

From: [John Wu](#)
To: [PlanningCommission](#)
Subject: Comments on the Wilburton Comprehensive Plan
Date: Wednesday, March 22, 2023 7:27:35 PM

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

My name is John Wu. I live in the Wilburton Neighborhood Area. I attended today's Planning Commission meeting. I have some comments on the Wilburton Comprehensive Plan. I know there are developers who want to make quick and big money and encourage and pressure the Commission to increase density significantly, but they don't live here. We don't want only people on the outside deciding our fate, please take into account the opinions of local Wilburton residents.

On behalf of our Wilburton residents, please consider the following when addressing intermediate housing needs in our residential zoning districts.

(1) Neighborhood sub-areas vary in character, density, landscape, and environment. A one-size-fits-all approach does not take into account the quality of life of the residents in the affected neighborhoods.

(2) Limit the type of density to ADUs and DADUs, as Wilburton will be impacted by significant growth in the BelRed corridor and light rail.

(3) Mitigate the impact of surrounding growth and traffic. Limit the number of housing units to a maximum of 1-2 single units.

(4) Understand the significant impact of unintended consequences on the community and work with community members as partners.

(5) ADUs and DADUs must be sensitively designed to fit with existing surrounding development so as not to destabilize a neighborhood. Add gentle density with any Detached Accessory Dwelling Units (DADU).

It is important to consider the residents of Wilburton and other residents affected by growth, those who have invested in their homes, neighborhoods, communities, and the city for many years. These changes will affect our quality of life and our environment. Those who do not live in our zoning district do not know our history and the unique qualities of our community that we so enjoy.

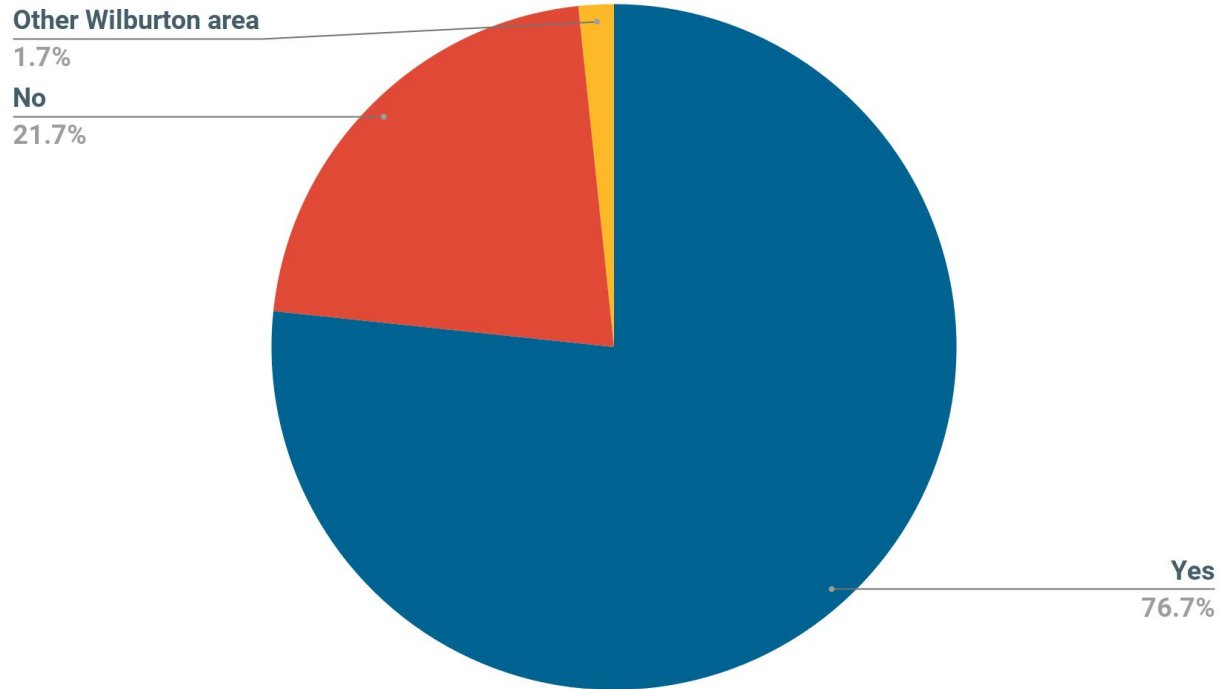
Thank you!

John Wu

Wilburton Housing Poll

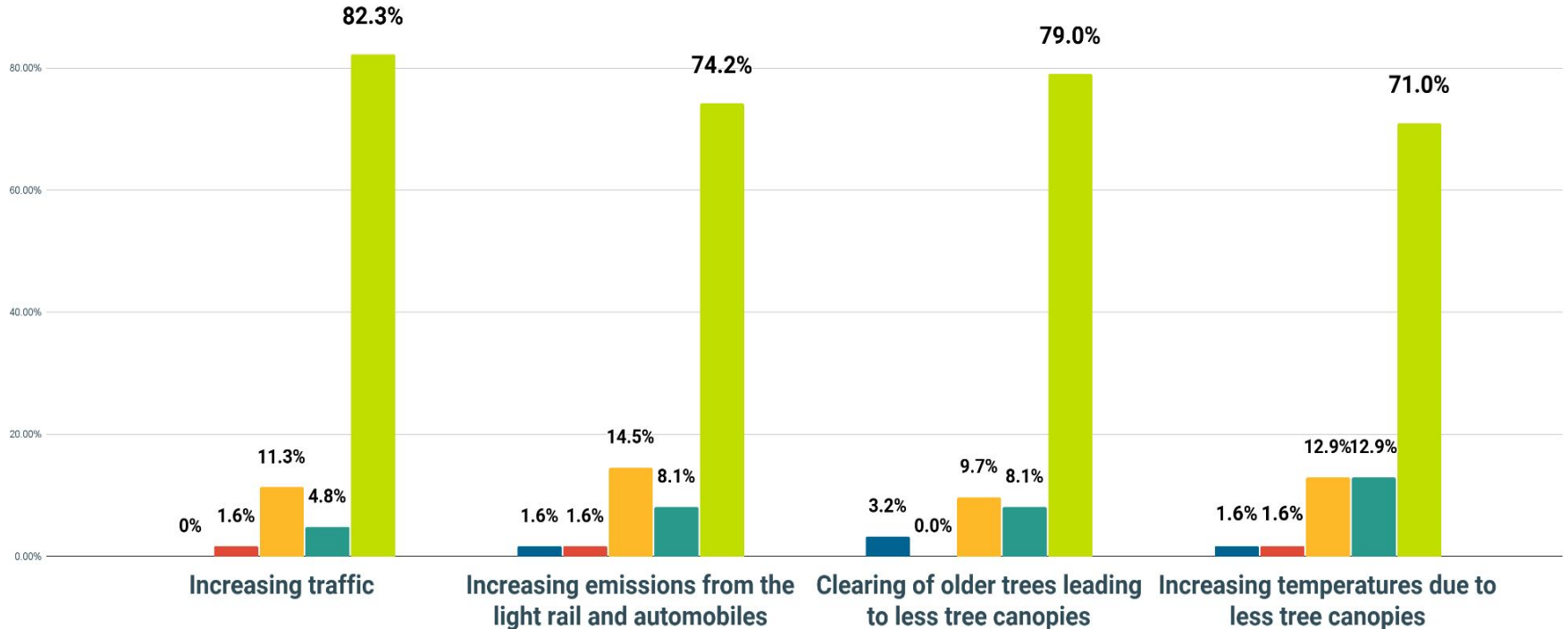
Survey on Increasing Housing Density
and its Impacts

Question: Do you currently reside in the Wilburton Subarea in a single-family residential home between BelRed and NE 8th Street?



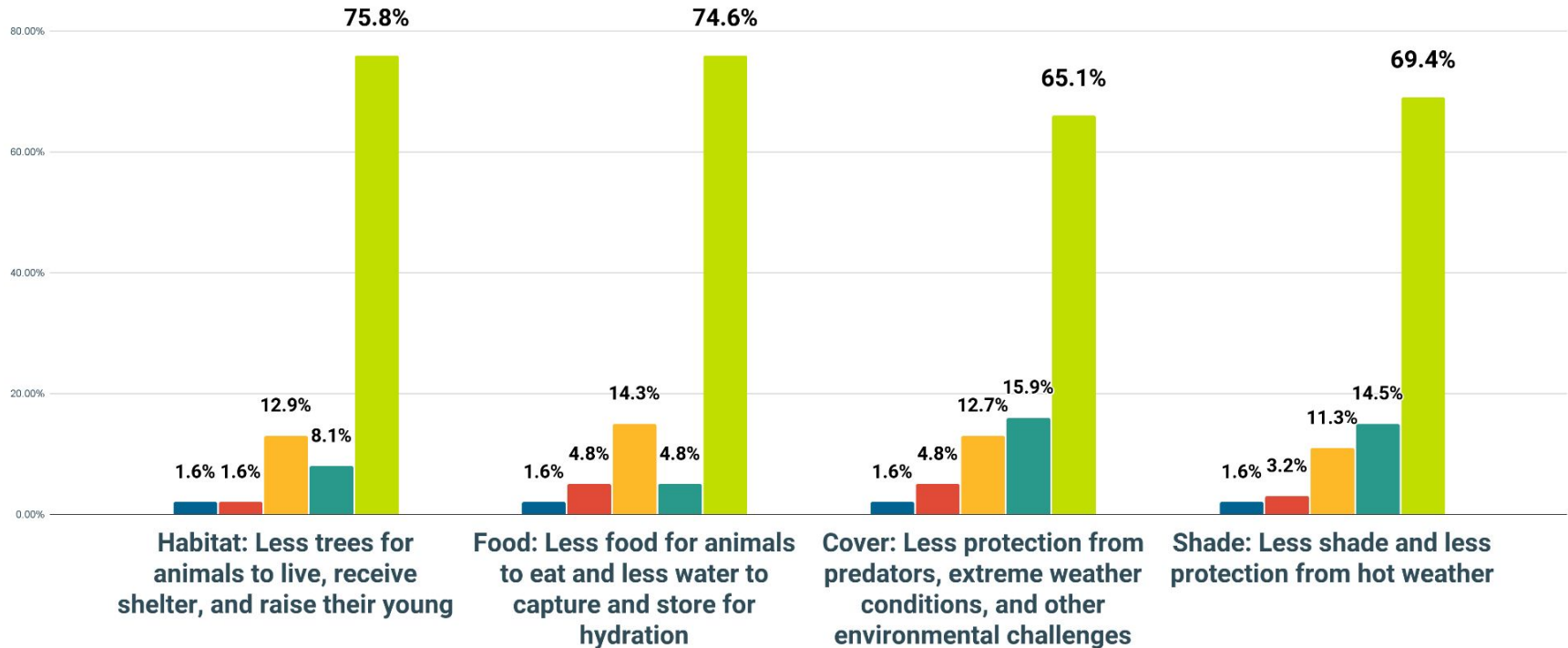
Please rate on a scale of one to five, where 5 means very concerned and 1 means not at all concerned, how concerned are you about **increasing housing density and the impact it will have on the following:**

■ 1 (Not at all concerned) ■ 2 ■ 3 ■ 4 ■ 5 (Very concerned)



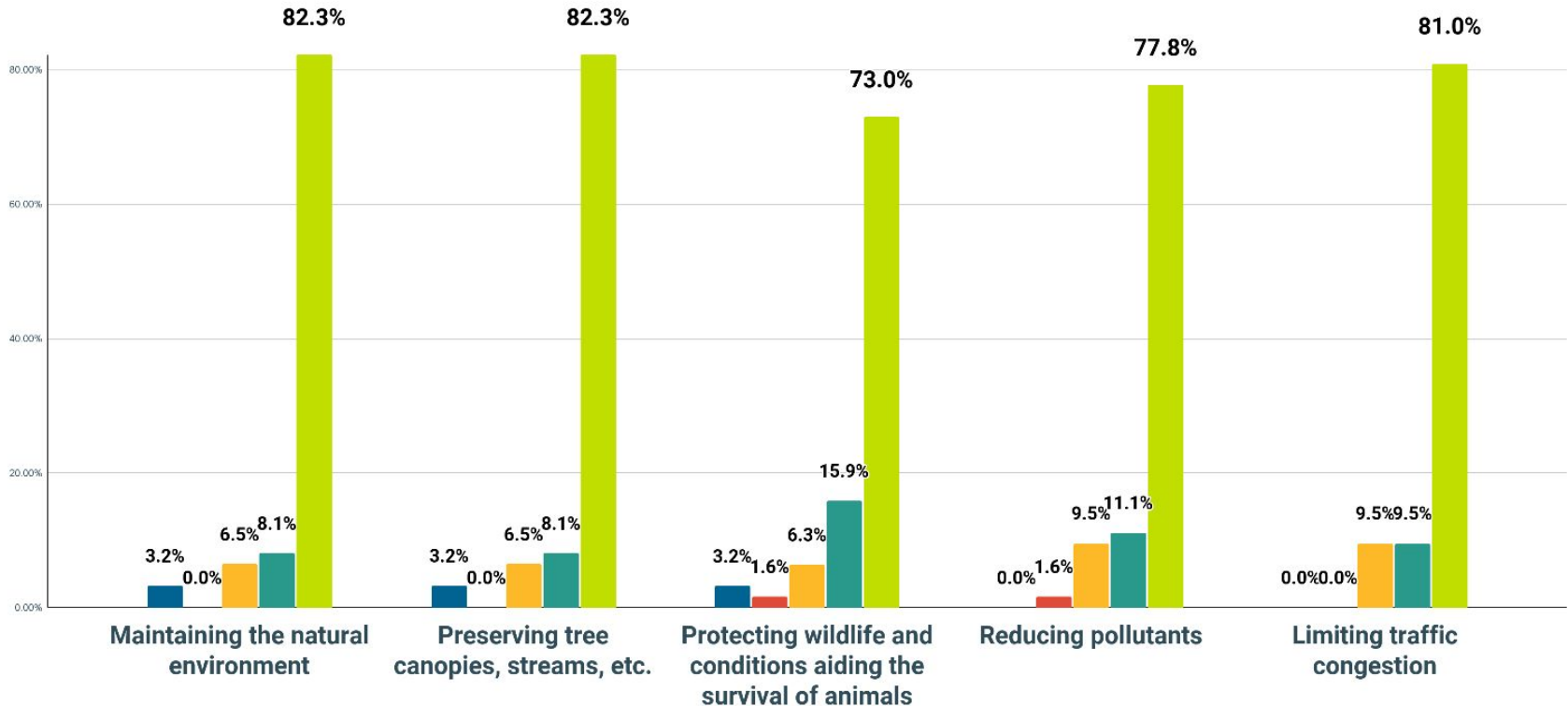
Please rate on a scale of one to five, where 5 means very concerned and 1 means not at all concerned, how concerned are you about **increasing housing density and the impact it will have on the following *wildlife survival challenges***:

■ 1 (Not at all concerned) ■ 2 ■ 3 ■ 4 ■ 5 (Very concerned)

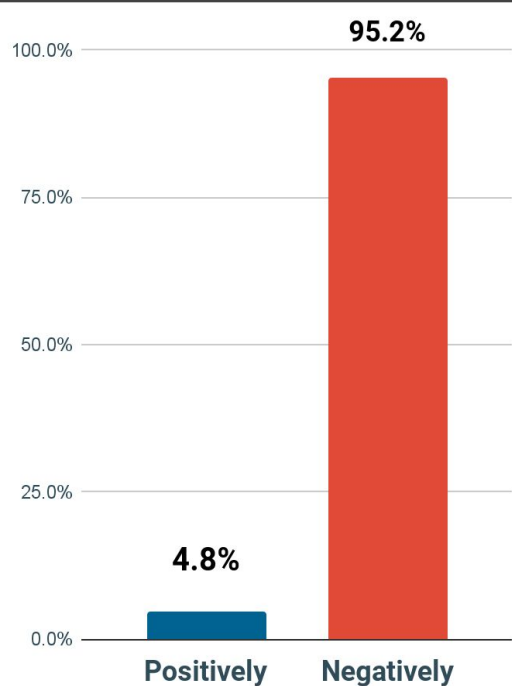


Please rate on a scale of one to five, where 5 means very concerned and 1 means not at all concerned, how concerned are you about **increasing housing density and the impact it will have on the following:**

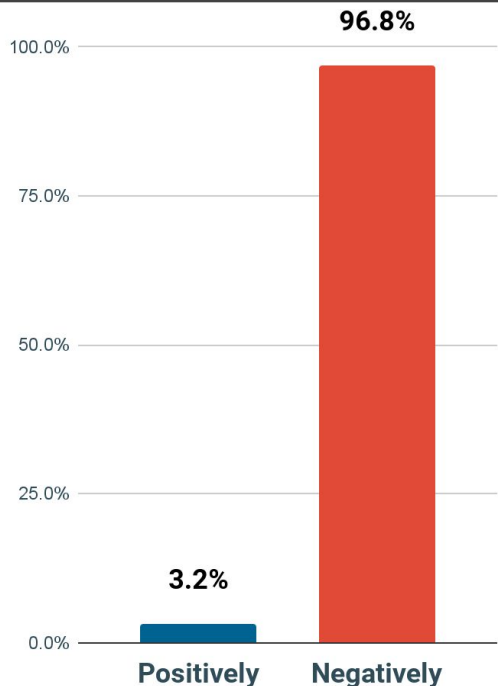
■ 1 (Not at all important) ■ 2 ■ 3 ■ 4 ■ 5 (Very important)



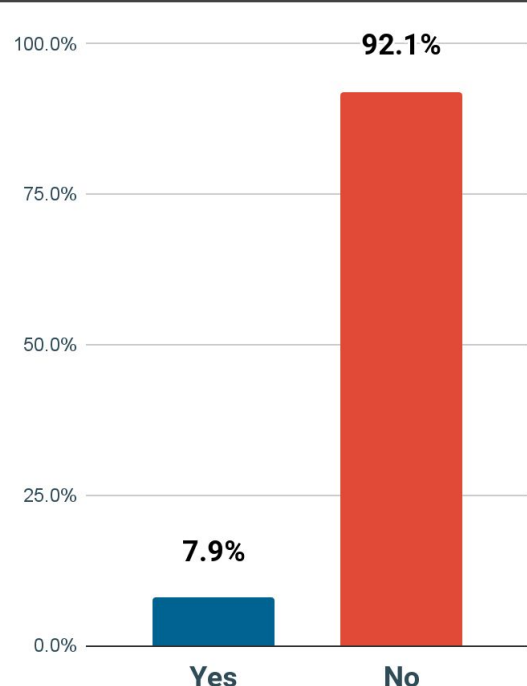
Question: Do you think increasing housing density and middle housing options would positively or negatively impact the *animal habitat, streams, and trees in our neighborhood?*



Question: Do you think increasing housing density and middle housing options would positively or negatively impact the *quality of life that you enjoy in your neighborhood?*

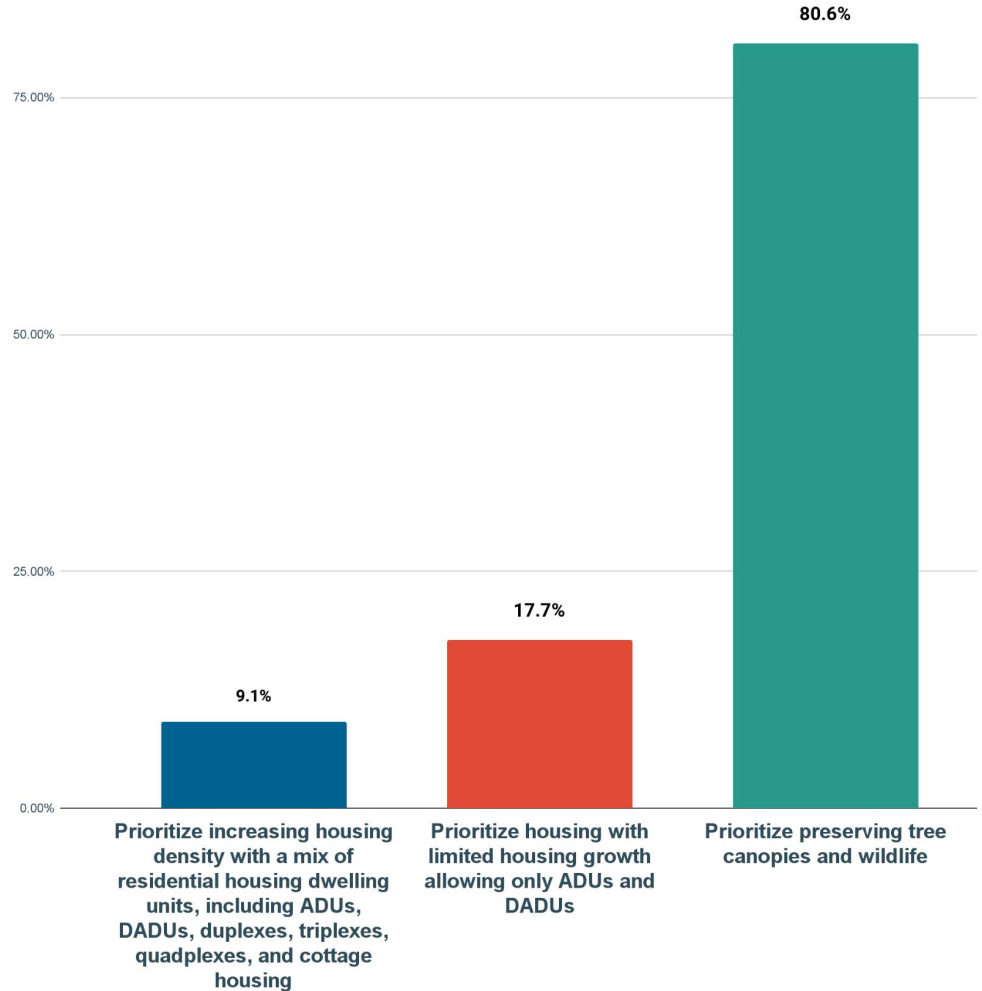


Question: Do you think the benefits of increasing housing density and middle housing options *outweigh the potential impacts on the environment?*

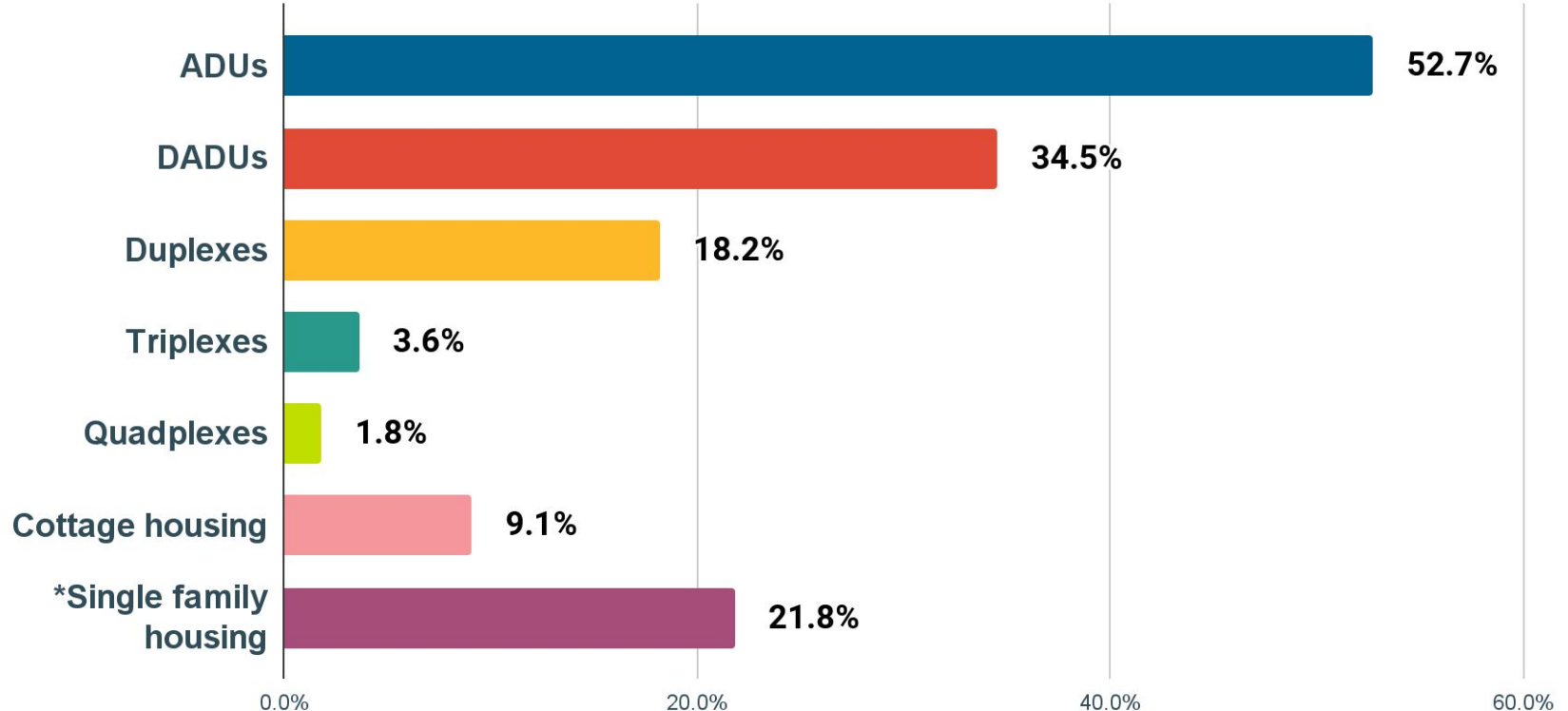


Question:

If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**



Question: Which of the following middle housing options do you think would be most appropriate for the Wilburton Subarea? Please check all that apply.

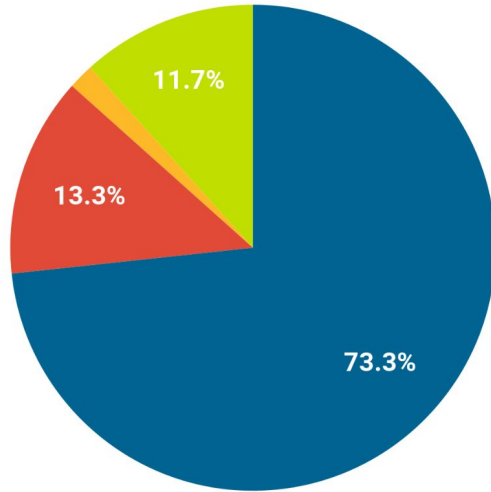


*Write-in answer

Question: What should the maximum number of units be for ADUs and DADUs?

- A maximum of 1 housing unit
- A maximum of 2 housing units
- A maximum of 3-4 housing units
- *No ADUS or DADUS

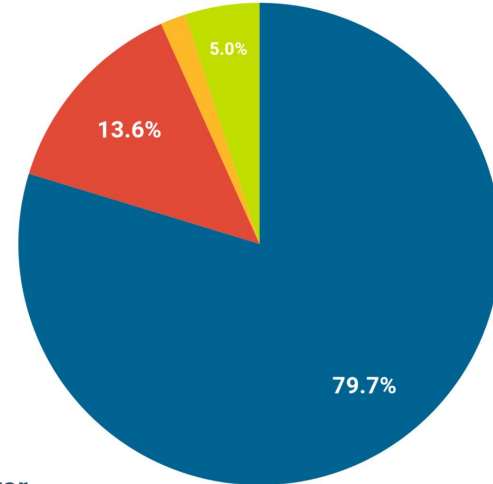
Note: "A maximum of 6 housing units" received 0 votes.



*Write-in answer

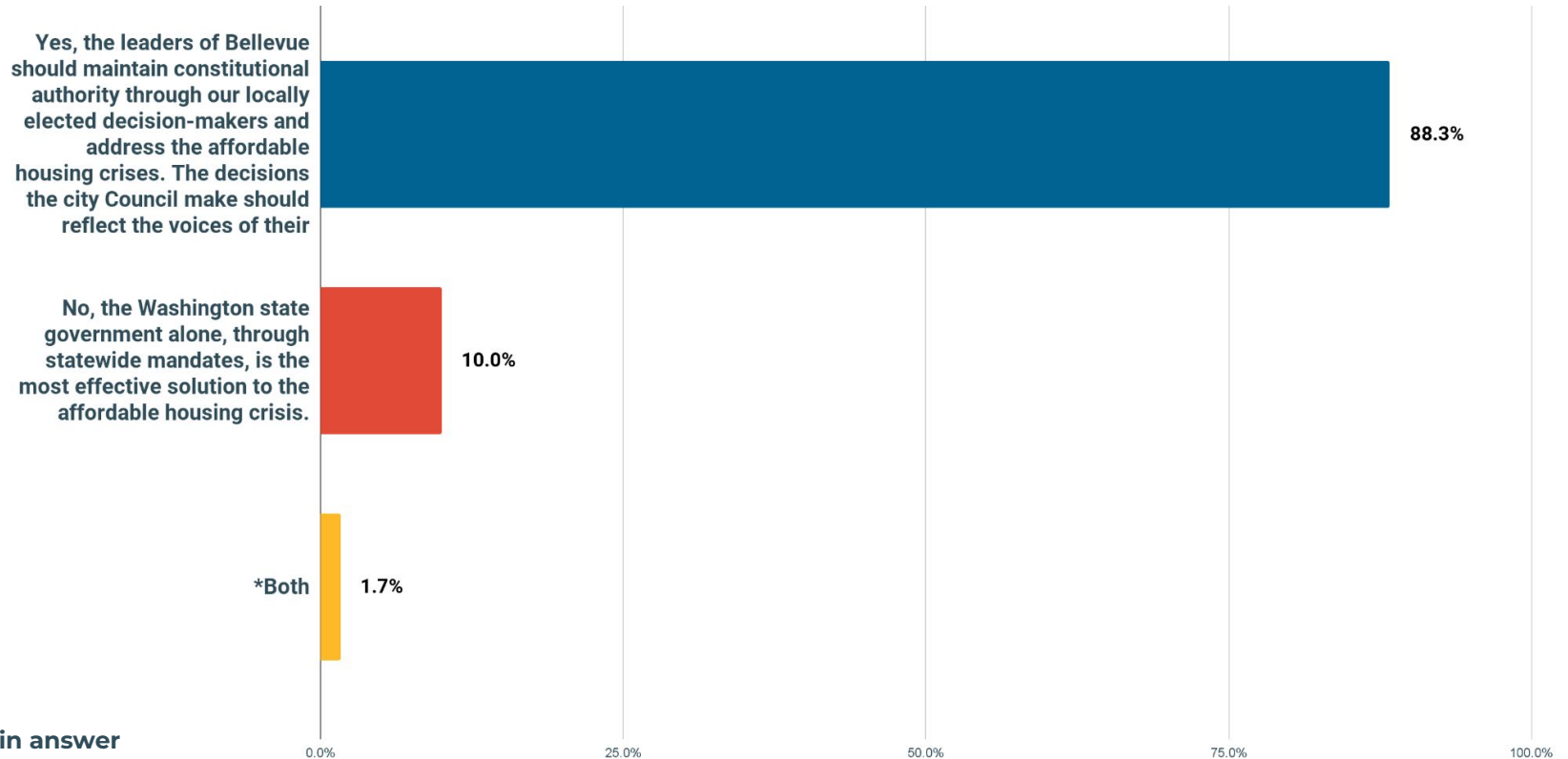
Question: Should the owner of the ADU or DADU occupy the main home?

- Yes
- No
- *Optional
- *No ADUs or DADUs

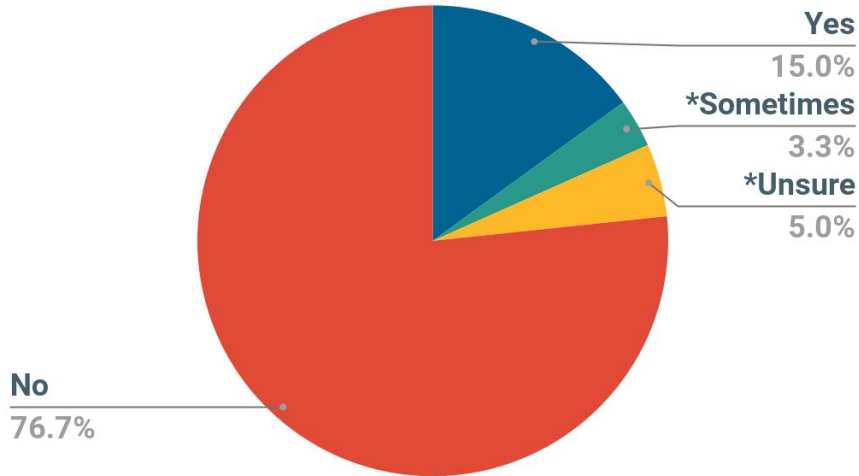


*Write-in answer

Question: Do you believe the city of Bellevue should maintain constitutional authority through our locally elected decision-makers, our City Council?

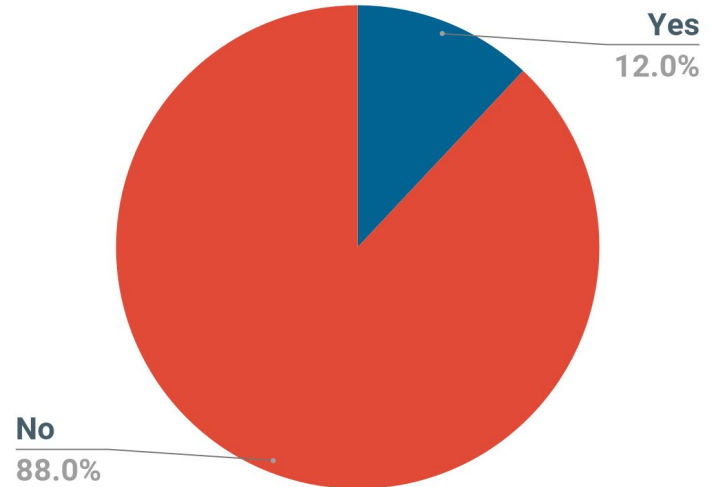


Question: Do you feel our elected City Council Members are reflecting the voices of the community to address affordable housing needs?



*Write-in answer

Question: Do you believe increasing new taxes and bigger statewide government mandates alone will improve the community and resolve the affordable housing crises?



Additional comments from participants:

- “There will be enormous future development surrounding Wilburton on two sides, the BelRed development and the Wilburton Commercial development, which will bring at least 5,000 housing units in the BelRed alone. This is more than the total number of housing units in the Wilburton subarea.

The GUIDING PRINCIPLES Bellevue City Council included ensuring the sensitivity to potential adverse impacts of change on nearby residential neighborhoods and providing for a graceful transition between new development and established neighborhoods.

Moreover, the economic outlook is changing. Employers are downsizing, schools have decreased enrollment, and there is increasing remote employment.

Lastly, there is no data supporting that increasing the density of single-family lots will bring affordable housing.

Residents have worked so hard to create a residential area they enjoy”

- “Listen to the voice of community”

- “Very concern about Bellevue leaders only focus on one thing of affordable housing but ignore more issues it will bring along. Like natural habitat, tragic, safety, school teacher and student ratio”

- “This really negativity impact us, I strongly disagree with this. Our voice need and should be heard”

Additional comments from participants:

- “The city will be over built and congested. What we have enjoyed as residence of this area will be lost and disappear forever. They have already cut down so many trees to build the light rail. No more. There are plenty of land outside of Bellevue that can be used to build affordable housing. Why do we need to subject our children and our family to all of this unnecessary negative changes. It does not make the area more desirable. We don't have the infrastructure to support the additional traffic and people.

The city council is making Bellevue one ugly city with skyscrapers and concrete jungle. The residence will be subsidizing this and we didn't ask for it. Please reconsider the expansion and rezoning. Thank you for your consideration”

- “Please keep what it is alike today -- there are a lot of traffic already in this area with more house and apartments developed on bel-red in the recent years. Every year, new buildings are coming out, more trees are removed and more animals [sic] loose their home.”

- “This is ludacris that it's even suggested to bring housing plans in next to real estate worth a million- the cost of wealth inequality and externalities would be footed by us residents.”

- “We need to protect the community and the [sic] natur, we need to keep the safety of the community as top priority”

- “Wilburton is a great place to live. Please keep it that way. No [sic] rezonong”

- “Concerns and questions about potential safety impact, crime rate increases esp. for families with young children”

Additional comments from participants:

- “While there always has been a need to be a team player with King County, the Bellevue City Council used to prioritize Bellevue residents until the last few years. Bellevue seems to be funding the lion's share of KC projects on the eastside. Bellevue is set to house the most challenging group of KC (Seattle) homeless population, single men, most of whom are NOT Bellevue or even KC residents. Eighty percent of these men are addicted to hard drugs and/or are unmedicated mentally ill and NONE are required to maintain treatment. Light rail will not be fully functional for a few years. Bellevue has one of the highest sales, property and other taxes which fund KC. Yet, we are always pressed to do MORE when we have already committed to many projects which will cause predictable increases in crime and traffic before we know the full consequences of such projects. I believe that we should wait higher density projects in residential areas until the aforementioned consequences become known and addressed. Downtown Wilburton should have increased density, not the residential neighborhoods. Whatever is decided in Wilburton will become a template for all of Bellevue residents. Councilmembers are elected to advocate for and represent our well being and quality of life, which should be their main concern if they truly represent us as they promised when campaigning.”
- “Crime rate and homeless camps”
- “Bad people. Roaming folks need to be kept from kids in the neighborhood. Seriously.”
- “Again, there are many areas outside of the Wilburton area that currently supports a great number of wildlife species. Cottage housing and multiple housing units should be built where it is reasonable to assume the wildlife habitat will not be erased.”
- “Bel Red should be mixed use”

SURVEY DEADLINE: MONDAY, JANUARY 9TH

QR
CODE

Wilburton Middle Housing Poll

To access the survey, please scan the QR code in the top right corner or type the following link in your browser:

(Browser Link)

We are a group of residents living between BelRed Road and NE 8th Street, a residential area of the Wilburton Subarea, conducting a survey to gauge residents' opinions on the issue of increasing housing density for affordability and protecting the neighborhood character, the environment and wildlife, and quality of life for our residents.

Affordable housing is an important issue in Washington state, King County, and the city of Bellevue. There are many factors contributing to the shortage of affordable housing including:

- household incomes that cannot keep up with increasing costs,
- increasing land and construction costs,
- limited availability of funding for affordable housing developments,
- the limited amount of residential land available for increasing density,
- rising interest rates that make it more expensive to finance construction costs,
- increasing demand for housing due to population growth.

To address this issue, the state of Washington, King County, and the city of Bellevue, are reviewing a variety of strategies to increase the availability of housing by building smaller houses and requiring zone changes in single residential areas for increasing housing density. Zone changes are changes in the regulations that govern land uses and can be used in residential areas allowing for smaller houses and potentially greater housing density. These alternative types of housing in areas within a half a mile radius from a major transit stop, such as the light rail or metro bus, may support the potential for greater density and housing affordability.

While growth and development can bring resources and opportunities to communities, with these benefits come challenges.

Increasing density challenges:

- increasing traffic
- increasing emissions from the light rail and automobiles
- clearing of older trees leading to less tree canopies due to additional housing developments
- increasing temperatures during the warmer seasons

Wildlife survival challenges:

- Habitat: Trees provide a place for animals to live, receive shelter, and raise their young
- Food: Trees produce food for animals to eat and capture and store water for hydration
- Cover: Trees provide a place to hide from predators, extreme weather conditions, and other environmental changes
- Shade: Trees offer shade and a place to stay cool during hot weather

The Wilburton Subarea nearest to transit may allow for a variety of different types of housing, such as Accessory Dwelling Units (ADUs), Detached Accessory Dwelling Units (DADUs) with a maximum of up to six units, and/or smaller homes, such as cottage housing, duplexes, triplexes, and quadplexes.

We are interested in hearing your thoughts on this issue and whether you support or oppose increasing housing density in your area in light of the BelRed development with 5,000 new housing units.*

Thank you for taking the time to participate in this short survey. Your feedback is important and may help to shape the future of our community.

***Background Information:**

The 900-acre BelRed development

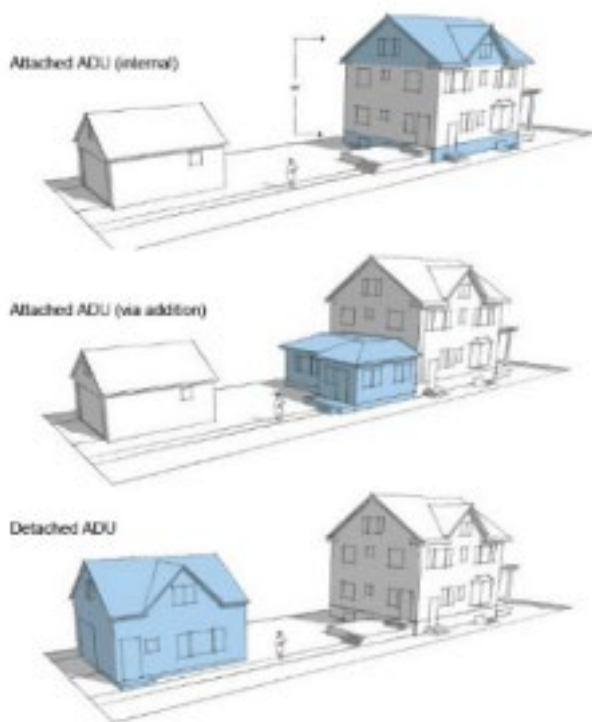
- by 2030, the BelRed 900-acre development is expected to generate 10,000 new jobs and 5,000 housing units
- current housing units being reviewed for construction - 2,514
- current housing, office and business parking – 6,433
- goal: to encourage Bel-Red redevelopment to result in a diversity of housing types and prices, including a significant share of “workforce housing.”

For this survey, “Wilburton Subarea” is defined as the “Wilburton single-family residential area between BelRed and NE 8th Street.” (The commercial residential housing areas alongside BelRed is part of the BelRed development.)

Middle Housing: ADUs and DADUs

Accessory dwelling units (ADUs) are small, separate living units that are built on the same property as a single-family home and are attached to the main dwelling.

Detached accessory dwelling units (DADU's) are like ADUs but are separate from the single-family home. These units usually range from 500 to 1,000 square feet and are often used as housing for multigenerational families or as rentals for temporary housing.



Middle Housing: Duplexes, Triplexes, Quadplexes, and Cottage Housing

Duplexes, triplexes, and quadplexes are separate single households living independently of each other and within the same building.

Cottage housing are groups of smaller detached housing units, typically 800-1,200 square feet, oriented around a common open space.

[Type here]

Duplex:



Fourplex or Quadplex:



Cottage Housing:





June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update DEIS Comments
c/o Thara Johnson, Comprehensive Planning Manager
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

Via electronic mail: CompPlan2044EIS@bellevuewa.gov

Re: Amazon comments on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Johnson,

On behalf of Amazon, thank you for the opportunity to comment on the City of Bellevue's 2023 Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. We applaud city staff on their work to deliver a thorough draft analysis. We also appreciate the City of Bellevue's public engagement, including direct engagement with the business community as stakeholders.

As a major employer that is growing in Bellevue, we support the city's effort to chart a bold vision for how Bellevue should grow, locate housing and jobs, and make investments in transportation, utilities, and parks in the next twenty years. Amazon is committed to partnering with the City of Bellevue and the community on this important planning effort.

Amazon first opened an office in Bellevue in 2017 and we had about 450 employees in the city at the time. As customer demand increased through the years, we continued to hire and grow in the Puget Sound region. In 2019, we announced plans to invest much more on the Eastside—bringing 25,000 jobs, and making Bellevue and the Eastside the location of our future growth in the Puget Sound region.

Building off of our EIS Scoping letter submitted on October 31, 2022 where we emphasized the importance of striking balance between job growth and housing stock, we highlighted three areas for consideration:

- Study 80,000 housing units and 30,000 job capacity above the No Action Alternative
- Prioritize density around frequent and reliable transit
- Study multimodal solutions as mitigation of growth and dense, mixed-use development

We thank the Bellevue 2044 team for taking our comments into consideration in the draft analysis. Specifically, we see our inputs reflected in Alternative 3 where housing capacity increased from initially 65,000-70,000 housing units to 95,000 housing units and jobs capacity increase from 145,000 jobs to

2121 7th Avenue
Seattle, WA 98121

200,000 jobs. Additionally, we see our comment to prioritize density around frequent and reliable transit and increase height and density in BelRed and Wilburton reflected in Alternative 3 where additional height and density was studied. Last, we support the city's use of a multimodal transportation analysis, based on the Mobility Implementation Plan (MIP) adopted by City Council in 2022, to evaluate various growth alternatives within the DEIS.

Consistent with those priority themes shared in our initial comment letter, Amazon offers the following comments for consideration for the final Environment Impact Statement (FEIS) and selection of the preferred alternative:

- **Alternative 3 Best Reflects Bellevue's Needs:** Upon review of the three Action Alternatives, we believe Alternative 3 allows for the diversity and density of housing and job growth that best reflect Bellevue's needs. Alternative 3 also focuses growth in BelRed, Wilburton, and Downtown, where there are existing and planned transit investments to encourage transit-oriented development. We also support the taller heights in Alternative 3 to allow for more flexibility for housing and better feasibility for high-rise building typologies.
- **Connection between Alternatives and Affordable Housing Programs:** We suggest the city clarify in the FEIS why each Action Alternative is paired with different affordable housing programs such as incentive zoning versus mandatory inclusionary affordable housing and whether they can be decoupled. Additionally, it would be instructive to study how various affordable housing programs and calibrations of those programs might yield different outputs in each of the Action Alternatives. We suggest the city show, in the FEIS, analysis that compares estimated market-rate and affordable housing unit output, broken down by area median income (AMI) affordability levels, for each of the Action Alternatives. The analysis should compare the different affordable housing policy tools that are being considered, including but not limited to incentive zoning, mandatory inclusionary (with and without fee-in-lieu and deed-in-lieu options), and MFTE. The analysis should account for how these different policy tools, such as incentive and mandatory inclusionary zoning, affects overall residential development decisions. The analysis should also take into consideration the role of other non-land use related affordable housing funding and financing tools such as the Washington State Housing Trust Fund and the federal Low Income Housing Tax Credit. This level of analysis would help the city select affordable housing policy approaches informed by data and modeling.
- **Simplify Land Use Designations:** The current maps show 53 land-use designations which is quite complicated. We suggest finding ways to consolidate them into more flexible 'mixed use' zones.
- **Reflect Phased Buildout Over 25 Years:** For baseline comparison, it would be informative to show in the FEIS previous pace of growth in Bellevue. For example, show the percentage of developable land that was redeveloped within the last 25 years. The city can apply that baseline to the alternatives to provide a data-informed, more realistic view on how each of the alternatives could potentially meet, not meet, or exceed the King County Growth Targets of 35,000 housing and 70,000 jobs over a 25-year span in Bellevue. In part, Amazon supports Alternative 3 because we understand that capacity does not necessarily result in development. Alternative 3 provides ample capacity, and therefore flexibility, to help the city accommodate the expected growth and achieve a more favorable housing to jobs ratio. Based on Figure 2-10 on page 2-32, in order to meet or exceed the 35,000-housing target, 59% of all developable residential capacity would need to be built in Alternative 1, 45% in Alternative 2, and most realistically, 37% in Alternative 3. The FEIS should reflect phased build out based on historic development data so that decision-makers and the public can use that information

to select a Preferred Alternative. On the contrary, the aesthetic visual analysis for Wilburton (pages 6-19 to 6-50) show a 100% buildout without distinction from undevelopable sites such as parks or wetlands. Without a disclaimer or clarification, we are concerned that the massing images shown will cause confusion and alarm.

- **Study Barriers to Fully Achieve Housing Capacity:** While we understand the primary requirements of an EIS is to identify growth target distribution approaches and evaluate the impacts of growth distribution, we believe there are gaps between zoning capacity studied in the EIS and what might actually get built after factoring in floor-to-area (FAR) ratios and development standards. Alternative 3 allows for 95,000 housing units but the DEIS does not specify FAR assumptions for any alternative which could dramatically alter actual unit output and development feasibility. It would be helpful for the city to clarify FAR assumptions used for modeling. The city should also analyze other potential barriers to fully achieving the housing capacity numbers, including development standards and parking requirements. For example, if zoning allows for residential development to achieve a certain height, other factors such as landscape buffers or setbacks may render it less feasible to fully achieve or max out on the development capacity. It would be helpful to understand how those factors might impact the city's ability to realistically meet housing targets.
- **Catalog Publicly-Owned Surplus Land Suitable for Affordable Housing Near Transit:** Through Amazon's Housing Equity Fund, we have invested \$514 million in loans and grants in the Puget Sound region to create and preserve 5,200 affordable homes for families making between 30% and 80% of Area Median Income (AMI). In Bellevue, we have increased the restricted affordable housing stock by approximately 20% as of August 2022 and continue to increase that number by supporting 233 new affordable housing units near Bellevue's 120th Street light rail station. Through our experience over the past few years, we have noted that increasing land costs presents further challenges to bringing more affordable housing online. It would be prudent for the city to identify publicly-owned land that is underutilized or surplus, particularly in Mixed-Use or Neighborhood Centers, and designate them as potential sites for affordable housing.
- **Bolster Mitigation Measures under Transportation:** We believe the stated Avoidance, Minimization, and Mitigation Measures in Section 11.6 is a good starting place to reduce the significance of the adverse impacts identified in the Action Alternatives. However, while we support building out pedestrian and bicycle network per the city's Mobility Implementation Plan, we encourage the city to consider additional vehicle and road-focused solutions to mitigate impacts on System Intersection V/C ratios, Primary Vehicle Corridor speed, and state facility LOS. For example, page 11-132 states, "vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps." It would be helpful to clarify what those potential vehicle capacity expansions could be and how it might mitigate the adverse impacts.
- **Add Mention of the Grand Connection I-405 Non-Motorized Crossing Throughout the Transportation Chapter:** Given the City of Bellevue issued a Request for Qualifications for consulting firms to conduct preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing in April this year, the DEIS should include mention of the project in the Transportation section. This includes, but is not limited to, the following references:
 - In section 11.4. Regulatory Context, add mention of the I-405 non-motorized crossing within the list of 'Relevant Plans and Policies'.

- Clarify on page 11-43, under I-405 Corridor Program, whether the I-405 non-motorized crossing is counted as one of eight new pedestrian and bicycle crossings over I-405 referenced in that section.
- In Mitigation Measures M-TR-1, 2, and 3, reference Eastrail and I-405 non-motorized crossing as key strategies to expand pedestrian and bicycle network.
- Under Section 11.5.1, clarify if the Grand Connection I-405 non-motorized crossing between City Hall and Eastrail is assumed to be to be in place in at least one of the Action Alternatives. Also clarify whether in Alternatives 1-3 in the same section, which specific new multimodal connections in the Wilburton study area were included in the system performance modeling.
- **NE 6th Street Extension in the Wilburton Study Area:** Under Alternative 3A in the Wilburton Study Area (page 11-110), we agree with the city’s analysis that a NE 6th Street extension to 120th Ave NE with an at-grade intersection at 116th Ave NE and Eastrail would greatly impact the experience for Eastrail users by adding another trail crossing and new modal conflict. We support a NE 6th Street extension to 116th Ave NE for local East-West access, not limited to HOV access to I-405.
- **Incentivize Trail-Oriented Development along Eastrail and Grand Connection I-405 Crossing:** As mitigation to aesthetic impacts in the Wilburton Study Area outlined in Chapter 6, we suggest the city consider incentivizing trail-oriented development along Eastrail and the Grand Connection I-405 non-motorized crossing. For example, Section 6.5.3 “Other Proposed Mitigation Measures”, only references adding more regulations and requirements that could limit a project’s flexibility to best deliver trail-oriented design on the ground-level. Adding incentives to the toolbox of mitigation measures could ultimately help realize the Wilburton vision.

Once again, we want to thank the City of Bellevue for your consideration of these comments. We appreciate Bellevue leadership and staff’s work on this periodic update. We look forward to working together to ensure Bellevue is not only prepared for future growth, but is well positioned to continue to thrive and be a fantastic place to live, work, and play for all. Should staff have any questions or would like to discuss these comments further, please contact me at phleung@amazon.com.

Sincerely,



Pearl Leung
Senior Manager, Public Policy
Amazon

CC:
Bellevue City Council
Brad Miyake, City Manager, City of Bellevue
Diane Carlson, Deputy City Manager, City of Bellevue
Michael Kattermann, Director of Community Development, City of Bellevue
Emil King, Planning Director, Community Development Department, City of Bellevue
Liz Stead, Interim Development Services Director and Land Use Director, City of Bellevue



PLUSH COMMITTEE

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Reilly Pittman
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450 110th Avenue NE
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Via Email: compplan2044eis@bellevuewa.gov

Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS
Bellevue Chamber PLUSH Committee Comments

Dear Reilly:

The Bellevue Chamber and PLUSH Committee applaud the City of Bellevue for the projected capacity, building heights, and thoughtful analysis proposed in the DEIS. The alternatives proposed target significant amounts of employment and housing in close proximity to transit, which will serve Bellevue's growth well in the next twenty years. The length of this comment letter should not indicate a poor opinion of the City's work—to the contrary, PLUSH considers this to be a strong document—but as a reflection of the wide range of topics the City is pursuing to improve its ability to handle growth in Bellevue.

PLUSH would like to submit the following comments to the DEIS:

- **We strongly endorse Alternative 3. Alternative 3 best accommodates housing that must be built in Mixed-Use Centers.**
 - Bel-Red, Wilburton, and Downtown accommodate most of Alternative 3's growth. This is true "smart growth" as placing most of Bellevue's growth in Mixed-Use Centers and surrounding transit will minimize traffic impacts by leveraging transit investment in these TOD areas.
 - Taller heights incorporated in Alternative 3 (above 16 floors) allow density to spread out vertically, rather than sprawl horizontally. Higher building heights can translate into more open space and human-scaled ground planes. Taller heights also enable high-rise building typologies to be more feasible economically than height limits between 8-16 stories.
- **General Questions and Comments:**
 - What are the DEIS's "informed build-out" assumptions? How is developable and re-developable land defined? Please provide this in the FEIS to determine that impacts were studied adequately.
 - What are the DEIS's FAR or density assumptions for the alternatives? Please provide these details in the FEIS to help inform our analysis of the impacts that were studied.

- We understand that an economic analysis was included in the study of the affordable housing options, and possibly in the study of the informed build-out assumptions. This economic analysis should be attached as an appendix in the FEIS so that economic assumptions can be publicly reviewed.
 - What was the City's methodology/criteria used to designate new land use designations? Particularly with respect to the MU-L and MU-M designations in Neighborhood Centers? We understand the City may not have accounted for frequent transit proximity in identifying these designations. If that is the case, the Preferred Alternative should revisit these designations and identify sites for MU-M if they are within transit proximate areas.
 - The property at 12th and 8th, known as Evergreen Court and Glendale is listed at 16 floors in Alternative 2 but only 7-10 floors in Alternative 3. Please state the difference in assumptions and the outcome; is this reduction of height related to affordable housing assumptions? We prefer the higher density on this property in Alternative 2.
- **Uses / Mapped Land Use Designations:**
 - We recommend studying a more agnostic mix of uses between residential and commercial uses in Mixed-Use Centers in the FEIS. In Mixed-Use Centers, consider allowing residential and commercial generally interchangeably, rather than tightly controlling uses. This will greatly simplify the Land Use Code and drafting of future regulations, and result in a code that is more responsive to market conditions. While we recognize and strongly support housing as a priority, the overall velocity of both commercial and residential projects will increase as flexibility increases.
 - Consider the wide application of a "Mixed-Use" zone in the Mixed-Use Centers. For example, is there a reason to have East Main-focused, Wilburton-focused, Bel-Red-focused, and Eastgate-focused separate land use codes? Utilizing one "Mixed-Use" zone in each of these centers will give the City the ability to more easily and quickly rezone centers. It would also result in permitting efficiency as staff would have fewer zoning designations to apply.
 - Study a less prescriptive approach with Comprehensive Plan map designations. Currently there are 53 different land use designations listed in the Comp Plan cityside (page 653). For example, in Wilburton, rather than including individual designations on each parcel, consider determining the whole area as "Wilburton Mixed Use Center" in the Comp Plan. Consider including a range of implementing zones that can be utilized to implement the Comp Plan map. Similar approaches could be used in Downtown and Bel-Red. Decoupling the Comp Plan/FLUM from the zoning map is allowed by the Growth Management Act and allows flexibility in zoning in the future.
 - Office ("O") zones are not designated for any growth, nor for any ability to have more flexible uses or additional FAR in Alternative 3. We consider this to be a lost opportunity in the 20-year horizon; these 1-2 story office buildings are the buildings that are being hit the hardest by the current office leasing crisis (these buildings are most often older Class B office). This is an opportunity to incentivize development or reuse of underutilized buildings/properties in areas typically close to transit or major arterials. Please study the ability to do all residential / mixed use buildings in the O zones, with heights up to 6 stories, and up to 4 FAR.
 - Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Bellevue Way corridor may have more transit in the future running locally between Bellevue and Kirkland. As a major arterial, particularly north of Bellevue, there

should be additional density considered in this corridor in the 20-year horizon. Consider the R-High designation or an MU designation along this and other similar corridors.

- We support the creation of a medical / hospital district surrounding Overlake and to the north—consider sufficient densities and heights that will allow MOB and life sciences to develop. Consider allowing some residential, retail, R&D and other supportive uses in this subarea to support hospital workers and those needing to stay longer term for medical treatment; Bellevue currently lacks these housing options near the hospital. Given the current lack of traditional office market, medical office/lab space is more likely to develop in the short term. Consider adding more space to the Wilburton Study Area (north of 12th) that is designated for medical use to allow for these properties to develop in the shorter term.
- Please study higher densities than currently shown in Alternative 3 in the areas along 520, south of NE 24th, along Northrup Way, and near the border of Redmond’s Overlake Urban Center (especially at the intersection of 156th and Bel-Red Road). These areas are currently designated generally MU-L, which would only allow low-rise buildings in a mix of 2-4 stories. BR-GC is also only 1-2 stories. Extend Bel-Red zoning to these areas with the BR-MU-M designation or a similar zone. Again, in the next 20 years it is very likely that the buildings along 520 will need to be redeveloped. More density will also fit better with the future context. For example, on the Redmond side of the of NE 20th and 148th intersection, Redmond is planning for high density/25-story towers. Bellevue should match the height and density that Redmond is planning in Overlake in border areas. These are areas of potential growth that do not impact single-family neighborhoods or lower density zones, and placing growth in these areas could be traded for growth currently designated in neighborhood centers that may also be not well served by transit or create problematic transitions to single family zones.
- Please study a higher density for OLB zones (OLB and OLB2). It is our understanding that OLB zones will be a part of the Phase 2 code amendments. In Eastgate, a large area of OLB exists along the freeway, up 139th and in the vicinity of 161st. Is there a better designation for this area given its proximity to Bellevue College and its need for housing? Or is it more appropriate to add density to OLB zones and keep this area OLB? Consider a more flexible zone like an MU zone in the Eastgate area.
- Along 116th south of Downtown, please study a “future vision” for this area rather than designating generally what exists today. This area is close to downtown and is served well by transit near SE 8th. For example, consider whether an LI zone should remain in this area for the next 20 years?
 - Study all center boundaries and ensure parcels are not split zoned (half in centers, half out). For example, on the southwest corner of the downtown boundary, parcels are split zoned downtown and R. This inhibits development in a key corner of downtown along Old Main. Similar conditions may exist in the other centers, particularly in Eastgate. Please review these edge conditions in all Centers and ensure parcels are adjusted to be fully in or out of Centers. Review Centers and determine whether they should be expanded slightly given context.
- The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management

Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS should evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan's vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS should evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.

- **Aesthetic Visual Analysis – Wilburton.** (pages 6-19 through 6- 50): We have concerns that the massing model may appear to overstate the density possible in Wilburton. The public could misunderstand what these models represent failing to understand that the EIS needs to show 100% re-developable build out to show a “highest-growth case scenario.” Understandably, the massing doesn't reflect existing property configurations and shows built form on unbuildable wetlands, the existing substation, and does not leave space for planned city parks and the planned bridge for the Grand Connection, all of which would reduce the extent of built form. The City should also develop more realistic propensity diagrams that take into consideration these real-world conditions so that the public has more accurate information to gauge impacts. We feel the EIS should also include additional written explanation to accompany the current diagrams. We suggest inserting the following:

Please note these massing diagrams represent 100% development capacity expressed as built form for each alternative. Many property and land-use determinants that would reduce buildable areas were not considered when creating these diagrams. There is no real estate development precedent to support 100% build out as shown in the next 25 years.

- We also caution the City against increasing transition zones in the Mixed-Use Centers. In a City, fewer step-down transitions are expected. Transition zones are better suited adjacent to single-family zones, and the City should consider whether the reduction in density currently deployed by transition zones is an effective approach to “mitigate aesthetics” or whether it simply stops redevelopment from occurring.
 - The mitigation related to viewsheds should be tightly defined and controlled. Private views are not protected by SEPA, and any public views to be protected should be very specifically defined.
 - We are concerned about mitigation related to “Aesthetic Impacts” that will further reduce the efficient creation of density. We strongly suggest that such mitigation measures be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85' should be allowed larger floor plates, and residential towers above 85' should be sized such that residential units can be delivered more efficiently (upper-level setbacks add cost to structures). The City should not look to current upper-level tower limits, but instead, look to the market to inform the most efficient forms to avoid adding unnecessary cost to projects. Inserting a cost/benefit analysis of potential mitigation measures may assist decision-makers. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation.
- **Critical Areas/Stormwater/Trees.** The City should analyze impacts to critical areas; the current 4-page memorandum in the Appendix is insufficient. The City should study implementation of the following:
 - Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made

steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue and does not reflect best available science.

- The “critical areas penalty” should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review.
- The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20-or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decision makers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City’s current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue. The City must also recognize that areas of Sturtevant Creek in Wilburton are on WSDOT property within the “limited access area” that is highly regulated by FHWA and no daylighting or additional mitigation may be possible in these areas. The City should account for this in the regulatory context section of the FEIS.
- The FEIS should study the loss of housing units and consequently affordable housing if the current critical areas requirements remain; these impacts should be disclosed to decision-makers.
- The FEIS should study the use of Mitigation Banking.
- The FEIS should study alternate stream designations such as the “Urban Stream” designation used by the City of Woodinville, these designations recognize that even a salmon-bearing stream can be properly protected in an urban area without large 100-foot buffers, and that it may actually be positive for stream function to incentivize improvement of current stream function.
- The FEIS should study properties in Bel-Red and Wilburton that are most impacted by critical areas and determine whether redevelopment will be possible given current critical area requirements.
- The FEIS should study alternate forms of mitigation and ways in which the sites most impacted could still re-develop. If the critical area requirements are so onerous so as to prevent any re-development from occurring, then the critical area will never realize any improvement, which is exactly the opposite of the intent of the critical area requirements.
- Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the Comprehensive Plan and subsequent LUCA amendments are in place. The City should complete a supplemental FEIS analysis on tree impacts following Comprehensive Plan implementation and disclose how any tree ordinance could impact the density assumed in the FEIS. All Mixed-Use Centers should be exempt like downtown is exempt.

- Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton or Mixed-Use Center regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

- **Housing Affordability**

- Any approach to affordable housing must be legal. Affordable housing requirements cannot exceed the impacts created by new development, and must meet the requirement of WAC 365-196-870, that increased density can be achieved given the affordable housing requirements and other development regulation constraints.
- The City should also consider itself as an essential partner in the housing affordability issue. Rather than focusing solely on market-rate developer-created funding or housing, which is generally limited to 80% AMI and above, the City should explore and disclose in the FEIS the many tools it may deploy to address housing affordability, such as a housing levy, housing vouchers, impact fee waivers for market-rate units that have performed inclusionary housing at a lower AMI, parking reductions, expanded MFTE, expedited land-use and building permits, financing programs and resources, making underutilized or surplus public properties available, raising SEPA thresholds, etc. and other ideas. WAC 365-196-870 requires the City to review and apply these incentives.
- The FEIS should include each affordability program applied to each alternative to show decision makers the relative efficiency of each program. There is no housing production data associated with the different programs or alternatives, please provide this data in the FEIS.
- The FEIS should recognize that inclusionary zoning housing policies need a sustained level of market-rate development in the local market or IZ policies will not generate a meaningful number of new affordable housing units. In most cases, jurisdictions provide development incentives to ensure the feasibility of development projects affected by an IZ policy. The principal incentives are direct subsidies, density bonuses, tax abatements (MFTE), and reduced parking requirements. Individually, and especially in combination, these incentives can substantially enhance the feasibility of development projects affected by an IZ policy.
- The FEIS should disclose the option of a fee in lieu of developing IZ units, and the city can use those collected fees to support construction for lower-income households directly. Setting the in-lieu payment amount affects IZ outcomes. If the payment amount is set high, developers may not be able to feasibly support the in-lieu payments and will either be able to deliver the below-market units within a project or not build at all. Further, the fee needs to be context-oriented and calibrated with the bonus received to yield better results for both developers and policymakers such as considering market prices, development types, and macroeconomic conditions.
- To the extent that land use requirements and/or fee arrangements impact the building envelope or constructability of buildings, the city should conduct a more cumulative analysis of the effects. For example, land use incentives for affordable housing and childcare facilities must be considered concurrently to ensure they can complement each other.
- Affordable housing is just one "spoke" of the livable City wheel. Other needs that are often obtained via development projects include park dedications/fees, deep green development, trails, sidewalks and street furnishings, roads/road dedications, daycare, community facilities, and stream restoration. Depending on the extent of the affordability program, disclose in the

FEIS via an economic analysis the ability of a project to “do it all”— most projects cannot do it all, and will not develop if regulations are collectively too onerous.

