



Development Services Department
Environmental Coordinator
450 110th Avenue NE
Bellevue, WA 98009-9012

DETERMINATION OF NON-SIGNIFICANCE

PROPOSAL NAME:	Co-Living Housing Land Use Code Amendment (LUCA)
LOCATION:	City-Wide
FILE NUMBERS:	25-105068-AD
PROPONENT:	Charlie Engel
DESCRIPTION OF PROPOSAL: A Land Use Code Amendment to comply with the recent state legislation House Bill 1998 to allow for the development of co-living housing as a permitted use on any lot that allows for at least six (6) multifamily residential units, including lots zoned for mixed-use development. Co-living housing is intended to encourage inexpensive housing choices through the development of individually rented, lockable sleeping units that include living and sleeping spaces with shared kitchen facilities. Other commonly used terms that refer to co-living housing can include, but are not limited to, congregate living facilities, single room occupancy, rooming house, boarding house, lodging house and residential suites.	

The Environmental Coordinator of the City of Bellevue has determined that this proposal does not have a probable significant adverse impact upon the environment. A Final Environmental Impact Statement (FEIS) was conducted under the 2024 update to the Comprehensive Plan. This decision was made after the Bellevue Environmental Coordinator reviewed the completed environmental checklist and information filed with the Land Use Division of the Development Services Department. This information is available to the public on request.

This DNS is issued after using the DNS process in WAC 197-11-340. There is a minimum 14-day comment period on the DNS. This DNS is only appealable as part of the City Council's action on the land use code amendment. In order to comply with requirements of SEPA and the State of Washington Growth Management Act for coordination of hearings, any appeal of the SEPA threshold determination herein will be considered by the Growth Management Hearings Board along with an appeal of the City Council's action.

DATE ISSUED: November 12, 2025

MINIMUM COMMENT PERIOD ENDS: November 26, 2025

This DNS may be withdrawn at any time if the proposal is modified so as to have significant adverse environmental impacts; if there is significant new information indicating a proposals probable significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project); or if the DNS was procured by misrepresentation or lack of material disclosure.

Issued By: Reilly Pittman
Reilly Pittman, Environmental Coordinator
Development Services Department

Dated: November 12, 2025



SEPA Environmental Checklist

The City of Bellevue uses this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions

The checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully and to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions.

You may respond with "Not Applicable" or "Does Not Apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies and reports. Please make complete and accurate answers to these questions to the best of your ability in order to avoid delays. For assistance, see [SEPA Checklist Guidance](#) on the Washington State Department of Ecology website.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The city may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Background

1. Name of proposed project, if applicable Co-Living Housing LUCA
2. Name of applicant City of Bellevue, Development Services Dept., Code & Policy Division
3. Contact person Charlie Engel, Associate Planner Phone 425-452-6164
4. Contact person address 450 110th Ave NE, Bellevue, WA 98004
5. Date this checklist was prepared 10/02/2025
6. Agency requesting the checklist City of Bellevue

7. Proposed timing or schedule (including phasing, if applicable)

LUCA is anticipated to be adopted December 2025.

8. Do you have any plans for future additions, expansion or further activity related to or connected with this proposal? If yes, explain.

No.

9. List any environmental information you know about that has been prepared or will be prepared, that is directly related to this proposal.

None.

10. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

11. List any government approvals or permits that will be needed for your proposal, if known.

City Council adoption of the LUCA by ordinance (a Process IV City Council Legislative Decision).

12. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

A Land Use Code Amendment encouraging inexpensive housing choices through legalizing co-living housing as a permitted use to comply with House Bill 1998. State law requires that we allow for Co-Living Housing in all Land Use Districts that permit six or more units per lot.

13. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and the section, township and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

All amended requirements and standards will apply citywide.

Environmental Elements

Earth

1. General description of the site:

- ☐ Flat
- ☐ Rolling
- ☐ Hilly
- ☐ Steep Slopes
- ☐ Mountainous
- ☒ Other Various terrain features within the city boundaries.

2. What is the steepest slope on the site (approximate percent slope)? N/A - nonproject action

3. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

This is a non-project action. Specific soil types at any project site will be identified during project-level environmental review when appropriate.

4. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

This is a non-project action. Any unstable soils at any project site will be identified during project-level environmental review where appropriate.

5. Describe the purpose, type, total area and approximate quantities and total affected area of any filling, excavation and grading proposed. Indicate the source of the fill.

This is a non-project action. Any filling, excavation, and grading at any project site will be identified during project-level environmental review when appropriate.

