



Bellevue Planning Commission

February 26, 2025

PLANNING COMMISSION STUDY SESSION ITEM

SUBJECT

Public Hearing 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 be asked to hold a public hearing to 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 build upon existing citywide Land Use Code (LUC) chapters and sections, modifying them as necessary to support future development within a newly established category of land use districts called Mixed-Use Districts. This LUCA will also introduce Part 20.25R of the LUC, tailored specifically to the Wilburton TOD area, a 300-acre district envisioned for a dynamic, pedestrian-oriented urban environment.

Over the past year, the LUCA has been reviewed in a series of study sessions, beginning in February 2024, each focusing on different topic areas of the LUCA. These discussions have led to tonight’s meeting, where the Planning Commission will be asked to hold a public hearing on the proposed LUCA.

Following the public hearing, the Planning Commission may recommend the LUCA to the City Council at any time. Staff anticipates returning in March for the Commission’s recommendation.

WILBURTON LUCA PLANNING COMMISSION SCHEDULE

	LUCA Topic Areas
<input checked="" type="checkbox"/>	<u>Study Session 1 (February 14, 2024): Overview of LUCA Structure</u> <ul style="list-style-type: none"> Summary of LUCA purpose and structure
<input checked="" type="checkbox"/>	<u>Study Session 2 (March 27, 2024): Transportation, Streets & Blocks, Parking</u>
<input checked="" type="checkbox"/>	<u>Study Session 3 (September 11, 2024): LUCA Elements Overview and Status Update</u>

<input checked="" type="checkbox"/>	<u>Study Session 4 (November 6, 2024): Site Organization</u>
<input checked="" type="checkbox"/>	<u>Study Session 5 (December 11, 2024): Building Design</u>
<input checked="" type="checkbox"/>	<u>Study Session 6 (January 22): Inclusive TOD</u>
<input type="checkbox"/>	<u>Public Hearing (February 26):</u> <ul style="list-style-type: none"> • Required Public Hearing
<input type="checkbox"/>	<u>Study Session 7 (March 26):</u> <ul style="list-style-type: none"> • 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, 2024.

LUCA Draft Development Approach

Since May 2024, staff have published and shared five drafts of the LUCA, each shaped by valuable feedback from stakeholders, the general public, and the Planning Commission. These drafts focus on refining strategies to advance affordable housing in Wilburton, thoughtfully balancing mandatory requirements, voluntary incentives, and additional redevelopment priorities such as streets and circulation, open space, and building design. Each new version has built on prior input, with updates clearly highlighted to ensure transparency and facilitate review. The iterative process reflects an ongoing commitment to stakeholder collaboration and thoughtful policy development that would ideally result in a final draft that is both effective and responsive to our community’s needs.

Planning Commission Review

On January 22, the Planning Commission reviewed recommendations related to the topic of “Inclusive TOD,” which proposed two affordable housing approaches for the TOD:

- Option A (staff recommendation): a requirement for projects to provide affordable housing
- Option B: a voluntary incentive where projects can provide affordable housing to increase height and FAR

The planning commission also reviewed amenity incentive program options that would apply to both Option A and Option B.

During the study session, Commissioners provided feedback on the affordable housing strategies and amenity incentive options and directed staff to schedule a public hearing for February 26. The Commission also requested additional analysis on specific requests made on January 22 by Wilburton TOD property owners and the Eastside Housing Roundtable—a group primarily composed of representatives from the Bellevue Chamber of Commerce and the Housing Development Consortium.

This memo includes information and analysis related to these stakeholder requests. A staff report describing the background, review process, and this LUCA’s compliance with the decision criteria, is included with this Memorandum as Attachment A. A strike draft of the proposed LUCA Option A (mandatory approach) is provided as Attachment B, and a strike-draft of the proposed LUCA Option B (voluntary approach) is included as Attachment C.

Public Hearing

The purpose of this public hearing is to gather input on the proposed LUCA in general, with a focus on four key topic areas identified by the Commission during previous study sessions:

1. **Access Corridors:** Evaluating potential further reductions to access corridor and sidewalk widths to improve project feasibility.
2. **Off-Street Parking:** Reviewing options for minimum off-street parking requirements.
3. **Small Sites:** Exploring additional ways to better support residential development on sites smaller than 40,000 square feet.
4. **Affordable Housing:** Analysis related to the Eastside Housing Roundtable Requests

Additionally, the Eastside Housing Roundtable has requested clarification on requirements for affordable unit finishes, appliances, and unit placement within buildings. These details will be addressed through a Director’s Rule, which allows for public input and is a more appropriate mechanism for this level of specificity.

