

Public Comment on

Evans Plaza Comprehensive Plan Amendment (CPA) Application

Permit # 25-121477 AC

Comments submitted to City staff or Planning Commission

June 3, 2026, to July 14, 2026

Note: Notice of Application published December 31, 2025

From: [Jessica Clawson](#)
To: [PlanningCommission](#)
Cc: [Deuling, Teun](#); [Nesse, Katherine](#); [Johnson, Thara](#)
Subject: Evans Plaza comp plan amendment comment letter
Date: Tuesday, June 9, 2026 9:52:28 AM
Attachments: [Planning Commission letter June 8 2026v1.pdf](#)

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

Hi Chair Khanloo and Commissioners:

Please see the attached comment letter from the applicant. Thank you!

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June 9, 2026

VIA ELECTRONIC MAIL

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

Re: Evans Plaza Comprehensive Plan Amendment

Dear Chair Khanloo and Members of the Planning Commission:

I am writing on behalf of the applicant, Steve Malsam, regarding the proposed Evans Plaza Comprehensive Plan Amendment. We appreciate the staff's work on this and the Commission's consideration of this application. We respectfully request that the site continue with the Lowrise 2 (LR2) designation, which is what we applied for.

Maintaining the LR2 designation is critical to achieving a site outcome that aligns with both the City's Comprehensive Plan goals and the City's stated desire for meaningful neighborhood-serving commercial space, in addition to housing density in a developed neighborhood. The implementing zones for the Lowrise 1 (LR1) designation, now recommended by staff, simply will not achieve the type of development that the City and other stakeholders desire. At the LR1 designation, it is much more likely that the site will remain in its current condition for the foreseeable future.

1. Feasibility of Mixed-Use Development with Active Ground Floor

The LR2 designation allows for heights up to approximately eight stories. This number of stories is essential to deliver a true mixed-use project with viable commercial uses at grade. Successful ground-floor retail requires sufficient residential density above to subsidize the higher construction costs associated with quality-built commercial space, and also allows some subsidization of commercial rents below.

By contrast, a Lowrise 1 (LR1) designation, with a maximum height of only 45 or 60 feet, would significantly constrain development capacity. After accounting for a properly scaled ground-floor commercial space (typically 15–18 feet clear height, which puts the deck of concrete at approximately 20 feet), an LR1 project would yield only two to four stories of residential above. This level of density is insufficient to support economically viable retail, risking underutilized or inactive ground-floor space—contrary to neighborhood expectations and City objectives.

The bottom line—if the neighborhood and the City are looking for good mixed use commercial space, you must allow for sufficient height above to allow the commercial to occur. Pinched commercial heights create bad retail spaces, and frankly, the site will remain as it is if designated at LR1.

2. Scale and Compatibility with Surrounding Uses

Concerns about scale and compatibility are understandable, but they are not applicable in this context. This site is not adjacent to established single-family neighborhoods or low-scale residential uses. Instead, it is:

- Directly adjacent to 520 (elevated in this location) and two arterial streets
- Buffered by a PSE-owned greenbelt
- Located at the bottom of a hill
- Surrounded by existing commercial uses, including a business park, Dunn Lumber, and a large church.

These characteristics substantially reduce the potential for typical scale and transition impacts. Staff compared Evans Plaza to neighborhood centers such as Northtowne, Bell-East, and Newport Hills, where lower-intensity designations are appropriate due to proximity to single-family homes and small-scale multifamily development. Evans Plaza is not similarly situated—it is surrounded by commercial uses, a freeway, arterials, and is a very commercial site. Please see Exhibit A, attached to this letter, to see the siting of the LR1 designated properties. LR2 makes much more sense for Evans Plaza, particularly when compared to other neighborhood centers that are designated LR1.

