

Bel-Red Comments and Responses

This table lists comments received on Bel-Red draft Subarea Plan and Land Use Code amendments, including the oral comments at the May 28, 2008, Public Hearing, written comments, and those from five panel discussions with business and property owners. These comments have been organized into groups based on topic and like comments have been listed together or combined. We ask the Planning Commission to review the staff responses and if the Commission identifies comments for further review, not already identified by staff, to notify staff (Jeanie Christensen jchristensen@bellevueway.gov) by Tuesday, July 8, to allow the Commission to discuss scheduling review of the items at its meeting on July 9.

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	<i>This column lists the individual comments received through oral testimony, in writing or at a series of meetings with business and property owners</i>		<i>This column references the source of the comment</i>	<i>"Additional Review" is shown where staff recommends that the Planning Commission conduct further review of an issue. Otherwise, a response is noted and staff recommends retaining the current proposal.</i>	<i>This is a blank column that the commissioners may use for notes.</i>
	Process				
1	Important for Planning Commission to move forward on schedule; timing of proposed development	N/A	oral testimony, letter 26	Comment recognized	
2	Bel-Red proposal is complex and needs time for business and property owners to adequately review	N/A	panels, letter 41	In addition to the series of public events in May and previously, the Planning Commission's and City Council's reviews of the drafts will continue to allow for public input. Final adoption is not anticipated for several months, which provides property owners and other stakeholders continued opportunity to review the proposal.	
3	Process excludes opportunity for citizen review; inadequate time and information available for citizens to comment	N/A	letter 20		
4	Critical that Bellevue-Redmond work together	N/A	letter 22	Comment recognized. Coordination with Redmond has been an important part of the Bel-Red planning process.	

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5	Will notices be sent out to all property owners explaining their new zoning/comprehensive plan designation?	N/A	panels	After adoption of the Bel-Red Comprehensive Plan and Land Use Code changes property owners will be notified. Property owners have also been updated throughout the process, including: notice of the public hearing was provided to all property owners and businesses in the area using Assessor and other address records and to known interested parties. Notice of other public events were also widely distributed and information about the project has been published in <i>It's Your City</i> and on the city's Web site. City staff is glad to discuss the draft zoning provisions as they relate to individual properties.	
6	Question about when higher zoning would be contemplated at a potential Overlake Hospital node (north of 12 th in particular)	N/A	panels	In general, the proposal is to change the zoning for the entire subarea at the time of adoption of the plan and code amendments, which could occur later this year. The transit station location near the hospitals has not been precisely determined. The City may reexamine the zoning and intensities allowed around the hospital station area when a station location is determined.	
	General				
7	Supportive of the plan vision; generally supportive of plan and rezone	N/A	panels, oral testimony, letters 32, 40, 41, 44, 45	Comment recognized	
8	Existing plan is adequate	N/A	oral testimony, letters 12, 20	Comment recognized	
9	No need to rezone area	N/A	oral testimony, letter 12, 20	Comment recognized	
10	Rezone is designed to increase city revenues and benefit limited number of property owners	N/A	letters 12, 20	Comment recognized	
11	Supports nodal development pattern; support for focused, mixed-use, concentrated development	N/A	oral testimony, letter 3	Comment recognized	
12	Compact development has the potential to reduced vehicle miles traveled and carbon emissions	N/A	letter 3	Comment recognized	

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13	Subarea Plan reflects "smart growth" principles	N/A	letter 3	Comment recognized	
14	The Planning Commission's public review packet does a good job at capturing the steering committee's recommendations	N/A	panels	Comment recognized	
15	Should include provisions to help "jumpstart" development	N/A	panels	The financial strategy, under review by the City Council, will look for ways to fund an initial phase of public infrastructure improvements that are needed to support new development in the area.	
16	Buildable Lands Report shows that city has ample capacity already	N/A	letters 11, 12, 20	The proposal is intended to address implementation of the vision for the Bel-Red area and is not a direct response to buildable lands. However, the increased capacity that Bel-Red creates will benefit the City in accommodating growth beyond its current 2022 targets.	
17	Draft plan contradicts existing Comprehensive Plan intent to concentrate development Downtown	N/A	letters 12, 20	The 2003 Comprehensive Plan update recognizes Bel Red as a commercial center. This plan is consistent with and implements that designation. The "non-compete" language is a Council guiding principal but is not found in the Comprehensive Plan. The proposed development standards, design guidelines, and mix and distribution of uses are expected to result in a character and form unique for Bellevue and complementary to Downtown and other areas of the City.	
18	Should be compatible with Downtown	N/A	oral testimony		
19	Important for Bel-Red to complement and not compete with Downtown	N/A	letters 42, 45		
20	Development regulations should be reviewed and updated periodically; review implementation of plan every 2 years	J8, p. 27	panels, oral testimony	The Implementation section of the draft Subarea Plan calls for monitoring and review of implementation 5 years after adoption of the plan.	
21	Need analysis of proposed zoning provisions (uses, FAR, height, etc.) compared to existing zoning	N/A	panels	General differences have been discussed. Staff can respond to detailed questions individually.	

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22	Additional development proformas should be used to analyze financial feasibility of the proposed zoning	N/A	panels	The City has evaluated ten prototype development scenarios in developing the incentive zoning proposal. The City has requested the Urban Land Institute (ULI) to conduct a technical assistance panel for additional review of the economic modeling that was used in the preparation of the proposal. The City Council has directed that review of economic modeling be integrated with the Bel-Red financial strategy being addressed directly by the Council. Results will be reported to the City Council in September.	
23	Include discussion in the plan of needed amenities such as child care and elderly care	Neighborhoods/ Districts section, p. 28	panels	Additional Review: The Neighborhoods section of the draft plan describes the range of uses and amenities envisioned. Child and elderly care use are permitted by the Land Use Code. The Planning Commission indicated an interest in additional review of the need for elderly care.	
24	There should be language in the plan that encourages job growth, not just in terms of new square footage	N/A	panels	Job growth and economic development is supported on a citywide basis in the Economic Development Element of the Comprehensive Plan.	
25	How will taxes change for properties that are rezoned to higher intensities and a wider range of allowable uses?	N/A	panels	Property valuations are determined by the King County Assessor and may be adjusted based on improvements made to the property, comparable sales of similar properties, and improvements made in the surrounding neighborhood, such as to other similarly situated properties. Whether changes in valuation result in changes in property taxes depends on the overall citywide levy amount and a property's change relative to the change in valuation for other properties in the City.	
26	Is the Bel-Red plan trying to accommodate a certain level of growth? Or is the zoning being put in place with the hopes development will occur?	N/A	panels	During the visioning process, the City, consultants, and the Steering Committee looked at and recommended a 2030 growth level. The draft plan and zoning are intended to be consistent with that vision and are designed to be able to accommodate additional growth beyond 2030.	

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27	Small business and services are extremely important to the city	N/A	panels	Comment recognized. Portions of the Subarea are proposed to continue to support commercial uses similar to today and even where higher intensities are planned, a mix of new and existing uses is expected to continue for many years. The proposed Land Use Code makes extraordinary provisions for retention and expansion of existing uses, in part because of this community concern.	
28	No market analysis to justify rezone	N/A	letter 20	The City conducted a market analysis that was used as the Steering Committee developed its preferred alternative.	
29	Rezone is product of staff; Steering Committee uncritically accepted and approved staff's scheme	N/A	letter 20	The Bel-Red planning process has involved numerous Steering Committee, Planning Commission, City Council and other public meetings. Action on the final recommendation is at the discretion of the City Council.	
30	Public projects proposed will require condemnation of private properties	N/A	letter 20	The City has a history of working cooperatively with property owners during the development of public projects. The city will negotiate with the affected property owners in the acquisition of necessary right-of-way. Acquisitions will occur pursuant with applicable federal, state, and local law in the acquisition of necessary right-of-way. While the city retains the ability to exercise its powers of eminent domain (condemnation), such actions may occur when necessary right-of-way can not be obtained through negotiation.	
31	Infrastructure is necessary for redevelopment	N/A	letter 22	The Subarea Plan identifies infrastructure that is important for the vision of the area.	
32	Language should be consistent in tone with past planning efforts; soften words like "mandatory"	N/A	letter 22	Comment recognized	
33	Studies used by Steering Committee may have under estimated growth potential	N/A	letter 44	Comment recognized	
34	Work with early developers	N/A	letter 44	The City has and continues to work with property owners, business owners, developers and stakeholders throughout the area.	