- **State Legislation Analysis / General SEPA**

- SB 5412. This state law requires jurisdictions to exempt from SEPA review all projects that include one or more housing unit. Please include the required analysis according to the new RCW 43.21C.229(2)(d) such that Bellevue can comply with the state law and allow for streamlined permitting of residential units following adoption of development standards.
- HB 1293. This state law requires jurisdictions to apply only “clear and objective development regulations governing the exterior design of new development” and limits design review application to only the exterior of buildings, not interior uses. Design regulations also may not result in a reduction in density, height, bulk, or scale below the applicable development regulations for the zone. Compliance with this state law is required within 6 months of the adoption of the Bellevue 2044 Comprehensive Plan. Please incorporate analysis of this state law within the Preferred Alternative as it relates to the adoption of Wilburton Design Guidelines (p. 6-63), as well as mention of the new state law regarding all other applicable design guidelines and how these must be augmented to meet the requirements.
- SB 5290. This state law requires consolidated permit timelines. The City should include study of the following items that would significantly streamline permit timelines:
 - Define SEPA thresholds for changes of use / procedures for change of use more clearly and increase SEPA thresholds generally for commercial uses.
 - Eliminate parking requirements for changes of use; allow existing nonconformities to continue; this will allow for the more flexible use of existing spaces.
 - Allow an administrative land use exemption process to modify issued MDPs between uses; this will allow for a better reuse/adoption of existing MDPs in an era when permitted office spaces may not be built.
 - Standardize the permit review process for both land use and technical (building, utility, shoring) permits; currently many different permits are reviewed in different ways with corrections being emailed rather than stored on the permit system. Study ways to make the clear and grade permit process happen more smoothly and more predictably.
- In general, the FEIS should include a basic statement about what the FEIS mitigation suggestions are, and what they are not. Under SEPA, impacts of the proposed action have already been determined to be significant. SEPA does not require impacts to be mitigated to a level of non-significance as part of the FEIS process. As such, mitigating measures are suggestions only, and are not required by SEPA. Decision-makers and the public should be made aware of this distinction.
- As of January 2023, parking is no longer an element of the environment required to be reviewed by SEPA. The FEIS should recognize the connection between car usage and free ample parking (free parking promotes car usage) and should continue to discuss parking policy in the context of transportation mitigation.

- **Transportation**

- For Wilburton, we believe SE 6th should be extended only to 116th, not to 120th. The DEIS shows that there is almost no difference between the traffic impacts of Alternative 3 and 3A, and that traffic may be a bit worse for the extension option. In addition, the impacts to Eastrail of another crossing are not acceptable.

- Prioritize the Grand Connection’s connector bridge as an essential public investment in a broader range of mobility choices. The usefulness of the Eastrail system is contingent on this link to downtown. This connection should be a top priority in city funding; SB 5452 has been passed allowing pedestrian and bicycle improvements to be paid for by transportation impact fees. Further, consider the use of zoning incentives in the bonus amenity program for adjacent sites to respond.
- Figure 11-28 shows a street grid in Wilburton. Just as in Bel-Red, we have significant concerns about a road grid that does not reflect property boundaries or the City’s ability to effectively deliver the road grid in an efficient manner. The City should study whether a built out road grid in Wilburton would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is actually necessary from a transportation standpoint. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.
 - It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. The Chamber supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
 - We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
 - Similarly, in Bel-Red, we believe that the existing “required” road grid should be studied and reconsidered. It does not appear that completion of the road grid is a component of the transportation analysis. In general, it has been exceedingly difficult to obtain a road grid in Bel-Red, again due to the fact that the proposed road grid had no regard for property boundaries or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.
- **Mitigation**
 - **Commercial displacement.** Requiring displaced businesses be given a “right to return” or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement and sign permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City’s idea of an “MFTE” program for small business locations is a creative idea that could result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS such that decision-makers can truly weigh and balance the relative benefits of such mitigation measures.

- **Noise.** Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in large swaths of the City. The impact of such mitigation measures should be studied and disclosed in the EIS. As an alternative, we suggest raising the dBA to make Bellevue consistent with other cities that have high-rise buildings near these arterials. Seattle is one example of this.
- **“Air quality buffers”.** The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would seem that this mitigation is better placed in the “environmental health” section, as the DEIS identifies freeways as an environmental health hazard. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. The City has identified a significant impact without an applicable threshold and without taking into consideration the impact of transportation mitigation measures on GHG emissions. This analysis is flawed and must be updated in the FEIS. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton, Bel-Red, Factoria, and Eastgate would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The FEIS should eliminate this recommendation.
- **Greenhouse Gas Emissions.** The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will soon shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City’s published Environmental Stewardship Plan, the FEIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code. This should be done while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure. Incentives to incorporating district energy systems should be explored in zoning codes and in the FEIS.

Since building form and bulk controls influence multiple chapters in the DEIS, the Chamber recommends the following adjustments to LUCA development standards be considered in parallel with the Comp Plan Update and studied in the FEIS as much as possible. Many of the standards addressed below are currently barriers to housing production and positive economic development.

1. **Plan BelRed and Wilburton Concurrently.** Continue to simultaneously plan for Wilburton and BelRed as both areas are concurrently responding to the light rail investment and both areas have tremendous redevelopment propensity. As you shape the LUCA amendments, we urge you to update these areas with common development standards and incentive programs. These neighborhoods can and will evolve as distinct districts and subdistricts, but the approach to land-use and zoning controls should have the same underpinnings. This amendment process is a great opportunity to make the

code more consistent, concise, approachable for the public and more workable for the city staff and the real estate development community.

2. **Revisit the 53 land use designations in the DEIS.** We suggest reducing these in number and making them more “use-agnostic” as mixed-use zones. Redmond is currently doing this in Overlake.
3. **Industrial Uses.** Consider eliminating future Industrial/Manufacturing uses in Bel-Red and Wilburton that create pollution, noise, or dust. These uses are incompatible with livable TOD neighborhoods at high-capacity light rail stations. Compatible light industrial uses could be a conditional use in certain perimeter locations while current industrial/manufacturing uses would remain until those properties redevelop. The existing use framework in Bel-Red has proven fair, and it should be retained and could be expanded to Wilburton.
4. **Floor Area Ratio.** Traditional floor area ratios do not translate well in Bel-Red/Wilburton due to a concentration of both extremely large and small parcels, critical areas, and lack of a street grid.
 - a. Eliminate Residential FAR. We believe residential development is better managed and ultimately encouraged by just using bulk controls (height, floor plate, setbacks, tower separation, etc.) and administrative design review rather than setting FAR limits. Some of Seattle’s SM-SLU and downtown codes use this methodology. Base/minimum FAR can still be used for calculating incentive programs, or the City could use a height model for incentives, like Downtown.
 - b. Commercial FARs should remain but be increased from current limits to utilize increased heights and floor plate limits. Specifically, commercial FARs should be increased within a quarter mile around all light rail stations. A balance of jobs and housing around all stations is key to create a vibrant station area, provide both daytime (office worker) and evening (residents) to support local retail, and to maximize the transit benefits and reduce vehicular traffic.
5. **Height Limits.** We applaud the bold heights proposed in the DEIS alternatives.
 - a. Exclude elevator/mechanical screens/stair overruns/solar panels/railings/parapets from floor/height limits and provide adequate additional heights or provisions for these important features. As energy codes evolve, even more height is needed to accommodate rooftop mechanical equipment and we encourage the City to be flexible rather than prescriptive with these standards.
 - b. Work with the building official and fire department to consider allowing “6 over 2” construction (6 levels of Type III-A wood frame over 2 levels of Type I-A concrete). This is allowed in Seattle and is a very popular and more feasible way of building rather than 5 over 3 construction.
6. **Floor Plate Limits:**
 - a. Commercial
 - i. No floor plate limit under 85’ tall
 - ii. Increase maximum floor plates on buildings between 85’ and 180’ tall to 50,000 SF to attract more national/international tech, medical and life science users.
 - iii. Heights over 180’ – 24,000 SF Floor plate.
 - b. Residential - Size by typology to allow efficiency and better feasibility as follows:
 - i. Midrise to 85’ Unlimited

- ii. Highrise 85' to 180': 20,000 SF
 - iii. Highrise above 180': 12,000 SF
 - c. Allow averaging of floorplates above and below the sizes listed above.
 - d. Create new design guidelines and administrative design review for modulation, articulation, top expression, etc.
- 7. **Upper-Level Setbacks and Step Backs.** Eliminate this standard for midrise and make it only a design guideline for tower buildings over 85' tall. This would enable better feasibility and more housing production. Step backs force large, inefficient units that do not stack, which can prevent projects from pursuing MFTE. Using design guidelines to allow flexibility and case by case/ site specific/ context/ affordability/ materials/ modulation issues can be considered. Also, when the setback is required for towers, raise the podium transition height from 40' to 48' so taller floor heights can be achieved in a 3-story commercial or 4 story residential podium with higher retail ceilings at the ground level.
- 8. **Parking:**
 - a. Ratios: Reduce or eliminate minimums. The market will provide parking as necessary and affordable housing projects near high-capacity transit and unusual shaped properties can respond appropriately. We support the DEIS's page 74 statement on parking that *"...Bellevue should focus on...parking code reforms to eliminate parking minimums near Link light rail stations, and potentially add further maximum parking limits..."*
 - b. Compact parking: Allow at least 50% of stalls to be compact, and up to 65% in Mixed Use Centers.
 - c. Allow additional flexibility (height, locations, exemption from FAR, exposure to public ROW) for above-grade parking where critical areas and high-water table are key development determinants.
 - d. Do not require additional parking requirements for changes of use; this will allow existing spaces to be re-tenanted more easily.
- 9. **Build to Lines.** Eliminate this requirement. We feel this is an outdated suburban planning tool that has historically been used to keep surface parking out of streetscapes. This is no longer necessary as new projects consistently create urban street wall conditions as they generally need every square foot of land to make projects feasible. Also, plazas and public open spaces are incentivized and encouraged, but the built to line standard requires granting a departure.
- 10. **Critical Areas, Manmade Slopes, Grading and Streams:**
 - a. Exempt all man-made slopes/grading from critical area setbacks. Allow for historic/natural grades to set criteria for critical area mapping and steep slope setbacks.
 - b. Reduce setbacks from manmade stream channelization or consider flexibility where streams have been altered.
 - c. Allow creative habitat and ecological solutions to be explored as an alternative to a linear setback.
 - d. Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
 - e. Alternate stream designations, such as the "Urban Stream" designation used by Woodinville should be adopted.

- f. Approve the use of mitigation banks in lieu of critical area setbacks. For example, The Keller Farm mitigation bank is already approved for the Lake Washington watershed (approved by Corps, Ecology, WDFW, EPA and Muckleshoot Tribe).
11. **Noise Ordinance.** Revisit the thresholds in the noise ordinance to better accommodate urban conditions.
12. **Lot Coverage & Impervious Surface Limits.** Allow 100% coverage in all Mixed-Use Centers and areas considered to be more urban zones, which is typical in dense, urban, and transit-rich areas. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
13. **Landscape Buffers.** Elimination of the 10' landscape buffer on interior lot lines. Building codes and fire separation will determine setbacks from lot lines and in most cases, assure setbacks if window openings are provided. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
14. **Multifamily Play Areas.** Current standards are too onerous. The market already demands/provides amenity space. Also, public investment in our parks system (including park impact fees) should be taking care of play equipment. We feel the public would rather have larger, high-quality playgrounds shared by all versus dozens of segregated, privatized ones that are mediocre.
15. **Bonus Amenity Incentives.** Beyond the current lists, consider including the following as Tier 1 Priorities:
 - a. Larger, family-sized units (2 & 3 bedroom)
 - b. Affordable and mid-market housing at 80-120%
 - c. Daycare/early learning centers
 - d. Green building/LEED/Passive House/Living Building Challenge / Salmon Safe
 - e. Enhancement, construction, public amenities, and active retail adjacent to the Grand Connection Bridge and Eastrail bike/ped network.
 - f. Construction of missing street grid (see below)
 - g. Allowing large properties to allocate a portion of the site to a non-profit development partner for a standalone affordable building and to receive credit for the affordable housing bonus as "on site" or "inclusionary" for the whole property.
16. **Street Grid Challenges.** Revisit the aspirational 660' square street grid in Bel-Red, which is based on the historic 1785 BLM Township and Range land divisions.
 - a. Consider the realities of topography (e.g., streets can follow contour lines rather than go off a cliff).
 - b. Look for ways the city can fund construction, better incentivize, or facilitate achieving this with multiple landowners to complete street segments already started.
 - c. Continue to include these easement areas as the FAR property basis. Flexibility and public funding may be needed to create useful and complete rights-of-way.
 - d. For unconnected spur streets - focus on creating interim uses rather than requiring full build out until adjacent properties can also respond. These include pedestrian connections, bike paths, shared or private fire access lanes on permeable paving and community uses such as playgrounds or pea patches.

e. Ensure that these challenges are also addressed in the Wilburton “street grid.”

17. Administrative Flexibility. In Mixed Use Center and Neighborhood Center zones, allow administrative design review departures from all standards aside from height and commercial FAR to ensure projects can best respond to their unique site conditions.

18. Large Property Flexibility & Discretion:

- a. Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and support an 18-hour neighborhood.
- b. Study allowing more flexibility and discretion in the application of key development standards for large properties with multi-building/multi-phase development with development agreements. These include:
 - i. Height averaging for towers to allow for a sense of building hierarchy, to better manage shadowing/neighbor impacts and to create an interesting skyline profile.
 - ii. Dedication of a portion of the site to a dedicated affordable building that would meet the entire properties requirement for onsite inclusionary housing.
 - iii. Open space consolidation with partial completion by phase.
 - iv. Allowance of “alleys with addresses” in areas of the City other than downtown that allow private roads to function as alleys that still access public roads. Introduce the new concept of a service alley that can consolidate back of house activities away from public and private streets and pedestrian activities, which will benefit the public realm and transportation system. Such service alleys would not have pedestrian facilities.

Thank you for the opportunity to comment on the City of Bellevue’s DEIS. The Chamber and PLUSH look forward to continuing this important work alongside City staff, the Planning Commission, and City Council.

Sincerely,



Jodie Alberts
Vice President, Government Affairs



Jessica Clawson
PLUSH Committee Chair





p 425.453.1223 f 425.646.6634
bellevuedowntown.com
10900 NE 4th St, Suite 250
Bellevue, WA 98004

June 12, 2023

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

Re: BDA Comments on Draft Environmental Impact Statement for the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To Whom it May Concern:

We are writing on behalf of the Bellevue Downtown Association (BDA) to share comments on the Draft Environmental Impact Statement (DEIS) that serves to identify and analyze potential unavoidable or adverse impacts and mitigation measures that could result from the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The City’s proactive policies and strategic investments in support of a thriving Downtown Bellevue has proven to be a highly successful and effective approach, supporting the long-term economic and cultural wellbeing of the entire City. Our comments reinforce this strategy and incorporate feedback from our BDA-member workgroup focused on the DEIS. Their discussion was framed by a set of principles for desired outcomes generated by the [BDA Board of Directors](#).

1. Balance uses to support sustainable growth and long-term viability.
2. Focus density around light rail and encourage transit-oriented development (TOD).
3. Promote flexibility to ensure plans can adapt to changing conditions.
4. Support maximum density to optimize development potential.

We recommend the City pursue land use Alternative 3 for both the City at-large and Wilburton study area as the preferred alternatives. The primary reason is because both options provide the most opportunities to increase development capacity for housing to match the City’s needs and support flexibility for neighborhood development based on changing conditions. Furthermore, the workgroup identified additional information to include in the Final Environment Impact Statement (FEIS) to ensure it provides a holistic body of information to help inform future work on the Comprehensive Plan policies and Wilburton Vision Implementation. If topics outlined in our feedback do not fall within scope of the FEIS, we request the City clarify what future initiatives and/or bodies of work will cover the desired information so that the BDA and its members can plan appropriately.

Our feedback is outlined under two categories: 1) City at-large, representing the DEIS information about the Comprehensive Plan Update and 2) Wilburton, representing the DEIS information about the Wilburton Vision Implementation.

CITY AT-LARGE

Requests for additional information or analysis to be included in the FEIS.

1. Analyze benefits and tradeoffs of development incentives versus mandates related to housing, particularly on affordable housing. The preferred alternative should not select a specific approach, instead it should recognize that an affordable housing program may be incorporated with the upzone, and it should study the pros and cons of each approach, including legality. The FEIS must also disclose all assumptions, economic study, and assumed number of housing units under the various programs studied.
2. Provide detailed information about how the multimodal transportation network will accommodate increased density, noting benefits and tradeoffs.
3. Clarify how the City plans to mitigate vehicular congestion impacts to meet performance targets and examine whether there are any significant impacts even if the identified mitigation measures are implemented.
4. Last-mile solutions will be critical to supporting the growth proposed in the land use alternatives. Provide more information about how transit and pedestrian pathways will be supported, noting benefits and tradeoffs.

WILBURTON

Key points regarding the Wilburton information and requests for additional information or analysis for the following topics to be included in the FEIS.

Key Points

1. Add specific information about the Grand Connection and Eastrail, including the future I-405 non-motorized crossing that is part of the Grand Connection. These major investments will shape Wilburton's future. The FEIS must reflect these multimodal improvements to support the growth alternatives and the neighborhood's future potential.
2. Recognize how Wilburton can be an important complement to Downtown that will develop as its own unique neighborhood over time with distinctive qualities and amenities. Examining the relationship between Downtown and Wilburton's potential is important information to supporting the vision's implementation.
3. Recommend NE 6th Extension project end at 116th Ave NE. If built to 120th Ave NE, the project could negatively impact both the Grand Connection and Eastrail, as well as future housing and commercial development. Furthermore, the FEIS should disclose the transportation benefits and tradeoffs of this connection to inform future decision making.

Additional Information or Analysis to Include in FEIS

1. Share more information on how to support housing production, particularly affordable and workforce. Include 1) analysis regarding benefits and tradeoffs of development incentives versus mandates and 2) details regarding which development standards hinder or promote building forms that support multifamily midrise housing.
2. Provide more details on how land use scenarios can leverage East Link, Eastrail, and the Grand Connection. Also, provide insights into development incentives that can leverage these major multimodal projects.
3. Include more information about specific areas of Wilburton to support future consideration of potential subareas.
 - Examine the development viability of the growth areas based on constraints and opportunities associated with topography, existing built environment, mobility connectivity and access.
 - Share how master plan developments of a large parcel or series of parcels can impact the area; note benefits and tradeoffs.
4. Examine conditions that would support dynamic places in Wilburton with vibrant 18-24-hour amenities and attractions.
5. Provide more information about how the proposed street network interacts with existing conditions, such as topography, parcel constraints, properties likely or not likely to redevelop, and tools/methods to advance neighborhood buildout.
 - Examine lessons learned from Bel-Red's rezone and vision implementation.
 - Study whether the proposed street network is necessary or beneficial for neighborhood mobility.
6. Provide more information on the air quality findings and how these findings will impact future development. Examine how potential buffers compare to Downtown and East Main mitigation measures and study how air qualities standards measure up to market-driven solutions.

We appreciate the City's effort to undergo an intensive process to examine existing conditions and collect community input. Thank you for leading the City's growth and continued support of Downtown.

Sincerely,



Patrick Bannon
BDA President & CEO



Matt Jack
BDA Director of Public Policy

From: [Barb Braun](#)
To: [PlanningCommission](#); [Stead, Elizabeth](#); [Johnson, Thara](#)
Subject: Observations June 21 Planning Commission Meeting
Date: Friday, June 23, 2023 11:57:21 AM
Attachments: [Comment on Planning Com Mtg June 21.pdf](#)

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June 21 Planning Commission Meeting

Barbara Braun
13609 SE 43rd Place

I appreciate all the work the staff have done on the Comprehensive Plan analysis to try to come to a Preferred Alternative that will allow density and affordable housing while maintaining our values such as livability, climate, tree canopy, open space, walkability, etc.

I would like to share a couple of observations from the June 21 Planning Commission meeting which I hope can be reflected upon and addressed. I give this feedback in a constructive spirit and a deep desire for Bellevue to remain a great place to live and work.

Observations

1. The Comp Plan is highly complex and is changing many, many things. At the meeting, it did not appear all Commissioners are up to speed on the Comp Plan or the staff's analysis. It is vitally important for the Commissioners to be adequately informed of the plan details and the analyses being performed so they can more meaningfully respond to the requests for decisions and guidance. Further the Commissioners should become familiar with the public input so the discussion can better balance the wants of the public with developer's advocacy. Perhaps a retreat or offline workshop can be conducted so Commissioners can be appropriately onboarded before we continue. Otherwise, I fear decisions will be made without complete information or in opposition to our values as defined in the Comp Plan scope.
2. The staff was advocating for a modified Alternative #3. Alternative #3 already allows for ~95,000 additional housing units, or a 2.7 times the amount we predict is needed (~35,000). Commissioners seemed to be pushing for capacity beyond 95,000 by allowing high rises in all density areas under the guise of "flexibility." If this is allowed, the result will be a mishmash of incongruous building types scattered around the city. This is in opposition to our values, will radically degrade neighborhood character, will not result in affordability, and will have unnecessary impacts such as greatly increased traffic congestion. Why are the Commissioners pushing for even higher density than is outlined in Alternative #3?

High rises are not in keeping with Bellevue's values:

- a. High-rises separate people from the street and do not create a sense of place or community.
- b. High-rises generally result in gentrification and inequality while low/mid-rises are better able to deliver affordability.
- c. High-rises create vertical sprawl and are shown to be harmful to human health.

Bellevue should not add density for density's sake. We should add only the appropriate density in transit hubs that allow for affordability while maintaining neighborhood character. Too much zoning "flexibility" will not achieve this goal.

3. There was a discussion about Mandatory Affordable housing. While developers will say they can't make money if mandates are in place, we must challenge that assertion. We do not have affordability today. Luxury housing is being developed everywhere. Mandates have been

effectively implemented in other cities and plenty of developers are participating.

If most of the new housing needs to be affordable, it is obvious we need to mandate it. If we don't mandate it, then we should not ask Bellevue residents to suffer the impacts of a high-density Alternative #3.

4. There is no provision for new open space. The Bellevue Technology Center is not needed for housing density. The land should be purchased and converted into open space or forest for Bellevue. This is a wonderful opportunity to create more equity in parklands in Bellevue in an area of lower incomes.

5. Wilburton was supposed to be a transit oriented, eco-neighborhood. It now looks like an extension of downtown with high-rise canyons and a lot of traffic. The recent development in Wilburton (REI, PCC, Trader Joes) is devoid of any sense of community or neighborhood character, is highly disconnected, and is unwalkable even though the buildings are next to each other. I hope more will be done to reduce roads and cars in Wilburton, and to create a truly world class pedestrian friendly neighborhood.
 - a. Part of Lake Bellevue should become a park and the shoreline should be accessible to the public.
 - b. The currently proposed OLB wetland should become a park with elevated pathways allowing for wetland education.

Thank you for your consideration,

Barb Braun

From: [Kevin Wallace](#)
To: [PlanningCommission](#)
Cc: [Johnson, Thara](#)
Subject: Request to Include Entire Medical Corridor in Wilburton Rezone
Date: Friday, June 23, 2023 12:37:57 PM
Attachments: [image001.png](#)
[image003.png](#)

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Commissioners,

I represent the investment group that owns the Washington Park office buildings immediately north of NE 12th Street and west of 116th Ave. NE (labeled "Wallace" in the drawing on the left below). The Future Land Use map provided at your Wednesday meeting indicates our parcels are within a small area designated BR-MO-H-2 (outlined in blue in the drawing on the right below). This is the only land in the entire city with this zoning designation. All of the land sits in between Childrens Hospital and Overlake Hospital, and is separated from other land areas by I-405 and Eastrail, so it makes sense to consider it as one area for planning purposes and provide it all the same zoning designation. However, the area spans NE 12th Street north and south, placing some of it in the Wilburton rezone area and some of it outside.

This email is to ask you amend the Wilburton area boundary to include all BR-MO-H-2 land within its borders so that all of this small area of land is subject to the same comprehensive plan policies and land use code provisions. Doing so will better enable the redevelopment of the area to achieve a consistent, cohesive result, and enable the properties to the north to be able to pursue redevelopment in a more timely manner. As it stands now, our property and the other parcels north of NE 12th Street would be included in Bel-Red, and ultimately subject to the Bel-Red land use code, while the properties across the street with the same zoning would be subject to the Wilburton rezone and the Wilburton land use code. In addition to the unwarranted delay it would cause (the Bel-Red land use code update is currently not even scheduled), it's likely that the Bel-Red land use code and comprehensive plan policies will be different from those in Wilburton, meaning properties across the street from each other with the same zoning designation would have to follow different sets of rules. This is unnecessarily complicated and time consuming. All of this small area of land with the BR-MO-H-2 designation should be subject to the same set of rules.

You might also consider including the entire BR-MO area (outlined in yellow below) in the Wilburton area. This would allow for cohesive planning of the medical corridor land, both north and south of NE 12th Street. All of the properties in the BR-MO area north of NE 12th have been waiting since 2009 to receive an increase in zoning that enables redevelopment. There is no basis for continuing to keep this land zoned at a 1.0 FAR, and the proposed zoning designations in the Future Land Use map are already well thought out. Modifying the Wilburton map to include this land in the Wilburton Study Area would enable earlier planning and redevelopment of the corridor with a cohesive and consistent set of rules.

330 112th Ave. NE, #200
Bellevue, WA 98004
425-278-6363 (Direct Dial)
425-802-5701 (Mobile)

Johnson, Thara

From: Todd Woosley <todd@woosleyproperties.com>
Sent: Tuesday, June 27, 2023 1:31 PM
To: PlanningCommission
Cc: TJ Woosley; Mr. David Woosley
Subject: Wilburton FEIS Preferred Alternative

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Planning Commissioners,

Your efforts to help craft a preferred alternative for further study in the Wilburton area are greatly appreciated. Thank you for considering retaining the building heights (25 stories) in the Wilburton Draft EIS's Alternative 3 as the heights in the FEIS's preferred alternative.

While concerned about the staff's proposal to lower these heights ten stories, we are cautiously optimistic the City of Bellevue will finally adopt the type of building heights, permitted uses and other Land Use Code provisions that would provide enough economic incentive to redevelop the Wilburton area as envisioned.

Therefore, we ask that you direct the City's staff to retain the Alternative 3 building heights for the Wilburton Final EIS for the area just south of The Spring District, east of Lake Bellevue, across 120th Avenue N.E. This area includes the four buildings of our family's property known as Brierwood Center.

We believe retaining the Alternative 3 twenty five story building heights, as well as the "Mixed Use" designation, will create the most incentive for existing properties to be redeveloped into the types of buildings the City of Bellevue anticipates will best accommodate Bellevue's future growth.

The Mixed Use High Rise 2 designation is also the most consistent with the principles established by the City, including proximity to high capacity transit service.

In addition, retaining Alternative 3's building heights would provide the capacity for forty percent more housing or office space (on the same parcel) as the staff's recommendation (which lowers the building heights by ten stories).

We also believe retaining the twenty five story building heights would lead to more housing units, not fewer, than fifteen story buildings.

To help you envision how this particular area could redevelop, as well as see it's location adjacent to The Spring District and central located between the Wilburton and Spring District's light rail stations, please watch the video below. It was prepared by the City of Bellevue's outstanding Transportation Department to help show the remarkable transformation of 120th Avenue N.E. from a two or three lane road to a five lane Complete Street (including sidewalks, bike lanes and five motor vehicle lanes).

The construction of the new Spring Boulevard and Sound Transit's light rail facilities are also shown in this aerial tour (which runs from north to south). Brierwood Center is just past The Spring District, east of Lake Bellevue, in the video.



Bellevue Transportation Dept 120th Ave NE
[youtube.com](https://www.youtube.com)

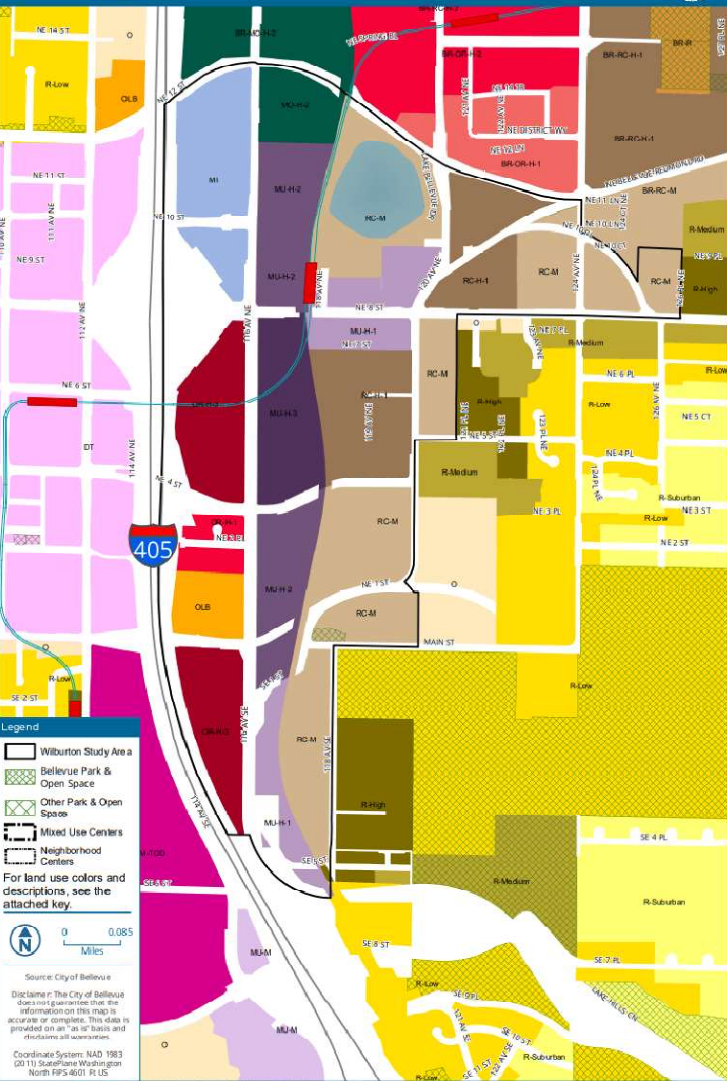
Sincerely,

Todd

Todd R. Woosley
Hal Woosley Properties, Inc.
12001 N.E. 12th Street, Suite #44
Bellevue, WA 98005
(425) 455-5730 #3 office
(425) 454-7150 mobile

Future Land Use Map: Wilburton Study Area

Land Use Categories

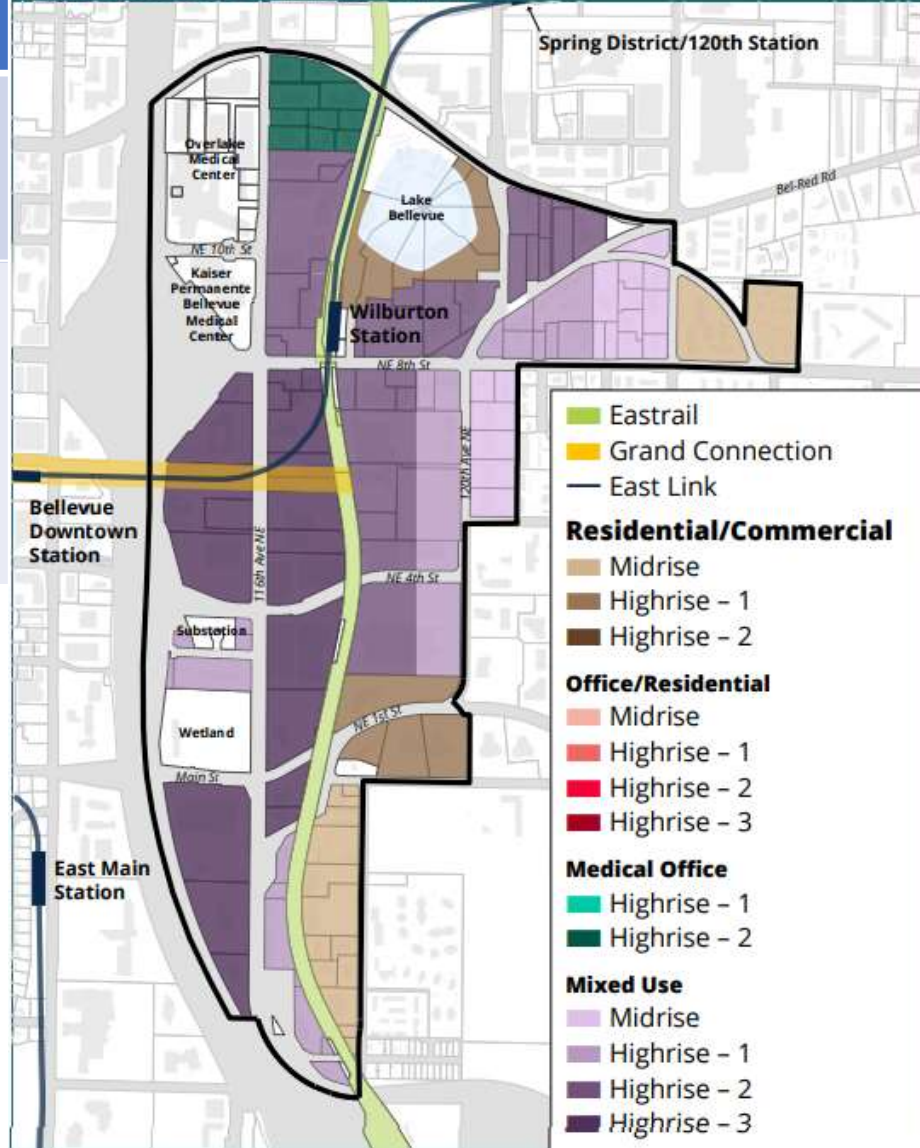


Alternative 3 vs Staff Proposal

There continues to be overwhelming support for Alternative 3 but the staffs suggested Preferred Alternative looks like Alternative 2.

We urge the planning commission to direct the staff to move forward with Alternative 3 as the Preferred Alternative without alterations and specifically to keep the building heights and uses the same for properties East of the Eastrail and North of 4th.

WILBURTON ALTERNATIVE 3



The yellow star represents the light rail station

The orange square in the bottom right corner is the nearest single family neighborhood. It lies behind the hill from all the other colored boxes and would not have sightlines to their development.

The green and blue boxes represent properties that had uses and heights restricted in the staff suggestions for Preferred Alternative from compared to Alternative 3.

We urge the Planning Commission to keep the heights and use designations from Alternative 3 for these properties and for the other properties East of the Eastrail and North of NE 4th.



We urge you to retain the heights and uses in DEIS Alternative 3 in the Preferred Alternative for the EIS for the properties East of Eastrail and North of NE 4th for the following reasons:

- Going with the height limits in Alternative 3 increases chance of greater housing supply.
- All of these properties are located
 - Within a quarter mile of at least one light rail station
 - Near or adjacent to the only Rapid Ride Bus line on the Eastside (which runs down NE 8th)
 - Near the rapidly growing Spring District
 - With direct or easy access onto The Eastrail
 - Along the recently improved 120th Ave NE (costs exceeding \$300m)
- The 'Mixed Use' designation in Alternative 3 allows for greater flexibility to react to a rapidly changing market.
- The current uses in the areas above are all in the 'mixed use' category and not the 'residential' in the staff recommendation and without special exemptions they could have difficulty continuing to operate.
- The topography of the area means that future development would not interfere with any view corridors for the nearest single family development.

For all these reasons we urge you to keep the use designations and heights for properties East of Eastrail and North of NE 4th

From: [Kristine Linn](#)
To: [PlanningCommission](#)
Subject: Input on the planning staff's preferred EIS
Date: Wednesday, June 28, 2023 7:48:25 PM

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Members of the planning commission:

I am the president of the board for 9 Lake Bellevue, a commercial condo office building directly adjacent to the Wilburton light rail station. As well as the office building, we own a large parking lot directly adjacent to the Wilburton light rail station, which would be a perfect location for a residential or mixed use, TOD development. Because such a building would have to incorporate enough parking to support our offices at 9 Lake Bellevue, we are concerned that the "RC-M" designation will not pragmatically support a residential development there. DEIS Alternative 3 allowed RC-H1—a more generous and flexible option, which will more likely allow development to pencil out. It would be a terrible shame to miss the opportunity to allow residential density next to the Wilburton station.

Kristine Linn
Attorney at Law

Law Offices of Sherri M. Anderson, Inc., P.S.
9 Lake Bellevue Drive, Suite 218
Bellevue, WA 98005
kristinel@smalaw.biz

This communication, including any attachments, contains information that may be confidential and may also be protected by attorney-client privilege or work-product doctrine. If you are not the intended recipient, please notify Kristine Linn and delete this message.

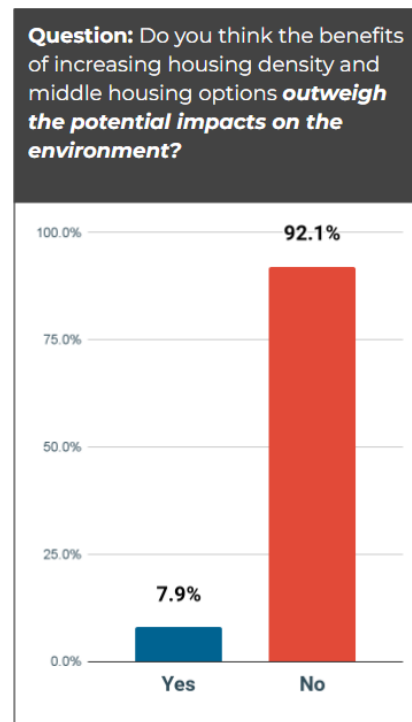
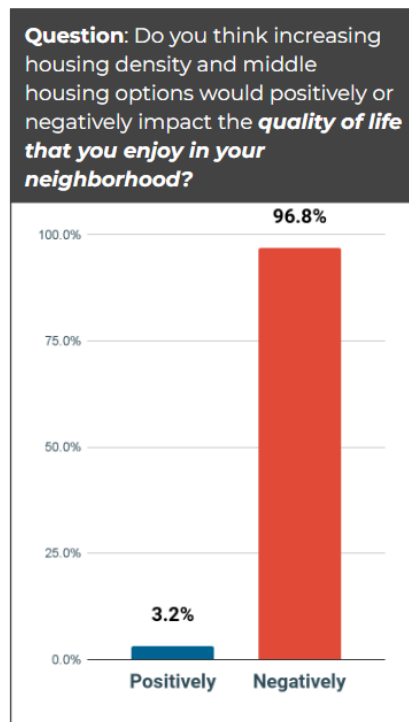
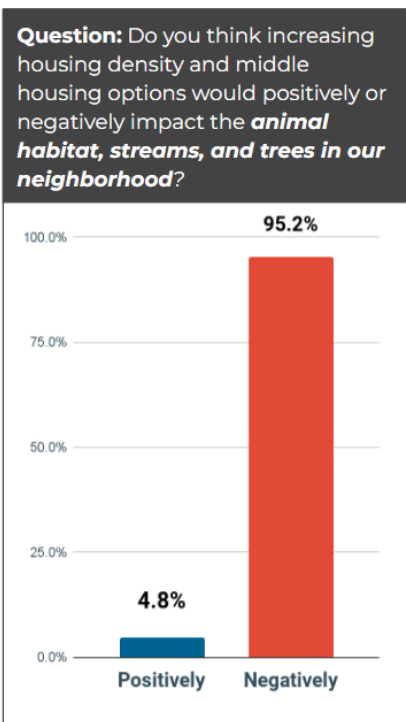
Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

My name is James Leguizamon. Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS.

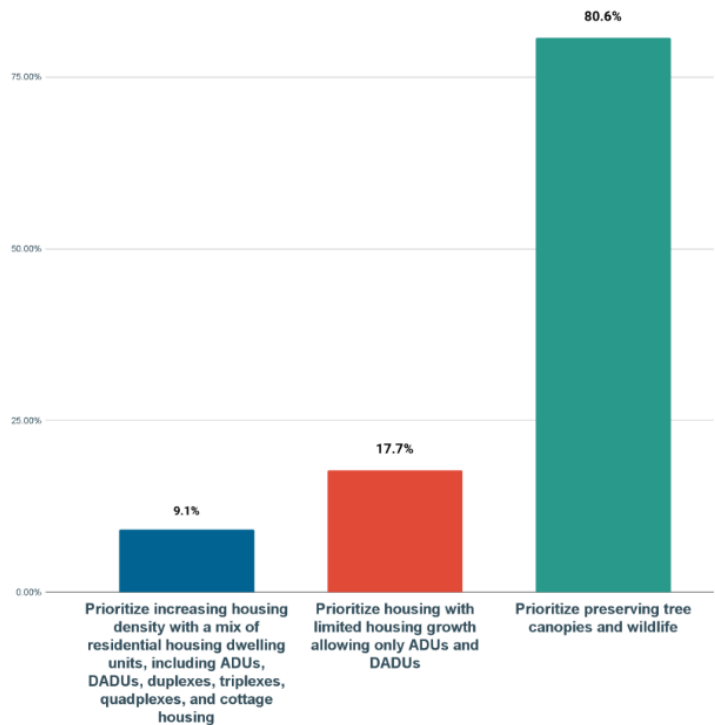
Neighborhood subareas next to major transit systems differ in character, density, landscape, and environment. A one-size-fits-all solution does not take into account the needs and characteristics of the affected areas and the impact it will have on residents' well-being, quality of life, and the natural environment. An approach tailored to meet our community's needs may improve the quality of life for all its residents.

Here are key priorities that our Wilburton neighborhood considers significant and important:

- Prioritize the preservation of Wilburton's environmental ecosystem as they are essential for the health and integrity of Wilburton's critical areas. A survey was undertaken, reaching out to every Wilburton accessible Wilburton home on our single-family residential streets nearest to Bel-Red. The survey results below show that the majority of residents prioritize the preservation of their neighborhood environment over housing density.



Question:
 If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**

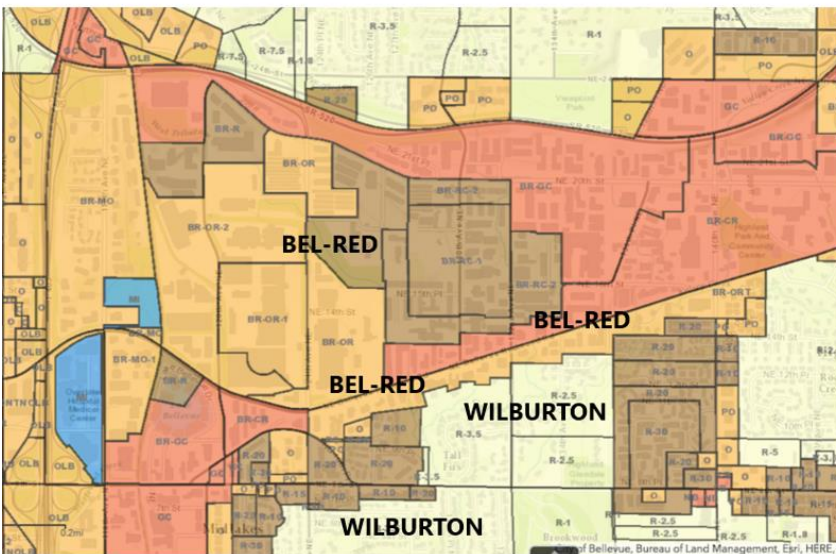


- Inform and ask Neighborhood Associations to reach out to their residents in an impartial, unbiased manner for input and feedback. Stress the need for an engagement process that allows ideas and avoids predetermined outcomes. This will ensure a transparent and inclusive process.
- Prioritize neighborhood residents who have vested interests in their community and are directly impacted. Bellevue residents encompass a rich diversity and a spirit of inclusivity and should be adequately represented.
- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the surrounding homes.
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
- Residential homes in critical areas need special considerations. The cumulative effects on critical areas need measured mitigation. The Wilburton neighborhood nearest to the Bel-Red development, for example, is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation of mature tree canopies are essential for the ecosystem in critical areas.
- Wilburton is one of the few critical areas remaining in the USA in a city with a similar population. Cumulative mitigations have not been established. Critical area residential zoning density should be maintained.

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
2. Consider that on average, individuals are likely to transition to different jobs, each in a different location approximately six times throughout their lifetime.
3. Employers are increasingly embracing remote work options and reducing their reliance on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider that reversing the environmental impact caused by such growth is unlikely to occur.

4. Alternative 3 does not ensure the job market and economic needs are met for different income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness secondary to drug use, susceptible to drug related crimes, and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued to live without jobs and homelessness.
5. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers using US Forest Service Inventory data show that increasing temperatures are causing growth declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere and mitigate the carbon dioxide by 25% while also removing air pollution, naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon fighting against rising temperatures. *(3) Alternative 3 will cause the greatest effect on changing temperatures in residential areas. Consider a tree code.
6. Preservation of mature trees are essential for cooling stream temperatures for all aquatic and land wildlife and are part of their sensitive ecosystem.
7. Prioritize science and data. Oppose a recommended over development one size fits all approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and minimum setbacks. These are not reasonable principles and certainly not based on science and data. A one size fits all approach is not considering neighborhoods with diverse types of land.
8. Ensure housing typologies and pace of growth within neighborhoods are properly aligned. Consider developing housing options that complement the scale and character of the different neighborhoods.



District	Designation
Bel-Red	
Bel-Red-Medical Office	Bel-Red-MO
Bel-Red-Medical Office Node	Bel-Red-MO-1
Bel-Red Office/Residential	BR-OR
Bel-Red Office/Residential Node 1	Bel-Red-OR-1
Bel-Red Office/Residential Node 2	Bel-Red-OR-2
Bel-Red-Residential/Commercial Node 1	Bel-Red-RC-1
Bel-Red-Residential/Commercial Node 2	Bel-Red-RC-2
Bel-Red-Residential/Commercial	Bel-Red-RC-3
Bel-Red-Commercial/Residential	Bel-Red-CR
Bel-Red-Residential	Bel-Red-R
Bel-Red-General Commercial	Bel-Red-GC
Bel-Red-Office/Residential Transition	Bel-Red-ORT

BelRed Development and Wilburton

The 900-acre BelRed development is less than a block away from Wilburton.

- By 2030, the BelRed 900-acre development is expected to generate 10,000 new jobs.
- By 2030 the BelRed development is expected to generate 5,000 housing units.
- 2,514 housing units are being reviewed for construction as of December 2022.
- 6,433 parking spaces are currently being reviewed for the BelRed housing and business development – (This will cause significant traffic, noise, and air pollution.)

The Wilburton Vision Implementation will include another growth development with another 5,000 plus additional housing units on NE 116th.

Wilburton will be affected by tremendous growth. I support the inception and reinstatement of the following Wilburton/NE 8th Subarea Plan Goals:

"Wilburton/NE 8th Subarea Plan Goals

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."

I also support the following the inception of **Land Use Policies** that aligned with the Wilburton/NE 8th Subarea Plan:

"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.

and the previous policies protecting and preserving Wilburton's natural determinants, Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays an essential role that provides residents with a profound sense of well-being.

Wilburton Natural Determinants Policies:

"Policies

POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.

POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.

POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."

Photos of the Critical Areas

Below are a few photos of wildlife in our cul-de-sac and photos of some of our critical areas in neighboring streets:



Red-tailed Hawk on neighbor's roof in Wilburton.



Another Hawk on a neighbor's Tree.



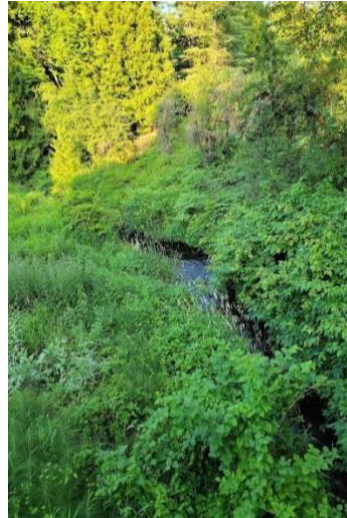
A Great Blue Heron, a Priority Species.



A Bobcat on my neighbor's Fence



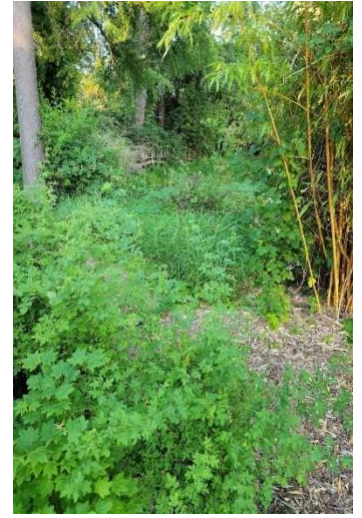
A Bald Eagle flying over my neighbor's roof.



The Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.



Kelsey Creek in our neighbor's yard was unusually dirty last week.



Marsh land under a bridge in a neighboring street on 132nd.

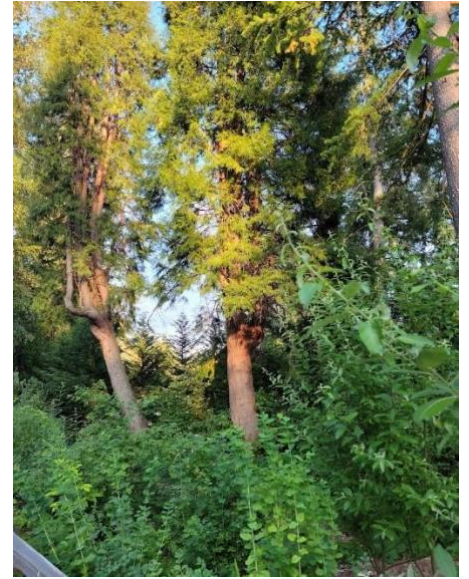
The neighborhood is in a critical area with many mature tree canopies. This area is being designated for R-Suburban, with single-family, duplexes, and cottage housing. Critical areas with many tree canopies would benefit remaining as low density housing (BCC 20.25H). Removing tree canopies negatively impact the already affected water and air temperatures, and the ecosystem and survival of Wilburton's wildlife. The sensitive ecosystem cannot be recovered with mitigation.



Tall Firs in Wilburton across of Bel-Red. Homes are surrounded by trees.



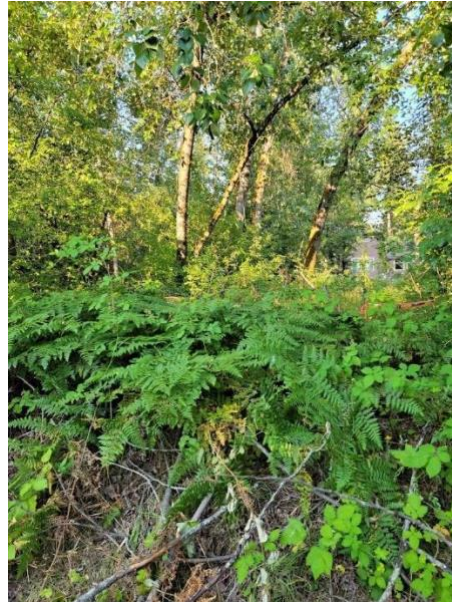
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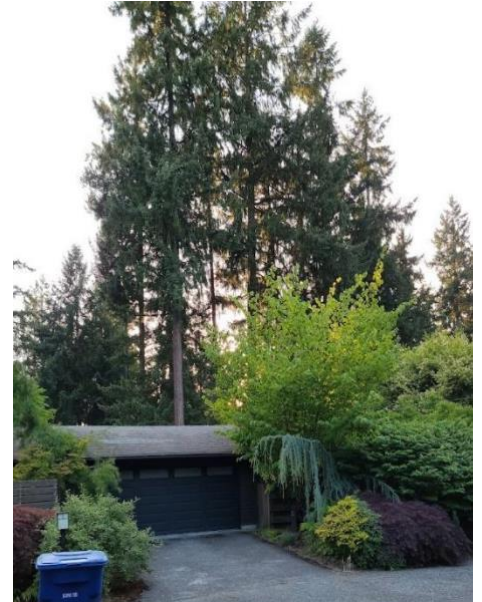
A backyard of a Wilburton home.



Dense tree canopies in the Wilburton area that cools water and air temperatures.



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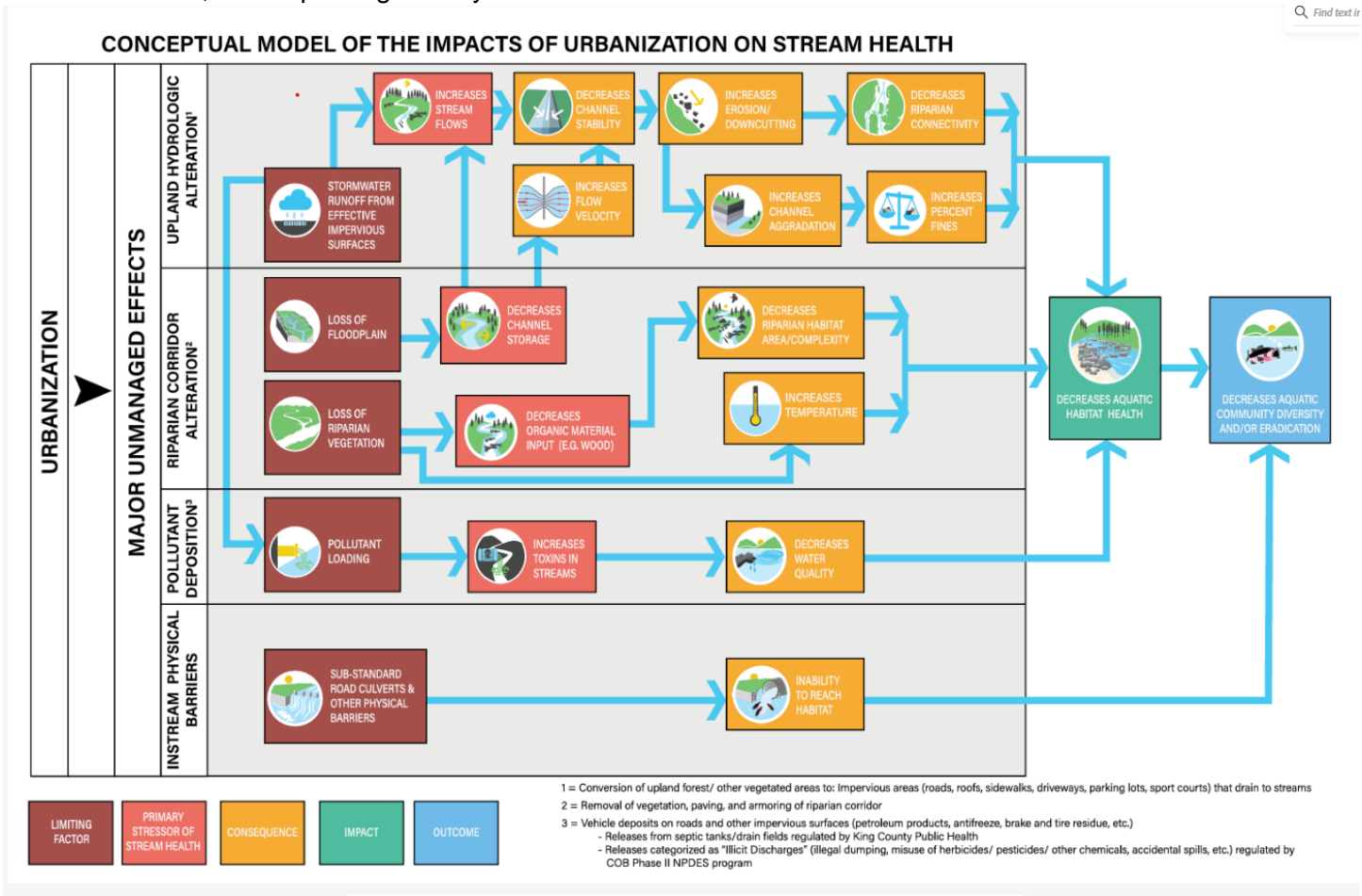
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Habitats for these species provide the food, water, nesting/rearing, and cover necessary to support their populations. Protected habitats include naturally occurring ponds under 20 acres, concentrations of dead trees, caves and roosting structures, and large stands of conifers.

Geological Hazard Areas

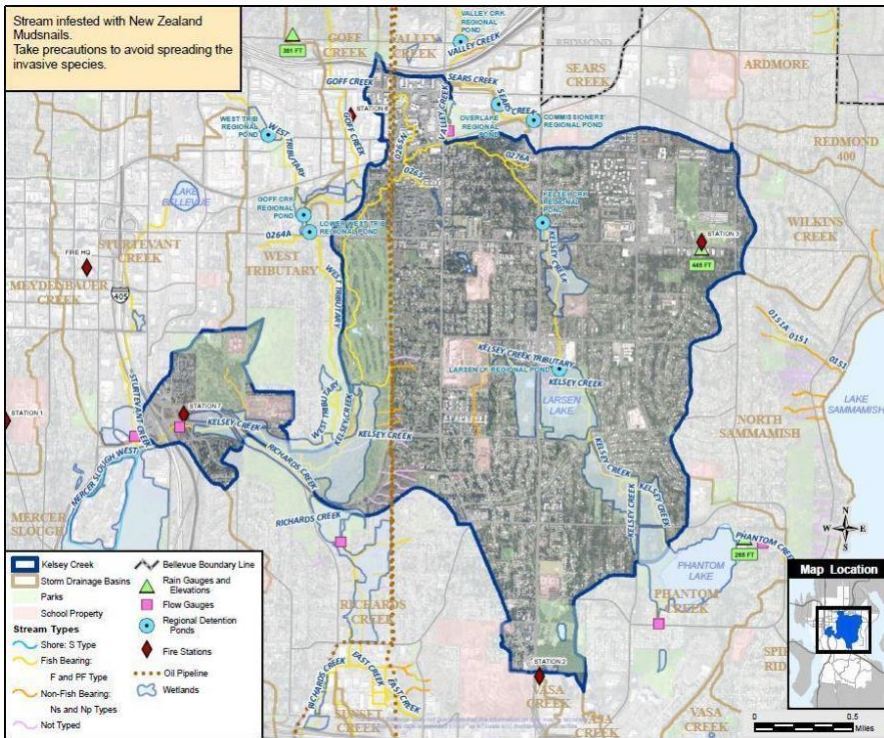
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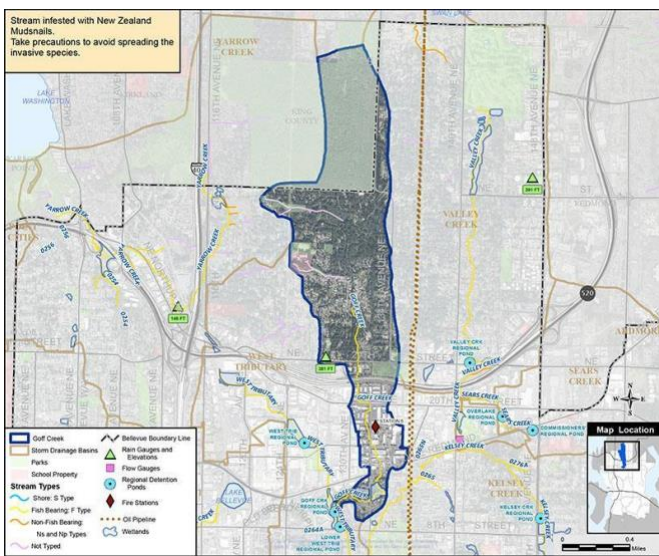
Kelsey Creek Drainage Details (City of Bellevue) *(2)

Salmon Present in the Basin

- Chinook*+
- Coho+
- Sockeye
- Cutthroat Trout

* Listed Federal Endangered Species

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)



Goff Creek – (City of Bellevue) *(2)

Salmon Present in the Basin

- Chinook*+
- Coho+

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 - Rainbow & Cutthroat Trout
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Our Wilburton subarea is expected to grow. We sincerely hope that measures will be taken to ensure the growth is accompanied by safeguards that prioritize the safety of our neighborhood and preserve the unique environment that makes Wilburton so special. Being one of the few areas with tree canopies in a city of this size in the entire USA, the preservation of our environment was a primary factor in our decision to live here. I appreciate the opportunity to work with our city to provide housing and an inclusive community.

Sincerely,



James Leguizamon

855 134th Ave, NE

Bellevue, WA 98005

310-367-3757

- (1) City of Bellevue Watershed Management Plan
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- (3) [Climate change: Trees 'most effective solution' for warming - BBC News](#)

The larger map can be found here:

bellevue.legistar.com



The area painted green is designated as BR-MO-H-2. I believe the entire area on the east side of 116th Ave NE, from NE 8th Street to Bel-Red Road should be designated as BR-MU-H-2. In other words, highly prescriptive zoning on the north end of the map as BR-MO-H-2 (green) is not going to initiate any new Medical Office Building (MOB) development in the next 20 years. I will list the reasons here:

- 1- As envisioned by the staff, multiple large MOB (300,000+ Sqft) are needed to address all the need for the medical community. One last building with this vision, The Pavilion, still has availability after 12+ years! And medical practices shy away from it because of its cost structure. I can only imagine any future MOB will have an even higher price structure.
- 2- Let's not forget, Overlake Hospital still has many opportunities to build large MOB's on its campus if and when the need arises. So there is no shortage of available land.
- 3- 90% of medical practices need between 1000-20,000 Sqft at a time. It takes a large number of tenants to lease one new large facility, and this makes it extremely speculative and risky.
- 4- Any new Mixed Use development can address these new needs as they present themselves. This makes development more predictable since other uses can make the development anticipate and allow for that use in their plans.
- 5- While BR-MU-H-2 allows for medical use, this effectively kills the need for any new large Medical Office Building in the BR-MO-H-2.
- 6- Highly prescriptive zoning has not worked in the past and we don't want to commit the same mistakes. The last rezoning of Bel-Red created medical office zones/neighborhoods with different intensities and heights. It was highly prescriptive and the intensity of development was associated with the proximity to the Overlake Hospital. Even with such careful designation, it did not inspire a single new development! Can you imagine downtown Bellevue being carved up as Hotel only, Office only, Residential only, Retail only? Modern forward-thinking cities are letting the dynamics of the market dictate how we should develop. I am sure if Medical Office Building is needed one will be developed to satisfy the need.
- 7- The need for new large Medical Office Buildings is exaggerated. I believe one large such building will answer the needs for many years to come. We conducted a study a few years ago, and we found medical tenants for 80,000 square feet. The rest was speculative development. The proposed designation offers 2,000,000+ Sqft of new Medical Office Building. Is this really needed? Was any study conducted to support it? The notion of build it and they will come does not apply here.

For all the reasons listed here I hope the commission will reconsider this recommendation and make the entire 116th Ave. NE south of Bel-Red a Mixed-Use neighborhood.

Finally, I would like to thank the commission for this opportunity to provide a feedback.

Sincerely,

John



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C, Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

The above e-mail may contain patient identifiable or confidential information. Because e-mail is not secure, please be aware of associated risk of e-mail transmission. If you are communicating with a Holistique medical provider,

nurse, or other staff members via e-mail, your acceptance of the risk and agreement to the terms and conditions for e-mail communications is implied.

The information is intended for the individual named above or a legal guardian. If you are not the intended recipient, any disclosure, copying, distribution, or use of the contents of this e-mail is prohibited. Please notify the sender by reply e-mail, and then destroy all copies of the message and any attachments. Please see our Notice of Privacy Practices at www.holistiquehealth.com

Please include me as a party of record.