3. Development Standards and Site Constraints

The zoning constraints for LR1 implementing zones are also much more restrictive than LR2, creating an even less dense, and less likely to occur, development. The Evans Plaza site has a high water table, meaning site planning efficiency is critical and the developable area must be utilized as effectively as possible. In particular:

- LR1 zones impose more restrictive limits on impervious surface and hardscape coverage (limits of only 65% impervious surface coverage versus 95% for LR2).
- LR2 implementing zones allow a floor area ratio (FAR) of up to 3.0, which is more consistent with the site's location near the Bel-Red corridor—an area planned for significantly higher intensity development. In contrast, LR1 zones limit FAR to 2.0–2.5, which would further constrain the ability to deliver a meaningful mixed-use project.

LR2 is a more “urban” designation in terms of the implementing zones; this is a much more appropriate designation given the location and heavily commercial character of Evans Plaza and its surrounds.

4. Design Review and Quality Assurance

Regardless of designation, all relevant implementing zones are subject to design review requirements. As such, there will be appropriate regulatory oversight to ensure the project meets Bellevue's design standards and integrates well with its surroundings. Retaining the LR2 zone, still subject to design review, will lead to the type of mixed-use commercial project that is appropriate for the location and meets the City's broader land use goals.

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We respectfully urge the Planning Commission to recommend maintaining the LR2 designation for this site. Thank you for your time and consideration.