6. Could erosion occur as a result of clearing, construction or use? If so, generally describe.

N/A - no clearing, construction, or use proposed as a part of this non-project action.

7. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? N/A - Non-project action.

8. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

No measures to reduce erosion impacts are proposed.

Air

1. What types of emissions to the air would result from the proposal during construction, operation and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This is a non-project action. Any emissions to the air resulting from construction, operation, and maintenance at any project site will be identified during project-level environmental review when appropriate.

2. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

This is a non-project action. Any off-site sources of emissions or odor that may affect any project site will be identified during project-level environmental review when appropriate.

3. Proposed measures to reduce or control emissions or other impacts to air, if any.

No measures to reduce or control emissions or air impacts are proposed.

Water

1. Surface Water

- a. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

This is a non-project action. Surface water bodies found at any project site will be identified during project-level environmental review.

- b. Will the project require any work over, in or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

The proposed non-project action is legislative and does not include any development activity.

- c. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of the fill material.

This is a non-project action. Any fill or dredge material placed in or removed from any project site will be identified during project-level environmental review when appropriate.

- d. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose and approximate quantities, if known.

This is a non-project action. Any surface water withdrawals or diversions from any project site will be identified during project-level environmental review when appropriate.

- e. Does the proposal lie within a 100-year floodplain? N/A - legislative action
If so, note the location on the site plan.

- f. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

This is a non-project action. Any discharges of waste materials to surface waters at any project site will be identified during project-level environmental review when appropriate.

2. Ground Water

- a. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

This is a non-project action. Any groundwater withdrawals at any project site will be identified during project-level environmental review when appropriate.

- b. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This is a non-project action. Any waste material discharged from any project site will be identified during project-level environmental review when appropriate.

3. Water Runoff (including stormwater)

- a. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This is a non-project action. Sources of runoff from any project site will be identified during project-level environmental review when appropriate.

- b. Could waste materials enter ground or surface waters? If so, generally describe.

This is a non-project action. The potential for waste materials to enter ground or surface waters from any project site will be identified during project-level environmental review when appropriate.

- c. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

This is a non-project action. Drainage patterns of any project site will be identified during project-level environmental review when appropriate.

Indicate any proposed measures to reduce or control surface, ground and runoff water, and drainage pattern impacts, if any.

No measures to reduce or control surface, ground, and runoff water are proposed.

Plants

1. Check the types of vegetation found on the site:

- ☐ deciduous tree: alder, maple, aspen, other _____
- ☐ evergreen tree: fir, cedar, pine, other _____
- ☐ shrubs
- ☐ grass
- ☐ pasture
- ☐ crop or grain
- ☐ orchards, vineyards or other permanent crops
- ☐ wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other _____
- ☐ water plants: water lily eelgrass, milfoil, other _____
- ☐ other types of vegetation _____

2. What kind and amount of vegetation will be removed or altered?

This is a non-project action. Any vegetation removal on or near any project site will be identified during project-level environmental review when appropriate.

3. List any threatened and endangered species known to be on or near the site.

This is a non-project action. Any threatened or endangered species found on or near any project site will be identified during project-level environmental review when appropriate.

4. Proposed landscaping, use of native plants or other measures to preserve or enhance vegetation on the site, if any.

This is a non-project action. Proposed landscaping for any project site will be identified during project-level environmental review when appropriate.

5. List all noxious weeds and invasive species known to be on or near the site.

This is a non-project action. Any noxious weeds and invasive species on or near any project site will be identified during project-level environmental review when appropriate.

Animals

1. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:

Birds: ☐hawk, ☐heron, ☐eagle, ☐songbirds, ☐other _____

Mammals: ☐deer, ☐bear, ☐elk, ☐beaver, ☐other _____

Fish: ☐bass, ☐salmon, ☐trout, ☐herring, ☐shellfish, ☐other _____

2. List any threatened and endangered species known to be on or near the site.

This is a non-project action. Any threatened or endangered species found on or near any project site will be identified during project-level environmental review when appropriate.

3. Is the site part of a migration route? If so, explain.

This is a non-project action. Any project site that is part of a migration route will be identified during project-level environmental review.

4. Proposed measures to preserve or enhance wildlife, if any.

No measures to preserve or enhance wildlife are proposed.

5. List any invasive animal species known to be on or near the site.

This is a non-project action. Any invasive animal species found at any project site will be identified during project-level environmental review.

Energy and Natural Resources

1. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

This is a non-project action. The kinds of energy used to meet any project's energy needs will be identified during project-level environmental review.

2. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

This is a non-project action. Any impacts to the potential use of solar energy by any project will be identified during project-level environmental review.

3. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

No measures to reduce or control energy impacts are proposed.

Environmental Health

1. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill or hazardous waste, that could occur as a result of this proposal? If so, describe.

This is a non-project action. Any environmental health hazards that could occur as a result of a project will be identified during project-level environmental review when appropriate.

- a. Describe any known or possible contamination at the site from present or past uses.

This is a non-project action. Any known or possible contamination found at any project site will be identified during project-level environmental review when appropriate.

- b. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

This is a non-project action. Any existing hazardous chemicals/conditions that might affect any project's development and design will be identified during project-level environmental review.

- c. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

This is a non-project action. Any toxic or hazardous chemicals that might be stored, used, or produced during any project's development, construction, or operation will be identified during project-level environmental review.

- d. Describe special emergency services that might be required.

This is a non-project action. Any special emergency services required by any project will be identified during project-level environmental review.

- e. Proposed measures to reduce or control environmental health hazards, if any.

No measures to reduce or control environmental health hazards are proposed.

2. Noise

- a. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

This is a non-project action. Any noises existing in the area of any project site will be identified during project-level environmental review when appropriate.

- b. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)?
Indicate what hours noise would come from the site.

This is a non-project action. Any noise created by or associated with any project will be identified during project-level environmental review.

- c. Proposed measures to reduce or control noise impacts, if any.

No measures to reduce or control noise impacts are proposed.

Land and Shoreline Uses

1. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

This is a non-project action. The current use of any project site and adjacent properties will be identified during project-level environmental review.

2. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to non-farm or non-forest use?

This is a non-project action. Any working farmlands or working forest lands associated with any project site will be identified during project-level environmental review.

- a. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling and harvesting? If so, how?

N/A

3. Describe any structures on the site.

This is a non-project action. Any structures found at any project site will be identified during project-level environmental review.

4. Will any structures be demolished? If so, what?

This is a non-project action. Any structures demolished on any project site will be identified during project-level environmental review when appropriate.

5. What is the current zoning classification of the site? N/A

6. What is the current comprehensive plan designation of the site? N/A

7. If applicable, what is the current shoreline master program designation of the site?

This is a non-project action. The current shoreline master program designation of any project site will be identified during project-level environmental review.

8. Has any part of the site been classified as a critical area by the city or county? If so, specify.

This is a non-project action. Any critical areas present on any project site will be identified during project-level environmental review when appropriate.

9. Approximately how many people would reside or work in the completed project? N/A

10. Approximately how many people would the completed project displace? N/A

11. Proposed measures to avoid or reduce displacement impacts, if any.

No measures to avoid or reduce displacement impacts are proposed.

12. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

None.

13. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any.

No measures to ensure compatibility with nearby agricultural and forest lands are proposed.

Housing

1. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

This is a non-project action. No housing units will be provided with the proposal. Any provision of housing will be identified during project-level environmental review as appropriate.

2. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

This is a non-project action. No housing units would be eliminated with the proposal. Any removal of housing units will be identified during project-level environmental review as appropriate.

3. Proposed measures to reduce or control housing impacts, if any.

No measures to reduce or control housing impacts are proposed. Any impacts and required or proposed measures to housing impacts will be identified during project-level environmental review as appropriate.

Aesthetics

1. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

This is a non-project action. There are no proposed structures included.

2. What views in the immediate vicinity would be altered or obstructed?

This is a non-project action. Any views in the immediate vicinity that would be altered or obstructed will be identified during project-level environmental review.

3. Proposed measures to reduce or control aesthetic impacts, if any

No measures to reduce or control aesthetic impacts are proposed.

Light and Glare

1. What type of light or glare will the proposal produce? What time of day would it mainly occur?

This is a non-project action. Any light or glare will be identified during project-level environmental review when appropriate.

2. Could light or glare from the finished project be a safety hazard or interfere with views?

This is a non-project action. Any light or glare that could be a safety hazard or interfere with views will be identified during project-level environmental review.

3. What existing off-site sources of light or glare may affect your proposal?

This is a non-project action. Any existing off-site sources of light or glare affecting any project will be identified during project-level environmental review.

4. Proposed measures to reduce or control light and glare impacts, if any.

No measures to reduce or control light and glare impacts are proposed.

Recreation

1. What designated and informal recreational opportunities are in the immediate vicinity?

This is a non-project action. Any recreational opportunities in the immediate vicinity of any project site will be identified during project-level environmental review.

2. Would the proposed project displace any existing recreational uses? If so, describe.

This is a non-project action. Any existing recreational uses displaced by any project will be identified during project-level environmental review.

3. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.

No measures to reduce or control recreation impacts are proposed.

