

2019 Annual Threshold Review Comprehensive Plan Amendment
Recommendation and Consideration of Geographic Scoping
Site-Specific Amendment

The Park in Bellevue

Staff Recommendation: *Do not include* The Park in Bellevue Comprehensive Plan Amendment in the 2019 annual work program.

Application Number: 19-104143 AC

Subarea: North Bellevue

Original Addresses: 1515 Bellevue Way NE

Applicant: Continental Properties Inc.

PROPOSAL

Threshold Review is the first step in Bellevue’s two-part plan amendment review process. Its purpose is to determine which amendments should be included in the annual Comprehensive Plan Amendment work program. If included, the next step for the application would be Final Review evaluation and decision with another staff review, Planning Commission public hearing, and City Council action.

The Park in Bellevue CPA 19-104143 AC

This privately-initiated application proposes one site-specific amendment to the 9.4-acre site at 1515 Bellevue Way NE in the North Bellevue Subarea from Multifamily-Medium (MF-M) to a Comprehensive Plan designation— Multifamily-Urban Residential (MF-UR). This designation does not exist in the Comprehensive Plan. See Attachment 1.

This application also proposes two non-site-specific amendments to the Bellevue Comprehensive Plan Glossary to add a Multifamily-Urban Residential (MF-UR) definition (allowing more than 30 units per acre), and to delete Policy S-NB-39 (Attachment 3) in the North Bellevue Subarea Plan providing for conditions on any rezone in the vicinity of the intersection of Bellevue Way NE and NE 12th Street to minimize the impact of any development of adjoining single-family areas.

NOTE: *Only the Planning Commission, City Council, or Development Services Director can initiate amendments to the text of the Land Use Code (LUC 20.30J). The following text is provided here as an informational courtesy:*

The applicant also requested the city initiate a Land Use Code Amendment to establish an “R-110” zone that would be consistent with an MF-UR designation under the Growth Management Act, allowing up to 110 units per acre, with a maximum building height of 75 feet, and amending LUC Sections 20.10.220, 20.10.440, 20.10.010 and 20.25B.

The application states that “the land use context of the Northwest (sic) Bellevue Subarea Plan has changed dramatically due to the upcoming introduction of regional light rail to Downtown, explosion of growth in Downtown Bellevue...[a] need to provide a diversity of housing options and new housing capacity has reached an urgent level due to unanticipated sharp rises in population and housing costs in the City and King County” with the result that “redevelopment of the property is currently limited by the current MF-M designation of the property because the designation is not consistent with higher-density residential zoning adjacent to Downtown Bellevue.”



The application concludes then, that “The MF-M designation...is not sufficient to maximize the quality of life, economic, and efficiency benefits inherent to the property’s location adjacent to the major commercial, employment, and transportation center of Downtown Bellevue.” See Attachment 2.

OVERVIEW OF STAFF RECOMMENDATION

Staff recommends not including this proposed amendment in the 2019 work program because the application does not meet Land Use Code decision criteria for Threshold Review of a privately-initiated Comprehensive Plan Amendment (LUC 20.30I.140). In particular, that the following decision criteria are not met:

Threshold Review Decision Criteria	Meets/Does Not Meet
A – Appropriately addressed through Plan	Does Not Meet
B – Compliance with three-year limit	Meets
C – Does not raise policy issues outside CPA	Does Not Meet
D – Reasonably reviewed with resources	Does Not Meet
E – Addresses significantly changed conditions	Does Not Meet
F – Expand Geographic Scope	Meets
G – Consistent with current general Plan policies	Does Not Meet
H – State law, court or admin decision requires it	N/A

BACKGROUND

The site contains 184 multifamily housing units and is built out at its R-20 zoned density.

Staff recommends not expanding the geographic scope of the proposal. The Planning Commission at its March 13 study session agreed; the application and staff report reflect that.

THRESHOLD REVIEW DECISION CRITERIA

The Threshold Review Decision Criteria for a proposed Comprehensive Plan Amendment are set forth in the Land Use Code in Section 20.30I.140. A proposal must meet all of the criteria to be included in the annual work program. Community Development staff has concluded that the proposal should *not be included* in the annual work program. This conclusion is based on the following:

- A. *The proposed amendment presents a matter appropriately addressed through the Comprehensive Plan; and*

The proposal does not present such a matter.

Premature to consider Plan as appropriate place

Combining land use issues of such complexity as these has been accomplished through City Council direction on major land use and transportation initiatives, with extensive public engagement demanded by the GMA, and with a SEPA focus on thorough environmental analysis. We know right away that a new designation—one so open-ended as to be defined as “anything over 30 DU” would create potential impacts well outside of the annual amendment process, a process that exists to raise questions of appropriate density inside of the existing framework of the Comprehensive Plan.