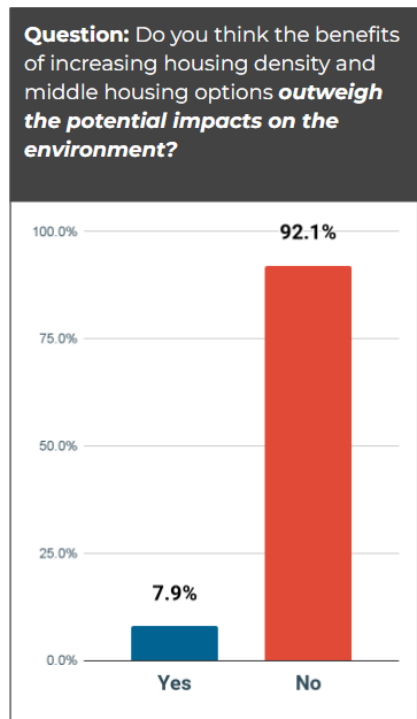
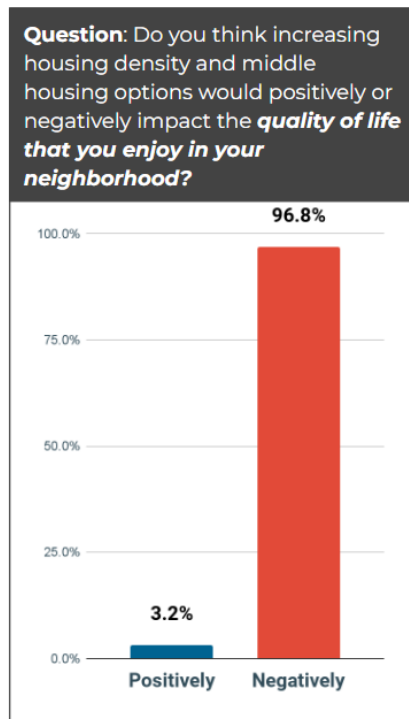
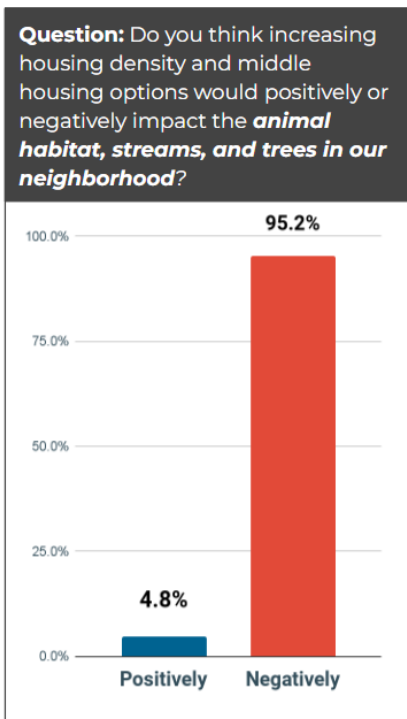
Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

My name is John Wu, a long time resident of Wilburton neighborhood. Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS.

Neighborhood subareas next to major transit systems differ in character, density, landscape, and environment. A one-size-fits-all solution does not take into account the needs and characteristics of the affected areas and the impact it will have on residents' well-being, quality of life, and the natural environment. An approach tailored to meet our community's needs may improve the quality of life for all its residents.

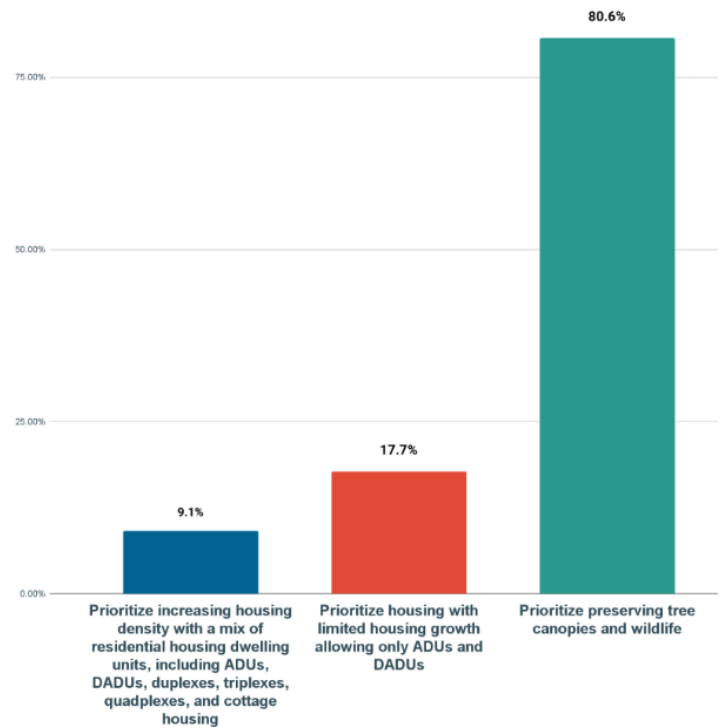
Here are key priorities that our Wilburton neighborhood considers significant and important:

- Prioritize the preservation of Wilburton's environmental ecosystem as they are essential for the health and integrity of Wilburton's critical areas. A survey was undertaken, reaching out to every Wilburton accessible Wilburton home on our single-family residential streets nearest to Bel-Red. The survey results below show that the majority of residents prioritize the preservation of their neighborhood environment over housing density.



Question:

If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**



- Inform and ask Neighborhood Associations to reach out to their residents in an impartial, unbiased manner for input and feedback. Stress the need for an engagement process that allows ideas and avoids predetermined outcomes. This will ensure a transparent and inclusive process.
- Prioritize neighborhood residents who have vested interests in their community and are directly impacted. Bellevue residents encompass a rich diversity and a spirit of inclusivity and should be adequately represented.
- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the surrounding homes.
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
- Residential homes in critical areas need special considerations. The cumulative effects on critical areas need measured mitigation. The Wilburton neighborhood nearest to the Bel-Red development, for example, is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation of mature tree canopies are essential for the ecosystem in critical areas.
- Wilburton is one of the few critical areas remaining in the USA in a city with a similar population. Cumulative mitigations have not been established. Critical area residential zoning density should be maintained.

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
2. Consider that on average, individuals are likely to transition to different jobs, each in a different location approximately six times throughout their lifetime.
3. Employers are increasingly embracing remote work options and reducing their reliance on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider that reversing the environmental impact caused by such growth is unlikely to occur.
4. Alternative 3 does not ensure the job market and economic needs are met for different income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness secondary to drug use, susceptible to drug related crimes, and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued to live without jobs and homelessness.
5. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers using US Forest Service Inventory data show that increasing temperatures are causing growth declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere and mitigate the carbon dioxide by 25% while also removing air pollution, naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon fighting against rising temperatures. *(3) Alternative 3 will cause the greatest effect on changing temperatures in residential areas. Consider a tree code.
6. Preservation of mature trees are essential for cooling stream temperatures for all aquatic and land wildlife and are part of their sensitive ecosystem.
7. Prioritize science and data. Oppose a recommended over development one size fits all approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and minimum setbacks. These are not reasonable principles and certainly not based on science and data. A one size fits all approach is not considering neighborhoods with diverse types of land.
8. Ensure housing typologies and pace of growth within neighborhoods are properly aligned. Consider developing housing options that complement the scale and character of the different neighborhoods.

"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."

I also support the following the inception of **Land Use Policies** that aligned with the Wilburton/NE 8th Subarea Plan:

"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.

and the previous policies protecting and preserving Wilburton's natural determinants, Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays an essential role that provides residents with a profound sense of well-being.

Wilburton Natural Determinants Policies:

"Policies

POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.

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POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."

Photos of the Critical Areas

Below are a few photos of wildlife in our cul-de-sac and photos of some of our critical areas in neighboring streets:



Red-tailed Hawk on neighbor's roof in Wilburton.



Another Hawk on a neighbor's Tree.



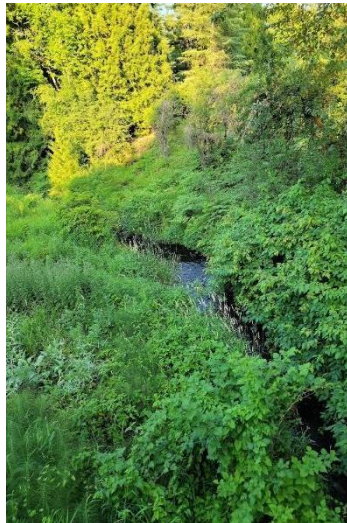
A Great Blue Heron, a Priority Species.



A Bobcat on my neighbor's Fence



A Bald Eagle flying over my neighbor's roof.



The Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.



Kelsey Creek in our neighbor's yard was unusually dirty last week.

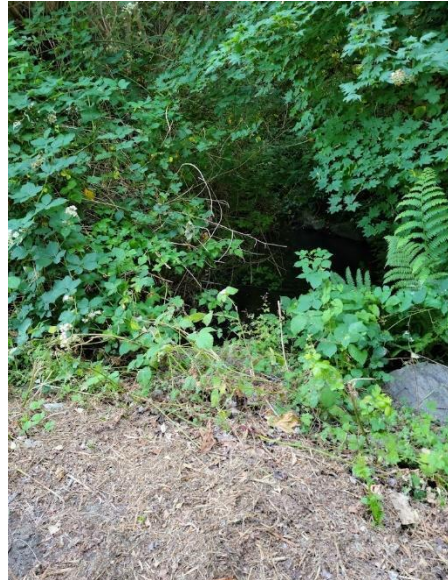


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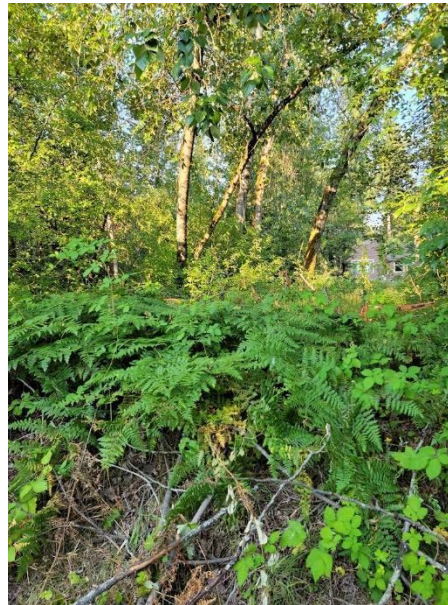
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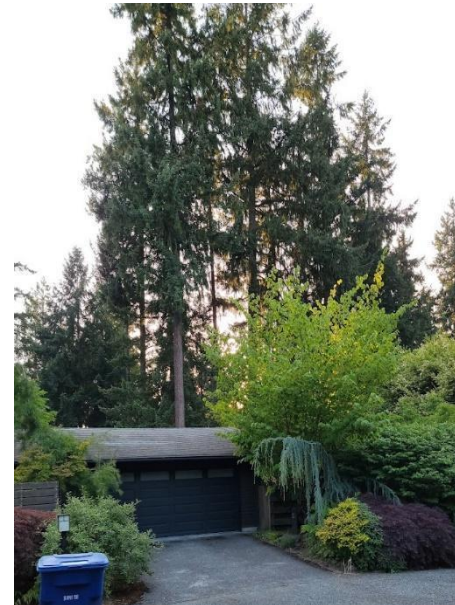
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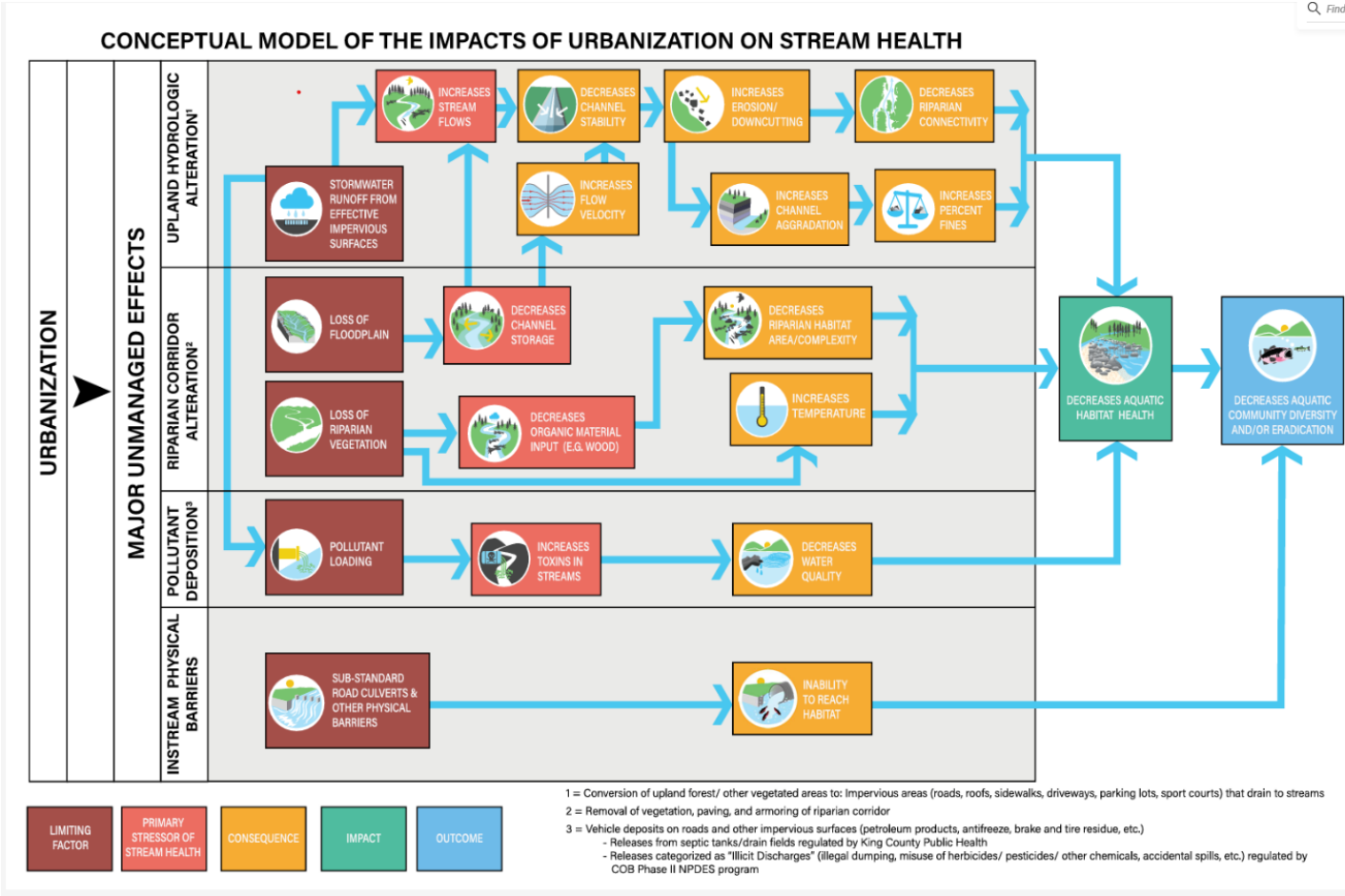
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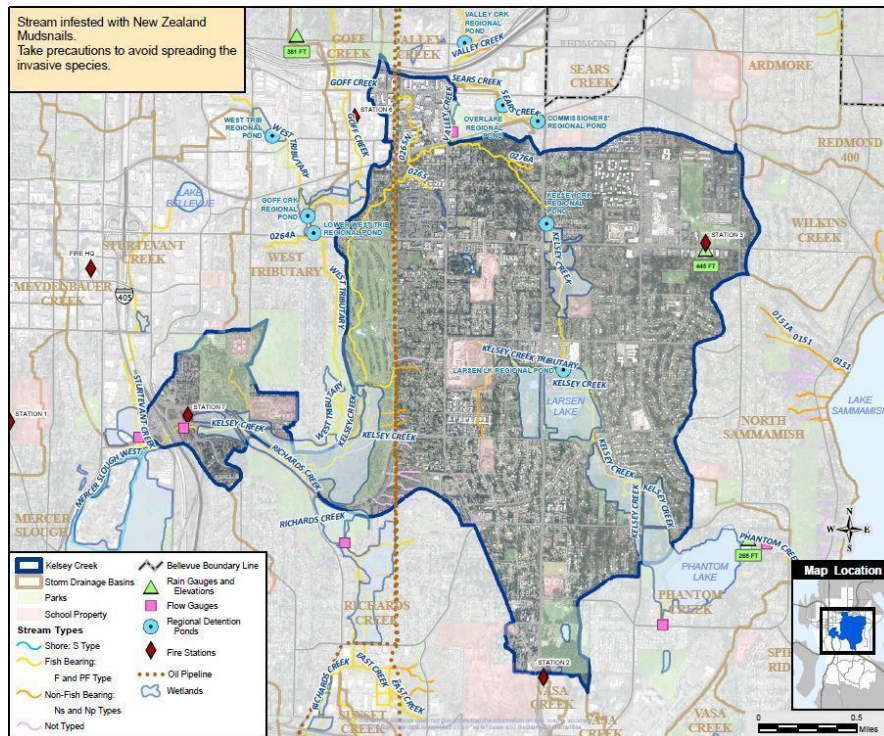
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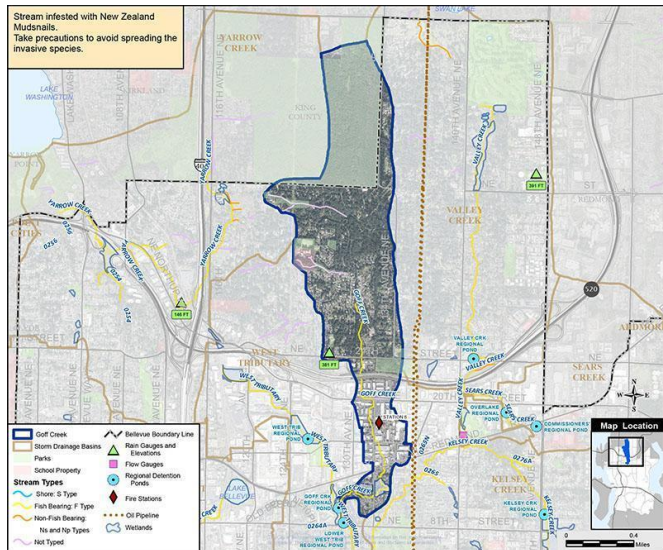
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**GOFF Creek – (City of Bellevue) *(2)
Salmon Present in the Basin**

- **Chinook*+**
- **Coho+**
- **Sockeye**
- **Rainbow & Cutthroat Trout**

*** Listed Federal Endangered Species**

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SAMPLE LETTER

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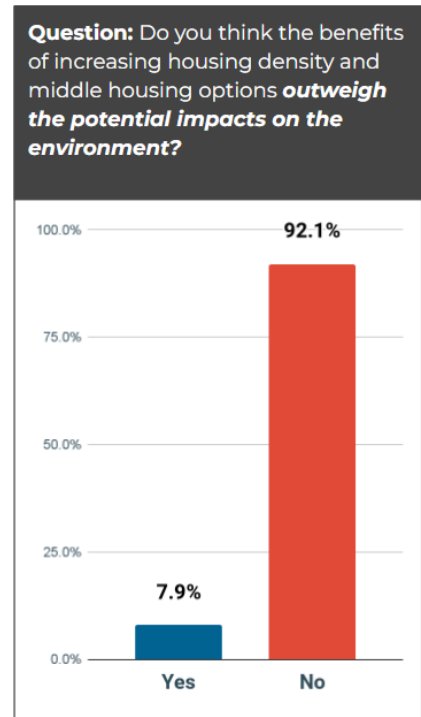
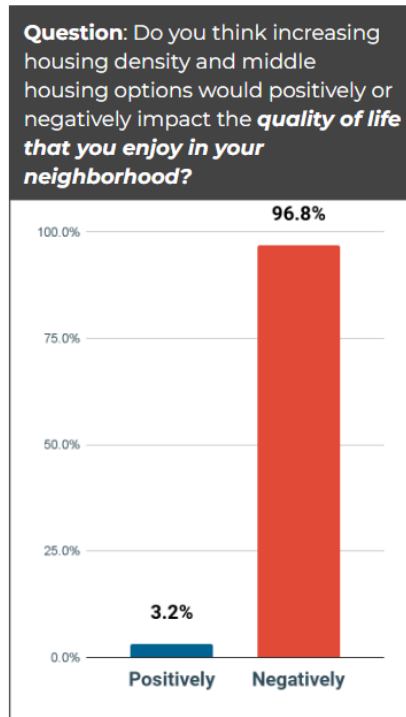
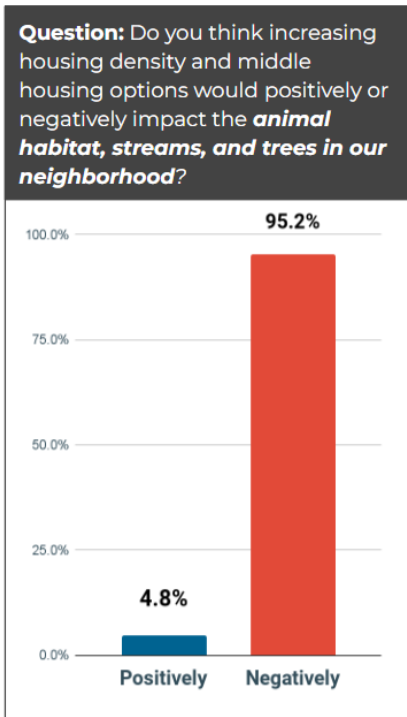
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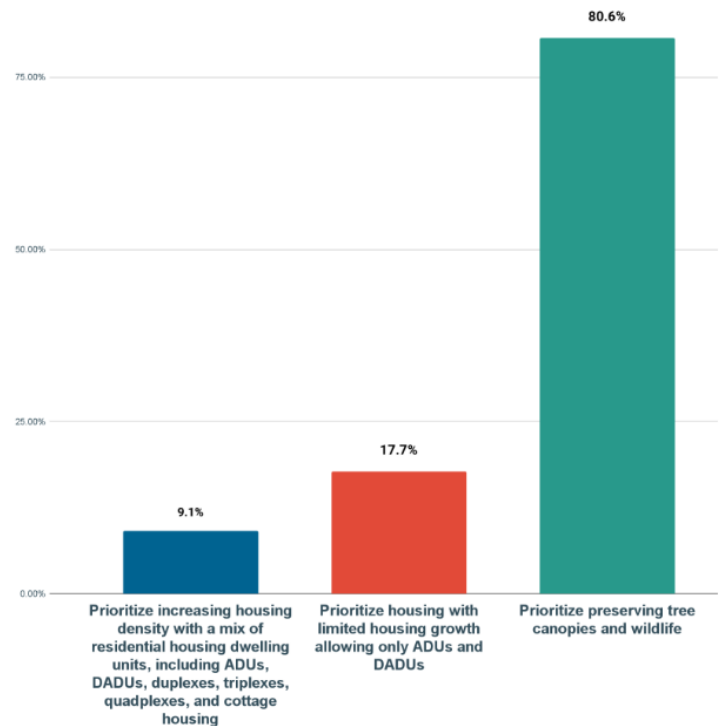
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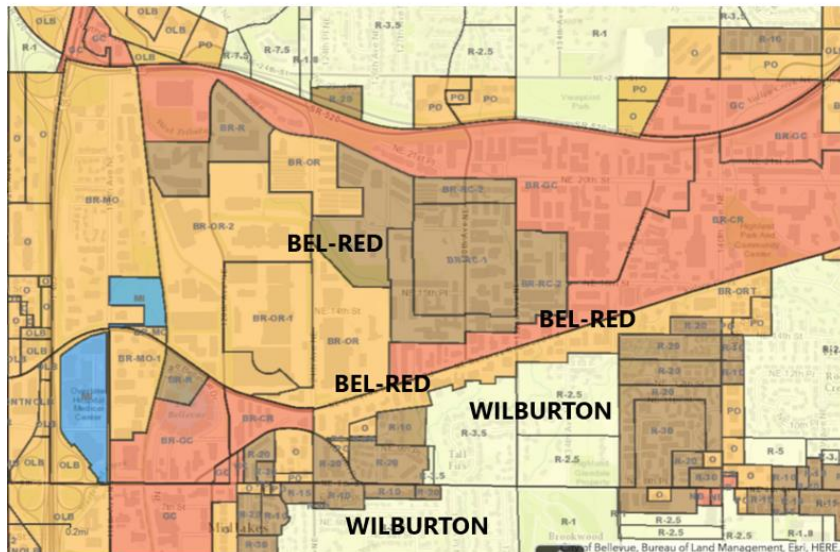
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Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
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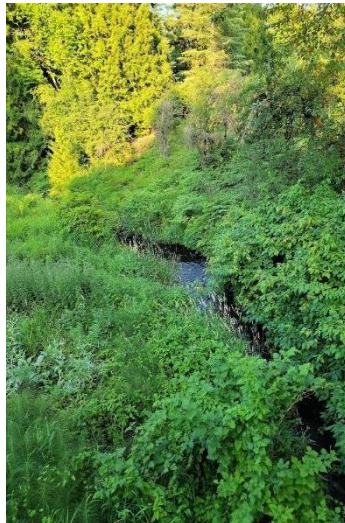
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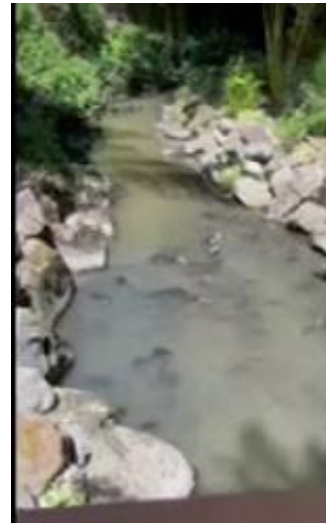
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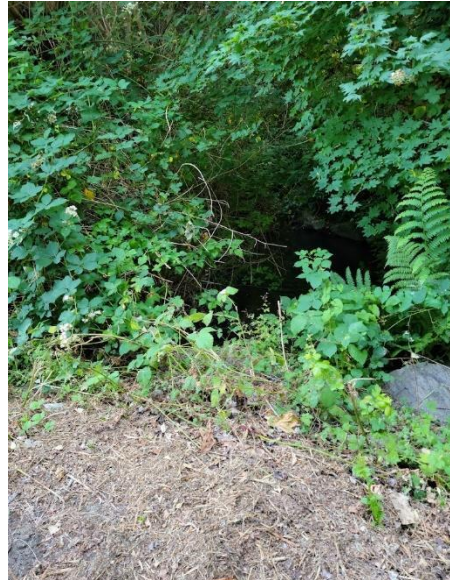


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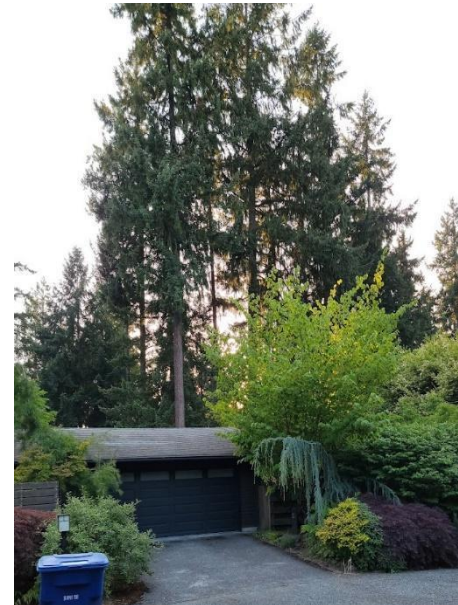
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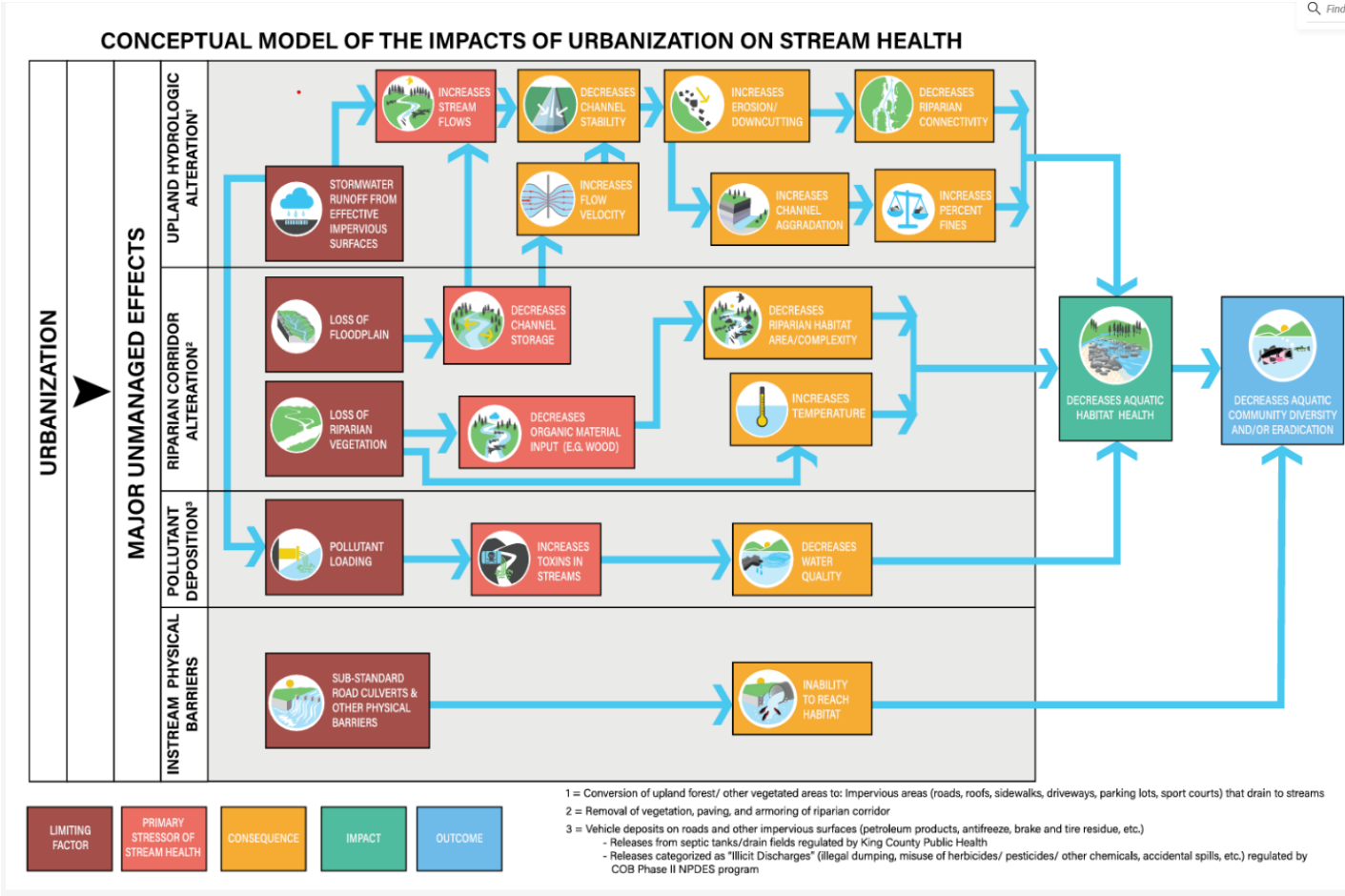
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Kelsey Creek Watershed is approximately 90 percent private property and 10 percent publicly owned (primarily parks)..."

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1. **Pollutant Loading:** Stormwater runoff from impervious surfaces includes road runoff, pollutants, contribute to the worsening habitat water quality for fish and wildlife.
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The Shoreline Management Act adds goals and policies as set forth under RCW 90.58.020 with equal order of priority goals under 36.70A.020.

Wilburton has the **Kelsey Creek Watershed System**, which includes **Goff Stream**, and is subject to Bellevue City Code Part 20.25H Critical Areas Overlay District. (1) :

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Streams and Riparian Areas

([LUC 20.25H.075](#)) Streams are classified into four types, based on their flow and capacity to support fish. Artificial channels (e.g., ditches) are generally not protected, unless they are used by salmonids or convey a stream that previously occurred naturally in that location.

A healthy stream needs healthy riparian areas along its banks and floodplain. Riparian vegetation provides shade, which protects water quality; retains soil, which prevents erosion that can affect salmon spawning and feeding areas; holds back flood flows; and provides wildlife habitat and the large woody debris that stores sediments, slows flood velocities, and creates good fish habitat.

Wetlands

([LUC 20.25H.095](#)) Wetlands include the vegetated edges of ponds and areas commonly called swamps, marshes, and bogs. Frequently, their water is only visible in the spring. Wetlands are classified into four categories, based on a combination of habitat, water quality, and flood-flow-reduction functions.

Wetlands provide rearing and foraging habitats for fish and wildlife and food chain support for downstream waters. Wetlands provide natural water quality improvement; flood-flow reduction and storage; shoreline erosion protection; and opportunities for passive recreation. Many urban wetlands are heavily disturbed, but still provide valuable water quality treatment and flood-flow reduction.

Habitats for Species of Local Importance

([LUC 20.25H.150](#)) Species of local importance are specifically recognized local populations of native species that are at risk of being lost from Bellevue—western pond turtle, Oregon spotted frog, western toad, Chinook salmon, bull trout, coho salmon, river lamprey, bald eagle, peregrine falcon, common loon, pileated woodpecker, Vaux's swift, merlin, western grebe, great blue heron, osprey, green heron, red-tailed hawk, western big-eared bat, Keen's myotis (bat), long-legged myotis (bat), and long-eared myotis (bat)—and whose presence can be an indicator of environmental health.

Habitats for these species provide the food, water, nesting/rearing, and cover necessary to support their populations. Protected habitats include naturally occurring ponds under 20 acres, concentrations of dead trees, caves and roosting structures, and large stands of conifers.

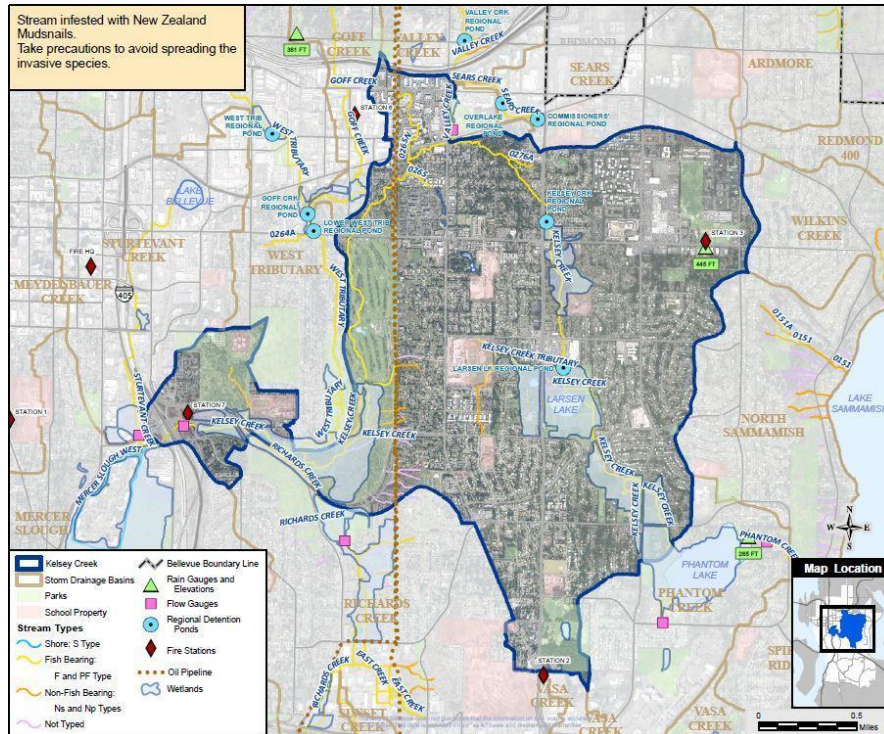
Geological Hazard Areas

([LUC 20.25H.120](#)) Geological hazard areas—landslide hazard areas, steep slopes, and coal mine hazard areas—are areas susceptible to erosion, sliding, earthquake, or other geological events. Because of their conditions, these areas pose a threat to health and safety when development is sited too close.

Geological hazard areas are regulated mainly for these safety reasons but also for their habitat values. Several of Bellevue's large blocks of forest are on steep slopes, providing wildlife habitat and important movement corridors. Steep slopes can also be conduits for groundwater draining from hillsides to form the headwaters of wetlands and streams.

Flood Hazard Areas

(LUC 20.25H.175) Flood hazard areas are those subject to 100-year floods (identified on FEMA Flood Insurance Rate Maps). These areas are designated to protect development from flooding and to protect the inherent functions of floodplains. Undeveloped floodplains store water and slow the downstream delivery of flood flows, reducing the impacts of a flood and recharging wetlands, streams and underground aquifers. Floodplain development reduces the floodplain's water storage capacity and puts valued property and infrastructure in the path of floodwaters. Runoff from impervious surfaces changes flood size and frequency and can degrade water quality.”



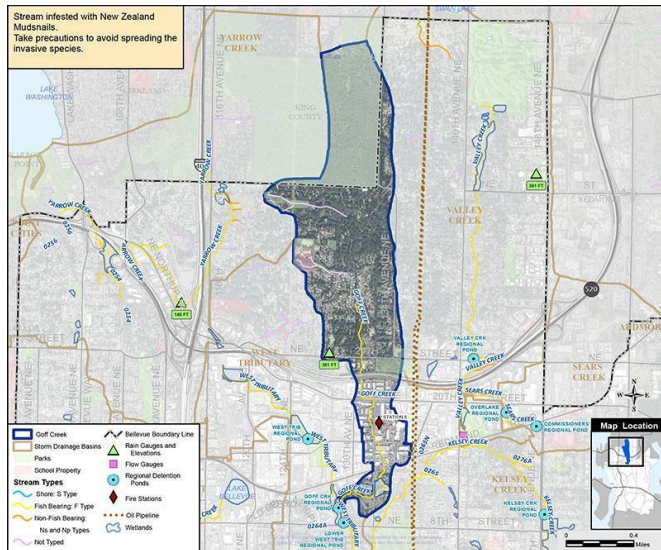
Kelsey Creek Drainage Details (City of Bellevue) *(2)

Salmon Present in the Basin

- Chinook*+
- Coho+
- Sockeye
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* Listed Federal Endangered Species

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**GOFF Creek – (City of Bellevue) *(2)
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Our Wilburton subarea is expected to grow. We sincerely hope that measures will be taken to ensure the growth is accompanied by safeguards that prioritize the safety of our neighborhood and preserve the unique environment that makes Wilburton so special. Being one of the few areas with tree canopies in a city of this size in the entire USA, the preservation of our environment was a primary factor in our decision to live here. I appreciate the opportunity to work with our city to provide housing and an inclusive community.

Sincerely,

Jiang Wu and his family
12814 NE 4th PL, Bellevue, WA

- (1) City of Bellevue Watershed Management Plan
- (2) <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
- (3) [Climate change: Trees 'most effective solution' for warming - BBC News](#)

Please include me as a party of record.

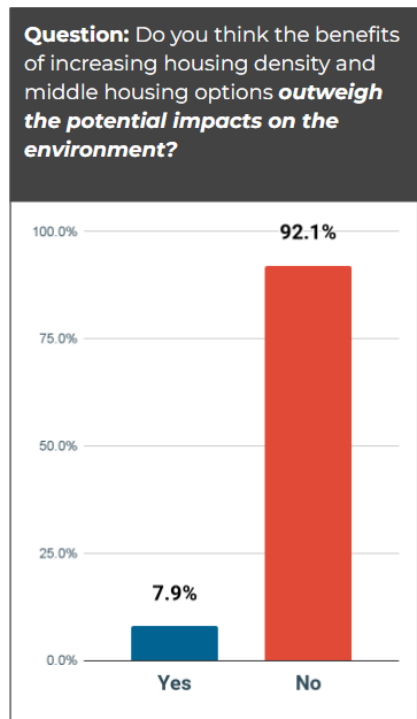
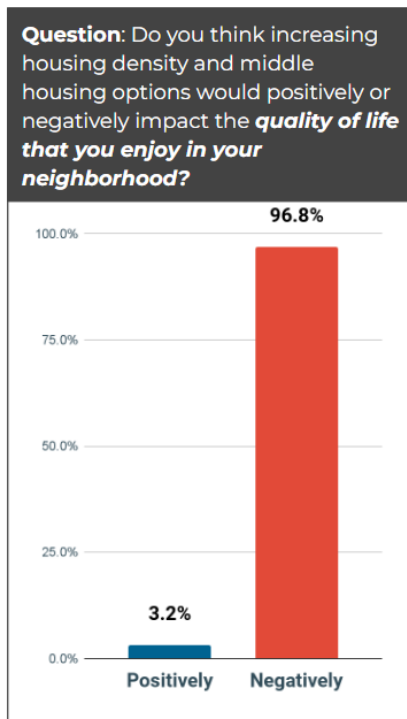
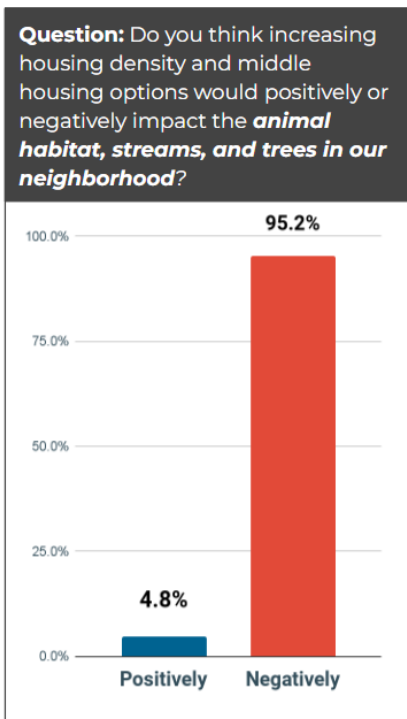
Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

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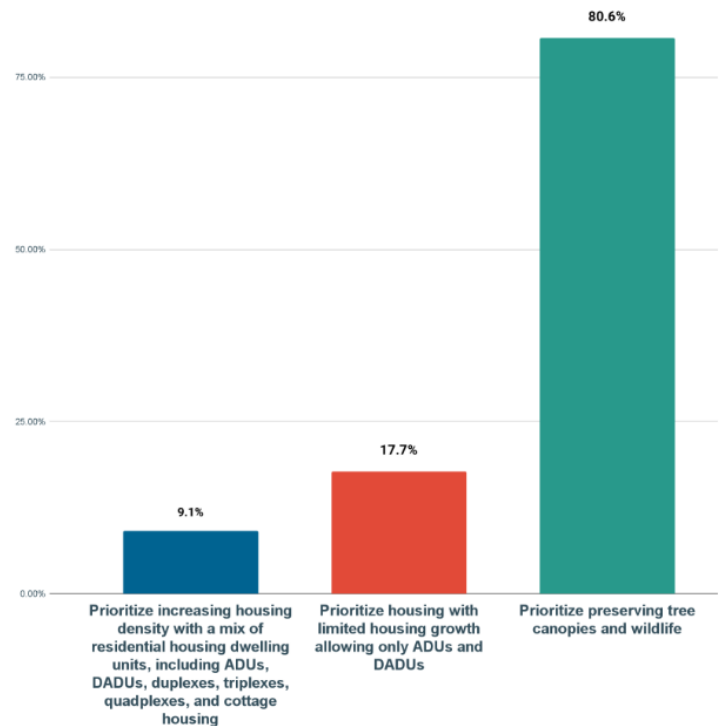
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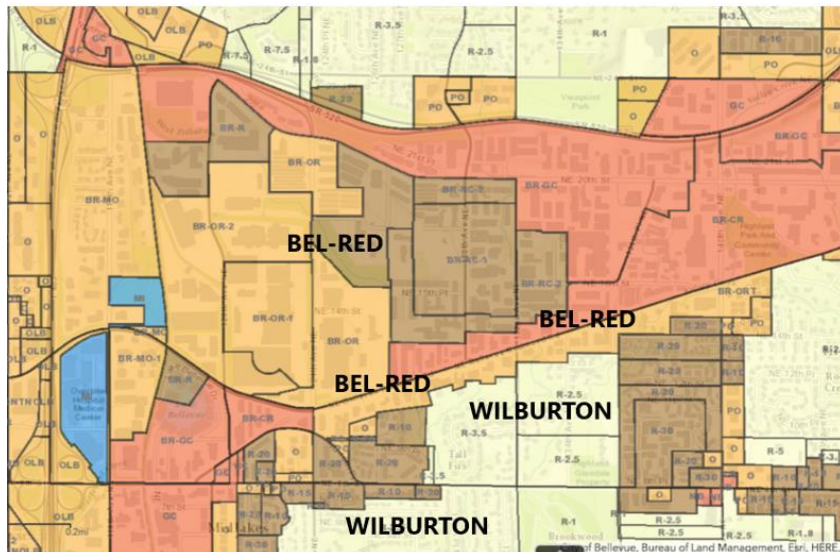
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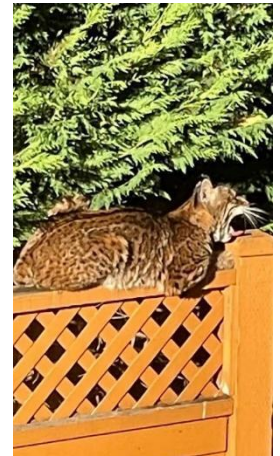
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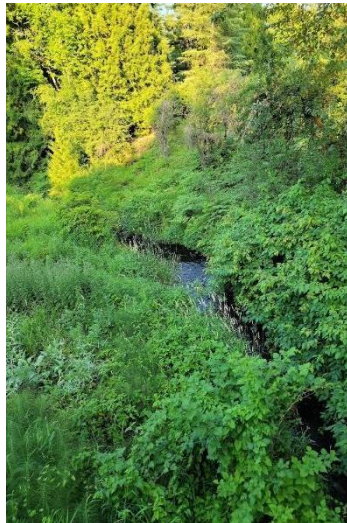
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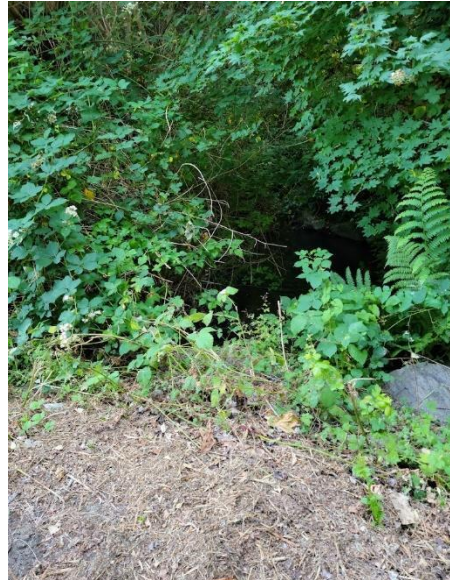


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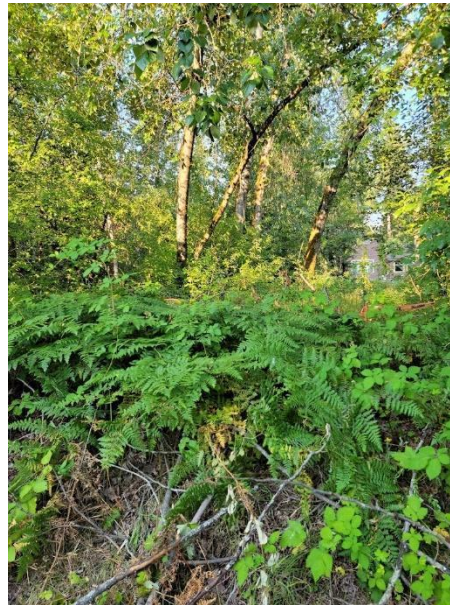
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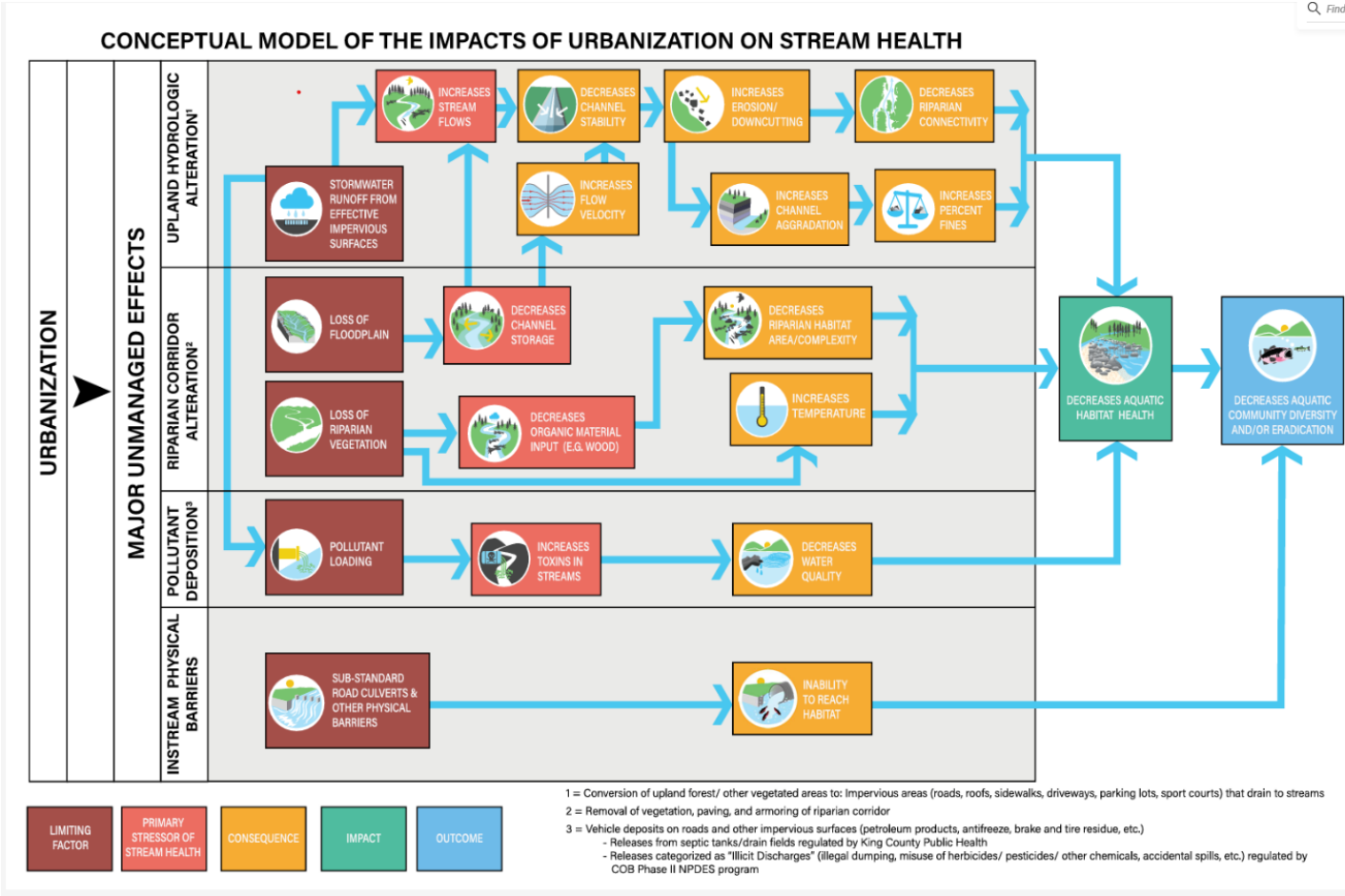
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Streams and Riparian Areas

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A healthy stream needs healthy riparian areas along its banks and floodplain. Riparian vegetation provides shade, which protects water quality; retains soil, which prevents erosion that can affect salmon spawning and feeding areas; holds back flood flows; and provides wildlife habitat and the large woody debris that stores sediments, slows flood velocities, and creates good fish habitat.

Wetlands

([LUC 20.25H.095](#)) Wetlands include the vegetated edges of ponds and areas commonly called swamps, marshes, and bogs. Frequently, their water is only visible in the spring. Wetlands are classified into four categories, based on a combination of habitat, water quality, and flood-flow-reduction functions.

Wetlands provide rearing and foraging habitats for fish and wildlife and food chain support for downstream waters. Wetlands provide natural water quality improvement; flood-flow reduction and storage; shoreline erosion protection; and opportunities for passive recreation. Many urban wetlands are heavily disturbed, but still provide valuable water quality treatment and flood-flow reduction.

Habitats for Species of Local Importance

([LUC 20.25H.150](#)) Species of local importance are specifically recognized local populations of native species that are at risk of being lost from Bellevue—western pond turtle, Oregon spotted frog, western toad, Chinook salmon, bull trout, coho salmon, river lamprey, bald eagle, peregrine falcon, common loon, pileated woodpecker, Vaux's swift, merlin, western grebe, great blue heron, osprey, green heron, red-tailed hawk, western big-eared bat, Keen's myotis (bat), long-legged myotis (bat), and long-eared myotis (bat)—and whose presence can be an indicator of environmental health.

Habitats for these species provide the food, water, nesting/rearing, and cover necessary to support their populations. Protected habitats include naturally occurring ponds under 20 acres, concentrations of dead trees, caves and roosting structures, and large stands of conifers.

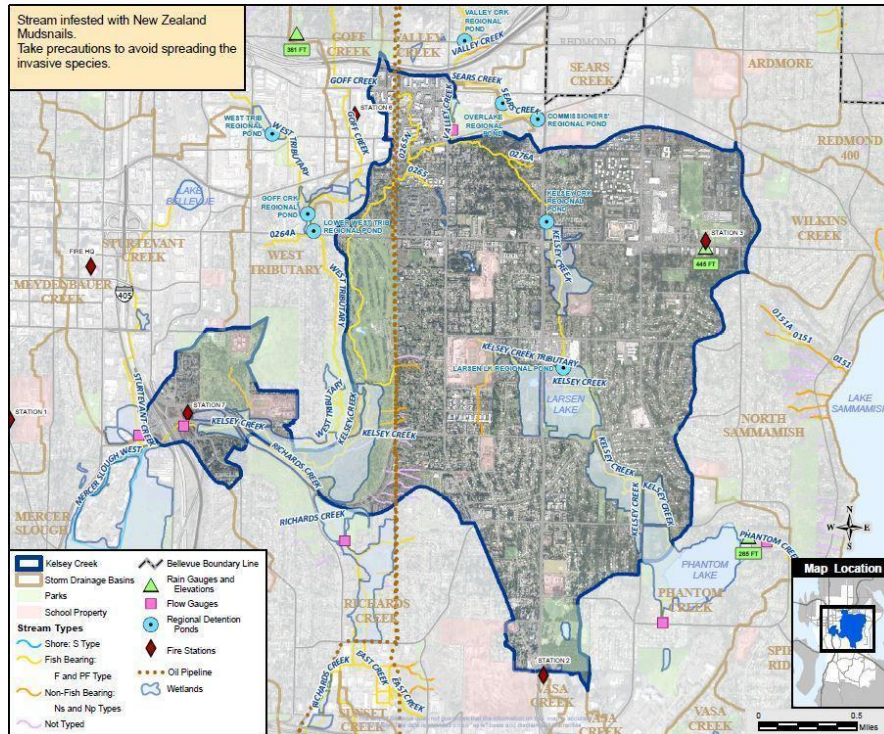
Geological Hazard Areas

([LUC 20.25H.120](#)) Geological hazard areas—landslide hazard areas, steep slopes, and coal mine hazard areas—are areas susceptible to erosion, sliding, earthquake, or other geological events. Because of their conditions, these areas pose a threat to health and safety when development is sited too close.

Geological hazard areas are regulated mainly for these safety reasons but also for their habitat values. Several of Bellevue's large blocks of forest are on steep slopes, providing wildlife habitat and important movement corridors. Steep slopes can also be conduits for groundwater draining from hillsides to form the headwaters of wetlands and streams.

Flood Hazard Areas

(LUC 20.25H.175) Flood hazard areas are those subject to 100-year floods (identified on FEMA Flood Insurance Rate Maps). These areas are designated to protect development from flooding and to protect the inherent functions of floodplains. Undeveloped floodplains store water and slow the downstream delivery of flood flows, reducing the impacts of a flood and recharging wetlands, streams and underground aquifers. Floodplain development reduces the floodplain's water storage capacity and puts valued property and infrastructure in the path of floodwaters. Runoff from impervious surfaces changes flood size and frequency and can degrade water quality.”



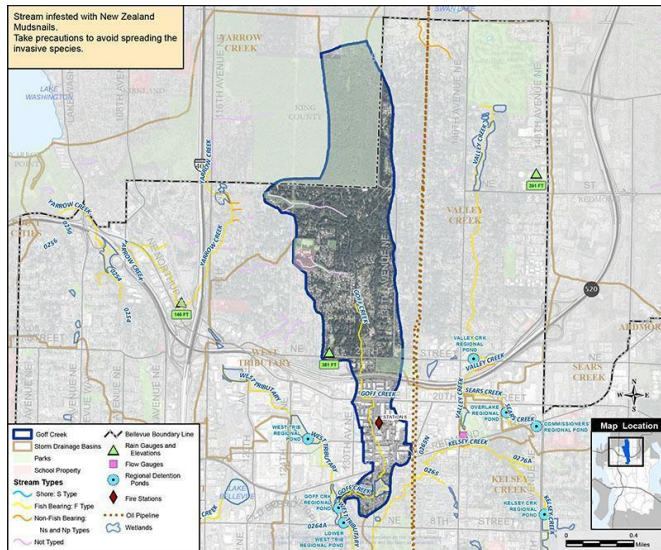
Kelsey Creek Drainage Details (City of Bellevue) *(2)

Salmon Present in the Basin

- Chinook*+
- Coho+
- Sockeye
- Cutthroat Trout

* Listed Federal Endangered Species

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)



**GOFF Creek – (City of Bellevue) *(2)
Salmon Present in the Basin**

- **Chinook*+**
- **Coho+**
- **Sockeye**
- **Rainbow & Cutthroat Trout**

*** Listed Federal Endangered Species**

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)

Our Wilburton subarea is expected to grow. We sincerely hope that measures will be taken to ensure the growth is accompanied by safeguards that prioritize the safety of our neighborhood and preserve the unique environment that makes Wilburton so special. Being one of the few areas with tree canopies in a city of this size in the entire USA, the preservation of our environment was a primary factor in our decision to live here. I appreciate the opportunity to work with our city to provide housing and an inclusive community.

Sincerely,

Mei Wu

- (1) City of Bellevue Watershed Management Plan
- (2) <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
- (3) [Climate change: Trees 'most effective solution' for warming - BBC News](#)

Gulledge, Kristin

From: phyllisjwhite@comcast.net
Sent: Wednesday, July 12, 2023 5:34 PM
To: PlanningCommission
Subject: Oral Communications for today

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

sachin lande is signing up to speak today. his address is 811 132nd ave ne bellevue wa 98005. He will be speaking on Wilburton vision Implementation and the Wilburton Comp Plan

Johnson, Thara

From: Orry Soegiono <bonometric@gmail.com>
Sent: Monday, July 10, 2023 9:35 PM
To: PlanningCommission
Subject: Public comment on City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please include me as a party of record.

Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

My name is Orry Soegiono. Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS.

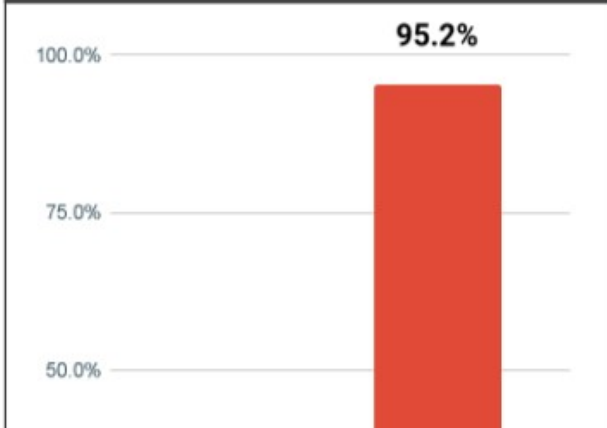
Neighborhood subareas next to major transit systems differ in character, density, landscape, and environment. A one-size-fits-all solution does not take into account the needs and characteristics of the affected areas and the impact it will have on residents' well-being, quality of life, and the natural environment. An approach tailored to meet our community's needs may improve the quality of life for all its residents. Some neighborhoods, for example, near major transit systems will not experience the growth of additional 5,000 housing units and additional business office and retail office spaces on two sides, with each side expecting at least 5,000 housing units on the perimeters of their neighborhood, a total of at least 10,000 housing units. This is about 29% of the 35,000 housing unit expected growth.

Here are key priorities that our Wilburton neighborhood considers significant and important:

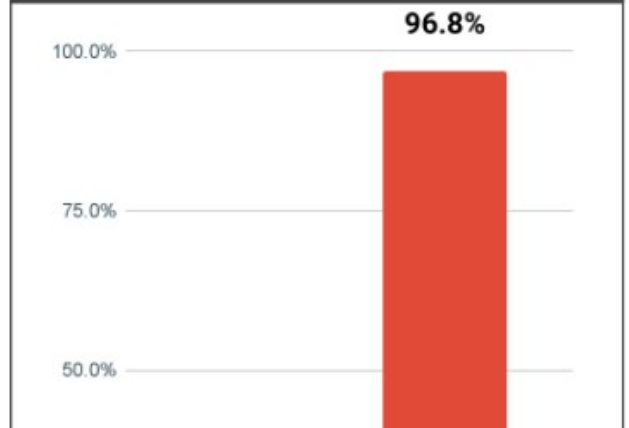
-
-
- Prioritize the preservation of Wilburton's environmental ecosystem as they are essential
- for the health and integrity of Wilburton's critical areas. A survey was undertaken, reaching out to every Wilburton accessible Wilburton home on our single-family residential streets nearest to Bel-Red. The survey results below show that the majority of
- residents prioritize the preservation of their neighborhood environment over housing density. Additionally, they expressed their desire for elected City leaders to take action on their behalf to reflect their expectation in the

process.

Question: Do you think increasing housing density and middle housing options would positively or negatively impact the *animal habitat, streams, and trees in our neighborhood?*



Question: Do you think increasing housing density and middle housing options would positively or negatively impact the *quality of life that you enjoy in your neighborhood?*



•

Question:
If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend**



•

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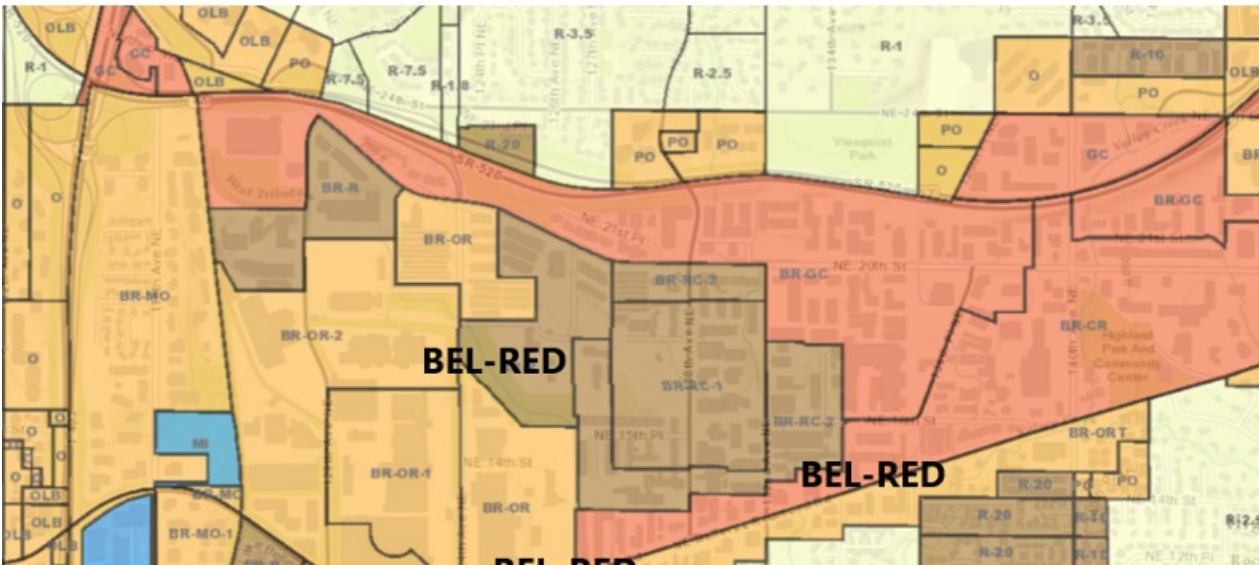
- Proactively ask Neighborhood Associations to reach out to their residents in an impartial,
- unbiased manner. Stress the need for an engagement process that allows ideas and avoids predetermined outcomes. This will ensure a variety a transparent and inclusive process that truly considers the input and feedback received from residents.
-
-
-
- Prioritize neighborhood residents who are directly impacted. Long term residents have vested interests in their community. They often volunteer for the city, support and volunteer in schools, support their city departments, support local businesses, and care about their neighborhoods. Bellevue residents encompass a rich diversity and a spirit
- of inclusivity and should be adequately represented. Some non-resident groups who are not directly vested in our city are listed below:
-
-
-
- Collectively, many activist groups comprise thousands of active members throughout the state, actively engaging in affordable housing initiatives at both the state and local legislative levels. However, many who share similar environmental interests, for example, do not know that implementing these legislative policies without
- special considerations may result in damaging effects with harmful and undesirable outcomes.
-
-
-
- Profit-making real estate companies and developers, may not share similar
- interests and goals of neighborhood residents and may not also provide assimilating affordable housing.
-
-
-
- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the character and context of the surrounding homes.
-
-
-
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
-
-
-
- Homes in critical areas need special considerations and ongoing attention, and extensive building and permitting requirements. The Wilburton neighborhood nearest to the Bel-Red development is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation
- of mature tree canopies are essential for the ecosystem in critical areas.
-

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

- 1.
- 2.
3. Alternative 2 OR a different alternative will provide for more flexibility with a changing
4. economy and job market.
- 5.
- 6.
- 7.
8. Consider that on average, individuals are likely to transition to different jobs, each
9. in a different location approximately six times throughout their lifetime.
- 10.
- 11.
- 12.
13. People tend to have increasing wages as they gain experience and knowledge. Many people
14. marry and have 2 incomes. With growing incomes, people are more likely to afford to buy a home later
15. in their lives.
- 16.
- 17.
18. Employers are increasingly embracing remote work options and reducing their reliance
19. on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider
20. that reversing the environmental impact caused by such growth is unlikely to occur.
- 21.
- 22.
23. Alternative 3 does not ensure the job market and economic needs are met for different
24. income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high
25. risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness
26. secondary to drug use, susceptible to drug related crimes,
27. and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and
28. well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued
29. to live without jobs and homelessness.
- 30.
- 31.
- 32.
- 33.
- 34.
35. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers
36. using US Forest Service Inventory data show that increasing temperatures are causing growth
37. declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere
38. and mitigate the carbon dioxide by 25% while also removing air pollution,
39. naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon
40. fighting against rising temperatures. *(3) Alternative 3 will cause the greatest effect on changing
41. temperatures in residential areas. Consider a tree code.
- 42.
- 43.
- 44.
45. Similarly tree codes are needed in the critical areas where mature trees are essential
46. for cooling stream temperatures and for the survival of wildlife and their sensitive ecosystem.
- 47.
- 48.
- 49.
- 50.
51. Prioritize science and data. Oppose a recommended over development one size fits all
52. approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and
53. minimum setbacks. These are not reasonable principles and certainly not based on science and
54. data. A one size fits all approach is not considering neighborhoods with
55. diverse types of land.

