten signature in black ink, appearing to read "Alec Nelson", with a long horizontal flourish extending to the right.

## Nesse, Katherine

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**From:** Craig Spiezle <craigsp@agelight.com>  
**Sent:** Tuesday, May 13, 2025 8:40 AM  
**To:** Council  
**Cc:** PlanningCommission; King, Emil A.; onebellevue@googlegroups.com; Carlson, Diane (she/her)  
**Subject:** Proposal To Increase Building Heights

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

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Council members,

Representing a coalition of community members, I am in strong opposition to plans to possibly allow middle housing to increase to four stories tall in all areas of Bellevue. This proposal far exceeds what is required by HB 1110 and will decimate the character of the neighborhoods. This change will forever increase traffic and street parking while decreasing families' privacy and our tree canopy while straining neighborhood utility capacity which were designed to accommodate single family housing at lower densities.

While we support managed growth you were all elected to preserve Bellevue's great neighborhoods and residents. This is the wrong direction. It decreases livability for everyone including potential future residents and negatively impacts current Bellevue homeowners, taxpayers and renters.

Please consider the consequences that will impact the city's future and the livability of our city.

Craig Spiezle  
425-985-1421

## Nesse, Katherine

---

**From:** Vitor Cid <vitor.c.cid@gmail.com>  
**Sent:** Tuesday, May 13, 2025 11:42 AM  
**To:** Council; PlanningCommission  
**Cc:** King, Emil A.; onebellevue@googlegroups.com; Carlson, Diane (she/her)  
**Subject:** Support for OneBellevue Proposal to Increase Building Heights

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

You don't often get email from vitor.c.cid@gmail.com. [Learn why this is important](#)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Council Members,

Representing many community members, I am strongly in support of the plans to allow middle housing to increase to four stories tall across Bellevue.

We need more housing in Bellevue and middle housing is the most gentle way to get there.

I also strongly support it going **further** to allow **light commercial use** in neighborhoods, such as coffee shops and convenience stores. This is a model similar to Seattle and some areas of Vancouver BC, which is incredibly helpful in reducing traffic and increasing convenience.

Please continue pushing our city towards the future. Thank you.

## Nesse, Katherine

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**From:** pamela johnston <pamjjo@msn.com>  
**Sent:** Tuesday, May 13, 2025 11:42 AM  
**To:** Robinson, Lynne; Malakoutian, Mo; Bhargava, Vishal; Lee, Conrad; Nieuwenhuis, Jared; Sumadiwirya, Claire; Hamilton, Dave  
**Cc:** PlanningCommission; Anne Rittenhouse; Barbara Hughes; Betsi Hummer; Chloe Chen; Leslie Geller - Eastgate Association; ljlopezmsl@gmail.com; Nicole Myers; phyllisjwhite@comcast.net; pigpoppy@rocketmail.com; Council  
**Subject:** Keep Middle Housing and ADUs Simple  
**Attachments:** Middle Housihng and ADU - Keep It Simple--FOR BELLEVUE CITY COUNCIL 200513.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Council:

On behalf of the many people who worked on Middle Housing and helped to find a way to make it simpler, please accept the attached document,

We have been saying that we want to do the minimum state requirements. The attachment defines the minimum. The state lists their minimum, but this document shows the simplest options.

Residents will understand that what they can expect for a new house is the same as a middle housing. Both have the same Requirements. We choose not to recommend having 5-plexes, 6-plexes, or cottages. Flexes are bulky. The next door neighbors, it's so easy to make them look gigantic, castle walls changing your house and garden from next door. I know that people are in love with cottages we're not seeing the same thing as the end result. Cottages are very complicated to get right on all possible lots. We need forms that work with the need for variances on all lots. Keep it simple. Anyone wants to add substantial housing, they still have the PUD (Planned Unit Development) experience method to achieve this.

This document is using requirements from Commerce, not the more complex model code. It makes it much simpler and does not leave too much to the imagination. Residents can understand from the variations in housing in the neighborhoods. They can look at and know what to expect. More units just the same building sizes. The same number of trees. The same change they see they would have for any new house next door.

Sincerely,  
Pamela Johnston











# MIDDLE HOUSING AND ADUs:

## Keep It Simple



### Process

#### Overview to derive list of changes

Keep it Simple		Use the state code requirements and make the implementation results understandable to residents.
 means this is part of the process, not about the code		Keeping it means use the minimum from the state code. If not a state requirement, use the current Bellevue Code
<b>Start</b> Using Code requirement as written by Commerce. Strikeout is not applicable to Bellevue or this approach.		
<b>Choices</b> If there is a choice, use the simplest and lowest impact. If a minimum and maximum is listed, use the minimum.		
<b>Minimum</b> No changes beyond the state requirements, unless used to fill out the dependency on state requirement. Treatment of housing is a type of single-family housing.		Code and definitions in this document defined by this Washington state Commerce Department unless otherwise noted. This excludes comments
 means "Use state minimal"		
<b>Incremental Change</b> Track progress for one year. Use experience and data from all stakeholders to update. Pay particular attention to residents in and near the new build.  move to Phase 2		Define primary metrics as ASAP Define secondary metrics incrementally, Not sure metrics as a stakeholder question for metrics. .




## Definitions

The statutory definitions in this section are needed to implement middle housing requirements under state law





Code requirement		Comments
<b>Administrative design review</b> means a development permit process whereby an application is reviewed, approved, or denied by the planning director or the planning director's designee based solely on objective design and development standards without a public pre-decision hearing, unless such review is otherwise required by state or federal law, or the structure is a designated landmark or historic district established under a local preservation ordinance. A city may utilize public meetings, hearings, or voluntary review boards to consider, recommend, or approve requests for variances from locally established design review standards. <a href="#">RCW 36.70A.030 (3)</a>	✓	Middle Housing is not a variance, Permits will be determined by objective criteria. No public meeting or notice required, just like any single family home.
<b>Major transit stop</b> means a stop on a high capacity transportation system funded or expanded under the provisions of chapter 81.104 RCW, commuter rail stops, stops on rail or fixed guideway systems, and stops on bus rapid transit routes, including bus rapid transit routes under construction. <a href="#">RCW 36.70A.030 (25)</a>	✓	Rapid Ride and Light rail
<b>Middle housing</b> means buildings that are compatible in scale, form, and character with single-family houses and contain two or more attached, stacked, or clustered homes including duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, and cottage housing. <a href="#">RCW 36.70A.030 (26)</a>	duplexes, triplexes, fourplexes, townhouses, stacked flats, courtyard apartments.	List only the 6 of 9 for Bellevue. Most simple and flexible choices, Bellevue does not have design review so keep it simple,
<b>Single-family zones</b> means those zones where single-family detached residences are the predominant land use. <a href="#">RCW 36.70A.030 (39)</a>	✓	New Zoning: LL-1, LL-2, SR-1, SR-2, SR-3, SR-4, LDR-1
<b>Courtyard apartments</b> means attached dwelling units arranged on two or three sides of a yard or court. <a href="#">RCW 36.70A.030 (10)</a>	✓	
<b>Stacked flat</b> means dwelling units in a residential building of no more than three stories on a residential zoned lot in which each floor may be separately rented or owned. <a href="#">RCW 36.70A.030 (40)</a>	✓	Note: 30/35 housing height accommodates 3 stories
<b>Townhouses</b> means buildings that contain three or more attached single-family dwelling units that extend from foundation to roof and that have a yard or public way on not less than two sides. <a href="#">RCW 36.70A.030 (41)</a>	✓	Caution that these are not always compatible with every lot.