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	Housing	Housing section, p. 17			
35	Don't defer housing for a later process		oral testimony	Housing policies and targets are included in the draft Subarea Plan.	
36	Support for housing policies		letter 31		
37	Policy targets are essential		oral testimony, letter 31		
38	Don't miss opportunity to address housing affordability		oral testimony		
39	Number of new residential units is fictitious		letter 11	Comment recognized	
40	No rationale for increase in MF housing in Subarea		letters 12, 20	Rationale for housing is discussed in the Steering Committee Final Report	
41	Affordable housing near jobs and public transportation is an effective environmental sustainability measure		letter 31	Comment recognized	
42	Low-income and moderate-income housing is important for future employees in the subarea		panels	Proposal includes policies and regulatory incentives to encourage low and moderate income housing.	
43	Include a mandatory level of housing affordability; risk that none may be built without mandatory requirement	F2, p. 18	multiple oral testimony, letter 15	Under the current proposal, any housing development in the node areas that exceeds a base level would need to provide a share of affordable housing as part of the incentive system. Staff recommends no change to this tiered incentive approach, which is an unusually powerful incentive approach.	
44	Need mandatory requirement for housing for those earning less than 50% of median income	"	oral testimony		
45	Opposed to mandatory housing requirement	N/A	letter 3		
46	Need targets for lower income levels; targets for full spectrum of need	F2, p.18	oral testimony, letter 15	Additional Review: The Planning Commission will continue to consider the housing targets in draft policy F2.	
47	Housing needs to be affordable for businesses to attract "knowledge workers"	F1, F2, p. 18	oral testimony		
48	Housing policies appear to allocate 60% of residential units to below market rate housing	F2, p. 18	letter 20		
49	Policy appears to support artificial pricing on up to 80% of new housing	"	letter 3		

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50	There should be a sliding scale on the number of affordable units required, depending on the level of income addressed	20.25D.150.C p. 69	letter 15	Additional Review: Staff recommends focusing the housing incentive at about the 80% median income level for rental units and 100% median income for ownership units which is a level with an important need, where a significant number of units could be constructed, and where units can successfully be built as part of market-rate developments. The Planning Commission may choose to review this further and a sliding scale could be added as an option.	
51	Letting the market supply as much housing as possible may be better approach to affordable housing	N/A	panels	Local history has demonstrated that market forces alone, or with weak incentives, do not fully address the need for housing affordability across a range of income levels.	
52	Difficult to provide affordable housing in new development project – too much subsidy needed from market units	N/A	panels	Comment recognized	
53	Affordable housing is a citywide issue	F4, p. 18	panels, letters 3, 41	Draft policy F4 recognizes Bel-Red as part of a citywide effort to address housing affordability. A citywide housing implementation process was initiated in Oct. 2007 and has included citywide actions, such as modification of the Housing Trust Fund criteria. Additional citywide steps to address affordable housing are programmed to follow the Bel-Red project, and land use incentives similar to those proposed for Bel-Red could be considered for other future rezone cases.	
54	Residential projects should include both a mix of unit sizes and prices	F1, p. 17	panels	A mixture of units types is common in multifamily developments. No additional code provisions are needed to ensure a variety of unit types. . Draft policy F1 encourages a diversity of housing types.	
55	Affordable units are often small and not conducive to families	F1, p. 17	panels		
56	Encourage affordable housing to be built on-site and in Bel-Red	20.25D.150.C p. 69	letter 15	Proposed incentives encourage on-site by providing a lower bonus rate for offsite or fee-in-lieu options.	
57	Make affordable housing FAR exempt	"	letters 4, 41	Additional Review: Under the proposal, the affordable housing units built as part of the incentive system would be exempt from FAR. Staff will suggest changes that clarify the FAR exemption.	

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58	Exempt parking for affordable housing	20.25D.110.B(5) and .F p. 49	letter 4	Additional Review: Additional review is planned of the parking regulations, generally. For housing, a reduced rate of 0.25 stalls per unit is currently proposed for studios at 60% of median income level. Parking rates could also be adjusted under Director's modification section (F).	
59	Use affordable housing as way to "jump start" housing		letter 15	The City could review direct public housing investments in Bel-Red following adoption of the Bel-Red plan. No action is required at this time.	
60	Create as many tools as possible for greater flexibility		letter 15	Additional Review: The Planning Commission has reviewed a number of potential tools to encourage housing affordability. The Commission may conduct additional review of tools as part of its discussion of housing targets.	
61	Expedite permit process for affordable housing		letter 4		
62	Concept of employer-assisted housing		panels		
63	Use public subsidies and other funding tools; don't rely on development contributions		letter 3		
64	Plan for greater housing growth		letter 22	Comment noted. Proposal accommodates 5,000 forecast units through 2030 but is not limited to this number.	
65	Support for re-evaluating and adjusting targets over time	J8, p. 27 F3, p. 18	letter 31	The Implementation section of the draft Subarea Plan calls for monitoring and review of implementation 5 years after adoption of the plan. The Housing section of the draft plan also calls for review of housing strategies related to the housing targets 3 to 5 years after adoption.	
	Transportation	Transportation Section, p. 20			
66	Support for proposed transportation system – good balance of travel choices		panels	Comment recognized	
67	City should build transportation infrastructure ahead of time – like it was done in downtown		panels	Construction of much of the transportation system will rely on a partnership with private sector development to help provide the land and the funding. While planning for new roadways is occurring ahead of time, much of the actual construction is likely to occur closer to the time that development takes place.	

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68	Planned street (131st) goes through site	Fig S-BR.2, p. 32	oral testimony	The long-term vision for the Bel-Red Subarea, especially in the vicinity of transit nodes, is to create a fine-grained roadway network with closely spaced streets and small blocks. There is very little right-of-way currently available. As parcels redevelop, land may be dedicated for roadways, and as the City pursues public roadway projects, land may be purchased. The precise alignment of streets has yet to be determined, so it can not now be said exactly which parcels or buildings would be displaced. Ultimately, right-of-way is typically owned by the City, although private streets and easements may be permitted in limited instances.	
69	Concern about how right-of-way will be obtained; who will own it?		panels	The City has a history of working cooperatively with property owners during the development of public projects. The city will negotiate with the affected property owners in the acquisition of necessary right-of-way. Acquisitions will occur pursuant with applicable federal, state, and local law in the acquisition of necessary right-of-way. While the city retains the ability to exercise its powers of eminent domain (condemnation), such actions may occur when necessary right-of-way can not be obtained through negotiation.	
70	What process will be used for sidewalks - condemnation, acquisition, easements?		panels		
71	Do ongoing modeling/analysis of transportation plan after implementation	N/A	oral testimony	Implementation of the Bel-Red area transportation plan will occur incrementally over many years. Bellevue continually monitors and models traffic on the transportation system as a whole, and as projects come on line they are added to the network.	
72	Increased congestion will hurt tenants		oral testimony	Comment recognized	
73	New roads in Bel-Red will increase traffic congestion elsewhere		letter 12, 20, panels	New development in the region, in downtown Bellevue and in the Bel-Red area will increase traffic throughout the area. New roads planned for the Bel-Red Subarea will provide alternate routes and extra capacity that could relieve the pressure/congestion on other roadways.	
74	General concern about traffic congestion		letters 25, 42		

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75	Concern about the carbon footprint associated with major roadway improvements – NE 16 th as example; providing new roadways to encourage the use of private automobiles increases the city's carbon footprint		panels, letter 41	In the Bel-Red Subarea, a significant investment will be made in transit and pedestrian and bicycle facilities that will provide options for getting around. The mixed-use land use pattern will support alternatives to single-occupant vehicle trips.	
76	Streets should be narrow, with on-street parking and planting strips (like Portland)		letter 41	Many of the new streets in the Bel-Red area will be developed with the characteristics described in the comment. Others, particularly arterials like NE 15th/16th Street, 120th Avenue NE and 124th Avenue NE will be wider to accommodate the anticipated volume of traffic. Street trees and/or landscaped areas will be incorporated into the design of each new or expanded street.	
77	New grid streets will be very useful to serve the area	Fig S-BR.2, p. 32	panels	Comment recognized	
78	Concern about impact of NE 10th Street extension		letter 8	The proposed NE10th Street extension has been removed from consideration in the proposed long-range transportation system at the recommendation of the Transportation Commission because its considerable costs/impacts were shown to exceed its benefits.	
79	Additional north-south capacity on 120 th and 124 th Ave is critical	Table 1, p. 34	panels	This is proposed - expansion from 2 lanes to 4 lanes plus sidewalks on each of these arterials, with bike lanes on 120th Avenue NE.	
80	Be careful about the ultimate street width of the 130 th Ave Retail Street		panels	130th Avenue NE north of NE 15th/16th Street is intended to be a two lane roadway with on-street parking and wide sidewalks – a configuration deemed very supportive of the concept of a pedestrian-oriented retail street.	
81	Consider more retail streets similar to the proposed 130 th Ave Retail Street	Table 1, p. 34	panel	A market analysis done early in the Bel-Red planning process concluded that a significant amount of new retail development was not needed in the study area. The Steering Committee wanted to focus new small-scale retail development on a single street (130th Avenue NE) to ensure that it is economically viable and creates a vibrant urban environment. Additional retail could be located elsewhere, but this one street is intended to develop in a traditional "Main Street" urban character.	

