



# Bellevue Planning Commission

November 6, 2024

## PLANNING COMMISSION STUDY SESSION ITEM

### SUBJECT

Study Session on the Wilburton Vision Implementation Land Use Code Amendment (LUCA).

### STAFF CONTACT(S)

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### POLICY ISSUES

On July 23, the City Council adopted [Ordinance No. 6802](#) amending the Comprehensive Plan's Volume 2 Wilburton/N.E. 8th Street Subarea Plan with proposed Wilburton Transit-Oriented Development (TOD) area policies and map changes. Tonight, the Planning Commission will consider the proposed Wilburton LUCA, which is one policy tool for implementing many of the recent policy and map changes.

### DIRECTION NEEDED FROM THE PLANNING COMMISSION

**ACTION**

**DIRECTION**

**INFORMATION ONLY**

The proposed LUCA will rely on Land Use Code (LUC) chapters and sections that apply citywide, amending those chapters and sections as needed to address future development within a new category of land use districts: "Mixed-Use Districts," which will be established by this LUCA. The proposal will also create a new Part 20.25R of the LUC to respond to the specific needs within the approximately 300-acre Wilburton TOD area, such as the implementation of various street typologies, the establishment of smaller walkable blocks, and design requirements addressing unique elements of Wilburton, including the Eastrail, Grand Connection, and sustainability district concepts. Additionally, the new Part 20.25R LUC will include an amenity incentive program to support achieving the vision for Wilburton. A full draft LUCA is provided as Attachment A.

For ease of Planning Commission discussion and deliberation, the proposed LUCA will be presented through study sessions focused on three main topic areas: (1) Site Organization; (2) Building Design; and (3) Inclusive TOD.

These topic areas are organized, in part, as they would occur on a development site plan and in a sequence that allows the necessary analysis from the Nexus and Proportionality Study regarding an affordable housing approach to be available at the point when the Planning Commission is scheduled to discuss this policy topic. The sequencing of study sessions will also enable the Commission to reflect back before scheduling the public hearing on how the proposed LUCA can deliver equitable public benefits.

**WILBURTON PLANNING COMMISSION SCHEDULE**

	<b>LUCA Topic Areas</b>
<input checked="" type="checkbox"/>	<p><b>Study Session 1 (February 14): Overview of LUCA Structure</b></p> <ul style="list-style-type: none"> <li>• Summary of LUCA purpose and structure</li> </ul>
<input checked="" type="checkbox"/>	<p><b>Study Session 2 (March 27): Transportation, Streets &amp; Blocks, Parking</b></p> <ul style="list-style-type: none"> <li>• Block size standards</li> <li>• Street typologies</li> <li>• Parking minimums</li> </ul>
<input checked="" type="checkbox"/>	<p><b>Study Session 3 (September 11): LUCA Elements Overview and Status Update</b></p> <ul style="list-style-type: none"> <li>• Status update since draft LUCA was released on May 31</li> <li>• Overview of the following LUCA elements:               <ul style="list-style-type: none"> <li>○ Land Use Districts approach</li> <li>○ Land use flexibility</li> <li>○ Access, streets, and blocks</li> <li>○ Open space and green factor</li> <li>○ Amenity incentive system</li> </ul> </li> </ul>
<input type="checkbox"/>	<p><b>Study Session 4 (November 6): Site Organization</b></p> <ul style="list-style-type: none"> <li>• Block sizes</li> <li>• Street typologies, pattern</li> <li>• Activation and open space</li> <li>• Response to Commission questions shared at March 27 study session</li> </ul>
<input type="checkbox"/>	<p><b>Study Session 5 (December 11): Building Design</b></p> <ul style="list-style-type: none"> <li>• Building heights, Floor Area Ratio (FAR), floorplate sizes</li> <li>• Mix of uses</li> <li>• Parking</li> </ul>
<input type="checkbox"/>	<p><b>Study Session 6 (January 8): Inclusive TOD</b></p> <ul style="list-style-type: none"> <li>• Affordable housing approach</li> <li>• Amenity incentive program</li> </ul>
<input type="checkbox"/>	<p><b>Public Hearing (To Be Scheduled):</b></p> <ul style="list-style-type: none"> <li>• Required Public Hearing</li> <li>• Planning Commission Recommendation</li> </ul>

**BACKGROUND/ANALYSIS**

**Background**

The Wilburton Vision Implementation Initiative Comprehensive Plan Amendment (CPA) and LUCA was introduced to the Planning Commission at their May 11, 2022 study session following official launch of the initiative with the City Council on April 25, 2022. The Planning Commission held 16 study sessions on the CPA between the launch and public hearing, including an introduction to the general structure of the

LUCA on February 14. The Planning Commission also had questions and provided direction to guide code development for transportation, streets, and blocks at their March 27 study session. The Planning Commission recommended approval of the CPA following the May 1 public hearing and the City Council voted to adopt [Ordinance No. 6802](#) implementing the Wilburton Vision Implementation CPA on July 23.