Staff measured this criterion against the predictability and stability sought by the Plan along with Citizen Engagement policy direction. Such appropriateness might be addressed only after engaging in the wide-area citizen engagement called for by these policies. The combination of non-existent Plan designation, new and open-ended Glossary definition, and just to make sure—new Land Use Code definition and zone—make it premature to consider the Plan as the appropriate place, without first implementing Citizen Engagement policy at CE-2, CE-7, and CE-8:

- **CE-2** Consider the interests of the entire community and the goals and policies of the Plan before making land use decisions. Proponents of change in land use should demonstrate that the proposed change responds to the interests and changed needs of the entire city, balanced with the interests of the neighborhoods most directly impacted by the project.
- **CE-7** Prepare a public involvement program that is tailored to effectively and efficiently involve the public in major revisions to the general elements and subarea plans of the Comprehensive Plan. Utilize citizen advisory committees or other methods that represent a broad spectrum of viewpoints as part of the public involvement program.
- **CE-8** Encourage community involvement through master planning of large public projects to provide a predictable review process.

B. *The proposed amendment is in compliance with the three-year limitation rules set forth in LUC 20.30I.130.A.2.d; and*

The proposed amendment is in compliance. The Park in Bellevue has not previously applied for a proposed plan amendment.

C. *The proposed amendment does not raise policy or a land use issues that are more appropriately addressed by an ongoing work program approved by the City Council; and*

Ten-year major plan update

The annual amendment process exists to amend within existing map and policy frameworks. Proposing a designation and zone that do not exist in the Plan is an action that could only be addressed in the larger, citywide 10-year major plan update process because that is when we take on things we haven't done before.

However, the larger issue of locating Downtown-level densities outside of the Downtown (or outside of any of the other designated growth centers) is a topic that is unlikely to become part of an ongoing work program approved by the City Council.

The proposal is inconsistent with the outsized role that community engagement, and stability and predictability emphasized by the plan play in comprehensive planning decisions. Deciding where lines are drawn always has citywide ramifications; the city continues to effectively use the plan amendment process to address geographic proximity and transition uses *within existing development areas (emphasis added.)*

D. *The proposed amendment can be reasonably reviewed within the resources and timeframe of the Annual Comprehensive Plan Amendment Work Program; and*

Staff determines this proposed amendment cannot be reasonably reviewed.

Plan designation that does not exist needs analysis outside the annual scope

The proposal could not be reasonably reviewed within the resources and timeframe of the annual CPA work program due to the proposed new Plan designation and definition. The additional requirement amending the Land Use Code to allow an "R-110" zone to be able to implement an MF-UR designation and glossary term, and proposal to delete existing Subarea Plan policy on the premise that the policy is no longer needed are topics outside of the scope of the annual plan amendment process, properly belonging to the Land Use Code Amendment and Great Neighborhoods subarea planning process, respectively. Their community engagement efforts fall outside of the annual plan amendment's schedule scope.

That preliminary geographic scoping analysis suggested up to 5,000 new housing units of capacity just in this one area, with 1,000+ just on the Park in Bellevue site, up from 184, emphasizes that we need to understand

these kind of environmental impacts citywide, and not just where someone needs a spot zoning. Plan implementation has worked precisely because a line limit does matter when it is a house on one side and a downtown office building on the other, and have put mitigation tools in place such as Downtown perimeter and transition standards.

- E. *The proposal addresses significantly changed conditions on the subject property or its surrounding area where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole.*

Significantly changed conditions. *Demonstrating evidence of change such as 1) unanticipated consequences of an adopted policy, or 2) changed conditions on the subject property or its surrounding area, or 3) changes related to the pertinent Plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole. This definition applies only to Part 20.30I Amendment and Review of the Comprehensive Plan (LUC 20.50.046); and*

No change in growth strategy

The application does not demonstrate significantly changed conditions on the site or its surrounding area. The City-wide Comprehensive Plan update was adopted by the City Council in 2015. It lays out the City's overall growth strategy specifically in the Land Use, Economic Development, and Neighborhood Elements. Placing more Downtown-levels growth on this site outside of the Downtown (doesn't matter how close) is not part of that overarching strategy, of managing growth and development while working to protect and enhance neighborhoods.

The context of the issue for this proposed amendment is proposing a designation that does not exist in the Plan. The proposed amendment does not demonstrate evidence of significant change due to the unanticipated consequences of an adopted policy—that the upcoming introduction of regional light rail to Downtown, an “explosion of growth” in Downtown Bellevue, and the need to provide new housing that has reached an urgent level—have somehow not been anticipated by the Plan. Aging buildings do not represent significantly changed conditions on the subject property or in its surrounding area. Deleting an important subarea policy (S-NB-39) would only be a change related to the pertinent Plan map or text if the deletion had occurred through a subarea planning process or separate amendment.