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82	The 140 th BR-CR area does not seem to be well served by transit service under this proposal – the light rail stations are pretty far away	Fig S-BR.2, p. 32	panels	The nearest light rail transit station to the 140th Avenue NE area is proposed at 130th/132nd Avenues NE at NE 15th/16th Street. Transit “feeder” service would connect nearby neighborhoods to the station. The proposed land use on the BR-CR zoning is lower in intensity than the land use near stations – reflecting the lower amount of planned transit service.	
83	Ask state to expand SR-520 to relieve east-west traffic		oral testimony, panels	Bellevue supports SR 520 expansion – this expansion is part of the adopted Metropolitan Transportation Plan (Destination 2030) and was assumed as part of the regional transportation network modeled in the Bel-Red Final Environmental Impact Statement.	
84	Support for integrated ped-bike network	Ped-Bike Section, p. 22	letter 3	Comment recognized. Improvements to the pedestrian and bicycle network in Bel-Red are incorporated in the project list in the Draft Subarea Plan, and are also being incorporated in the update to the City’s Pedestrian and Bicycle Transportation Plan.	
85	There should be goals for bicycle improvements and usage		panels	The Bel-Red plan calls for increased facilities for walking and bicycling. These facilities will give commuter and recreational cyclists the option to ride throughout the area and to adjacent neighborhoods. Staff does not recommend creating numeric goals for bicycle usage.	
86	There have been issues with city maintenance of easements in Bel-Red in the past		panels	Comment recognized. Maintenance for easements is conducted on a regular basis and maintenance staff are very responsive to specific concerns brought to their attention. Not sure what specific issues the panelist refers to.	
87	Better modeling should be completed to determine best and highest use for transportation corridors; need more detailed analysis		letter 22	Transportation system modeling analysis was done for the Bel-Red Final Environmental Impact Statement to help determine the roadway projects needed to support growth. Additional modeling and analysis has resulted in a refined transportation system recommendation that shows in some cases where intersections would not need to be as wide as earlier proposed. Additional modeling analysis is being conducted for various scenarios for the design of NE 15th/16th Street.	

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88	What is the effect of changing the boundaries of MMA 12 on adjacent MMAs – MMA 9 in particular?	Transportation Element, p. B-2	letter 28	The proposal is to change the boundaries of MMA 12 to coincide with the Bel-Red Subarea. MMA 4 would then be reconfigured to encompass the Wilburton area and the hospital district west of 116th Avenue NE. Changes would result in a minor adjustment to the northern boundary of the adjacent MMA 9. All intersections on the boundary are currently assigned for analysis purposes to MMA 12, and that would continue in the proposal.	
89	Allow transportation management to be included in concurrency evaluations		letter 3	The City's concurrency system is implemented based on specific provisions in the City's Municipal Code. Concurrency is based on adopted Level of Service (LOS) standards for each Mobility Management Area (MMA) as outlined in the Comprehensive Plan. The LOS standards do take into account the availability of other modes (such as transit or walking). The City is currently working with the Puget Sound Regional Council (PSRC) on a pilot project to look at multi-modal concurrency in Downtown Bellevue. This project is scheduled to be completed in mid-2009, and could lead to changes in the City's concurrency system.	
90	Allow concurrency certificates for multiple phases of a project		letter 3	Multiple phase development is discussed in the traffic standards code at BCC 14.020.B.	
	Level of Service (LOS)				
91	Keep current LOS standard; LOS of 0.85 would be more appropriate	Transportation Element changes, p. B-4	oral testimony, letters 42, 43	Changing the LOS from .9 to .95 is a Steering Committee recommendation and is consistent with Comprehensive Plan policy TR-36 and the land use vision for the area, and is supported by a strong emphasis on developing alternatives to the single occupant vehicle – in particular, transit and non-motorized commute options.	
92	Supports proposed 0.95 LOS		letter 3		
	NE 15th/16th Corridor	Table 1, p.34			
93	The proposed design of NE 16 th will have developers "choosing a single side" rather than having the whole area work together; width of the proposed NE 16 th would separate nodes into two halves		panels	Additional Review: A final design for NE 15th/16th Street has not been determined. Staff is aware of and sensitive to the concern about the potential width of the roadway and is exploring ways to reduce the width while retaining the range of functions (roadway, transit,	

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94	Concerned about width of NE 15th/16th Street; 200 ft wide 16th Street will create separation between areas of density		letters 3, 21, 41, panels, oral testimony	ped/bike) that was envisioned by the Steering Committee.	
95	Concern about NE 16 th right-of-way impacts, limitations on redevelopment		panels		
96	Parks Board endorses conceptual design for NE 15th/16th Street		letter 14		
97	Concerned about impacts on 15th Street		panels		
98	Concern about NE 16 th Street pedestrian crossing times		panels, letter 3		
99	NE 16th Street would require taking of property; would be a "street to nowhere"		oral testimony letters 12, 20	NE15th/16th Street would be a major, multi-modal transportation corridor connecting the Bel-Red Subarea to downtown Bellevue to the west and to the Overlake area to the east. In addition to adding general purpose and transit connections, it would also function as the main non-motorized connection between Bel-Red and Downtown Bellevue.	
100	Consider dispersion of NE 16 th functions, so they are not all in the same corridor; consider more grid streets and less throughput on NE 16 th		panels	The Bel-Red Steering Committee envisioned NE 15th/16th Street as one with multiple transportation functions as well as being a green corridor that connects elements of parks and open space. Each preliminary design option being considered incorporates the Steering Committee's direction. Dispersing those functions was considered, but staff recommends retaining the multiple functions on the NE 15th/16th Street alignment because it is the only option of east-west continuity. This option also provides an extensive grid system for local access and connectivity within the nodes. Due to topography and environmentally sensitive areas, plus lack of existing right-of-way, staff does not recommend other new east/west arterial streets in the Subarea.	
	<i>Light Rail Transit</i>				
101	Preserve right of way for transit/LRT	H18	oral testimony, letter 40	Sound Transit is ultimately responsible for ensuring that right-of-way is acquired for the light rail alignment and stations. There may be opportunities to partner with the City where the LRT alignment coincides with a roadway project.	

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102	Consider transit overlay zone or make transit uses permitted	20.25D.070, p.21	oral testimony, letter 40	Light rail transit is a unique and intensive use that should be reviewed when a specific alignment and station areas are selected. Current proposal allows transit facilities as a conditional use. This recognizes the appropriateness of transit facilities while establishing a process to ensure the right local fit.	
103	Consider depressing light rail under 120 th Ave to ease congestion in the area	N/A	panels, letter 3	A "tunnel" option for light rail under both 120th Avenue NE and 124th Avenue NE has been discussed. The difference in cost between a tunnel option and a surface option is estimated at \$60 million. This is not a decision that is made by Bellevue, but rather by the Sound Transit Board. The surface alignment impact on intersection operation has been analyzed and no significant adverse impacts on intersection operations were found.	
104	LRT station access near Lake Bellevue properties should be on west side of BNSF tracks		letter 8	Light rail alignments and station locations are within the purview of the Sound Transit Board. The Bel-Red recommendation does not specify a preferred location for a potential light rail station in the vicinity of Overlake Hospital – much depends on the alignment through downtown Bellevue and the location for crossing I-405. When a preferred station location is selected, the City will work with Sound Transit on the details of station design and its relationship to the adjacent neighborhoods.	
105	Consider Bus Rapid Transit for Bel-Red prior to light rail	H17	letter 43	This is being considered and is not precluded by the Subarea Plan.	
106	Should make plans for interim BRT/transit alternatives to light rail	H17	letter 22	Implementing BRT in advance of light rail is supported by the Subarea Plan.	
107	Light rail will help people get out of their cars	H17	panels	Comment recognized	
108	Sound Transit should be responsible for the light rail right-of-way	H18	panels	Sound Transit is ultimately responsible for securing the needed right-of-way for light rail. Opportunities may exist for the agency to coordinate efforts with the City of Bellevue to acquire right-of-way where city streets and light rail would be developed in the same corridor.	
109	Concerned that plan's financing options doesn't address light rail transit	N/A	letter 40	Financing for light rail is the responsibility of the Sound Transit Board.	