The Roundtable has also requested updates to the City’s Multifamily Tax Exemption (MFTE) program. As MFTE policies are reviewed by City Council and amendments to this program are managed by the Community Development Department and the Office of Housing, this request has been forwarded to those departments. It will be reviewed this year alongside other potential MFTE updates.

Topics for Discussion

To support the Commission’s review of the four key topics—access corridors, off-street parking, small sites, and affordable housing—this section provides relevant information, analysis, and available options for each topic.

Topic 1: Access Corridors

The current draft corridor approach balances flexibility, cost efficiency, and the need for safe, livable spaces in the Wilburton TOD and represents significant width reductions and developer flexibility since the access widths were first introduced to the Planning Commission on March 27, 2024.

The access corridors are designed to support significant growth, as the TOD will have the capacity to accommodate 12 million square feet of commercial development, 14,800 housing units, and 35,500 jobs. The proposed access corridors, which will be private (except for Local Streets), address developer feedback to maximize site efficiency and reduce costs by allowing the following flexibilities:

- The ability to construct a garage underneath, and a building over via cantilevers, or across via 75-foot-wide habitable building segments, access corridors.
- Double-counting portions of these corridors toward open space requirements.

- Exempting sites between I-405 and 116th Ave NE from providing access corridors and increasing the maximum size for exempt sites from 90,000 to 100,000, and now 105,000 square feet.
- Earning FAR through the amenity incentive program by providing these required corridors.
- Expanding the type of access options that may frame a block to include smaller shared-use paths (14-foot corridors) and allowing active transportation corridors to function as fire lanes.

Even with these significant adjustments, property owners are now seeking additional reductions to corridor width requirements. A comparison of **Option A** (the current draft LUCA), **Option B** (the property owners’ requests), and **Option C** (potential adjustments) is provided below, with staff analysis and recommendations highlighted in green.

Access Type: Local Street		
Option A: Current Draft (recommended)	Option B: Property Owner Request	Option C: Potential Adjustment
67-foot corridor: <ul style="list-style-type: none"> • (2) 10’ vehicle travel • (2) 6” curb • (2) 8’ parking • (2) 5’ amenity zone • (2) 10’ sidewalk 	<u>59-foot</u> corridor: <ul style="list-style-type: none"> • (2) 10’ vehicle travel • (2) 6” curb • (2) 8’ parking • (2) 5’ amenity zone • (2) <u>6’ sidewalk</u> 	<u>51-foot</u> corridor: <ul style="list-style-type: none"> • (2) 10’ vehicle travel • (2) 6” curb • (2) 8’ parking • (2) 5’ amenity zone • (2) 10’ sidewalk
<p>Analysis: Staff recommend Option A and do not support Option B, which would reduce sidewalk widths on Local Streets from 10 feet to 6 feet. Bellevue has formally endorsed the NACTO Urban Street Design Guide and actively seeks opportunities to implement and align with this guidance as we update codes and policies. The city heavily relies on best practices from NACTO to inform multimodal and pedestrian-friendly design.</p> <p>The NACTO Urban Street Design Guide recommends sidewalk widths of 8 to 12 feet in downtown and commercial/mixed-use areas to enhance safety and pedestrian activity. Similarly, the WSDOT Design Manual advises 10-foot sidewalks in urban cores, with additional width near storefronts to prevent door conflicts and support active transportation. For comparison, Downtown Bellevue requires sidewalk widths ranging from 7 to 15 feet, with most sidewalks required to be 10 or 11 feet wide.</p> <p>Well-designed sidewalks that are spacious, well-lit, shaded, and seamlessly integrated with businesses enhance walkability, economic vitality, and advance the Wilburton Vision.</p> <p>Option C proposes reducing the corridor width by eliminating on-street parking requirements. This adjustment is not advisable, as businesses—particularly small retailers, restaurants, and service providers—benefit from adjacent parking that supports quick customer turnover and convenient access. Additionally, loading needs for businesses, restaurants, and mixed-use developments are better met when on-street parking is available as a flexible option for deliveries. Without designated curbside spaces, delivery trucks, ride-share vehicles, and taxis often stop in travel lanes, creating congestion and safety hazards.</p>		