Historic and Cultural Preservation

1. Are there any buildings, structures or sites located on or near the site that are over 45 years old listed in or eligible for listing in national, state or local preservation registers located on or near the site? If so, specifically describe.

This is a non-project action. Any buildings, structures, or sites located on or near any project site that are over 45 years old will be identified during project-level environmental review when appropriate.

2. Are there any landmarks, features or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

This is a non-project action. Any evidence of Indian or historic use or occupation on any project site will be identified during project-level environmental review.

3. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

This is a non-project action. Any methods to assess potential impacts associated with any project will be identified during project-level environmental review.

4. Proposed measures to avoid, minimize or compensate for loss, changes to and disturbance to resources. Please include plans for the above and any permits that may be required.

No measures to reduce or control resource impacts are proposed.

Transportation

1. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

This is a non-project action. Specific public streets and highways serving any project site will be identified during project-level environmental review.

2. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

This is a non-project action. Specific public transit serving any project site will be identified during project-level environmental review.

3. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

This is a non-project action. Any additional or eliminated parking spaces will be identified during project-level environmental review.

4. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

This is a non-project action. Any required new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities will be identified during project-level environmental review.

5. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe.

This is a non-project action. Specific transportation use associated with any project will be identified during project-level environmental review.

6. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

This is a non-project action. Vehicular trips generated per day will be identified during project-level environmental review.

7. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

This is a non-project action. Specific impacts to the movement of agricultural and forest produces associated with any projects will be identified during project-level environmental review.

8. Proposed measures to reduce or control transportation impacts, if any.

No measures to reduce or control transportation impacts are proposed.

Public Service

1. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

This is a non-project action. Specific impacts to public service needs associated with any project will be identified during project-level environmental review.

2. Proposed measures to reduce or control direct impacts on public services, if any.

No measures to reduce or control public service impacts are proposed.

Utilities

1. Check the utilities currently available at the site:

- ☐ Electricity
- ☐ natural gas
- ☐ water
- ☐ refuse service
- ☐ telephone
- ☐ sanitary sewer
- ☐ septic system
- ☐ other

2. Describe the utilities that are proposed for the project, the utility providing the service and the general construction activities on the site or in the immediate vicinity which might be needed.

This is a non-project action. Specific utilities proposed for any project will be identified during project-level environmental review.

Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature Charlie Engel

Name of signee Charlie Engel

Position and Agency/Organization Associate Planner, Development Services, City of Bellevue

Date Submitted 10/02/2025



Non-project Action SEPA Checklist

These questions pertain to land use actions that do not involve building and construction projects, but rather pertain to policy changes, such as code amendments and rezone actions.

Because the questions are very general, it may be helpful to read them in conjunction with the Environmental Checklist. When answering these questions, be aware of the extent to which the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented.

Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Adoption of the proposed LUCA will not increase the potential impacts to water, emissions to air, earth resources or noise production.

Indicate proposed measures to avoid or reduce such increases.

N/A

No measures to avoid or reduce water discharge, emissions to air, production storage or release of toxic or hazardous substances, or production of noise are proposed in connection with this LUCA and therefore no significant unmitigated impacts are anticipated with the application. Subsequent project applications will be reviewed in conformance with all applicable city codes, standards and regulations.

2. How would the proposal be likely to affect plants, animals, fish or marine life?

The proposed LUCA will not increase the potential impacts to plants and animals.

Indicate proposed measures to protect or conserve plants, animals, fish or marine life.

N/A

No measures to protect or conserve plants, animals, fish or marine life are proposed in connection with this LUCA and therefore no significant unmitigated impacts are anticipated with the application. Subsequent project applications will be reviewed in conformance with all applicable city codes, standards and regulations.

3. How would the proposal be likely to deplete energy or natural resources?

Adoption of the proposed LUCA would not increase depletion of energy or natural resources.

Indicate proposed measures to protect or conserve energy and natural resources.

N/A

No measures to protect or conserve energy and natural resources are proposed in connection with this LUCA and therefore no significant unmitigated impacts are anticipated with the application. Subsequent project applications will be reviewed in conformance with all applicable city codes, standards and regulations.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains or prime farmlands?

No impacts from this LUCA are anticipated. Although this LUCA will increase development capacity citywide, critical areas regulations, as well as regulations for areas designated for governmental protection, will prevent or address impacts from specific proposals during project-level review.

Indicate proposed measures to protect such resources or to avoid or reduce impacts.

No measures proposed. No impacts anticipated directly from this LUCA.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

No impacts to land and shoreline uses are anticipated with this LUCA. No changes to Part 20.25E, including permitted uses, are proposed.