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110	Uncertainty of light rail; replace references to light rail with "high capacity transit"		letter 3	The plan purposefully provide City direction for the inclusion of light rail in the Bel-Red area. The plan does not preclude the use of, and indeed encourages, other forms of transit as interim measures prior to light rail and to supplement light rail. The plan could accommodate other forms of high capacity transit if Sound Transit changed its chosen form of transit technology.	
	124th Avenue	Table 1, p. 34			
111	Concerned about widening of 124th Avenue		oral testimony, letter 32	Bel-Red Final Environmental Impact Statement, and the Transportation Commission recommended widening 124th Avenue NE from its current 2-lane configuration to 5-lanes (4 thru lanes plus left turn pockets) to accommodate anticipated travel demand associated with proposed Bel-Red land use, and anticipated citywide growth. Where right-of-way is dedicated as part of a development, Land Use Code provisions for Bel-Red allow for the property owner to receive FAR credit for the development potential of that land.	
112	Property impacts associated with widening 124 th Ave, maybe provide density benefits		panels		
113	Concern about right-of-way needed for 124 th Ave improvements between NE 8 th and Bel-Red		panels	Expansion of 124th Avenue NE south of Bel-Red road is not anticipated.	
114	The 124 th ramps to SR 520 are an important part of regional connectivity		panels	This is proposed.	
115	New interchange at 124 th Avenue NE/SR 520; state doesn't have any plans		letter 12, 20	Adoption of local plans will help encourage state planning for this interchange.	
	BROTS (Bel-Red Overlake Transportation Study)	20.25D.040, p. 8			
116	Support update to BROTS; BROTS should be updated prior to Bel-Red adoption		oral testimony letter 20	BROTS is in the process of being updated. It is targeted for adoption concurrent with the Bel-Red Subarea Plan. BROTS is an interjurisdictional agreement being coordinated with Redmond, and therefore action by both City Councils will be required.	
117	BROTS should be updated prior to subarea plan adoptions		letter 12		
118	Consider traffic impacts associated with adjacent development such as Microsoft		panels	Traffic considerations from Bellevue, Redmond and regional sources are incorporated into the transportation system modeling and the resulting recommendations for roadway and transit improvements.	

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	Regulations - General				
119	Code should allow for efficient permit process, be clear and predictable	N/A	letter 3	Comment recognized. Bellevue has strived to make its permit process efficient and our goal is for the new code language to continue to support that objective.	
120	Authorize use of binding site plans	N/A	letter 3	Binding site plans could be used consistent with Bellevue Land Use Code process provisions of LUC Chapter 20.35.	
	Parking	25.25D.110, p. 47			
121	Good transit service needs to be in place for developers to consider building at low parking ratios		panels	Additional Review: Planning Commission may continue to review the proposed parking ratios.	
122	Parking ratios are too high to be transit supportive		oral testimony, letter 40		
123	Parking costs are a big variable in the economics of new development		panels	Comment recognized	
124	There should be a clear difference in the node versus outside node parking ratios		panels	The proposal includes different parking ratios for those districts in nodes and those outside of nodes.	
125	FARs proposed may not support underground parking		panels	The proposed plan and code support development of structured (underground or below ground) parking through a combination of FAR levels, dimensional standards, and design standards. It is expected that some developments may include some surface parking and that structuring parking will be more common in the districts with higher FARs. FAR levels are discussed further in a section of comments below.	
126	Need to plan for park-n-ride facilities		letter 22	Additional Review: Further work is needed to evaluate demand for additional park and ride facilities as part of Sound Transit's East Link project. A park and ride facility may be appropriate somewhere in the RC-1 nodal area, particularly to help connect north and east Bellevue residents to the transit system. This siting and management of a park and ride must be carefully handled to avoid undermining mode split goals for commuters working within a transit node.	
127	Park-n-rides should be located near the stations, but away from the central core of the villages		letter 41		

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	Utilities				
128	Plan for utility infrastructure over the long term (50-100 years)		letter	Public infrastructure investments needed to support changes in land use are incorporated into the City's 20-year comprehensive plans for water and wastewater.	
	Phasing	20.25D.014, p. 5 A4			
129	Phasing 0.5 FAR limit will result in low density development; Eliminate 0.5 FAR phasing limit		oral testimony, letters 3, 21, 44	The proposed phasing limit of 0.5 in some node areas is directly linked to the Council's review of the financial strategy and is recommended to ensure that development financially participates in its share of new infrastructure responsibility.	
130	Phasing provisions should not inhibit growth occurring in the 122 nd node		panels		
131	Having a "funding mechanism in place" is too limiting – beyond the reach of just the property owners, requires political process		panels	The proposed "funding mechanism" for phasing is directly linked to the City Council's review of the financial strategy.	
132	Catalyst development projects should be allowed to move forward		panels	The proposed phasing is not set up to "unlock" different areas at different times. The phasing regulations that are proposed provide a link between development and the financial strategy to support the provision of infrastructure and high capacity transit service.	
133	Remove 2030 development limit; Phasing cap smacks of a "no growth" attitude		letters 3, 21	The 2030 phasing regulations that are proposed respond to community interest to ensure that development doesn't outpace the development of transit service, and is consistent and the principles established between the Redmond and Bellevue City Council to guide an update to the BROTS Interlocal agreement. It is also consistent with the highest growth scenario evaluated in the EIS.	
134	The proposed phasing system will create uncertainty for new development (and their potential new tenants)		panels, letter 3	Uncertainty should be reduced as the financial strategy is reviewed by the City Council as part of the Bel-Red package.	
135	Phasing system needs to have more flexibility built in to account for unique circumstances		panels	Comment recognized	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
136	The projects identified in the phasing plan need to be prioritized (must-haves and nice-to-haves)		panels	The proposed phasing regulations refer to a first phase of priority projects. All of the transportation projects in the first phase of the phasing plan are necessary.	
137	The public projects in the first phase of the phasing plan are very expensive		panels	Comment recognized	
138	Development in the subarea will not necessarily want to follow the location of the phased transportation investment		panels	The draft plan and code are set up in a way that recognizes that development may occur throughout the Subarea at different times. The proposed phasing is not set up to "unlock" different areas at different times, although some development may be dependent on the timing of increased access and improvements, while other developments may be able to proceed immediately.	
139	How does BROTS play into the overall financing of the phased transportation infrastructure?		panels	The cost for additional BROTS projects is still being developed. BROTS will be reviewed in parallel with Bel-Red and costs of BROTS (and Bel-Red) will be reviewed by the City Council.	
	Uses (also see discussion of districts)	Use Charts, p. 16-34			
140	Use provisions seem too restrictive; should have more use categories and more permitted uses		oral testimony, panels	Comment recognized. Unsure which use limitations are seen as too restrictive.	
141	Consider performance guidelines instead of use guidelines		panels	The proposal maintains the use chart structure of the overall Land Use Code. However, many performance standards are incorporated into the draft code.	
142	Consider shared educational and housing uses for educational institutions		letter 22	Additional Review. Modifications to the land use charts regarding colleges and special schools will be presented to the Planning Commission on 7/9.	
143	What use is planned for the Metro site		panels	While the City coordinates with King County, it is not aware of changes in specific plans for the Metro sites.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
144	Change to single area-wide mixed use zone		panels	The proposed zoning is consistent with the vision recommended by the Steering Committee that seeks higher densities near transit facilities, medical uses near the existing hospital campus, and that seeks to retain zoning that supports many existing commercial uses in some locations.	
145	Don't limit or require percentages for one type of use in mixed use districts	B4	letter 3	Additional Review. While a limitation or requirement of mixed use in not part of the current proposal, the Planning Commission has identified this as an item for their further consideration.	
	Existing Uses / Conditions	20.25D.060, p. 9			
146	Don't force redevelopment		oral testimony	Proposed existing conditions code section seeks to provide a regulatory system of allowing existing uses to continue, expand, and not be classified as non-conforming, while supporting redevelopment of new use categories.	
147	"Do no harm"		oral testimony, letters 22, 46		
148	Consider existing use overlay		oral testimony		
149	Limitations on existing use expansion too restrictive		letters 9, 39	Comment recognized	
150	Include new policy on existing uses (proposed in Coke letter)	B5, B6	oral testimony	Draft Subarea Plan supports accommodating existing uses.	
151	Limitation on hours of operation is too restrictive; vague as to how hours of existing uses are regulated; continued operations should be allowed at anytime of day	20.25D.060.F.1	multiple oral testimony letters 9, 27, 39	Additional Review: Staff is reviewing this code section and will bring back to the Planning Commission changes to clarify.	
152	Documentation of existing uses too great a burden	20.25D.060.D	oral testimony, letters 9, 39		
153	Length of time to continue existing use should be 36 months		oral testimony, letter 29		
154	\$150K threshold for redevelopment is too low		oral testimony		
155	Limitation on reconstruction of buildings destroyed "within the control of the owner" too restrictive		letters 9, 39		

