



Bellevue Planning Commission

December 11, 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.

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 LUCA PLANNING COMMISSION SCHEDULE

	LUCA Topic Areas
<input checked="" type="checkbox"/>	<u>Study Session 1 (February 14): Overview of LUCA Structure</u> <ul style="list-style-type: none"> Summary of LUCA purpose and structure

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

BACKGROUND/ANALYSIS

Background

The Wilburton Vision Implementation LUCA is the culmination of a City-initiated planning initiative for the Wilburton TOD area, implementing the vision, goals, and policies in the Wilburton Comprehensive Plan Amendment (CPA), adopted by [Ordinance No. 6802](#) on July 23. The draft LUCA, updated since the last study session on November 6, is provided as Attachment A. The LUCA establishes standards, design requirements for land uses, height and form, FAR, the amenity system, landscaping, parking, street and pedestrian circulation, and other elements for the Wilburton TOD.

LUCA Development Approach

On May 31, staff published a preliminary LUCA draft for public review and stakeholder input, presenting two options to address affordable housing in Wilburton. Option A includes an affordable housing requirement, where projects within the TOD area must provide affordable housing on-site or pay a fee in-lieu as part of redevelopment, balanced with higher base floor area ratios (FARs) or "by-right" development. Option B proposes a voluntary incentive zoning approach, allowing projects to provide affordable housing or pay a fee in-lieu in exchange for increased height and FAR. This approach features lower base FARs and prioritizes affordable housing as a first-tier amenity for projects exceeding base FAR or height limits. A detailed policy discussion on these 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.

On December 4, a third full draft was published for Planning Commission review and feedback. Staff have also received additional feedback from stakeholders that focused on future topics, such as building design and nonconformities, both subjects of tonight's study session. For ease of reference, staff highlighted changes made since the October 30 draft LUCA.

Planning Commission Review

On November 6, the Planning Commission reviewed recommendations to facilitate smaller walkable blocks in Wilburton, including requirements for block sizes, street typology options and pattern, ground floor activation, Eastrail connections, and open space. At this study session, the Commission provided feedback and requested additional information, including a better understanding of the stakeholder requests and staff responses to those requests. Stakeholder requests have been catalogued in a [comment tracker](#) that is posted to the project webpage. The comment tracker is organized by study session topic area and includes a column to document the staff response. Responses to Commissioner questions are summarized below.

What insights can staff offer regarding the economic analysis, and how should the Commission approach the question of development feasibility in relation to the proposed LUCA for Wilburton?

The economic analysis conducted by the City's consultant offers a snapshot in time. Based on feedback from developers, we have adjusted the economic model, which now reflects a more accurate portrayal of the challenges to development feasibility.

Staff continue to emphasize that planning for Wilburton should prioritize long-term community benefits over short-term financial metrics, such as developer return benchmarks. While market conditions and return thresholds are important, they are transient factors within a dynamic economic environment. With the proposed rezone, property values in the area will increase significantly. The City has a responsibility to leverage the value generated with the rezone to support the community's broader goals, especially as the proposed rezone is a direct response to significant public investments in infrastructure and amenities like Eastrail and light rail.

We understand the concerns raised by the development community about the LUCA potentially increasing development costs. In response, staff have collaborated closely with stakeholders through 16 workshops to identify specific cost drivers within the LUCA and mitigate their impact where practicable, without compromising the long-term vision for the TOD area. We are balancing these code adjustments with the fact that the area is receiving a significant upzone, generating substantial value, but we recognize that developing at these higher densities also comes with increased costs.

While we acknowledge this is a challenging development cycle, and we're hopeful that we will see further interest rate changes that will improve project feasibility, we do need to maintain a long-term perspective in our policy-making to achieve the vision that the Council has adopted for this area. We're also mindful that elements like weather protection, open space, green factor, and connectivity are standard expectations for development across East Main, BelRed, and Downtown, and we don't foresee a situation where these LUCA requirements would prevent us from realizing affordable housing and other key elements in the TOD.

What considerations were given to the on-street parking requirement for local streets?