Access Type: Flexible Access Corridor		
Option A: Current Draft	Option B: Property Owner Request	Option C: Potential Adjustment (recommended)
51-foot corridor: <ul style="list-style-type: none"> • (2) 10' vehicle travel • (2) 6" curb • (2) 5' amenity zone • (2) 10' sidewalk 	<u>37-foot</u> corridor: <ul style="list-style-type: none"> • (2) 10' vehicle travel • (2) 6" curb • <u>(1) 4' amenity zone</u> • (2) <u>6' sidewalk</u> 	<u>47-foot</u> corridor: <ul style="list-style-type: none"> • (2) 10' vehicle travel • (2) 6" curb • (2) 5' amenity zone • (2) <u>8' sidewalk</u>
<p>Analysis: Staff do not support Option B, which reduces sidewalk widths from 10 feet to 6 feet while also shrinking and eliminating a landscape planter area (amenity zone). Instead, staff recommend Option C, which preserves two 5-foot planters, consistent with standards in Downtown, BelRed, and East Main, and ensures sufficient sidewalk space to support walkability.</p> <p>Option C reinforces the TOD's vision as a sustainable district by integrating wide sidewalks and landscape areas, which work together to expand tree canopy, mitigate urban heat, and improve stormwater management. These elements enhance environmental resilience and contribute to a more comfortable, pedestrian-friendly public realm. The 8-foot sidewalk supports pedestrian mobility and safety, and aligns with the minimum width recommended in the NACTO Urban Street Design Guide.</p>		

Access Type: Active Transportation Corridor		
Option A: Current Draft (recommended)	Option B: Property Owner Request	Option C: Potential Adjustment
30-foot corridor: <ul style="list-style-type: none"> • 20' paved path • (2) 5' amenity zone 	<u>20-foot</u> corridor: <ul style="list-style-type: none"> • 20' paved path • <u>No amenity zone</u> <p><u>Purpose: May be used for "back of house" service, accommodating fire lane, garbage, and incidental loading</u></p>	<u>20-foot</u> corridor: <ul style="list-style-type: none"> • 20' paved path • <u>No amenity zone</u> <p><u>Purpose: Restrict to Active Transportation and fire lane only</u></p>
<p>Analysis: Staff recommend Option A and do not support Option B, which eliminates a dedicated landscape area and allows "back of house" services within what should be an Active Transportation Corridor.</p> <p>The initial LUCA required a 40-foot corridor with no fire lane option. However, to balance functionality with an inviting public realm, the current draft (Option A) proposes a 30-foot corridor that accommodates both pedestrians and emergency access with landscaping.</p> <p>Option A preserves the corridor as a key pedestrian and multimodal route, aligning with transit-oriented development principles. It balances function and aesthetics by:</p> <ul style="list-style-type: none"> • Maintaining public space for seating, lighting, and landscaping, creating a more vibrant and inviting corridor. 		

- Ensuring adequate width for comfort and wayfinding, with five feet on either side (or ten feet on one side) for amenities that enhance walkability and usability.

Option B would reduce the corridor to 20 feet and allow waste collection and incidental loading, fundamentally altering its character and function. Given the density of anticipated TOD projects, service trips alone would be significant. For example, in Downtown Bellevue, trash pickup for a dense residential building without a compactor can require 200 trips per week, or 10+ trucks per day even with a compactor—not including additional trips for loading, maintenance, and operations.

A corridor dominated by service vehicles is no longer an active transportation corridor in practice. The frequent presence of waste collection and service activities would undermine the pedestrian-oriented character, reducing safety, comfort, and usability.

Access Type: Shared-Use Path		
Option A: Current Draft (recommended)	Option B: Property Owner Request	Option C: Potential Adjustment
Option added in October 2024 draft <ul style="list-style-type: none"> • 14-foot paved path 	<u>10-foot</u> paved path	N/A
<p>Analysis: Staff recommend Option A and do not support Option B, as it is unsafe and does not meet minimum standards. Previously called the “Pedestrian Corridor,” this access type was added to the current draft (Option A) in response to stakeholder requests for smaller access types to frame a block. It has been renamed “Shared-Use Path” to better reflect its purpose of providing pedestrian and bicycle access through and between larger blocks. The minimum standard for a multi-purpose path is 14 feet.</p>		