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
156	Wants to be able to expand LI uses until time of redevelopment; provide greater flexibility for expansion of existing uses		oral testimony, letter 29	Existing conditions section allows expansion of existing LI uses, with restrictions.	
157	Concern about change of use while still being considered an existing use – how use categories work		panels	Additional Review: Staff is reviewing this code section and will bring back to the Planning Commission changes to clarify.	
158	Allow Autos Retail, Motorcycles, and Vehicles Retail as 'E' use in RC-2 zone		letter 29	Additional Review: Treatment of individual uses will be reviewed by staff and results will be brought back to the Planning Commission.	
159	Allow Boats Retail as 'E' use in CR zone		letter 29		
160	Allow Warehouse & Storage Services as 'E' use in CR zone		letter 29		
161	Remove note 6 for the 'P' for Auto Repair in the RC districts		letter 29		
162	Draft code doesn't capture Steering Committee's recommendation for light industrial uses		letter 9	Comment recognized. Specific comments about the existing conditions code are addressed below.	
163	Make existing uses permitted, rather than 'E'		oral testimony	Making new light industrial uses permitted in addition to new office, commercial and residential uses would serve to create a variety of land use incompatibilities by encouraging new LI uses adjacent to new office or residential uses. It would also reduce the predictability of redevelopment of the area and is not recommended. The "existing use" provisions implement the vision recommended by the Steering Committee.	
164	Phase in discontinuation of existing uses		oral testimony, panels		
165	Existing businesses are important to the city		oral testimony, panels	Comment recognized. Portions of the Subarea are proposed to continue to support commercial uses similar to today and even where higher intensities are planned, a mix of new and existing uses is expected to continue for many years. In areas where the proposal does not allow for the siting of new light industrial uses, extraordinary provisions are made for the retention and even expansion of existing uses.	
166	Policies to allow existing LI/GC uses to continue is smart; supports maintaining diverse economy		letter 28	Comment recognized	
167	Preserve some LI uses		letter 22	LI uses are generally incompatible with the long-term vision for the area and allowing new industrial uses to establish would significantly delay conversion to the new	
168	Limit on new LI and re-establishing LI uses too restrictive		letter 29		

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
169	Allow expansion within nodes	B5	letter 29	uses envisioned by the Steering Committee.	
170	Consider phasing use transition timed with infrastructure phasing	B5, B6	letter 29	The proposed infrastructure and land use phasing approach is intended to ensure that infrastructure is in place to serve the requirements of new development. Within this constraint, market forces are intended to drive the timing of land use transition/redevelopment. The draft plan and code are set up in a way that recognizes that development may occur throughout the Subarea at different times.	
171	Allow the local economy to drive timing of transition of uses	B5, B6	letter 29	Comment recognized	
172	Ensure that all current permitted use categories are covered by existing use provisions		oral testimony, panels	Additional Review: Staff will review the use categories included, although some, such as poultry and fish hatcheries and production of food and fiber crops, were deliberately not carried forward as "E" uses in the land use charts. These were use categories that do not exist in the Bel-Red area today. This item will be further reviewed with the Planning Commission.	
173	Compatibility of major existing uses with development in/near nodes		panels	Comment recognized	
174	What will impacts be to existing LI properties near 16th/130th?		panels	Existing uses will be allowed under the proposed existing conditions code.	
175	Change district name to BR-ORE – Office Residential Existing to acknowledge continuation of existing uses		letter 9	Comment recognized	
176	Reference to "existing uses" appears to be incorrect and should be "existing conditions"		letter, 9, 39	Additional Review: Staff will review language, suggest corrections as needed, and report back to the Planning Commission.	
177	Definitions for "existing use" and "existing development" seem redundant		letters 9, 39	Additional Review: Staff will review language, suggest corrections as needed, and report back to the Planning Commission.	
178	Reference to "paragraph 4" but no paragraph 4 exists		letters 9, 39	Additional Review: Staff will review language, suggest corrections as needed, and report back to the Planning Commission.	
179	Coca-Cola Bottling would be compatible with neighboring residential use		letters 9, 39	Comment recognized	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	Zoning Districts	Use Charts, p. 16-34			
180	Zoning / land use map does a good job at capturing the steering committee's recommendations		panels	Comment recognized	
181	Zoning should allow for mixed-use development throughout much of the corridor		panels	Mixed use development is proposed to be allowed – with different mixes and intensities – in nearly all districts in the subarea.	
182	Nodes should be expanded beyond the quarter-mile radius		panels	Generally, a quarter mile distance is consistent with an area being most walkable to the planned transit stations. This is the zone of primary influence from the station. The nodes also need to be small enough to help concentrate development.	
183	Extend 122 nd node to the south of NE 12 th (between 120 th and 124 th)		panels	The comment area is well outside the ¼ mile radius of the 122 nd transit node. The Steering Committee vision and discussion consistently recognized this area as outside the 122 nd node. NE 12th is identified as a logical place to transition from the node districts to the surrounding area.	
184	Nodes are based too much on potential transit service that may not be there for 20 years		panels	The Bel-Red land use pattern is intended to be supportive of and supported by high capacity transit, including both light rail and potentially interim bus-rapid-transit solutions.	
185	Is the number of allowable uses fewer (than existing) in any of the proposed zoning designations?		panels	Staff hasn't completed a count of use categories. The proposal significantly expands the range and intensity of uses permitted in new Bel-Red districts, and this is more meaningful than the absolute number of use categories (groupings).	
186	Proposed zoning seems to be arbitrary		panels	Proposed zoning pattern is based on the land use vision recommended by the Steering Committee.	
187	Maybe a single new zone should be used for all the existing LI land		panels		
188	Allow more retail use in office zone		letter 34	No change recommended. A variety of retail uses are proposed to be allowed in the office districts.	
189	Allow taller buildings		letter 41	Heights were considered by the Steering Committee, were extensively analyzed and modeled in the EIS, and further reviewed by the Planning Commission. With limited exception, staff doesn't recommend changes to the proposed height limits.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
190	Height limit should be 75 ft throughout area (outside of nodes)		oral testimony	Additional Review: Staff will review the RC-3, MO, OR, and CR height max for consistency with building code standards and bring this back to the Planning Commission for review. No other review of height limits is proposed.	
	BR-R District	Use Charts, p. 16-34			
191	Consider taller heights for residential buildings		letter 22	Heights were considered by the Steering Committee, were extensively analyzed and modeled in the EIS, and further reviewed by the Planning Commission. Staff doesn't recommend changes to the proposed R district height limit of 45 ft.	
192	Allow more retail uses (up to 40,000 SF), greater flexibility in R district		multiple oral testimony, letters 30, 34, panels	Additional Review: Larger retail uses are provided for in the CR, RC, and GC districts. Staff doesn't recommend allowing for larger retail uses in the R district which, per the Steering Committee's recommendation, is intended to heavily favor residential uses. Small, convenience retail type services are also allowed.	
193	R district 1.0 FAR and 45 ft height limit is too low; not equitable with other properties		oral testimony, letter 30	Additional Review: FAR levels have been identified as an item to further review (see FAR section below). Planning Commission directed to change FAR to 2.0 for the R district at its 7/2 meeting.	
194	Seattle NC zones support 3-4 FAR within a 60 ft height limit – consider as model of R district/non-node area		oral testimony, letter 30		
195	The maximum FAR in the BR-R zone should be increased		panels		
196	The proposed BR-R zone along 120 th Ave is not conducive to housing development		panels	Moderate density residential development in this area is consistent with the Steering Committee vision.	
	BR-MO District				
197	Medical retail should be permitted use in Medical Office zone		panels	Additional Review: Staff will review the potential for how medical retail uses might be accommodated in the MO district and report back to the Planning Commission	
198	Suggestion for higher density (and allowable height) along 116 th Ave between NE 12 th and NE 20 th , while retaining proposal north of NE 20 th		panels	Proposal recommends focusing higher intensity medical office uses near the hospital campus and planned transit station.	
	BR-OR District				