- 43.
- 44.
- 45.
- 46. It is essential to ensure that the housing typologies and pace of growth within neighborhoods
- 47. are properly aligned. This entails developing housing options that complement the scale and character of the different neighborhoods.
- 48.

THE BELRED DEVELOPMENT AND ONE AREA OF WILBURTON



The 900-acre BelRed development is less than a block away from Wilburton.

-
-
- **By 2030, the BelRed 900-acre development is expected to generate 10,000 new jobs.**
-
-
- **By 2030 the BelRed development is expected to generate 5,000 housing units.**
-
-
- **2,514 housing units are being reviewed for construction as of December 2022.**
-
-
-
- **6,433 parking spaces are currently**
- **being reviewed for the BelRed housing and business development**
- **– (This**

- will cause significant traffic, noise, and air pollution.)

-

The Wilburton Vision Implementation will include another growth development with another 5,000 plus additional housing units on NE 116th.

As a result, I support the inception and reinstatement of the following Wilburton/NE 8th Subarea Plan Goals:

"Wilburton/NE 8th Subarea Plan Goals

• **To separate residential, recreational, and open space areas from commercial areas and to protect space.**

• **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**

To support the provision of commercial services in Wilburton that complement Downtown..."

and:

"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."

I also support the following the inception of **Land Use Policies** that aligned with the Wilburton/NE 8th Subarea Plan:

"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.

and the previous policies protecting and preserving Wilburton's natural determinants, Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays an essential role that provides residents with a profound sense of well-being.

Wilburton Natural Determinants Policies:

"Policies

POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.

POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.

POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."

Photos of the Critical Areas

Below are a few photos of wildlife in our cul-de-sac and photos of some of our critical areas in neighboring streets:



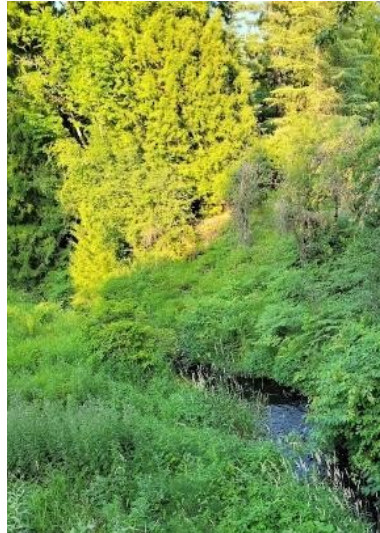
Red-tailed Hawk on neighbor's roof in Wilburton.



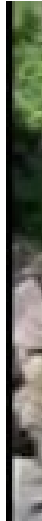
Another Hawk on a neighbor's Tree.



A Bald Eagle flying over my neighbor's roof.



The Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.



Ke
dir

This is a critical area with many mature tree canopies. This area is being designated for R-Suburban, with significant benefits would benefit remaining as low density housing (BCC 20.25H). Removing tree canopies negatively impact the Wilburton's wildlife. The sensitive ecosystem cannot be recovered with mitigation.



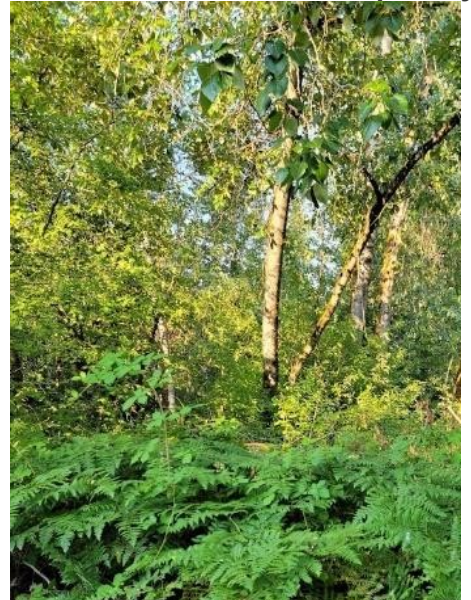
Tall Firs in Wilburton across of Bel-Red. Homes are surrounded by trees.



Goff Creek on 132nd where priority Cutthro



Dense tree canopies in the Wilburton area that cools water and air temperatures.



Wilburton home surrounded by marsh.

“The land cover in the Greater Kelsey Creek Watershed is typical of urban watersheds with a lower percentage of tree canopy and higher percentage of impervious surface ...Within Bellevue, ownership of the riparian corridor across all of the subbasins within the Greater Kelsey Creek Watershed is approximately 90 percent private property and 10 percent publicly owned (primarily parks)...”

Factors Affecting the Health of the Greater Kelsey Creek Watershed (1)

1.

2.

3. Pollutant Loading:

4. Stormwater runoff from impervious surfaces includes road runoff, pollutants, contribute to the worsening habitat water quality for fish and wildlife.

5.

6.

7.

8. Stormwater Runoff from Effective Impervious Surfaces:

9. The City's flow control for new development has shown not to

10. be effective at protecting streams from erosion.

11.

12.

13.

14. Road Culverts and Other Physical Barriers:

15. A number of physical barriers including undocumented barriers on private properties preventing fish passage for spawning and/or rearing have been identified in all the streams of the Greater Kelsey Creek Watershed.

16.

17.

18.

19. Loss of Floodplain and Riparian Function:

20. Urban development has confined and reduced the natural occurrence of wood entering many of the stream reaches in the Watershed. Tree canopies are becoming largely concentrated in parks reducing floodplain storage. This is leading to high velocities and flowrates.

21. The City has invested tens of millions of dollars in the Greater Kelsey Creek Watershed over the past 15 years on in-stream projects that include repairing stormwater outfalls, stabilizing stream slopes, removing fish passage barriers, catching and removing

22. fine sediment, and improving conveyance.

23.

Wetlands provide rearing and foraging habitats for fish and wildlife and food chain support for downstream waters. Wetlands provide natural water quality improvement; flood-flow reduction and storage; shoreline erosion protection; and opportunities for passive recreation. Many urban wetlands are heavily disturbed, but still provide valuable water quality treatment and flood-flow reduction.

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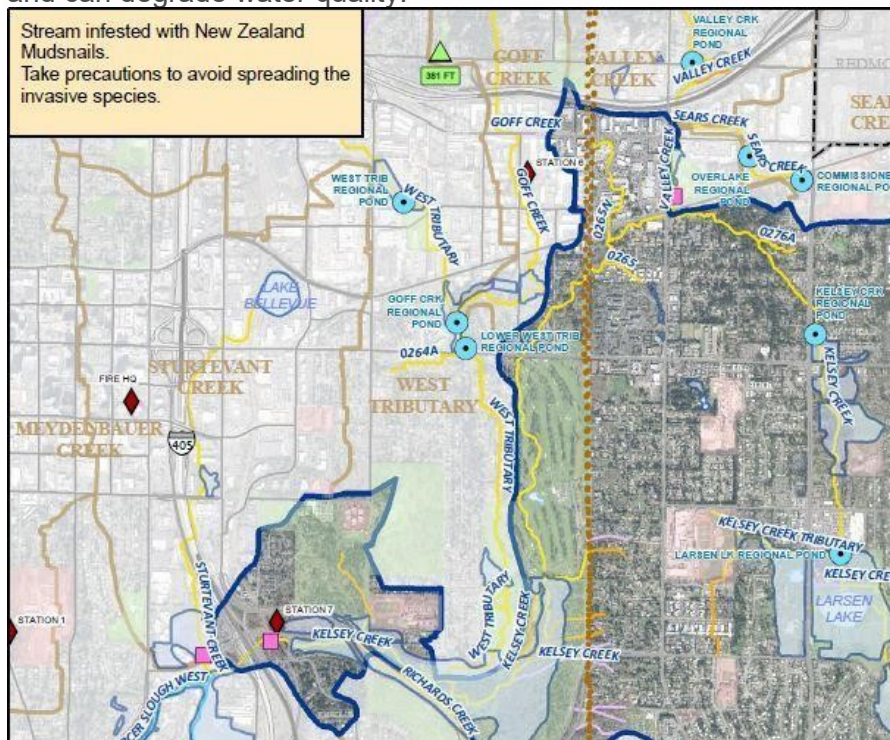
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Flood Hazard Areas

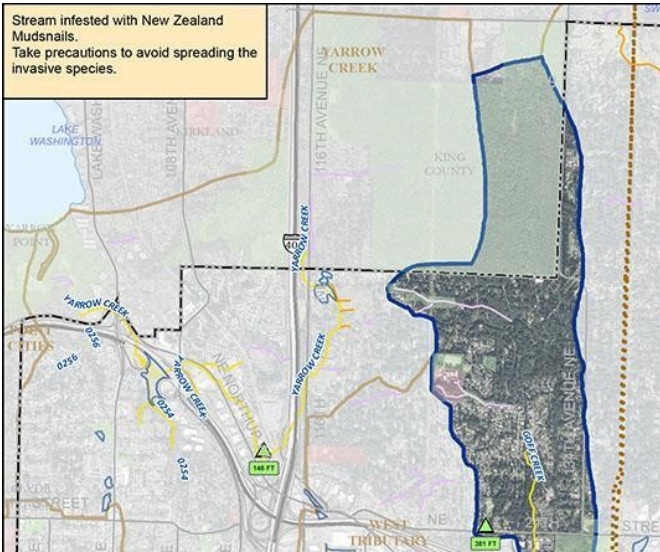
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**Kelsey Creek Drainage Details (City of Bellevue) *(2)
Salmon Present in the Basin**

-
- **Chinook****
-
-
-
- **Coho+**
-
-
-
- **Sockeye**
-
-
-
- **Cutthroat Trout**
-

*** Listed Federal Endangered Species**
+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)



Goff Creek – (City of Bellevue) *(2)
Salmon Present in the Basin

-
-
- **Chinook****
-
-
-
- **Coho+**
-
-
-
- **Sockeye**
-
-
- **Rainbow & Cutthroat Trout**
-

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Sincerely,



Orry Soegiono

12862 NE 10th PL
Bellevue WA 98005

- 1.
- 2.
3. City of Bellevue Watershed Management Plan
- 4.
- 5.
- 6.
7. <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
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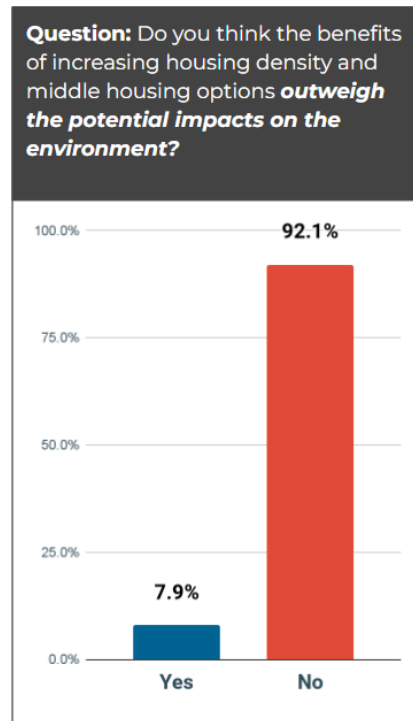
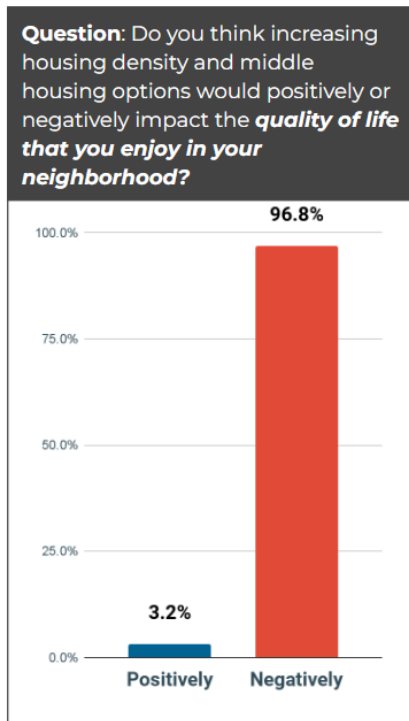
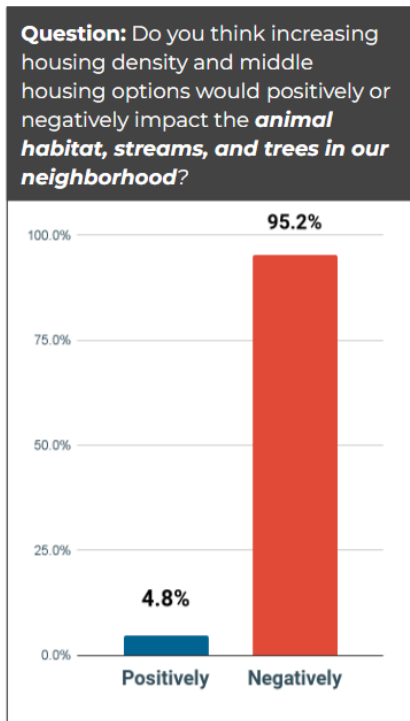
Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. My name is Phyllis White and I am a Bellevue resident.

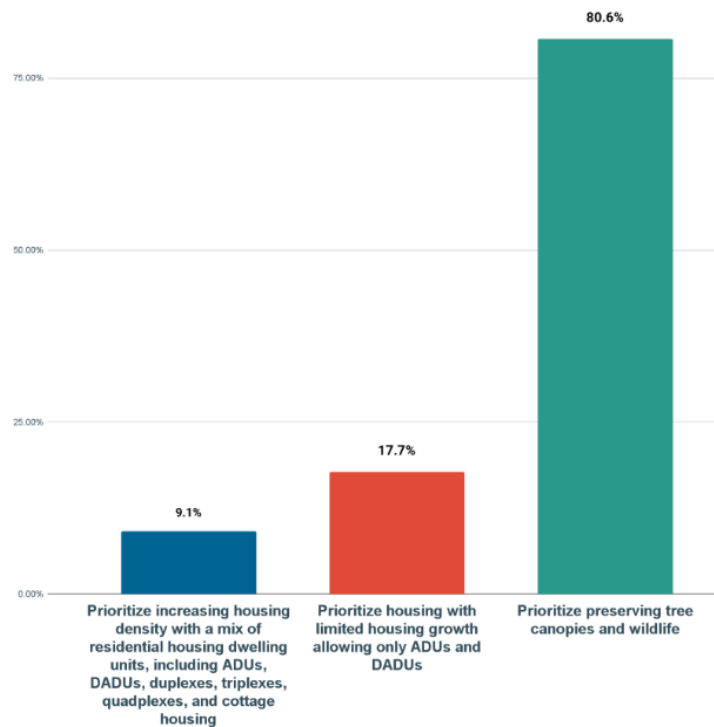
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Question:
 If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**



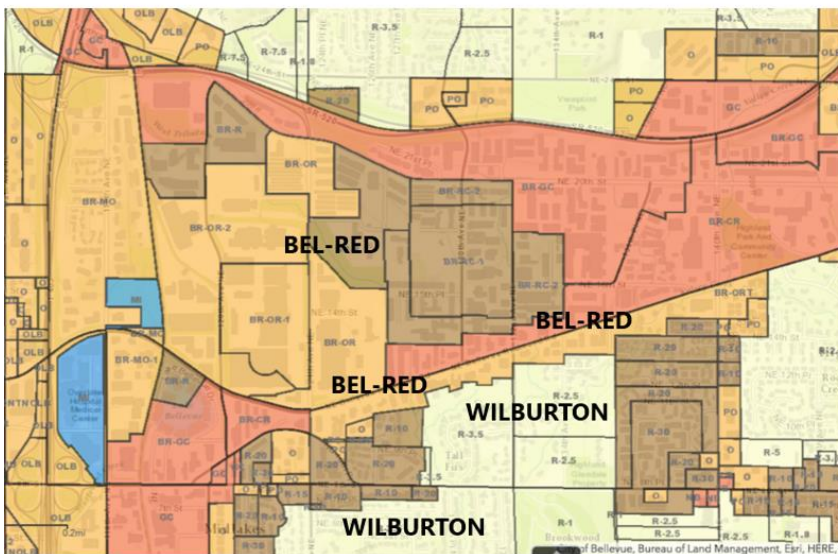
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- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the surrounding homes.
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
- Residential homes in critical areas need special considerations. The cumulative effects on critical areas need measured mitigation. The Wilburton neighborhood nearest to the Bel-Red development, for example, is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation of mature tree canopies are essential for the ecosystem in critical areas.
- Wilburton is one of the few critical areas remaining in the USA in a city with a similar population. Cumulative mitigations have not been established. Critical area residential zoning density should be maintained.

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
2. Consider that on average, individuals are likely to transition to different jobs, each in a different location approximately six times throughout their lifetime.

3. Employers are increasingly embracing remote work options and reducing their reliance on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider that reversing the environmental impact caused by such growth is unlikely to occur.
4. Alternative 3 does not ensure the job market and economic needs are met for different income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness secondary to drug use, susceptible to drug related crimes, and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued to live without jobs and homelessness.
5. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers using US Forest Service Inventory data show that increasing temperatures are causing growth declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere and mitigate the carbon dioxide by 25% while also removing air pollution, naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon fighting against rising temperatures.
*(3) Alternative 3 will cause the greatest effect on changing temperatures in residential areas. Consider a tree code.
6. Preservation of mature trees are essential for cooling stream temperatures for all aquatic and land wildlife and are part of their sensitive ecosystem.
7. Prioritize science and data. Oppose a recommended over development one size fits all approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and minimum setbacks. These are not reasonable principles and certainly not based on science and data. A one size fits all approach is not considering neighborhoods with diverse types of land.
8. Ensure housing typologies and pace of growth within neighborhoods are properly aligned. Consider developing housing options that complement the scale and character of the different neighborhoods.

BelRed Development and Wilburton



District	Designation
Bel-Red	Bel-Red
Bel-Red-Medical Office	Bel-Red-MO
Bel-Red-Medical Office Node	Bel-Red-MO-1
Bel-Red Office/Residential	BR-OR
Bel-Red Office/Residential Node 1	Bel-Red-OR-1
Bel-Red Office/Residential Node 2	Bel-Red-OR-2
Bel-Red Residential/Commercial Node 1	Bel-Red-RC-1
Bel-Red Residential/Commercial Node 2	Bel-Red-RC-2
Bel-Red Residential/Commercial	Bel-Red-RC-3
Bel-Red Commercial/Residential	Bel-Red-CR
Bel-Red Residential	Bel-Red-R
Bel-Red General Commercial	Bel-Red-GC
Bel-Red Office/Residential Transition	Bel-Red-ORT

The 900-acre BelRed development is less than a block away from Wilburton.

- By 2030, the BelRed 900-acre development is expected to generate 10,000 new jobs.
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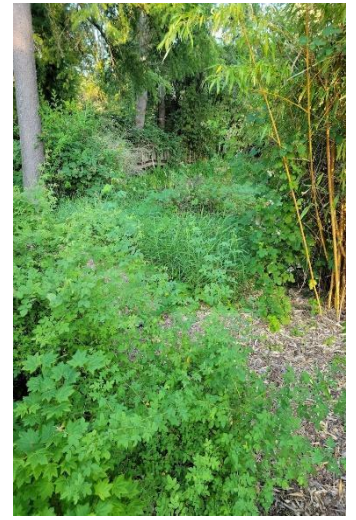
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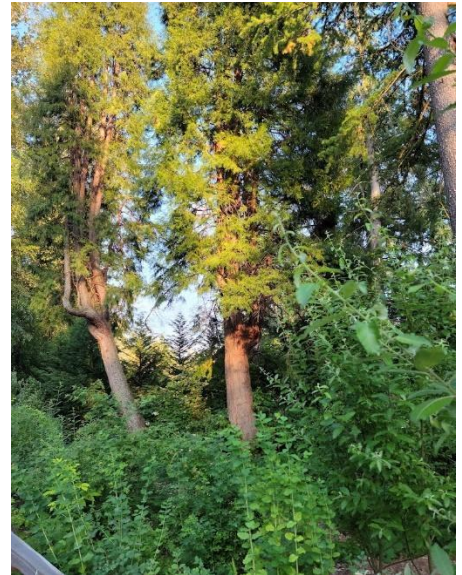
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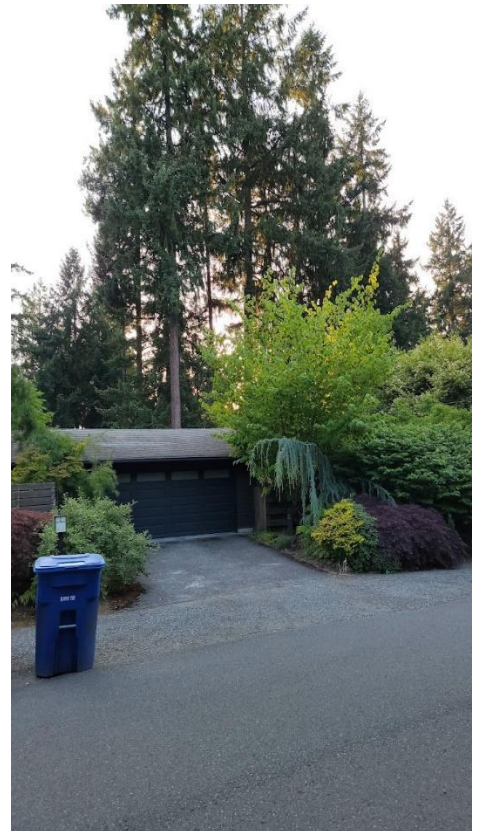
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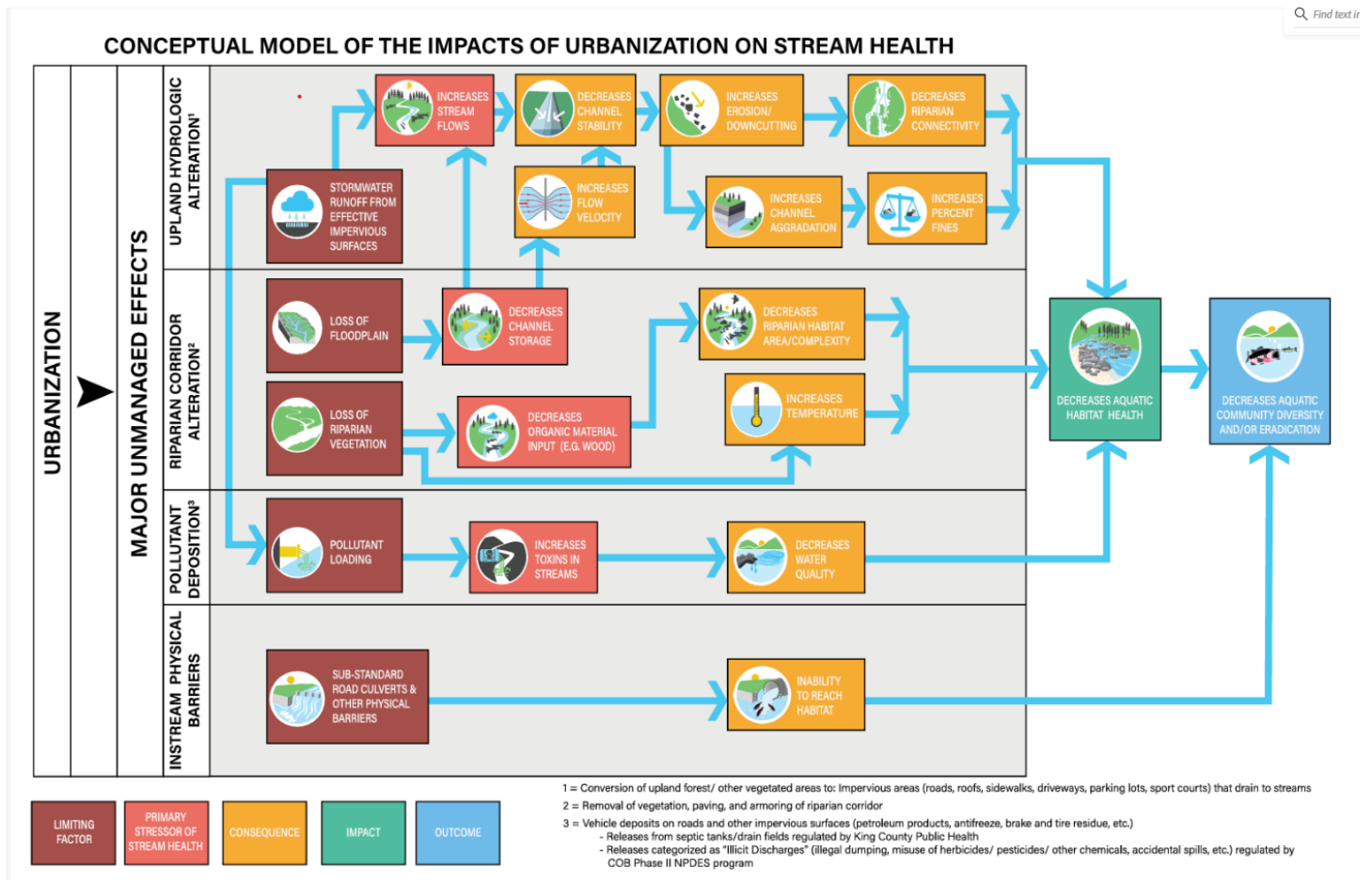


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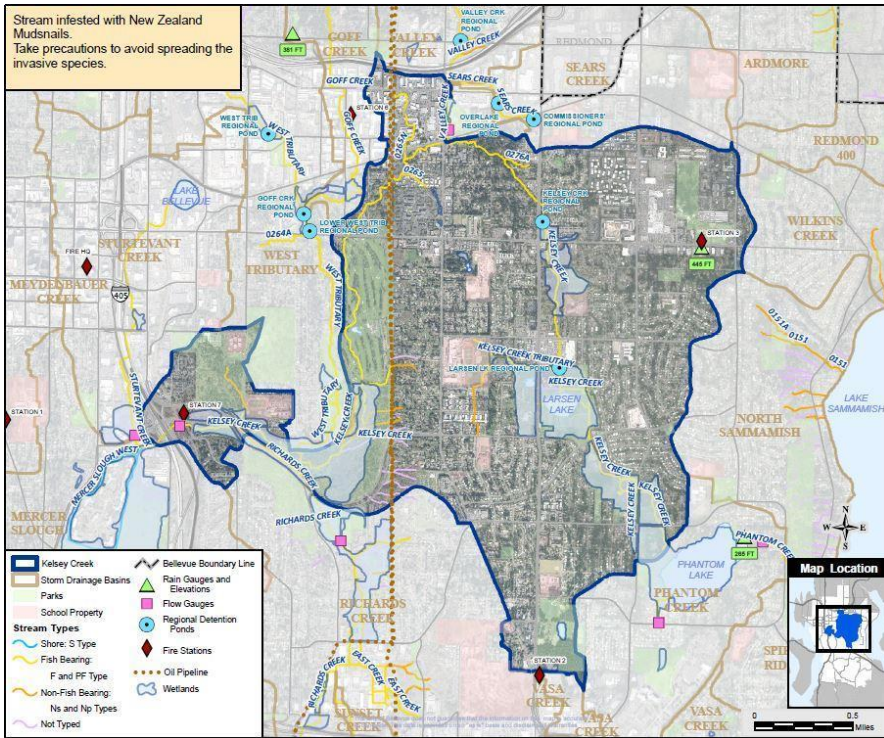
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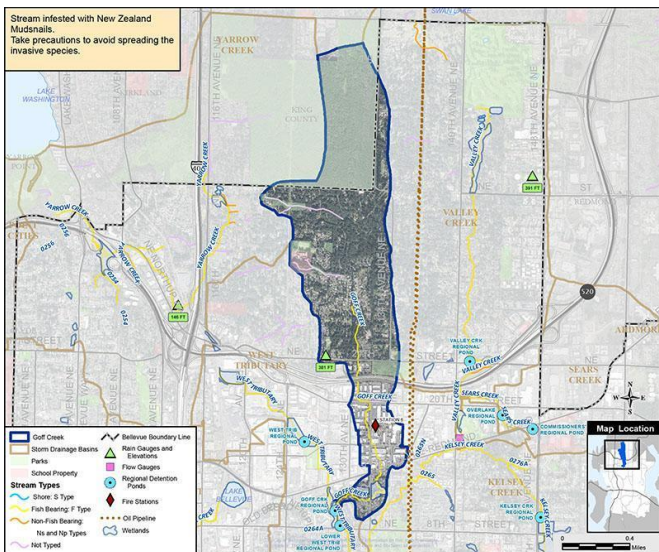


Kelsey Creek Drainage Details (City of Bellevue) *(2)
Salmon Present in the Basin

- Chinook*+
- Coho+
- Sockeye
- Cutthroat Trout

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Our Wilburton subarea is expected to grow. We sincerely hope that measures will be taken to ensure the growth is accompanied by safeguards that prioritize the safety of our neighborhood and preserve the unique environment that makes Wilburton so special. Being one of the few areas with tree canopies in a city of this size in the entire USA, the preservation of our environment was a primary factor in our decision to live here. I appreciate the opportunity to work with our city to provide housing and an inclusive community.

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Phyllis White
1057 134th Ave NE
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1. City of Bellevue Watershed Management Plan
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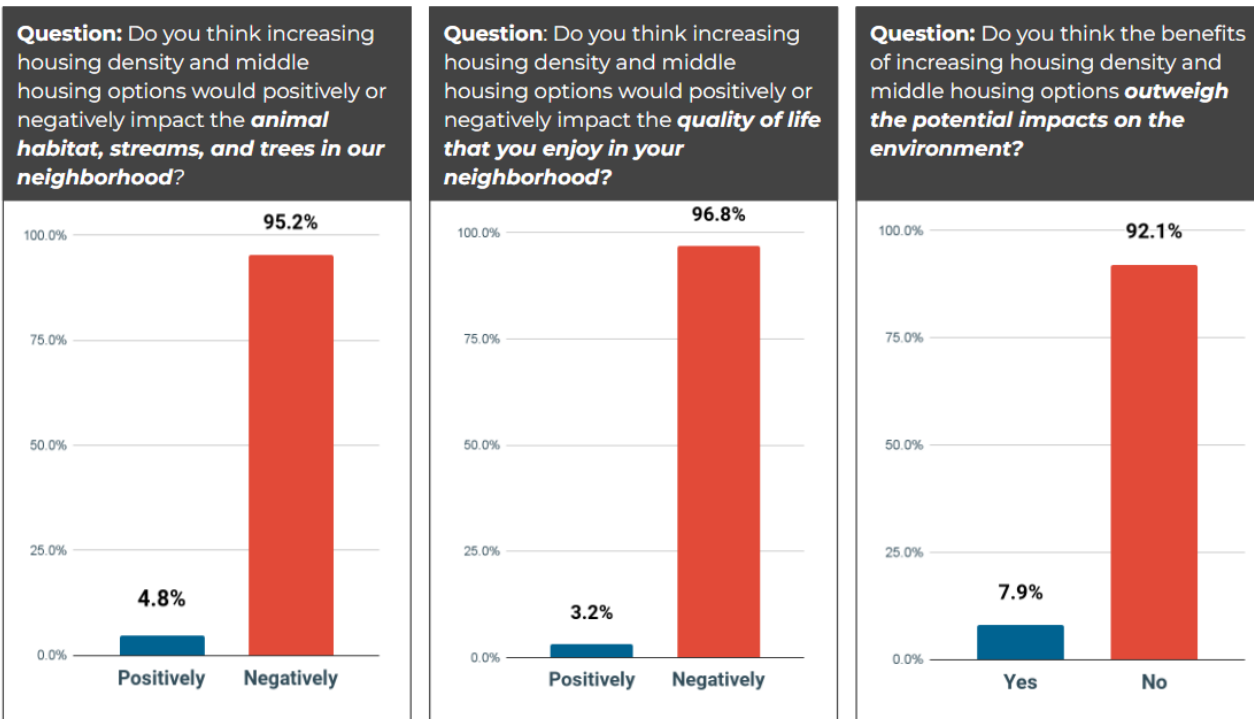
Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

My name is Steve Engen and I am a resident of Bellevue. Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS.

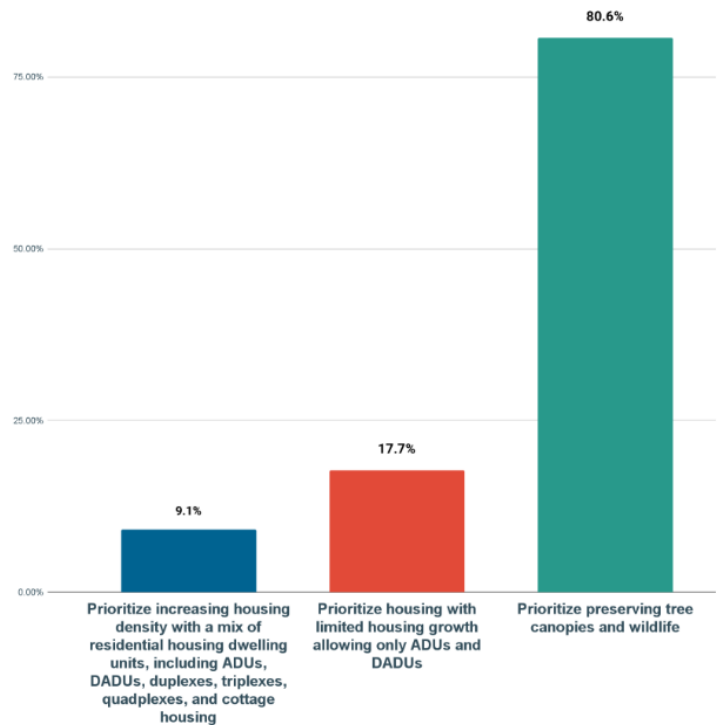
Neighborhood subareas next to major transit systems differ in character, density, landscape, and environment. A one-size-fits-all solution does not take into account the needs and characteristics of the affected areas and the impact it will have on residents' well-being, quality of life, and the natural environment. An approach tailored to meet our community's needs may improve the quality of life for all its residents.

Here are key priorities that our Wilburton neighborhood considers significant and important:

- Prioritize the preservation of Wilburton's environmental ecosystem as they are essential for the health and integrity of Wilburton's critical areas. A survey was undertaken, reaching out to every Wilburton accessible Wilburton home on our single-family residential streets nearest to Bel-Red. The survey results below show that the majority of residents prioritize the preservation of their neighborhood environment over housing density.



Question:
 If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**

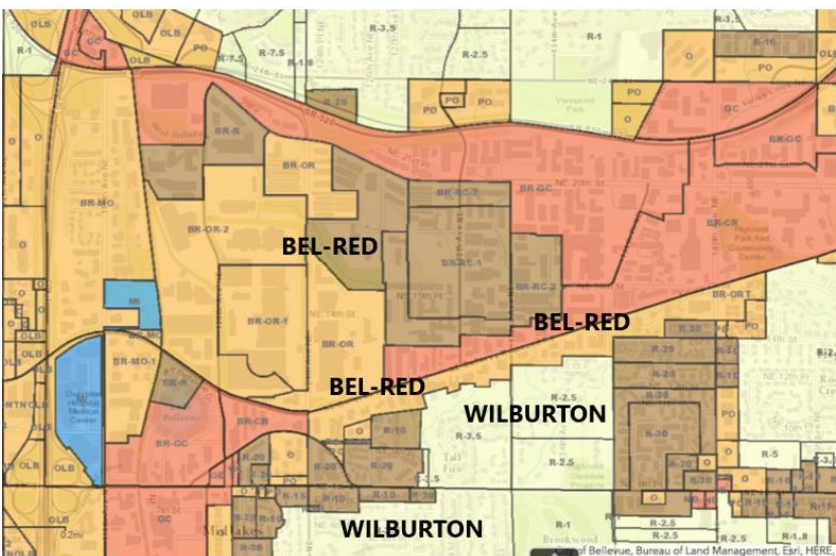


- Inform and ask Neighborhood Associations to reach out to their residents in an impartial, unbiased manner for input and feedback. Stress the need for an engagement process that allows ideas and avoids predetermined outcomes. This will ensure a transparent and inclusive process.
- Prioritize neighborhood residents who have vested interests in their community and are directly impacted. Bellevue residents encompass a rich diversity and a spirit of inclusivity and should be adequately represented.
- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the surrounding homes.
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
- Residential homes in critical areas need special considerations. The cumulative effects on critical areas need measured mitigation. The Wilburton neighborhood nearest to the Bel-Red development, for example, is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation of mature tree canopies are essential for the ecosystem in critical areas.
- Wilburton is one of the few critical areas remaining in the USA in a city with a similar population. Cumulative mitigations have not been established. Critical area residential zoning density should be maintained.

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
2. Consider that on average, individuals are likely to transition to different jobs, each in a different location approximately six times throughout their lifetime.
3. Employers are increasingly embracing remote work options and reducing their reliance on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider that reversing the environmental impact caused by such growth is unlikely to occur.

4. Alternative 3 does not ensure the job market and economic needs are met for different income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness secondary to drug use, susceptible to drug related crimes, and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued to live without jobs and homelessness.
5. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers using US Forest Service Inventory data show that increasing temperatures are causing growth declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere and mitigate the carbon dioxide by 25% while also removing air pollution, naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon fighting against rising temperatures. *(3) Alternative 3 will cause the greatest effect on changing temperatures in residential areas. Consider a tree code.
6. Preservation of mature trees are essential for cooling stream temperatures for all aquatic and land wildlife and are part of their sensitive ecosystem.
7. Prioritize science and data. Oppose a recommended over development one size fits all approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and minimum setbacks. These are not reasonable principles and certainly not based on science and data. A one size fits all approach is not considering neighborhoods with diverse types of land.
8. Ensure housing typologies and pace of growth within neighborhoods are properly aligned. Consider developing housing options that complement the scale and character of the different neighborhoods.



District	Designation
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Bel-Red-Medical Office	Bel-Red-MO
Bel-Red-Medical Office Node	Bel-Red-MO-1
Bel-Red Office/Residential	BR-OR
Bel-Red Office/Residential Node 1	Bel-Red-OR-1
Bel-Red Office/Residential Node 2	Bel-Red-OR-2
Bel-Red Residential/Commercial Node 1	Bel-Red-RC-1
Bel-Red Residential/Commercial Node 2	Bel-Red-RC-2
Bel-Red Residential/Commercial	Bel-Red-RC-3
Bel-Red Commercial/Residential	Bel-Red-CR
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Bel-Red-General Commercial	Bel-Red-GC
Bel-Red Office/Residential Transition	Bel-Red-ORT

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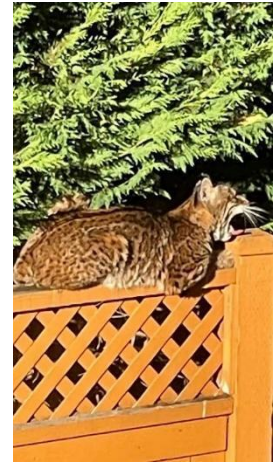
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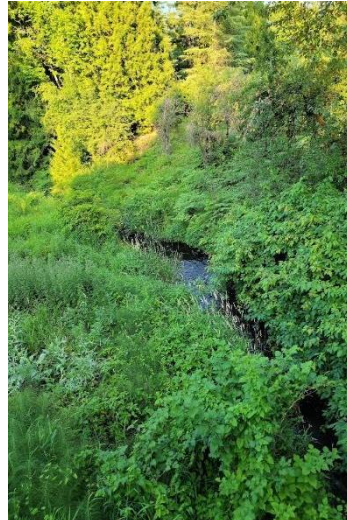
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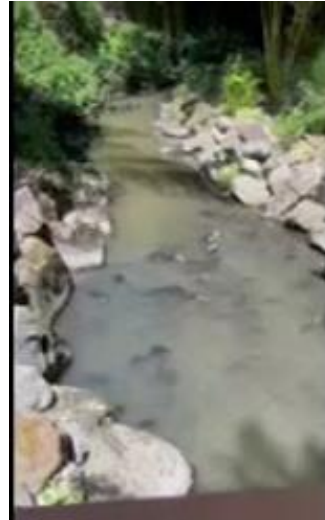
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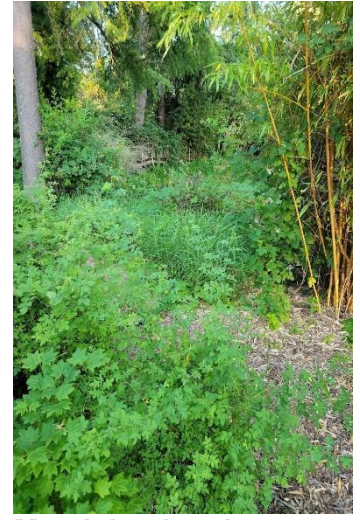
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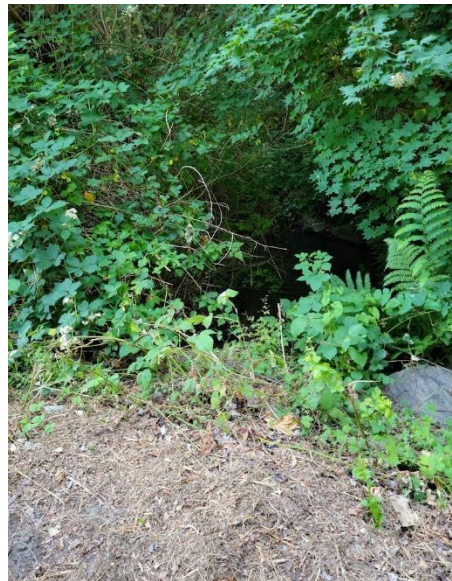


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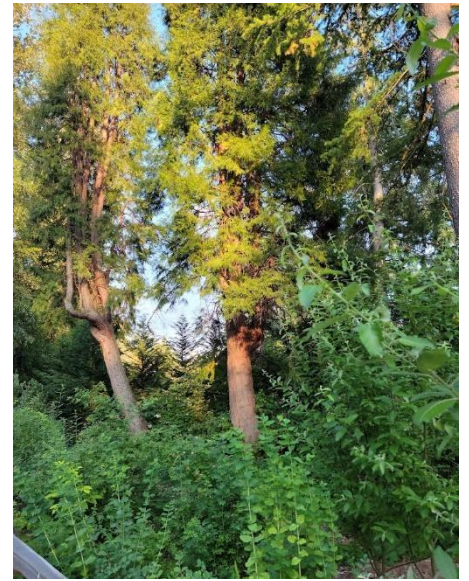
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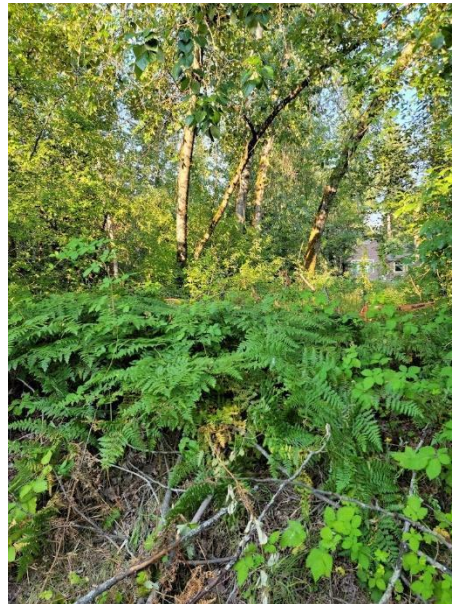
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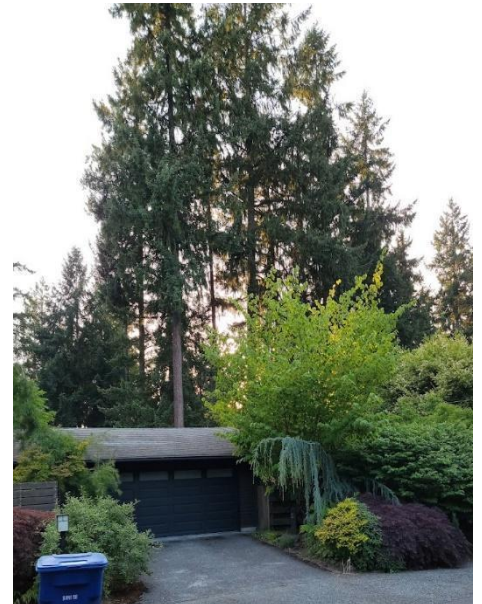
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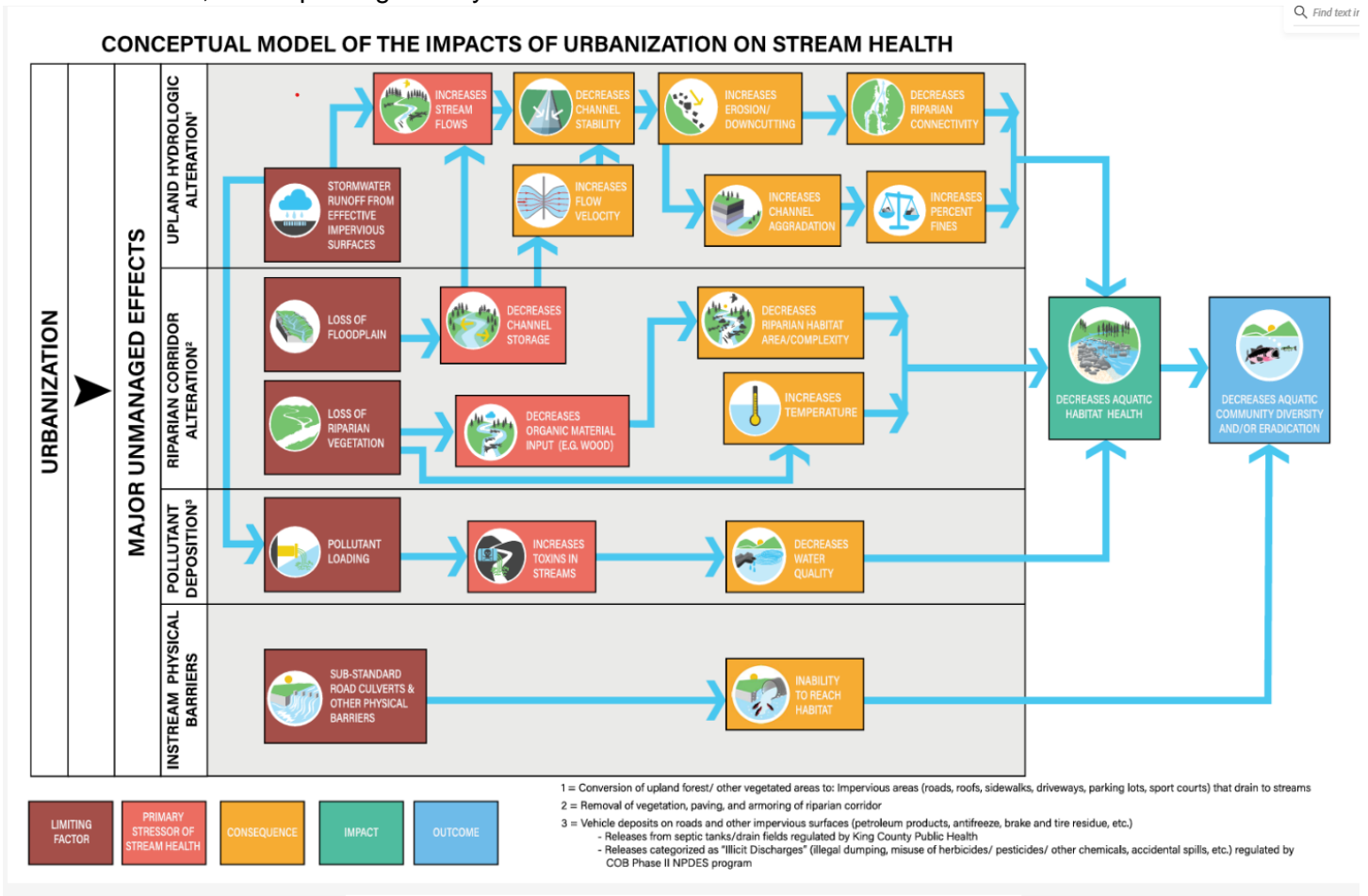
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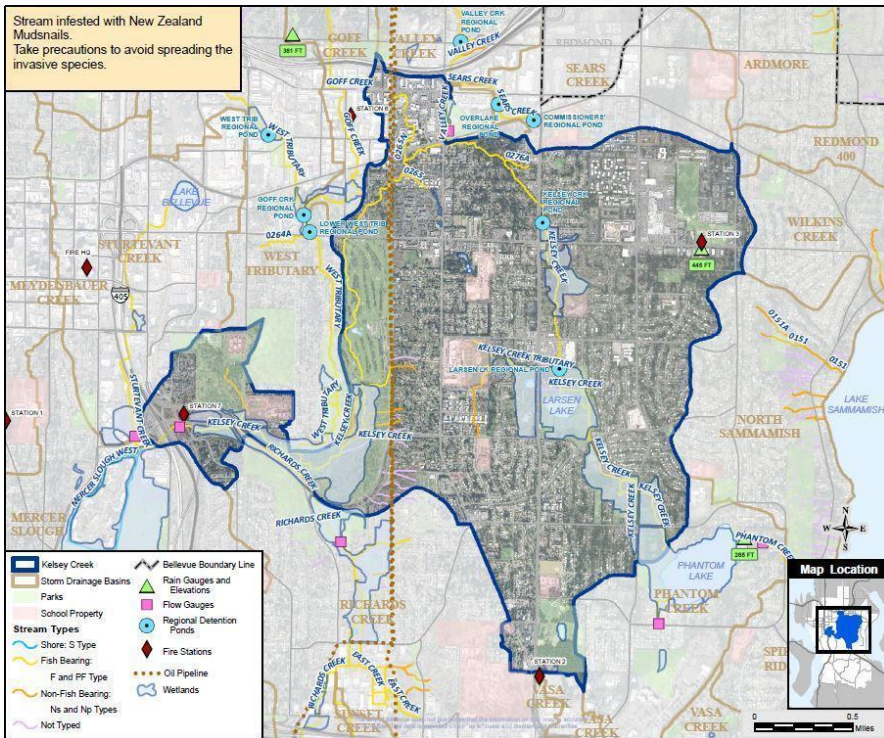
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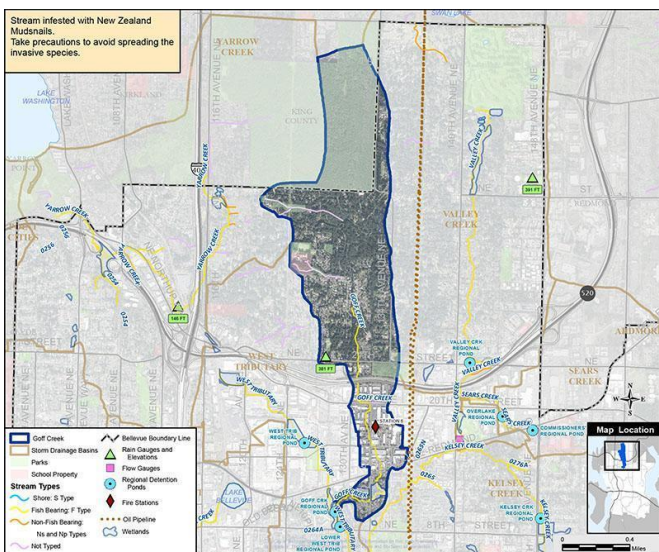
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- (3) [Climate change: Trees 'most effective solution' for warming - BBC News](#)

Please include me as a party of record.

Dear Chair Ferris, Vice Chair Bhargava, Commissioners, and Councilmember Robertson,

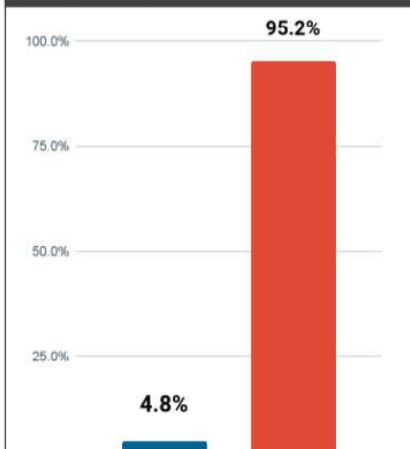
My name is Linda Ulrich, a 65 year resident of the City of Bellevue. Thank you for the opportunity to comment on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The information following will be familiar to you as the various Committees have spent untold hours gathering the information and facts for your consideration. In a quick comment, all around us we see high rises and multifamily apartments and condos. These necessarily bring noise and a lack of privacy. To invade the current residential areas that provide a necessary sense of quiet and privacy and green space for people is not only disheartening it feels a total denial of the purpose of building neighborhoods where kids can play in the street, animals do not have to be on a leash or live inside, birds and natural habitat can flourish. Bellevue was founded on the concept of “Beautiful View” and a respite from the “City” across the Lake. Please consider the following information in our plea to NOT create a density demand on our neighborhoods. Thank you.

Neighborhood subareas next to major transit systems differ in character, density, landscape, and environment. A one-size-fits-all solution does not take into account the needs and characteristics of the affected areas and the impact it will have on residents’ well-being, quality of life, and the natural environment. An approach tailored to meet our community’s needs may improve the quality of life for all its residents.

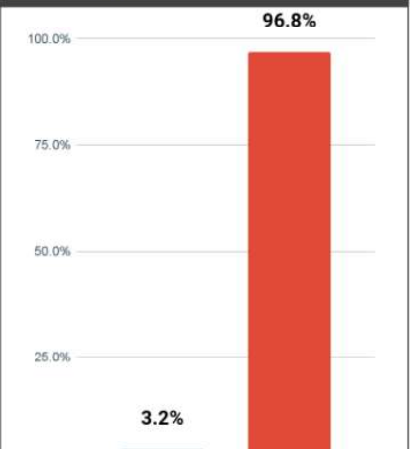
Here are key priorities that our Wilburton neighborhood considers significant and important:

- Prioritize the preservation of Wilburton’s environmental ecosystem as they are essential for the health and integrity of Wilburton’s critical areas. A survey was undertaken, reaching out to every Wilburton accessible Wilburton home on our single-family residential streets nearest to Bel-Red. The survey results below show that the majority of residents prioritize the preservation of their neighborhood environment over housing density.

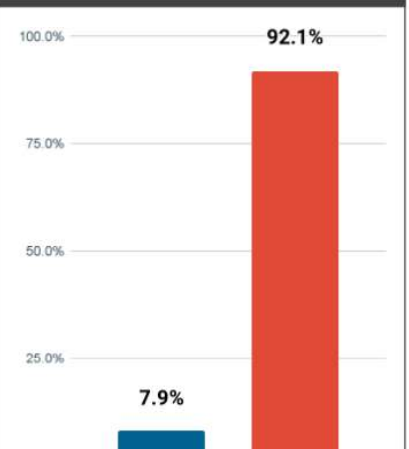
Question: Do you think increasing housing density and middle housing options would positively or negatively impact the **animal habitat, streams, and trees in our neighborhood?**



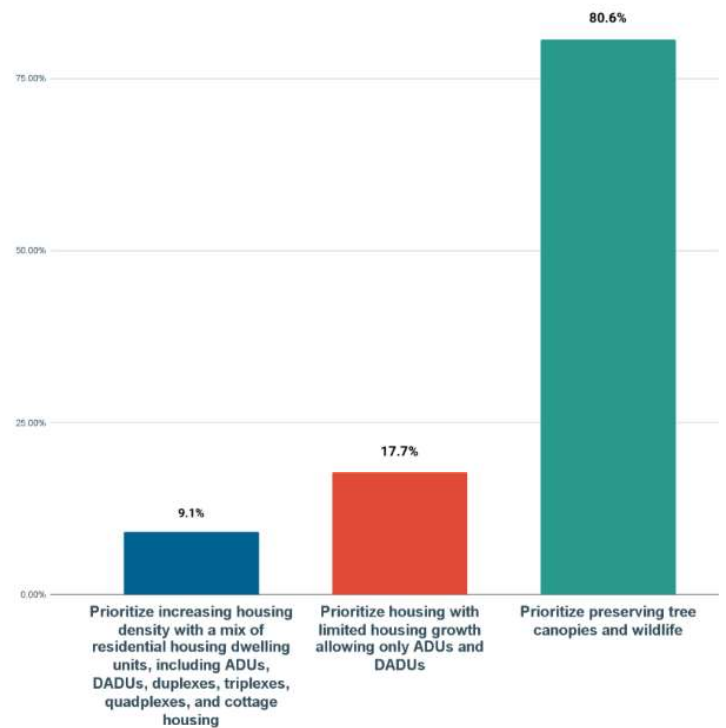
Question: Do you think increasing housing density and middle housing options would positively or negatively impact the **quality of life that you enjoy in your neighborhood?**



Question: Do you think the benefits of increasing housing density and middle housing options **outweigh the potential impacts on the environment?**



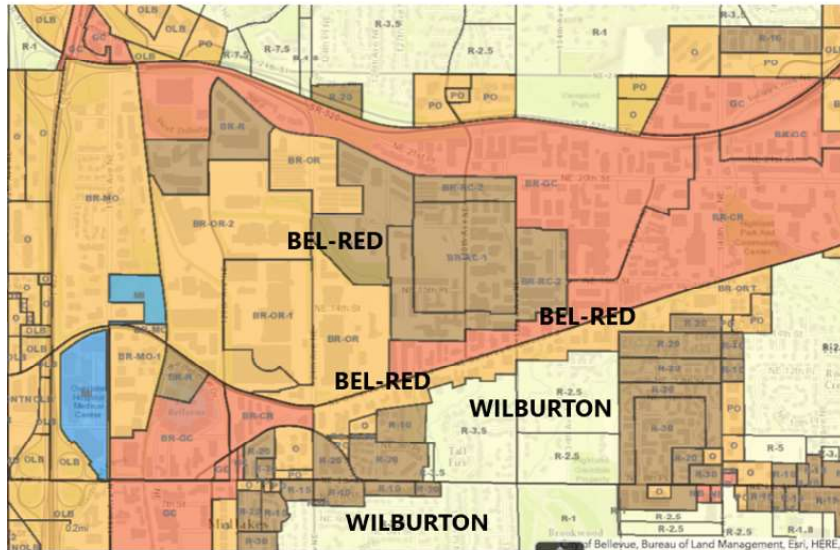
Question:
 If given the choice, would you prefer the Wilburton Subarea to **prioritize preserving the streams, tree canopies and the wildlife that depend on them or increasing housing density?**



- Inform and ask Neighborhood Associations to reach out to their residents in an impartial, unbiased manner for input and feedback. Stress the need for an engagement process that allows ideas and avoids predetermined outcomes. This will ensure a transparent and inclusive process.
- Prioritize neighborhood residents who have vested interests in their community and are directly impacted. Bellevue residents encompass a rich diversity and a spirit of inclusivity and should be adequately represented.
- Homes should fit the scale and character of their neighborhoods. Additionally, it is important to set height requirements that align with the surrounding homes.
- Consider requirements for the cumulative effects of housing density laws on climate temperatures, traffic, noise, air pollution, water pollution, and other environmental factors in neighborhoods and their maximum mitigation limits before a FEIS.
- Residential homes in critical areas need special considerations. The cumulative effects on critical areas need measured mitigation. The Wilburton neighborhood nearest to the Bel-Red development, for example, is in a critical area. Critical area setbacks of 200 feet from open streams should be a requirement for all of the properties in this area. Requiring preservation of mature tree canopies are essential for the ecosystem in critical areas.
- Wilburton is one of the few critical areas remaining in the USA in a city with a similar population. Cumulative mitigations have not been established. Critical area residential zoning density should be maintained.

Given the unpredictable economy and increasing options for remote work, Alternative 3 is not a desirable choice for the following reasons :

1. Alternative 2 OR a different alternative will provide for more flexibility with a changing economy and job market.
2. Consider that on average, individuals are likely to transition to different jobs, each in a different location approximately six times throughout their lifetime.
3. Employers are increasingly embracing remote work options and reducing their reliance on office spaces. The projected growth of 35,000 may be too ambitious. It is important to consider that reversing the environmental impact caused by such growth is unlikely to occur.
4. Alternative 3 does not ensure the job market and economic needs are met for different income levels. People who move to Bellevue without jobs and in a vulnerable market may be at high risk for challenges of displacement, homelessness, drug use, illegal drug sales, acute mental illness secondary to drug use, susceptible to drug related crimes, and increasing medical needs. Isolation, loneliness, and homelessness lead to declining health and well-being. This is evident in the city of Seattle where people attracted to Seattle's resources continued to live without jobs and homelessness.
5. The world is facing a dramatic climate change. Temperatures are rapidly rising, and researchers using US Forest Service Inventory data show that increasing temperatures are causing growth declines and slower growth in younger trees. Mature trees remove carbon dioxide in the atmosphere and mitigate the carbon dioxide by 25% while also removing air pollution, naturally and for free. The ability of trees to soak up carbon dioxide makes them a valuable weapon fighting against rising temperatures. *(3) Alternative 3 will cause the greatest effect on changing temperatures in residential areas. Consider a tree code.
6. Preservation of mature trees are essential for cooling stream temperatures for all aquatic and land wildlife and are part of their sensitive ecosystem.
7. Prioritize science and data. Oppose a recommended over development one size fits all approach including the Bellevue Commerce PLUSH Committee recommendations with 10% FAR and minimum setbacks. These are not reasonable principles and certainly not based on science and data. A one size fits all approach is not considering neighborhoods with diverse types of land.
8. Ensure housing typologies and pace of growth within neighborhoods are properly aligned. Consider developing housing options that complement the scale and character of the different neighborhoods.



District	Designation
Bel-Red	
Bel-Red-Medical Office	Bel-Red-MO
Bel-Red-Medical Office Node	Bel-Red-MO-1
Bel-Red Office/Residential	BR-OR
Bel-Red-Office/Residential Node 1	Bel-Red-OR-1
Bel-Red-Office/Residential Node 2	Bel-Red-OR-2
Bel-Red-Residential/Commercial Node 1	Bel-Red-RC-1
Bel-Red-Residential/Commercial Node 2	Bel-Red-RC-2
Bel-Red-Residential/Commercial	Bel-Red-RC-3
Bel-Red-Commercial/Residential	Bel-Red-CR
Bel-Red-Residential	Bel-Red-R
Bel-Red-General Commercial	Bel-Red-GC
Bel-Red-Office/Residential Transition	Bel-Red-ORT

BelRed Development and Wilburton

The 900-acre BelRed development is less than a block away from Wilburton.

- By 2030, the BelRed 900-acre development is expected to generate 10,000 new jobs.
- By 2030 the BelRed development is expected to generate 5,000 housing units.
- 2,514 housing units are being reviewed for construction as of December 2022.
- 6,433 parking spaces are currently being reviewed for the BelRed housing and business development – (This will cause significant traffic, noise, and air pollution.)