On September 11, staff provided an update on priorities to be implemented through the LUCA, including land uses, access, streets, blocks, a sustainable district framework, open space and green factor requirements, building design (such as density and dimensional standards), landscaping, and incentives. Staff also highlighted parallel efforts, including the development of a sustainable district framework and a Wilburton TOD Access Concepts Design Guide, which will be incorporated into the City's Transportation Design Manual. The Transportation Department, as authorized by Transportation Development Code BCC 14.60.21, to prepares, adopts, and update design standards to establish minimum requirements for the design and construction of transportation facilities in the Transportation Design Manual. The Wilburton TOD Access Concepts Design Guide will support implementation of multimodal access and walkability concepts for the TOD, the subject of tonight's study session. Excerpts from this guide are provided for context and informational purposes only as Attachment B. The design manual provides engineering standards for civil engineers in street and roadway design within Bellevue. It sets minimum design and construction requirements for transportation facilities and guidelines to protect existing infrastructure during construction. The Transportation Department Director, under BCC 14.60.40, is authorized to prepare, adopt, and update these standards, ensuring they align with the Bellevue City Code, Comprehensive Plan, and relevant publications.

### **LUCA Development Approach**

On May 31, staff published a preliminary draft of the LUCA for public review and stakeholder discussion, presenting two distinct options for addressing affordable housing needs in Wilburton. The intent behind offering different options was to illustrate various implementation pathways. Option A includes an affordable housing requirement, meaning projects within the TOD must provide affordable housing as part of redevelopment. This option is balanced with higher base floor area ratios (FARs) or "by-right" development. Option B proposes a voluntary affordable housing approach through incentive zoning, allowing projects to provide affordable housing in exchange for height and floor area to build a larger structure. This approach features lower base FARs and prioritizes affordable housing as a first-tier amenity when a project exceeds the base FAR or height limit. A more detailed policy discussion on the two LUCA options is scheduled with the Commission for January 8, 2025.

On October 10, staff published a second full draft of the LUCA for public review and feedback. This draft included revisions to the May 31 version and did not present Option B as a standalone alternative. Instead, it incorporated callouts indicating where the Option B approach differed from Option A, specifically regarding the affordable housing provisions (required vs. incentivized). Staff have since received additional comments on the revised draft, though significantly fewer than during the initial draft's publication. For ease of reference, staff highlighted changes made since the May 31 draft, with explanations provided near areas of high interest for stakeholders.

### **March 27 Planning Commission Study Session**

The Planning Commission reviewed LUCA recommendations for similar topic areas proposed for tonight's discussion (transportation, streets, and blocks) at the March 27 study session. At this study session, the Commission provided feedback and requested additional information. This information is

summarized below, and previous Commission direction and feedback was also used to inform the revised draft LUCA included as Attachment A.

What considerations were given to implementing a “woonerf” concept for Wilburton?

The current LUCA draft does not explicitly incorporate woonerfs, but it provides safe, attractive, and comfortable access solutions through local streets, flexible access corridors and active transportation corridors designed for various modes of transportation. The LUCA provides options for developments to include a local street or flexible access corridor that separates vehicles and pedestrians or an active transportation corridor that can accommodate shared use for emergency vehicles and active transportation. Bollards will restrict general vehicle travel on the active transportation corridor. These corridor types prioritize pedestrian safety and comfort, featuring wide walking and biking paths, landscaping, and lighting to create an inviting and secure pedestrian environment, aligning with the intended outcomes of a woonerf.

Achieving a true woonerf concept in Wilburton, however, may be challenging. Since parking requirements are likely to remain a component of these developments, vehicle traffic will naturally be a part of the area’s access corridors. With the anticipated density of the projects, we want to ensure that pedestrians feel safe and comfortable without the concern of frequent vehicle interactions. While the woonerf idea blends pedestrian and vehicle spaces, the expected level of traffic could impact how well this concept can be achieved.

What considerations went into the required 70-foot width for local streets?

Since the March 27 study session, the required width for local streets in the Wilburton TOD area has been reduced from 70 feet to 67 feet. These streets, as specified in Figure 20.25R.020.B.1 of the draft LUCA, are only required in limited locations within the TOD. A majority of access types will need a corridor width of 51 feet or less. Local streets must include vehicle travel lanes, parking lanes, sidewalks, amenity zones, and curbs. The revised width seeks to balance traffic accommodation with greater walkability, featuring two 10-foot sidewalks and two five-foot landscaping/amenity zones.