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
199	Why does the BR-OR zone restrict computer programming and research?		panels	Additional Review: Staff will review the districts where computer programming uses are permitted and report back to the Planning Commission.	
	<i>BR-ORT District</i>	Use Charts, p. 16-34			
200	Don't include housing in ORT district south of Bel-Red Road		letters 12, 20	The Steering Committee identified housing as an appropriate transition use in this area. The proposed ORT uses, heights, and intensities are generally consistent with the vision for this area to provide transition to the predominantly single family area to the south. The Steering committee explicitly recognized that this area would not be expected to see significant changes resulting from the new plan.	
201	Consider taller heights, higher density in area of Banner Bank near Old Bel-Red Rd.		oral testimony		
202	Concern that the zoning on the south side of Bel-Red (GR-ORT) is not changing very much		panels		
	<i>BR-CR District</i>	Use Charts, p. 16-34			
203	Allow reuse of buildings for small car dealerships in the CR district; consider limits on size of building or parking area		letter 1	Proposed draft provides for auto dealership uses.	
204	Height limit and FAR should be consistent throughout east triangle area; don't split area between RC-3 and CR districts		oral testimony	The split in the east triangle area is consistent with the northern portion's closer proximity to the planned Overlake Transit Station.	
205	Eastern part of the subarea should all have one zoning designation		panels		
206	Consider 75 ft height limits for CR district		letter 43	Additional Review: Staff will review the RC-3, MO, OR, and CR height max for consistency with building code standards and bring this back to the Planning Commission for review. No other review of height limits is proposed.	
207	Restore GC zoning for properties proposed to change to CR, or allow all GC uses		letter 43, 47	Additional Review: Staff will review which properties are proposed to change from GC to CR and report back to the Planning Commission.	
208	Consider 2.5 base FAR for CR district		letter 43	Additional Review: FAR levels have been identified as an item for further review (see FAR section below). Planning Commission directed to change the maximum FAR to 2.0 for the CR district at its 7/2 meeting.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	BR-GC District	Use Charts, p. 16-34			
209	Increase heights in area north of Northup/NE 20 th , isn't necessary as a buffer to neighborhood with topographic change and SR 520		panels	Heights proposed are consistent with the uses and development intensities envisioned.	
210	Base height in GC zone north of Northup and west of 130 th should be increased from 30 ft to 45 ft (consistent with current LI zoning)		panels	Proposed max height is 45 ft.	
211	Expand GC district to include property at 2100 – 124th (SE corner of Northup/124th) rather than OR zone		letter 32	Additional Review: Staff will review the specific area identified and report back to the Planning Commission.	
	BR-RC-3 District	Use Charts, p. 16-34			
212	Height limit should be 75 ft in RC-3 zone (includes Angelo's site)		panels	Additional Review: Staff will review the RC-3, MO, OR, and CR height max for consistency with building code standards and bring this back to the Planning Commission for review. No other review of height limits is proposed.	
	East Triangle Area	Use Charts, p. 16-34			
213	Opposed to taller heights, increased density in east area; don't increase height limit from 60 to 70 ft (Angelos site)		letters 16, 17, 19, 24, 25, 28, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59	Additional Review: Staff proposes increasing the maximum height for a majority of the area from 60 ft to 70 ft to provide greater consistency with other districts in the Subarea. Staff will review the RC-3, MO, OR, and CR height max for consistency with building code standards and bring this back to the Planning Commission for review. The 45' height limit along 156 th , the drop in topography to Bel-Red Rd., and the building separation requirement together will minimize view impacts to the west.	
214	Opposed to including east triangle area in Bel-Red Subarea		letter 20	Including the east triangle area allows the community to plan for an area that will be in close proximity to the planned Overlake Transit Station, that is adjacent to Redmond's Overlake Village area, and that shares many other characteristics to the rest of the Bel-Red area.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	Development Standards	20.25D.120, p. 51			
215	Be careful about the extent of ground-floor retail requirements		panels	Comment recognized	
216	Provide (zoning and tax) incentives for ground-floor retail uses in certain areas		panels	Ground floor retail uses (a portion or all depending on location) are proposed to be FAR exempt.	
217	Comments on framework maps		letter 3, attachment D	Additional Review: Staff will review the design standard maps in greater detail and report back to the Commission.	
	Master Development Plans and Vesting	20.25D.030.B p. 4			
218	Concerned about short vesting period; use 10-year vesting for Master Development Plans		letter 21	The Commission and members of the public have identified a need to review the implementation of the plan after about 5 years to ensure that implementation is proceeding as envisioned and to make refinements as needed. A 10-year vesting period would potentially make this review of Plan implementation moot.	
219	Consider Master Development Plan (MDP) overlay code, with 10-year vesting, revisions to concurrency		letter 21		
	Medical Institution	20.25J			
220	Support for MI district		oral testimony, letter 26	Comment recognized	
221	Hospitals are not permitted in the Office zoning district		letter 13	Proposal is to change the area proposed for Children's Hospital to Medical Institution, which would be consistent with its proposed ambulatory health care use.	
222	Steering Committee recommended area north of 12th be low intensity office/medical office uses; Steering Committee did not recommend hospital use		letter 13	The Steering Committee was not asked to evaluate the specific siting for Children's Hospital. However, the Children's facility is largely consistent with and supportive of medical office uses recommended by the Steering Committee. The MI district is proposed to have the same overall FAR maximum as the Medical Office district. The MI district is now proceeding on a separate, parallel track.	
223	Hospital uses were not evaluated in EIS; impacts have not been fully evaluated		letter 13	The types of impacts that are likely to result from a medical institution use are being considered and	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
224	Reject MI amendments; concerned that proposed hospital district wasn't reviewed in EIS		letter 20	compared to the types of impacts analyzed in the EIS. Anticipated development intensity for the MI district is largely consistent with the medical office use intensity recommended by the Steering Committee. Additional SEPA documentation will be completed if necessary to address potential impacts that weren't previously contemplated. (The SEPA analysis for Bel-Red is at a plan level, and is not in place of project level SEPA review.)	
225	Proposed MI area is isolated from existing Overlake/Group Health campus; consider land east of Overlake/Group Health campus as location for MI		letter 13	The proposed Medical Institution district is directly northeast of the existing hospital campus, in close proximity. Medical Institution District zoning is reserve for medical institutional users. The site directly east of the hospital is not owned by a medical institutional user and cannot be speculatively rezoned for that use.	
	Intensity Levels / FAR	Dimensional chart, p. 35			
226	Greater density will spur redevelopment and investment; need higher FAR; use FAR to stimulate development		multiple oral testimony, letter 41, panels	Additional Review: FAR levels have been identified as an item for further review. Planning Commission review will focus on FAR levels in relationship to the Steering Committee vision and the land use pattern, character and intensity of the area. The financial strategy, including the use of FAR as part of an incentive system will be directly reviewed by the City Council. Base FAR relates to economic modeling and incentive system which is Council's purview. The Planning Commission directed the maximum FAR for the CR and R district to be changed to 2.0 and for the maximum FAR for the MO-1, OR-1, OR-2, RC-1, and RC-2 district be 3.0 at its meeting on 7/2.	
227	Proposed FAR framework will not achieve the Bel-Red vision		panels	"	
228	FAR levels too conservative; higher densities, heights, and FARs are needed		letter 22	"	
229	FAR levels aren't sufficient to accommodate job and housing growth		letter 22	"	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
230	Proposed zoning will result in single story development; unintended consequences of low base FAR		oral testimony, letters 4, 21, panels	"	
231	Base FARs should be increased; base of 1.0 FAR is too low		panels, letter 32	"	
232	Redevelopment won't occur if base FAR is same as existing FAR level		letter 7	"	
233	New development at 0.5 FAR wouldn't necessarily be more "disposable" than 1.0 or 1.5 FAR development		panels	"	
234	Not applying design guidelines below 0.5 FAR is an incentive to develop at that level		panels	"	
235	Max of 1.0 FAR is too low		oral testimony, panels	"	
236	Don't include residential uses in FAR limit		letter 3	"	
237	Near general transit service, base FAR should be 2.5, height limit should be 75 ft		oral testimony, letter 43, panels	"	
238	FARs don't account for structured parking		oral testimony, letter 22	"	
239	Allow to move FAR around overall site		letter 3	"	
240	Development levels of 1.0-2.0 FAR are too low and not pedestrian oriented		oral testimony	"	
241	Proposed heights, FAR, and intensities are excessive		letter 20	"	
242	Development should retain FAR for right-of-way dedications		panels	This is consistent with proposal, which allows for right-of-way that is dedicated to be included in the calculation of FAR.	
243	Will the FAR levels be adjusted after the Council's work on infrastructure funding?		panels	The City Council may make adjustments to the code package, including the FAR levels if needed, including in response to review of the financial strategy.	
244	Use heights and lot coverage to control density (rather than FAR)		letter 22	The use of FAR in addition to heights and lot coverage provides architectural flexibility, encourages creative design, and helps reduce the likelihood of bulky buildings.	
	Stream Restoration				
245	Support for moving Goff Creek to the 132nd right of way; change figure BR.3	Table 3, p. 36	oral testimony, letter 29	Comment recognized	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
246	The vision for relocating Goff Creek near 132 nd appears to impact a number of adjacent properties (maybe scale back the desired buffer a bit)	Table 3, p. 36	panels	The actual buffer achieved for a restored Goff Creek would be determined by a project implementation plan developed at a future stage and that will determine the physical width requirements for opening the stream and may include buffer "averaging" where the buffer distance is greater in some places and smaller in others.	
247	Consider site modifications for side yard setback if money is then dedicated towards parks and/or streams	N/A	panels	Required Bel-Red side yards are typically zero.	
248	How does CAO apply to streams proposed to be daylighted?	N/A	oral testimony	In brief, the City's critical areas regulations would apply to daylighted streams based on a specific restoration plan for that stream section. The starting point is the structure setback established by the code which, for Kelsey tributaries, is 50' or the combined dimension of the critical area buffer and structure setback, whichever is less. Depending on a variety of factors, including pipe depth, fish use, upstream channel configuration, flow velocity and a host of other factors, the actual dimension is best achieved via a science-based restoration plan.	
249	Consider joint stormwater retention areas (managed by the city)	N/A	panels	Comment recognized	
250	City should charge for water they are "biofiltrering" from private developments	N/A	panels	Comment recognized	
251	How will streams be handled as they intersect with the NE 15 th /16 th corridor?	Table 3, p. 36	panels	NE 15th/16th is proposed to bridge the West Tributary. The crossing type at Goff Creek hasn't been identified at this stage, but will be designed to meet fish passage requirements. The stream crossing locations envisioned as significant opportunities for open space amenities along the NE 15 th /16 th corridor.	
252	Recognize stream buffers consistent with critical areas regulations	Table 3, p. 36	letter 29	Comment recognized. The Bel-Red plan and regulations would not modify the adopted critical areas regulations. However, additional setback from streams may be achieved through their participation in incentive zoning or through City acquisition of stream corridor property.	
253	Need an independent assessment and cost analysis of plan to daylight and restore streams	Table 3, p. 36	letter 11	Comment recognized. Greater analysis would occur prior to proceeding with any of the restoration plans.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
254	No demonstrable benefits of stream restoration	Table 3, p. 36	letters 12, 20	Restoring stream sections could have a number of measurable benefits including providing fish habitat (provided barriers can be removed), improving quality of stream water that flows to Lake Washington, and creating urban amenities that enhance the neighborhood character of these redevelopment areas.	
255	Ample opportunities already exist to restore streams and provide open space	N/A	letters 12, 20	This plan recognizes existing opportunities and may help to coordinate stream restoration, open space, and park opportunities to make more efficient use of public investments.	
256	100 ft buffers wouldn't allow for trails or plazas	N/A	letter 29	Trails may be allowed in restored buffer areas that provide a net benefit to the stream function. Trail location and design shall result in the least impacts on critical area and critical area buffer, while complimenting and enhancing the environmental, educational and social functions and values if the critical area.	
257	Photo-sims of streams don't accurately reflect critical areas regulations	N/A	letter 22		
258	Consider "civil pond" to allow for critical areas mitigation bank	N/A	letter 22	Regional detention opportunities could be explored as part of the development of the storm water management planning for the area.	
259	Code doesn't include local TDR for stream restoration as discussed in policy D8	20.25D.150	letter 29	Transfers are provided for in 20.25D.150D. The proposed tier 1 bonuses would provide FAR incentives for restoration of stream areas.	
260	Don't use term "natural drainage systems"	C4	letter 3	"Natural Drainage Systems" was used to differentiate specific drainage practices from the larger "Low Impact Development" options.	
	Tree Retention				
261	Allow "replace in kind" rather than preservation	N/A	letters 22, 41	This comment addresses application of the adopted land use regulations specific to tree preservation and is not directly related to the Bel-Red amendments.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
	Regional TDR				
262	Designate Bel-Red as a regional TDR receiving site; support for D9	D9, p. 14 20.25d.150.C p. 72	multiple oral testimony, letters 3, 33, 35, 61	Additional Review: The draft plan and regulations support future consideration of the regional TDR program. Not enough is known about how the regional TDR program would work to recommend it at this time in particular, how it would be calibrated against other Bel-Red incentives and how it would compete against local environmental improvements. Staff recommends looking at the regional TDR program as a follow-on step after initial adoption. This is scheduled for further discussion on 7/23.	
	Parks	Park and Open Space section, p. 15, Table 2, p. 35			
263	Parks Board endorses the parks, open space, trails, and streams plan and project list		letter 14	Comment recognized	
264	Amount of parks, open space is in excess of need		letters 12, 20	Planned park projects are intended to provide a range of park functions (play areas, active/passive recreation, open space, etc.) at locations distributed throughout the Subarea at a level sufficient to serve the future redevelopment. The Steering Committee's vision is that designated parks are part of a wider open space and recreation system that includes trail corridors, stream enhancements, natural drainage, and other amenities designed as "green infrastructure".	
265	Park and trails aren't sufficient for level of population proposed – should plan for 129 acres of parks and 9.46 miles of trails		letters 11, 20		
266	Move community park C1 from NW corner to a more central location near where West Trib cross NE 15th Street		oral testimony, letter 34	While the exact location of C1 may evolve as the park plan in further developed, it is intended to connect to the BNSF trail and take advantage of natural open space areas along the West Tributary. Park N1 is proposed where the West Trib crosses NE 15th.	
267	Concern that park space near Lake Bellevue would take away parking and impact existing buildings		letter 8	The trailhead proposed near Lake Bellevue will be designed at a future stage.	
268	Most proposed parks are narrow with poor public access		letter 11	The exact location, shape and size of the parks will be determined as specific properties are acquired.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
269	4-acre size of N5 park would consume all developable area at location		letter 29	The exact location, shape and size of the park will be determined as specific properties are acquired.	
270	Are any Bel-Red park investments part of the potential ballot initiative?		panels	No specific park development projects in Bel-Red are considered as part of the potential voter initiative. However, property acquisition in Bel-Red would not be precluded as a use of potential initiative resources.	
271	Bel-Red development should only pay their share for new parks space		panels	Proposed parks will serve a broad range of users inside and outside of the Bel-Red subarea. The level of public and private investment needed to develop the system will be considered in the finance plan for public infrastructure development.	
272	"Rent a roof" concept suggested for use of large roof structures as park space		panels	Inventive idea that could be considered during implementation.	
273	How will new parks (shown on the map) be developed in areas where there are existing businesses/private owned?		panels	The map shows the general location of planned park facilities. The actual location will, in part, be determined by where property becomes available.	
274	Idea of parks/open space/trails investments in partnership with improvements to Metro sites		panels	The City will continue to think creatively about park opportunities, such as the Metro sites.	
275	Concerned about 4-acre size of park N2		letters 3, 21	Additional Review: Staff is evaluating the feasibility of a park this size at this location and will report back to the Planning Commission.	
276	Linear park should not be part of NE 16th Street design		letter 3	Additional Review: The Planning Commission will continue to review options for the design of NE 16th Street.	
	Incentive System	20.25D.150 p.67			
277	Exempt senior housing from incentive system; include bonus for senior housing		multiple oral testimony, letters 2, 36, panels	The incentive system proposed provides a bonus for affordable housing, where there is the greatest need. Senior housing could qualify for that bonus provided that it was provided at an affordable level. It is not recommended to include a bonus for senior housing at higher income levels.	
278	Senior housing is not equally treated with affordable housing		letter 4		
279	Exempt senior housing from affordable housing tier		letters 10, 36, 37, panels		