The Wilburton Vision Implementation will include another growth development with another 5,000 plus additional housing units on NE 116th.

Wilburton will be affected by tremendous growth. I support the inception and reinstatement of the following Wilburton/NE 8th Subarea Plan Goals:

"Wilburton/NE 8th Subarea Plan Goals

· To separate residential, recreational, and open space areas from commercial areas and to protect space.

· To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.

To support the provision of commercial services in Wilburton that complement Downtown..."

and:

"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."

I also support the following the inception of **Land Use Policies** that aligned with the Wilburton/NE 8th Subarea Plan:

"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.

and the previous policies protecting and preserving Wilburton's natural determinants, Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays an essential role that provides residents with a profound sense of well-being.

Wilburton Natural Determinants Policies:

"Policies

POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.

POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.

POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."

Photos of the Critical Areas

Below are a few photos of wildlife in our cul-de-sac and photos of some of our critical areas in neighboring streets:



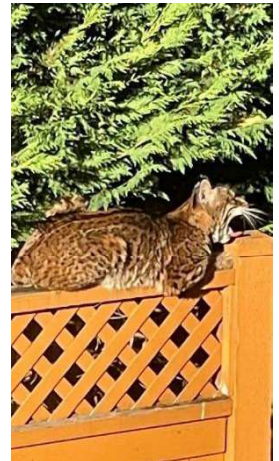
Red-tailed Hawk on neighbor's roof in Wilburton.



Another Hawk on a neighbor's Tree.



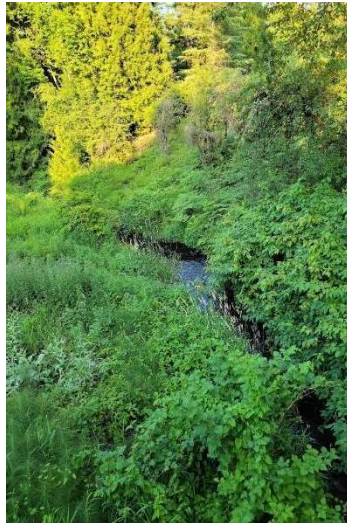
A Great Blue Heron, a Priority Species.



A Bobcat on my neighbor's Fence



A Bald Eagle flying over my neighbor's roof.



The Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.



Kelsey Creek in our neighbor's yard was unusually dirty last week.



Marsh land under a bridge in a neighboring street on 132nd.

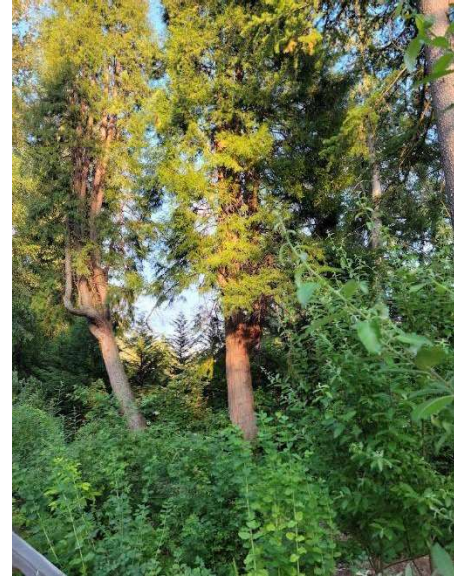
The neighborhood is in a critical area with many mature tree canopies. This area is being designated for R-Suburban, with single-family, duplexes, and cottage housing. Critical areas with many tree canopies would benefit remaining as low density housing (BCC 20.25H). Removing tree canopies negatively impact the already affected water and air temperatures, and the ecosystem and survival of Wilburton's wildlife. The sensitive ecosystem cannot be recovered with mitigation.



Tall Firs in Wilburton across of Bel-Red. Homes are surrounded by trees.



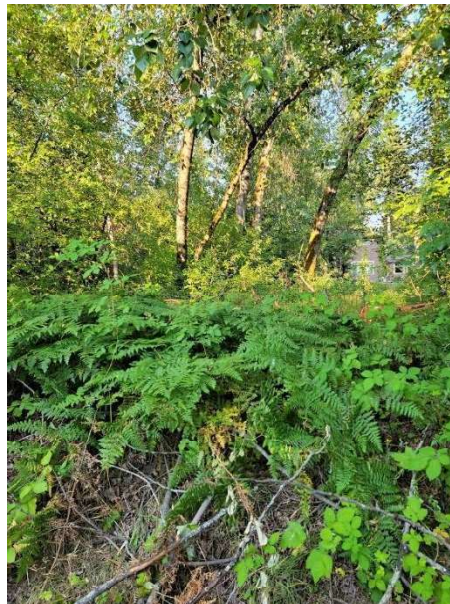
Goff Creek on 132nd where priority Cutthroat Trout live.



A backyard of a Wilburton home.



Dense tree canopies in the Wilburton area that cools water and air temperatures.



Wilburton home surrounded by marsh.



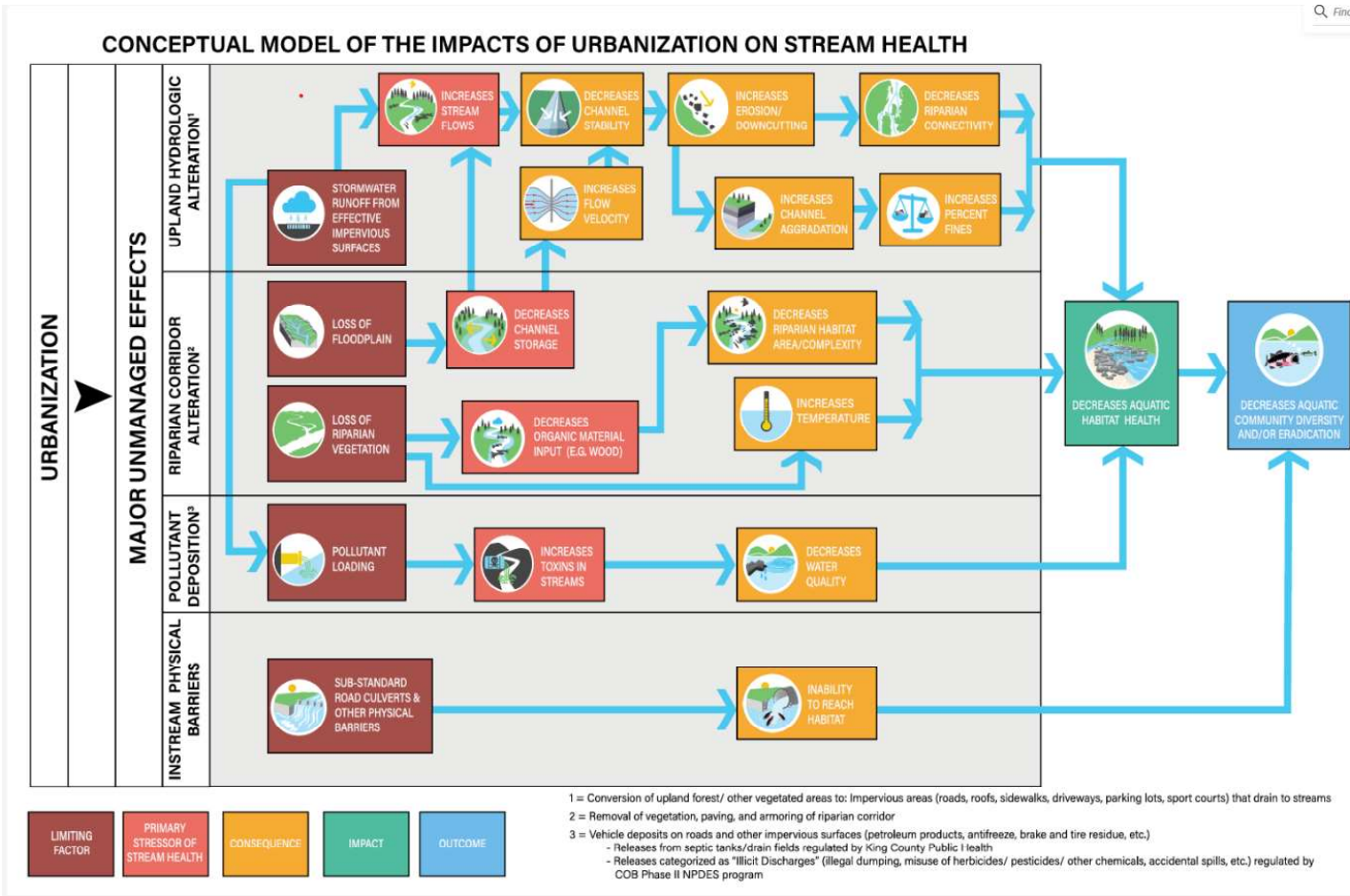
Homes in Wilburton, another example of the surrounding ecosystem which includes Goff Creek and Kelsey Creek.

“The land cover in the Greater Kelsey Creek Watershed is typical of urban watersheds with a lower percentage of tree canopy and higher percentage of impervious surface ... Within Bellevue, ownership of the riparian corridor across all of the subbasins within the Greater

Kelsey Creek Watershed is approximately 90 percent private property and 10 percent publicly owned (primarily parks)..."

Factors Affecting the Health of the Greater Kelsey Creek Watershed (1)

1. **Pollutant Loading:** Stormwater runoff from impervious surfaces includes road runoff, pollutants, contribute to the worsening habitat water quality for fish and wildlife.
2. **Stormwater Runoff from Effective Impervious Surfaces:** The City's flow control for new development has shown not to be effective at protecting streams from erosion.
3. **Road Culverts and Other Physical Barriers:** A number of physical barriers including undocumented barriers on private properties preventing fish passage for spawning and/or rearing have been identified in all the streams of the Greater Kelsey Creek Watershed.
4. **Loss of Floodplain and Riparian Function:** Urban development has confined and reduced the natural occurrence of wood entering many of the stream reaches in the Watershed. Tree canopies are becoming largely concentrated in parks reducing floodplain storage. This is leading to high velocities and flowrates. The City has invested tens of millions of dollars in the Greater Kelsey Creek Watershed over the past 15 years on in-stream projects that include repairing stormwater outfalls, stabilizing stream slopes, removing fish passage barriers, catching and removing fine sediment, and improving conveyance.



Laws Protecting Wilburton Critical Areas

WAC 365-196-580 Integration with the Shoreline Management Act

The Shoreline Management Act adds goals and policies as set forth under RCW 90.58.020 with equal order of priority goals under 36.70A.020.

Wilburton has the **Kelsey Creek Watershed System**, which includes **Goff Stream**, and is subject to Bellevue City Code Part 20.25H Critical Areas Overlay District. (1) :

“Critical Areas

Critical areas are parts of the landscape afforded special protection because they provide unique environmental functions that are difficult, if not impossible, to replace. The code protects six types of critical areas:

Streams and Riparian Areas

([LUC 20.25H.075](#)) Streams are classified into four types, based on their flow and capacity to support fish. Artificial channels (e.g., ditches) are generally not protected, unless they are used by salmonids or convey a stream that previously occurred naturally in that location.

A healthy stream needs healthy riparian areas along its banks and floodplain. Riparian vegetation provides shade, which protects water quality; retains soil, which prevents erosion that can affect salmon spawning and feeding areas; holds back flood flows; and provides wildlife habitat and the large woody debris that stores sediments, slows flood velocities, and creates good fish habitat.

Wetlands

([LUC 20.25H.095](#)) Wetlands include the vegetated edges of ponds and areas commonly called swamps, marshes, and bogs. Frequently, their water is only visible in the spring. Wetlands are classified into four categories, based on a combination of habitat, water quality, and flood-flow-reduction functions.

Wetlands provide rearing and foraging habitats for fish and wildlife and food chain support for downstream waters. Wetlands provide natural water quality improvement; flood-flow reduction and storage; shoreline erosion protection; and opportunities for passive recreation. Many urban wetlands are heavily disturbed, but still provide valuable water quality treatment and flood-flow reduction.

Habitats for Species of Local Importance

([LUC 20.25H.150](#)) Species of local importance are specifically recognized local populations of native species that are at risk of being lost from Bellevue—western pond turtle, Oregon spotted frog, western toad, Chinook salmon, bull trout, coho salmon, river lamprey, bald eagle, peregrine falcon, common loon, pileated woodpecker, Vaux's swift, merlin, western grebe, great blue heron, osprey, green heron, red-tailed hawk, western big-eared bat, Keen's myotis (bat), long-legged myotis (bat), and long-eared myotis (bat)—and whose presence can be an indicator of environmental health.

Habitats for these species provide the food, water, nesting/rearing, and cover necessary to support their populations. Protected habitats include naturally occurring ponds under 20 acres, concentrations of dead trees, caves and roosting structures, and large stands of conifers.

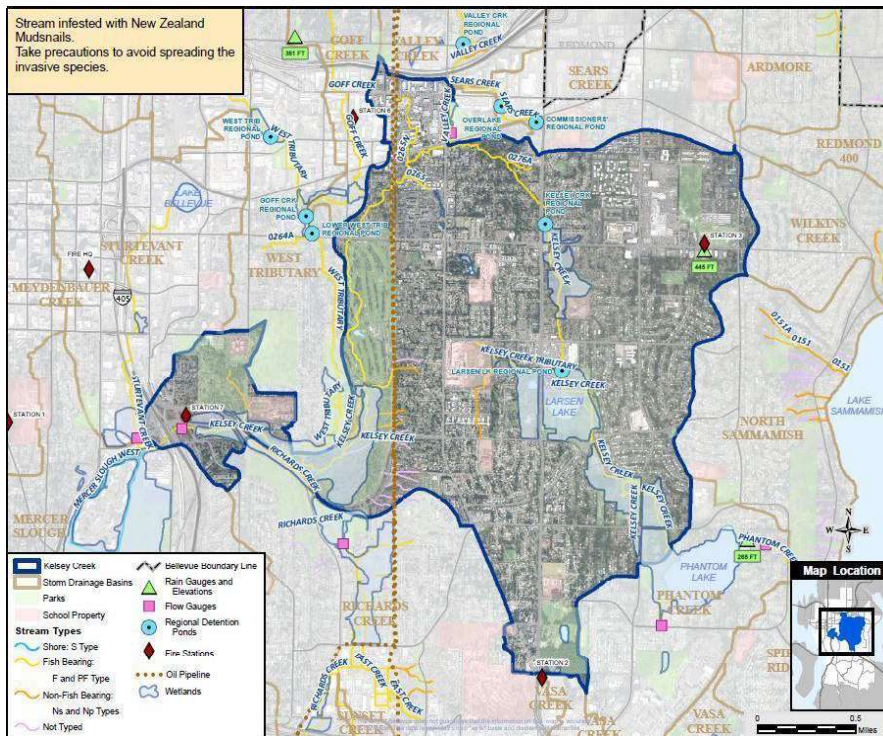
Geological Hazard Areas

([LUC 20.25H.120](#)) Geological hazard areas—landslide hazard areas, steep slopes, and coal mine hazard areas—are areas susceptible to erosion, sliding, earthquake, or other geological events. Because of their conditions, these areas pose a threat to health and safety when development is sited too close.

Geological hazard areas are regulated mainly for these safety reasons but also for their habitat values. Several of Bellevue's large blocks of forest are on steep slopes, providing wildlife habitat and important movement corridors. Steep slopes can also be conduits for groundwater draining from hillsides to form the headwaters of wetlands and streams.

Flood Hazard Areas

(LUC 20.25H.175) Flood hazard areas are those subject to 100-year floods (identified on FEMA Flood Insurance Rate Maps). These areas are designated to protect development from flooding and to protect the inherent functions of floodplains. Undeveloped floodplains store water and slow the downstream delivery of flood flows, reducing the impacts of a flood and recharging wetlands, streams and underground aquifers. Floodplain development reduces the floodplain's water storage capacity and puts valued property and infrastructure in the path of floodwaters. Runoff from impervious surfaces changes flood size and frequency and can degrade water quality.”



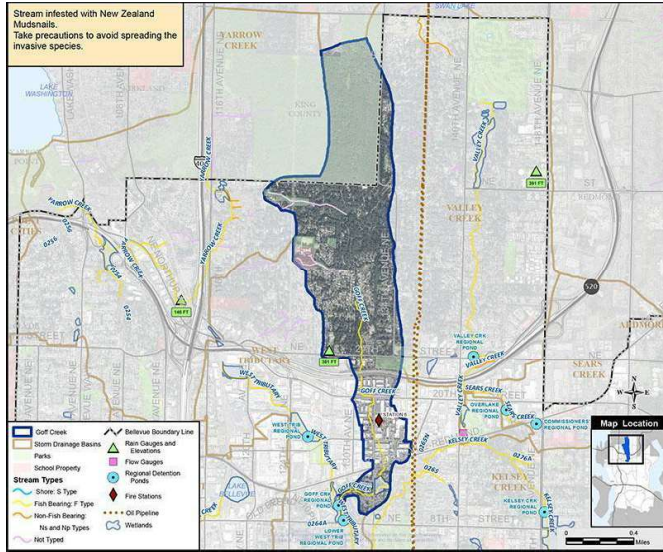
Kelsey Creek Drainage Details (City of Bellevue) *(2)

Salmon Present in the Basin

- Chinook*+
- Coho+
- Sockeye
- Cutthroat Trout

* Listed Federal Endangered Species

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)



Goff Creek – (City of Bellevue) *(2)

Salmon Present in the Basin

- **Chinook*+**
- **Coho+**
- **Sockeye**
- **Rainbow & Cutthroat Trout**

*** Listed Federal Endangered Species**

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)

Our Wilburton subarea is expected to grow. We sincerely hope that measures will be taken to ensure the growth is accompanied by safeguards that prioritize the safety of our neighborhood and preserve the unique environment that makes Wilburton so special. Being one of the few areas with tree canopies in a city of this size in the entire USA, the preservation of our environment was a primary factor in our decision to live here. I appreciate the opportunity to work with our city to provide housing and an inclusive community.

Sincerely,

Linda Ulrich
 1060 134th AVE NE
 Bellevue, WA 98005

- (1) City of Bellevue Watershed Management Plan
- (2) <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
- (3) [Climate change: Trees 'most effective solution' for warming - BBC News](#)

Gulledge, Kristin

From: Cheryl Wang <cheryl1278@comcast.net>
Sent: Wednesday, July 12, 2023 4:55 PM
To: PlanningCommission
Subject: Wilburton Neighborhood Plans

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To The Planning Commission,

Please do NOT grow in density our Wilburton neighborhood. If you do this, the dense housing and population will cause damage and pollution to the water quality for fish and wildlife.

Critical areas that are IRREPLACEABLE are:

- 1) Streams and riparian areas
- 2) Wetlands
- 3) Habitats for species of local importance
- 4) Geological hazard areas
- 5) Flood hazard areas

Please keep this part of Bellevue as is. There are enough brand new condos, apartments, shops etc.....all over downtown Bellevue. Please leave the neighborhoods alone!!

Sincerely,
Cheryl Wang
Wilburton Resident

Gulledge, Kristin

From: Chris Marks <chrismarks4@gmail.com>
Sent: Wednesday, July 12, 2023 10:26 PM
To: PlanningCommission
Subject: Wilburton Draft Comprehensive Plan Amendments
Attachments: image001.jpg

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Wilburton Draft Comprehensive Plan Amendments

July 12, 2023

Chris Marks - 1805 102nd Pl SE, 98004

I appreciate all the work to date on the Comp Plan to come that will allow density and affordable housing while maintaining our values such as livability, climate, tree canopy, open space, walkability, etc.

I support the Wilburton Draft Comprehensive Plan Amendments. I propose a few additions for your consideration:

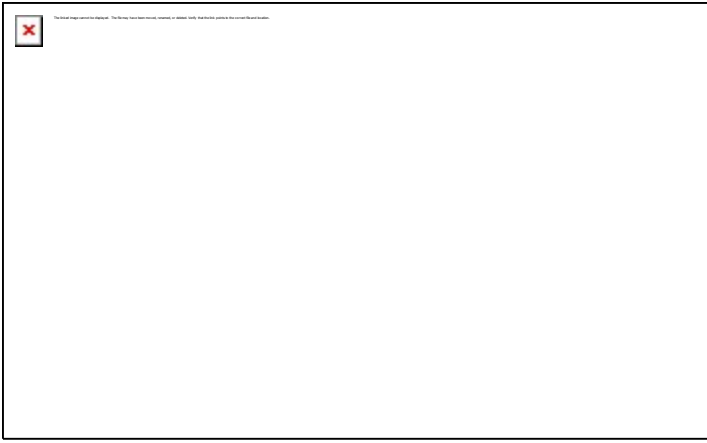
Proposed New UD Additions:

1. Require pedestrian pathways to connect all buildings.
2. Allow for adjacent development to provide upper-story or podium connections to adjacent properties.
3. Require all new construction, including all residential, to be LEED platinum or net zero construction.
4. Allow/require housing development include common space and minimization of new access roads (see picture below).
5. Require all driveways to be pervious or otherwise be "green."
6. Require tree landscaping to provide shade and to mitigate heat islands over all paved surfaces including sidewalks, pathways, parking lots and other significant paved surfaces.
7. Require all buildings to install green roofs or otherwise mitigate roof top heat islands.
8. Require all large buildings to capture and reuse grey water.
9. Require all new construction, including all residential, to capture and use rainwater for landscaping irrigation.
10. Require full recycling services across Wilburton.

Thank you for your consideration,

Chris Marks

Example of common space and minimum paved access roads:



Gulledge, Kristin

From: Lee Sargent <LeeSgt@aol.com>
Sent: Tuesday, July 18, 2023 1:04 PM
To: Council
Cc: PlanningCommission
Subject: A Couple of Thoughts from Bellevue Council mtg 7/17/2023

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Wilburton Comprehensive Plan option 3 update

I was very impressed by the discussion around the Wilburton Comprehensive Plan update. Because of the questions and insights some by council members and some by staff, I got a clearer picture of what was being presented and how to get better information for this process. From staff the process was clarified that the process so far was really to setup the parameters for what Environmental Impact issues to deal with. Because of Councilmember Robertson specifying the residential areas that were being affected by option 3 for traffic impact, it narrowed the focus for possibly the most important factor to study. This made sense because the traffic is the biggest issue that we have dealt with in other areas. Pollution, noise, congestion and behavior are strongly affected. The Wilburton area option3 extends so broadly that the analysis is difficult to attain-different building types, different zoning, different requirements, different areas of the city, etc. Narrowing to a few key issues of analysis reduces the complexity immensely. It was also almost as an aside that there was no reason to expand the area of Wilburton changes because of HB1110 and SB1337 requirements. This last was said and then amplified as it seemed logical by several others of the council. (I could almost feel the tension release when this very thought released the need for incorporating the larger area as it will be dealt with separately and more appropriately to the needs of the each area. Wow.) Complexity reduced and focus on the area of greatest impact for learning what will work with people that were going to be impacted in either way. Wonderful work by the council! Easier to manage development and modeling for staff! and clarity for the Planning Commission.

Comprehensive Plan changes for the Tree Code

There is a clearly a broad support from those that have attended the many meetings for Great Neighborhoods and Bellevue 2044. (The difficulty is to determine what that means for the Comprehensive Plan. Trees are one of those pervasive items in our environment that exist and are appreciated when they give us something but removed if they are in the way, block what we want to see, are messy, and/or are perceived as a threat)

- Putting them in the Comprehensive Plan gives them a legal presence and definition as a part of our city.
- Trees of a certain type, size represent the substantial growth to maturity that provides substantial resilience to natural destruction and providing the most consistent resources to the city.
- Adding the regulations for what can be done with them, how it needs to be done, and the consequences of failure to comply make them a valued city resource. Similar to how homes, buildings and other permanent fixtures on property are monitored by the city for compliance.

- We have made some good first steps.

(We are at a cross roads that can easily be ignored. If we can not see that we need to leave room for these trees and, therefore, allow them to be treated as mere temporary objects up to the whim of the current land owners/developers. We will lose the trees and the places to grow trees.)

Thanks for your time and consideration,

Lee Sargent

425-641-7568

16246 NE 24th ST

Bellevue, WA 98008-2414

trees4livability.org

Gulledge, Kristin

From: Neal Mulnick <neal@clover.capital>
Sent: Wednesday, July 12, 2023 3:06 PM
To: PlanningCommission
Cc: Shull, Janet; King, Emil A.; Panganiban, Justin; Johnson, Thara
Subject: Wilburton Vision Implementation – 7/12 Draft CPA Comments

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Re: Wilburton Vision Implementation – 7/12 Draft CPA Comments

Dear Chair Ferris and Planning Commissioners,

We are the owners of the Ford AutoNation Site at 411 116th Avenue NE and are writing to provide comment on the City's proposed draft Comprehensive Plan Amendments (CPAs) for the Wilburton Vision Implementation that are on tonight's meeting agenda. On the whole, we support the proposed CPAs and believe they represent strong policy positions for the City that will help achieve the Wilburton neighborhood the City envisions for a urban, trail- and transit-oriented mixed-use community. We are, however, concerned with proposed New Urban Design Policy UD-5 that reads: "Minimize exposure to noise and poor air quality around high-volume roadways through building and site development standards."

Concern over noise and air quality from high volume roadways like I-405 is valid as these issues impact livability and health of Bellevue residents, and we agree they should be considered in future development. However, we disagree the City should adopt stringent building and site development standards to address these concerns (like the residential buffers which were an identified DEIS mitigation measure). Stringent standards will only serve to stifle development, and they not make sense when other mitigation is available.

First, these issues are not a concern that require regulation in our opinion as building developers will already take them into account during design in order to satisfy concerns of future residential and office building tenants. For buildings to be marketable, interior spaces must have low ambient noise and high air quality. These expectations are highest for tenants considering new construction. So, the suggested UD-5 is a solution looking for an issue. The City should simply forego stringent regulation in this area. Similar policies are not currently found in other areas of the City.

Further, we are confident that there are an array of technical solutions to address these concerns, like air filtration, window systems, and others. We anticipate these technical solutions will advance faster than the City's code, and it would be a shame for projects to be limited from implementing new technology because of outdated code that is focused on site development standards. Again, we would encourage the City to forgo regulation in this area and simply remove New UD-5 from consideration. Short of that, we recommend updating UD-5 to read "**Encourage new development to minimize exposure to interior noise and poor air quality around high-volume roadways by employing mitigating design and development standards, site planning, or technical solutions.**"

Thank you for this opportunity to comment, and we look forward to continuing to engage with you throughout the CPA process for Wilburton.

Sincerely,
Neal Mulnick

--

Neal Mulnick

Clover Capital LLC

Cell: 253-973-7770 | Office: 425-746-1500 | neal@clover.capital | VisitClover.com

14510 NE 20th Street - Suite 205, Bellevue, WA 98007



Gulledge, Kristin

From: Paul Bruno <pbruno3@comcast.net>
Sent: Wednesday, July 12, 2023 3:09 PM
To: PlanningCommission
Subject: Wilburton Draft Comprehensive Plan Amendments - Comment

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Wilburton Draft Comprehensive Plan Amendments

Paul Bruno - 369 101st Avenue S.E. Bellevue 98004

Hello Planning Commissioners,

I appreciate all the work to date on the Comp Plan to come that will allow density and affordable housing while maintaining our values such as livability, climate, tree canopy, open space, walkability, etc.

I support the Wilburton Draft Comprehensive Plan Amendments. I propose a few additions for your consideration:

Proposed New UD Additions:

1. Require pedestrian pathways to connect all buildings.
2. Allow for adjacent development to provide upper-story or podium connections to adjacent properties.
3. Require all new construction, including all residential, to be LEED platinum or net zero construction.
4. Allow/require housing development include common space and minimization of new access roads (see picture below).
5. Require all driveways to be pervious or otherwise be "green."
6. Require tree landscaping to provide shade and to mitigate heat islands over all paved surfaces including sidewalks, pathways, parking lots and other significant paved surfaces.
7. Require all buildings to install green roofs or otherwise mitigate roof top heat islands.
8. Require all large buildings to capture and reuse grey water.
9. Require all new construction, including all residential, to capture and use rainwater for landscaping irrigation.
10. Require full recycling services across Wilburton.

Thank you for your consideration,

Paul Bruno
425-785-5256
Sent from my iPad

			Wilburton, “requiring excessive parking tacitly encourages and, in some cases, subsidizes auto-dependence. Requiring less parking promotes transit and nonmotorized travel.” A multi-modal future that avoids vehicle gridlock is what we want to achieve in the Wilburton TOD area and eliminating parking based on transit proximity will support this future.
NEW LU-5	Develop compact, mixed-use site and neighborhood configurations that support active transportation.	<i>Retain this policy concept, and add requested New UD-10.</i>	<p>In order to achieve efficient and compact development it is imperative that small sites have densities and flexibility available to support redevelopment. We suggested NEW UD-10 below that complements this LU policy concept well, and we request you include it in further policy drafts:</p> <p><u>NEW UD-10:</u> <u>Recognize that sites smaller than 40,000 square feet have unique development constraints and provide flexibility in development standards to ensure they can be developed to meet the Wilburton Vision.</u></p>

Please do not hesitate to reach out to me if you have any follow-up questions.

Thanks,

Abbey

Abigail Pearl DeWeese

Hillis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104
d: **206.470.7651** | 206.623.1745 | f: 206.623.7789
abigail.pearl@hcmp.com | www.hcmp.com | vCard | view my bio

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From: Abigail Pearl DeWeese
Sent: Wednesday, July 12, 2023 1:50 PM
To: PlanningCommission@bellevuewa.gov
Cc: Janet Shull <jshull@bellevuewa.gov>; King, Emil A. <EAKing@bellevuewa.gov>; Johnson, Thara <TMJohnson@bellevuewa.gov>; jpanganiban@bellevuewa.gov; Campbell Mathewson <cmathewson@cmrepartners.com>
Subject: Wilburton Vision Implementation Draft Comprehensive Plan Amendments -7/12 Study Session Comments

Dear Chair Ferris and Planning Commissioners,

Thank you for your continued work on the Wilburton Vision Implementation. The Comprehensive Plan amendments you are beginning to consider will set the stage for the Wilburton neighborhood to become a vibrant urban destination where Bellevue residents of all backgrounds can live, work, learn, and play. We represent the owners of the property in Wilburton located at 11635 NE 8th Street, who are Midlakes LLC and the Matthewson Family. The property is immediately adjacent to the west of Eastrail and across the street from the Wilburton Station, and is a great candidate for redevelopment to meet the City’s Wilburton vision. We have reviewed the proposed Comprehensive Plan policies from staff for tonight’s meeting. Staff have provided a great initial framework – we have just a few suggestions. We have organized our comments into a table format so you can easily see our suggestions with strike outs/underlines, along with supporting rationales.

Policy Number	Proposed Text	Suggested Text	Rationale
New ED-2	Implement small format retail space to increase access to affordable space for smaller-scale retailers, emphasizing trail-oriented retail along Eastrail and the Grand Connection.	Implement <u>Incentivize</u> small format retail space <u>in specific locations</u> to increase access to affordable space for smaller-scale retailers, emphasizing trail-oriented retail along Eastrail and the Grand Connection.	Ground-level retail space is still recovering from the COVID-19 pandemic, and even in good economic conditions these spaces are often uneconomic for mixed-use building owners. In order to offset costs of providing these spaces and not further increase market-rate rents, particularly in residential buildings, the City should provide incentives for small format retail spaces. In addition, provision of such spaces should be targeted for specific street frontages where they will have the foot traffic to support them. Otherwise, this policy could add cost and only result in vacant ground-level space at odds with the vibrant neighborhood the City wants to create.
New UD-7	Allow adjacent development to provide upper-story or podium connections to Eastrail where there is significant elevation difference between Eastrail and adjacent properties.	Allow <u>Encourage</u> adjacent development to provide upper-story or podium connections to Eastrail where there is significant elevation difference between Eastrail and adjacent properties.	We strongly support this policy generally, but the City should go farther to specifically encourage trail connections that will activate this amenity and further define it as a regional destination. The subject property is immediately adjacent to light rail and would be a great candidate for a direct connection, pending permission from the Eastrail owner.
<u>New UD-10</u>		<u>Recognize that sites smaller than 40,000 square feet have unique development constraints and provide flexibility in development standards to ensure they can be developed to meet the Wilburton Vision.</u>	This would be an additional new Comprehensive Plan policy. Like in Downtown Bellevue, most sites in Wilburton are large. However, there are small sites like this one (17,000 sf) that present signature development opportunities if the City provides flexibility in development standards like FAR, setbacks, and floorplates to ensure development is feasible. The owners want to ensure the site could be redeveloped to provide a highrise residential option steps from light rail with activating lower-level retail on Eastrail.

			Flexibility is key to ensure development of small sites can occur. The zoning code in Downtown provides flexibility for small sites, and this model should be replicated in Wilburton.
--	--	--	--

Please do not hesitate to reach out to me if you have any follow-up questions.

All the best,

Abbey

Abigail Pearl DeWeese

Hillis Clark Martin & Peterson P.S.

999 Third Avenue | Suite 4600 | Seattle, WA 98104
d: **206.470.7651** | 206.623.1745 | f: 206.623.7789
abigail.pearl@hcmp.com | www.hcmp.com | vCard | view my bio

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Johnson, Thara

From: Jacquie Quarre <jacquie@tharsis.land>
Sent: Wednesday, July 26, 2023 12:45 PM
To: PlanningCommission
Cc: Johnson, Thara; Shull, Janet; Panganiban, Justin
Subject: Suggestion on draft LU-1 for 7/26 Planning Commission Meeting

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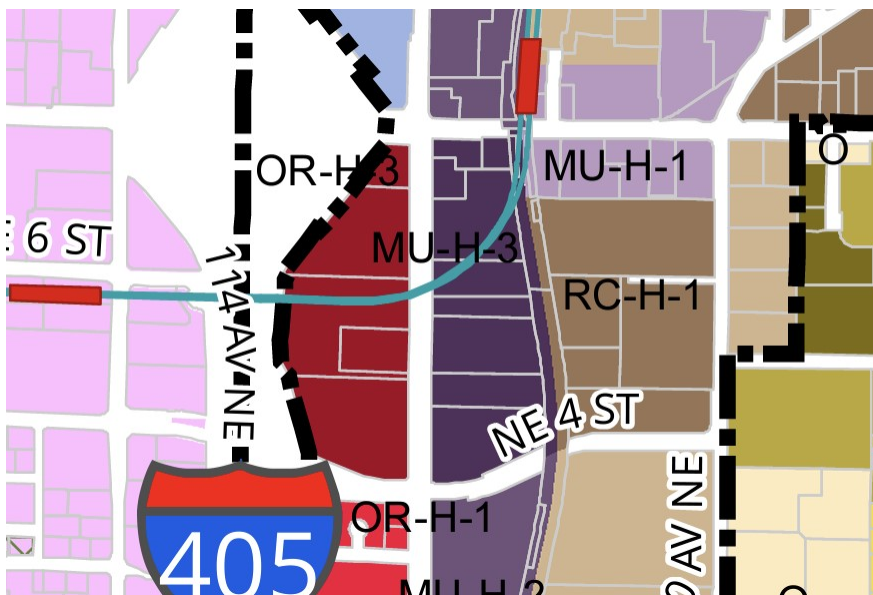
Dear Planning Commission,

Thank you for your hard work on the land use policy updates. We represent Beta-Bellevue Auto Center, L.L.C., who owns the property located at 620-638 116th Ave NE, which is located approximately 500 feet from the Sound Transit Wilburton Station. The DEIS and preferred alternative study a MU-H-3 land use classification for the Beta-Bellevue property, which has the tallest height limits for the MU classification.

We reviewed the draft land use policies being presented at tonight's meeting and want to suggest a clarification for the draft new LU-1, which currently reads: *"Allow for the tallest buildings closest to Downtown and along Interstate 405, transitioning down in height toward the east."*

Based on the heights studied in the DEIS and preferred alternative, it is important to clarify in LU-1 that the area of the tallest buildings will include the portion of 116th where the Beta-Bellevue property is located. We suggest amending LU-1 to read: *"Allow for the tallest buildings closest to Downtown, ~~and~~ along Interstate 405, and on 116th Ave NE between NE 4th Street and NE 8th Street, transitioning down in height toward the east."*

This language captures the H-3 height limit that the City is planning for along 116th Ave between NE 4th and NE 8th, which is shown below (snapshot taken from the preferred alternative land use map):



Thank you for your consideration of this change, and please let us know if you have any questions.

Jacquie

Jacque Quarré
Tharsis Law P.S.
jacque@tharsis.land
Direct/cell: 425-891-7842

Johnson, Thara

From: Neal Mulnick <neal@clover.capital>
Sent: Wednesday, July 26, 2023 12:45 PM
To: PlanningCommission
Cc: Shull, Janet; Panganiban, Justin
Subject: Wilburton Vision Implementation – 7/26 Draft CPA Comments

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Re: Wilburton Vision Implementation – 7/26 Draft CPA Comments

Dear Chair Ferris and Planning Commissioners,

We are the owners of the Ford AutoNation Site at 411 116th Avenue NE and are writing to provide comment on the City's proposed draft Comprehensive Plan Amendments (CPAs) for the Wilburton Vision Implementation that are on tonight's meeting agenda. The land use policies under consideration begin to set a framework for a dense, multi-modal, and mixed-use future neighborhood that will ultimately be realized through the development standards. On the whole, we support the high-level policies, especially New LU-1 that places the tallest heights closest to Downtown and I-405, but have a few suggestions to refine the policies so that they don't unduly constrain future regulations or delay development.

New LU-5 states "Develop compact, mixed-use site and neighborhood configurations that support active transportation." Although we support this policy, we are concerned future regulations to achieve "compact" development will rely on prescriptive street and through-block connections, and floorplate limits that will severely constrain development sites. These regulations have posed challenging and in some cases hindered development Downtown and in Bel-Red. Floorplate sizes that are efficient (rather than overly prescriptive) and tailored to the use should also be incorporated. To ensure lessons learned, including the need for flexibility, are incorporated into future development standards we recommend the following revisions: "Encourage efficient, mixed-use site and neighborhood configurations that support active transportation through flexible site planning standards and incentives for pedestrian and multi-modal connections."

New IMP-4 appears related to New LU-5 and states "Encourage early planning and coordination between adjacent properties to ensure consistent improvements between development sites." We have concerns about how this will be implemented, and believe the City should take an active role if it wants to see consistency in the look and feel of improvements by setting clear and objective design guidelines. Coordination between adjacent properties can be difficult for a host of reasons, and as properties develop incrementally they must respond to the site conditions that exist at the time of development. Although the policy references "encourage," we're concerned this will essentially become an expectation, and requiring coordination between owners will slow down the development process. We would recommend deleting this policy.

Thank you for this opportunity to comment, and we look forward to continuing to engage with you and staff throughout the CPA process for Wilburton.

Sincerely,
Neal Mulnick

--

Neal Mulnick

Clover Capital LLC

Cell: 253-973-7770 | Office: 425-746-1500 | neal@clover.capital | VisitClover.com

14510 NE 20th Street - Suite 205, Bellevue, WA 98007



Johnson, Thara

From: Jodie Alberts <jodie@bellevuechamber.org>
Sent: Wednesday, July 26, 2023 4:08 PM
To: PlanningCommission
Cc: Jessica Clawson; Joe Fain
Subject: PLUSH Written Comments - Wilburton CPA

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Members of the Planning Commission,

Thank you for your continued work on the Wilburton Vision Implementation CPA. Below are comments that we would like to submit on behalf of the Chamber's PLUSH Committee.

Recommendations for Wilburton CPA:

- New LU-4 states "Right-size vehicle and bicycle parking supply and requirements to reflect trail and transit proximity and access." As noted in our DEIS letter, the City should remove minimum parking requirements for sites proximate to light rail. This policy should go beyond "right-sizing" to acknowledge "elimination" of minimum vehicle parking requirements is appropriate within 1/4 a mile of light rail stations.
- New LU-5 states "Develop compact, mixed use site and neighborhood configurations that support active transportation." Developing "compact" sites affect street grid and max block size that would hinder development of larger parcels in the subarea. We request this instead state: "Development mixed use site and neighborhood configurations that support active transportation."
- The Housing Policy Goal is "To expand diverse housing across unit types and affordability levels." We're concerned this goal does not go far enough to recognize the need for new housing in Bellevue, and it should specifically recognize the City's goal to encourage housing in Wilburton to help meet the City's overall housing demand. We'd recommend revising to: "To expand diverse housing across unit types and affordability levels at a rate of production that consistently helps Bellevue achieve its housing demand."
- S-WI-22 states "Cultivate mixed-income communities that integrate market rate development with subsidized affordable and 'workforce' housing through regulatory and incentive approaches." The City is studying both regulatory and incentive approaches in the FEIS and direction on including both approaches (or one or the other) should not be provided until the FEIS is completed and decision-makers can be informed by the data in the study. In general, we support incentive approaches over regulations that risk slowing the velocity of housing production, and we encourage you to table and revisit this policy after the FEIS is published.
- IMP-1 states "Develop 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." This is a reasonable policy, but it must also recognize that none of the listed public benefits will be achieved if they are not calibrated properly to encourage overall redevelopment to occur. We recommend the City add as a second sentence: "Right-size development contributions to account for all development costs to ensure redevelopment can occur to support the Wilburton TOD Vision and Goals."

Thank you for the opportunity to comment and for bringing your attention to this matter. We look forward to continuing this important work alongside the Commission and the City.

Warm regards,
Jodie

Jodie (Chavez) Alberts | Vice President of Government Affairs

Bellevue Chamber of Commerce

M: 901.834.4261 | O: 425.213.1206 | E: jodie@bellevuechamber.org

330 112th Ave. NE, Suite 100, Bellevue, WA 98004



Johnson, Thara

From: phyllisjwhite@comcast.net
Sent: Wednesday, July 26, 2023 3:57 PM
To: Bhargava, Vishal; Khanloo, Negin; PlanningCommission; Brown, Karol; Cuellar-Calad, Luisa; Goepppele, Craighton; Malakoutian, Mohammad; Robertson, Jennifer S.
Cc: Council
Subject: Tree Canopies, Wilburton Vision Implementation and the Wilburton Comp Plan

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Dear Bellevue Planning Commissioners,

Thank you for the opportunity to present our public comments. My name is Phyllis White, and I am a resident of Wilburton. I am speaking on behalf of many of my Wilburton neighbors and residents and share our concerns for the preservation of our mature tree canopies and the continued protection of the health of the riparian corridors, streams, and the ecological sustainability of the natural critical areas running through our neighborhood. We request that you consider the preservation of our neighborhood trees essential for the sensitive ecological environment supporting the endangered aquatic species and priority species land animals living in and along the Kelsey creek tributaries in our neighborhood. Currently, we have 39% tree canopies in our neighborhood. This is essential to preserve for the well-being of our community.

Our neighbors submitted numerous letters. The Wilburton neighborhood includes the subareas around the Wilburton Vision Implementation and as far as the BelRed development a few blocks away from the Evergreen Village along 140th Ave NE. We have wetlands, marshes, tributaries, and century old trees and streams that are frequently showing signs of increasing pollution, foam and murky water.

We appreciate your consideration and all of your hard work.

Respectfully,

Phyllis White
Wilburton Resident

From: [Barb Braun](#)
To: [Johnson, Thara](#); [King, Emil A.](#); [Kattermann, Michael](#); [Robinson, Lynne](#); [Council](#); [PlanningCommission](#); [parkboard](#)
Subject: How to Cool Down a City
Date: Wednesday, September 20, 2023 9:11:20 AM

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Some wonderful urban design tips that Bellevue should consider working into Comp Plan polices, especially for Wilburton/Bel-Red. Since Bellevue wants to be a model city, these ideas should be seriously considered. Thank you. Barb Braun

How to Cool Down a City
New York Times
By Pablo Robles, Josh Holder and Jeremy White
Sept. 18, 2023

<https://www.nytimes.com/interactive/2023/09/18/world/asia/singapore-heat.html>

From: [Shull, Janet](#)
To: [John Darvish](#); [King, Emil A.](#)
Cc: [PlanningCommission](#); [Robinson, Lynne](#); [Council](#); [Pat Mutzel/ Mutzel](#)
Subject: RE: Wilburton - BR-MO-H-2 alternatives
Date: Tuesday, November 7, 2023 10:52:34 AM

Dear John,

Thank you for sharing your experience, insights, and proposed alternatives with us. If OK with you, I would like to share this information with our project team for consideration.

We will be sure to reach out with any questions. We also welcome additional input as we move forward with implementing the Wilburton Vision.

Best Regards,

-Janet Shull

Janet B. Shull, AICP CUD

Strategic Planning Manager
Community Development, City of Bellevue
jshull@bellevuewa.gov | 425-452-5371 | BellevueWA.gov

From: John Darvish <jdarvish@holistique.com>
Sent: Tuesday, November 7, 2023 7:08 AM
To: King, Emil A. <EAKing@bellevuewa.gov>; Shull, Janet <JShull@bellevuewa.gov>
Cc: PlanningCommission <PlanningCommission@bellevuewa.gov>; Robinson, Lynne <LRobinson@bellevuewa.gov>; Council <Council@bellevuewa.gov>; Pat Mutzel/ Mutzel <pat.mutzel@cushwake.com>
Subject: Wilburton - BR-MO-H-2 alternatives

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Dear Emil and Janet,

Thank you for meeting with Pat Mutzel and I on October 16th. We appreciate your time and care you have given to the latest Wilburton Rezone.

Attached are six alternatives we are proposing to this specific area of in Wilburton, BR-MO-H-2. We believe these alternatives will invigorate this area of Bellevue which has not seen any new development in 40 years despite being a prominent location. With its proximity to light rail station it even becomes more important that we get this zoning correct and inspire new developments.

Please let me know if you have any questions or I can be of assistance.

Warm regards,

John Darvish

From: [Pat Mutzel/USA](#)
To: [John Darvish](#); [King, Emil A.](#); [Shull, Janet](#)
Cc: [PlanningCommission](#); [Robinson, Lynne](#); [Council](#)
Subject: RE: Wilburton - BR-MO-H-2 alternatives
Date: Tuesday, November 7, 2023 11:53:03 AM
Attachments: [image001.png](#)

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As a follow up to Johns email and our submittal, my quick high level observations are as follows:

- The BR-MO-1 zoning has been in place for some time. It has not produced any significant re-developments to date or since its inception.
- Changing the FAR and heights alone in this area won't be a catalyst for further development or urbanization of transit-oriented uses.
- Multifamily mixed use projects have been the single biggest catalyst for new development and urbanization across the country (locally, Columbia City, SeaTac and other major stops along the Seattle based stations have seen this happen or is currently happening).
- Promoting mixed use projects near the rail station will bring in more low to middle class workers which should support affordable housing goals.
- A number of the multifamily zoned parcels within the current preferred alternative already have substantial development or are potentially rendered "not developable". Examples are: Auto Nation, Home Depot & Best Buy, Total Wine, Whole Foods, Dave and Busters, Home Goods/Trader Joes, Design Market (strip retail center north of Whole Foods). All these properties are either super strategic corporate locations with long term leases or the value of the income (either to land owner if leased or corporate revenue sales of the store) out ways what a developer would be willing to pay for the land. This dramatically reduces the overall goal of improving the study area amenities and incentivizing transit oriented uses.
- The properties within the current BR-MO-1 and potentially future BR-MO-H-2 area are made up of smaller older medical buildings. They also have proximity to the Wilburton Station. These parcels all have lower rents and the land value to income value makes them immediately developable in the near term. The tenants within this subarea can easy move north along 116th or into select areas within the Bel-Red corridor making for an easy transition. Try to displace large box retailers and dealerships makes for a more problematic transition, plus some serve a local need. I like my home depot right where it is .

Great to meet with you Emil and Janet. Thanks for hearing out our opinions on the topic.

Best,

-Pat

Pat Mutzel

Senior Director
Capital Markets

Cushman & Wakefield

Direct: +1 206 521 9225
Mobile: +1 425 466 8567
pat.mutzel@cushwake.com



11235 SE 6th Street, Suite 200
Bellevue, WA 98004 | USA
cushmanwakefield.com

From: John Darvish <jdarvish@holistique.com>
Sent: Tuesday, November 7, 2023 7:08 AM
To: Emil King <eaking@bellevuewa.gov>; Janet Shull <JShull@bellevuewa.gov>
Cc: PlanningCommission@bellevuewa.gov; Lynne Robinson <LRobinson@bellevuewa.gov>; Council@bellevuewa.gov; Pat Mutzel/USA <Pat.Mutzel@cushwake.com>
Subject: Wilburton - BR-MO-H-2 alternatives

External Mail

Dear Emil and Janet,

Thank you for meeting with Pat Mutzel and I on October 16th. We appreciate your time and care you have given to the latest Wilburton Rezone.

Attached are six alternatives we are proposing to this specific area of in Wilburton, BR-MO-H-2. We believe these alternatives will invigorate this area of Bellevue which has not seen any new development in 40 years despite being a prominent location. With its proximity to light rail station it even becomes more important that we get this zoning correct and inspire new developments.

Please let me know if you have any questions or I can be of assistance.

Warm regards,

John Darvish

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From: [John Darvish](#)
To: [Shull, Janet](#)
Cc: [King, Emil A.](#); [PlanningCommission](#); [Robinson, Lynne](#); [Council](#); [Pat Mutzel/ Mutzel](#)
Subject: Re: Wilburton - BR-MO-H-2 alternatives
Date: Tuesday, November 7, 2023 12:00:57 PM

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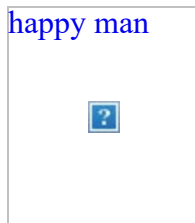
Hi Janet,

Thank you for your response and consideration. I am humbled to hear that you would like to share these alternatives with your team. Please feel free to share with anyone who you think can benefit from these insights. If I can be any assistance please let me know.

I also believe that Pat Mutzel, shared valuable insight in a separate email which comes from his years of experience in commercial real estate.

Warm regards.

John



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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On Nov 7, 2023, at 10:52 AM, Shull, Janet <JShull@bellevuewa.gov> wrote:

Dear John,

Thank you for sharing your experience, insights, and proposed alternatives with us. If OK with you, I would like to share this information with our project team for

consideration.

We will be sure to reach out with any questions. We also welcome additional input as we move forward with implementing the Wilburton Vision.

Best Regards,

-Janet Shull

Janet B. Shull, AICP CUD

Strategic Planning Manager
Community Development, City of Bellevue
jshull@bellevuewa.gov | 425-452-5371 | BellevueWA.gov

From: John Darvish <jdarvish@holistique.com>
Sent: Tuesday, November 7, 2023 7:08 AM
To: King, Emil A. <EAKing@bellevuewa.gov>; Shull, Janet <JShull@bellevuewa.gov>
Cc: PlanningCommission <PlanningCommission@bellevuewa.gov>; Robinson, Lynne <LRobinson@bellevuewa.gov>; Council <Council@bellevuewa.gov>; Pat Mutzel/
Mutzel <pat.mutzel@cushwake.com>
Subject: Wilburton - BR-MO-H-2 alternatives

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Dear Emil and Janet,

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Attached are six alternatives we are proposing to this specific area of in Wilburton, BR-MO-H-2. We believe these alternatives will invigorate this area of Bellevue which has not seen any new development in 40 years despite being a prominent location. With its proximity to light rail station it even becomes more important that we get this zoning correct and inspire new developments.

Please let me know if you have any questions or I can be of assistance.

Warm regards,

John Darvish

From: [Ming Zhang](#)
To: [PlanningCommission](#)
Cc: [King, Emil A.](#)
Subject: Future zoning changes for certain areas in Bellevue
Date: Sunday, November 5, 2023 9:42:18 PM

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Dear Planning Commissioners,

My name is Ming Zhang. I am the founder of MZA Architecture in Bellevue. I have worked in Bellevue since 1996. I also participated in the Downtown livability as well as some other city's up zoning exercises.

Considering the city is an urgent need and challenges to build much more residential units as well as affordable living, I really encourage you to take advantage of some existing low density commercial areas to up zoned into higher density mixed-use zoning with residential components. For example, my understanding is that in your up zoning comprehensive plan, the low density office zoning along 112th Ave NE, north of NE 8th St. will still remain fairly low density and pure office zoning. Also the 116th Ave NE north of NE 8th St. may increase to higher density, but still remain medical office zoning. I truly believe these two areas shall be high density Mixed-use zoning with substantially residential components, since they are very close to downtown, on major city roads, and easy access to freeway and light rail, not to mention the pure office space needs have been tremendously reduced after COVID-19.

Please take consideration of this suggestion at your next level comprehensive planning refinement.

Thanks and let me know if there is anything my firm and I can help.

Sincerely,

Ming Zhang, FAIA
CEO
MZA Architecture

Sent from [Mail](#) for Windows

From: [John Darvish](#)
To: [King, Emil A.](#); [Shull, Janet](#)
Cc: [PlanningCommission](#); [Robinson, Lynne](#); [Council](#); [Pat Mutzel/ Mutzel](#)
Subject: Wilburton - BR-MO-H-2 alternatives
Date: Tuesday, November 7, 2023 7:10:47 AM
Attachments: [Proposed Guidance Changes.pdf](#)
[ATT00001.htm](#)

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Dear Emil and Janet,

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Please let me know if you have any questions or I can be of assistance.

Warm regards,

John Darvish

Emil King
Planning Director
Community Development Department
City of Bellevue, WA
EAKing@bellevuewa.gov

Janet Shull, AICP CUB
Strategic Planning Manager
City of Bellevue, WA
JShull@bellevuewa.gov

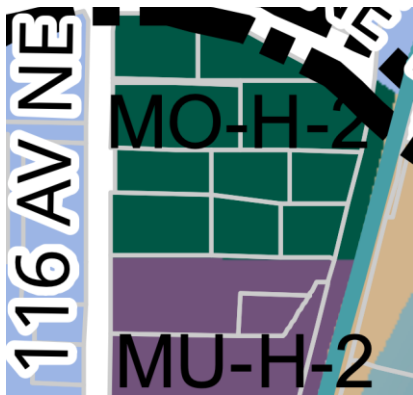
Dear Emil and Janet,

Thank you for meeting with Pat Mutzel and I on Monday, October 16. We appreciate your time and letting us understand your reasoning for designation of BR-MO-H-2 for this area of Wilburton.

We believe the alternatives we have listed here will better suit long term goals of Bellevue. But first a few background points and observations.

Background and Observations

- 1- The area of interest is bound by Bel-Red Rd to the north, 116th Ave NE to the west, Overlake parking Ramp to the south, and Lake Bellevue on the east. It is marked green and nicknamed BR-MO-H-2, please see the map below.



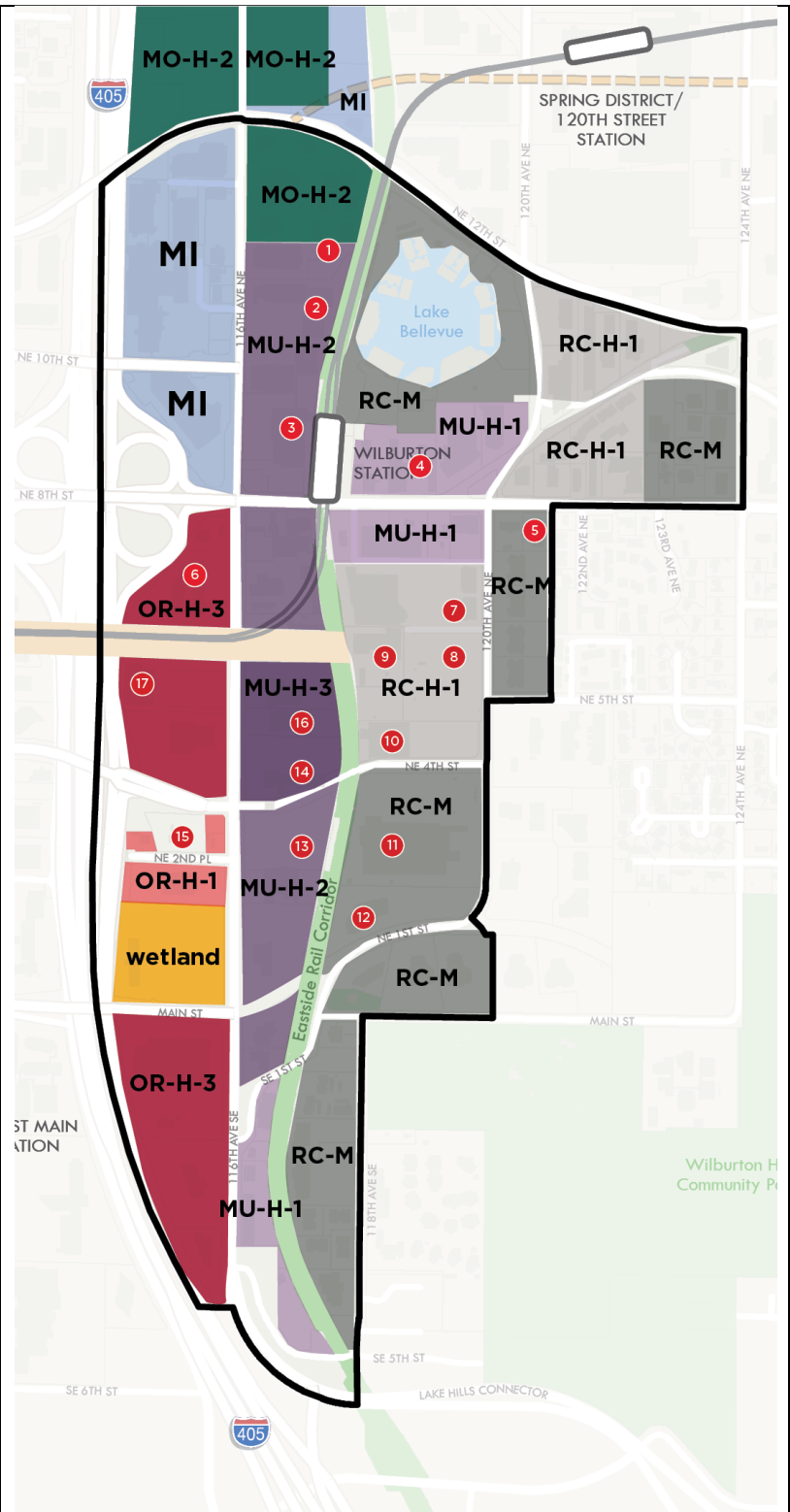
- 2- This area consists of 10 properties that together make up roughly 325,000 SQFT, with about 119,000 SQFT improvements. All of the buildings date back to 1950-1980. There are consistent vacancies which fall outside of this area and are within the Overlake Hospital, across the street in the Pavillion. The main reason for these vacancies is high cost of occupancy due to unreasonable leases forcing medical practices to opt for less expensive options or move outside of the designated medical area in Bellevue.
- 3- Historically this area has been designated Medical Office all the way from NE 8th Street to Bel-Red- Road for as long as I can remember, 30+ years? Even with the latest bump during the last Bel-Red re-zone, increasing the FAR to 4 and height to 150 feet, still no new development has taken place in this area for 40 years.
- 4- With the arrival of Light Rail and the need for more housing this area is particularly attractive for Transit Oriented Development (TOD) and street level retail.
- 5- The area north of Bel-Red Road is still available and well-suited for medical office development. The proximity to Children's Hospital is a catalyst for further medical development.
- 6- Overlake Hospital still has land available on its campus for future large medical office development if the need arises.

- 7- With the new proposed FAR between 5-6 and increased height of 250 feet, over 1,630,000-1,950,000 SQFT of new medical space can be developed in area of interest alone.
- 8- We estimate the total need for a new medical office for the next 20-30 years not to exceed 500,000 SQFT, which is between one third to one fourth of the potential for the proposed vision.
- 9- A purely medical office building bears too much risk to develop given the lack of foreseeable need, cost of new buildings, and prohibitive lease rates for medical tenants. Any new medical building will be purely speculative. Therefore, diversification of tenants mitigates such risks.
- 10- Most of the properties within the Wilburton Preferred Alternative subarea that lie to the south of the MO-H-2 zoning designation have a residential component to them but realistically aren't going to be redeveloped due to the current improvements. Some have already been developed and others generate too much income for a developer and owner to find common ground on land value. (see exhibit A for reference)
- 11- The MO-H-2 zoned area has the highest concentration of small parcel/single owners and is the closest near-term developable area given the vintage of the buildings coupled with smaller non corporate tenants. Its proximity to the light rail station makes this area perfect for residential and meets the needs for living and urbanization, which is the main goal of the Initiative.
- 12- Properties in Wilburton area will not yield any immediate development due to its current mix of tenants and property owners. Please see Exhibit A.

Exhibit A, Existing Zoning

Properties Rendered Not Developable within the next 20 years:

1. Parking Garage & Surface Parking
2. Design Market Retail Center
3. Whole Foods
4. Auto Nation (Porsche & Mercedes)
5. Park 120 Office Building
6. Hotel One Six (former Coast Hotel)
7. Uwajimaya Market & Total Wine
8. Bellevue School Bus Parking
9. Mutual Materials (could possibly be developed)
10. Best Buy & Parking
11. Home Depot
12. Ridgewood Corporate Center (possible)
13. Dave N Busters, Target, etc. (KG Investments)
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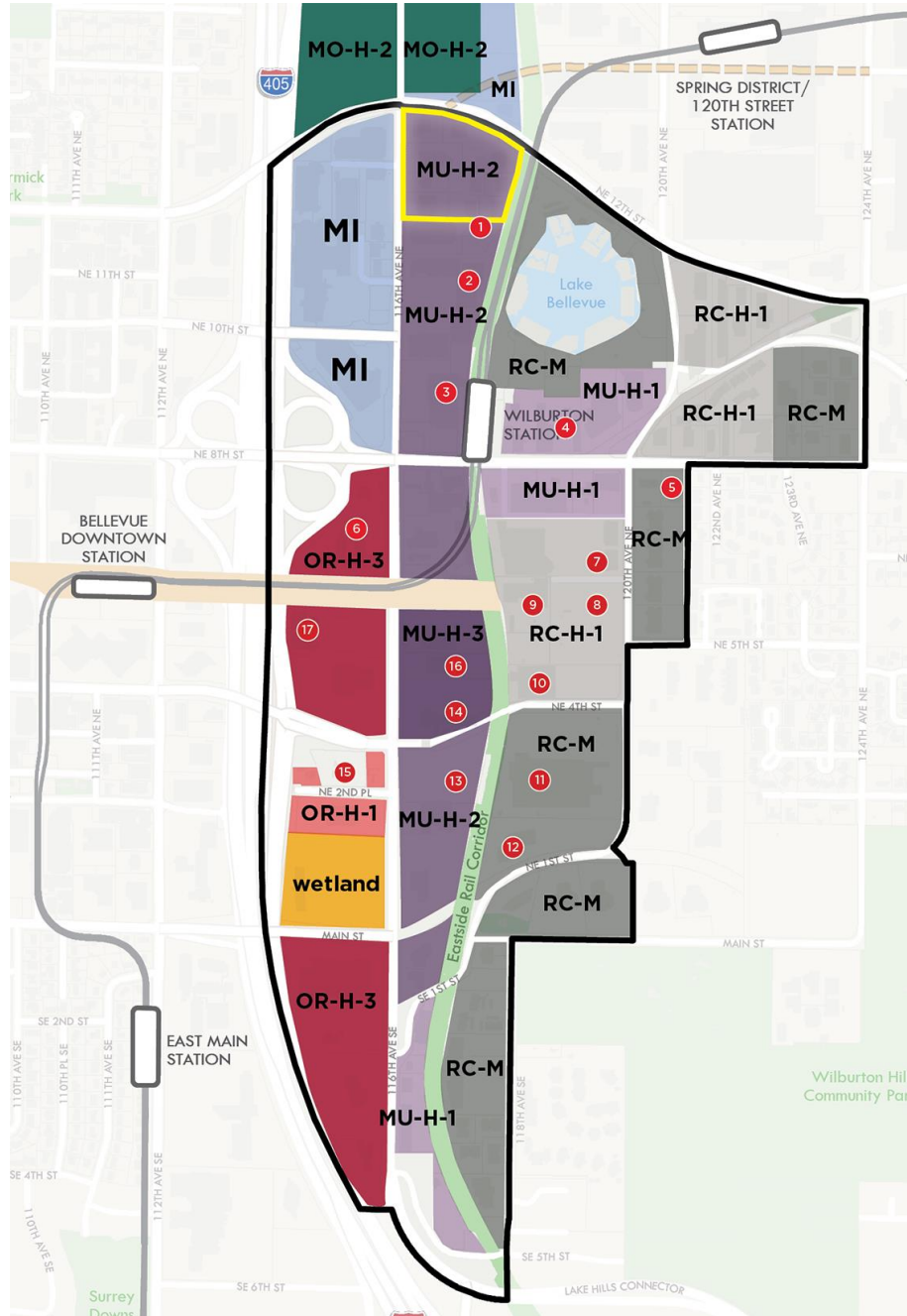
Recommended Alternatives to Current Suggested Zoning

We are recommending these six alternatives to remedy the shortcomings in the current plan. Obviously, they can be combined or acted upon solely depending on your judgement. We further believe that all the suggested alternatives are easy to implement and are not radically different than what has already been proposed or historically implemented. Nevertheless, implementing one or more of the alternatives will further enhance and improve the current plan. Given the current fluidity of the vision document and its support for urbanizing the rezone goals, we believe the alternatives should be given earnest consideration. Please see Exhibit B, below with illustrations.