In comparison, Wilburton's local streets will be six feet wider than a typical BelRed local street, providing more generous pedestrian spaces. BelRed local streets require six-foot sidewalks compared to the 10 feet in Wilburton. As an additional reference point, typical BelRed arterials, which have a different function than a local street, range from 69 to 113 feet in total width. These arterials tend to prioritize wider travel lanes or turn lanes over street parking and require smaller sidewalks. The revised dimensions for Wilburton local streets aim to implement the vision for a pedestrian-friendly environment while still accommodating vehicular traffic.

The proposed block dimensions create a walkable block, but there will need to be consideration for building typologies in relation to block size.

The current LUCA draft includes building dimensional and design requirements that will be covered in greater detail at the December 11 study session.

**LUCA Topic Area: Site Organization**

Tonight’s study session will focus on site organization topics, including block size requirements, street typologies for Wilburton, ground level activation, and open space. Below is a table that provides relevant Wilburton policies that have been adopted that serve as the basis for the proposed LUCA

provisions relating to block size requirements, street typologies, ground level activation, and open space.

<b>Site Organization:</b> block size requirements, street typologies, ground level activation, and open space
<b>Relevant Wilburton Policies</b>
<b>S-WI-35.</b> Provide for ground floor uses and publicly accessible open spaces that support an engaging pedestrian experience.
<b>S-WI-37.</b> Develop compact, mixed-use site and neighborhood configurations that support through-block and active transportation access to transit, the Eastrail corridor, the Grand Connection, and adjacent developments.
<b>S-WI-46.</b> Promote and implement sustainable mobility through integrated transportation and land use planning, increased access to low carbon transportation options, and innovative technologies.
<b>S-WI-54.</b> Seek, through the development process, small-scale facilities, such as neighborhood parks, plazas, active recreation facilities, and natural features as public amenities to increase community access to open space opportunities.
<b>S-WI-55.</b> Provide a system of active transportation connections that links park facilities, including Bellevue Botanical Gardens and Wilburton Hill Park, with other parks and points of interest, including transit, employment, and medical facilities.
<b>S-WI-56.</b> Enhance active transportation and through-block connections with landscaping and amenities to serve as linear open spaces.
<b>S-WI-59.</b> Require and/or incentivize public access and open space opportunities linking the Grand Connection to 120th Avenue NE and residential neighborhoods east of 120th Avenue NE.
<b>S-WI-63.</b> Incorporate an integrated system of local access and active transportation facilities to support the intended transit-oriented and trail-oriented land use pattern.
<b>S-WI-64.</b> Require publicly accessible internal access corridors to facilitate mobility and livability through development review.
<b>S-WI-65.</b> Work with developers to provide vehicle access onto their site via internal access corridors rather than along arterial streets.
<b>S-WI-70.</b> Secure abundant active transportation access to the Eastrail and along/adjacent to the Eastrail through development review.
<b>S-WI-72.</b> Use transportation facility design guidelines and standards that support the intended land use pattern, ensure safety and accessibility for all users, and advance an efficient development review process.
<b>S-WI-76.</b> Use design guidelines and standards that promote a high-quality, attractive, and safe pedestrian environment with ample access to sunlight, air, and weather protection.
<b>S-WI-77.</b> Support a wide range of active uses and gathering spaces, prioritizing these opportunities fronting the Eastrail corridor and the Grand Connection.

**S-WI-79.** Require buildings to be developed in a manner that provides direct connections to the Grand Connection.

**S-WI-80.** Use land use code tools that enable development contributions toward public benefit, including affordable and family-sized housing units, open space, and community and cultural spaces.

**S-WI-87.** Use design guidelines and standards that promote a high-quality, attractive, and safe pedestrian environment

**S-WI.91.** Coordinate with public and private development so that planned infrastructure, amenities, and uses are provided efficiently and integrated with the surrounding environment.

### **Recommended Land Use Code Amendments**

#### **Block size requirements and street typologies**

Staff have revised the perimeter block size requirements since the March 27 study session. The maximum perimeter of a block is still recommended to be 1,200 feet, but more options to frame a block are provided with this update, including revised dimensions. These changes are noted by an asterisk in the list. Walkable blocks must be bounded on all sides by the following street typologies:

- Existing public rights-of-way;
- Local street. Public streets, dedicated as right-of-way, intended for vehicular and non-motorized traffic (67 feet wide\*);
- Flexible access corridor. Privately-owned but publicly accessible access for vehicular and non-motorized access needs (51 feet\*);
- Active transportation access corridor. Non-motorized access and pathways that provide access to private property as well as public amenities, such as Eastrail. May double as a fire lane\* (two options, both 30 feet wide\*);
- Pedestrian corridor\*. Larger pathways to provide public access through and between larger blocks or development sites (14 feet wide);
- Eastrail\*; or
- Grand Connection\*

\* indicates a change since the March 27 study session and May 31 LUCA publication.