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
280	Development at 2.5 FAR will result in underground parking, cost of underground parking needs to be acknowledged as expense of development		letter 7	Comment recognized	
281	Use broader range of incentive options		multiple oral testimony, letters 3, 21, 37, panels	The list of bonus options proposed focuses on public priorities – affordable housing, parks and open space – and provides a second tier of other amenities that would provide a more limited public benefit. General characteristics of good building and site design are addressed through the design standards and guidelines, rather than through the incentive system.	
282	Use incentive list similar to Downtown; how does Bel-Red incentive system compare to downtown system?		letter 21, panels		
283	Provide incentives for mid-block connections, pedestrian oriented frontage, master planning.		letter 4		
284	Provide incentive for underground parking		oral testimony, letters 4, 7, 10, 37, 41, panels	It is not clear that there is a public benefit associated with underground parking, provided that above ground parking is appropriately designed and integrated with adjacent land uses.	
285	Include transit facilities in bonus system		oral testimony	Transit facilities could be added to the list of available options. However, the cost of major transit facilities is at such as scale that the proposed bonuses would likely either be ineffective or overwhelm the rest of the incentive program.	
286	Provide bonus for LEED	20.25D.150 p.67	letter 3	LEED gold and platinum incentives are offered.	
287	Allow additional story for affordable housing bonus		oral testimony	Affordable housing is proposed to be in the incentive system, albeit as an FAR bonus rather than an additional floor. Maximum building heights have been subject to considerable analysis and review, based on urban form and compatibility.	
288	Is the affordable housing incentive just applicable to residential developments?		panels	Residential development would be required to use the affordable housing incentive as part of its tier 1 incentives. Commercial developments would have the option of using the affordable housing incentive in tier 2.	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
289	Support for the concept of an incentive system, but details need to be re-worked		panels	The City Council is working to develop a finance plan as part of the Bel-Red planning project. The incentive system and bonus ratios will be directly reviewed by the City Council as part of the finance plan development. Additionally, the City has asked a ULI Technical Assistance Panel to provide an independent review of the incentive system. It is anticipated that the Council will begin review of the proposed incentive system in early September 2008 following the ULI's report.	
290	Proposed incentive system will actually discourage development or will not lead to much redevelopment		panels	"	
291	0.5 FAR base is too low		multiple oral testimony; letters, 3, 4, 5, 29, 41, 44	"	
292	Unintended consequence - proposed incentive system will lead to a lot of 0.5 FAR development with surface parking		panels	"	
	Base FAR should be 1.5		letters 3, 21, 29	"	
293	Base should be 2.5 FAR		oral testimony, letter 37	"	
294	The FAR increment that needs to be earned is too much as compared with the base FAR		panels	"	
295	Consider higher max than 2.5 FAR		multiple oral testimony	"	
296	Incentive rates will prevent development; fees too costly		oral testimony; letters 2, 3, 4, 5, 7, 29, 38, 41	"	
297	Incentive system should be eliminated		panels	"	
298	Base incentives on market conditions; consider financial realities		oral testimony, letters 10, 37, 7, 41, panels	"	
299	Tier system will result in low density development; drop tier system; tier system will hurt development		multiple oral testimony, letters 3, 5, 21, 37, 44	"	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
300	The Tier 1 affordable housing bonus provision is not an incentive to develop		panels	"	
301	Increase value of bonus for catalyst projects		panels	"	
302	Tier 1 affordable housing incentive not financially feasible; Tier 1 affordable housing incentive at \$11-\$55/additional sq ft is too much		panels	"	
303	High land costs in the MI district make it difficult to participate in incentive system		panels	"	
304	Ensure that incentives are provided in the intended area (in/near development)		panels	"	
305	Bonus ratios need to be analyzed along with the developer impact fees		panels	"	
306	Proposal seems more like a tax than an incentive system		panels	"	
307	Use "super incentives" beyond 2.5 FAR and 150 ft height limits		letter 3	"	
308	Allow super incentives to reach 3.5 FAR max (for below grade transit station; TDR; regional bike-share program; power distribution facilities)		letter 21	"	
309	Should allow on-site stream restoration before affordable housing for residential projects where projects are adjacent to streams		letter 29	"	
	Implementation and Infrastructure Financing				
310	Policies related to implementation should be deleted since there is no finance plan	J1-J8	letter 20	The City Council is working to develop a finance plan as part of the Bel-Red planning project. Further discussions will be scheduled with the Council as the work on Bel-Red progresses. Financing issues will not be brought to the Planning Commission.	
311	Infrastructure will cost \$500M in public funding and that doesn't include life-cycle costs; costs will be borne by Bellevue citizens	N/A	letters 12, 20, oral testimony	"	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
312	Be sure costs are allocated fairly	N/A	oral testimony, letter 45	"	
313	Will cost more than cost of land	N/A	oral testimony	"	
314	Funding for phasing should come from properties that are redeveloping	N/A	panels	"	
315	Concept of using upzone value takes value from property	N/A	oral testimony	"	
316	Set aside a fixed amount of tax revenue to finance the plan, similar to tax increment financing	N/A	letter 22, oral testimony	"	
317	Fund existing Downtown transportation plans first	N/A	oral testimony, letter 45	"	
318	Existing businesses should not have to pay for cost of new infrastructure	N/A	oral testimony, panels	"	
319	Existing property owners have paid taxes over the years, while the Bel-Red Subarea is now determined to be underserved by infrastructure. Should there be some type of credit against future fees?	N/A	panels	"	
320	It seems like new development is being asked to pay too much of the new infrastructure costs	N/A	panels	"	
321	Maybe the overall development program is too aggressive based on the overall cost of the infrastructure	N/A	panels	"	
322	Don't use LIDs to fund transportation infrastructure	N/A	panels	"	
323	Use city CIP to fund most of the Bel-Red infrastructure, with balance from new Bel-Red development	N/A	panels	"	
324	Transportation investments will require regional partners (such as WSDOT, Metro, Sound Transit, etc.)	N/A	panels	"	
325	Projects will need to be built with a combination of up-front fees and city expenditure as well as the longer-term revenue stream	N/A	panels	"	