The on-street parking requirements for local streets in the Wilburton TOD area were carefully considered, given their limited applicability. Local streets are sparse in this area, and none of Wilburton's arterials currently include on-street parking. The requirement aligns with Wilburton's TOD principles by supporting a future land use pattern that anticipates significant increases in housing and job capacity over the next 20 years (SI-WI-63). Additionally, some on-street parking is necessary to complement lower minimum parking requirements for new developments, ensuring access to services and amenities for those traveling by car (S-WI-36). Developers choosing to build flexible access corridors are not required to include on-street parking unless it specifically supports their development needs. On-street parking also offers traffic calming benefits by helping reduce vehicular speeds on local streets, contributing to safety improvements. However, to address stakeholder requests for narrower corridors, staff will prepare an option for the Planning Commission to eliminate the on-street parking requirement, which would reduce the minimum corridor width from 67 feet to 51 feet. This option will be presented for consideration during the public hearing, ensuring a balanced approach that reflects stakeholder input while supporting the TOD vision.

How can we provide more flexibility for access corridors, recognizing the need to maximize housing and development capacity in Wilburton while providing for livability?

The proposed access corridor approach offers significant flexibility while balancing cost considerations with the need for safe and livable spaces in the Wilburton TOD area. The access corridors are designed to support substantial growth, as the TOD area will have the capacity to accommodate 12 million square feet of commercial development, 14,800 new housing units, and 35,500 additional jobs. The proposed access corridors also aim to address repeated feedback from developers to maximize site efficiency and reduce costs by allowing access corridors to be private, which offers developers notable advantages. Unlike in BelRed, where streets are publicly dedicated, access corridors in Wilburton (except for Local Streets) will be private and allow larger below-grade parking garages to span beneath access corridors, optimizing space usage and reducing construction expenses. The proposed LUCA will also allow buildings up to 70 feet in width to span over private access corridors with adequate clearance heights, enabling more efficient site designs.

Developers can also customize corridor widths to align with project needs, with most corridors being 51 feet wide or less—smaller than the 61-foot minimum required for non-arterial streets in BelRed. Adjacent property owners can share access corridors, making it easier to meet perimeter block requirements and share the cost of developing access corridors. By incorporating lessons from BelRed, this approach provides more adaptable and cost-effective solutions that align with Wilburton’s ambitious housing and development goals while enhancing livability.

What is the process to request a deviation from the Transportation Design Manual?

To request a deviation from the Transportation Design Manual, the project’s Design Engineer must demonstrate that adherence to the standard is not physically or technically feasible or would result in undesirable impacts to public or private infrastructure and property or would impact critical areas. The process requires submitting a completed Design Justification Form, signed and sealed by a licensed professional engineer, along with supporting documentation. The Transportation Department Director or a designated representative will review the request, considering factors such as safety, functionality, accessibility, and adherence to industry standards. During construction, deviations may also be requested if unforeseen constraints arise. The final decision will ensure alignment with the intent of City standards and will be provided in writing. The complete deviation process is outlined in the Transportation Design Manual.

How do the proposed perimeter block distance requirements for Wilburton compare to Downtown Bellevue, Downtown Portland, and the South Lake Union neighborhood in Seattle?

The proposed perimeter block distance requirements for Wilburton are 1,200 feet, which differs from those in Downtown Bellevue, Downtown Portland, and Seattle’s South Lake Union neighborhood. Downtown Portland has compact blocks, each 200 feet per side with an 800-foot perimeter, promoting exceptional walkability. Downtown Bellevue features much larger superblocks, around 600 feet per side with a 2,400-foot perimeter, necessitating through-block connections to improve pedestrian access. South Lake Union blocks are intermediate in size, about 240 by 320 feet with a perimeter of 1,120 to 1,200 feet, balancing vehicular access and walkability. Wilburton block sizes are proposed to be 1,200 feet. These variations shape the character and functionality of each neighborhood.

What other ways might we require activation around a parking garage without prescribing a 20-foot-deep space for active uses?

To ensure pedestrian-friendly design around parking garages, the proposed LUCA requires wrapping the ground floor with a minimum of 20 feet of habitable space for residential or commercial uses. Recognizing challenges with leasing such spaces and construction inefficiencies building these spaces, the updated LUCA draft introduces a departure option. This departure option allows developers to replace the habitable space requirement with design enhancements like art, glazing, or other garage treatments that activate the pedestrian environment while maintaining flexibility.