Indicate proposed measures to avoid or reduce shoreline and land use impacts.

No measures proposed. No impacts anticipated directly from this LUCA.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposed LUCA will likely increase the development capacity citywide particularly in residential areas, thus increasing demand for on-street parking and public transportation. The City has adopted a multimodal level-of-service standard that ensures impacts to all modes of transportation are mitigated under project-level review.

Indicate proposed measures to reduce or respond to such demand(s).

No additional measures are proposed.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts with applicable local, state, or federal environmental laws or requirements are anticipated from this proposal. The proposed LUCA, if adopted by the city, would be consistent with BCC and LUC decision criteria and with local, state, and federal laws and requirements for the protection of the environment



DATE: November 12, 2025

TO: Mayor Robinson and Members of the City Council

FROM: Nick Whipple, Code and Policy Director, 452-4578
Charlie Engel, Associate Planner, 452-6164
Development Services Department

SUBJECT: Proposed Land Use Code Amendment (LUCA) to revise the Land Use Code (LUC) and implement provisions necessary to comply with House Bill 1998 (HB 1998) which requires cities to allow for co-living housing in all Land Use Districts that allow six or more dwelling units per lot by right. File No. 25-105068-AD.

I. BACKGROUND

In 2024, the Washington State Legislature passed, and the Governor signed, HB 1998, which intends to provide additional housing choices by requiring that cities and counties allow for the development of co-living housing. HB 1998 added a new section RCW 36.70A.535 to define and establish requirements for co-living housing. RCW 36.70A.535(11)(a) defines “co-living housing” as a residential development consisting of individually rented, lockable sleeping units that include living and sleeping space. Residents share kitchen facilities with other sleeping units in the building.

RCW 36.70A.535(1) requires co-living housing as a permitted use on any lot that allows at least six units, including on lots zoned for mixed use development. Per the co-living guidance published by the Washington State Department of Commerce, cities are not required to allow for co-living housing on lots where six units are permitted only through an affordable housing density bonus.

HB 1998 mandates that cities and counties update their regulations by December 31, 2025. If a LUCA consistent with HB 1998 is not adopted by this date, state law will supersede the Land Use Code (LUC).

Similar Housing Types in the Land Use Code

Micro-Apartment (LUC 20.20.537). While standards for parking and density are similar between micro-apartments and co-living housing, the two housing types differ in where they are allowed and how they are defined. Under the Land Use Code, micro-apartments are limited to areas near transit that already allow for multifamily. These units are defined as individual dwelling units—each providing

complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation. These units are capped at a maximum gross floor area of 320 square feet. Co-living housing is not required to offer complete independent facilities within each unit. Instead, it provides private living and sleeping quarters while sharing kitchens, bathrooms, and other common areas. Unit sizes in co-living housing must comply with minimum standards set by the state building code but may not otherwise be restricted by local size limits.

Boarding Houses (LUC 20.20.140). Boarding houses are defined as “an owner-occupied dwelling...” and may be rented on either a short term or long-term basis. However, they are limited to renting out no more than two rooms and must provide one off street parking space per rented room. Co-living housing may not be subject to these same restrictions.

Rooming Houses (LUC 20.20.700). Rooming houses are required to be in a detached single-family dwelling and are only permitted in multifamily residential districts. Rooming houses are also limited to renting a maximum of four individual rooms. Co-living housing must be allowed in all residential and mixed-use zones where at least six units are allowed. The bill does not limit the number of rooms that may be rented, and it does not restrict the housing type to detached single-family dwellings. As currently defined, the City’s rooming house regulations are more restrictive than what HB 1998 requires and would not comply with the law’s broader allowances for co-living housing.

II. PROPOSED LUCA

The LUCA will focus on ensuring direct compliance with the requirements in RCW 36.70A.535, as amended by HB 1998. Specifically, to the LUCA is not proposed to deviate from the baseline requirements mandated by state law.

For new co-living housing development in residential and mixed-use areas, the City:

- May not impose room dimensional standards (i.e. dwelling unit size, sleeping unit size, room area, and habitable space requirements) more restrictive than those required by the state building code.
- May not require parking within one-half mile walking distance of a major transit stop. Outside of this transit buffer, the city may only require a maximum of 0.25 off-street spaces per sleeping unit.
- May not require co-living housing to provide a mix of unit sizes, a specified number of bedrooms, or include other uses.

