



Amended BelRed LUCA Letter Submission

From Diana Leo <diana@bellevuechamber.org>

Date Wed 7/8/2026 4:03 PM

To Villaveces, Andres <AVillavece@bellevuewa.gov>; Ferris, Carolyn <CFerris@bellevuewa.gov>; Goepppele, Craighton <CGoepppele@bellevuewa.gov>; Khanloo, Negin <NKhanloo@bellevuewa.gov>; Lu, Jonny <JLu@bellevuewa.gov>; Kennedy, Mariah <MKennedy@bellevuewa.gov>; Nilchian, Arshia <ANilchian@bellevuewa.gov>; PlanningCommission <PlanningCommission@bellevuewa.gov>

Cc Malakoutian, Mo <MMalakoutian@bellevuewa.gov>; Hamilton, Dave <DHamilton@bellevuewa.gov>; Briar, Naren <NBriar@bellevuewa.gov>; Robinson, Lynne <LRobinson@bellevuewa.gov>; Nieuwenhuis, Jared <JNieuwenhuis@bellevuewa.gov>; Bhargava, Vishal <VBhargava@bellevuewa.gov>; Sumadiwiry, Claire <CSumadiwiry@bellevuewa.gov>; Council <Council@bellevuewa.gov>; Whipple, Nicholas <NWhipple@bellevuewa.gov>; Gallant, Kristina <KGallant@bellevuewa.gov>

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

Dear Chair Lu and Planning Commissioners,

Please find [our follow-up letter](#) regarding the BelRed Look Forward LUCA. While I realize that this is very late and the meeting is in a few hours, I wanted it on the record that we are working hand in glove to ensure our letter reflects the email we received this morning from staff in response to our letter we submitted yesterday.

This letter updates our July 7th comments in light of the corrected working draft that City staff shared with us. While several of our earlier concerns have been addressed, our core issues around street grid feasibility, private street criteria, shared-use street typology, and the tension between mandatory affordability and project feasibility remain outstanding. We also restate our broader concern about the relative cost burden of this draft code compared to the Wilburton draft code.

We appreciate the continued engagement from City staff and look forward to further discussion on these items.

Please let us know if you have any questions.

V/r,
Diana

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PLUSH COMMITTEE

Permitting, Land Use, Sustainability, & Housing

staff@bellevuechamber.org



July 8, 2026

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

Re: BelRed Look Forward LUCA: Corrected Strike Draft and Our July 7 Letter

Dear Chair Lu and Planning Commissioners,

Yesterday, on behalf of the Bellevue Chamber's PLUSH Committee and the BelRed Property Owners Group, we submitted a letter consolidating the status of our outstanding concerns with the BelRed Look Forward LUCA. This morning, City staff let us know that the strike draft published with the Commission's packet was the May study session version and shared the corrected working draft dated June 26, 2026. We write to update our comments based on this helpful communication from staff.

The updated draft addresses a number of the items we had raised, including the reduced active use frontage standard. We want to be clear that our July 7 letter was written against a draft that did not reflect staff's most recent work. Kristina Gallant, Nick Whipple, and their colleagues in Development Services have been consistent, engaged partners throughout this process, and their quick and transparent handling of this mix-up is a good example of that partnership.

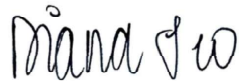
Having reviewed the changes, many of the requests and recommendations in our July 7 letter remain valid. Our core concerns are unchanged:

- **Mandatory street grid feasibility.** The flexibility language in 20.25D.020.B.1.c still does not allow a mapped street segment to be eliminated when it is impossible or too onerous to construct; each segment should be analyzed for physical and financial feasibility and the code modified accordingly. If the City wants a mandatory public street grid, it remains the only party that can deliver one: the grid has been proposed since 2009 and remains unbuilt because it is too onerous for private parties to accomplish.
- **Off-ramp and private street criteria.** If the City intends maximum flexibility, private streets that meet emergency vehicle access standards should be allowed outright.
- **Shared-use street typology.** The code still contains no shared-use or low-vehicular street typology, despite other cities' already-completed work.
- **Mandatory affordability and feasibility.** The tension between the mandatory affordability

more costly than the Wilburton draft code. Properties carrying street grid obligations or stream restoration requirements receive little credit against the code's other demands for absorbing those costs, and the added burden of providing upfront capital for electrical utility infrastructure (which is not a code issue but is a real impediment BelRed properties are facing) compounds them. These uncredited requirements continue to create dramatic impacts on the feasibility of projects, particularly lower-profitability projects with larger affordability set-asides, the very projects this code is intended to produce.

We will be meeting with staff again soon to work through additional details and recommendations, and we continue to appreciate their active engagement. Thank you for your attention to this work.

Sincerely,

A handwritten signature in black ink that reads "Diana Leo". The signature is written in a cursive, flowing style.

Diana Leo
Vice President of Government Affairs
Bellevue Chamber of Commerce
On behalf of the PLUSH Committee and BelRed Property Owners Group

Cc: Mayor Mo Malakoutian, Deputy Mayor Dave Hamilton, Bellevue City Councilmembers; Kristina Gallant, Planning Manager; Nick Whipple, Code and Policy Director



Outlook

July 8th Planning Commission Meeting - Bel-Red LUCA

From Charlie Bauman <charlie@gtcptl.com>

Date Wed 7/8/2026 4:53 PM

To PlanningCommission <PlanningCommission@bellevuewa.gov>

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

Dear Planning Commissioners,

I'm submitting these comments on the latest Bel-Red LUCA draft ahead of tonight's Staff review. Three topics deserve your discussion and direction.

- A. Provide a real cost offset for public-benefit infrastructure, streams and streets.** Projects burdened with required streets or streams face very high development costs, and the code doesn't offer a workable incentive or cost offset to make them feasible. The code also imposes a blanket mandatory affordability requirement that alone can cost a project millions, with no offset for the added cost of building public local streets or restoring a degraded stream. As written, the projects that are hardest to develop in the first place carry the same mandatory fees as every other project, plus the entire cost of public streets and stream restoration on top of that. That's untenable, and it will mean many of these projects simply don't happen, which is exactly the pattern that has left Bel-Red with a chronic undersupply of housing for 15+ years. The fix is a meaningful cost offset: spending on public-benefit infrastructure like roads and streams should be creditable against other mandatory fees.
- B. Treat stream daylighting and restoration equally.** One specific fix: expand 20.25D.050.B.2.c.i to include sites "restoring a stream," not just "daylighting" one. This section gives sites burdened by a degraded stream added flexibility on amenity points. The CAO defines "daylighting" narrowly as removing a stream from a culvert, and I'm concerned that a strict future interpretation will apply this flexibility only to culvert removal, not to restoration of degraded streams that are straightened or in armored channels. The CAO itself places equal weight on daylighting and restoration; the incentive code should too. As a concrete example, 60% of Goff Creek will be restored rather than daylit, both are ecologically important and both deserve equal incentive treatment under this code.
- C. Finish the fix on the street grid.** This code has come a long way toward fixing the "geometric" constraints that have blocked development in Bel-Red for 15+ years, most notably the overly prescriptive street grid and the extensive stream and critical area setbacks and buffers that, together, left too little buildable area for projects to pencil. Much of that has been addressed, but the remaining local street requirements still need work. They should be removed: they duplicate the 1,200-foot block perimeter requirement (which Staff already has discretion to apply through development review) and add unnecessary cost that makes projects harder to build.

Thank you for your continued dedication to bringing housing to Bel-Red.

Regards,

Charlie Bauman
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