Staff also revised the following block size requirements based on Commission and stakeholder feedback:

- Block size requirement not applicable on sites less than 100,000 square feet in size or sites between Interstate 405 and 116th Avenue NE
- The north-south block dimension shall be no more than 350 feet

The proposed LUCA outlines a hierarchy of corridors that include local streets, flexible access corridors, active transportation access, pedestrian corridors, and major walking and biking routes like the Eastrail and Grand Connection. The LUCA also requires non-motorized connections to Eastrail every 350 feet along the Eastrail corridor, allowing for flexibility if King County does not authorize these connections. These interconnected networks, alongside block size controls, aim to facilitate walkability, which is essential for transit-oriented development, connecting people to transit, parks, and destinations such as plazas, parks, and commercial activity.

### **Ground level activation**

Ground level activation will be achieved through requiring “Active Uses” along the access types described above. Active uses are intended to engage pedestrians and enhance public safety and the urban experience. Active uses must comprise 50% of the ground level along most access types and 75% of the building frontages along Eastrail and Grand Connection. Where active uses are required, overhead weather protection is required for a majority of the building façade.

Active use is defined as follows:

*Land uses including, but not limited to, retail and wholesale uses, restaurants, personal and professional services, residential and commercial lobbies, residential units (with entry and stoop or private patio), private indoor residential amenity spaces, live/work spaces and others as determined by the Director, which can create a vibrant urban atmosphere by providing for commercial activities, street activation or gathering spaces for the public.*

### **Open space and green factor**

The proposed open space and green factor approach in the LUCA aims to create a vibrant and accessible urban environment with ample opportunities for recreation, socialization, and interaction with nature through the following provisions:

- At least 10% of the site must be provided as publicly accessible open space. Exceptions include small sites and specific areas that may be subtracted from the open space calculation area (e.g., critical areas and buffers).
- This space is required to be accessible and inviting for the public, with certain areas like upper-level podiums connecting to Eastrail allowed as open space.
- Non-vehicular elements of required access corridors, such as sidewalks, landscaping, and amenity zones may contribute to the open space requirement.
- Landscape areas are required along Interstate 405, surface parking areas, and within access corridors.
- Off-site property dedicated to the city for parks within the TOD (minimum 4,000 square feet) can count towards on-site open space requirements
- All development must achieve a minimum green factor score. The score can be achieved based on ecological enhancements like tree preservation, green roofs, living walls, landscaping for food cultivation, or native plantings. This promotes green infrastructure and sustainable landscaping.

### **Additional Supporting Analyses**

The City contracted with Community Attributes Inc. (economic analysis) and NBBJ (sustainability and urban design) to analyze the financial and development feasibility of proposed design guidelines and standards, dimensional requirements, sustainability incentives, and amenities in delivering desired public benefits for the Wilburton TOD area. The LUCA is built from the adopted Wilburton policies and supported by staff and consultant expertise in the areas of economic analysis, sustainability, and urban design.

## **Public Engagement**

Engagement specific to the LUCA builds on extensive engagement on the initiative as a whole throughout 2022 to 2024. Since the public draft LUCA was released on May 31, staff have held 16 engagement meetings, including a public information session, with an additional information session planned before the end of this year. The purpose of these meetings was to better understand specific code concerns and major cost drivers and work to respond to those concerns to the extent practicable with code revisions, while not compromising the long-term vision for the TOD area.

These meetings have included direct engagement with Wilburton property owners, affordable housing groups, the Bellevue Development Committee, and other interested parties. Stakeholders at these meetings have noted the challenge of development feasibility in the current market and gave feedback that, in their opinion, the initial draft LUCA greatly added to the cost and complexity of development in the TOD thereby making development feasibility more challenging. Affordable housing stakeholders have reinforced the importance of maximizing affordable housing opportunities and have emphasized that this is a critical moment to leverage the significant increase in development capacity to create meaningful affordable housing solutions, while also navigating the challenges associated with development feasibility in the current market.

Topical stakeholder workshops have covered: access, streets, and blocks; dimensions, land uses and nonconformances; green building requirements and incentives; and housing and affordable housing. During these workshops, staff generally revisit stakeholder comments on these topics, present initial staff-reviewed amendments and responses, and gather ideas from the group on alternative approaches. Cross-team and -department vetting was a necessary component of the amendment process to review alternatives developed in these workshops. No further stakeholder workshops are planned at this point.

## **ATTACHMENT(S)**

- A. Strike-Draft of Proposed Wilburton LUCA
- B. Excerpts from the Wilburton TOD Access Concepts Design Guide