<b>Cottage housing</b> means residential units on a lot with a common open space that either: (a) Is owned in common; or (b) Has units owned as condominium units with property owned in common and a minimum of 20 percent of the lot size as open space. <a href="#">RCW 36.70A.030 (9)</a>		Most complex housing option. Consider in Phase 2
<b>Plex Definition,</b>  <div> <b>Current Bellevue code</b>   <i>Duplex.</i> See <i>Dwelling, Duplex.</i> (Ord. 4654, 6-6-94, § 79)   <i>Dwelling, Duplex.</i> A building containing two kitchens and designed to be occupied by two families living independently of each other, but not including single-family dwellings with an approved accessory dwelling unit. (Ord. 6746, 7-17-23, § 3; Ord. 4654, 6-6-94, § 79) </div>	Add tri and 4 plex definitions	Plexes not defined in state, code. Duplexes defined in current code Use current code to modify

## Lots zoned predominantly for residential use

Requirements in this table should be applied to all lots zoned predominantly for residential use, and represent the minimum requirements necessary to meet state law

Code requirement	State Code Use the minimum	Comments
<b>For cottage housing,</b> requires a minimum of 20 percent of the lot be common open space.. The common open spaced must be owned in common or has condominium units with property owned in common.		Move to Phase 2
<b>For courtyard apartments,</b> requires at least one yard or court, which must be bordered by attached dwelling units on two or three sides.		
<b>For townhouses,</b> requires at least three attached single family dwelling units that extend from the foundation to roof and have a yard or public way on not less than two sides.		
Allows <b>at minimum</b> the following permitted unit per lot densities: <ul style="list-style-type: none"> <li>(1) Four units per lot,</li> </ul>		


<ul style="list-style-type: none"> <li>• (2) Six units per lot on all lots within one-quarter mile walking distance of a major transit stop,</li> <li>• (3) six units per lot if at least two units on the lot are affordable housing as defined below</li> </ul> <p>Exempts lots below 1,000 square feet after subdivision, unless the city has enacted an allowable lot size below 1,000 square feet in the zone. <a href="#">RCW 36.70A.635(1)(a - c)</a></p>		
<p>For <b>Tier 1 and 2</b> cities, requires units qualifying for affordable housing provisions to meet the following standards, per <a href="#">RCW 36.70A.635(2)</a>:</p> <ul style="list-style-type: none"> <li>• Housing costs do not exceed 30% of the monthly income of a household making at or below 60% of median household income for rental housing, or 80% of median household income for owner-occupied housing for the county where the household is located. Median household income is as reported by the United States Department of Housing and Urban Development. Housing costs include utilities other than telephone. Median household incomes are adjusted for household size.</li> <li>• A covenant or deed restriction ensures that units are maintained as affordable for a term of at least 50 years, consistent with the conditions in chapter 84.14 RCW.</li> <li>• A covenant or deed restriction addresses criteria and policies to maintain public benefit if the property is converted to a use other than affordable housing.</li> <li>• Affordable units are provided in a format comparable to other units in the development, including in range of size, number of bedrooms, functionality, and distribution throughout the development.</li> </ul> <p>* If a city has enacted a program under RCW 36.70A.540, then the terms of that program govern to the extent they vary from the requirements of RCW 36.70A.635(2). However, programs under RCW 36.70A.540 are not to substitute for the Tier 1 and Tier 2 cities' middle housing affordable housing density requirement.</p>	✓	
<p>For Tier 1 and Tier 2 cities, allows at least six of the nine types of middle housing by-right in all zones predominantly for residential use: duplexes, triplexes, fourplexes, fiveplexes, sixplexes, townhouses, stacked flats, courtyard apartments, cottage housing. RCW 36.70A.635(5)</p>	6 minimum	duplexes, triplexes, fourplexes, townhouses, stacked flats, courtyard apartments
<p>Allows zero lot line short subdivisions where the number of lots created is equal to the required unit density. <a href="#">RCW 36.70A.635(5)</a></p>	✓	

Reviews compliance with middle housing design standards using an administrative design review process. <a href="#">RCW 36.70A.635(6)(a)</a>	✓	
Does not require more restrictive development regulations for middle housing than those required for detached single-family residences. <a href="#">RCW 36.70A.635(6)(b)</a>	✓	Middle Housing the same as the zone
Applies the same development permit and environmental review processes to middle housing as those applied to detached single-family residences, unless otherwise required by state law. <a href="#">RCW 36.70A.635(6)(c)</a>	✓	
Does not require off-street parking within one-half mile walking distance of a major transit stop. <a href="#">RCW 36.70A.635(6)(d)</a>	✓ + Definition	Define walking distance in application.  Use "Google Map" distance.  In Phase 2, update all code to be the same walking distance definition.
Requires no more than one off-street parking space per unit on lots 6,000 square feet or less, before any zero lot line subdivisions or lot splits. <a href="#">RCW 36.70A.635(6)(e)</a>	✓	
Requires no more than two off-street parking spaces on lots greater than 6,000 square feet before any zero lot line subdivisions or lot splits. <a href="#">RCW 36.70A.635(6)(f)</a>	✓	







## Exemptions

As applicable, local code should specify the following exemptions to middle housing requirements

Code requirement		Changes needed?
<p>Exempts the following areas from the middle housing requirements of <a href="#">RCW 36.70A.635</a>:</p> <ul style="list-style-type: none"> <li>• Portions of a lot, parcel, or tract designated with critical areas designated under <a href="#">RCW 36.70A.170</a> or their buffers as required by <a href="#">RCW 36.70A.170</a>, except for critical aquifer recharge areas where a single-family detached house is an allowed use provided that any requirements to maintain aquifer recharge are met.</li> </ul>	✓	<p>The parts of the lot without issues can be used.</p> <p>Lots can only be split once.</p>