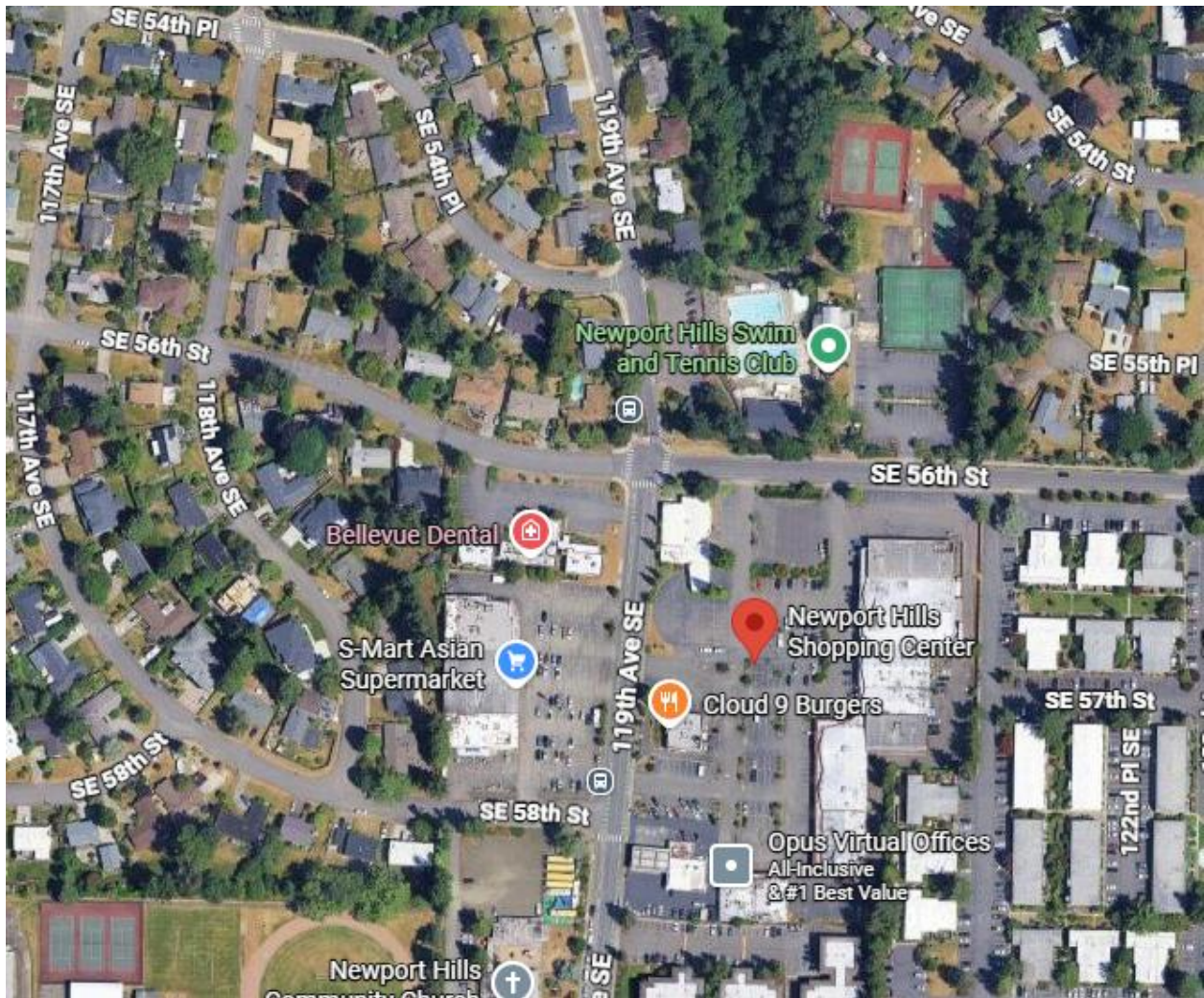
Sincerely,

Jessie Clawson

EXHIBIT A

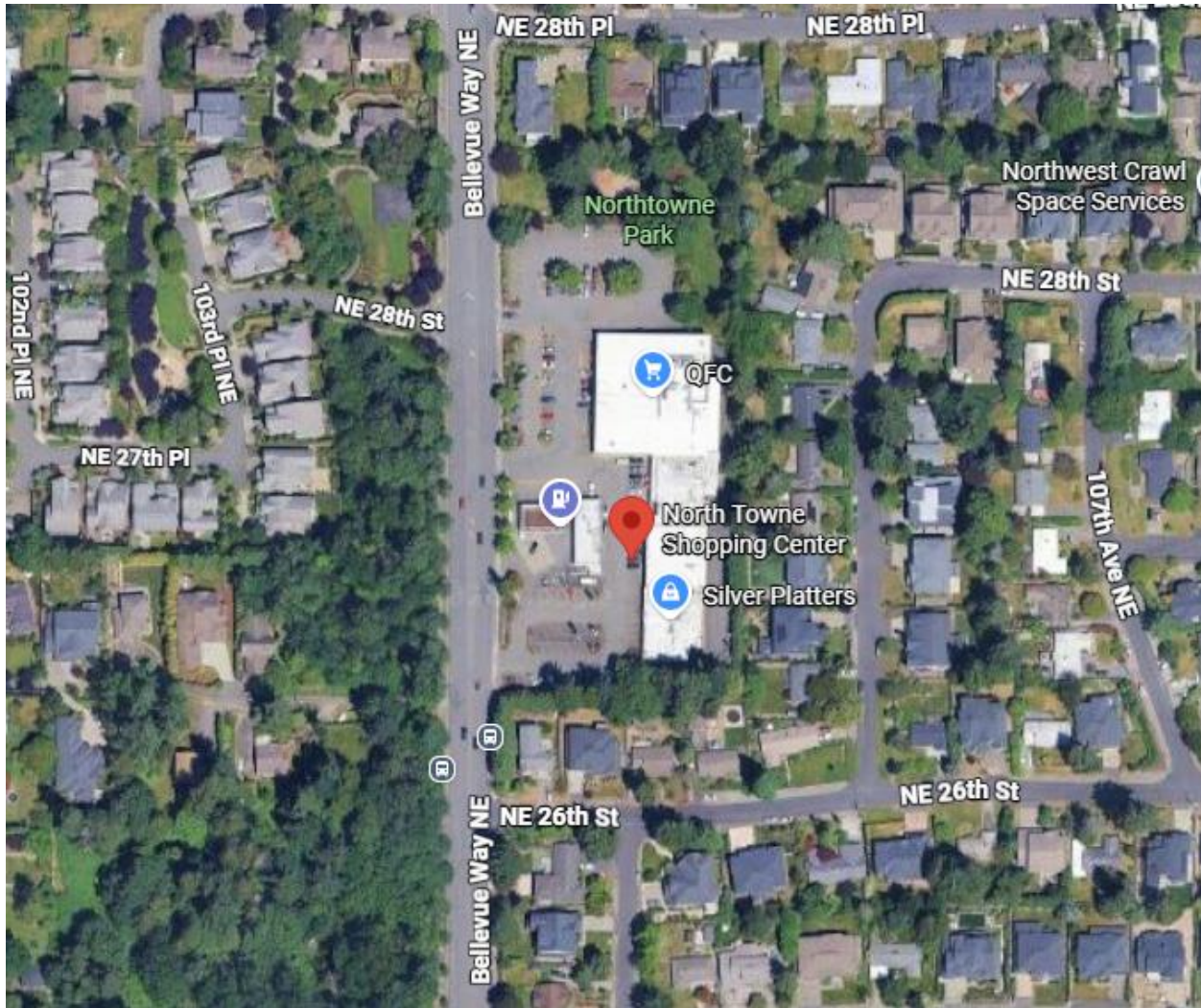
Newport Hills Shopping Center

5806 119th Ave SE



Northtowne Shopping Center

2620 Bellevue Way NE



Bel-East Shopping Center

1500 145th Pl SE



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Evans Plaza

2299 140th Ave NE



From: [Steve Malsam](#)
To: [PlanningCommission](#)
Subject: Evans Plaza Comp Plan Amendment
Date: Tuesday, June 9, 2026 7:43:25 PM

You don't often get email from steve@wakefieldproperties.net. [Learn why this is important](#)

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

To the Planning Commission:

On behalf of the landowner, Len Evans, I wanted to inform the Planning Commission that the staff recommendation of Low Rise 1 Mixed-Use is not an appropriate designation for this property. This land-use designation will not encourage the re-development of the Evans Plaza. This type of designation will likely leave the property as an old commercial center or will be sold to a townhouse developer. I do not believe this is what the City of Bellevue wants to see in this fast-changing corridor.

Jessica Clawson has written a more formal letter outlining our position on the Low-Rise 1 designation. I highly encourage the Planning Commission to adapt the requested Low-Rise 2 designation. This is much more consistent with the area and will allow for the economics to work. Low-rise 1 is not a feasible solution for a property that is located near light -rail, shopping, SR 520, Microsoft, etc...