Commercial Driveways & Sidewalks on Existing City Streets		
Option A: Current Draft	Option B: Property Owner Request (Recommended)	Option C: Potential Adjustment
Width varies and the decision to require a sidewalk will depend based on a specific project design. <ul style="list-style-type: none"> • 10-foot sidewalk, when required • 10-foot sidewalk for existing city streets 	Width varies and the decision to require a sidewalk will depend based on a specific project design. <ul style="list-style-type: none"> • <u>6-foot</u> sidewalk, when required • 10-foot sidewalk for existing city streets 	Same as Option B.
<p>Analysis: Staff recommends Option B, which reduces sidewalk widths on commercial driveways from 10 feet to 6 feet (where sidewalks are required) and maintains a 10-foot sidewalk width for existing public streets like NE 4th, NE 8th, 116th Ave NE, 121 Ave NE. Since commercial driveways primarily serve smaller sites rather than framing entire blocks, a reduced sidewalk width is appropriate for these locations.</p>		

Topic 2: Off-Street Parking

At the March 27 study session, staff proposed eliminating minimum parking requirements, citing Wilburton’s exceptional transit access, environmental benefits, and alignment with urban planning trends. With four light rail stations within a 10-minute walk and Eastrail and Grand Connection encouraging active transportation, dependency on personal vehicles is expected to decrease. Removing parking minimums supports transit-oriented development, reduces urban space dedicated to parking, and can lower housing costs.

Recognizing that some residents and businesses will still rely on vehicles, particularly in the early phases of light rail expansion, the proposed LUCA includes a 75% reduction in citywide parking minimums for Wilburton, with the option for further reductions based on a parking study. Applicants can request reductions if a qualified expert demonstrates sufficient parking without negatively impacting nearby uses. The LUCA also encourages shared parking to optimize space based on differing daytime and evening demand. This approach ensures parking availability while supporting a long-term shift toward transit-oriented development.

Minimum Parking Requirement	
Option A: Current Draft (recommended)	75% reduction to the citywide minimum required parking
Potential Adjustment	No minimum parking

Topic 3: Small Sites

Developing smaller sites presents unique challenges in maximizing their full building envelope due to spatial constraints and higher costs associated with high-density redevelopment. Compared to larger sites, smaller projects have fewer opportunities to leverage amenity incentives for additional floor area. Amenity-based bonuses—such as open space and access corridors—require more physical space, which is often impractical on smaller sites.

Given these limitations, staff recommend that residential projects on sites 40,000 square feet or smaller prioritize the green building incentive and the provision of affordable housing to unlock their full development capacity (height and FAR). By focusing on sustainability and housing affordability, these projects can make meaningful contributions to the Wilburton vision, ensuring that smaller developments support broader community goals while remaining financially viable.

Small Site Flexibility	
Option A: Current Draft	No amenity incentive flexibility for small sites
Potential Adjustment	Allow residential projects on small sites to achieve maximum development capacity through: <ul style="list-style-type: none">• Green building incentive• Provision of affordable housing

Topic 4: Affordable Housing

The following analysis relates to the Eastside Housing Roundtable’s requests from the January 22 study session.

Topic 4a: Option for off-site performance of affordable housing

The February 2025 LUCA draft now includes an option to satisfy affordable housing requirements off-site, as requested by the Roundtable. The proposed approach allows for off-site performance and will vary based on a receiving sites’ proximity to transit or bike access.

- **Tier 1 (equal requirement):** Sites within ½ mile of a light rail or bus rapid transit station can receive affordable housing obligations.
- **Tier 2 (deeper affordability requirement):** Sites near frequent transit or nonmotorized facilities (e.g., bike lanes) but not near light rail or bus rapid transit must provide units at a deeper level of affordability.

This approach ensures affordable housing is strategically placed while maintaining equitable access to transit.

Topic 4b: Affordable housing fee-in-lieu amount

Under the proposed mandatory affordable housing approach, both residential and commercial developments have the option to pay a fee in lieu instead of providing affordable housing units within the project. This fee is assessed on all non-exempt floor area within a project.

Some stakeholders are advocating for a reduction in the fee amount, arguing that lower fees would support development feasibility. Below is a comparison between the proposed fees and the fee levels suggested by stakeholders, along with staff's analysis of the potential impacts of these variations.