How can we provide a hierarchy of open spaces and support an open space fee in-lieu program?

The proposed LUCA addresses open space needs by requiring that 10% of sites larger than 40,000 square feet be designated as open space. This requirement is designed to ensure a variety of open space sizes, reflecting Wilburton’s diverse lot configurations. Additionally, the LUCA has been updated to specify larger open spaces on the eastern edge of Eastrail, at the intersection of the Grand Connection and Eastrail. This area is identified as a priority for providing a major public open space, consistent with the Eastrail Framework Plan’s vision of creating a “major mixing zone” at this location.

Open space in Wilburton can be achieved through creative solutions, such as incorporating pedestrian and landscaped portions of access corridors. The latest draft of the LUCA includes updates allowing the entire width for active transportation and pedestrian corridors to count toward open space requirements if it connects to an open space of at least 1,500 square feet—reduced from the previous 3,000-square-foot requirement. Open spaces may also include public plazas and landscaped areas outside of access corridors. This approach establishes a hierarchy of open spaces while offering flexibility through a departure process and options for off-site park dedications.

Since November 6, the LUCA has been revised to expand allowances for double-counting and providing credit within the amenity incentive program. Any amount of open space now qualifies for FAR credit, whereas the previous LUCA version permitted double-counting only under limited circumstances and offered FAR increases solely for open space provided beyond the minimum requirement.

A fee in-lieu program for open space is not recommended for Wilburton because the proposed LUCA already provides significant flexibility to meet open space requirements. Introducing a fee in-lieu option would necessitate a strict, non-departable open space standard. Additionally, revenue from such a program would need to be spent within a specific timeframe to remain legally compliant, raising concerns about the feasibility of collecting sufficient funds in time. Finally, there is uncertainty about stakeholder support for an additional fee when the current LUCA already offers ample pathways to fulfill open space requirements.

Can we offer an open space exemption or reduction for properties when they are proximate to existing City parks?

Using the City Parks Department’s standard of a 1/3-mile walking distance, staff analyzed the area and determined that nearly all areas within the TOD are well-served by Eastrail and its planned connections. Given the accessibility to existing and future parks and trails, staff does not recommend further flexibility and reductions to the open space requirements beyond what is already proposed in the LUCA.

LUCA Topic Area: Building Design

Tonight’s study session will focus on building design topics, including building heights, Floor Area Ratio (FAR), floorplate sizes, land uses, including non-conforming uses/sites/structures, and off-street parking. 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 the topic area of building design.

Building Design: building height, FAR, floorplate sizes, land uses, including non-conforming uses/sites/structures, and off-street parking
Relevant Wilburton Policies
S-WI-33. Allow for the tallest buildings along Interstate-405 and around the Grand Connection, transitioning down in height toward the east.
S-WI-35. Provide for ground floor uses and publicly accessible open spaces that support an engaging pedestrian experience.
S-WI-36. Use appropriate vehicle and bicycle parking supply and requirements to reflect trail and transit proximity and access, and local access needs.

S-WI-38. Accommodate the continued operation of existing service and commercial uses and allow new service and commercial businesses that are compatible with planned land uses.

S-WI-40. Provide flexibility toward developing building floorplates that support a diverse business mix within higher density development.

S-WI-52. Provide for housing units and amenity spaces that are directly accessible at ground level.

S-WI-74. Allow flexibility for buildings to provide for activation along the building’s frontage zone.

S-WI-76. Use design guidelines and standards that promote a high-quality, attractive, and safe pedestrian environment with ample access to sunlight, air, and weather protection.

S-WI-77. Support a wide range of active uses and gathering spaces, prioritizing these opportunities fronting the Eastrail corridor and the Grand Connection.

S-WI-80. Use design guidelines and standards for development within and adjacent to the Eastrail corridor that consider unique characteristics, topography, and different user groups along the corridor.