- May not impose development standards that are more restrictive than those required for other types of multifamily residential uses in the same zone.
- May not, for purposes of calculating dwelling unit density, count a sleeping unit in co-living housing as more than one-quarter of a dwelling unit.
- May not exclude co-living housing from participating in affordable housing incentive programs.
- May not, for purposes of calculating fees for sewer connections, treat a sleeping unit in co-living housing as more than one-half of a dwelling.

Of the three housing types described in the section above, the City's current LUC framework for rooming houses most closely resembles co-living housing. However, because RCW 36.70A.535 requires broader allowances for co-living housing than are currently provided for rooming houses—both in terms of where it can be located and how it can be provided—the current rooming house regulations will become increasingly limited in their applicability. As a result, the LUCA proposed to remove the current rooming house provisions and replace this housing type with the state-required co-living housing provisions. These updates would eliminate existing restrictions, such as limiting rooming houses to detached single-family dwellings, confining them to multifamily zones, and allowing only four rentable rooms.

Additionally, the LUCA would update terminology to define “rooming house” in Bellevue as “co-living housing,” consistent with RCW 36.70A.535. State law allows jurisdictions to use their preferred terminology, provided that the adopted standards meet the requirements of the statute.

III. REVIEW PROCESS

The content of this LUCA was introduced and presented to the City Council on November 12. At this meeting, staff sought direction for the Council to enter a finding of necessity to retain authority for processing this LUCA. The public hearing for the proposed LUCA has been scheduled for December 2, 2025. Following the public hearing, the City Council may adopt the proposed LUCA. The proposed LUCA is included in this staff report as Attachment A.

IV. STATE ENVIRONMENTAL POLICY ACT (SEPA)

The application for SEPA review was noticed together with the notice of public hearing for the proposed Co-Living Housing LUCA on November 12, 2025. The environmental review indicates no probability of significant adverse environmental impacts occurring as a result of the LUCA. The Environmental Coordinator for the City of Bellevue has issued a

Determination of Non-Significance (DNS) for this Co-Living Housing LUCA pursuant to the threshold determination requirements in WAC 197-11-340.

V. PUBLIC ENGAGEMENT

Required Public Notice

The public notice required for City Council Legislative Actions (Process IV) is governed by LUC 20.35.415 through 20.35.450. Notice of the LUCA application and public hearing, including the Final SEPA Threshold Determination was published in the Weekly Permit Bulletin on November 12, along with availability of this staff report. Availability of the Weekly Permit Bulletin was noticed in the Seattle Times.

Department of Commerce Notice

Pursuant to the Washington State Growth Management Act, proposed amendments to the LUC must be sent to the Washington State Department of Commerce to review and comment on the proposed amendments to the LUC. The required notice to the Department of Commerce and the initial draft LUCA were transmitted on October 3, 2025 and a copy of both documents is available for review in the code amendment file. No comments have been received by Commerce as of the date of this report.

Public Information Session

A virtual lunch and learn event was held on October 28 to share background information, general legislative requirements, and implications for Bellevue. Following the presentation, attendees were invited to ask questions and share feedback.

Online Presence

A City webpage was published in September for members of the public to find more information on the LUCA, updates on the review process, staff contact information, and methods for providing comments.

VI. DECISION CRITERIA

LUC 20.30J.135 establishes the decision criteria for an application to amend the text of the Land Use Code. Those criteria, and the relationship of these proposed amendments to them, are discussed below:

A. The amendment is consistent with the Comprehensive Plan; and

Finding: The proposed LUCA is consistent with the Comprehensive Plan. The City of Bellevue has adopted comprehensive plan policies HO-10, HO-11, HO-14, HO-18, HO-22, HO-33, and HO-43 that speak to promote a diverse housing stock, eliminate barriers in current city regulations, and address the need for housing affordable to low-income households.

Comprehensive Plan Policy HO-10. Work to identify and eliminate current city policies, practices and regulations that perpetuate housing disparities and discrimination.

Comprehensive Plan Policy HO-11. Ensure a diverse housing stock, including affordable housing, throughout the city to meet the needs of all individuals and families of differing incomes, sizes, arrangements and cultural backgrounds.

Comprehensive Plan Policy HO-14. Ensure there are zoning ordinances and building policies in place that allow and encourage an increase in the housing supply attainable to households along the full range of income levels.

Comprehensive Plan Policy HO-18. Promote housing density, choice and affordability in areas served by the frequent transit network, businesses serving the community's day-to-day needs and significant nodes of employment.

Comprehensive Plan Policy HO-22. Allow innovative housing types and demonstration projects that could serve as a model for new housing choices currently not being built in Bellevue.

Comprehensive Plan Policy HO-33. Address the need for housing affordable to extremely low-, very low-, low- and moderate-income households, through funding, regulations, policies, procedures and other mechanisms.