<ul style="list-style-type: none"> <li>• Watersheds serving a reservoir for potable water if that watershed is or was listed, as of July 23, 2023, as impaired or threatened under section 303(d) of the federal clean water act (33 U.S.C. Sec. 1313(d)).</li> <li>• <del>Lots designated as urban separators by countywide planning policies as of July 23, 2023.</del></li> <li>• A lot that was created through the splitting of a single residential lot.</li> <li>• <del>Areas designated as sole-source aquifers by the United States Environmental Protection Agency on islands in the Puget Sound.</del></li> </ul>		
<p>Exempts the following areas from parking standards for middle housing, per <a href="#">RCW 36.70A.635(7)</a>:</p> <ul style="list-style-type: none"> <li>• Portions of the city for which the Department of Commerce has certified a parking study in accordance with <a href="#">RCW 36.70A.635(7)(a)</a>, in which case off-street parking requirements are as provided in the certification from the Department of Commerce.</li> <li>• </li> </ul>		<p>Conduct parking study in Phase 2 determine issues.</p>

Accessory dwelling units (ADU)s		
Code requirements		Comments
a. ADU means a dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, townhome or other housing unit. <a href="#">RCW 36.70A.696(6)</a>	✓	Use
b. Dwelling unit means a residential living unit that provides complete independent living facilities for one or more persons and that includes permanent provisions for living, sleeping, eating, cooking and sanitation. <a href="#">RCW 36.70A.696(1)</a>	✓	Use
c. Allows at least two ADUs on all lots that meet the minimum lot size in zoning districts that allow for single-family homes. <a href="#">RCW 36.70A.681(1)(c)</a>	✓	Use Minimum 2.

<p>d. Allows ADUs in the following configurations and conditions:</p> <ul style="list-style-type: none"> <li>• Two attached ADUs such as unit in a basement, attic, or garage; or</li> <li>• One attached ADU and one detached ADU; or</li> <li>• Two detached ADUs, which may be comprised of either one or two detached structures</li> </ul> <p><del>Exception: cities and counties may impose a limit of two accessory dwelling units, in addition to the principal unit, on a residential lot of 2,000 square feet or less. <a href="#">RCW 36.70A.681(3)</a></del></p>		<p>Code specific to 2000sf lots would be used rarely. Assessor Data shows Bellevue has 167 lots under 2000 sf.in R-1 to R-7.5 zones. Use Lot coverage limits.</p>
<p>e. Allows conversion of an existing structure, such as a detached garage. <a href="#">RCW 36.70A.681(1)(j)</a></p>		
<p>f. Does not allow ADUs in locations where development is restricted under other laws, rules, or ordinances due to physical proximity to on-site sewage system infrastructure, critical areas or other unsuitable physical characteristics of a property. <a href="#">RCW 36.70A.680(4&amp;5)</a> and <a href="#">RCW 36.70A.681</a></p>		
<p>g. Allows a gross floor area of at least 1,000 square feet. <a href="#">RCW 36.70A.681(1)(f)</a></p>		<p>Use minimum 1000 sf In 1949, the typical single-family home was just <a href="#">909 square feet</a>—by 2021, it had shot up to <a href="#">2,480 square feet</a>. 2 ADUs is up to 2000 sf. High Impact on trees. Keep it simple.</p>
<p>h. Roof height limits on an ADU are greater than or equal to 24 feet.  Exception: when the height limitation on the principal unit is less than 24 feet. In this case, a city or county may not require the roof height limitation for an ADU to be less than the height limit for the principal unit. <a href="#">RCW 36.70A.681(1)(g)</a></p>		<p>Use 24" the min</p>
<p>i. Requirements for setbacks, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review are not more restrictive for ADUs than those for principal units. <a href="#">RCW 36.70A.681(1)(h)</a></p>		<p>No change from current</p>

j. Allows detached ADUs to be sited at a lot line if the lot line abuts a public alley. Exception: if the city or county routinely plows snow on the public alley. <a href="#">RCW 36.70A.681(1)(i)</a>	✓	Few alleys exist
k. <del>[WITHIN UGAs]</del> Does not require owner occupancy, unless used for short term rentals. <a href="#">RCW 36.70A.680(5)(a)</a>  <i>Note: <a href="#">RCW 36.70A.696(9)</a> defines owner as any person who has at least 50% ownership in a property on which an ADU is located.</i>	✓	
l. Allows sale by condominium. <a href="#">RCW 36.70A.681(1)(k)</a>	✓	
m. Parking limits:  Does not require off street parking within one-half mile of a major transit stop. <a href="#">RCW 36.70A.681(2)(a)(i)</a>  Exceptions: <ul style="list-style-type: none"> <li>• If an empirical parking study showing that meeting these requirements would be significantly less safe to pedestrians, drivers etc. is certified by Commerce. <a href="#">RCW 36.70A.681(2)(b)(i)</a></li> <li>• <del>Areas within a one-mile radius of Seattle-Tacoma International Airport.</del> <a href="#">RCW 36.70A.681(2)(b)(ii)</a></li> </ul>	✓  ▶▶	same note as definition of walking distance for middle housing
n. Parking based on lot size:  Does not require more than one off-street parking space per ADU on lots equal to or smaller than 6,000 square feet before any zero lot line subdivisions or lot splits. <a href="#">RCW 36.70A.681(2)(a)(ii)</a>  o. Does not require more than two off-street parking spaces per ADU on lots greater than 6,000 square feet before any zero lot line subdivisions or lot splits. <a href="#">RCW 36.70A.681(2)(a)(iii)</a>  Exceptions: <ul style="list-style-type: none"> <li>• If an empirical parking study showing that meeting these requirements would be significantly less safe to pedestrians, drivers etc. is certified by Commerce. <a href="#">RCW 36.70A.681(2)(b)(i)</a></li> </ul>	✓          ▶▶	conduct parking study as part of Phase 2

<ul style="list-style-type: none"> <li>Areas within a one-mile radius of Seattle-Tacoma International Airport. <a href="#">RCW 36.70A.681(2)(b)(ii)</a></li> </ul>		
<p>p. Impact fees on the construction of accessory dwelling units are less than or equal to 50 percent of the impact fees that would be imposed on the principal unit. <a href="#">RCW 36.70A.681(1)(a)</a></p>	✓	

++

Other		
Zoning Names and Abbreviation	Needs Input	It's low impact for changes , but but highly impacted for development services process
ADU terms	▶▶	ADU is an ubiquitous term. It gets confusing in discussions since there is not term for "attached accessory dwelling unit"  Consider a term for attached adu.
	▶▶	Create better mechanisms for code compliance
Allow co-living where 6 units per lot are allowed ( <a href="#">RCW 36.70A.535</a> , <a href="#">HB 1998 (2024)</a> )	▶▶	Update in Co-living project and Phase 2

## Nesse, Katherine

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**From:** phyllisjwhite@comcast.net  
**Sent:** Tuesday, May 13, 2025 2:01 PM  
**To:** Robinson, Lynne; Malakoutian, Mo; Bhargava, Vishal; Lee, Conrad; Nieuwenhuis, Jared; Sumadiwirya, Claire; Hamilton, Dave  
**Cc:** PlanningCommission; Anne Rittenhouse; Barbara Hughes; Betsi Hummer; Chloe Chen; Leslie Geller; Loretta Lopez; Nicole Myers; Tim Hays; Linda Ulrich; Carol Kinsman; Tammy Miller; Cheryl Wang; Sachin Lande; John Wu  
**Subject:** Adopt Legislative Minimum Required for Bellevue's Middle Housing LUCA  
**Attachments:** Public Comment for Planning Commission 5-13-25.docx; WDFW Bellevue Wilburton Plan Comments.pdf

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Council:

Thank you for your time and attention. Please consider our requests for the minimum housing density required. Bellevue is doing a tremendous amount of growth at this time. I hope you will continue to uphold Bellevue's quality of life and ensure meaningful engagement with residents and the broader community.