Affordable Housing Fee			
Proposed Fees		Stakeholder Request	
Residential Fee:	Commercial Fee:	Residential Fee:	Commercial Fee:
<ul style="list-style-type: none"> • Urban Core: \$18 • All other districts: \$13 	<ul style="list-style-type: none"> • All districts: \$24 	<ul style="list-style-type: none"> • Urban Core: <u>\$13</u> • All other districts: \$13 	<ul style="list-style-type: none"> • All districts: <u>\$16.50</u>
<p><u>Residential fee analysis:</u> Staff evaluated fee options based on five factors:</p> <ol style="list-style-type: none"> 1. The cost of developing affordable housing 2. Findings from the Nexus and Proportionality study 3. The public subsidy required to bridge the affordability gap 4. Developer investment loss per square foot for including affordable units 5. A comparison of Bellevue’s fees to those in neighboring cities <p>Additional considerations include regional competitiveness, the effectiveness of existing subsidy programs, broader citywide affordable housing goals (such as addressing the need for lower Area Median Income (AMI) thresholds), and the long-term feasibility for developers. A structured, data-driven approach will help ensure that the in-lieu fee supports affordable housing production without unduly burdening market-rate development.</p> <p>Factor 1: Cost to Build Units The estimated cost to build new affordable housing for a midrise project in the TOD is \$314 per square foot or more, not including land acquisition. While the proposed fee is not intended to fully replace the cost of constructing affordable units, this figure underscores the reality that housing</p>			

development, particularly at affordable rates, is inherently expensive. Someone must cover these costs, and without adequate private sector participation, the burden falls disproportionately on public subsidies, limiting the city's ability to meet housing needs at scale.

Factor 2: Nexus and Proportionality Analysis

The Nexus and Proportionality study establishes the legally justifiable maximum fee that can be charged to new residential developments. For Wilburton, the study identifies the following maximum fee rates for rental housing:

- Urban Core: \$31.63 per square foot
- Other Districts: \$26.31 per square foot
- Ownership Housing: (Higher than rental rates, specific figures not provided here)

These figures define the upper limit of fees based on the relationship between new development and the demand it generates for affordable housing.

Factor 3: Local Subsidy Needed to Bridge the Affordability Gap

Recent projects funded through the ARCH Housing Trust Fund required a subsidy of approximately \$150,000 per unit for a market-rate rental unit to be made affordable to a household earning 80% of the area median income.

To translate this into a per square foot fee, the necessary fee level falls between \$15 and \$20 per square foot to sufficiently address the affordability gap for 80% AMI units. Achieving deeper affordability requires a higher fee amount. This figure also varies based on:

- Unit size and location: Smaller units require a lower total buy-down, while larger units or those in high-cost locations may need more.
- Other available investments: Projects leveraging federal, state, or local funding sources, such as Low-Income Housing Tax Credits (LIHTC), Washington State Housing Trust Fund (HTF) or Multifamily Tax Exemption (MFTE) programs, may require a lower local in-lieu fee contribution.

Factor 4: Developer Investment Value Loss Per Square Foot

Staff analyzed the rent gap between market-rate units and those affordable at 80% AMI to understand the developer's potential return on investment (ROI) loss when providing 10% of a project's units at 80% AMI. The analysis calculated the annual rent for market-rate units using prototype data from the city's consultant-provided pro forma, which was vetted with stakeholders. This was then compared to affordable rent levels. The difference, or annual rent gap, was divided by an assumed capitalization rate of 5.5% (a metric used by developers to assess the potential return on investment for a development project) to determine the total value loss over the investment period. This value represents the revenue developers forgo by including affordable units.

To convert this loss into a per-square-foot amount, the total rent loss plus the capitalization rate adjustment was divided by the building's total square footage. This resulted in estimated losses of approximately \$13 per square foot for mid-rise developments and \$18 per square foot for high-rise projects. The idea would be to capture this investment loss into an upfront contribution for affordable housing if on-site performance is not desirable for a developer.

Factor 5: Neighboring Jurisdictions

Cities such as Seattle, Kirkland, and Redmond have affordable housing fee options for certain projects. Examining how Seattle sets their in-lieu fees provides insight into regional best practices and development market competitiveness.

In Seattle, fees vary widely based on district and use type, with most areas requiring fees between \$10.50 and \$18.55 per square foot for residential projects within similar districts as Wilburton.

Based on these five factors, a proposed in-lieu fee range of \$13–\$18 per square foot is reasonable, competitive, and justifiable. This range ensures Bellevue remains an attractive location for investment while generating meaningful funding for affordable housing.