Comprehensive Plan Policy HO-43. Recognize the connection between housing cost burden and mobility cost and work to provide affordable housing in areas served by the frequent transit network.

B. The amendment enhances the public health, safety or welfare; and

Finding: This LUCA will enhance public health, safety, and welfare by enacting regulations that comply with the requirements outlined in HB 1998 to promote housing density, choice, and affordability by allowing for Co-Living Housing in certain multifamily and mixed-use areas.

C. The amendment is not contrary to the best interests of the citizens and property owners of the City of Bellevue.

Finding: The proposed LUCA is not contrary to the best interests of the citizens and property owners of the City of Bellevue. The LUCA serves the best interests of

Bellevue's citizens and property owners by increasing additional housing choices through allowing for Co-Living Housing.

VII. RECOMMENDATION

Staff has concluded that the Co-Living Housing LUCA, as drafted in Attachment A, is consistent with the decision criteria required for adoption of amendments to the text of the LUC, pursuant to Part 20.30J LUC. Staff recommends the LUCA to City Council for adoption.

ATTACHMENT:

A. Co-Living Housing LUCA Strike-Draft

Chapter 20.10 Land Use Districts

20.10.440 Land use charts.

Chart 20.10.440

Uses in land use districts

Residential – Residential Districts

STD LAND USE CODE REF	LAND USE CLASSIFICATION	LL- 1	LL- 2	SR- 1	SR- 2	SR- 3	SR- 4	LDR- 1	LDR- 2	LDR- 3	MDR- 1	MDR- 2
	...											
	Rooming House (17)	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	P	P	P	P
	...											

...

Chart 20.10.440 Uses in land use districts

Residential – Nonresidential Districts

STD LAND USE CODE REF	LAND USE CLASSIFICATION	Professional Office PO	Office O	Office/Limited Business OLB	Office/Limited Business 2 OLB 2	Light Industry LI	General Commercial GC	Neighborhood Business NB	Neighborhood Mixed Use NMU	Community Business CB	Factoria Land Use District 1 F1	Factoria Land Use District 2 F2	Factoria Land Use District 3 F3
	...												
	Rooming House (17)		<u>P</u>	P	P			<u>P</u>	P	P	P	P	P

STD LAND USE CODE REF	LAND USE CLASSIFICATION	Professional Office	Office	Office/Limited Business	Office/Limited Business 2	Light Industry	General Commercial	Neighborhood Business	Neighborhood Mixed Use	Community Business	Factoria Land Use District 1	Factoria Land Use District 2	Factoria Land Use District 3
		PO	O	OLB	OLB 2	LI	GC	NB	NMU	CB	F1	F2	F3
...													

...

Notes: Uses in land use districts – Residential:

...

(17) See LUC 20.20.700 for general development requirements for rooming house.

...

Chapter 20.20 General Development Requirements

...

20.20.590 Parking, circulation, and walkway requirements

...

F. Minimum/Maximum Parking Requirement by Use.

1. Specified Uses. Subject to subsections G, H, and L of this section, the property owner shall provide at least the minimum and may provide no more than the maximum number of parking stalls as indicated below:

Use	Minimum Number of Parking Spaces Required (4)(5)	Maximum Number of Parking Spaces Allowed
...		

	Use	Minimum Number of Parking Spaces Required (4)(5)	Maximum Number of Parking Spaces Allowed
q.	Rooming/B boarding <u>house</u>	1:rented room	No max.
r.	<u>Rooming house (7)</u>	<u>0.25:co-living unit</u>	<u>No max</u>
sf.	Wholesale, warehouse	1.5:1,000 nsf	No max.
ts.	Vendor cart	1:cart	No max.
ut.	Mixed-Use Commercial	4.5:1,000 nsf	No max.

nsf = net square feet (See LUC 20.50.036).

Notes: Minimum/Maximum Parking by Use:

...

(6) Middle housing projects, as defined in LUC 20.50.034, are exempt from the required minimum number of parking spaces when located within one-half mile walking distance of a major transit stop as defined in LUC 20.20.538.B.1, and subject to the walking distance requirements in LUC 20.20.538.C.2.

(7) Rooming house uses, as defined in LUC 20.50.044, are exempt from the required minimum number of parking spaces when located within one-half mile walking distance of a major transit stop as defined in LUC 20.20.700.B.1, and subject to the walking distance requirements in LUC 20.20.700.C.2.