Please see my attached public comments.

Best regards,

Phyllis White



Please include me as a party of record.

Dear Mayor Robinson, Deputy Mayor Malakoutian, and Councilmembers Bhargava, Hamilton, Lee, Nieuwenhuis, and Sumadiwiria,

Thank you for your continued efforts to plan responsibly for Bellevue's future. I write today to express deep concern about the proposed Middle Housing LUCA and its potential impacts on our city's most sensitive natural areas.

Bellevue is already home to significant regional growth areas like the Spring District, BelRed, and East Main. These centers are specifically designed for higher-density, transit-oriented development and have the infrastructure in place to support growth. **We urge the City to adopt only the minimum housing density requirements under HB 1110 and HB 1337—not more.** The growth we are required to accommodate and much of it can be absorbed by those areas that were planned for it.

I request that Bellevue preserves our trees and natural wildlife riparian corridors. We feel so fortunate to live in one of the areas where we can enjoy a bald eagles, blue herons, hawks, bats, owls, and the wildlife living in our trees nearby. We are home to the Kelsey Creek Watershed, Goff Creek, and an interconnected system of riparian corridors, wetlands, and mature forest habitat. These systems are fragile. The water quality in Kelsey Creek already scores as "Moderate" with "Poor" oxygen levels, and stormwater runoff from increasing impervious surfaces continues to degrade fish habitat. The trees, marshlands, and wildlife that remain—including bald eagles, salmon, herons, owls, and even bobcats—depend on healthy vegetation and stream flow to survive.

The LUCA should not weaken the protections these ecosystems rely on.

Specifically, we ask that you:

- **Retain front, rear, and side setbacks** for all middle housing projects.
- **Maintain height limits** that reflect the character of existing neighborhoods.
- **Preserve caps on impervious surfaces** to prevent further runoff and water degradation.
- **Protect significant and landmark trees**, and ensure tree canopy goals are applied equitably across all neighborhoods—not just concentrated in parks.

We also ask that you **count ADUs and DADUs within the six-unit cap** per lot, as intended. Allowing more than six units by excluding these accessory dwellings as middle housing creates a loophole that could triple density in areas without the infrastructure to support it.

Bellevue residents consistently rank **tree protection** above new housing in City surveys. Tree canopy is not just aesthetic—it's critical for cooling, filtering air and water, managing stormwater, and supporting biodiversity. When mature native trees are lost, the ecosystems beneath them collapse. Replacing them with saplings cannot replicate what was destroyed.

We're not against housing. We support smart, thoughtful, **infrastructure-aligned growth**. Please uphold environmental safeguards and allow neighborhoods like Wilburton—rich in habitat and watershed value—to remain low-density. Let's plan carefully to safeguard our environment which will not survive without thoughtful planning.

Attached are the Washington Department of Fish and Wildlife's recommendations. Many of our 176-foot-tall trees have root systems that extend as far as their height. Disturbing or reducing the surrounding buffer zones can damage these roots and ultimately lead to the trees' decline or death.

Here are a few photos of wildlife and landmark trees in our cul-de-sac and neighboring streets. The majority of the trees in our subarea are significant and landmark trees.



**Red-tailed Hawk on neighbor's roof in Wilburton**



**Another Hawk on neighbor's Tree.**



**Great Blue Heron, a Priority Species.**



**Bobcat on Neighbor's Fence**



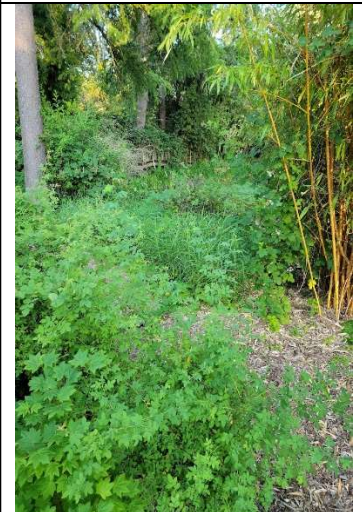
**A Bald Eagle flying over neighbor's roof.**



**Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.**



**Kelsey Creek in our neighbor's yard was unusually dirty last summer.**



**Marsh land under a bridge in a neighboring street on 132<sup>nd</sup>.**

**These are areas designated for R-Suburban, with single-family, duplexes, and cottage housing. Areas with marshland and streams surrounded by century old tree canopies should remain low density housing and with less impervious surfaces.**





**Tall Firs in Wilburton across of Bel-Red. Homes surrounded by landmark trees.**



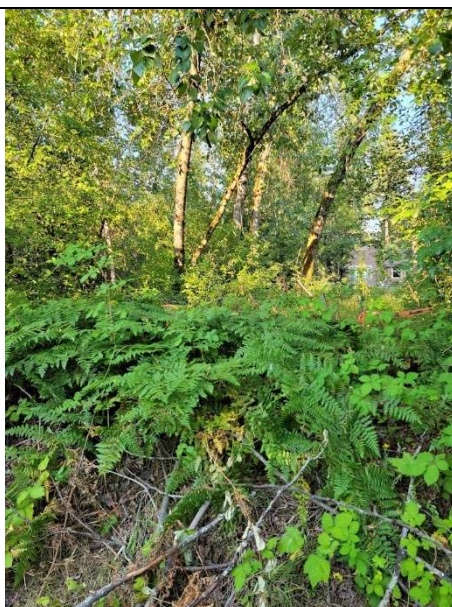
**Goff Creek on 132<sup>nd</sup> where Cutthroat Trout live.**



**A backyard of a Wilburton home.**



**Another backyard of a Wilburton home.**



**Wilburton home (behind the trees) surrounded by marshland.**



**Homes in Wilburton, another example of the surrounding ecosystem which includes Goff Creek and Kelsey Creek.**

**Young trees cannot make up for the tall trees providing cooler temperatures and shade for wildlife and streams.**

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2022/Kelsey\\_AR\\_Executive\\_Summary.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Kelsey_AR_Executive_Summary.pdf)

“The land cover in the Greater Kelsey Creek Watershed is typical of urban watersheds with a lower percentage of tree canopy and higher percentage of impervious surface ...Within Bellevue, ownership of the riparian corridor across all of the subbasins within the Greater Kelsey Creek Watershed is approximately 90 percent private property and 10 percent publicly owned (primarily parks)...”