Exhibit B, Zoning Recommendations

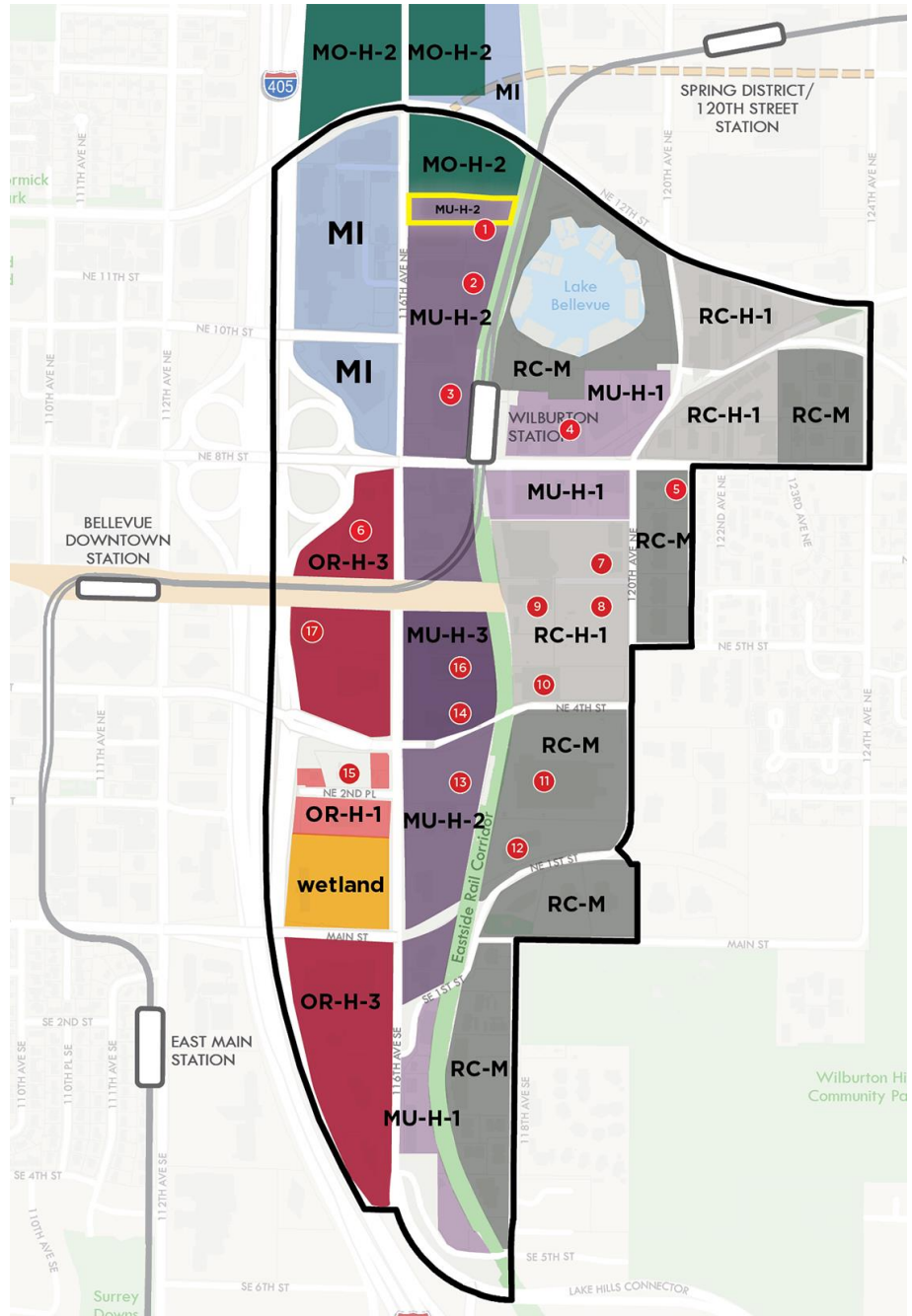
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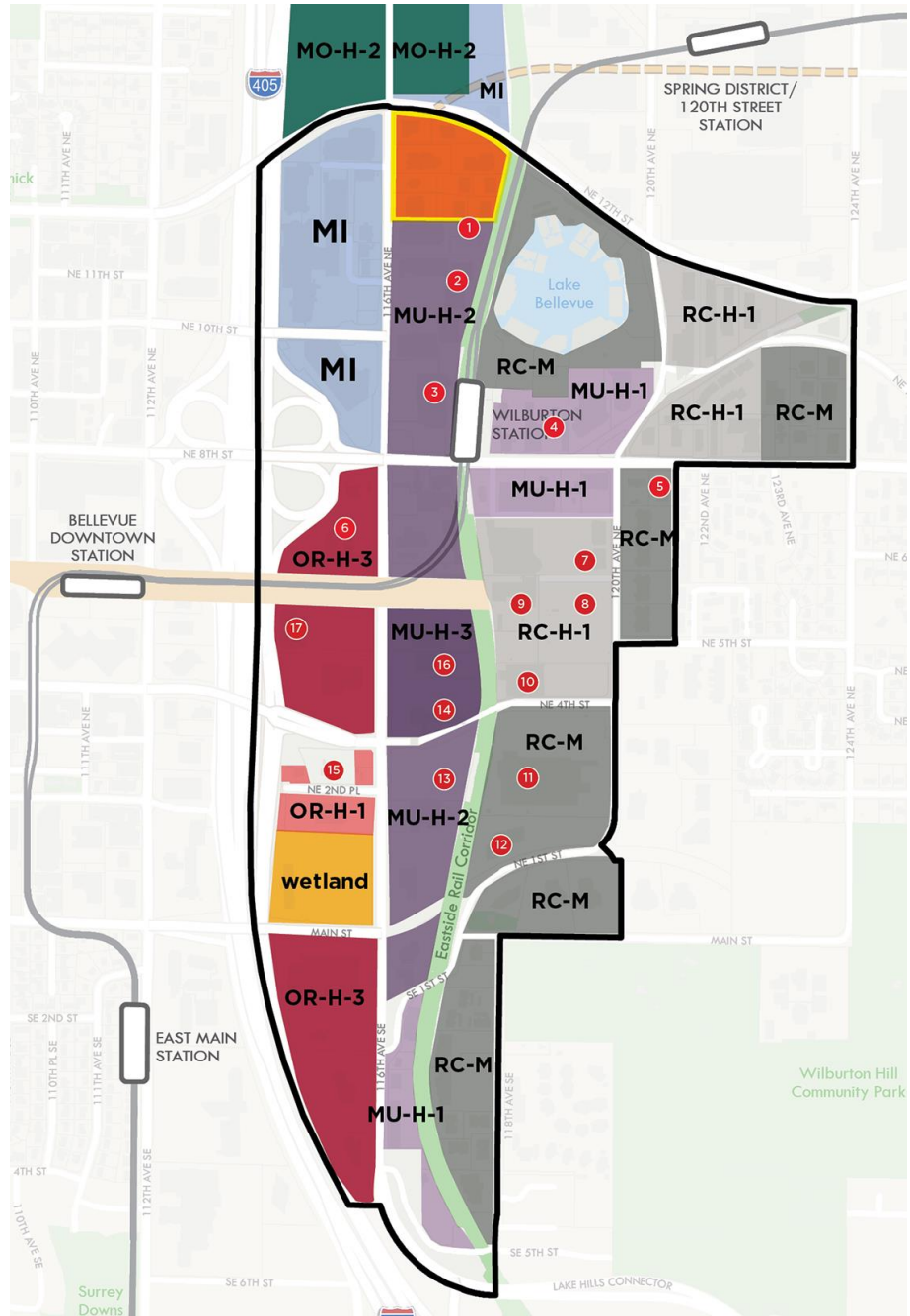
Recommendation 2

Extend BR-MU-H-2 slightly north ward to expand Mixed-Use area. Considering the actual need for medical office is 1/3 to 1/4 of what is envisioned, adjusting this will correspond with the realistic need for medical office. How far north we leave to the discretion of the staff.



Recommendation 3

Like the downtown Bellevue zoning code, have a bifurcation in the zone that stipulates what is a nonresidential FAR max and residential FAR max. Incentivize medical office with a higher max FAR of 6 but allow for residential at something a little less, if blended let developers get to something in the middle.



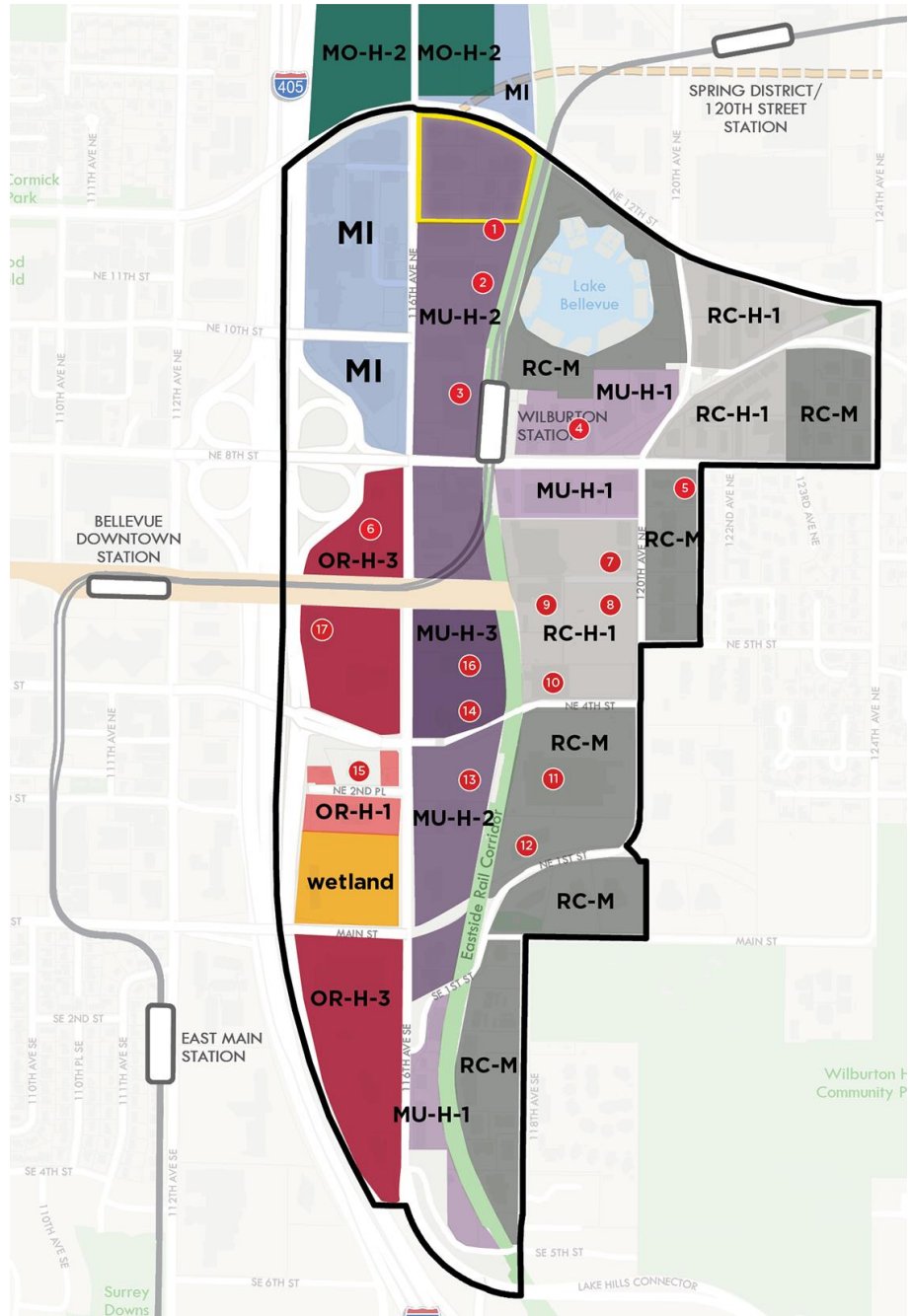
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Recommendation 5

Make everything north of NE 8th to NE Bel-Red Road BR-MU-H-2 or BR-MO-H-2 with a minimum of 10% dedicated to medical uses. This area, NE 8th Street to Bel-Red Rd., has historically been zoned as Medical Office in the past few rezones. Therefore, keeping the zoning intact for the entire area is nothing new and no precedence is broken. This is a slight variation on Alternative 1.



Recommendation 6

Allow Medical use only in BR-MO-H2. Prohibit medical use in all proposed BR-MU-H-1/2/3, RC-H-2, RC-M, OR-H-1/2/3 areas. If Medical use is allowed in these zones, it will further dilute the need for medical need in the proposed BR-MO-H-2.

MAX CAPITAL LLC & ALCO INVESTMENT CO
14510 NE 20TH STREET – SUITE 205
BELLEVUE, WA 98007

February 16, 2024

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

And to: Janet Shull, ACIP CUD Initiative Lead
City of Bellevue

Via email to PlanningCommission@bellevuewa.gov and WilburtonVision@bellevuewa.gov

Re: Draft Wilburton Vision Implementation Subarea Plan Policies

Dear Chair Bhargava and Ms. Shull,

We represent the ownership of the nearly 4.5-acre AutoNation Ford site located at 411 116th Avenue NE within the Wilburton TOD Area. We have been following the Wilburton Vision Implementation Subarea Plan process closely, and are writing to offer a few comments on the Draft Subarea Plan Policies with our site and the City's overall vision for the neighborhood in mind.

On the whole, we support and applaud the City's direction to add development capacity in the Wilburton TOD Area to accommodate growth and complement Downtown. We particularly support the strategy to locate the highest density zoning along I-405 closest to Downtown (as stated in S-WI-33). This strategy will encourage development that is of a scale complementary to Downtown and be a visually stunning introduction to Bellevue for travelers from I-405. We do, however, have a few detailed comments on specific proposed Goals and Policies, as follows:

- **Parks, Recreation, and Open Space Goal:** We support the goal to “provide for a variety of public community recreation and gathering spaces” articulated in the Parks, Recreation, and Open Space Goal, and believe that private development can play a role in developing a parks network through *incentives* as part of the development process. We are deeply concerned, however, with the map that is proposed to accompany the Goal as it shows large swaths of the Wilburton TOD Area, including our site, proposed for public parks. In order for the City to achieve its vision for the Wilburton TOD area, much of the area depicted for potential parks must be developed. To confirm development can occur, the City should provide additional language in the Subarea Plan to accompany this map to note that it is “for illustrative purposes only and shall not be used to condition individual development projects.” To provide similar clarity, we also recommend revising S-WI-59 regarding a “centrally located public space as part of the Grand Connection” to state specifically the public space will be located on the City's existing Lincoln Center property at 515 116th Avenue NE.

- S-WI-48: This policy encourages aesthetic and functional improvements to Sturtevant Creek. There is a portion of Sturtevant Creek that flows nearby our site, but is within WSDOT’s “limited access highway” jurisdiction associated with I-405 and will not be possible for any private development to improve. The City’s policies should recognize its jurisdictional limits on any improvements to specific sections of the Creek. A possible revision could be: “Encourage improvements that enhance the aesthetic and functional qualities of natural features, such as Sturtevant Creek, Lake Bellevue, and the wetland at 116th Avenue NE and Main Street, to the extent feasible and within the City’s permitting jurisdiction.”
- S-WI-57: This policy encourages through-block connections. We agree that through-block connections can be powerful public amenities, but the policy should also recognize that these spaces must be incentivized in private development to offset the high costs of implementation. We recommend modifying the text of the policy to read: “Enhance active transportation and through-block connections through development incentives with landscaping and amenities to serve as linear open spaces.” The City should also allow flexibility for developments to deliver through-block connections creatively through both internal to building and exterior spaces in the land use code.
- S-WI-65: This policy requires “publicly accessible internal access corridors” through development review. Requirements for publicly accessible space in development review must meet state and federal constitutional limits that require a nexus and proportionality to the impacts of the specific new development. It is a best practice for the City’s policies to recognize this limitation. We recommend revising the policy to: “Require publicly accessible internal access corridors to facilitate mobility and livability through development review to the extent consistent with law.”
- S-WI-91: This policy encourages “early planning and coordination between adjacent properties.” Although this is a good sentiment, we are concerned with how this would be implemented in the land use code or entitlement process. The City should avoid any *requirements* for developers to work together as any such requirements will add time, cost, and uncertainty to the development process and would significantly delay the delivery of any development at scale in the Wilburton TOD Area.
- S-WI-13: This policy encourages multifamily development to provide adequate play areas and amenities for families. We support this sentiment, but to the extent this policy could apply to the TOD Area, we recommend the City and Planning Commission also recognize that “adequate play areas” must be viewed in the context of the urban setting the City hopes to create, and therefore, recommend the addition of “appropriate for an urban context” at the end of the policy. Individual children’s play areas, paths, interpretive features, and splash pads could achieve this goal; however, the City should not rely on the multifamily children’s play area requirement in current land use code for the Wilburton TOD Area as the requirement is better suited to suburban development.

Thank you for your consideration of these comments, and for your work on the Wilburton Vision Implementation and dedication on behalf of the City. Please do not hesitate to let us know if we can answer any additional questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'NM', with a small dot above the second 'M'.

Neal Mulnick

Cc: Emil King, City of Bellevue
Abigail DeWeese, HCMP

From: [John Darvish](#)
To: [Khanloo, Negin](#)
Cc: [PlanningCommission](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 11:32:35 AM

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Dear Negin,

Thank you for your help. As always I feel indebted to you. This is a letter that I sent to all the planning commissioners and plan to send to council members.

Any feedback will be immensely helpful.

Thank you,

John

Dear Commissioner Khanloo,

My name is John Darvish and my wife, Dr. Nooshin Darvish, and I have been a property and business owner in the Wilburton area of Bellevue since 2002. We have owned and operated Holistique Medical Center since 2002. Also, we currently own 1200 116th Ave NE, Bellevue.

I would like to share with you our displeasure with the designation of BR-MO-H2 for the area that is directly across 116th Ave NE from Overlake hospital. We strongly believe it should be zoned BR-MU-H2. I have attached a short explanation with self-explanatory maps why BR-MU-H2 is the correct zoning for this area and why we will miss an opportunity for renewing this area which is now served by light rail and can play a critical role in renewing the neighborhood.

I have followed the the rezone effort since its inception and have been in communication with Emil King and Janet Shull. I have shared with them our vision on several occasions. Even though they think it is good idea, they have not however changed the zoning for this area. And have not received any feedback, directly or indirectly.

I would like to thank you in advance for your attention to this critical issue and welcome an opportunity to meet and discuss any questions you might have.

Sincerely,

John Darvish

John Darvish
CFO
Holistique Medical Center
Desk: 206-321-2202 Fax: 425-462-8919

happy man

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jderwish@holistique.com

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From: [John Darvish](#)
To: [Goeppele, Craighton](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 4:05:54 PM
Attachments: [Two-Alternatives-For-BR-MO-H2.pdf](#)
[ATT00001.htm](#)

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I have followed the the rezone effort since its inception and have been in communication with Emil King and Janet Shull. I have shared with them our vision on several occasions. Even though they think it is good idea, they have not however changed the zoning for this area. And have not received any feedback, directly or indirectly.

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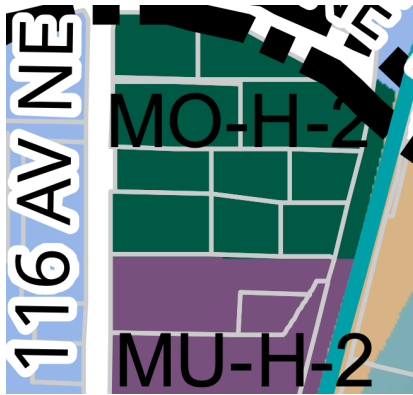
Sincerely,

John Darvish

Two Alternatives for the Proposed Wilburton Area BR-MO-H2

Background and Observations

The area of interest is bound by Bel-Red Rd to the north, 116th Ave NE to the west, Overlake parking Ramp to the south, and Lake Bellevue on the east. It is marked green and nicknamed BR-MO-H2, please see the map below.



In all the alternatives (Alternative 0-Alternative 3) listed in the latest proposal by the City of Bellevue planning staff this area has been designated for Medical Office, BR-MO-H2. We believe that this designation is wrong, and it should be zoned BR-MU-H2 due to several reasons listed below. But above all need for housing, specially affordable housing outside of downtown Bellevue. We also propose another alternative which is hybrid between MU and MO.

Background - This area consists of 10 properties that together make up roughly 325,000 SQFT of land, with about 119,000 SQFT improvements. All the buildings date back to 1950-1970 and are one or two-story class C buildings. Historically this area has been designated Medical Office, from NE 8th Street to Bel-Red- Road for as long as one can remember, 30+ years? Even with the last rezone for Bel-Red dating to to 2008, increasing the FAR to 4 and height to 150 feet, still did not initiate any new MOB development in this area. In fact for 40+ years no new building has been built in this patch of land! The only new medical buildings are on the Over Hospital campus. The main reason is the lack of any need for new medical offices outside of the Hospital campus!

Need for Housing- With the arrival of Light Rail and the need for more housing this area is particularly attractive for Transit Oriented Development (TOD). The parcels are much smaller than the parcels south of NE 8th St. therefore more flexible. The BR-MO-H2 zoned area has the highest concentration of small parcel and is the closest near-term developable area given the vintage of the buildings coupled with smaller non corporate tenants. Its proximity to the light rail station makes this area perfect for mixed-use and meets the needs for living and urbanization, which is the main goal of the Initiative. As an example, by displacing 8,000 of MOB one can add 240,000 of residential apartments. This is an extraordinary situation that does not exist in other Wilburton areas. Displacing, Wholefoods, HomeDepots, car dealerships etc. is not trivial.

Available Medical Zone - Furthermore, the area north of Bel-Red Road, designated as BR-MO-H2, is still available and well-suited for medical office development due to its proximity to Overlake and Children's Hospital. Additionally, Overlake Hospital still has land available on its campus for future large medical office development if and when the need arises.

Proper study to examine the actual need for MO - With the new proposed FAR between 5-6 and increased height of 250 feet, over 1.5 - 2.0 million SQFT of new medical space can be developed in BR-MO-H2 south of Bel-Red road alone! We estimate the total need for a new medical office for the next 20 years not to exceed 500,000 SQFT, which is between one third to one fourth of the potential for the proposed vision.

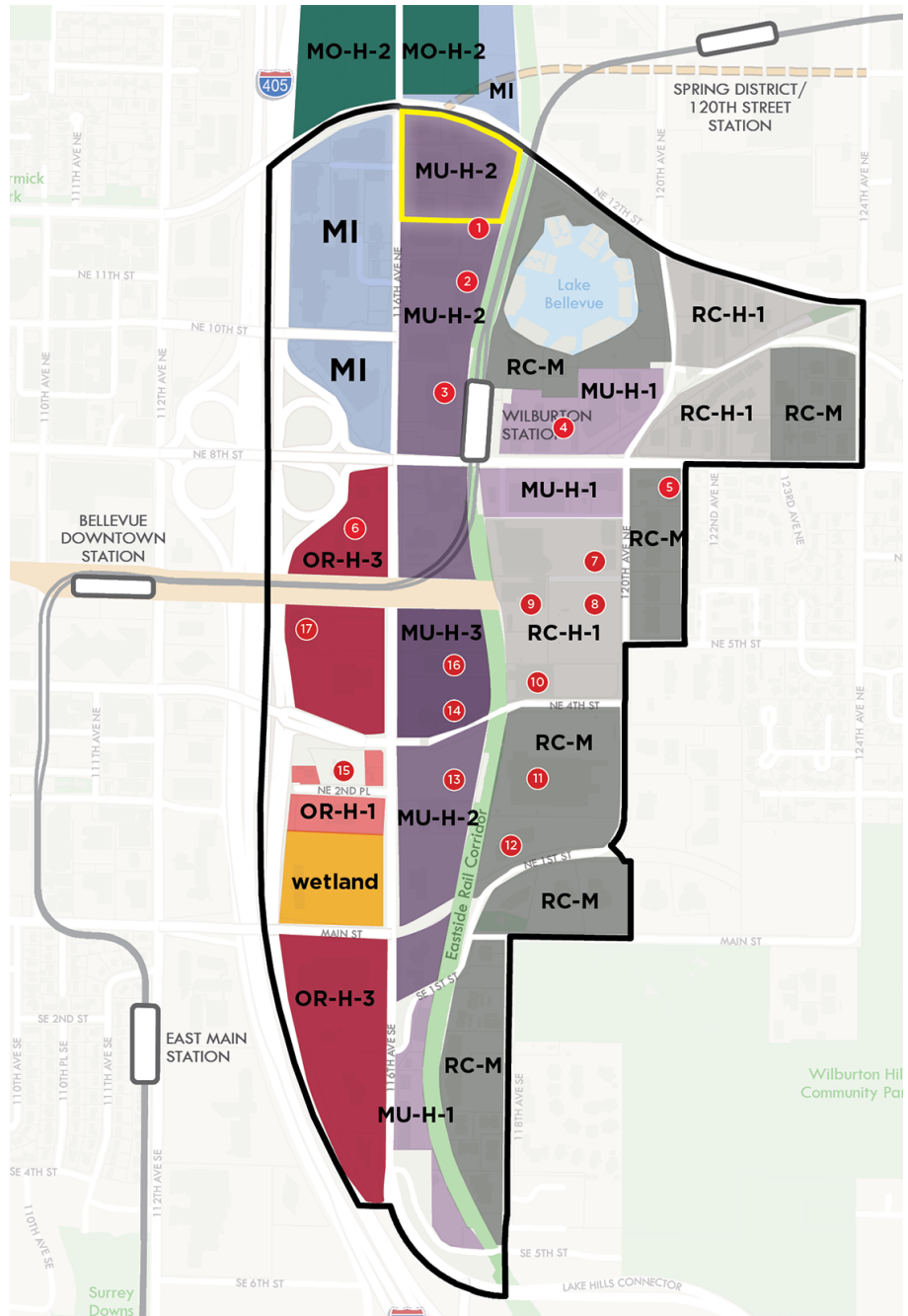
In conclusion, purely medical zoning will further stifle new development and extend the melancholy in this decaying yet full of potential neighborhood. The proposed zoning will also deprive Bellevue of the opportunity to create high density residential buildings with proximity to the light rail. The need for housing (specially affordable housing outside of downtown) outweighs the need for medical office while other possible areas, such as north of Bel-Red Road, are still zoned BR-MO-H2 and are close to both Children's and Overlake Hospitals.

Recommended alternatives to the proposed zoning

We are recommending these two alternatives to remedy the shortcomings in the current plan. They are listed in the order of preference. Obviously, they can be combined or acted upon solely depending on your judgement. We further believe that all the suggested alternatives are easy to implement and are not radically different than what has already been proposed. Nevertheless, implementing or combining one or more of the alternatives will further enhance and improve the current proposed plan. Given the current fluidity of the vision document and its support for urbanizing the rezone goals, we believe the alternatives should be given earnest consideration. Please see Exhibit B, below with illustrations.

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Extend BR-MU-H-2 designation all the way north to Bel-Red Road and keep BR-MO-H-2 to the North of Bel-Red Road. This will enable maximizing the use of Light Rail Station while protecting future medical office needs. The Washington Park complex located at 1407 116th Ave NE and all the properties north of Bel-Red is more than enough for medical office.



Recommendation 2

Allow for substantial non-medical development in BR-MO-H-2. As established above, to encourage new development while meeting the need for possible medical use, allow other uses such as residential, hotel, office, senior living, Bio-Tech, retail, etc. to be combined with medical for this zone. Require minimum 20% of FAR dedicated to medical use for any new development in BR-MO-H-2 and incentivize fully medical development buildings by granting increased FAR. This will be in line with total expected medical need.

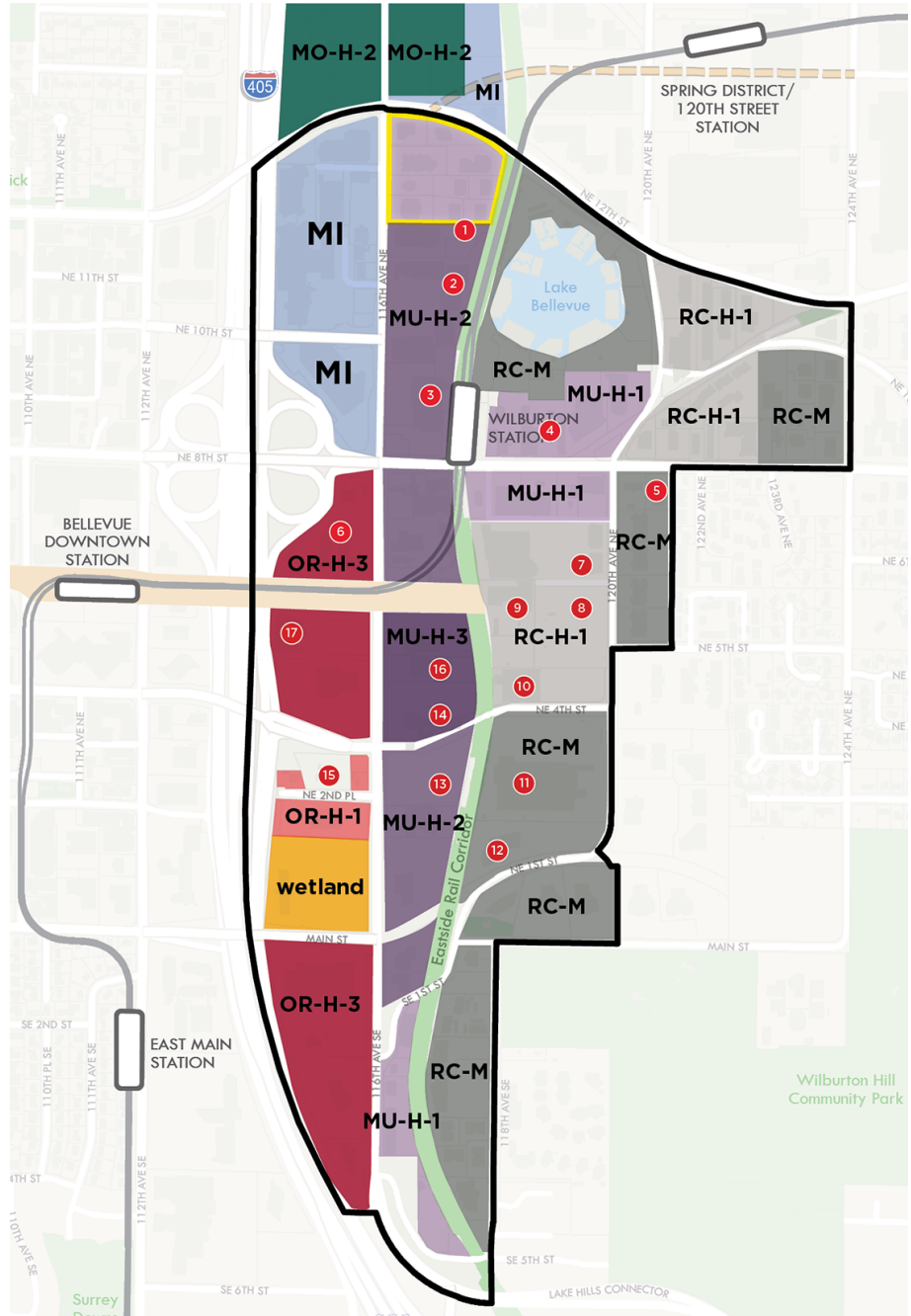
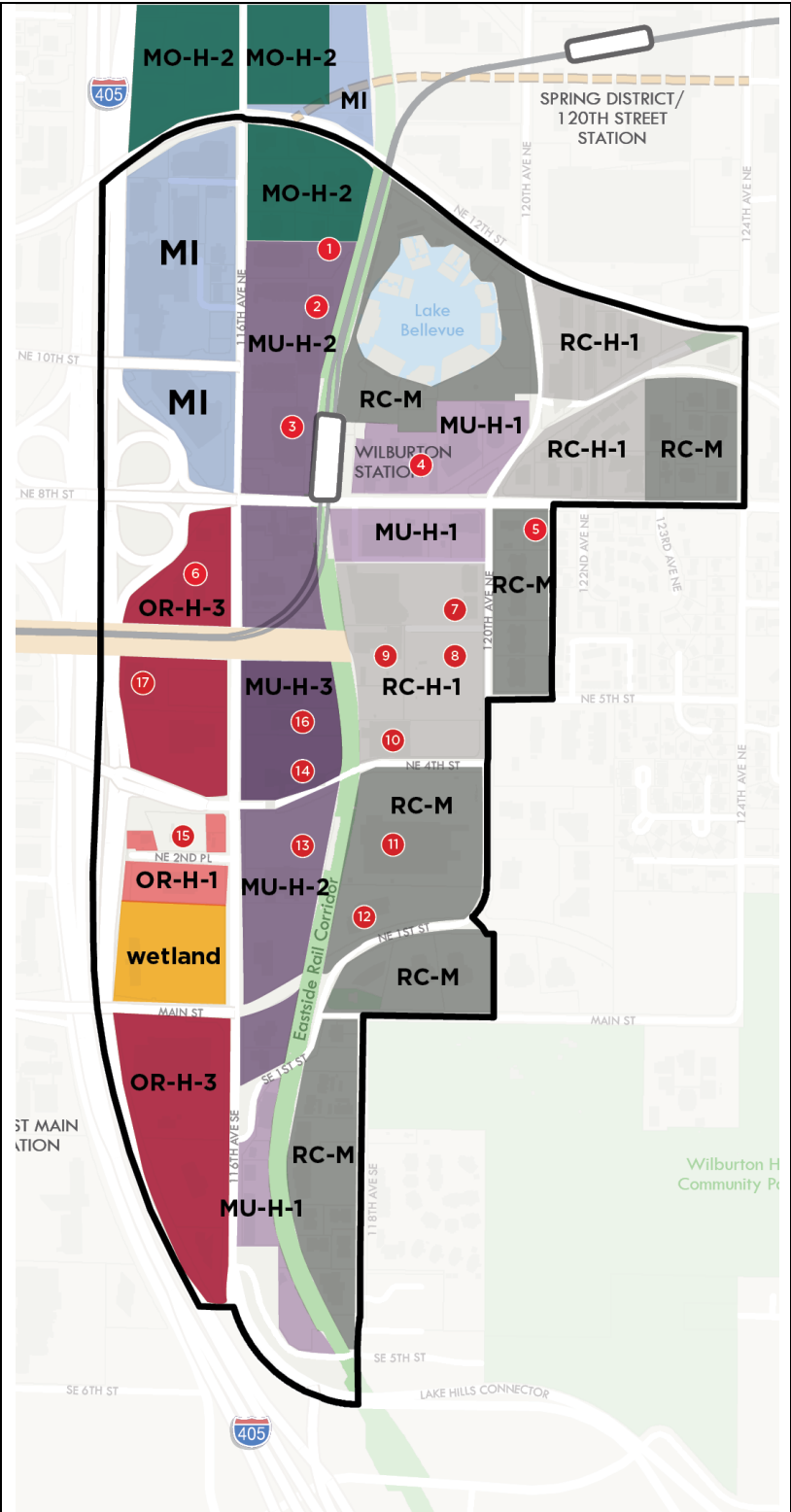


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From: [John Darvish](#)
To: [Brown, Karol](#)
Cc: [PlanningCommission](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 4:05:55 PM
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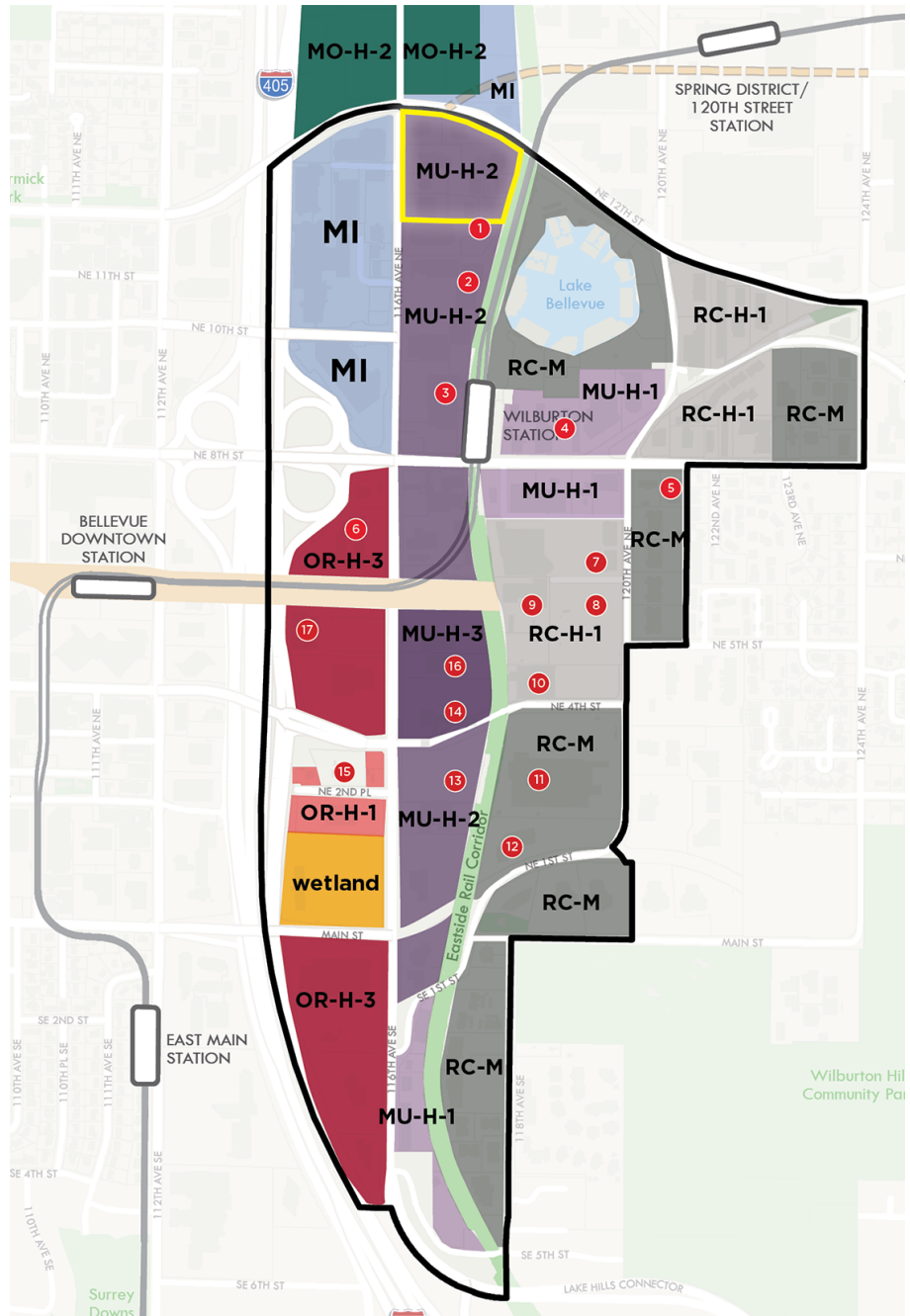
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Recommendation 2

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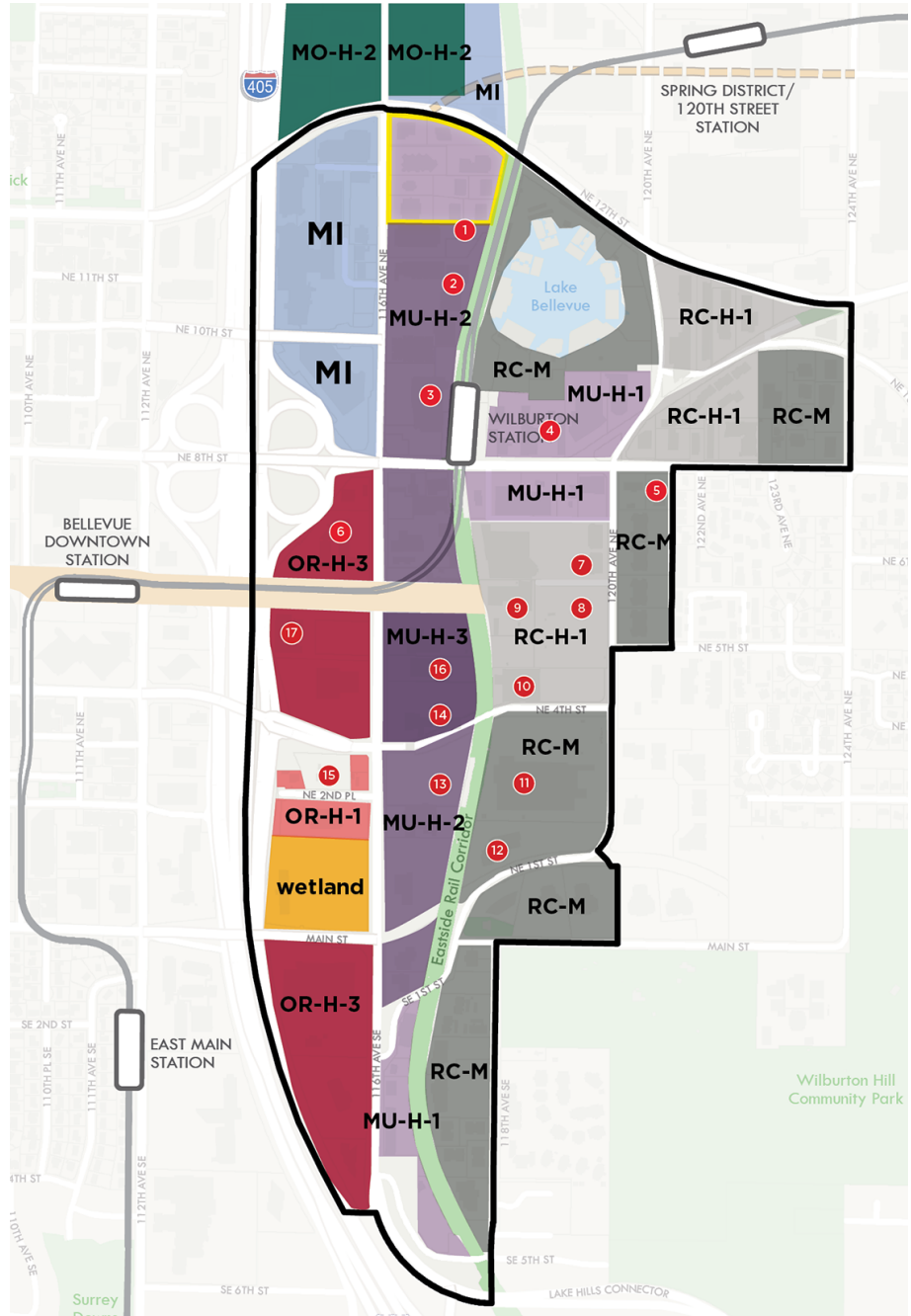
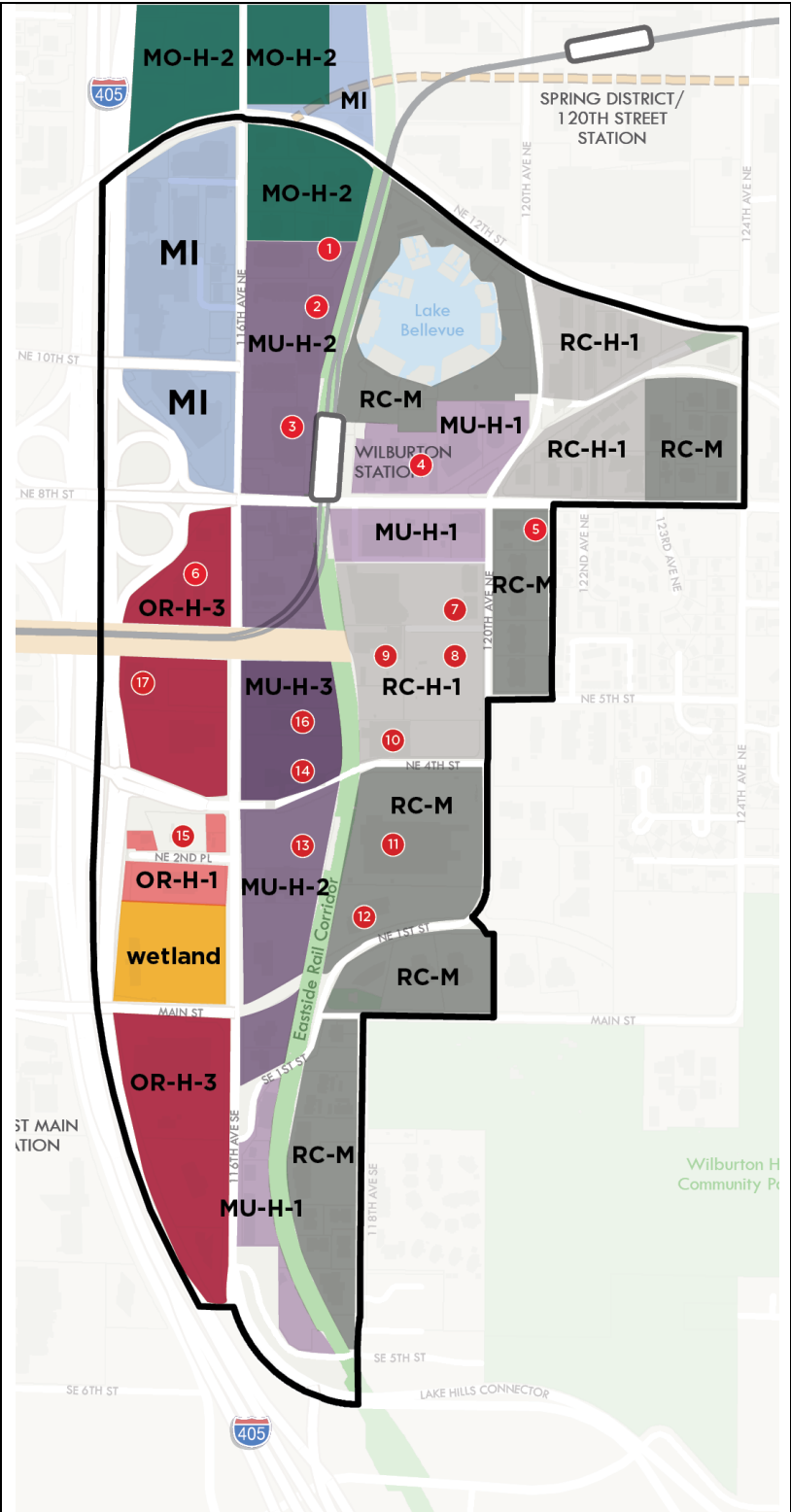


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17. Lincoln Center – City of Bellevue Owned



From: [John Darvish](#)
To: [Bhargava, Vishal](#)
Cc: [PlanningCommission](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 4:05:56 PM
Attachments: [Two-Alternatives-For-BR-MO-H2.pdf](#)
[ATT00001.htm](#)

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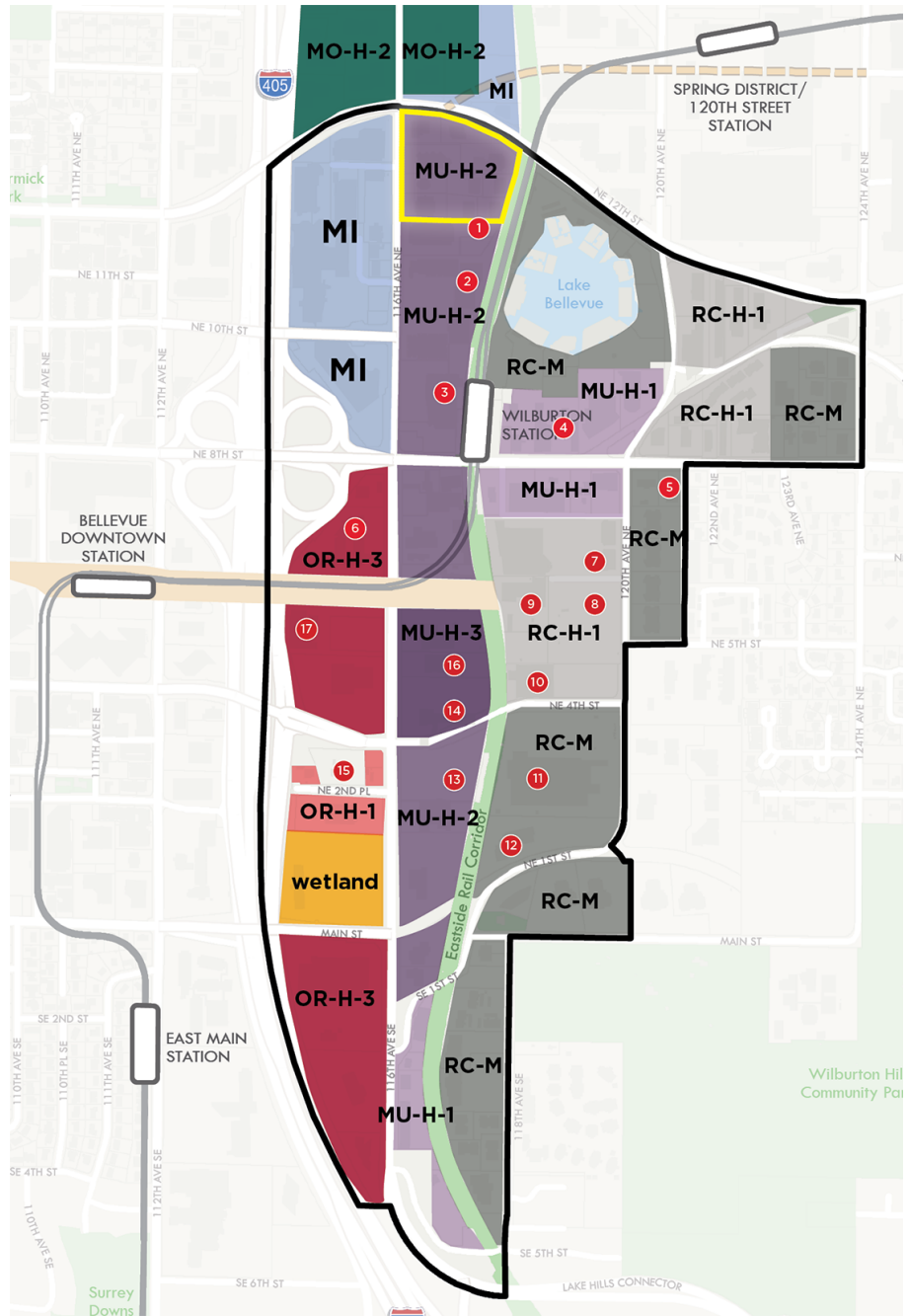
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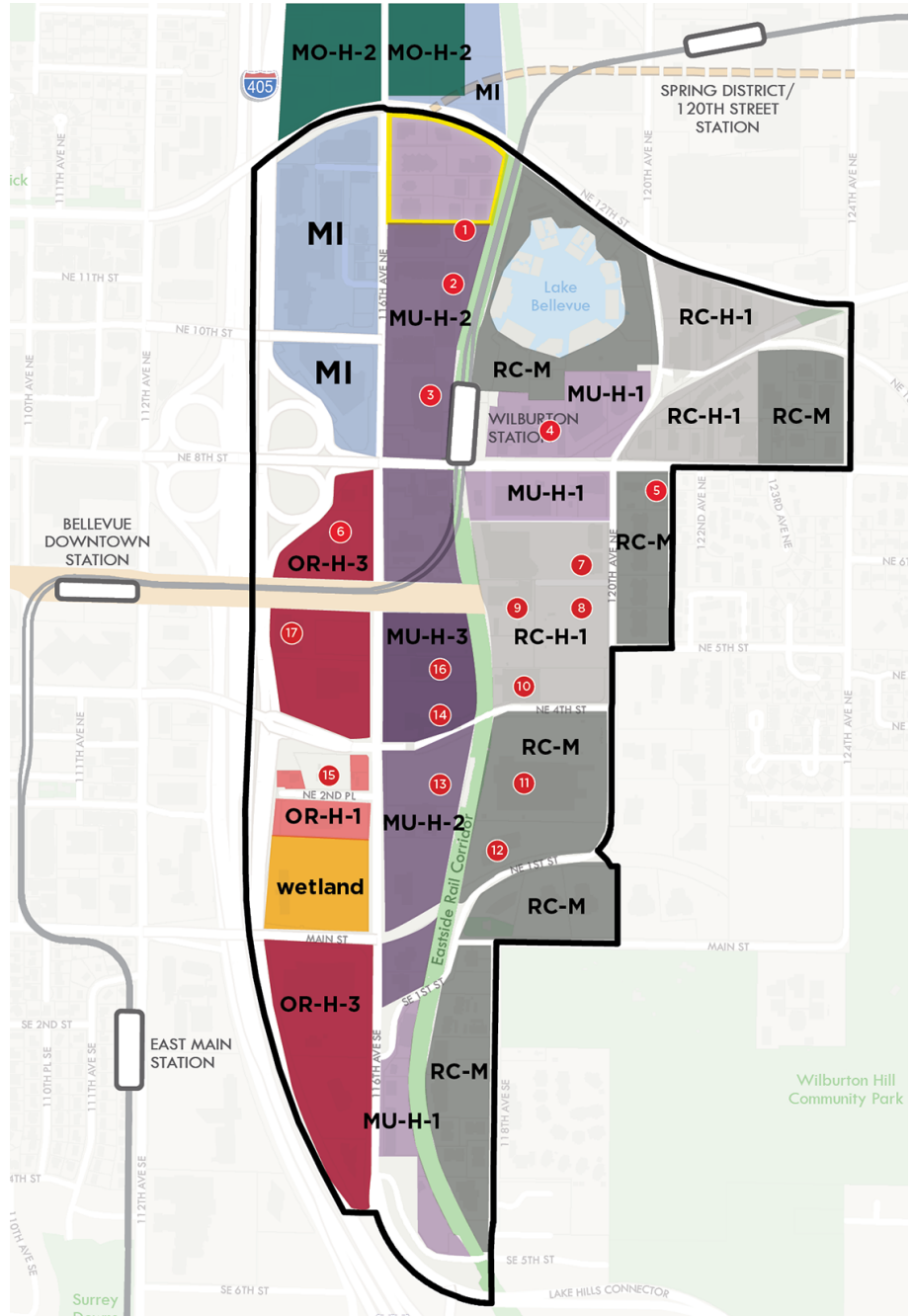
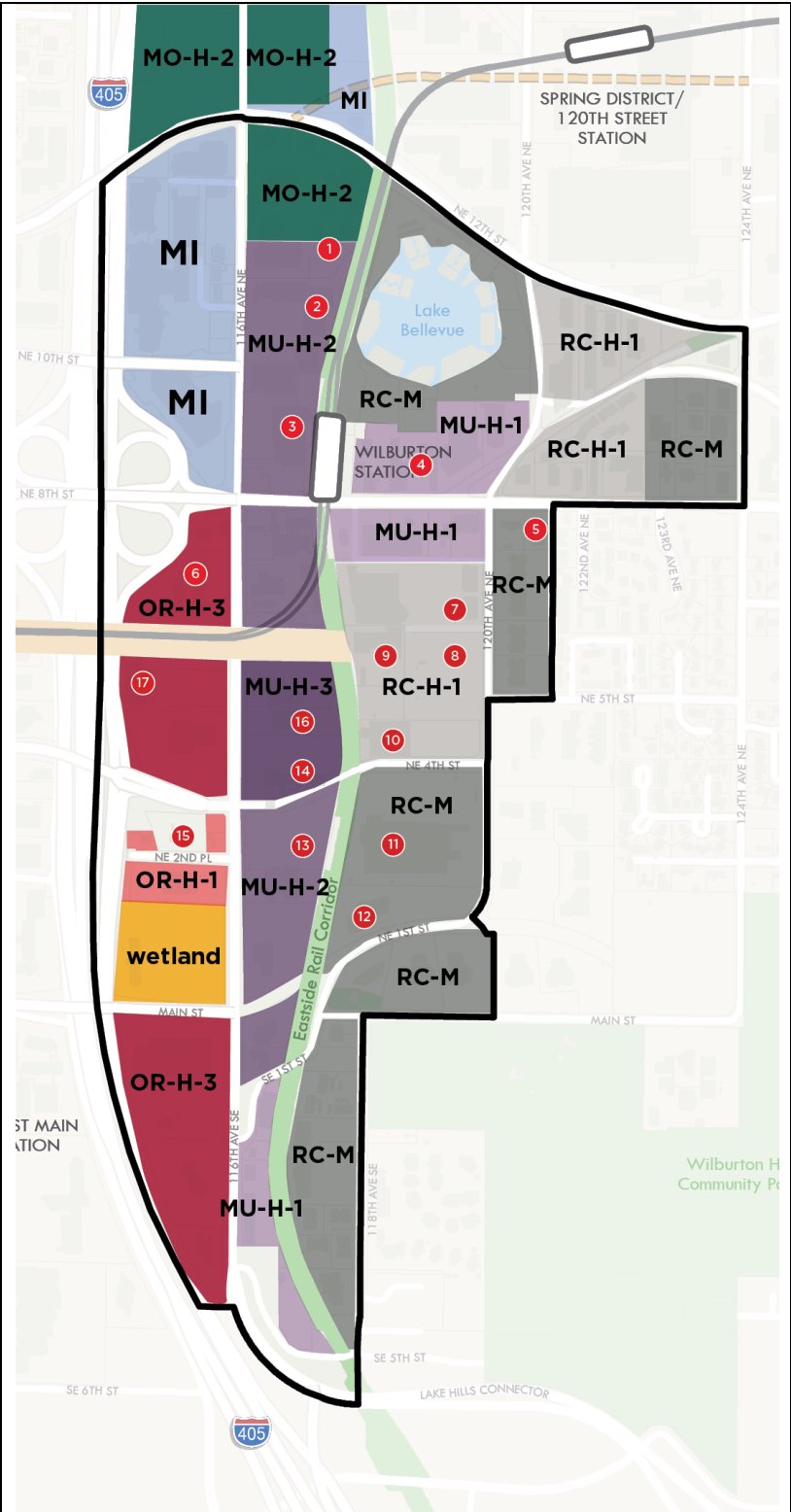


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From: [John Darvish](#)
To: [Ferris,Carolynn](#)
Cc: [PlanningCommission](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 4:06:24 PM
Attachments: [Two-Alternatives-For-BR-MO-H2.pdf](#)
[ATT00001.htm](#)

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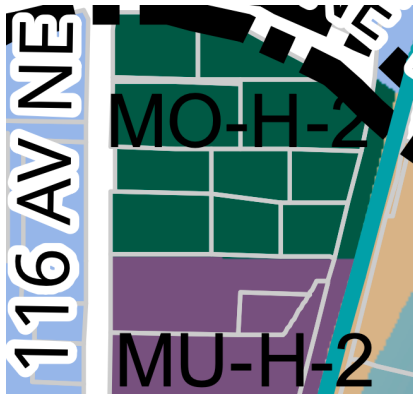
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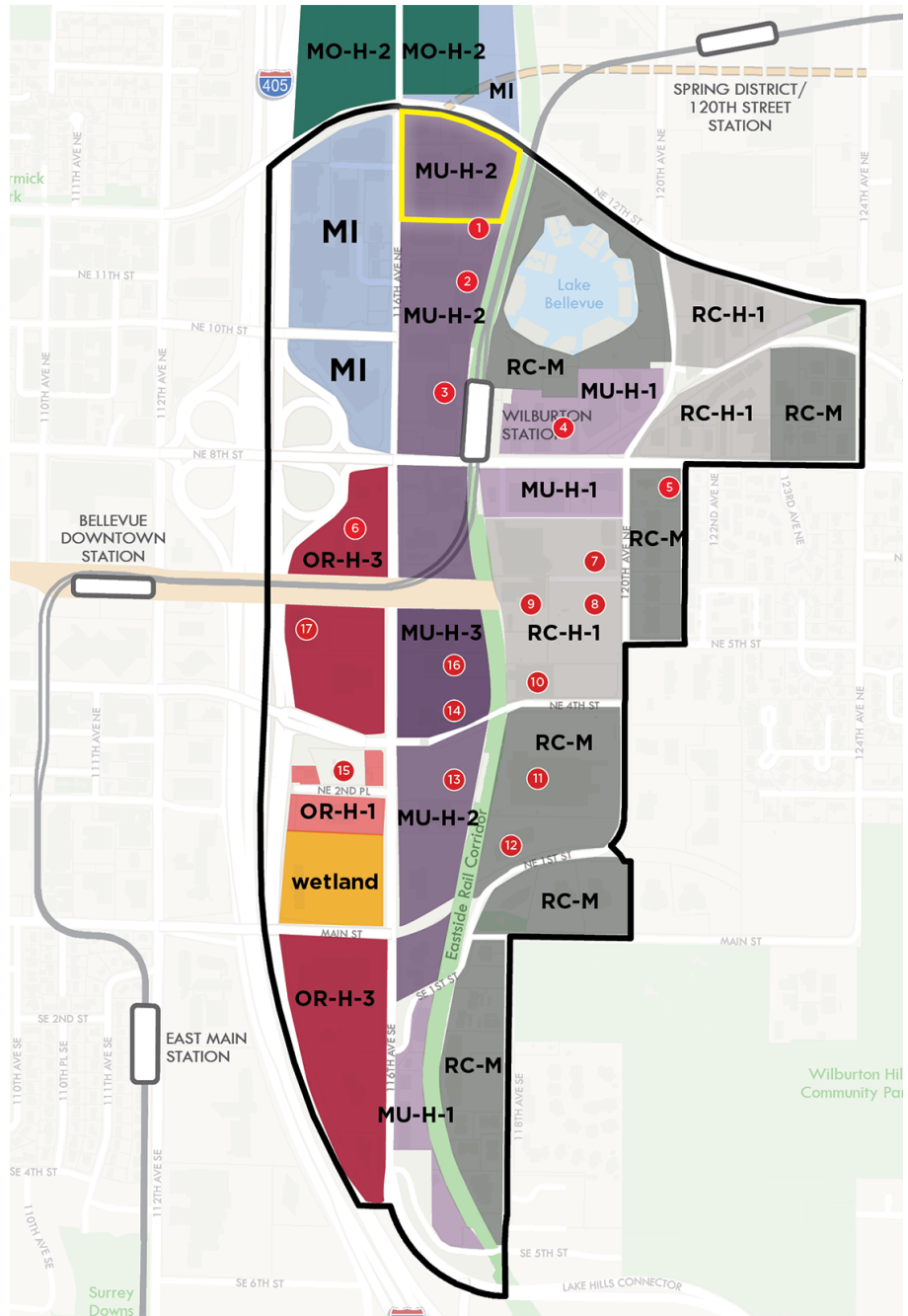
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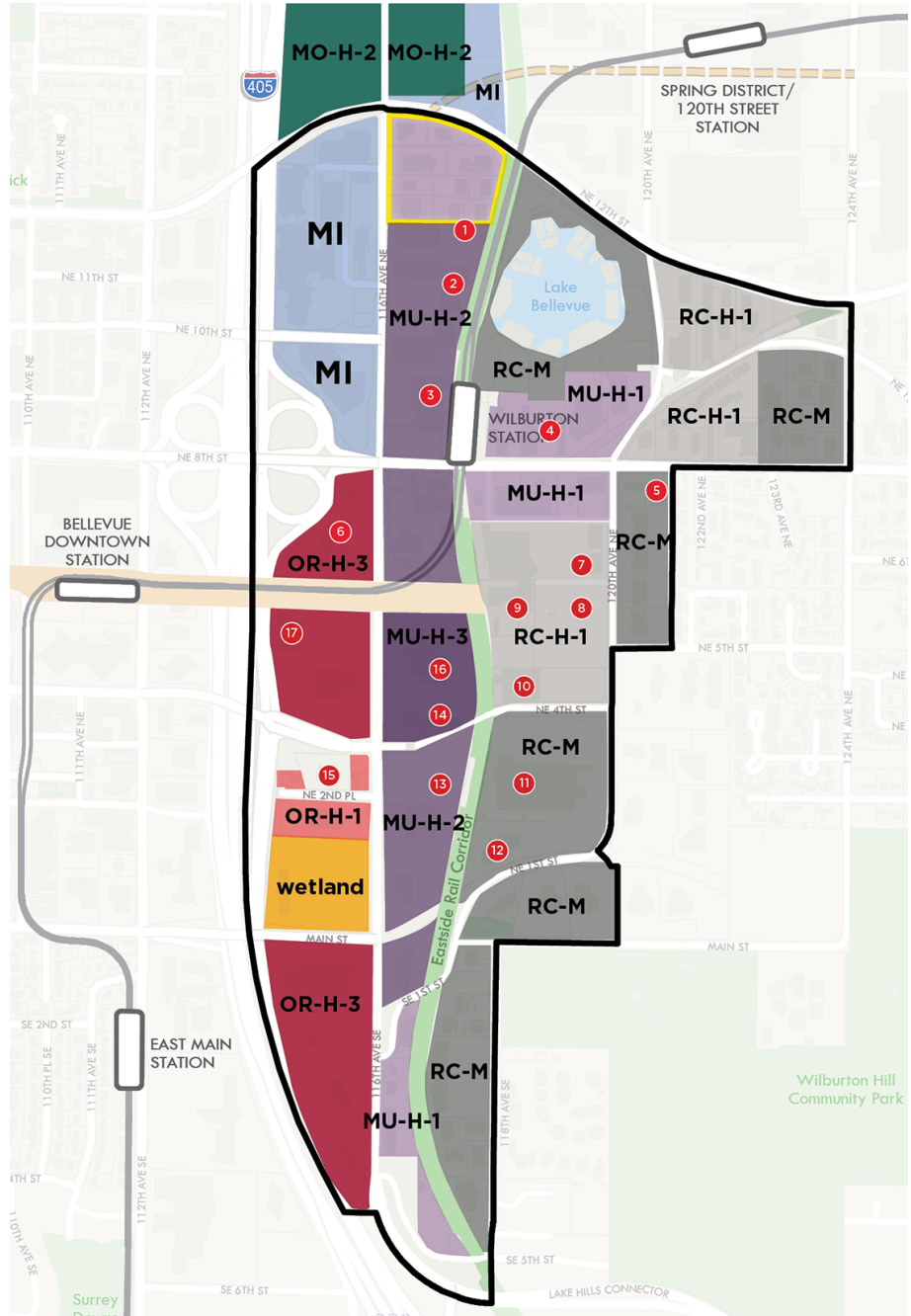
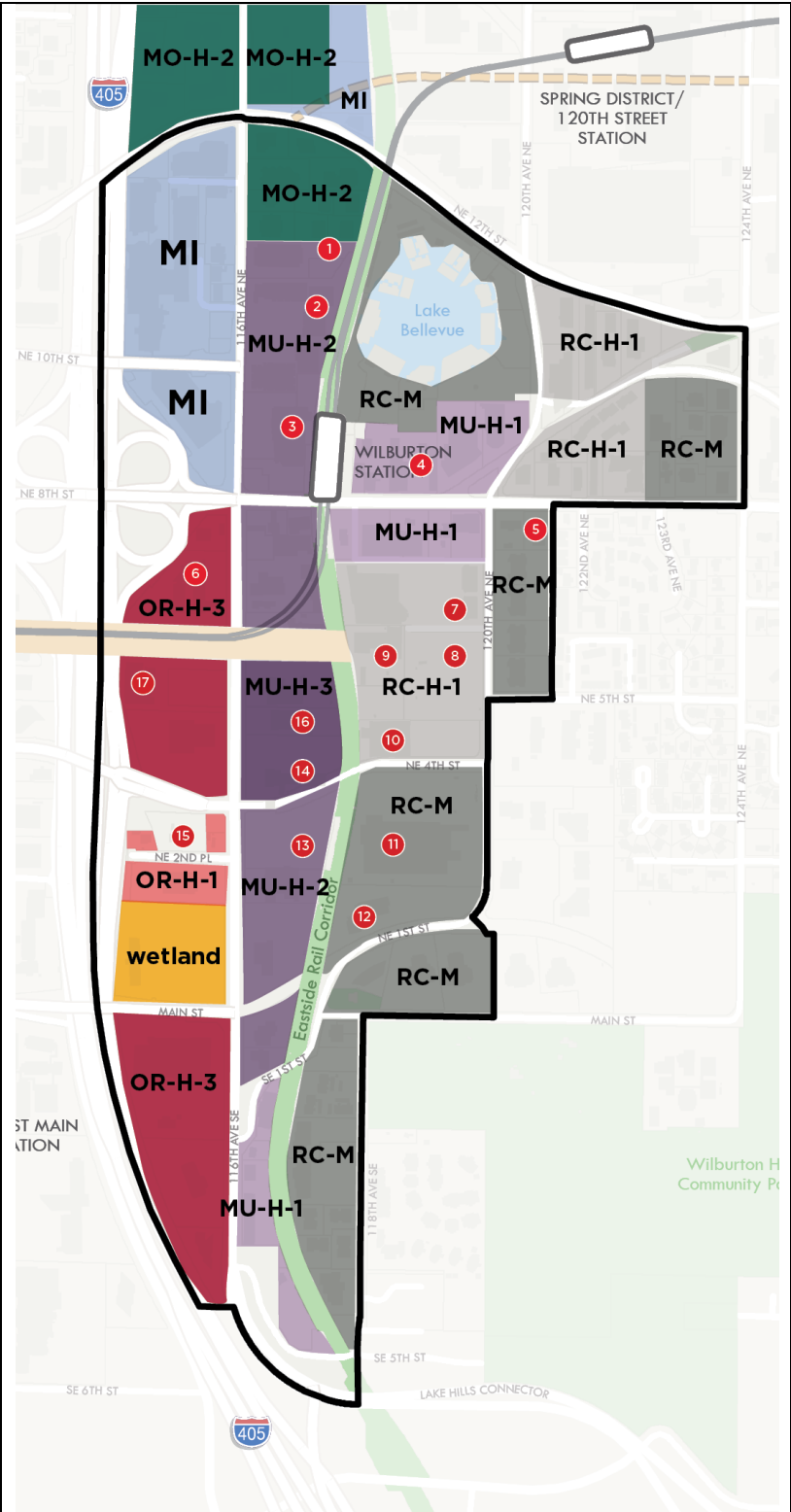