Thank you for your consideration.

--Steve Malsam, Owner's Representative

Get [Outlook for iOS](#)

From: [pamela johnston](#)
To: [Deuling, Teun](#)
Subject: EVANS PLAZA HANDOUT
Date: Sunday, July 12, 2026 6:19:07 PM
Attachments: [EvanzPlazaPublicHearingPamphlet8x11forPlanningCommissionJULY2026.pdf](#)

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

See attached,,

-pamela johnston

THE CURRENT USE WORKS

Evans Plaza is fully occupied with Bridle Trails Neighborhood uses such as daycare services, pet care, many restaurant choices, dry cleaner, coffee drive up, ice cream parlor, grocery store, salons, furniture consignment, car rental, car repair and tire sales, motorcycle sales, and specialty auto sales and more. Most are small businesses relying on lower rent. This has not changed since the Comp Plan.

CONGESTION AND MOBILITY

The intersection at Evans Plaza is primarily as a commute conduit to/from SR-520. extrapolating from the FEIS Comp Plan study, adding housing at the Lowrise 2 level will cause the 140th/NE 24th intersection to fail.

Pedestrian traffic is not likely to change due to steep hills and distance to homes.

Evans Plaza is ideally located as a cycling hub next to the 520 bike trail exit: a missed opportunity for cycling-related businesses.