The City has invested tens of millions of dollars in the Greater Kelsey Creek Watershed over the past 15 years on in-stream projects that include repairing stormwater outfalls, stabilizing stream slopes, removing fish passage barriers, catching and removing fine sediment, and improving conveyance.

Nearby cities like Renton show us what happens when upzoning goes unchecked: land values rise, affordability goals fall short, infrastructure lags, and livability declines. Let’s not repeat those mistakes here.

Thank you for considering my input,

Phyllis White  
Wilburton Resident

1. <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
2. [Climate change: Trees 'most effective solution' for warming - BBC News](#)



State of Washington

## Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

October 31, 2024

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

### **WDFW Comments Regarding the Wilburton Vision Implementation Land Use Code Amendments**

Dear Mr. Steiner,

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

### **Fish and Wildlife Resources and Recommendations:**

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

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



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

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

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

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

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

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

Sincerely,



Timothy Stapleton

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

CC:

Morgan Krueger, Regional Land Use Lead (Morgan.Krueger@dfw.wa.gov)

Kara Whittaker, Land Use Conservation and Policy Section Manager  
(Kara.Whittaker@dfw.wa.gov)

Marian Berejikian, Land Use Conservation and Policy Planner (Marian.Berejikian@dfw.wa.gov)

Stewart Reinbold, Assistant Regional Habitat Program Manager  
(Stewart.Reinbold@dfw.wa.gov)

Bethany Scoggins, Habitat Biologist (Bethany.Scoggins@dfw.wa.gov)

Jesse Dykstra, Habitat Biologist (Jesse.Dykstra@dfw.wa.gov)

## Nesse, Katherine

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**From:** Tate Anderson <tatersaurusrex7@gmail.com>  
**Sent:** Tuesday, May 13, 2025 8:55 PM  
**To:** PlanningCommission  
**Subject:** Luca feedback - Newport Hills

You don't often get email from tatersaurusrex7@gmail.com. [Learn why this is important](#)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear planning committee,

Hello planning committee, my name is Tate and I am 13 years old. I have been living in the Newport Hills area since kindergarten and believe that putting these apartments into our area is a very short sighted and rushed idea and o have a few reasons why these apartments should not be implemented:

1. Traffic.

Our area already has a lot of traffic coming from up and down our hill, so can you imagine if 100 more people were coming through the hill to get to work everyday? Cars would fill the streets and people wouldn't even be able to leave their parking lots! Then when people come back home from their jobs, they would need to wait another hour to park! This would be something that happens if these apartments are built and would be very infuriating for the residents of the community and personally for me as I need to take the city bus to get to school. I would never get to school on time because just getting out of the area would take so long!

2. Shopping district.

Newport hills is a shopping district. You can check google maps. People from the community and outside come here to get food, groceries, and for other necessities. While the shops are removed, people from the community won't be able to walk to the local pizza place or to run into the burger place and easily get back to their doorstep. Losing these place for the years that you build the apartments, people won't be able to hangout at these great local places. This will make our area lose character because these places are so beloved.

3. Character and atmosphere

Continuing on our areas character, we live in a peaceful and relatively quiet area and I think people enjoy that. Everyone has to deal with loudness once in a while, but the apartments are being built so close to other homes! This will ruin the atmosphere and the view. I am able to look out my window and see the sky whenever I feel a sad to calm me down. It wouldn't be very calming though if instead of the sky and moon, a tall building stares me right in the face instead would it?

Those are a few reasons that these apartments shouldn't be built and instead, you should plan a little longer and look at consequences before rushing in to build these. Thank you reading this and hope you consider this.

Sincerely, Tate.



## Nesse, Katherine

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**From:** Parmacek (US), Brett <Brett.Parmacek@boeing.com>  
**Sent:** Wednesday, May 14, 2025 1:44 PM  
**Subject:** OneBellevue| Fwd: Wilburton Community Association Opposition to Middle Housing LUCA  
**Attachments:** WilburtonOpposeLetterToCC.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

You don't often get email from brett.parmacek@boeing.com. [Learn why this is important](#)

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Received this from Betsi Hummer

I am sending this to a list of 39 but I have put you all in the CC column as I do not want to share your email with everyone. Just keeping you all in the loop.

Thank you,

**Brett Parmacek** - 

Senior Electrical Systems Integrator – VC-25B Program

Email - [Brett.Parmacek@Boeing.com](mailto:Brett.Parmacek@Boeing.com)

Cell - 425-269-0202 Cell phone

*Hire for Fit, Train for Competence, Coach for performance, Reward for results*

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**From:** Betsi Hummer <totemswrestling@gmail.com>  
**Sent:** Wednesday, May 14, 2025 12:24 PM  
**To:** Parmacek (US), Brett <Brett.Parmacek@boeing.com>; wilkelaurie@hotmail.com  
**Subject:** [EXTERNAL] Fwd: OneBellevue| Fwd: Wilburton Community Association Opposition to Middle Housing LUCA

EXT email: be mindful of links/attachments.

----- Forwarded message -----

**From:** David Cagle <[wilburtonpresident@gmail.com](mailto:wilburtonpresident@gmail.com)>  
**Date:** Wed, May 14, 2025, 11:14 AM  
**Subject:** OneBellevue| Fwd: Wilburton Community Association Opposition to Middle Housing LUCA  
**To:** <[onebellevue@googlegroups.com](mailto:onebellevue@googlegroups.com)>, <[savebellevueneighborhoods@gmail.com](mailto:savebellevueneighborhoods@gmail.com)>

This is what Wilburton sent.

----- Forwarded message -----

**From:** David Cagle <[wilburtonpresident@gmail.com](mailto:wilburtonpresident@gmail.com)>

Date: Tue, May 13, 2025 at 8:27 PM

Subject: Wilburton Community Association Opposition to Middle Housing LUCA

To: City Council <[council@bellevuewa.gov](mailto:council@bellevuewa.gov)>

Cc: Diane Carlson <[dcarlson@bellevuewa.gov](mailto:dcarlson@bellevuewa.gov)>

Dear Council members,

The Wilburton Community Associations wishes to voice its opposition to the draft Middle Housing Code Amendments. Please find our letter to the council attached.

--

David Cagle

President, Wilburton Community Association

--

David Cagle

President, Wilburton Community Association

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You received this message because you are subscribed to the Google Groups "One Bellevue" group.

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[onebellevue+unsubscribe@googlegroups.com](mailto:onebellevue+unsubscribe@googlegroups.com).

To view this discussion visit

[https://groups.google.com/d/msgid/onebellevue/CAEhsaw2GM5bw5h5cgg%3D\\_N3hL%2BqcMrCf9d2LrGOke0L1VPtGrNw%40mail.gmail.com](https://groups.google.com/d/msgid/onebellevue/CAEhsaw2GM5bw5h5cgg%3D_N3hL%2BqcMrCf9d2LrGOke0L1VPtGrNw%40mail.gmail.com).