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From: [John Darvish](#)
To: [Cuellar-Calad, Luisa](#)
Cc: [PlanningCommission](#)
Subject: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Thursday, February 15, 2024 4:07:16 PM
Attachments: [Two-Alternatives-For-BR-MO-H2.pdf](#)
[ATT00001.htm](#)

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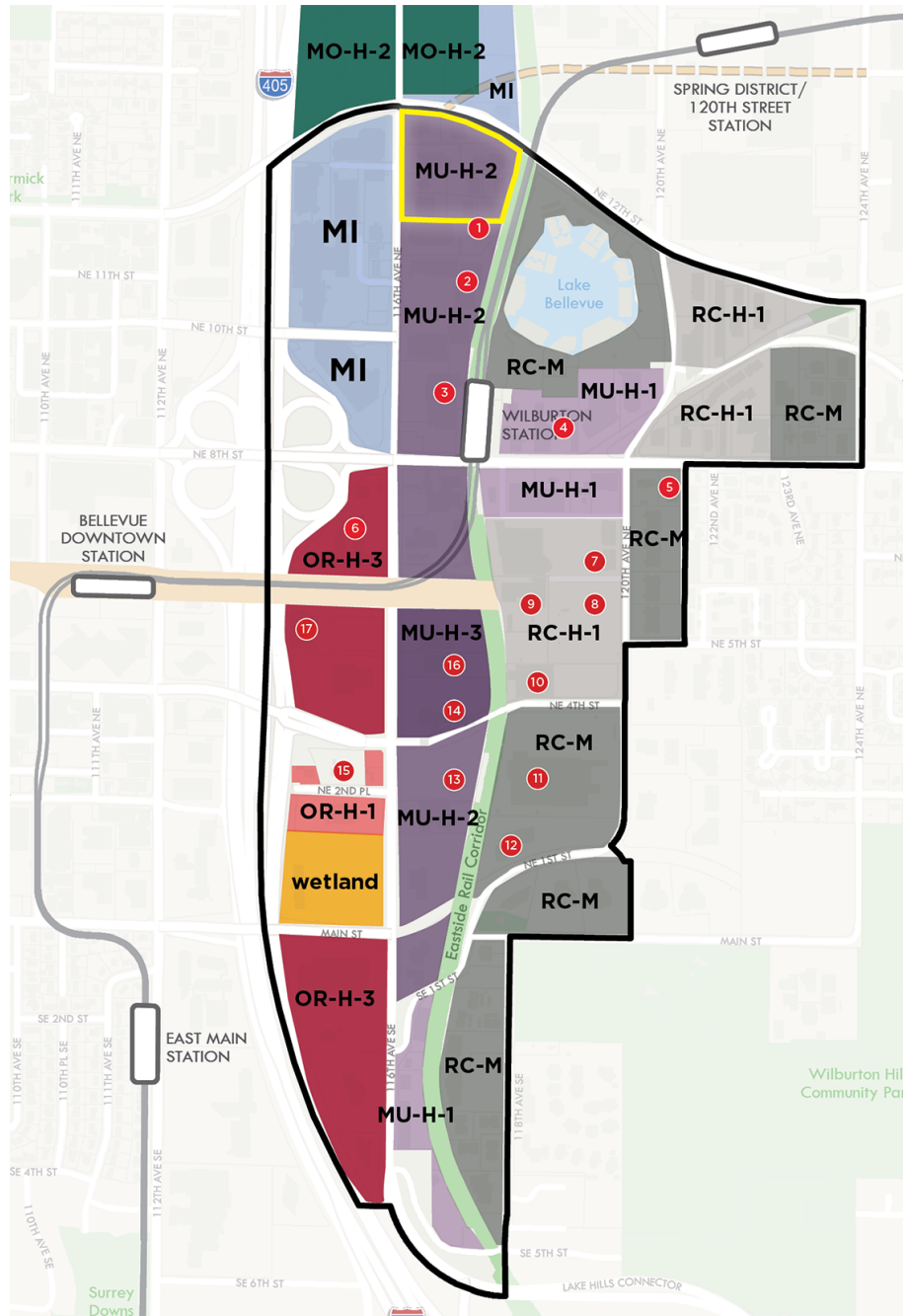
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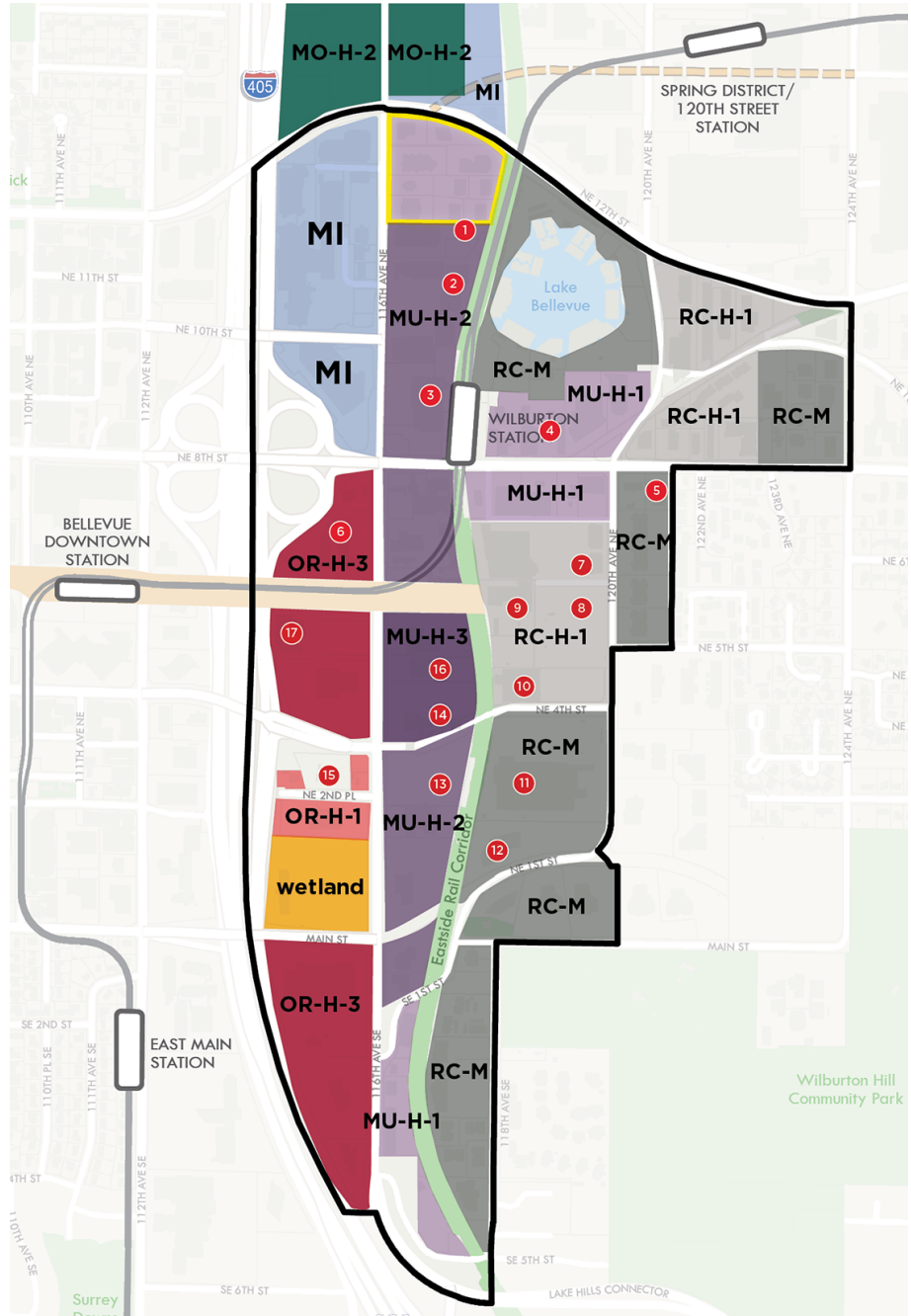
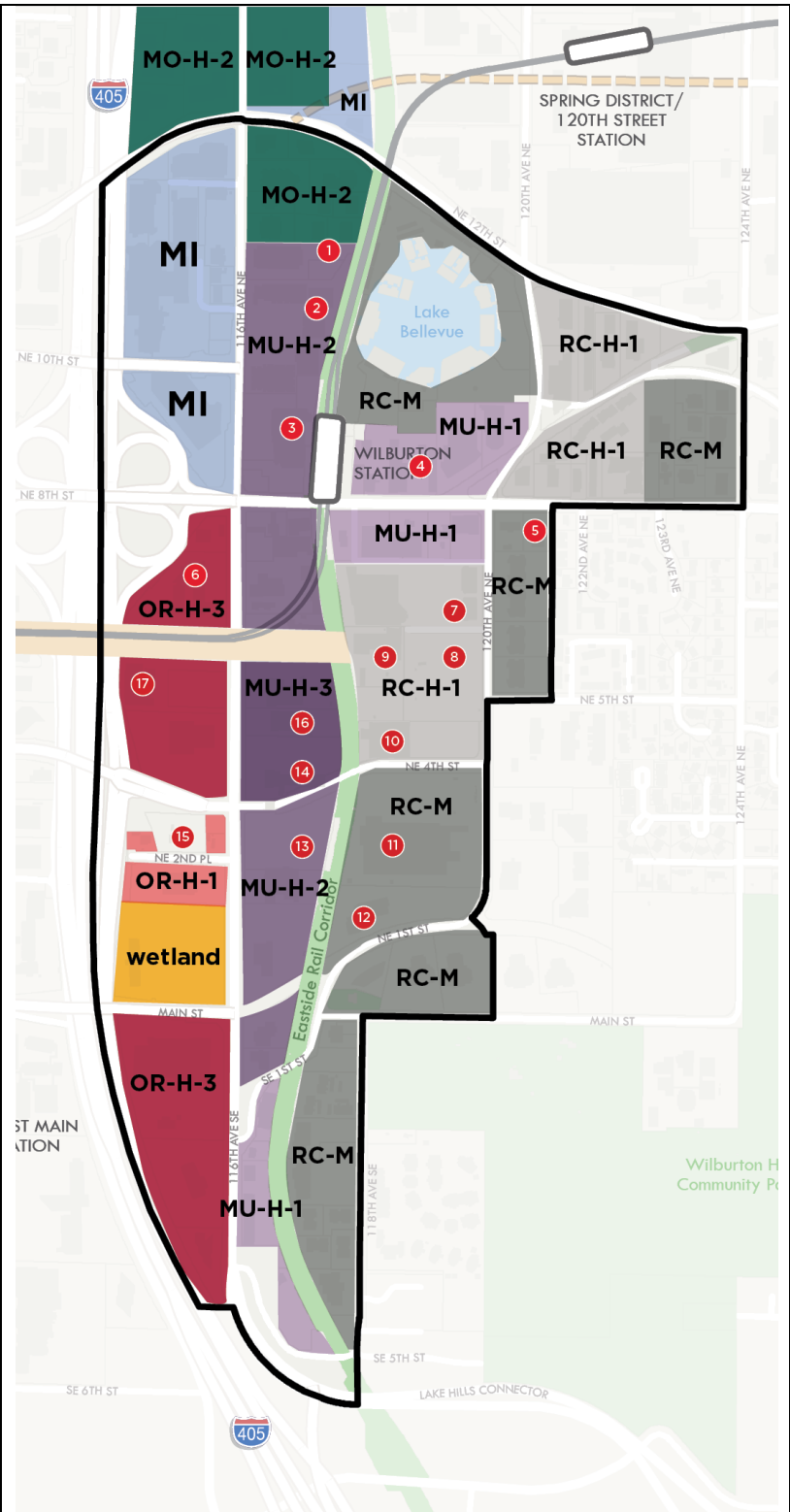


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From: [Bhargava, Vishal](#)
To: [John Darvish](#)
Cc: [PlanningCommission](#)
Subject: Re: Alternatives for Wilburton BR-MO-H2 Zoning
Date: Monday, February 19, 2024 1:43:17 PM

Hi John - Thank you for reaching out and appreciate your thoughtful and detailed input. I assure you the planning commission will consider the input you provided carefully as we work with the city staff to develop the updated land use designations for the proposed plan.

Please do not hesitate to reach out if you have additional comments.

Thanks,

Vishal

From: John Darvish <jdarvish@holistique.com>
Sent: Thursday, February 15, 2024 4:02 PM
To: Bhargava, Vishal <VBhargava@bellevuewa.gov>
Cc: PlanningCommission <PlanningCommission@bellevuewa.gov>
Subject: Alternatives for Wilburton BR-MO-H2 Zoning

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John Darvish

From: [p.johnston](#)
To: [PlanningCommission](#)
Cc: [Comp Plan 2044](#); [Council](#)
Subject: BelRed and Wilburton Urban denser than Central Paris?
Date: Sunday, March 3, 2024 6:29:45 AM
Attachments: [image001.png](#)

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Do we need our urban areas outside Downtown to be taller than Paris?

“The French capital has put in place the 'Plan Local d'Urbanisme', which limits the height of new buildings to 12 storeys - or [37 metres.](#)”



Cordially,
-pamela johnston

From: [John Darvish](#)
To: [PlanningCommission](#)
Subject: Wilburton BR-MO-H2
Date: Thursday, February 29, 2024 10:29:30 PM

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Dear Commissioners,

Thank you for the opportunity to make an oral presentation at the meeting on Wednesday February, 28. I am very pleased that all Commissioners present during the meeting unanimously supported changing the zoning for BR-MO-H2 to Mix-use. In no uncertain terms it was repeatedly recommended by the the commissioners to change the zoning to Mix-use/Residential to increase the opportunity to build more housing. I believe this is the right direction.

I am extremely please with the direction the Planning Commission is recommending and eagerly look forward to reviewing the revised recommendations by the planning staff.

As always, please do not hesitate to let me know if I can be help.

Warm regards,

John Darvish

happy man



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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From: [John Darvish](#)
To: [King, Emil A.](#); [Shull, Janet](#)
Cc: [PlanningCommission](#)
Subject: Wilburton revisions
Date: Thursday, February 29, 2024 10:22:23 PM

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Dear Emil and Janet,

I hope you are both doing well. At the Planning Commission meeting on Wednesday, Feb. 28, 2024, the commissioners unanimously recommended changing the zoning designation on BR-MO-H2 to Mixed-use/residential. The impetus behind their recommendation is to create as much opportunity for residential as possible. This requires changing the medical office zoning directly across the street from Overlake Hospital to residential/Mix-use. This is an important message I took away from the meeting since it was repeatedly mentioned in no uncertain terms that the Medical Office designation is not appropriate for the area across the street from Overlake Hospital.

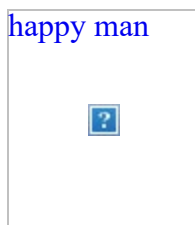
However, I think it will be fair to keep the two parcels owned by the hospital on the south end as MO to respect the current ownership. But this is eventually your and Planning Commission call. I have no strong opinion either way.

On a different note, you could possibly even consider BR-MU-H3 since the 1200 building is only .2 miles from the Wilburton station according to digital maps (Google maps).

Please do not hesitate to let me know if I can be of any help. I look forward to reviewing the revised packet.

Warm regards,

John Darvish



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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From: [p.johnston](#)
To: [PlanningCommission](#)
Subject: Wilburton
Date: Wednesday, February 28, 2024 8:56:56 PM

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Please consider if the design vision from the CAG

https://bellevuewa.gov/sites/default/files/media/pdf_document/WCA%20Report%20Final%20Published%20Version%20with%20Errata.pdf

–pamela.johnston

425-200-2224

From: [p.johnston](#)
To: [PlanningCommission; Malakoutian, Mo](#)
Cc: [Comp Plan 2044](#)
Subject: BelRed,, Wilburton Urban,, Factoria Land Use Changes
Date: Monday, March 4, 2024 5:40:09 PM
Attachments: [image002.png](#)
[image006.png](#)
[image001.png](#)
[image003.png](#)
[image007.png](#)
[image008.png](#)

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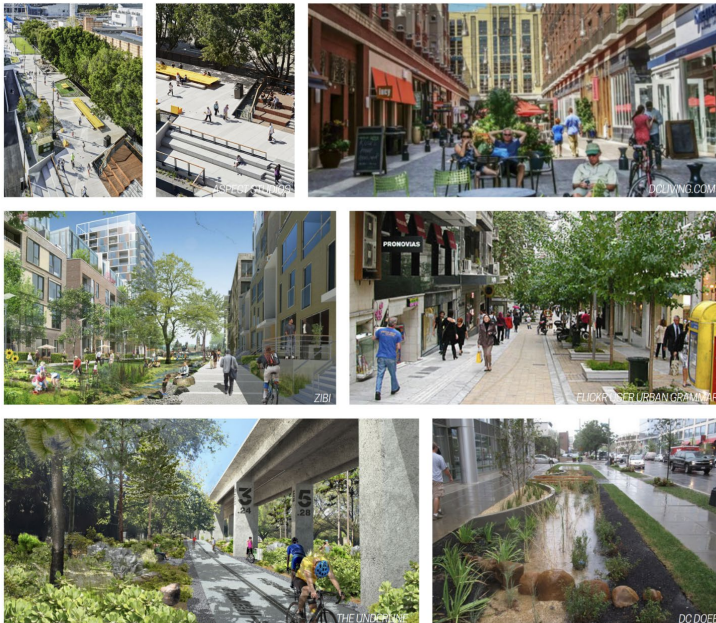
Sharing in the benefits of development?

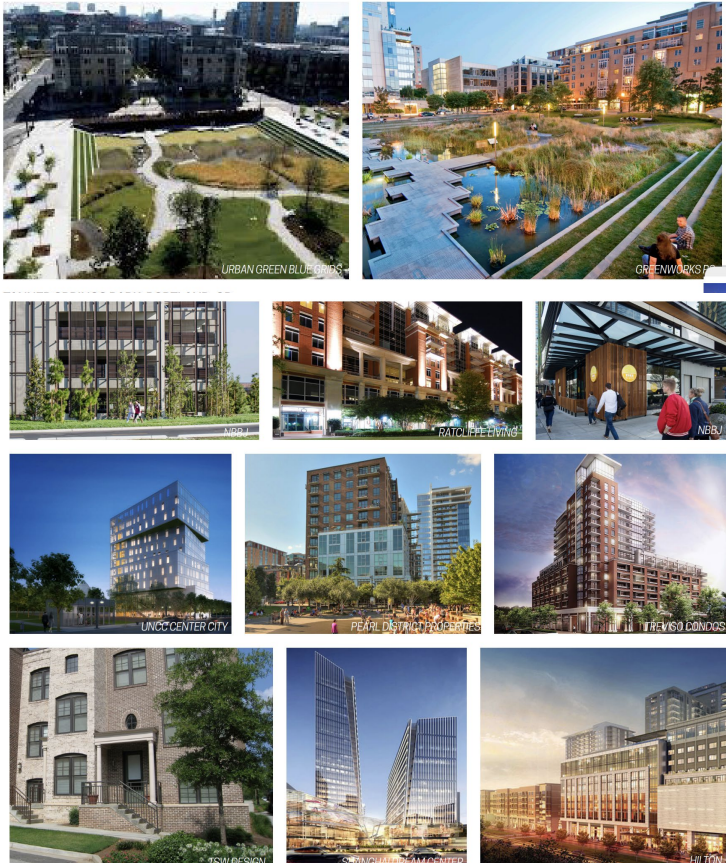
Dear Planning Commission:

I'm concerned about the changes in Factoria/Eastgate Land Use as well as BelRed and Wilburton Urban. We don't need 3 downtowns. We want City in a Park.

I am opposed to heights over 12 stories. Paris is a 15-minute city with about 120' maximum height limit. The height in the comp plan is not needed in the next 20 years. Downtown now has infill towers. Wilburton Urban and BelRed just getting started. We do not need the extra capacity. We do not need to set ourselves up for failure as pictured above.

In the Wilburton Urban exercises, red brick, traditional structures were selected as key. Look at the pictures in https://bellevuewa.gov/sites/default/files/media/pdf_document/WCA%20Report%20Final%20Published%20Version%20with%20Errata.pdf



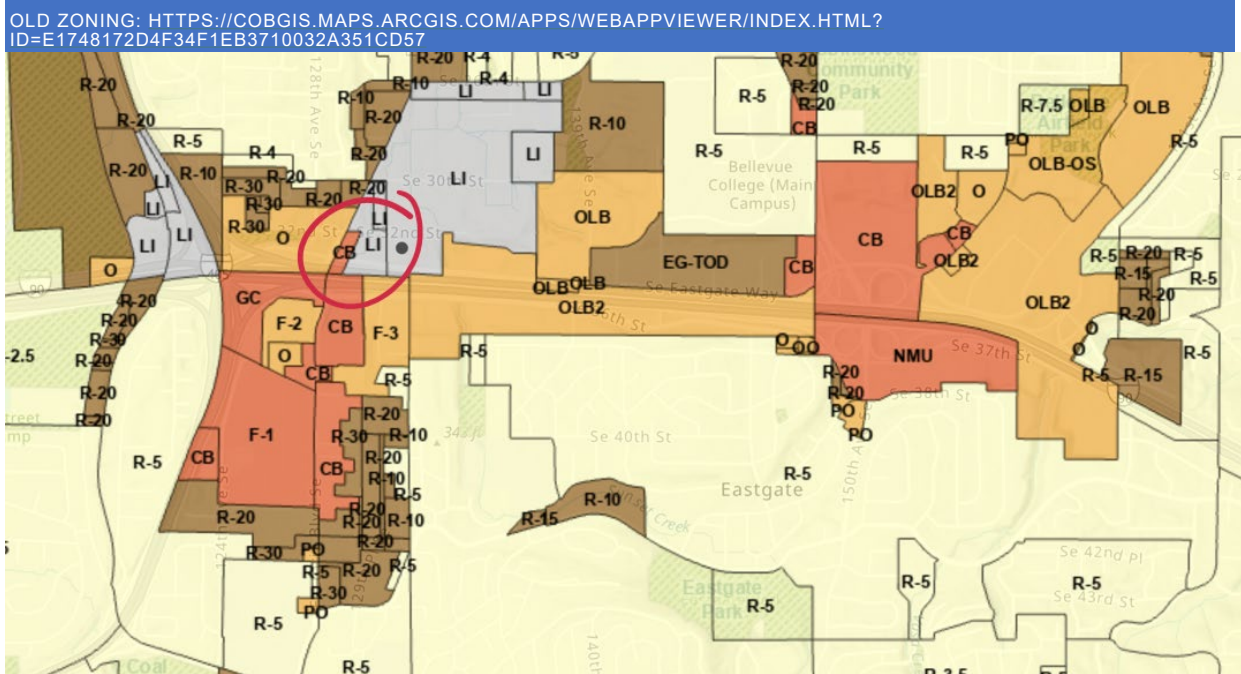


These last two don't fit with the others. Commercial and Industrial does not have the heart of mixed use.

While I have not considered the right cp designation fully, I feel changing the height designation in the comp plan is beyond the scope of the outreach. I have not experienced a good understanding the density, height, and land use changes from the neighborhood.

I am opposed to this level of change in the comp plan 2044 for the Factoria area, because my cursory check on the understanding of the change and buy-in by the neighborhood is low.

See one small change circled in the maps. Other changes include changes to add to the level of housing.

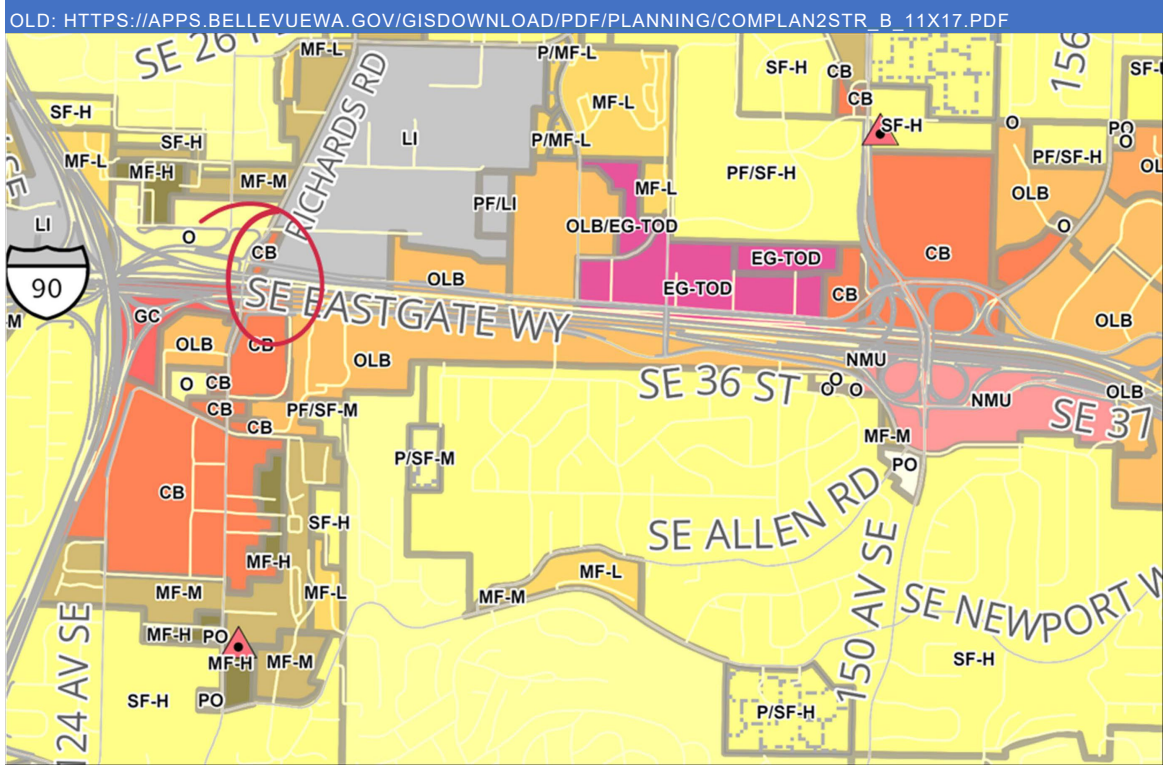


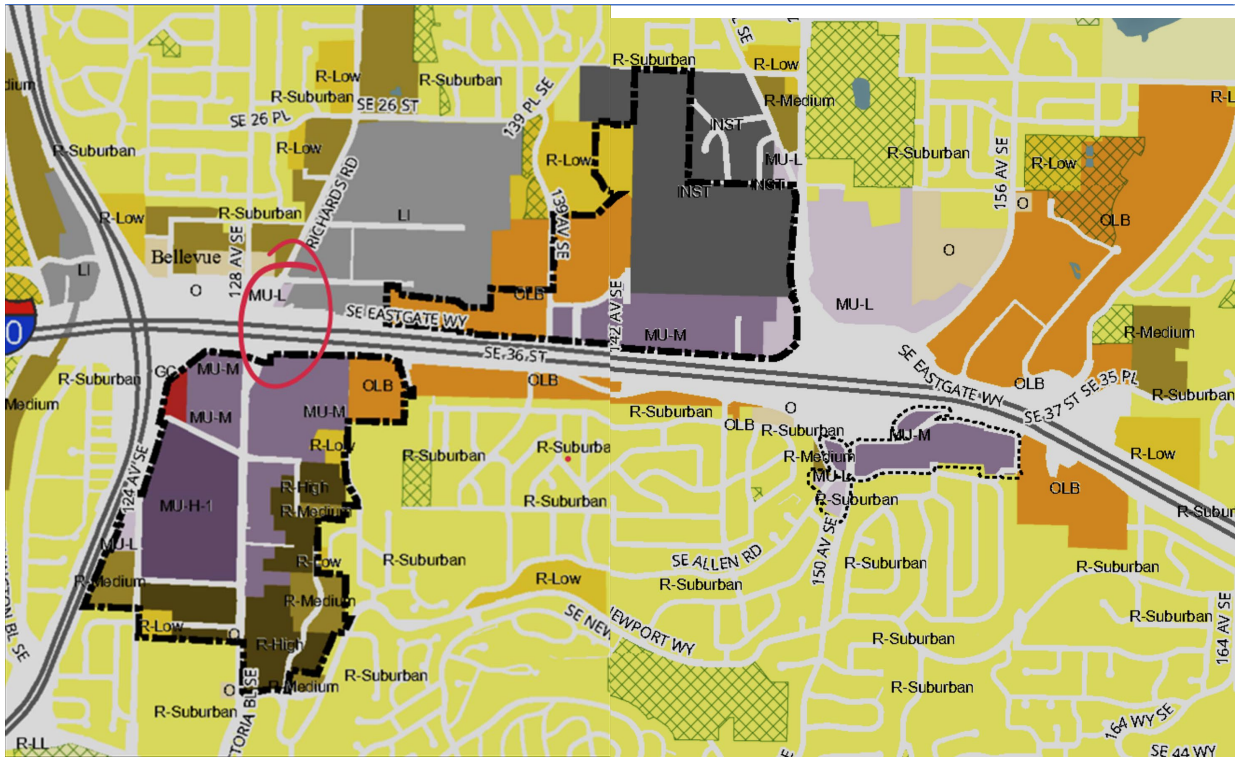
20.10.395Factoria Land Use Districts (F).

A. **Factoria Land Use District 1 (F1).** Factoria, **F1** District is a mixed-use residential and regional retail center located adjacent to freeway corridors. It is to be developed as an aesthetically attractive urban village center to serve the Factoria community as well as shoppers attracted to the retail stores. Specific development areas and design guidelines apply within the district. Total size of the district is approximately 40 acres.

B. **Factoria Land Use District 2 (F2).** Factoria, **F2** District provides for intensive office, movie theater, and service uses adjacent to freeway corridors in the Factoria area.

C. **Factoria Land Use District 3 (F3).** Factoria, **F3** District provides for highly intensive office use in an integrated complex adjacent to freeway corridors in the Factoria area. This is the most intensive office district outside the Downtown. (Ord. 5385, 7-15-02, § 4)





Cordially,
Patricia Johnston
425-881-3301

Please include me as a party of record.

Wilburton Background Information (1)

Area: 2.601 miles

Population: 4,566

Percentage of City: 3%

Under 18: 934 (20% of the area)

Housing Units: 1,948

“Bellevue’s historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also surrounded by major parks, including the acclaimed Bellevue Botanical Gardens and the 160-acre Kelsey Creek Park. Wilburton provides a strong community and a place to call home near the heart of Bellevue, but with the quiet of a residential neighborhood.

The Wilburton neighborhood area reflects Bellevue’s past and its future. With the historic Wilburton Trestle on the south, it promises to be a key landmark for the development of the north-south East Rail walking and biking corridor. Wilburton’s business district will provide the destination for the Grand Connection linking to the pedestrian corridor across I-405, through downtown to Meydenbauer Bay. The Wilburton light rail station on NE 8th will provide easy access around the region.”

Dear Planning Commission Board Members and Deputy Mayor Mo Malakoutian,

My name is Phyllis White, and I am a resident of the Wilburton subarea, situated half a block away from the BelRed growth corridor. Tonight, I am reaching out on behalf of the residents within our Wilburton subarea, specifically the area between BelRed Road and NE 8th Street.

Bellevue is a community blessed with unique and diverse residents of different ethnicities, including Wilburton and its differing subareas. Two streams, the Goff Creek, and Kelsey Creek run in our Wilburton subarea. Most trees surrounding the streams and residential private properties are over one hundred feet tall, and many reach heights of about 200 feet tall. They are all a part of the critical area ecosystem which includes different species of fish, Chinook, Coho, Cutthroat trout, and other animals, such as beavers, blue herons, hawks, bald eagles, bats, deer, opossums, coyotes, owls, bats, and others found around the riparian corridor Goff Creek and Kelsey Creek leading to the Mercer Slough. We have enjoyed watching fish swimming through the stream; however, the water is increasingly turbid and there are few encounters with fish today.

By 2030, the 900-acre Bel-Red corridor development is expected to generate 10,000 new jobs and 5,000 housing units. The Bel-Red corridor already has some recent development of condominiums and apartments in the Bel-Red development, and the Sound Transit light-rail will begin taking passengers on April 27.

Enclosed you will find a Wilburton neighborhood poll that was conducted last year. In order to gauge how our neighbors who live on 130th, 132nd, and 134th St. feel about future residential growth that may affect our neighborhood, we created a poll and distributed the survey to about 79 homes. Within a week, we received 63 responses. The majority responded within 3 days.

Some of our survey results are listed below:

- Over 97% feel that increasing density with a variety of middle housing options would have a negative impact on the quality of life in our neighborhood.
- 92% feel preserving the environment outweighs the benefits of increasing housing density in light of the surrounding housing and business growth.
- When single-family housing was not an option, 73% favored one ADUs or DADUs, 13% favored 2 maximum housing units, 12% favored only single-family homes, 1% favored a maximum of 3-4 housing units, and (80%) also voted for owner occupancy when renting ADUs and DADUs. Safety was a major concern.
- 86% voted to have the Council maintain authority for the decision-making for our city.
- About 75% feel Council Members need to vote in a manner reflective of the community when addressing affordable housing needs and public safety. Only 15% feel Council Members are listening to residents.
- Public comments included public safety issues and crime.

Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, its sub-tributaries, and wetlands flow through Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score. Moreover, the Kelsey Creek riparian corridor is designated as a priority habitat by the Washington Department of Fish and Wildlife.

I urge you to update the Bellevue's final Comprehensive Plan to meet King County's Update on the Best Available Science and Critical Areas Ordinance effective amended to meet the state law and regulations for the GMA, including RCW 36.70A.130 and WAC 365-196-610.

"...the state has added a standard of "no net loss" to protection of functions and values of critical areas at the ecosystem scale (WAC 365-196-830)..." (see attached 2024 King County Comprehensive Plan, Update on Best Available Science and Critical Areas Ordinance Review.)

Thank you for your attention to this matter. I look forward to your thoughtful consideration of the concerns raised by neighborhood.

Sincerely,

Phyllis White

1. <https://bellevuewa.gov/city-government/departments/community-development/neighborhoods/neighborhood-profiles>

Wilburton TOD Area

Staff Proposed Changes from Preferred Alt



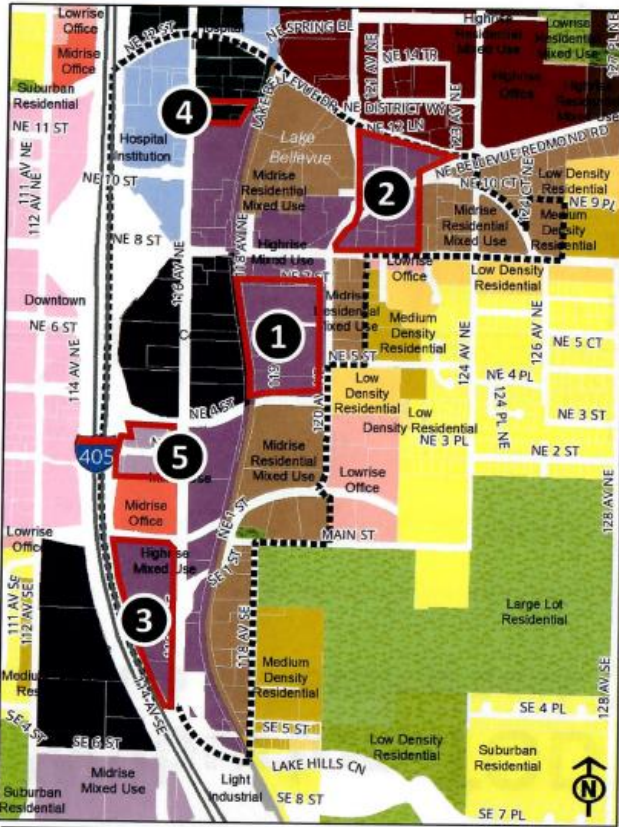
At your previous meeting on Feb 28th the staff presented their proposed land use changes for Wilburton (on left of this page).

There were questions raised about the location of multimodal infrastructure, specifically in relation to areas 1 and 2 on the map.

These areas currently have more multimodal infrastructure investment than just about any area in the region, and more is coming! (see next page)

Keeping the flexibility of a ‘mixed use’ zone recommended by the staff makes sense for this area. In the Mixed Use zone housing is allowed, and incentives will most likely be made to encourage it. At the same time keeping it Mixed Use allows for flexibility over a 20 year plan, which is important for an area like this where so much multimodal investment has occurred.

Thank you for the work you do and for your consideration.



	Future Land Use	Similar to	Rationale
1	Highrise Mixed Use	Alt 3	Greater flexibility toward development outcomes
2	Highrise Mixed Use	Alt 3	Greater flexibility toward development outcomes
3	Highrise Mixed Use	Alt 1	More gradual density transition; supports defined core adjacent to future multimodal investments
4	Highrise Medical Office	Alt 1 and 2	Consistency with adjacent medical uses
5	Midrise Mixed Use	Less than EIS alts	More appropriate scale adjacent to wetland, lot size

Multimodal Infrastructure Near areas 1 and 2 from Staff Proposed Changes to Wilburton in FLUM

Green line is I-405. The center of area 2 is approx 2,500' from the freeway onramp (following the road). For comparison the Bellevue Transit Center is approx 1,700' from the onramp to I-405.

Yellow line running North/South is the Eastrail. A 42 mile bike/ped path with connections to Kirkland and Redmond and across 520 and I-90. The Yellow Line running along 120th and down 4th is the existing bike lanes that were put in when 120th was upgraded to a 'complete street' with separated sidewalks and bike lanes on both sides.

The Blue Line is the Rapid Ride Bus Route, the only one on the Eastside. It runs Crossroads to Bellevue Transit Center along NE 8th. Metro says it is their "highest level of investment in convenience, innovation, reliability and service." It runs approx every 10 minutes. Blue Stars represent stops.

<https://kingcounty.gov/en/dept/metro/routes-and-service/schedules-and-maps/b-line.html#route-map>

Grey circles represent approx ¼ mile walkshed around Wilburton and Spring District Station. Grey Box represents Wilburton Light Rail Station.



To: Planning Commission

We, the undersigned, urge you to agree with the planning department staff recommended changes shown in the Future Land Use Map for areas 1 and 2 on the attached map for “highrise mixed use” designations. These areas are both within the quarter mile walkshed of light rail stations, within a block of the Eastrail, adjacent to the only Rapid Ride Bus line on the Eastside of Lake Washington (running on NE 8th), within a quarter mile of the terminus of the Grand Connection and have easy access to I-405. The billions of dollars of multimodal investment these facilities represent were made with the intent of creating an urban area with high densities and a variety of future development.

“Mixed Use” Provides a Flexible Framework to Deliver Housing

The clear current focus, of both the market, and the city of Bellevue, is increased housing, and the “mixed use” FLUM designation allows for residential development. Incentives can also be included in the upcoming Land Use Code Amendments (LUCA) which further prioritize housing above other uses. The combination of incentives and market demand will tip the scales of future development towards multifamily and ensures that this area helps the city meet its housing goals and depress housing costs by increasing supply. The flexibility allowed with the “mixed use” designation also ensures the opportunity for the community to respond to future market conditions and changing city priorities over the 20-year lifespan of the proposed Comprehensive Plan and zoning changes. The mixed use designation will also allow continuation of existing retail and business uses allowing them to continue to operate during the time before redevelopment. When redevelopment does occur, the “mixed-use” designation is essential to the long-planned vision of this dynamic, sustainable, urban neighborhood of the future. “Live, Work, Play” is a recurring theme for the future of this area and the “mixed-use” designation is best suited to achieve that vision.

“Highrise” Density is Appropriate

A Highrise designation also sets the stage for the future zoning that is the appropriate density for proximity to transit and planned bike/pedestrian improvements including the ‘complete street’ along 120th (with bike lanes and separated sidewalks). Appropriate modulation requirements like floorplate limits and flexible step backs from major arterials could be incorporated into future zoning and land use code to ensure that this density is achieved in a manner that respects zone transitions and is aesthetically pleasing. Furthermore, the natural topography of the area minimizes any impact on single-family neighborhood views. Finally, the Highrise designation and associated future zoning would enable the density to be accommodated in towers with a smaller ground space footprint, allowing for the public spaces and green areas that the city desires proximate to Eastrail.

We appreciate the work that you do and the dedication you have shown towards making this city a better place for current and future residents. We believe that by following the staff recommendation for these areas you will be achieving your ultimate goal of producing more housing in Wilburton, and following the vision laid out by the Council and the Wilburton CAC meant to create this great future neighborhood.

Sincerely,

Doug Exworthy
TRF Pacific

Kendall Anderegg
Mutual Materials

Campbell Mathewson
Rack and Road

Neal Mulnick
Max Capital LLC

TJ Woosley
Brierwood Center

Bill Finkbeiner
Finkbeiner Building

Jon Roskill
Eragem Building

Kenny Dudunakis
Brierwood Apartments

Bob Griffith
The Pumphouse

March 27, 2024

Bellevue Planning Commission
planningcommission@bellevuewa.gov.

WILBURTON REZONE

Dear Commission Members:

When Wright Runstad & Company designed The Spring District, we strove to make a neighborhood that was vibrant, walkable, and leveraged light rail to create a true transit-oriented community. We are proud of the dynamic mix of office, retail and residential living that has been created.

We believe that the planning staff's recommendations for a Mixed-Use zone for the neighborhood to the south of us (shown on the attached map as areas 1 and 2) will build on the foundation laid by The Spring District and hope the Planning Commission concurs.

Thank you for your consideration and for the work you do for our community.

Sincerely,



Andy Bench
President

AB/jkh

Attachment

March 27, 2024

Bellevue Planning Commission
planningcommission@bellevuewa.gov.

WILBURTON REZONE

Dear Commission Members:

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Thank you for your consideration and for the work you do for our community.

Sincerely,



Andy Bench
President

AB/jkh

Attachment



March 27, 2024

Tharsis Law
Jacquie Quarre
425-891-7842
jacquie@tharsis.land

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

VIA EMAIL TO: PlanningCommission@bellevuewa.gov

Copy to: Thara Johnson, Comp Planning Manager
 Janet Shull AICP CUD, Strategic Planning Manager
 Justin Panganiban, AICP, Senior Urban Designer/Planner
 Nick Whipple, Code and Policy Director
 Caleb Miller, Senior Planner

Dear Planning Commission:

We represent Beta-Bellevue Auto Center, L.L.C. (“Beta-Bellevue”). Beta-Bellevue is the owner of property in the City of Bellevue’s Wilburton planning area, located at 620-638 116th Ave NE (“Beta-Bellevue Property”). The Beta-Bellevue Property is a lightly developed, approximately 134,000 SF parcel located less than 500 feet from the Sound Transit Wilburton Station.

We support the Wilburton Subarea policy updates that envision the Beta-Bellevue Property as high-density transit-oriented development and support the recommendation in the Staff Memo to not impose a minimum parking requirement for new developments in Wilburton. However, we have concerns regarding the following LUCA concepts proposed in the Staff Memo: (1) a 70-foot *minimum* width for Flexible Access; and (2) the effective “grid” through properties established by requiring access points every 250-feet and 500-feet across a block. These concepts inhibit the flexibility intended for Flexible Access and limit the ability of architects to design innovative projects that achieve the density and walkability that the City wants for

Wilburton. A one-size-fits-all approach to access does not make sense for making the most of a truly unique TOD opportunity in Wilburton.

Fortunately, the City has the opportunity to take a different course of action in developing the LUCA. An alternative to prescribing minimum Flexible Access widths and access locations is to develop design guidelines in the LUCA and design standards in the forthcoming update to the Transportation Design Manual that give architects and City Staff the ability to collaborate and design truly flexible access routes through new developments in the locations and at the scales appropriate for the specific project, modes of transportation, and location in Wilburton. This is more aligned with proposed Wilburton policy updates S-WI.57, S-WI.60, S-WI.65, S-WI.66, and S-WI.71, S-WI.73, S-WI.77 and S-WI.81. Incentives could also be used to encourage certain types of access or amenities that the City is interested in achieving through privately-owned but publicly accessible access.

We provide the following comments in response to the Staff Memo:

- **OPPOSE: Prescriptive 70-Foot Minimum Flexible Access and the Locations Identified in Attachment C.** There should not be a *minimum* width of 70 feet for Flexible Access as mentioned in the Staff Memo. We support allowing many different amenities in privately-owned Flexible Access (such as bike lines, landscaping, stormwater infrastructure, etc.). But these amenities are better planned for during the entitlement process for a specific proposal with known details. The location and the size and layout of Flexible Access are best identified during project entitlement, which is also more consistent with the proposed policy update S-WI.65, which states: “Require publicly accessible internal access corridors to facility mobility and livability *through development review*” (emphasis added). We understand from conversations with City Staff that the map in Attachment C to the Staff Memo is illustrative and is not intended to prescribe locations of Flexible Access or included in the Comprehensive Plan updates or Wilburton LUCA. We agree that the map should not be included to avoid confusion.
- Imposing a 70-foot *minimum* width for Flexible Access during this level of planning will create a variety of unintended consequences with health/safety ramifications:
 - Related to the Beta-Bellevue Property, the map in Attachment C identifies a conceptual 70-foot minimum access located running along the property’s northern boundary. This location is less than 120 feet away from the intersection of 116th Ave NE and NE 8th Street.
 - We have previously submitted to the City a Transpo Group Study that identifies issues with access near this busy intersection. Transpo Group recommended that access be determined in response to future development in the area – not preset.
 - A 70-foot minimum width will prevent the type of redevelopment that the City is hoping to achieve with the Wilburton subarea policy updates. A 70-foot minimum width is substantial – this is 20 feet wider than the 50-foot minimum width currently required for two lanes of traffic with parking strips on both sides.

- A 70-foot minimum width does not take into account the unique property circumstances. For example, on the Beta-Bellevue Property there is a sizable easement for the Sound Transit light rail. Requiring one or more Flexible Access areas through the Beta-Bellevue Property when added to the area of the Sound Transit easement could severely limit the options for redeveloping the Beta-Bellevue Property and make it difficult to achieve the highest-density TOD development that is appropriately envisioned for that property.
- *If Flexible Access is required*, which we advise against, there should be a provision in the LUCA that allows the location and width to be administratively reduced or redistributed to different locations throughout a redevelopment in the entitlement process. This approach is consistent with the City's proposed policies and will provide the flexibility that is needed to design projects that achieve the density and accessibility that the City is envisioning in a manner that is safe and feasible. However, it would be simpler to avoid the minimum-width requirement altogether.
- **OPPOSE: Required Access Points at 500-foot and 250-foot To Impose a Grid.** We are not opposed to creating walkable blocks, but this objective does not require imposing 500/250-foot access points, which will similarly result in unintended consequences. This approach has the effect of imposing a grid of access points in Wilburton that we and many others have repeatedly advised against in prior comments. Requiring access points at set intervals, instead of determining the appropriate locations based on the unique site and needs of the project, could prevent redevelopment of the uses and densities that the City wants to see. It may also create unsafe conditions and increase traffic problems near busy intersections, such 116th and NE 8th Street. As noted above, Transpo Group advised against a preset access grid and recommended that the number and location of access connections be based on future development needs.
 - *If the LUCA imposes this grid of 500-foot and 250-foot access points*, which we advise against, there should be a provision in the LUCA that allows the access points to be administratively revised throughout the entitlement process. This will provide the flexibility that is needed to design projects that achieve the density and accessibility that the City is envisioning. That said, it is simpler for applicants, architects, and City Staff alike to not have the rigid requirement imposed in the first place and avoid having to craft exceptions.
- **SUPPORT: No Minimum Parking Requirement in Wilburton.** We also wanted to note that we support City Staff's recommendation that there should be no minimum parking requirement for new development in Wilburton, especially for the redevelopment of the Beta-Bellevue Property 500 feet from the Sound Transit station. This will help achieve the types of TOD development that the City would like to see and have the benefits that Staff outline on page 6 of the Staff Memo.

We appreciate the time and thought that the Commission and City Staff have put into this process on an ambitious schedule and look forward to continuing to work with you as the process continues.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Quarre". The signature is fluid and cursive, with a prominent initial "J" and a final flourish.

Jacquie Quarre
Tharsis Law

MAX CAPITAL LLC & ALCO INVESTMENT CO
14510 NE 20TH STREET – SUITE 205
BELLEVUE, WA 98007

March 27, 2024

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

And to: Janet Shull, ACIP CUD Initiative Lead
City of Bellevue

Via email to PlanningCommission@bellevuewa.gov and WilburtonVision@bellevuewa.gov

Re: Draft Wilburton Vision Implementation Subarea Plan Policies

Dear Chair Bhargava and Ms. Shull,

We represent the ownership of the nearly 4.5-acre AutoNation Ford site located at 411 116th Avenue NE within the Wilburton TOD Area. We have been following the Wilburton Vision Implementation Subarea Plan process closely. We are looking forward to seeing the Land Use Code Amendments come forward soon. We understand your discussion this week will focus on recommendations to guide drafting the LUCA's transportation approach. We offer the following comments on the meeting materials:

1. **Removing Parking Minimums is the Right Approach.** We strongly support the staff recommendation to remove minimum parking stall ratios in the Wilburton TOD Area, along with the companion Wilburton Vision CPA Policy S-WI-36 to “[u]se appropriate vehicle and bicycle parking supply and requirements to reflect trail and transit proximity and access, and local access needs.”

The Area will be connected regionally with Light Rail and Eastrail and will be connected to Downtown with the Grand Connection, so it's likely that future residents and workers in the Area will rely less on single occupant vehicles. Removing parking ratios does not mean that parking will not be constructed. Indeed, it is often a lender requirement to show that there is adequate parking to serve a project as noted correctly in the staff memo. Removing minimum parking stall ratios will instead help facilitate the expected gradual transition from SOV use as property owners and developers will be able to “right size” parking to meet anticipated demand at the time of a project. We think this is the right outcome and approach for Wilburton.

2. **Concern With the 70' Minimum Standard for “Flexible Access” Streets.** The Agenda Materials also identify and describe “Flexible Access” streets as “active transportation and essential vehicular access (i.e., garage access, pick-up/drop-off) to support future development.” Such “Flexible Access” streets are intended to be 70' wide to adjacent building face. Of course new developments will require access, and we support a

14510 NE 20TH STREET – SUITE 205 BELLEVUE, WA 98007
PHONE: 425-746-1500

thoughtful approach to locating garage and service access where it is feasible and has the least impact on the public realm; however, we have misgivings about the need for 70' in width to accommodate garage and waste access. Typically access to garage and service areas in urban settings is from alleys that are no more than 20' wide. This width minimizes vehicular presence and the potential for vehicular and pedestrian conflicts. The City has said that the design for these areas would be governed by the specific needs of a project—yet it has also identified a specific minimum width—which signals that the “Flexible Access” concept is going beyond a project-specific analysis. If the City envisions more than just garage access in these areas, then we request more clarity about how these areas are intended to be used, and how the large width is justified by project impacts.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'NM', with a small dot above the second 'M'.

Neal Mulnick

Cc: Emil King, City of Bellevue
Abigail DeWeese, HCMP

From: [Barb Braun](#)
To: [PlanningCommission](#)
Subject: PC Comments Braun 03272024
Date: Wednesday, March 27, 2024 4:03:43 PM
Attachments: [PlanningComComments Braun -3202024.pdf](#)

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Here are my comments for tonight's meeting

Planning Commission Comments

March 27, 2024

Good Evening Commissioners,

Thank you for the opportunity to speak. My name is Barbara Braun. I am active in several citizen groups here in Bellevue including People For Climate Action, 300 Trees and Trees4Livability. I live in Bellevue and ran a business in Bellevue for 15 years. I am here tonight to comment on the Wilburton and Tree Code topics.

Wilburton/BelRed:

LUCA TOPIC AREA 1: TRANSPORTATION, STREETS, AND BLOCKS. In general, the policies are good and I support them. However, I suggest policies be added to address heat mitigation such as requiring streets, uncovered parking lots, and other large paved or roofed services to have a certain density of trees and other green coverage to reduce summer heating effects. I don't think S-WI-77 is sufficient.

On the Proposed Policy Amendments, page 18, items S-WI-42-49, I like the policy comments but don't think they are strong enough. For example, S-WI-42 Support the development of an environmentally resilient neighborhood through a sustainable district framework, code updates, and public-private partnerships.

I hope this means the City will adopt and require a strong, comprehensive sustainable district framework to guide appropriate development so that it's not optional. LEED For Neighborhood Development or LEED ND was discussed as a possible framework in the workshops the City held. The positives about LEED ND are:

1. Familiarity. Developers are used to working with LEED.
2. It's comprehensive.
3. It includes certification and verification which is needed and should not be optional for the developers.

Policies 43-49 need to be strengthened. I would like to see words such as "support," "encourage," "seek opportunities" be made into stronger requirements rather than suggested options.

- **Require Support** strategies for net-zero and net-positive development, including renewable energy, net-zero carbon emissions, and net-zero waste.
- Support, **incent** and pursue partnerships toward the development of a district energy system.
- Identify and **incent** opportunities to pilot low-carbon building design principles toward the reduction of embodied carbon and greenhouse gas emissions throughout the project life cycle.
- **Require Encourage** the use of innovative, sustainable design and construction methods toward green affordable housing.
- Promote and **require** sustainable mobility through integrated transportation and land use planning,

increased access to low carbon transportation options, and innovative technologies.

- **Require** Encourage improvements that enhance the aesthetic and functional qualities of natural features, such as Sturtevant Creek, Lake Bellevue, and the wetland at 116th Avenue NE and Main Street.
- **Require** Seek opportunities through the development process to expand green stormwater infrastructure, tree canopy, and landscaping that enhances ecological functions and urban wildlife habitat connectivity.

Tree LUCA:

I am very happy with the strong draft. The minimum tree density approach is brilliant and easy-to-understand. The residents of our city are excited to see action on this, and we hope you fully adopt the recommendations of the Planning Team.

That said, we will need to take additional steps to preserve tree canopy as our City densifies. While the last canopy assessment was positive, recent trends are accelerating canopy erosion, for example the significant highway expansions.

In addition to tree codes, the City should take further actions, in partnership with others, to protect existing trees and forests, and to build new canopy as we grow. For example, we could:

- Replace the trees along our highways.
- Implement a city-wide street tree program.
- Actively protect the remaining forested areas of Bellevue.
- Work with the School District to reforest school properties.
- Educate and incent landowners to plant more trees, especially native and drought tolerant trees.

Thank you for listening to community and for taking action. We are encouraged by the continued commitment to a sustainable future.

On a final note, I would like to take a minute to congratulate you on the appointment of Jonny Lu to the Commission. Jonny is a well-educated, well-informed Bellevue resident who is excited to take a leadership role in shaping our city's future. He understands the diverse set of priorities and issues we face, brings unique expertise to the table, and will bring a balanced perspective to the Commission. His appointment is a great addition. Congratulations.

Thank you,
Barb Braun
13609 SE 43rd Place

From: [John Darvish](#)
To: [PlanningCommission](#)
Subject: Fwd: Please disregard the earlier email. Wilburton Medical Mixed-Use
Date: Wednesday, March 27, 2024 8:10:45 PM
Attachments: [PastedGraphic-1.png](#)
[PastedGraphic-4.png](#)

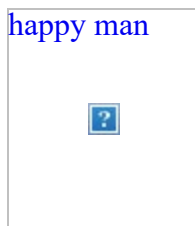
[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Thara,

I sent this email yesterday but I didn't see it included in the written communications. Can you please include it?

Thank you,

John



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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Begin forwarded message:

From: John Darvish <jdarvish@holistique.com>
Subject: **Please disregard the earlier email. Wilburton Medical Mixed-Use**
Date: March 26, 2024 at 5:35:48 PM PDT
To: Vishal Bhargava <VBhargava@bellevuewa.gov>, Negin Kanloo <khanloo.negin@gmail.com>, Luisa Cuellar-Calad <LFCalad@bellevuewa.gov>,Carolynn Ferris <CFerris@bellevuewa.gov>, Karol Brown <KBrown@bellevuewa.gov>, C Goeppelle <CGoeppelle@bellevuewa.gov>

Cc: Mo Malakoutian <mmalakoutian@bellevuewa.gov>, PlanningCommission@bellevuewa.gov

PLEASE DISREGARD earlier email. It was sent prematurely.

Dear Commissioners,

I hope you are well. I would like to thank you for all the care you have put into this critical planning phase for future of Bellevue. This is the city that we all love, want the best for it, and have shared in many ways. The diligence you have put in this process is amazing.

I would like to humbly recommend that Commissioners make a recommendation to eliminate Medical Office/Medical-Mixed-Use designation from the area across the street from Overlake Hospital. For the following reasons:

- Mixed-Use still supports medical use
- Troubled state of healthcare and hospitals in WA state
- Lack of need for Medical Office
- Proximity to light rail station
- Immediate need for housing
- Lopsided amount of prime land dedicated to Medical Office
- And finally, flexibility built in Mixed-Use designation.

Medical Mixed-Use with Focus on Medical is Another Way of Saying Medical Office

In a recent review of document named “Proposed Policy Amendments to Wilburton-NE 8th St”, on page 16 under the title: Wilburton Transit-Oriented Development (TOD) Area Vision, I found: (This statement is referring to the area across Overlake Hospital on 116th)

*Development along the future multimodal 116th Avenue corridor accommodates mixed-use development at a high-rise scale, with the area across from Overlake Medical Center including a **medical office mixed-use** focus that complements nearby hospitals and similar uses along 116th Avenue NE in BelRed to the north.*

This position is taken due to “complement nearby hospitals and similar use” No data is presented to support this position. This was clarified and confirmed after a quick correspondence with a planning staff. I believe the direction it is recommending is not following the recommendations commissioners made during the meeting of Feb. 28, 2024 and it does not support the data which I will present next.

Specifically during the following times on the video of Feb. 28t, commissioners repeatedly expressed their concern for overly prescribed medical office, reduction/removal of medical office designation, encouraging broadly-defined use, even asking for rethinking need for medical office, and finally distributed

medical service throughout the city: (1:02 Commissioner Brown), (1:06 Deputy Chair Goepple), (1:13 Commissioner Ferris), (1:13 Commissioner Khanloo), (1:15 Commissioner Brown), (1:49 Commissioner Brown), (1:52 Commissioner Ferris), (2:03 Deputy Chair Goepple), (2:04 Chair Bhargava), (2:34 Commissioner Ferris), (2:37 Commissioner Brown), (2:40 Commissioner Goepple).

The introduction of Medical Mixed-Use with focus on medical use is emphasizing medical rather residential. It is a compromise which does not take into account the immediate need for housing rather emphasized medical office again.

Let's take a closer look.

Mixed-use Still Supports Medical Office

Mixed-use designation still supports medical office use. If the need arises a medical office can be built to respond to the need. However, Medical office or Medical Mixed-use prohibits more meaningful development.

Unfavorable Healthcare Economy

According to WA State Hospital Association, Hospitals have lost 2.7 billion Dollars in 2022 alone, and 1.5 billion in the first half of 2023. They have continuously laid off staff, and cut services due to budget shortages. CEO of WA State Hospital Association said "Ongoing losses and basic hospital operations are unsustainable". Overlake and Children's hospitals are not immune from these unfortunate trends. This is specially not good news for expansion of medical services anytime soon in Wilburton area. How long will the recovery take? How long will the losses last? Is recovery guaranteed?