Item #	Comment	Policy/code reference	Comment Reference	Staff Response	Commission Notes
326	Catalyst infrastructure investments (transportation, parks, and streams) are essential in attracting development to the area	N/A	panels	"	
327	Can a comparison be done regarding who pays for new infrastructure in other parts of the city? (such as Downtown, Factoria, Eastgate, Crossroads)	N/A	panels	"	
328	Additional fees and taxes are often just passed on to existing businesses and tenants	N/A	panels	"	
329	How will new parks be financed?	N/A	panels	"	
330	Use Sound Transit authorized taxing ability to fund transportation infrastructure	N/A	oral testimony, letter 43	"	
331	Utilize the incremental increase in taxes from redevelopment	N/A	letter 10	"	
332	Cost estimates of parks and open space are not life-cycle costs	N/A	letter 11	"	
333	Concern regarding impact fees; potential impact fees are too high	N/A	letters 18, 41, 60	"	
334	Use a combination of financing tools (bonds, levies, impact fees, TBD, drainage fees, LID, partnerships, incentives)	N/A	letters 21, 41	"	
335	Transportation should be the top infrastructure priority	N/A	letter 22	"	
336	Don't add new business taxes, B&O or impact fees	N/A	letter 22	"	
337	Use Capital Improvement Plan funds for a major portion of infrastructure costs	N/A	letter 41	"	
338	Concerned about the cost of infrastructure; burden on area	N/A	letters 43, 44, 45	"	
339	Pursue WSDOT funding for SR-520	N/A	letter 43	"	
340	Oppose assessments on existing uses that support new development	N/A	letter 43	"	