## Wilburton Community Association Board Opposition to Bellevue's Draft Middle Housing Code Amendments

Dear City Council Members:

The Wilburton Community Association board members, along with 27 residents who signed our online petition at <https://www.wilburton.org/> oppose Bellevue's current draft Middle Housing Code Amendments. We urge the council to direct staff to restrict the code amendments to only meet state law.

The Draft Code Amendments go far beyond what is required by HB1110 and HB1337. They increase the height of flat roof buildings by 8 feet, essentially adding another story to the structure. They allow additional units per lot that aren't called for. They decrease setbacks and increase lot coverage. And they remove on-site parking requirements that will clog our residential streets—residential streets that have no sidewalks. All of these changes will do irrevocable damage to the neighborhood we love.

A huge number of additional housing units are already coming to Bellevue. Projects such as Pinnacle, Wilburton TOD, and Crossroads will add tens of thousands of additional housing units. The Wilburton TOD FEIS provides capacity for 14,800 units alone. All of these will soon be coming to Bellevue. The Bellevue housing target specified by King County, 35,000 by 2044, is more than satisfied by Bellevue's current housing capacity. Why must Bellevue radically change its single-family neighborhoods? Neighborhoods that have traditionally been Bellevue's heart and soul.

Please do not do this to our neighborhoods. The Wilburton Community Association Board urges you to modify Bellevue's residential code only as required to meet state law.

Wilburton Community Association Board of Directors

David Cagle, President  
LeeAnn Guidotti, Vice-President  
Jim Duong, Treasurer  
Phyllis White  
Dan Renn  
John Wu  
Pearl Nardella

## Nesse, Katherine

---

**From:** Parmacek (US), Brett <Brett.Parmacek@boeing.com>  
**Sent:** Wednesday, May 14, 2025 3:48 PM  
**To:** Robinson, Lynne; Malakoutian, Mo; Bhargava, Vishal; Lee, Conrad; Nieuwenhuis, Jared; Sumadiwirya, Claire; Hamilton, Dave  
**Subject:** Revision. Rockwood/Lancaster email ro council.  
**Attachments:** Dear Mayor and City Council 5-13-25.docx

**Importance:** High

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

You don't often get email from brett.parmacek@boeing.com. [Learn why this is important](#)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Bellevue Council members and Mayor,

Thank you for allowing me to speak last night at the Council meeting on the LUCA for Bellevue. I have attached the document that I summarized during my time at the podium. It has much more detail and some suggestions. This was a neighborhood effort and not just the voice of one individual.

### Bottom line

#### **We are not against Density. What we are asking that this is done in a measured and thoughtful approach.**

We fully support Mr. Bhargava's request for specific performance parameters to define real traffic, real infrastructure, real environmental concerns, and real Tree Canopy impacts. These should be written and then used to evaluate development in an "initial phase" of an amended LUCA. We concur with his analysis that implementing a more aggressive plan than the State is requiring leads to more risk that potentially can't be walked back. Mr. Lee suggested that Wilburton would be a good opportunity for a "pilot program". We agree with his idea to "try it there". We also applaud Mayor Robinson's suggestion that the individual characteristics of different neighborhoods should be considered as implementation takes place.

Assertions were made several times last night praising the previous "outreach" to the community. Never mentioned is that, to our knowledge, there was ZERO targeted outreach to existing single family NEIGHBORHOODS. Only three of the six "outreach sessions" were specifically for Middle Housing (the other three occurred during the Comp Plan update) and attendance at each was noted as comprising as many as 50 people. Much of the "outreach" was to members of the Bellevue Strategy 2044 Team. The only organized media reporting was from The Urbanist. We ask the City Council to inquire as to which Neighborhood Groups or HOA's were contacted. Multiple reference was also made last night regarding "overall positive community consensus" at the 4/23 PC meeting. Yet, most of us who are not frequent community activists (but will definitely be negatively impacted if the current Proposal goes through immediately) were unaware that there would be an opportunity to provide additional feedback on 4/23. As it was, there were only 16 eligible community speakers. Six of them were opposed to the Plan. We do not know how many of those in favor are residents of Bellevue. The April 9th Public Hearing had significantly more speakers and the majority did not support the Proposal.

There is growing resistance to how this plan will be implemented. It was unfortunate that the Staff did not stay for the open discussion that followed the Q&A session during the Cherry Crest Community meeting. There are many

unanswered questions. We desire a strategy that is shared with existing Neighborhoods. Let's implement the State's Minimum Mandate as Mayor Robinson suggested last night. As that progresses, additional phasing to build out Bellevue in a more planned and unhurried way can proceed.

Three of you; (Mayor) Lynn Robinson, Conrad Lee (Member) and Bhargava (Member) asked the Planning Committee to come back with answers to numerous questions for review at the next Council meeting. We assume that Ms. Sumadiwarya and Mr. Nieuwenhuis will also want to be de-briefed.

**We propose three additional suggestions for your consideration:**

**Prioritize Middle Housing at the entrances to Neighborhoods before moving them to the middle of a neighborhood.** If Middle housing is built closer to the Main roads (entrances and exits) there will be better walk-ability to transit, CoB would be able to evaluate to see if it works, understand the challenges, then implement any new rules for further expansion.

Example – In Chevy Chase Neighborhood you could allow Multi units to be built within the first 3 lots, on both sides, of the entrance to the neighborhood. These lots would be closest to 148th Ave. Instead of a “puzzle pieced” development, this would allow the interior character of the neighborhood to be maintained, interior traffic minimized, and still allow for increased density for that neighborhood.

**Put in restrictions for Neighborhood's such that Middle Housing aligns with the character of a neighborhood.**

Example - Maintain a minimum setback that match those of the Neighborhood and set a maximum building height of 30 feet (the current limit for lots with an R-20 designation). Front set-backs should be 20 feet. This restriction integrates better with existing front yard setbacks for SFR and should not include the sidewalk easement. Therefore, this would allow the neighborhood to maintain what makes it unique (Sidewalks, greenery and charm) and does not create unattractive complexes that “overwhelm” the surrounding houses. Thankfully, Mayor Robinson brought up the issue of cottages last night. We were surprised to learn that the cute cottages pictured in the Proposal are not representative of the potential 3 story monoliths that could be built!