UNPLANNED NEIGHBORHOOD CENTER

The PineView Neighborhood Center vision is not in Bellevue's adopted Comprehensive Plan, and the Evans Plaza CPA does not meaningfully adhere to a neighborhood center vision. Housing near a freeway has not been mitigated. Residents had no part in creating this center, including "PineView" as a name; pines are not native to the area.

Allowing Lowrise 2 development at heights up to 85 feet & 95% lot coverage is inconsistent with the existing neighborhood character and does not provide a suitable transition from the higher-intensity areas. The CPA creates an

unfair exception for one property while other GC properties with same conditions miss out.

The Housing Opportunities in Mixed Use Areas (HOMA) growth policies have already expanded housing opportunities in PineView (in orange). Given the significant housing capacity created through HOMA and the Comp Plan, more upzoning for housing is premature.



A 20-YEAR PLAN

General Commercial properties outside the Urban Core remained unchanged in the Comprehensive Plan. No site-specific commercial properties were added to the FEIS study. Planning Commission concluded Lowrise 2 Mixed Use is not appropriate for Neighborhood Centers.

The Evans Plaza CPA conflicts with the Comprehensive Plan and neighborhood policies. The reasons cited in the first application, leases and economics, reflect normal business circumstances, not community need.

Given our 20-year plan has not changed and the high risk of loss or displacement of profitable businesses, high congestion, no transit service, and citywide affordable housing goals being met early, why would we separate the decision for this one property from all other general commercial properties now allowed to have housing? Why is 85 ft and 95% lot coverage needed? Why is it more important than small and utilized business that will be displacement?



The property is in Bridle Trails at the corner of 140th Ave NE and NE 24th St.
The owner's rep noted The Woods in Alderwood is a similar development
Application Requested
5 STORIES OVER 2 STORIES of parking,
MUR-8 meets that request.



WHY SHOULD I CARE ABOUT EVANS PLAZA?
CPA & FUTURE REZONE FOR HOUSING & MIXED USE
Owner request to increase density & height from 30 ft to 85 ft (8 stories)

PUBLIC HEARING AT THE WED JULY 22ND 6:30PM AT CITY HALL

PLANNING COMMISSION AND CITY COUNCIL OPTIONS

Evans :Plaza and 7-11, aka "Evans Plaza" CPA:
Stats: 6 parcels,
10 acres
108,547 building net sf.



Alternative 0



Alternative 1



Alternative 2



Alternative 3

Use	Continue to not allow housing in General Commercial zones citywide	General Commercial, City must update the Code to comply with SB 6026	Lowrise 1 Mixed Use, per staff recommendation	Lowrise 2 Mixed Use, per application
Strategy	No Housing allowed	Allow housing on all GC parcels citywide.	Allow housing on 6 parcels.	Allow housing on 6 parcels.
Zoning	GC	GC	Neighborhood Business (NB) Community Business(CB)	MU-8
Height	30 ft	TBD	NB: 45 ft – 4 stories NB: 60 ft CB 60 foot 4-6 stories	85 ft – 8 stories
Density	.5 FAR max .24 current 110,000 building sf.	TBD	4-5 times as dense 2 to 2.5 FAR ~100 - 150 units per acre	6-7 times as dense 3 FAR ~ 200 units per acre
Green space	15%	TBD	5%	5%
Business Retention	N/A	TBD	No Plan	No Plan
City Council Legislative Action	No changes - This option is not possible due to SB 6026	Ordinance satisfying SB 6026 ; all GC parcels citywide.	Ordinance for Future Land Use Map on 6 parcels, then rezone	Ordinance for Future Land Use Map for 6 parcels , then rezone
Time Frame	n/a	7/2027 citywide, no Re-zone necessary	Q4 2026 for 6 parcels , then Rezone process	Q4 2026 for 6 parcels , then Rezone process

OWNERS CHOICES



Option 0



Option 1



Option 2



Option 3



Option 4



Option 5

Withdraw application. After Threshold review, this is the same as #5.

