



January 31, 2023

Senator Yasmin Trudeau  
Representative Jessica Bateman  
Washington State Legislature  
Olympia, WA 98504

RE: Missing middle housing legislation, HB 1110 and SB 5190

Dear Senator Trudeau and Representative Bateman,

The City of Bellevue appreciates the opportunity to weigh in on SB 5190 and HB 1110. As originally introduced, the City of Bellevue is currently taking a position of Other, and we hope you will consider these comments and requests below with the intention of yielding a better piece of legislation.

Bellevue is a city facing change. We are Washington's fifth largest city, and we are home to an increasingly diverse population, as defined by race, national origin, socio-economic status, and more. Roughly half of Bellevue's population are people of color, and about 43% speak a language other than English at home.

We support the policy drivers behind this bill: the need to plan for growth today and tomorrow, the need to create more capacity for more people to make Bellevue home, particularly those individuals and families whose incomes are below the area median household income. Middle housing is an important tool in achieving these goals.

Our work to update our comprehensive plan is well underway, and we are talking with our community about what that looks like. We are beyond talking about whether or not we plan for growth and new residents; rather, we are talking about the ways in which we'll do so. Part of our City Council vision is "Bellevue: The City Where You Want To Be" and our intention is to find balanced and collaborative ways to incorporate a thriving population that continues to grow.

We ask that the legislature consider a number of changes to improve this bill before moving it forward:

- Regarding citywide zoning: While we think five- and six-plexes, cottage housing, and courtyard apartments are excellent in many residential settings, we think they often aren't consistent in terms of size, form, and aesthetics with many single family neighborhoods. We encourage you to remove those highest intensities from the citywide zoning minimum and instead have the citywide residential standard top out at four units per lot. If cities are required by the bill to authorize four units per residential lot, we would like to maintain local discretion around what form those four units take.



- Regarding zoning adjacent to transit: Bellevue has a transit-oriented growth strategy and is planning for much higher density in areas adjacent to most future light rail stations. Because the legislation has a citywide blanket approach, it could be misinterpreted that 6 units per lot near transit could be seen a ceiling and not a floor. We encourage legislators to change the bill to better utilize the tremendous transit-oriented development potential adjacent to many future light rail and BRT stations.
- Regarding parking: Bellevue uses a scaled approach to parking requirements based on the lot's proximity to frequent transit, and we would recommend modifying the bill to use similar approaches, such as using local parking inventory or needs assessments.
- Regarding affordability: Based on our experience, the bill's requirements regarding affordability will not provide sufficient incentive to result in a significant amount of new affordable units. To impact affordability more effectively, the legislature should make significant investments through the state biennial budgets to fund new and established programs to aid local governments and non-profit organizations in creating and preserving low-income housing units.
- Regarding critical areas: Cities include complex land areas and topography, and this bill currently makes little accommodation for critical areas and other spaces inappropriate for development.
- Regarding infrastructure impacts: Our city is fortunate in the sense that we are well-equipped for much of the growth we're already planning for. But even in a city like Bellevue, we are concerned about the impact of this additional growth on our aging infrastructure. If this growth were realized today, however, we are concerned we would not be able to support those basic levels of service. Cities are often not in control of utility service, and the process in the bill for a delay does not adequately address this critical dependency.
- Regarding the state department approval: Section 4 of the bill is not clear about the role of the State in this process. For our city and some of our colleague cities who are working to plan for growth, Bellevue requests clarity of section 4(3)b to give better guidance of what would qualify as development regulations that are substantially similar to the requirements of the act. What is the avenue for cities to achieve equivalent outcomes but not necessarily do so in the precise fashion specified in the legislation? We seek additional clarity about whether the process in Section 4 represents an alternative way to achieve the bill's intended outcomes or a means of evaluating compliance with the act.
- Regarding resources: We know that this legislation is focused on policy change. But what will be critical for this to work upon implementation is state funding for municipal infrastructure and for affordable housing, including homeownership. We want to be a big part of the solution in providing more housing, more types of housing, and more affordable housing for Washingtonians. But without funding to sustainably support this growth, we will set ourselves up to fail.

To be clear, our goal is to make this bill better so that we can implement it successfully at the local level. We want a final product that cities of different sizes and shapes can see themselves in, that reflects the complexities that exist at the local level.



We recognize that the bill's proponents have good intentions, but we ask that you to listen to the constructive input you are receiving from cities. If the legislature adopts a bill that can't be effectively executed, we won't get the outcomes our communities truly need. The stakes are too high to get this wrong, so let's instead do the hard work and get it right.

Our in-house subject matter experts and contract government relations staff are ready and eager to be resources to you as you continue through the deliberative legislative process. Thank you for your consideration.

Lynne Robinson, Mayor of Bellevue