**Review each neighborhood independently before approving the LUCA for all of Bellevue.**

As noted in an email sent to Council earlier this week, our Rockwood/Lancaster neighborhood is a prime example of a residential neighborhood that already sits within an existing multi-use area and Transition Zone. Mix-Use Neighborhoods like ours should be a low priority for future density efforts. The “Bel-Red Look Forward” District, is @1/8 mile from our neighborhoods' northern entrance on 140th. 148th Ave NE runs along our eastern border. Stevenson Elementary, commercial office buildings, a new Memory Care residential community, a church, and a gas station comprise our south border. Our western border is 140h Ave NE which is comprised of office buildings, duplexes, and multiple apartment complexes which include subsidized housing. Please review other neighborhoods that are surrounded by density such as ours. Although we don't have a “District” name, when viewed as a “large rectangle” bordered by four major thoroughfares we are already compliant with State mandates. We are also already experiencing major traffic disruptions due to the on-going development (that is still in the beginning stage) in the Spring District.

Much of this letter is common sense from the point of view of those of us that live in, and love these neighborhoods. We hope that you can join us in finding a more strategic plan to implement the growth of Bellevue in a manner that keep Bellevue the “Place to live”.

Thank you,

***The Neighborhood committee for Rockwood/Lancaster.  
39 Neighbors BCC'd,***

Dear Mayor and City Council,

We are residents of “Rockwood/Lancaster” neighborhood. Coincidentally, our neighborhood was used as an example in the Planning Commission Presentations (slide attached).

Our goal is to provide changes per the “bullets” below:

- **Deploy a “phased implementation plan”.** Some residential neighborhoods sit within existing multi-use areas, in Transition Zones, or near Mix-Use Urban Centers such as the Spring District and the forthcoming Wilburton District. These should be a low (high) priority for the implementation of the Proposed Codes. Our neighborhood is an excellent example of this. The recently named “Bel-Red Look Forward” District is @1/8 mile from our neighborhood’s northern boundary. 148 th Ave NE runs along our eastern border. Stevenson Elementary, commercial office buildings, a new Memory Care residential community, a church, and a gas station comprise our south border. Our western border is 140h Ave NE which is comprised of office buildings, duplexes, and multiple apartment complexes which include subsidized housing.
- **Implement the State Plan first.** Start with density of six units/lot within ¼ mile walking distance from major transit (per HB1110) rather than the proposed 1/2 mile for the right to build 6 units in residential neighborhoods. Per the Bellevue Plan, neighborhoods that are within 1/2 mile of major transit will have zero off-street parking requirements under the new mandate. Garbage trucks already have difficulty navigating in numerous neighborhoods due to congested street parking and tight radius cul-de-sacs. If a single home is replaced with a six-plex that has no on-site parking, there likely will be additional ramifications for the residents, Fire Trucks and Emergency Vehicles.
- **Maintain a minimum setback of 20 feet and maximum building height of 30 feet** (the current limit for lots with an R-20 designation). This integrates better with existing front yard setbacks for SFR and does not include the sidewalk easement. Therefore, aligns teardowns/re-development with existing structures.
- **Do Infrastructure studies of each neighborhood.** Without infrastructure impact studies, the LUCA should note actual implementation of the plan may require revision. Does not make sense to build before we know if the lot can support the change.
- **Traffic studies a must.** As an example, for our Rockwood Lancaster neighborhood, there are only 2 Entrance/Exits to the neighborhood. These Entrances/Exits are on 140th Ave and 148th Ave, which are very busy roads. Even now getting out of the neighborhood is a challenge during rush hours, but with more density it will be even more difficult. The Chevy Chase Neighborhood has only one Entrance and Exit onto 148th and there they can only turn right onto 148th. We need to make sure that when we add density to an already established area, we look at how the traffic for the neighborhood will be affected and what projects would be needed to make it work. New Traffic Lights, Widening of the streets, and infrastructure changes.
- **Develop a plan for established existing established neighborhoods.** Reduce the unit density to 2 units where the neighborhood is all already Single-Family Homes (SFH). This allows Density growth without impacting Traffic, Infrastructure, or character of the neighborhood. But it does create density. This could be done with SFH lots adding a DADO, ADU or Apt on the property. By limiting the number of Units in established Neighborhoods where multiple units can reside will help keep the character of the neighborhoods intact. One option is to also allow the building of these multi units closer to the Main roads (entrances and exits) to the neighborhoods. Example – In Chevy Chase Neighborhood you could allow Multi units to be built within the first 3 lots, on both sides, of the entrance to the neighborhood. These lots would be closest to the main road and in this case, it would be 148th Ave. This way the character of the neighborhood is not lost, and the density increases for that neighborhood.
- Look at current Density surrounding neighborhoods. Some neighborhoods are already surrounded by Apts, Condos, Businesses, Commercial and Townhouses like Rockwood. There are also current areas within these areas outside of the neighborhoods where more density can be created, and where it would have infrastructure already in place.
- On page 3 of the City of Bellevue Comprehensive Plan you say the following.

**“The diversity of Bellevue’s neighborhoods is a city treasure—the unique look and feel of each neighborhood depends on its location, history and natural and built environment.”**

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2024/cdd-23-673-cp-neighborhoods\\_0.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2024/cdd-23-673-cp-neighborhoods_0.pdf)

Page 4 outlines the factors influencing the future of neighborhoods. **Let’s keep these neighborhoods unique.** Let’s find a way to do this with the least disruption to these “City Treasures”.

Page 6 **“Success will require balancing the needs of the whole city while avoiding a “one size fits all” approach to neighborhood planning that undermines neighborhood distinctiveness.”**

Page 7 **“The city understands that not every neighborhood-specific concern is a citywide issue: some matters are best approached at a neighborhood-area”**

- Affordable Housing is a nice idea but will not work in practice. Multiple developers have already weighed in on that in previous Council and Planning Commission meetings. The focus on Affordable Housing will not bear out to be true. It is a nice idea in practice there is a clear reality. As Bellevue grows, so will the prices. Developers are only building for profit and will not give any of that away. The fee that is charged to the city by the developer in lieu of building affordable housing is a pittance that every developer will rather pay to maximize their profit. Also, we need to remember that this plan is over a 20 year period. The prices you are thinking about today for Middle Housing will not stay affordable for long. If you look to the San Francisco Bay area, LA, or Portland where this has been attempted, you will find that it does not work. Again, great idea, but not something that will work here. The only way to have affordable housing is if the City or State buys the property, builds the units and then, Sells the units with covenants or rents them. I imagine the Affordable housing units will be coveted like the Rent Controlled apartments in New York. People will never leave those units and currently those units are passed down to family members.
- As a tongue and cheek comment, I want to live in affordable housing in Beverly Hills. Imagine the issues with placing several 6 plex’s in the middle of the Beverly Hills neighborhood to create density. What would that do to the neighborhood?

All we are asking for is thoughtful consideration of how and where these middle housing units can go within a neighborhood. A measured and careful approach will allow us to see impacts and make updates. Allowing **any** Single-Family Lot to be bought, cleared, and built upon, is a shotgun approach. It invites a mess that we will need to move backward on. Let’s move forward in steps. It allows us to test the process, validate what works and build out the best Bellevue we can.

Thank you for your consideration.