Do Nothing: Owners have no obligation to redevelop the property

Sell: The approval goes with the land

Redevelop with State mandate changes for General Commercial

Redeveloped in phases over time.

Wait 3 years and try again,

WHAT CAN YOU DO?

PUBLIC HEARING WED JULY 22, 6:30 PM



Meh!



Ask!



Tell!!!



Chat!



Call!

Do Nothing

Ask City Staff:
Teun Deuling,
425-229-6534
tdeuling@bellevuewa.gov

PlanningCommission@bellevuewa.gov
cc Council@bellevuewa.gov
cc Board@BridleTrailsCommunity.org
Attend the Public Hearing

Ask BTCC:
Email or call a board member
Board@BridleTrailsCommunity.org
call Pam, .425.200.2224

Call a Council member
425-452-7810

THE COMPREHENSIVE PLAN

The [Comprehensive Plan](#) sets Bellevue's growth direction for the next 20 years. It must comply with State and County Growth Management Act (GMA) requirements.

COMPREHENSIVE PLAN AMENDMENT

Owners can apply for an amendment to the Comprehensive Plan to the Future Land Use Map, which changes the use of the property, which changes the associated zoning.

CPAs are legislative: a Council vote.

WHAT ARE THE CRITERIA FOR A CPA

CONSISTANT WITH THE COMP PLAN

An amendment must not conflict with the Comp Plan and other goals and policies.

CHANGED NEEDS

The proposed amendment must address the interests and changed needs of the entire City.

SIGNIFICANTLY CHANGED CONDITIONS

The proposed CPA must address significantly changed conditions since the last text or map was amended.

WORKS IN THAT PLACE

The property must be suitable for development in general conformance with adjacent land use, surrounding development pattern, and zoning standards.

PUBLIC BENEFIT

The proposed amendment must demonstrate a public benefit & enhance public health, safety and welfare of the city.

See Bellevue City Code: Part 20.301 Amendment and Review of the Comprehensive Plan

Scan to learn about State Law / SB 6026



Scan to be at the top of the list for speaking at the Evans Plaza public hearing



See the Agenda and staff documents



PLANNING COMMISSION RECOMMENDS; COUNCIL DECIDES

ALTERNATIVE ZERO:



No housing in General Commercial areas. This alternative is not an option because the state has mandated housing for GC parcels.

ALTERNATIVE ONE:



Treat Evans Plaza/7-11 the same as other General Commercial (GC) parcels.

SB 6026 mandates General Commercial zoning allows housing by end of 2027. GC parcels could be handled in a **broader SB 6026 Implementation Plan** rather than ad-hoc CPAs. Include a visioning process when implementing SB 6026.

ALTERNATIVE TWO:



Allow Evans Plaza/ 7-11 to redevelop at the Staff recommended level of Lowrise 1 Mixed Use.

For Neighborhood Business, Buildings can be up to 45-foot-tall. The incentive for affordable housing is 15 feet more in building height permitted if at least 15% of the units are affordable.

For Community Business, height can be 60 feet. The height and density associated with zoning were not known until Mar. 2026.

ALTERNATIVE THREE:



Allow Evans Plaza / 7-11 to redevelop at Application request of Lowrise 2 Mixed Use. Buildings can be up to 85-foot-tall with an added 15 feet of building height permitted if at least 15% of the units are long-term affordable. The height and density for this zone were not known until Mar. 2026. (HOMA).

CPAs are legislative actions: Ordinances



WRITE TO PLANNINGCOMMISSION@BELLEVUEWA.GOV
AND CC BOARD@BRIDLETRAILSCOMMUNITY.ORG

THIS DOCUMENT IS AN UNOFFICIAL, NEIGHBOR TO NEIGHBOR GUIDE.
CONDUCT WITH AN ATTORNEY FOR LEGAL ADVISE

THE ZONE VS THE FUTURE LAND USE MAP

ZONING and the **FUTURE LAND USE DESIGNATION** have close meaning and in casual communications are often used interchangeably. Legally they are very different.