Lack of Need for Medical Office

No new medical office has been built outside of Overlake Hospital grounds for 40+ years.

Proximity to Light Rail Station

This area is between 1,000-2,000 feet to light rail station and is a prime location for TOD of residential nature

Over Committed Land for Medical Office

The land dedicated to Medical Office expands from NE 10th St to Northrup Ave. is overly optimistic of the anticipated medical needs. The following is a map of suggested medical office in the Wilburton area. Being in healthcare profession myself, I hope our citizens will never need this much healthcare in the next 20 years!



The areas committed to medical office north and South of Bel-Red

As the map suggests, the area north of Bel-Red road totals 2,600,000 Sqft (60 acres), at a modest FAR of 6, if fully developed, it will yield 15,600,000 Sqft of medical office. The area of south of Bel-Red 423,482 Sqft (9.7+ acres), it can yield, 2,541,000 Sqft of medical office.

In summary, current Sqft zoned as medical office in Wilburton is 3,000,000+ Sqft (70+ Acres) which can yield more than 18,000,000 Sqft of medical office. At this rate we can build a private hospital room for each resident of Bellevue, young and old!! (I have left medical institutions, Overlake and Children Hospitals, out of this study. It would be even more exaggerated had I included them!)

Lopsided commitment of land to Medical Office vs. Mixed-Use

Further review of Future Land Use Map (FLUM) one can compare, the area designated as Mixed-use between NE 10th Street and Main Street totals 2,535,222 Sqft vs Medical Office 3,000,000 Sqft. That is the difference of almost 500,000 Sqft more dedicated to Medical Office. Considering that one can still build medical offices in mixed-use zones, how much more is the the balance tilted towards medical office? One will wonder if this a fair division of land between Medical Office and Mixed-Use/Residential specially since we started this process to address the need for residential.



Comparing Sqft of land zoned MO vs MU on 116th Ave (not including Med. Inst.).

In Summary

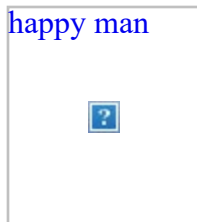
Given the troubled state of healthcare and hospitals in WA state, proximity to light rail station, immediate need for housing, lack of need for medical offices, lopsided amount of land dedicated to Medical Office, and flexibility built in Mixed-Use to accommodate medical office, I highly recommend eliminating medical office designation of any sort for the area across the street from the Overlake Hospital and assign simple Mixed-Use for this area. Mixed-use designation inside of TOD will accommodate medical use if and when it arises and allow for organic redevelopment of Wilburton area.

Finally, one would hope that the Planning Commission would address the lopsided division of prime land as a whole between Medical Office and Mixed-Use as a bigger challenge we are facing.

I am prepared to discuss and present more detailed data to support this recommendation.

Sincerely,

John Darvish



John Darvish

CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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Johnson, Thara

From: Bill Finkbeiner <billfinkbeiner@msn.com>
Sent: Friday, March 29, 2024 9:35 AM
To: PlanningCommission
Subject: written comments for 4/3 commission meeting
Attachments: Wright Runstead Wilburton Rezone Comments 3-27.pdf; Wilburton Rezone Comments 3-27.pdf

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Thara. If you could please the attachments in the written communication to the planning commission meeting for April 3 (no need to include the text of this email in written communication :)

Thank you for the work you do.

Bill

To: Planning Commission

We, the undersigned, urge you to agree with the planning department staff recommended changes shown in the Future Land Use Map for areas 1 and 2 on the attached map for “highrise mixed use” designations. These areas are both within the quarter mile walkshed of light rail stations, within a block of the Eastrail, adjacent to the only Rapid Ride Bus line on the Eastside of Lake Washington (running on NE 8th), within a quarter mile of the terminus of the Grand Connection and have easy access to I-405. The billions of dollars of multimodal investment these facilities represent were made with the intent of creating an urban area with high densities and a variety of future development.

“Mixed Use” Provides a Flexible Framework to Deliver Housing

The clear current focus, of both the market, and the city of Bellevue, is increased housing, and the “mixed use” FLUM designation allows for residential development. Incentives can also be included in the upcoming Land Use Code Amendments (LUCA) which further prioritize housing above other uses. The combination of incentives and market demand will tip the scales of future development towards multifamily and ensures that this area helps the city meet its housing goals and depress housing costs by increasing supply. The flexibility allowed with the “mixed use” designation also ensures the opportunity for the community to respond to future market conditions and changing city priorities over the 20-year lifespan of the proposed Comprehensive Plan and zoning changes. The mixed use designation will also allow continuation of existing retail and business uses allowing them to continue to operate during the time before redevelopment. When redevelopment does occur, the “mixed-use” designation is essential to the long-planned vision of this dynamic, sustainable, urban neighborhood of the future. “Live, Work, Play” is a recurring theme for the future of this area and the “mixed-use” designation is best suited to achieve that vision.

“Highrise” Density is Appropriate

A Highrise designation also sets the stage for the future zoning that is the appropriate density for proximity to transit and planned bike/pedestrian improvements including the ‘complete street’ along 120th (with bike lanes and separated sidewalks). Appropriate modulation requirements like floorplate limits and flexible step backs from major arterials could be incorporated into future zoning and land use code to ensure that this density is achieved in a manner that respects zone transitions and is aesthetically pleasing. Furthermore, the natural topography of the area minimizes any impact on single-family neighborhood views. Finally, the Highrise designation and associated future zoning would enable the density to be accommodated in towers with a smaller ground space footprint, allowing for the public spaces and green areas that the city desires proximate to Eastrail.

We appreciate the work that you do and the dedication you have shown towards making this city a better place for current and future residents. We believe that by following the staff recommendation for these areas you will be achieving your ultimate goal of producing more housing in Wilburton, and following the vision laid out by the Council and the Wilburton CAC meant to create this great future neighborhood.

Sincerely,

Doug Exworthy
TRF Pacific

Kendall Anderegg
Mutual Materials

Campbell Mathewson
Rack and Road

Neal Mulnick
Max Capital LLC

TJ Woosley
Brierwood Center

Bill Finkbeiner
Finkbeiner Building

Jon Roskill
Eragem Building

Kenny Dudunakis
Brierwood Apartments

Bob Griffith
The Pumphouse

Steve Kramer
KG Investment
Properties

Johnson, Thara

From: Kian <kiandbradley@gmail.com>
Sent: Friday, March 29, 2024 12:57 PM
To: PlanningCommission
Cc: Council
Subject: Parking requirements in Wilburton neighborhood

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Planning Commission (cc Bellevue City Council),

Please reconsider the onerous parking requirements that the Planning Commission is considering mandating for the Wilburton area. This area has abundant access to public transit and trails, is within walking distance of Downtown Bellevue and multiple grocery stores, and is on the route of the upcoming Bike Bellevue corridor.

Parking requirements add millions of dollars to projects- developers will need to build parking garages to accommodate the proposed requirements, which can cost \$50,000 per space or more. This cost is then passed on to renters and prospective homeowners in the form of increased housing costs.

I encourage you to take a look at the current academic research around parking requirements- <https://www.planetizen.com/features/113459-perils-central-planning-parking>. Abundant parking leads to increased driving, which leads to increased demand for parking, in a vicious cycle.

Consider allowing builders to decide how much parking is needed. Parking will still be built, but we should allow the market to decide the appropriate amount.

Thanks,
Kian Bradley

Johnson, Thara

From: Nick Ton <nichkt@gmail.com>
Sent: Friday, March 29, 2024 12:38 PM
To: PlanningCommission; Malakoutian, Mo; Robinson, Lynne
Subject: Disappointment

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

That's the word I have in my mind after the last Bellevue Planning Commission meeting where the Wilburton Subarea plan was reviewed.

The lack of self-awareness among the commission board members is astounding. Who are we planning this city for? How have we forgotten the vision of a "City in a park" in favor of a "City in a parking lot"? How can our commissioners not see that their attitudes are why young people aren't moving here and why those here are actively planning to move away?

We should not be planning the city for people who still mourn for the old downtown dairy queen. We should be planning for future needs and future wants rather than to try to bring back nostalgia from a time far gone.

To hear multiple commissioners passionately fight back against staff recommendation to eliminate parking requirements was disheartening. These regressives do not and should not represent our city. They should ask, why don't any staff below the age of 40 live in the city? They don't ask because they know the answer is themselves and their attitudes.

We are upgrading public transit. We've built light rail. We have a transit center, and we keep talking about making more pedestrian infrastructure. I see and applaud the efforts that city staff are making to try to create a city we all want to live in. I am disappointed that the people who represent the planning function in our city are trying to create a city that anyone would only want to drive through.

--

Nicholas Ton
602-550-8243
Nichkt@gmail.com

Johnson, Thara

From: Sander Valstar <sandervalstar@gmail.com>
Sent: Sunday, March 31, 2024 4:13 PM
To: PlanningCommission
Subject: Regarding eliminating minimum parking requirements for Wilburton Subarea

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear planning commission,

It was brought to my attention that several members of the commission are pushing back against staff recommendations to eliminate minimum parking requirements in the new Wilburton Subarea. I am emailing you in support of staff and am urging you to listen to their recommendations to eliminate parking minimums in this area. In the near future the Wilburton Subarea will be excellently connected by East-Link light rail and the East-Rail and Grand Connection bike paths. Developers and businesses should be given the freedom to decide on the appropriate amount of parking for this situation by themselves instead of being forced to work with a minimum mandated by the city. Please note that eliminating parking minimums does **not** mean "no parking" or "very little parking", it means "the right amount of parking for the situation" as determined by the developer.

Downsides of minimum parking mandates include the following:

1. They lead to ugly massive parking lots and garages that sit half empty
2. They reduce the housing capacity that can be added. Because space that could have been used for housing, now sits empty as unnecessary parking spaces.
3. They put businesses further apart than necessary, making walking and cycling impractical.
4. They increase the cost of development. This cost will be passed on to the businesses, which will reduce the viability of small local businesses.
5. They restrict the freedom of developers to build what creates the most value for the local situation.

If anything, I'd suggest you add parking maximums to prevent developers from creating massive parking lots that negatively impact the walkability of the general area. Let's make the Wilburton Subarea a place that is not only convenient to walk, ride, drive and take transit to, but is also inviting to walk around in.

Best,

Sander Valstar

Lives in Newport Hills, Bellevue and is looking forward to riding a bike to Wilburton on East-Rail.

Johnson, Thara

From: Jared Sager <jaredscottsager@gmail.com>
Sent: Tuesday, April 2, 2024 10:29 PM
To: PlanningCommission
Subject: Wilburton land use and comprehensive plan

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello!

I am a Bellevue resident, and it was brought to my attention that there is meeting tomorrow to discuss land use in Wilburton as well as housing components of the comprehensive plan.

So I am emailing to share my thoughts about the direction I would like to see the city take.

I am very excited to see our city create more mixed use, dense housing that is affordable and accessible by multimodal transportation.

I have heard some discussion about minimum parking requirements for Wilburton where the city may be on the hook to build and maintain parking infrastructure in the city for cars, and personally this doesn't make much sense. While cars will always be a piece of the transportation network, placing this minimum requirement is setting the city up to be locked into subsidising car dependency for many years down the line.

If we are committed to a sustainable city, then space and resources should be dedicated to making sure there is support for dense, economical, eco-friendly, and space efficient transportation options are robust enough to handle the expected growth.

Thank you,
Jared

Johnson, Thara

From: Kian <kiandbradley@gmail.com>
Sent: Tuesday, April 2, 2024 9:24 PM
To: PlanningCommission
Cc: Council
Subject: Don't allow homes next to freeways :(

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello Planning Commission (cc Council),

The current Comprehensive Plan proposal puts residential buildings right next to i-405. The plan shows the health risks by doing this- we should avoid it! Combustion engine emissions reduce life expectancy, so it doesn't make sense to put high-rise residential buildings next to freeways.

Also, please move forward with staff's recommendation to eliminate parking minimums in Wilburton. This area has abundant alternatives to driving (via the RapidRide, light rail, normal buses, Eastrail and soon Bike Bellevue's Wilburton route.) We should just let the market decide how much parking is needed. It'll still be built, but at a small, appropriate amount.

Finally, please allow more density in mixed-use centers. Small, neighborhood mixed-use centers like the Lake Hills commercial center make a lot of sense for this- if you allow more apartments within walking distance, you'll create housing that allows people to achieve most of their daily needs without driving, which contributes to a better sense of community and reduces the need for parking.

Thanks,
Kian Bradley

Johnson, Thara

From: Lara <laragarbage@gmail.com>
Sent: Tuesday, April 2, 2024 6:28 PM
To: PlanningCommission
Cc: Malakoutian, Mo
Subject: Wilburton future land use

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I am writing with several thoughts about future land use in Wilburton and the Comprehensive Plan update.



I need you to understand that mandatory parking minimums are directly related to how much housing we can accommodate and how affordable it will be.

Wilburton will be a trail and transit oriented development where new residents will be able to live car-free or car-light easily and comfortably. We are experiencing a housing and affordability crisis. It is so important that we take bold action NOW to take full advantage of the opportunity that redevelopment in places like Wilburton and BelRed present to address these critical problems.

The status quo is producing this crisis. To shift the status quo, we must make changes to how we are doing things. Parking reform is an easy way to see improvements with little to no negative impacts. Future-focused, progressive cities nationally are recognizing this and the results are paying dividends. A

growing Bellevue can learn from them and follow their lead!

Please look at this short Sightline article - [Unlock Middle Housing With Parking Reform](#)

See a map and details about the many American cities that are introducing parking reform - [The Parking Reform Network](#)

For a deep dive into how guidance for parking minimums is based on flimsy, made up rationale, check out [Parking Laws Are Strangling America](#) (30 min entertaining video)

And for even more, check out this resource-packed article from [Strong Towns](#)

My specific asks are the following:

- **Please follow staff's recommendation to eliminate minimum parking requirements in Wilburton**
- **Please do not allow residential buildings within 500 feet of highways**
- **Please allow more density in mixed use centers to include affordable and middle housing**
- **Please identify additional funding for affordable housing in the Comp Plan**
- **Please include mandatory inclusionary zoning in the Comp Plan**

Thank you,
Lara Gardner, Lake Hills

Planning Commission Comments

April 2, 2024

Good Evening Commissioners,

Thank you for the opportunity to speak. My name is Barbara Braun. I am here tonight to follow up on the Wilburton and Tree Code topics from last week.

Wilburton Parking Policy

There was a lot of discussion last week about parking. I believe the Planning Staff are correct and the Commission should support “no parking minimums.” If you look at Wilburton today, it’s a giant parking lot. There already are several parking garages, for example Best Buy, REI, and PCC complexes, and there are many very large parking lots. I encourage you to look for yourself. These could become pay lots in the future.

Wilburton is small. The majority will be within ¼ mile of public transit. There is ample parking nearby at South Bellevue Station Park & Ride and the Wilburton Park & Ride.

We will never reach our TOD vision for Wilburton if we continue to dedicate too much space to parking. If you disagree with the staff analysis, I suggest you study this in depth before making any decisions, so we are not doomed to over-investing in parking for years to come.

I agree that if additional parking is absolutely necessary, it should be provided on the periphery, say in the Spring District and it should be under grounded. Special parking provisions could be made for accessible parking or transport to the interior of the area.

Trees

There was a discussion to exempt BelRed and Wilburton from the tree canopy goals. I strongly disagree. Without tree canopy, these areas will be overly paved heat islands that are too hot in the summertime.

Someone suggested we require street trees. A well proven policy is to require all new or re development to install sidewalks and street trees. This can and should apply to both commercial and residential projects. Such a policy should be adopted for the entire city.

Someone suggested increasing the definition of a significant tree from 6 inches to 8 inches. I strongly disagree. Bellevue residents have been very vocal in their alarm with the number and rate of large tree destruction. Ecosystem services are provided by large trees not small ones. We need to retain our more mature trees.

I urge the Planning Commission to not be lulled into thinking we have reached our tree canopy goal. The recent canopy survey is based on 2021 data which is prior to recent large scale tree removal along the highways, along the PSE corridor, in Coal Creek, in Mercer Slough, etc. The remaining canopy we have needs to be retained.

On a final note, I would like to take a minute to congratulate you on the appointment of Jonny Lu to the Commission. Jonny is a well-educated, well-informed Bellevue resident who is excited to take a leadership role in shaping our city’s future. He understands the diverse set of priorities and issues we face, brings unique expertise to the table, and will bring a balanced perspective to the Commission. His appointment is a great addition. Congratulations.

Thank you,
Barb Braun
13609 SE 43rd Place

Johnson, Thara

From: Christina Huang <christinahuangji@gmail.com>
Sent: Wednesday, April 3, 2024 12:46 AM
To: PlanningCommission

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Planning Commission,

I'm Christina, I'm 23, and I live in downtown Bellevue.

Here are some asks that I'd like for you to consider for the good of our city.

Please do not allow residential building within 500 feet of freeways.

I support staff's recommendation to eliminate minimum parking requirements in Wilburton.

And the last one, please I'm BEGGING for this one!!!

Allow more density in mixed use centers to include affordable and middle housing.

Thank you,
Christina

--

Warmly,
Christina Huang

Johnson, Thara

From: Debbie Lacy <debbie@eastsideforall.org>
Sent: Wednesday, April 3, 2024 10:13 AM
To: PlanningCommission
Subject: input for land use, housing element

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Commissioners,

I'm writing on behalf of Eastside For All's community members and partners who hold quality, affordable housing as a top priority for Bellevue and East King County. Your leadership is needed at this critical time not only to ensure Bellevue meets its affordable housing goals, but that it does so in ways that are aligned with its commitments to *equity and environmental stewardship*.

I spoke last year to share concerns about the possibility of Bellevue allowing residential housing to be built close to freeways. I'm bringing that forward again as an important priority as part of our work to address systemic inequities, along with other requests aligned with our mission. Thank you for your consideration.

Prohibit residential building within 500 feet of freeways. [Bellevue's April 2023 Air Quality and Land Use Planning report](#) included recommendations to apply broadly to Bellevue's policy and planning processes. The first recommendation outlined is to "*Apply an equity lens during all planning processes for land use adjacent to high-volume roadways. This centers environmental justice and redresses the cumulative health impacts to people of color, low-income communities, and other historically underrepresented groups (e.g., who would benefit most from increasing residential capacity (sic) across the city, and who could potentially be harmed).*"

With the *established health risks* well documented in Bellevue's report, we ask Bellevue to take into account those risks and the disproportionate impact on populations who experience health and housing disparities.

Some mitigation approaches have been raised for the air quality problems near freeways, but the effectiveness of the possible strategies are *unproven*. They're also *costly* to implement and maintain in the long term. This isn't the way to establish quality, healthy affordable housing. *All Bellevue community members deserve healthy housing no matter where they live in the city.* Please don't gamble with people's health. Prohibit residential building within 500 feet of high volume roadways; leave those areas to commercial building and focus on the design challenge at hand to build housing away from freeways. It's entirely feasible; Bellevue has the expertise needed to design for healthy *and* affordable housing.

Outline plans for mandatory inclusionary zoning in the Comprehensive Plan Update. While the specific percentages and other directives can be part of other processes and functional plans, it's important for the Comp Plan to provide *clear, strong guidance* when there is an upzone. These requirements are necessary to ensure homes for our low to moderate wage earners and to create the inclusive community Bellevue strives for. We're concerned that without this direction in the Comp Plan, the opportunity to ensure a minimum of affordable housing units in up-zoned areas will be lost.

Identify additional funding for affordable housing in the Comp Plan Update. Given that thousands of affordable housing units are needed in Bellevue, with the majority at 50% AMI or below, lack of adequate funding is a critical barrier. Bellevue should take the opportunity to identify local sources of funding which can make it possible for new developments to be competitive in applying for additional state and federal resources. Please set Bellevue up for success to reach its affordable housing goals.

Eliminate minimum parking requirements in Wilburton. We support staff's recommendation and hope you will consider this as an important part of Bellevue's approach to increase affordable housing. With the Wilburton light rail station and the high cost of owning multiple cars per household, it's important to plan for the amount of parking that will actually be needed rather than decreasing opportunities for more affordable housing units. More unnecessary parking means more expensive housing.

Allow more density in mixed use centers to include affordable and middle housing. As shared in the Preferred Alternative, this will give Bellevue the means to reach the middle housing requirements issued by WA State. (Again, please ensure that housing is not built in close proximity to high volume freeways.)

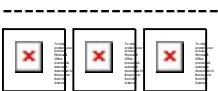
Bellevue and other cities are far behind when it comes to the amount of affordable housing needed. Bold planning is needed to change the course. The solutions above reflect the needs and hopes of people who are at risk of displacement, and many who have never been able to afford to live in Bellevue despite working here as teachers, social workers, city government staff, healthcare providers, restaurant and hotel workers, and many others.

Thank you for centering alternatives and policies that support housing affordability at a range of income levels. We believe the Preferred Alternative provides for the future that Bellevue envisions.

Thank you for your leadership,
Debbie



Debbie Lacy, she/her, Founder/Executive Director
425-209-0895



Standing together - check out our [Advocacy Hub](#) for information and calls to action

An existing example of Mixed-use with Medical Office (Virginia Mason) on 116 Ave. NE and NE 4th

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This approach emphasizes the position staff has taken, “**Medical Office or nothing**”.

We should encourage medical offices and life science developers/companies to do their due diligence and plan for their future growth. We cannot do it for them. One such organization that had the foresight to forecast their needs is Health Care Realty. In the 2018 they acquired a large parcel of land across from the hospital to develop another Medical Office when the need arises. What is stopping other large organizations from doing the same?

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Now, let's make a few observations from **Attachment D**. This document is in the center of why staff have made this recommendation. The document is broken into three parts: Medical Office Demand, Life Science Lab Space Demand, and Major Medical Institution Space Demand. I will address each in the that order. But first a general comment.

The numbers presented in the study, all except one, 70,000 additional residents from Growth Management Act, are not based on public/private studies, US Census, general knowledge, public consensus, etc. It is based on internal conversations or private conversations. Staff could not share any of their sources with me. I do not question the conversations but even a single published stud?

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- Building one more Overlake Medical Pavilion, even for a reputable REIT company such as Healthcare Realty Trust (HRT) is very risky. It requires enormous upfront investment with prolonged periods without meaningful returns, takes a long time to lease up, no demand present, Speculative development, build it and hope they come.

- But these large MOB's also create their own eco-system. Large MOB's monopolize the Medical Office market and keep the lease rates high. As a result, many medical establishments won't be able to afford. While a brand new medical office looks great, and adds to the skyline it prices out many smaller clinics such family practices as is shown in the current mix of tenants in Overlake Medical Pavilion.

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Green area indicates Medical office zoning in Wilburton, which adds to 3,000,000 Sqft, not counting medical institutions, Overlake and Children's.

North of Bel-Red Road on 116th alone offers 2.6 million Sqft. of land to build Medical Office. It can possibly accommodate up to 16,000,000 Sqft of medical office alone. Will that be sufficient to fulfill anticipated Medical Office/Lab Sciences needs? Please keep in mind, we are only asking to designate the area south of Bel-Red to Mixed-use not north. However, one might wonder why not.

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Attachment D suggests the proximity to the hospital will spurn Life Sciences to co-locate near it, then it contradicts itself in the next sentence. According to Attachment D, Colombia Pacific Partners, “a private equity investment firm based in Toronto, Canada who seeks to invest in innovation-driven companies”, and Alexandria, “a leading owner, operator, and developer of collaborative mega campuses for life science companies”, both have chosen to develop Life Science campuses in **Bel-Red corridor** 2 miles away from the hospital! They also seem to disagree.

Alexandria has acquired a site in Bel-Red which would like to develop an 800,000 Sqft life science campus. The staff is hoping to convince them to relocate to Wilburton by not accommodating the building code to necessary for Life Sciences. So far they have not been successful.

We approached Alexandria a few weeks ago to see if they were interested in developing life sciences in BR-MO, and their response was they are solely focusing on their development in Bel-Red! They have done their due diligence already.

FYI, there are 162 Life Science companies in Washington, big and small. Only seven are located in Bellevue, none closer than a mile to the hospital. Bothell, with no hospitals or a defined medical corridor, Bothell hosts the lion's share of labs on the Eastside with 22 and has well established itself on the Eastside as a Life Science center. 115 life science companies are located in Seattle with many located within the proximity of Lake Union. The rest are scattered in Federal Way, Lynnwood, Redmond, Bainbridge Island, Spokane, Vancouver and few others. There are no hospitals in the vicinity of majority of these. If there are, it could very well be unintentional! We should ask ourselves how **Bothell, with no clear medical pedigree**, has established itself as a life science magnet? **Fred Hutch Cancer Center** (a research institute, not a hospital) is the catalyst for attracting Life Sciences in **Lake Union**. What can Bellevue learn from this?

“Life sciences industry consists of companies operating in the fields of pharmaceuticals, biotechnology, medical

devices, biomedical technologies, nutraceuticals, cosmeceuticals, food processing, and others that dedicate their efforts to creating products to improve the lives of organisms.” While hospitals are taking care of day-to-day healthcare of citizens: emergency room, childbirth, surgeries, labs, X-rays, pharmacies etc. The overlap is minimal at best. Even during clinical trials, when the two come together, they are always conducted away from the hospitals in specialized settings to preserve impartiality.

Major Medical Institution Space Demand

- Attachment D states a large medical institution was looking to build a campus on a 5-12 acre property in Bellevue. It is impossible to find a contiguous piece of land that large, specially in Bellevue. They will have better luck in Redmond or Woodinville. Given the density of Wilburton it is not likely they will be able to find a parcel that large. Like any other business looking for a large parcels in dense urban area, one will have start by assembling diligently and consistently parcel by parcel with tenacity and generosity.

- Attachment D suggests Medical Institutions (I am guessing Overlake and Children’s) may need Medical Institution space between 0-1,000,000 Sqft (again no source was given for this estimate) in the next 20 years. Let’s look at Overlake first and then Children’s.

- Overlake has several old buildings, “woody walkups”, which are drastically under-utilized and some that are well past their useful life. It also has two parking garages, on and off campus. These opportunities on and off its campus give the hospital ample opportunity to meet its possible future Medical Institution requirements. The areas are marked with green rectangles offer these future re-development opportunities.

Green areas represent opportunities for redevelopment. Blue boxes indicate parking garages which can be consolidated.

- Given current economic conditions of hospitals in WA, and as whole in United States, the unprecedented losses will delay any thoughts of expansion. The planning staff also agreed with this.
- Furthermore, in the past, Overlake Hospital like many other prudent organizations, have moved their non-essential operations, such as administrative offices, off campus to a less expensive quarters therefore creating more space for higher priority needs. This option will certainly reduce the need for medical institution to be located on campus.
- In the mid 2000's, Overlake Hospital allowed Healthcare Realty Trust to build a 460,000 Sqft MOB, on its campus named Overlake Medical Pavilion. This clearly indicates they did/do not foresee the need for Medical Institution and decided to share their campus with others.

Overlake Medical Pavilion on Overlake Hospital campus

- History has shown Overlake adds a new wing every 16-22 years. It last added a wing in Jan. 2023. If history is any indication, the earliest major addition will be in 2040 or later. However, it has continuously added satellite clinics to reach patients in their own neighborhoods which I believe is a great strategy for decentralizing medical services, reducing traffic, and keeping the costs manageable.

Example of satellite Overlake clinic

The latest wing Overlake Hospital opened in 2023.

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Summary and conclusion

In the past we have made decisions that in hindsight were not the best. But to commit them again makes them worse. The planning staff has not put forward a compelling reason for designating the area across the street from Overlake Hospital to Medical Office. It is prepared to wait another 20 years to see if the experiment will succeed. The data presented is speculative and has not been substantiated or verified. The conclusions drawn also are not supported by the premises, general observations, or state of economy. It creates a vision that is hard to imagine.

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- Mixed-Use still supports medical use
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- Lack of demand for Medical Office while excess inventory still exists.
- Proximity to light rail station.

- Immediate need for housing.
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- And finally, flexibility built in Mixed-Use designation.

I leave it up you to make your own decision.

Sincerely,

John Darvish



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CFO

Holistique Medical Center

Desk: 206-321-2202 Fax: 425-462-8919

Address: 1200 116th Ave NE Suite C. Bellevue, WA – 98004

Web: holistique.com Email: jdarvish@holistique.com

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Dear Planning Commissioners,

The planning staff has created another packet for your review after the meeting on Feb. 28, 2024. In attachment C: Staff Recommended Future Land Use Map for Wilburton TOD Area, staff has recommended high rise Medical Office for the area across from Overlake Hospital. I am surprised that despite multiple unanimous recommendations by all commissioners during the Feb. 28 meeting to reduce/eliminate/redo the Medical Office zoning, planning staff is still insisting on designating this area as Medical Office with no change.

Nevertheless, I still believe this area should be zoned as Mixed-use. I will offer a few insights into the consequences of this recommendations and then discuss Attachment D: “Demand for Medical Office Space in Bellevue” in more detail since their recommendation is solely relies on this document.

First, let’s make a few observations and consequences of this recommendation.

- Mixed-use still support Medical Office and allows for organic, market-driven, “supply-and-demand” based growth. Why use the prohibitive designation of Medical Office to force a use that has no proven demand?
- I truly believe that by designating Mixed-Use for this area, **it can accommodate goals set forth by the planning staff.** They are not mutually exclusive. The numbers below will show us why.
- To make matters worse, the same policy allows Medical Office to be built in Mixed-use. This puts the area across the street from the hospital, in fact all Medical Office zones, in a double jeopardy. First, it must contend with no demand for medical office, next it is getting “robbed” by mixed-use. This puts the Medical Office development across from the hospital at a sever disadvantage. One is led to believe the goal is to force very specific use for a specific user for the land across the Hospital. This is akin to **City of Renton** halting all development because **Boeing** may put up another airplane factory and they will need land to accommodate them. All the while, Boeing is trying to fix its bottom line and transferring jobs to other states.
- This is a perfect example of mixed-use scenario. Virginia Mason opened Medical Pavilion in Wilburton Village located at 116th Ave NE and NE 4th Street. The clinic is located in a mixed-use development which consists of grocery store, bank, fast food, restaurant, FedEx, Target, **AND** a large medical office. Imagine the traffic created by this.



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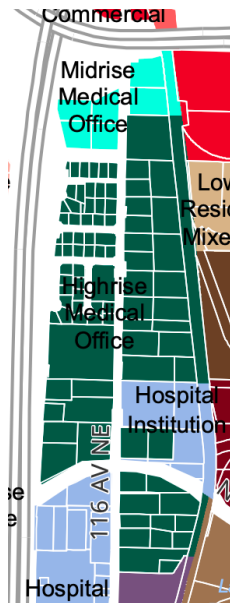
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G1 GARAGE →

OVERLAKE CLINICS

PRIMARY CARE

URGENT CARE





Virginia Mason

Virginia Mason



PC
COMMUNITY
MARKETS

WILBUR'S CAFE

WILBUR'S CAFE



Johnson, Thara

From: kyle@sosufamily.net
Sent: Wednesday, April 3, 2024 10:03 AM
To: PlanningCommission
Subject: Comprehensive Plan Updates

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I was disappointed to hear that the commission has doubts about Staff's recommendation to eliminate parking requirements in the Wilburton area. I hope that you will re-consider, and remove parking requirements in this area. This area is near light rail, bus lines, and current and future bike paths. *People will live here without cars.* In fact, 1 in 12 households in Bellevue *today* don't have a car. Developers will perform their own analysis, and will determine how much parking they need based on the target market for their projects. Having parking minimums stifles innovation in building design, and makes housing projects more expensive. Parking garages can cost \$80,000 or more per space. Furthermore, King County's Right Size Parking report from 2015 found that multi-family developments in the County had a 40% oversupply of parking, meaning this expensive requirement is consistently overbuilt, usually due to minimum requirements.

I would also ask the planning commission to consider the following:

- Disallow residential buildings within 500 feet of highways. Bellevue city documents already establish the health risks associated with living next to highways, and how these risks disproportionately impact vulnerable people. If this is somehow totally untenable, mitigation factors must be put in place for residents.
- Support affordable housing by identifying additional funding sources, implementing mandatory inclusionary zoning (or pay in lieu), and through other strategies.
- Increase density in mixed use centers.
- Allow for more mixed use throughout the city, such as by allowing corner stores or "front yard businesses", especially as middle housing is implemented. Bringing services closer to housing will reduce car traffic pressure and create more vibrant communities.

Thank you for your time and diligence.
Kyle Sullivan

Dear Planning Commissioners,

The planning staff has created another packet for your review after the meeting on Feb. 28, 2024. In attachment C: Staff Recommended Future Land Use Map for Wilburton TOD Area, staff has recommended high rise Medical Office for the area across from Overlake Hospital. I am surprised that despite multiple unanimous recommendations by all commissioners during the Feb. 28 meeting to reduce/eliminate/redo the Medical Office zoning, planning staff is still insisting on designating this area as Medical Office with no change.

Nevertheless, I still believe this area should be zoned as Mixed-use. I will offer a few insights into the consequences of this recommendations and then discuss Attachment D: “Demand for Medical Office Space in Bellevue” in more detail since their recommendation is solely relies on this document.

First, let’s make a few observations and consequences of this recommendation.

- Mixed-use still support Medical Office and allows for organic, market-driven, “supply-and-demand” based growth. Why use the prohibitive designation of Medical Office to force a use that has no proven demand?
- I truly believe that by designating Mixed-Use for this area, **it can accommodate goals set forth by the planning staff.** They are not mutually exclusive. The numbers below will show us why.
- To make matters worse, the same policy allows Medical Office to be built in Mixed-use. This puts the area across the street from the hospital, in fact all Medical Office zones, in a double jeopardy. First, it must contend with no demand for medical office, next it is getting “robbed” by mixed-use. This puts the Medical Office development across from the hospital at a sever disadvantage. One is led to believe the goal is to force very specific use for a specific user for the land across the Hospital. This is akin to **City of Renton** halting all development because **Boeing** may put up another airplane factory and they will need land to accommodate them. All the while, Boeing is trying to fix its bottom line and transferring jobs to other states.
- This is a perfect example of mixed-use scenario. Virginia Mason opened Medical Pavilion in Wilburton Village located at 116th Ave NE and NE 4th Street. The clinic is located in a mixed-use development which consists of grocery store, bank, fast food, restaurant, FedEx, Target, **AND** a large medical office. Imagine the traffic created by this.



An existing example of Mixed-use with Medical Office (Virginia Mason) on 116 Ave. NE and NE 4th

- Talking to staff they agreed that allowing Medical Office in Mixed-use will dilute the need for Medical Office, but they offered no solution/alternative.
- During a meeting with the Planning staff, it was stated that they are willing to disregard the historical data and push Medical Office policy through one more time despite its failures in the past. And according to one of the staff, they are **willing to continue with BR-MO even if it means for the next 20 years there will be no new development!** I was shocked to hear that.
- This approach emphasizes the position staff has taken, “**Medical Office or nothing**”.
- We should encourage medical offices and life science developers/companies to do their due diligence and plan for their future growth. We cannot do it for them. One such organization that had the foresight to forecast their needs is Health Care Realty. In the 2018 they acquired a large parcel of land across from the hospital to develop another Medical Office when the need arises. What is stopping other large organizations from doing the same?

Attachment D falls short of presenting a compelling argument for Medical Office

Now, let’s make a few observations from **Attachment D**. This document is in the center of why staff have made this recommendation. The document is broken into three parts: Medical Office Demand, Life Science Lab Space Demand, and Major Medical Institution Space Demand. I will address each in the that order. But first a general comment.

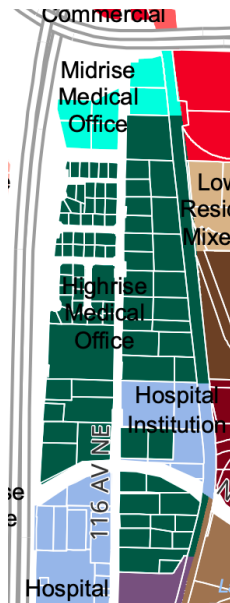
The numbers presented in the study, all except one, 70,000 additional residents from Growth Management Act, are not based on public/private studies, US Census, general knowledge, public consensus, etc. It is based on internal conversations or private conversations. Staff could not share any of their sources with me. I do not question the conversations but even a single published stud?

- Attachment D starts by stating the regional appeal for Overlake Hospital and its unique role in providing medical services to “... *Issaquah, Sammamish, Redmond, Kirkland, Mercer Island, Newcastle, and 8 other smaller communities.*” While this is a true statement, Overlake is not alone. So do Evergreen in Kirkland, Swedish in Issaquah, UW Medical Center in University of WA, Harborview, Swedish Seattle, Virginia Mason/Providence, Group Health in many locations, Valley Medical Center, Children’s in Laurelhurst, and a plethora of other smaller hospitals. Many factors go into why one would choose one hospital over the other. Proximity is not usually a top driving reason.

Medical Office Demand

- The estimated 1.1 Million Sqft of Medical Office (no source provided) is for the **entire city of Bellevue, not just Wilburton**. The staff don't know what is Wilburton's portion.
- On top of page 2 in Attachment D a graph shows inventory of Medical Office vs. population of Bellevue. Inventory jumped from 2,000,000 to 2,500,000 Sqft in 2012 and has remained steady. This coincided with the opening of a 460,000 Sqft medical office, Overlake Medical Pavilion. It suggests Based on the same chart, we will need another 500,000 Sqft medical office when Bellevue's population reaches 180,000. At the current annual increase of .32% it will be in 2064. There are two ways of satisfying the need for Medical Office. In one big MOB development which comes about every 15-20 years, or in a gradual way as the need dictates.
- The report also predicts Bellevue will grow by as many as 70,000 by 2044 and all the subsequent conclusions are based on this. That can be considered ambitious to say the least. To achieve this, we must grow at the annual rate of 2%, almost 7 times the expected growth rate of .32%. Since 2014 we have added 17,000 people. For a city that is eager to grow by as many as 70,000 by 2044, it should take advantage of every opportunity to create housing at a high rate. I think it will be easier to annex Kirkland.
- Building one more Overlake Medical Pavilion, even for a reputable REIT company such as Healthcare Realty Trust (HRT) is very risky. It requires enormous upfront investment with prolonged periods without meaningful returns, takes a long time to lease up, no demand present, Speculative development, build it and hope they come.
- But these large MOB's also create their own eco-system. Large MOB's monopolize the Medical Office market and keep the lease rates high. As a result, many medical establishments won't be able to afford. While a brand new medical office looks great, and adds to the skyline it prices out many smaller clinics such family practices as is shown in the current mix of tenants in Overlake Medical Pavilion.
- The data in attachment D states the need for up to 1,100,000 Sqft for medical office and at least 800,000 Sqft for life sciences for the next 20 years. It is safe to say half of 1.1 Million can be attributed to Wilburton alone. The entire medical office land reserved in FLUM exceeds 3,000,000 Sqft. At the modest FAR of 6, this much land can potentially deliver 18,000,000 Sqft of medical office/life science. We know that not everything will be

developed, but even one tenth will be more than enough. What are we going to do with the rest of the capacity? Mixed-use can accommodate this estimate in a balanced and predictable way.



Green area indicates Medical office zoning in Wilburton, which adds to 3,000,000 Sqft, not counting medical institutions, Overlake and Children's.

- North of Bel-Red Road on 116th alone offers 2.6 million Sqft. of land to build Medical Office. It can possibly accommodate up to 16,000,000 Sqft of medical office alone. Will that be sufficient to fulfill anticipated Medical Office/Lab Sciences needs? Please keep in mind, we are only asking to designate the area south of Bel-Red to Mixed-use not north. However, one might wonder why not.

Life Science Lab Space Demand

- Attachment D suggests the proximity to the hospital will spurn Life Sciences to co-locate near it, then it contradicts itself in the next sentence. According to Attachment D, Colombia Pacific Partners, “a private equity investment firm based in Toronto, Canada who seeks to invest in innovation-driven companies”, and Alexandria, “a leading owner, operator, and developer of collaborative mega campuses for life science companies”, both have chosen to develop Life Science campuses in **Bel-Red corridor** 2 miles away from the hospital! They also seem to disagree.
- Alexandria has acquired a site in Bel-Red which would like to develop an 800,000 Sqft life science campus. The staff is hoping to convince them to relocate to Wilburton by not accommodating the building code to necessary for Life Sciences. So far they have not been successful.

- We approached Alexandria a few weeks ago to see if they were interested in developing life sciences in BR-MO, and their response was they are solely focusing on their development in Bel-Red! They have done their due diligence already.
- FYI, there are 162 Life Science companies in Washington, big and small. Only seven are located in Bellevue, none closer than a mile to the hospital. Bothell, with no hospitals or a defined medical corridor, Bothell hosts the lion's share of labs on the Eastside with 22 and has well established itself on the Eastside as a Life Science center. 115 life science companies are located in Seattle with many located within the proximity of Lake Union. The rest are scattered in Federal Way, Lynnwood, Redmond, Bainbridge Island, Spokane, Vancouver and few others. There are no hospitals in the vicinity of majority of these. If there are, it could very well be unintentional! We should ask ourselves how **Bothell, with no clear medical pedigree**, has established itself as a life science magnet? **Fred Hutch Cancer Center** (a research institute, not a hospital) is the catalyst for attracting Life Sciences in **Lake Union**. What can Bellevue learn from this?
- *"Life sciences industry consists of companies operating in the fields of pharmaceuticals, biotechnology, medical devices, biomedical technologies, nutraceuticals, cosmeceuticals, food processing, and others that dedicate their efforts to creating products to improve the lives of organisms."* While hospitals are taking care of day-to-day healthcare of citizens: emergency room, childbirth, surgeries, labs, X-rays, pharmacies etc. The overlap is minimal at best. Even during clinical trials, when the two come together, they are always conducted away from the hospitals in specialized settings to preserve impartiality.

Major Medical Institution Space Demand

- Attachment D states a large medical institution was looking to build a campus on a 5-12 acre property in Bellevue. It is impossible to find a contiguous piece of land that large, specially in Bellevue. They will have better luck in Redmond or Woodinville. Given the density of Wilburton it is not likely they will be able to find a parcel that large. Like any other business looking for a large parcels in dense urban area, one will have start by assembling diligently and consistently parcel by parcel with tenacity and generosity.
- Attachment D suggests Medical Institutions (I am guessing Overlake and Children's) may need Medical Institution space between 0-1,000,000 Sqft (again no source was given for this estimate) in the next 20 years. Let's look at Overlake first and then Children's.
- Overlake has several old buildings, "woody walkups", which are drastically under-utilized and some that are well past their useful life. It also has two parking garages, on and off campus. These opportunities on and off its campus give the hospital ample opportunity to

meet its possible future Medical Institution requirements. The areas are marked with green rectangles offer these future re-development opportunities.



Green areas represent opportunities for redevelopment. Blue boxes indicate parking garages which can be consolidated.

- Given current economic conditions of hospitals in WA, and as whole in United States, the unprecedented losses will delay any thoughts of expansion. The planning staff also agreed with this.
- Furthermore, in the past, Overlake Hospital like many other prudent organizations, have moved their non-essential operations, such as administrative offices, off campus to a less expensive quarters therefore creating more space for higher priority needs. This option will certainly reduce the need for medical institution to be located on campus.
- In the mid 2000's, Overlake Hospital allowed Healthcare Realty Trust to build a 460,000 Sqft MOB, on its campus named Overlake Medical Pavilion. This clearly indicates they did/do not foresee the need for Medical Institution and decided to share their campus with others.



Overlake Medical Pavilion on Overlake Hospital campus

- History has shown Overlake adds a new wing every 16-22 years. It last added a wing in Jan. 2023. If history is any indication, the earliest major addition will be in 2040 or later. However, it has continuously added satellite clinics to reach patients in their own neighborhoods which I believe is a great strategy for decentralizing medical services, reducing traffic, and keeping the costs manageable.



Example of satellite Overlake clinic



The latest wing Overlake Hospital opened in 2023.

- In case of Children's Hospital deciding to expend, wouldn't it make sense for them to expand next to their existing campus on the north side of Bel-Red Road? Plenty of old medical offices surround the area which will accommodate this expansion. Again given the economic situation of hospitals, that will probably not happen anytime soon.

Summary and conclusion

In the past we have made decisions that in hindsight were not the best. But to commit them again makes them worse. The planning staff has not put forward a compelling reason for designating the area across the street from Overlake Hospital to Medical Office. It is prepared to wait another 20 years to see if the experiment will succeed. The data presented is speculative and has not been substantiated or verified. The conclusions drawn also are not supported by the premises, general observations, or state of economy. It creates a vision that is hard to imagine.

While any one of the points mentioned above is enough reasoning, together they present an overwhelming support for this area to be zoned Mixed-Use. Based on the following reasons we make this recommendation:

- Mixed-Use still supports medical use
- Assigning mixed-use to area across from the hospital, still meets the achieves the vision of planning staff.
- Life sciences have shown repeatedly they prefer Bel-Red, Bothell, or Lake Union, not near a hospital over Wilburton.
- Troubled state of healthcare and hospitals in WA state makes expansion unlikely.
- Medical Institution needs if and when arise have solutions: by looking within or forecasting.
- Lack of demand for Medical Office while excess inventory still exists.
- Proximity to light rail station.
- Immediate need for housing.
- Lopsided amount of prime land dedicated to Medical Office and not enough to Mixed-Use.
- And finally, flexibility built in Mixed-Use designation.

I leave it up you to make your own decision.

Sincerely,

John Darvish

Johnson, Thara

From: Mohamed Bakr <mbakr@muslimcna.org>
Sent: Wednesday, April 3, 2024 6:15 AM
To: PlanningCommission
Subject: Bellevue Planning Commission Request

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Commissioners,

Muslim Community Network Association, MCNA's community members and partners hold quality, affordable housing as a top priority for Bellevue and East King County. Your leadership is needed at this critical time not only to ensure Bellevue meets its affordable housing goals, but that it does so in ways that are aligned with its commitments to *equity and environmental stewardship*.

Please do not allow residential building within 500 feet of freeways. [Bellevue's April 2023 Air Quality and Land Use Planning report](#) included recommendations to apply broadly to Bellevue's policy and planning processes. The first recommendation outlined is to "*Apply an equity lens during all planning processes for land use adjacent to high-volume roadways. This centers environmental justice and redresses the cumulative health impacts to people of color, low-income communities, and other historically underrepresented groups (e.g., who would benefit most from increasing residential capacity (sic) across the city, and who could potentially be harmed).*"

With the established health risks well documented in Bellevue's report, we ask Bellevue to take into account those risks and the disproportionate impact on populations who experience health and housing disparities.

There have been some suggestions about mitigation for the air quality problems near freeways, but the effectiveness of the possible strategies are *unproven*. They're also *costly* to implement and maintain in the long term. This isn't the way to establish quality, healthy affordable housing. *All Bellevue community members deserve healthy housing no matter where they live in the city.* Please don't gamble with people's health. Prohibit residential building within 500 feet of high volume roadways; leave those areas to commercial building and focus on the design challenge at hand to build housing away from freeways. It's entirely feasible; Bellevue has the expertise needed to design for healthy *and* affordable housing.

Include mandatory inclusionary zoning in the Comprehensive Plan Update. It's important for the plan to provide clear, strong guidance when there is an upzone. These requirements are necessary to ensure homes for our low to moderate wage earners and to create the inclusive community Bellevue strives for.

Identify additional funding for affordable housing in the Comp Plan Update. Given that thousands of affordable housing units are needed in Bellevue, with the majority at 50% AMI or below, lack of adequate funding is a critical barrier. Bellevue should take the opportunity to identify local sources of funding which can make it possible for new developments to be competitive in applying for

additional state and federal resources. Please set Bellevue up for success to reach its affordable housing goals.

We support staff's recommendation to eliminate minimum parking requirements in Wilburton.

With the Wilburton light rail station and the high cost of owning multiple cars per household, it's important to plan for the amount of parking that will actually be needed rather than decreasing opportunities for more affordable housing units. More unnecessary parking means more expensive housing. Let's go forward in Bellevue instead of backward.

Allow more density in mixed use centers to include affordable and middle housing. As shared in the Preferred Alternative, this will give Bellevue the means to reach the middle housing requirements issued by WA State.

Bellevue and other cities are far behind when it comes to the amount of affordable housing needed. Bold plans are needed to change the course. The solutions above reflect the needs and hopes of people who are at risk of displacement, and many who have never been able to afford to live in Bellevue despite working here as teachers, social workers, city government staff, healthcare providers, restaurant and hotel workers, and many others.

Thank you for centering alternatives and policies that support housing affordability at a range of income levels. We believe the Preferred Alternative provides for the future that Bellevue envisions.

Salam (Peace)
Mohamed Bakr
MCNA Executive Director

MCNA advocates for equity through advocacy, civic engagement, and education, empowering the Muslim community in Bellevue and the Eastside. MCNA is committed to fostering unity and understanding, upholding the rights and dignity of all.

Please include me as a party of record.

My name is Phyllis White. I am a resident of the Wilburton BelRed subarea. Thank you for the opportunity to comment on the City of Bellevue's Wilburton Vision Implementation Comprehensive Plan Amendments.

The natural environment in our Wilburton subarea plays a crucial role in providing a profound sense of well-being. Wilburton residents are dedicated to protecting, restoring, and enhancing the livability of Wilburton, including the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout our Wilburton neighborhood where 90% of its impervious surfaces are on private land. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score and its Oxygen levels, a "Poor" rating score.

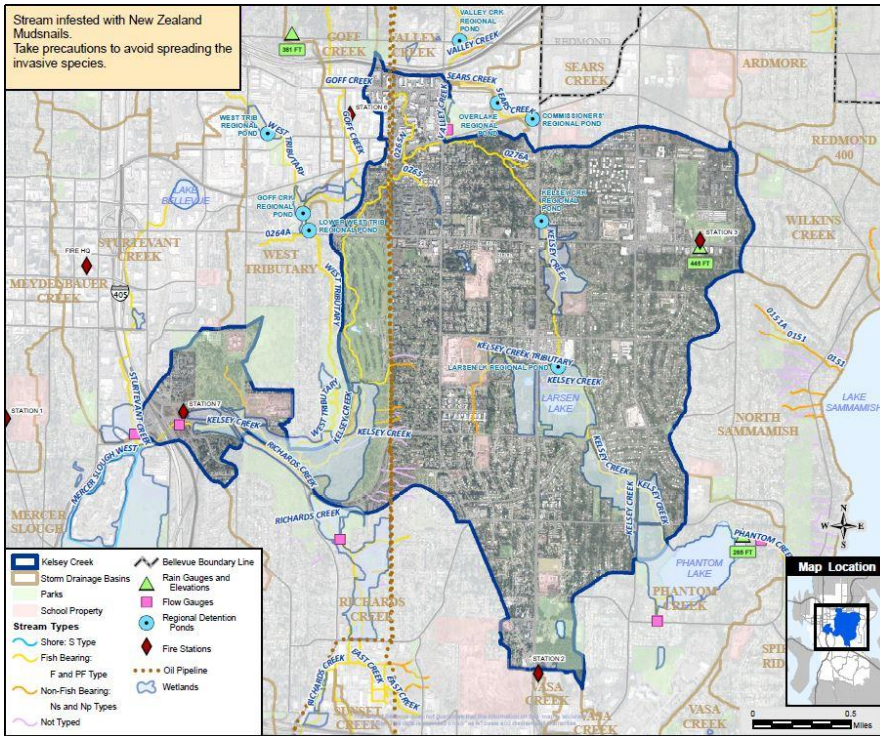
As a resident of Wilburton, I am writing for your consideration to support our request to preserve one of the few remaining residential areas in our city where riparian corridors are preserved and fostered in our Wilburton neighborhood when addressing future development in our residential subarea.

This also falls in line with the Transit-Oriented Development (TOD) Vision in support of open space and natural systems, and to continue to foster the Comprehensive Plan's Natural Determinants policies:

- S-WI-16 Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin
- S-WI-17 Prevent development from intruding into the floodplain of Kelsey Creek and the Goff Creek.

I am also advocating for the implementation of further measures to ensure the preservation and restoration of the ecological integrity of Wilburton's riparian areas and its surrounding wildlife habitat. Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds all living near a source of water and century old trees. Therefore, I am also advocating for the implementation of further measures to protect the preservation, restoration and integrity of the ecological system surrounding Wilburton's streams, marshlands, the trees, plant life, and wildlife habitat.

Regarding the proposed LUCA for tree canopy protection, I am happy to see the recommended 40% tree canopy protection. I recommend additional steps to preserve tree canopies by defining and protecting "significant trees" and "landmark trees" and offering procedures for inspections and also penalties for noncompliance.



Kelsey Creek Drainage Details (City of Bellevue)

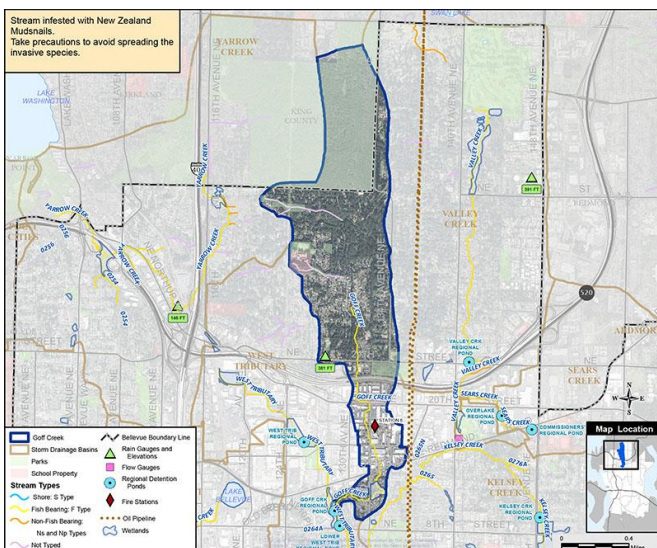
Salmon Present in the Basin

- **Chinook*+**
- **Coho+**
- **Sockeye**
- **Cutthroat Trout**

* Listed Federal Endangered Species

+ City Species of Local Importance (Bellevue Land Use Code 20.25H.150A)

Kelsey Creek Basin Drainage Details – City of Bellevue. City of Bellevue (1), the Goff Creek Basin Fact Sheet, and the Kelsey Creek Basin Fact Sheet. (reference)



GOFF Creek – (City of Bellevue)

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the priority species Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds, and in **Goff Creek, the threatened species Bull Trout.**

Here are a few photos of wildlife and landmark trees in our cul-de-sac and neighboring streets. The majority of the trees in our subarea are significant and landmark trees.



Red-tailed Hawk on neighbor's roof in Wilburton



Another Hawk on neighbor's Tree.



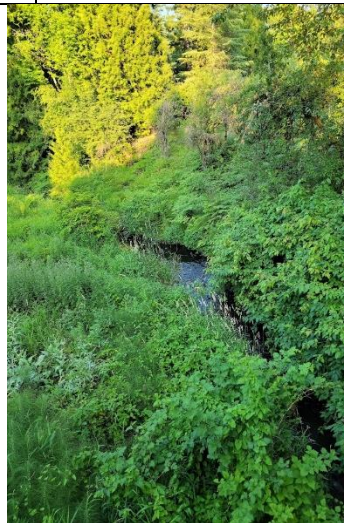
Great Blue Heron, a Priority Species.



Bobcat on Neighbor's Fence



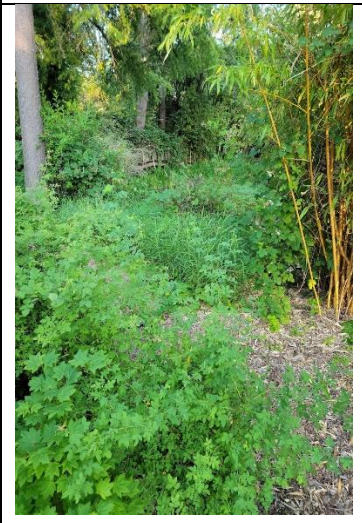
A Bald Eagle flying over neighbor's roof.



Kelsey Creek on our street yesterday. Chinook (endangered species), Coho, and Sockeye salmon spawn in Kelsey Creek.



Kelsey Creek in our neighbor's yard was unusually dirty last summer.



Marsh land under a bridge in a neighboring street on 132nd.

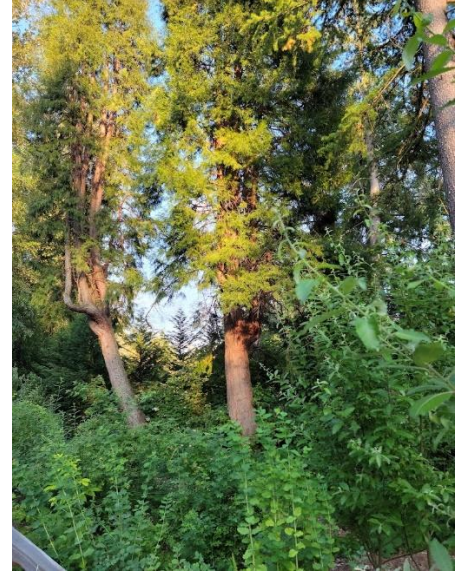
These are areas designated for R-Suburban, with single-family, duplexes, and cottage housing. Areas with marshland and streams surrounded by century old tree canopies should remain low density housing and with less impervious surfaces.



Tall Firs in Wilburton across of Bel-Red. Homes surrounded by landmark trees.



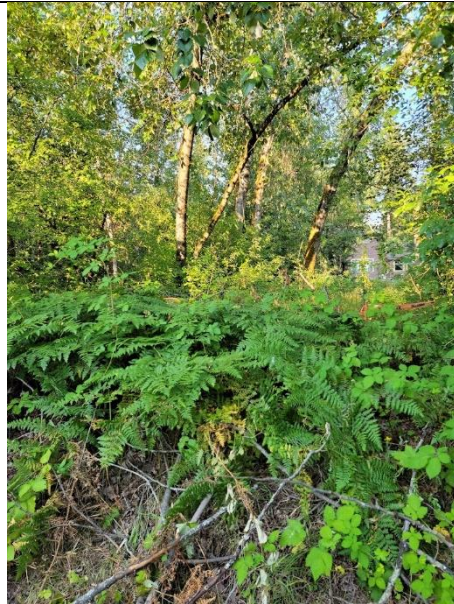
Goff Creek on 132nd where Cutthroat Trout live.



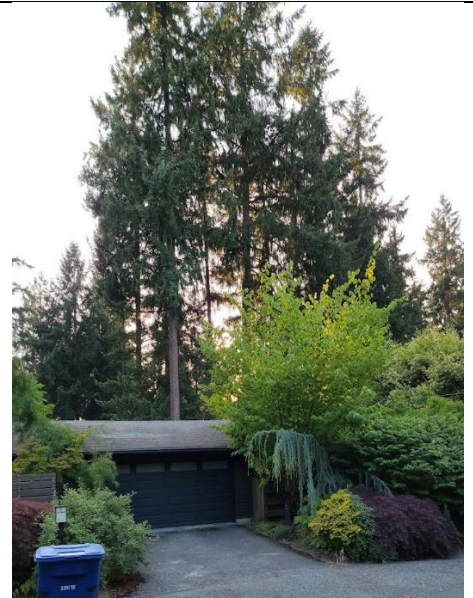
A backyard of a Wilburton home.



Another back yard of a Wilburton home.



Wilburton home (behind the trees) surrounded by marshland.



Homes in Wilburton, another example of the surrounding ecosystem which includes Goff Creek and Kelsey Creek.

Young trees cannot make up for the tall trees providing cooler temperatures and shade for wildlife and streams.

https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/Kelsey_AR_Executive_Summary.pdf

“The land cover in the Greater Kelsey Creek Watershed is typical of urban watersheds with a lower percentage of tree canopy and higher percentage of impervious surface ...Within Bellevue, ownership of the riparian corridor across all of the subbasins within the Greater Kelsey Creek Watershed is approximately 90 percent private property and 10 percent publicly owned (primarily parks).”

“Factors that Limit the Health of the Greater Kelsey Creek Watershed

1. **Pollutant Loading:** Stormwater runoff from impervious surfaces includes road runoff, pollutants, contribute to the worsening habitat water quality for fish and wildlife.
2. **Stormwater Runoff from Effective Impervious Surfaces:** The City’s flow control for new development has shown not to be effective at protecting streams from erosion.
3. **Road Culverts and Other Physical Barriers:** A number of physical barriers including undocumented barriers on private properties preventing fish passage for spawning and/or rearing have been identified in all the streams of the Greater Kelsey Creek Watershed.
4. **Loss of Floodplain and Riparian Function:** Urban development has confined and reduced the natural occurrence of wood entering many of the stream reaches in the Watershed. *Tree canopies are becoming largely concentrated in parks reducing floodplain storage. This is leading to high velocities and flowrates.*
5. **Take proactive measures to minimize costs:** The City has invested tens of millions of dollars in the Greater Kelsey Creek Watershed over the past 15 years on in-stream projects that include repairing stormwater outfalls, stabilizing stream slopes, removing fish passage barriers, catching and removing fine sediment, and improving conveyance.

Thank you for your consideration,

Phyllis White

Wilburton Resident

1. <https://bellevuewa.gov/city-government/departments/utilities/conservation-and-the-environment/drainage-basins/kelsey-creek-basin-drainage-details>
2. [Climate change: Trees 'most effective solution' for warming - BBC News](#)

To: Planning Commission

We, the undersigned, urge you to agree with the planning department staff recommended changes shown in the Future Land Use Map for areas 1 and 2 on the attached map for “highrise mixed use” designations. These areas are both within the quarter mile walkshed of light rail stations, within a block of the Eastrail, adjacent to the only Rapid Ride Bus line on the Eastside of Lake Washington (running on NE 8th), within a quarter mile of the terminus of the Grand Connection and have easy access to I-405. The billions of dollars of multimodal investment these facilities represent were made with the intent of creating an urban area with high densities and a variety of future development.

“Mixed Use” Provides a Flexible Framework to Deliver Housing

The clear current focus, of both the market, and the city of Bellevue, is increased housing, and the “mixed use” FLUM designation allows for residential development. Incentives can also be included in the upcoming Land Use Code Amendments (LUCA) which further prioritize housing above other uses. The combination of incentives and market demand will tip the scales of future development towards multifamily and ensures that this area helps the city meet its housing goals and depress housing costs by increasing supply. The flexibility allowed with the “mixed use” designation also ensures the opportunity for the community to respond to future market conditions and changing city priorities over the 20-year lifespan of the proposed Comprehensive Plan and zoning changes. The mixed use designation will also allow continuation of existing retail and business uses allowing them to continue to operate during the time before redevelopment. When redevelopment does occur, the “mixed-use” designation is essential to the long-planned vision of this dynamic, sustainable, urban neighborhood of the future. “Live, Work, Play” is a recurring theme for the future of this area and the “mixed-use” designation is best suited to achieve that vision.

“Highrise” Density is Appropriate

A Highrise designation also sets the stage for the future zoning that is the appropriate density for proximity to transit and planned bike/pedestrian improvements including the ‘complete street’ along 120th (with bike lanes and separated sidewalks). Appropriate modulation requirements like floorplate limits and flexible step backs from major arterials could be incorporated into future zoning and land use code to ensure that this density is achieved in a manner that respects zone transitions and is aesthetically pleasing. Furthermore, the natural topography of the area minimizes any impact on single-family neighborhood views. Finally, the Highrise designation and associated future zoning would enable the density to be accommodated in towers with a smaller ground space footprint, allowing for the public spaces and green areas that the city desires proximate to Eastrail.

We appreciate the work that you do and the dedication you have shown towards making this city a better place for current and future residents. We believe that by following the staff recommendation for these areas you will be achieving your ultimate goal of producing more housing in Wilburton, and following the vision laid out by the Council and the Wilburton CAC meant to create this great future neighborhood.

Sincerely,

Doug Exworthy
TRF Pacific

Kendall Anderegg
Mutual Materials

Campbell Mathewson
Rack and Road

Neal Mulnick
Max Capital LLC

TJ Woosley
Brierwood Center

Bill Finkbeiner
Finkbeiner Building

Jon Roskill
Eragem Building

Kenny Dudunakis
Brierwood Apartments

Bob Griffith
The Pumphouse

Steve Kramer
KG Investment
Properties

March 27, 2024

Bellevue Planning Commission
planningcommission@bellevuewa.gov.

WILBURTON REZONE

Dear Commission Members:

When Wright Runstad & Company designed The Spring District, we strove to make a neighborhood that was vibrant, walkable, and leveraged light rail to create a true transit-oriented community. We are proud of the dynamic mix of office, retail and residential living that has been created.

We believe that the planning staff's recommendations for a Mixed-Use zone for the neighborhood to the south of us (shown on the attached map as areas 1 and 2) will build on the foundation laid by The Spring District and hope the Planning Commission concurs.

Thank you for your consideration and for the work you do for our community.

Sincerely,



Andy Bench
President

AB/jkh

Attachment