Respectfully,

Your Neighbors from the Rockwood, Lancaster Neighborhood

Neighborhood representatives

Brett and Victoria Parmacek, Pat and Karrie Murphy, Andrea and Yumiko Orimoto, Laurie and Gary Wilke, Mirali, and Naga, Munugeti, Amber and Ray Lee. Bruce and Shulan Trinh. Michelle and John Kaplan.....

## Nesse, Katherine

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**From:** Monette Anderson <monette.anderson@gmail.com>  
**Sent:** Tuesday, May 13, 2025 6:22 PM  
**To:** PlanningCommission  
**Subject:** Luca feedback- Newport Hills

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

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Dear Planning Commission Members,

As a resident of Newport Hills and a parent of a student attending International School, I'm writing to express deep concern about the proposed HOMA LUCA and to strongly support the NHCC Board's request—alongside the Bellevue Chamber's PLUSH Committee—to pause and reassess the current proposal.

While I fully support the intent to increase affordable housing and revitalize our neighborhood centers, I believe the current LUCA falls short in several critical areas, particularly for our community in Newport Hills.

### **1. Displacement of Small Businesses and Loss of Local Access**

Newport Hills Shopping Center is not just a commercial space—it's our hub for daily life. The proposal, as it stands, risks displacing longstanding small businesses that serve as vital community anchors. With limited public transportation options, residents would lose walkable access to groceries, gas, and restaurants. Coal Creek becomes the next viable option—miles away and inaccessible for many without a car, particularly seniors and youth.

### **2. Transportation and Traffic Strain**

My son currently attends International School, a public choice school located across Bellevue. Due to the lack of bus service from Newport Hills, he relies on a city bus for his daily commute, which takes over an hour each way—despite the relatively short distance. The traffic bottlenecks coming off our hill add unnecessary hardship and demonstrate how our area's transportation infrastructure is already strained. Introducing greater density without adequate transit planning will only exacerbate these issues.

### **3. Lack of Targeted Outreach and Impact Analysis**

There has been insufficient outreach to affected neighborhoods like ours, and many residents are unaware of the scope and implications of this LUCA. A citywide "one size fits all" approach ignores the very real geographic and infrastructure differences between mixed-use areas. Newport Hills deserves tailored planning that respects its unique character and needs.



#### **4. Affordable Housing Goals Undermined by Fee-in-Lieu Option**

If affordable housing is the cornerstone of HOMA, then allowing developers to pay a fee-in-lieu to build units offsite—potentially outside of Bellevue—undermines the goal entirely. This tradeoff weakens community integration and equity.

In short, I respectfully urge the Commission to **pause the HOMA LUCA** and engage in deeper, neighborhood-specific planning that prioritizes infrastructure, community input, and meaningful affordability.

Thank you for your time and for considering the voices of Newport Hills residents who care deeply about thoughtful growth that uplifts rather than displaces.

## Nesse, Katherine

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**From:** Zhanbing Wu <zhanbing.wu@gmail.com>  
**Sent:** Wednesday, May 14, 2025 5:25 PM  
**To:** Council; Robinson, Lynne; PlanningCommission; Malakoutian, Mo; Nieuwenhuis, Jared; Lee, Conrad; Hamilton, Dave; Bhargava, Vishal; Sumadiwiry, Claire; Horner, Rebecca D; Gallant, Kristina; Mandt, Kirsten; Carlson, Diane (she/her)  
**Subject:** feedback - May 13 Council Meeting re Middle Housing LUCA

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Thank you for recognizing the complexity of Middle Housing LUCA and making the extra effort to ensure that the LUCA is well thought out and tailored to Bellevue's diverse neighborhoods. The proposed Middle Housing LUCA would have numerous unintended/unexpected consequences on the traffic, utilities, all sorts of services, and neighborhood characters. I do believe that the housing supply matters greatly, so does the quality of the neighborhoods. For issues with such long-term impact and irreversible consequences, I truly appreciate your desire to tread carefully.

I support Councilmember Bhargava changing the walking distance to Major Transit Stops from the proposed 1/2 mile to 1/4 mile. Thank you for taking the time to check out some areas in person. The city needs time to do more on-the-ground survey and in-depth analysis on the projected housing unit increases for both "1/4 mile" and "1/2 mile" scenarios, taking into consideration the existing CC&R's. It also needs to work through various scenarios regarding the impact on traffic, utilities, services, tree code, and neighborhood characters, keeping in line with the city's Comprehensive Plan. It's wise to do the minimum now given the lack of clarity and community support.

I'm particularly disappointed by Councilmember Hamilton depicting Age 40 as the dividing line between those for the proposed LUCA and those against it. It's a gross (and wrong) generalization based on a tiny sample (those who spoke at hearings). Many high tech workers younger than age 40 have bought homes in Bellevue. Have you talked to them? Instead of pitting one group against another, it's better to rally all residents to figure out a balanced solution to grow the city's housing supply.

For Middle Housing LUCA, the lack of community outreach is shocking. It gives people the feeling that you're trying to sneak in this drastic LUCA. Please stop the erosion of trust by stepping by dramatically the communication and discussion with the residents.

A few specifics:

1. **Please add an additional checklist item for developers: when applying for the permit, developers must verify that the planned development does not violate the existing CC&R's.** This could substantially prevent neighbor conflicts and lawsuits. Recommend that the city builds a repository of neighborhood CC&R's and makes it easier for developers to find the needed info.

2. The city staff mentioned that the developer will be required to verify the walking distance to a Major Transit Stop when applying for the permit. Some council members asked to confirm that it's a "real walking path". **Please clarify further: it should be a PAVED walking path that wheelchairs could use.** In an early public hearing, someone claimed that an equestrian path just north of the Bellevue Muni Golf Course is a viable walking path connecting 140th Ave NE and 148th Ave NE. That's a bark path, not to mention that you'd share the path with horses.
3. **Please clarify what constitutes the border of a "Center" and how the "1/4 mile walking distance" is measured.** Unlike a "Major Transit Stop", a "Center" covers a much bigger geographic area. Is the walking distance measured to the middle point of the Center or to its nearest corner? It may well be that a gas station or big parking lot sits at the corner while a grocery store sits at the other end, resulting in a walking distance much farther than 1/4 mile. Besides a grocery store, what other stores should be considered "essential" in reducing the need to drive? Perhaps the city staff should reach out to the communities in order to define the practical/sensible boundary of a "Center".
4. **AADU should be counted as a unit**, just like DADU. Otherwise it's very confusing.
5. It would be very helpful if the City can provide more pictorial explanations regarding the Middle Housing LUCA. For example, what do "4 units on a lot" and "6 units on a Lot" look like? If trees were cut down, where do the replacement trees go?
6. For the 38ft maximum building height, is there additional 12ft height bonus for tree retention offered by subsection E.5.c of the Tree Code? How is this height measured, from the lowest point of the building structure whether it's underground or not?

Thank you for listening.

Zhanbing Wu  
Bellevue resident