20.20.700 Rooming houses.

A. Applicability~~Rooming houses, where permitted, shall comply with the following:~~

- Rooming houses are allowed as a permitted use on any lot that allows at least six dwelling units by right. The rooming house shall be located in a detached single-family dwelling on its own parcel; and
- Rooming houses shall not be allowed as a permitted use on lots where six dwelling units are only permitted through an affordable housing density bonus. The rooming house shall offer no more than four rooms for rent at any one time; and
- ~~All rooms offered for rent shall be legally established bedrooms; and~~

- ~~4. An owner, landlord, or registered agent shall be identified as the party responsible and accountable for compliance with the provisions of this section. Said party shall be local, and the name and contact information for that party shall be filed with the City prior to establishing the rooming house; and~~
 - ~~5. Legal on-site parking exists or shall be provided in a quantity equal to the number of bedrooms leased or available for lease; and~~
 - ~~6. Appropriate provisions shall be made for maintenance of the property exterior; and~~
 - ~~7. Appropriate provisions shall be made for refuse collection, including trash, recycling, and yard waste.~~
- B. **Definitions** ~~A rooming house shall comply with City of Bellevue noise and nuisance laws and health and safety codes, and with all other applicable City and State codes and regulations.~~
- ~~1. Major Transit Stop. For the purposes of this section, major transit stop is as defined in RCW 36.70A.535.~~
- C. **Standards** ~~The owner, landlord, or registered agent designated pursuant to subsection A.4 of this section shall be the “person responsible for the violation” in any civil violations proceedings under the terms of Chapter 1.18 BCC for failure to comply with this section. Tenants shall not be identified as responsible parties by virtue of signing a lease prepared by the owner, landlord, or registered agent for renting a room in a rooming house.~~
- ~~The following standards apply to rooming houses:~~
- ~~1. For the purposes of calculating dwelling unit density, each co-living unit in a rooming house development shall be considered one-quarter of a dwelling unit.~~
 - ~~2. Walking Distance. If a physical impediment exists that would require pedestrians to walk more than one-half mile to the major transit stop from the location of the co-living units, then the Director may determine that the location is not within one-half mile of a major transit stop.~~
 - ~~3. Transient Lodging. Co-living units shall not be used for short term stay use or for transient lodging.~~

...

Chapter 20.25 Special and Overlay Districts

Part 20.25A Downtown

...

20.25A.050 Downtown Land Use Charts.

...

D. Use Charts.

The following charts apply to Downtown. The use charts contained in LUC 20.10.440 do not apply within the Downtown Land Use Districts.

...

Residential – Downtown Land Use Districts

STD LAND USE CODE REF	LAND USE CLASSIFICATION	Downtown Office 1	Downtown Office 2	Downtown Mixed Use	Downtown Residential	Downtown Old Bellevue	Downtown Office and Limited Businesses
		DT-O-1	DT-O-2	DT-MU	DT-R	DT-OB	DT-OLB
	...						
	<u>Rooming House (6)</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>

Notes: Uses in Downtown Land Use Districts – Residential:

...

(6) See LUC 20.20.700 for general development requirements for rooming house.

...

Part 20.25Q East Main Transit Oriented Development Land Use District

20.25Q.050 Permitted uses.

D. Use Chart.

The following use chart applies to the East Main Transit Oriented Development Districts:

Chart 20.25Q.050.D Uses in East Main Transit Oriented Development Districts

Std Land Use Code Ref	Land Use Classification	TOD-H	TOD-L
	...		
	<u>Rooming House (39)</u>	<u>P</u>	<u>P</u>

Notes: Uses in East Main Land Use Districts:

...

(39) See LUC 20.20.700 for general development requirements for rooming house.

...

Chapter 20.50 DEFINITIONS

...

20.50.014 C definitions.

...

Co-living Unit. A residential unit that is independently owned or rented, lockable and provides living and sleeping space. Units must share kitchen facilities with other units in the building to be considered a co-living unit.

...

20.50.016 D definitions.

...

Dwelling Unit. Houses, apartments, condominiums, groups of rooms, or single rooms, which are occupied, or vacant, but intended for occupancy, as separate living quarters. Specifically, there is a dwelling unit when the occupants live and eat separately from any other persons in the structure and there is either (1) direct access to the unit from the outside or through a common hall, or (2) complete kitchen facilities for the occupants' exclusive use. A single unit providing complete, independent living facilities for one or more persons including permanent provisions of living, sleeping, eating, cooking and sanitation. For the purposes of LUC 20.20.128 a co-living unit is considered a dwelling unit.

...

20.50.044 R definitions.

...

Rooming House. ~~A residential development with co-living units. A non-owner-occupied dwelling in which rooms are rented on an individual room basis.~~ (Refer to LUC 20.20.700 for general development requirements.)

...