Proposed Land Use Code Amendments

Building height and floor area ratio (FAR)

Context

Both draft LUCA options A and B include a voluntary program that allows developers to exceed the "base FAR" and/or "base height" to achieve additional FAR and height in exchange for providing public benefits. The proposed maximum building heights and FARs for options A and B are the same. A critical step in realizing the public benefits through a mandatory affordable housing approach (Option A) or a voluntary incentive zoning program (Option B) is calibrating the base FAR. The discussion around the proposed “base building height” and “base FAR” is scheduled for the January 8 study session.

The City is planning for an additional 35,000 housing units and 70,000 jobs by the year 2044. The Wilburton TOD presents a great opportunity to increase and diversify the City's overall housing stock and contribute towards balancing job and housing growth. The 300-acre TOD area is expected to add 4,900 jobs and 4,000 housing units by 2044. This represents 7% of the job growth for the city and 12% of the housing growth for the city over this planning period. The total capacity in the Wilburton TOD created by the LUCA and rezone will provide for an additional 12.0 million square feet of commercial development and would include an additional 14,800 housing units and space for an additional 35,500 jobs. This significant rezone allows for opportunities to generate affordable housing, attractive open space, and other public amenities to serve residents and implement the Wilburton Vision.

Urban Form Framework

Several key tenets of the City’s overall urban form planning framework are reinforced in the draft LUCA, including knitting together abutting land use districts with transitions that are sensitive to and complement the surrounding context. For example, the proposed building height layout in the

Wilburton TOD envisions the tallest towers rising in the center of the TOD along the NE 6th Street alignment, where the Grand Connection is proposed to extend from Downtown to Eastrail (Urban Core (UC) Land Use District), surrounded by a band of towers of decreased heights that transition to BelRed and East Main (Mixed-Use Highrise (MU-H) Land Use District), and followed by buildings of lower heights along Lake Bellevue, a mapped critical area, and at the edges of the Wilburton TOD as the Land Use Districts transition to lower density residential areas to the east (Mixed-Use Residential Midrise (MUR-M) and Mixed-Use Midrise (MU-M) Land Use Districts). This pattern provides graceful transitions to the lower-density areas in the City, including adjacent single-family neighborhoods, and is intended to cohesively organize the distribution of buildings by height in the TOD.

Concentrating the tallest and highest FAR allowances in the urban core aligns with the vision of creating a dense, high-rise district anchored by proximity to transit, the Grand Connection, and the Eastrail. This intensity promotes the greatest mix of housing, employment, and retail opportunities, fostering a thriving pedestrian-oriented and transit-friendly environment. The proposed FAR limits are thoughtfully matched to building heights and locations to support Wilburton’s vision. They balance the need for density in transit-rich areas with transitions to adjacent neighborhoods, ensuring economic feasibility, architectural proportion, and alignment with our jobs and housing goals for the area.

Proposed building height and FAR limits:

- Urban Core (UC):
 - Maximum height: 450’
 - Maximum FAR: 10 (nonresidential); unlimited (residential)
- Mixed-Use Highrise (MU-H):
 - Maximum height: 250’
 - Maximum FAR: 8 (nonresidential); unlimited (residential)
- Mixed-Use Midrise (MU-M):
 - Maximum height: 100’
 - Maximum FAR: 6 (nonresidential); 6 (residential)
- Mixed-Use Residential Midrise (MUR-M):
 - Maximum height: 100’
 - Maximum FAR: 6 (nonresidential); 6 (residential)

Floor plate sizes and setbacks

The proposed floor plate framework in Wilburton provides for flexible building design while addressing how pedestrians experience a tower and how it is viewed from a distance. This framework creates two distinct parts of a high-rise building – base (or podium) and tower – through varied floor plate sizes at different points of the building height and with setbacks in the base for some locations. The pedestrian experience is emphasized at the base, with setbacks as a defining element for the adjacent public realm along Eastrail and existing public rights-of-way. As a building gets taller, the floor plates reduce in size to form slender towers compared to its base. This framework enhances the image of the City through porosity of natural light, air, and the promotion of sky views. The maximum floor plate sizes and building setbacks would apply only to towers, which are defined in the LUCA as any building with a minimum height of 100 feet or greater.