Commercial fee analysis:

Unlike residential development, which directly increases housing supply, commercial development impacts the housing market by directly generating new employment, thereby increasing demand for housing.

Using the same five evaluation factors applied to residential fees, staff analyzed a reasonable in-lieu fee rate for commercial development. This analysis considered Downtown Bellevue’s proximity to the TOD as the city’s primary job center and the LUCA’s intent to incentivize residential development to help meet housing needs.

In comparable districts, Seattle’s commercial fee ranges from \$14.31 to \$28.61 per square foot. Based on a unit replacement cost of \$314 per square foot, the nexus study supporting a fee of \$105.02 per square foot, and an estimated affordability gap of \$15 to \$20 per square foot, staff recommend a \$24 per square foot in-lieu fee. This figure ensures new commercial development contributes to meeting housing needs while remaining in line with regional expectations and market feasibility.

Topic 4c: Catalyst Program

Under the proposed mandatory affordable housing approach, stakeholders are requesting a catalyst provision to better support all development in the near-term. While economic conditions are currently challenging for development across the region, Wilburton is uniquely positioned for redevelopment once the market improves. Decades of public investment have already laid the foundation for growth in the TOD, including light rail now operational, Eastrail investments, the NE 4th Street extension completed in the last decade, the Grand Connection, and seamless proximity to BelRed and Downtown.

A precedent for a catalyst program in Bellevue was BelRed in 2009, implemented during the Great Recession when the light rail alignment was uncertain, and the area lacked infrastructure to support transit-oriented development. Wilburton is in a vastly different position. Unlike areas that require a catalyst program to spur investment, Wilburton already has the infrastructure and transit access needed to attract development when conditions are right.

Below, we provide an analysis of the potential impacts of the requested catalyst program and a potential adjustment if the Commission would like to provide such a program in Wilburton.

Catalyst Program	
Stakeholder Request	<p>Catalyst program to waive affordable housing fees and requirements for:</p> <ul style="list-style-type: none"> • The first 2,000 residential units, representing half of the projected housing within the Wilburton TOD over the next 20 years. • The first 800,000 square feet of commercial development.
Potential Adjustment	<p>Catalyst program to phase-in affordability requirements as follows:</p> <ul style="list-style-type: none"> • 5% set-aside requirement for first 500 residential units. • 10% set-aside requirement for remaining units. • 25% commercial fee reduction for the first 600,000 square feet of commercial development, or first year (whichever is later). • 50% commercial fee reduction for 500,000 square feet of life science uses (separate from commercial fee reduction above) • A “look back” on fees and how the catalyst program is performing after a five-year period or sooner depending on how development is progressing.
<p>Analysis: Wilburton’s high desirability and strong market demand indicate that development will likely proceed even without the waivers or reduced requirements proposed in the adjustment option.</p> <p>While the stakeholder request aims to incentivize early development, waiving affordable housing fees and requirements at this scale presents several risks and drawbacks, including a significant loss of affordable housing production and opportunity in the TOD.</p> <p>Exempting 2,000 units—half of the projected 20-year supply—from affordability requirements would drastically reduce the number of income-restricted units, undermining the city’s long-term housing goals. Once these units are built without affordability requirements, the opportunity to secure affordable units is permanently lost.</p> <p>New development in Wilburton will benefit from public investments in transit, infrastructure, and public spaces. Exempting developers from contributing through affordable housing fees means public subsidies would disproportionately support market-rate housing and commercial development. Rather than full exemptions, a potential adjustment could phase-in or reduce fees for initial projects, ensuring some affordable housing is still required. This approach could help jumpstart development while ensuring Wilburton remains an inclusive, mixed-income community rather than an exclusively market-rate district.</p> <p>Regularly adjusting in-lieu fees is a best practice, ensuring they remain effective, fair, and responsive to economic and housing trends. Staff recommend a periodic “look back” at both the catalyst program and overall fee structure to evaluate progress toward TOD goals. Without such reviews and adjustments, Bellevue risks falling behind in its housing targets, losing development activity to neighboring cities, or failing to generate the necessary revenue to meet housing needs.</p>	

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.
- 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. Staff Report
- B. Option A Strike-Draft (Mandatory Affordable Housing Approach)
- C. Option B Strike-Draft (Voluntary Affordable Housing Approach)