The Future Land Use map designations are general grouping of density, scale, and use. Changing the map just take 4 votes of the City Council via the Comp Plan Amendment process. The process helps prevent spot zoning and unfair advantage. Council members act as representatives of the public and can discuss the issues just like any other legislative action.

Zoning is a quasi-judicial process. There is a lot of concern for expert communication and spot zoning. Comprehensive Plan consistency and significant changes are the tests for illegal "spot zoning".

Bellevue Land Use code has **THE ZONING LAWS**, which determine how land can be used in detail. Officially, Bellevue uses the term **LAND USE DISTRICT** and **CHANGING THE LAND USE DISTRICT** rather than zoning and rezoning.

UPZONE means changing the land use district to increase density. "**ZONING**" often produces strong opinions. Using the different terms can be seen as a smokescreen. However, it is also used to avoid assumptions about zoning and zoning rules.

A **CONCURRENT REZONE** is the change in "zoning," aka **THE LAND USE DISTRICT** for a property that receives an approval for its Comprehensive Plan Amendment (CPA). A concurrent rezone request may only be submitted together with a proposal for a CPA.

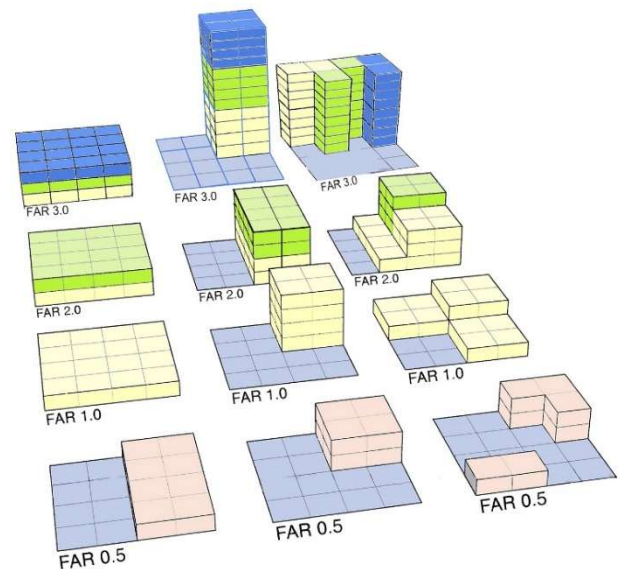
FLOOR AREA RATIO

FLOOR AREA RATIO is a measure of bulk. It does not tell you the maximum height of a building. It does not tell you how much of the ground is covered.

However, when a maximum height, number of stories, and footprint is given, the **FLOOR AREA RATIO** can determine square footage of floor space of the building.

Examples

Each brick is one unit wide, one unit long, and one story high.



FLOOR AREA RATIOS OF 0.5, 1, 2, AND 3

	COL 1			COL 2			COL 3		
3 FAR	48 BRICKS	3 STORIES	100% LOT COVERAGE	48 BRICKS	24 STORIES	25% LOT COVERAGE	48 BRICKS	8 STORIES	50% LOT COVERAGE
2 FAR	32 BRICKS	2 STORIES	100% LOT COVERAGE	32 BRICKS	4 STORIES	50% LOT COVERAGE	32 BRICKS	4 STORIES	75% LOT COVERAGE
1 FAR	16 BRICKS	1 STORY	100% LOT COVERAGE	16 BRICKS	4 STORIES	25% LOT COVERAGE	16 BRICKS	2 STORIES	75% LOT COVERAGE
.5 FAR	8 BRICKS	1 STORY	50% LOT COVERAGE	8 BRICKS	2 STORIES	25% LOT COVERAGE	8 BRICKS	2 STORIES	31% LOT COVERAGE