Proposed floor plate maximums and setback dimension:

- Maximum floor plate above 55' where a building exceeds 100':
 - Nonresidential: 30,000 gross square feet/floor
 - Residential: 16,000 gross square feet/floor
- Minimum setback requirement along Eastrail or existing public rights-of-way:
 - 15-foot setback

The following exceptions are proposed:

1. The proposed LUCA would allow larger floorplates and mechanical screening height for life science uses, recognizing the unique spatial needs of this industry. As the comprehensive plan policies and land use designations were under review, the Commission expressed interest in fostering life science development through flexible strategies rather than creating a separate medical office designation. This floor plate size approach supports the adaptability needed to accommodate these highly specialized facilities.

Life science operations often rely on large, intricate equipment such as fume hoods, biosafety cabinets, and autoclaves, which require significant floor space for safe operation, maintenance, and accessibility. Additionally, the advanced infrastructure needed for laboratory environments—such as HVAC systems, plumbing, and electrical configurations—demands ample space and frequently necessitates taller mechanical screening allowances and open floor plans.

To better support life science uses, the proposed LUCA will include a new definition for this use:

Life science uses. Facilities, such as laboratories, and ancillary offices dedicated to development, research, and production of biological and biotechnical discoveries and products.

2. To reinforce the eco-district concept for Wilburton the proposed LUCA will encourage mass timber construction by providing an exemption from the floor plate limits and setback requirements. Mass timber components are prefabricated, enabling faster construction times and less on-site waste. Requiring building setbacks or floorplate restrictions at various points of a mass timber building require intricate, often custom-made connection details to handle the angles and transitions, which increases waste and undermines the sustainability benefits of timber construction.

Mass timber construction is defined in the proposed LUCA as:

Mass timber construction. A method of building that primarily utilizes engineered wood products, including, but not limited to, cross-laminated timber (CLT), glued-laminated timber (glulam), nail-laminated timber (NLT), dowel-laminated timber (DLT), and laminated veneer lumber (LVL), as the main structural elements. These products are designed to provide enhanced strength, stability, and fire resistance compared to traditional timber. Mass timber construction is characterized by the use of these prefabricated wood components in walls, floors, and roofs, offering an efficient, sustainable alternative to conventional steel and concrete construction

3. For small sites, greater flexibility is proposed to depart from the minimum setback dimension when additional building facade modulation is provided as an alternative. Small sites have

inherently constrained footprints and often struggle to maximize their building envelope due to their limited size. Additionally, small parcels are often costlier to redevelop at higher densities compared to larger sites, with higher costs per square foot for construction. Allowing flexibility in setback requirements can reduce these costs by optimizing usable floor area, thereby improving a project's financial viability.

Small sites is defined in the proposed LUCA as:

Small site. A lot in a Mixed-Use Land Use District as defined in LUC 20.10.398 and in existence prior to January 1, 2025 that is less than or equal to 40,000 square feet in area and corresponds to the project limit within which the small site is located. This definition does not apply to lots less than 40,000 square feet in area that are aggregated into a project limit that is greater than 40,000 square feet.

Permitted land uses and non-conforming uses/sites/structures

The proposed LUCA introduces greater flexibility in the approach to permitted uses. Traditionally, the City has identified all permitted uses within a district. However, the LUCA adopts a more adaptable method by specifying only a limited set of uses that are either prohibited outright or permitted through a conditional use process. These restricted uses are limited to those deemed incompatible with the urban, walkable vision for the Wilburton Transit-Oriented Development (TOD) area. All other uses are allowed by default.

The LUCA will also rely on the citywide non-conforming provisions in the LUC, which are found in [LUC 20.20.560 Nonconforming structures, uses and sites](#). It is anticipated that most sites within the Wilburton TOD area will be classified as “nonconforming” once the proposed LUCA is adopted. A nonconformity can exist in the structure, the land use, or the site itself, meaning the development does not fully align with current Land Use Code standards due to regulatory changes enacted after its initial development.

Likely the most common nonconforming condition in Wilburton will relate to site development. The general nonconforming provisions allow a development to continue operating without requiring immediate compliance, minimizing disruption to existing businesses. When a development is proposing changes, instead of requiring full compliance with the TOD-aligned land use code upfront, the code uses a proportional compliance model. This ensures that updates to the site (e.g., expansions, remodels) align incrementally with TOD goals without placing undue financial burdens on existing businesses.

For example, existing auto dealerships and drive-through establishments may benefit from exceptions such as the ability to reconfigure parking areas within the existing paved surface, allowing for operational improvements without triggering compliance. This provides flexibility for businesses to adapt within their current footprint, maintaining functionality. If existing businesses are not expanding or undergoing major remodels (i.e., the remodel budget exceeds 100% of the replacement value of the structure), they are not required to comply with the new land use standards.

The proposed LUCA achieves a balance between preserving the viability of existing developments and supporting the gradual transformation of the area into a dense, transit-oriented community. This approach appropriately accommodates the continued operation of existing structures, uses, and sites

in Wilburton while setting clear thresholds for when compliance is required, ensuring that any significant investment in a development aligns with TOD priorities, like pedestrian-friendly infrastructure or aesthetic improvements.

Off-street parking

At the March 27 study session, staff initially proposed no minimum parking requirements for the following reasons:

1. Transportation accessibility:
 - With four light rail stations within a 10-minute walk, residents, workers, and visitors have unparalleled access to high-capacity transit, reducing dependency on personal vehicles.
 - The presence of Eastrail through the neighborhood encourages active transportation modes, such as biking and walking, further reducing the need for vehicle ownership.
2. Environmental sustainability:
 - Lowering or eliminating parking minimums encourages fewer car trips and supports transit-oriented development and the eco-district concept for Wilburton.
 - Parking lots and structures occupy valuable urban space that could be used for housing, parks, or other amenities that benefit the community.
3. Affordability and housing production:
 - Parking requirements increase construction costs, which are often passed on to tenants or buyers. Removing these requirements can result in more affordable housing.
 - Developers can tailor parking provisions to market and lender demand, optimizing resources and creating more housing options.
4. Policy precedent and urban planning trends:
 - Cities across the U.S., such as Spokane, Seattle, Portland, San Francisco, Minneapolis, and San Jose have successfully removed parking minimums in transit-rich areas with positive results.

While Wilburton is poised to benefit from exceptional transit and trail access, many residents and businesses may still rely on vehicles, especially during the early stages of light rail operations extending to Seattle. Also, much of the neighborhood still has car-oriented infrastructure, making some parking necessary for integration with regional travel patterns. For these reasons, the proposed LUCA will include a 75% reduction to the citywide minimum required parking for Wilburton with a pathway to further reduce parking based on a parking study. This reduction request would be made by the project applicant and based on a parking study conducted by a qualified expert, demonstrating that the project can provide sufficient parking to meet its specific needs without negatively affecting nearby uses or streets. The LUCA will also allow and encourage shared parking facilities that recognize differences in daytime versus evening parking demand.

By requiring some minimum parking while encouraging shared use, the City can ensure sufficient parking to support current needs without overbuilding, while also fostering efficient land use and reducing the urban footprint of parking. This approach balances the realities of current behavior with aspirations for a more transit-oriented future.

Public Engagement

Staff has executed a public engagement plan with three modes of outreach to ensure that community members and neighbors, property owners, and all stakeholders and interested parties have the opportunity to stay informed and to provide comments.

- A. Process IV Requirements. The LUCA process is following the Chapter 20.35 LUC procedural requirements to provide opportunities for public comment.
- B. Direct Engagement and Feedback. Dialogue with stakeholders has been ongoing. A community meeting was held on November 21 to share more information about the LUCA and gather input. Community and stakeholder input has informed the draft LUCA completed in October, as well as the modified draft LUCA included as Attachment A. Stakeholders include the following groups:
 - General public
 - Wilburton Property Owners Group
 - Bellevue Chamber
 - Bellevue Development Committee Sub Team, comprising of Wilburton property owners, affordable housing groups, Bellevue Chamber, and other interested parties.
- C. Online Presence. Staff is continuing to update the Wilburton webpage to inform the public about this LUCA. The latest draft and comment tracker are available on the webpage and will be updated as the LUCA progresses.

ATTACHMENT(S)

- A. Strike-Draft of Proposed Wilburton LUCA