- F. *When expansion of the geographic scope of an amendment proposal is being considered, shared characteristics with nearby, similarly-situated property have been identified and the expansion is the minimum necessary to include properties with those shared characteristics; and*

Staff recommends no expansion of geographic scope. The site is on the west side of Bellevue Way about 500 feet north of the Downtown boundary. At first glance, it seems that properties to the north, east and south of the site share similar low, medium, and high multifamily land uses—a density characteristic of multifamily that is outside of the Downtown. All of the properties in turn, including the site, also share some boundary with areas of single-family built land use densities.

Similarly-shared characteristics are more than land use, though. The application signals a readiness for site redevelopment that has not been indicated by the other nearby multifamily sites. Were a conclusion to be reached that a shared multifamily land use designation alone is grounds for expansion of the geographic scope of the proposal, we would have to anticipate that the existing 184 housing units on the site under the existing designation would expand to a 1,034-housing unit capacity outcome under an MF-UR designation at the density contemplated by the requested LUCA. A proposal geographically expanded to the approximately 47 acres included in all of the multifamily designations—situated similarly by land use and proximity to single family land use densities—would further expand the existing 751 housing units to a 5,170-housing unit

capacity. This potential outcome is not what “the minimum necessary” language intended for expanding the geographic scope of a plan amendment proposal.

- G. *The proposed amendment is consistent with current general policies in the Comp Plan for site-specific amendment proposals. The proposal must also be consistent with policy implementation in the Countywide Planning Policies (CPP), the Growth Management Act, other state or federal law, and the Washington Administrative Code; or*

The proposed amendment(s) are inconsistent with current general policies and with CPP policy implementation.

The focus of the Land Use Element—the *foundational* part in the Plan’s foundational policy document role, balances growth through various policies and maps, drawing a line both literally and figuratively to enforce what the communities mean about appropriate growth in appropriate places.

Plan growth geography and the bright line

Reflecting Plan implementation, growth boundaries such as [the] Urban Growth Boundary, subareas like BelRed, and the defined Urban Center that is Bellevue’s Downtown (or Redmond’s Overlake), exist in fact and not just in desire. These boundaries exist to inform and direct development to the most appropriate areas and limit development beyond those areas. The boundary is a geographic delineation which marks the separation of areas where more intense development is appropriate from those where it isn’t appropriate.

Growth boundaries direct growth to locations where it is desired and will be supported by necessary infrastructure, facilities and services. Its advantages are many, including but not limited to preservation of community character, promotion of efficient and cost-effective infrastructure, and indications to property owners, developers, and the public which land is most appropriate for development.

• **Goal of the LU Element and LU-1**

It is the goal of the Land Use Element to maintain a land use pattern that protects natural systems and retains trees and open space; maintains and strengthens the vitality, quality and character of Bellevue’s neighborhoods; and focuses development activity in Downtown and other commercial and residential centers.

LU-1. Promote a clear strategy for focusing the city’s growth and development as follows:

1. Direct most of the city’s growth to the Downtown regional growth center and to other areas designated for compact, mixed use development served by a full range of transportation options.
2. Enhance the health and vitality of existing single family and multifamily neighborhoods.
3. Continue to provide for commercial use and development that serve community needs.

Land Use Element p. 37. Bellevue has sufficient land capacity to accommodate about 23,000 additional housing units and about 83,300 jobs, giving it more than enough capacity to meet its projected growth to 2035. About half of future housing and job growth is planned for Downtown Bellevue...

Land Use Element p. 46. Bellevue’s land use pattern creates sufficient land capacity to achieve growth targets, while directing growth to appropriate areas.

Successful and unsuccessful Downtown amendments

Where the plan amendment process has treated attempts to successfully amend the Downtown boundary (2015, Southern Boundary adjustments Ordinance No 6251; and 2017, 10777 Main Ordinance No. 6394) it has done so with recognition of the existing boundary framework around existing zones. Where the plan amendment process has treated attempts to unsuccessfully amend the Downtown boundary (a 2013 proposed amendment “Encouraging transit-appropriate development densities in existing non-Downtown

OLB commercial districts adjacent to Downtown” 13-106261 AC—was withdrawn by the applicant) it has done so noting that non-existent designations need more than an annual plan amendment pass.

Consequence of eliminating subarea plan policy direction

Finally, eliminating an existing policy specifically applicable to any development or redevelopment, and designed to mitigate impacts to single-family neighborhoods does not enhance the health and vitality of existing single family and multifamily neighborhoods

and:

H. State law requires, or a decision of a court or administrative agency has directed such a change.

State law or a decision of a court or administrative agency has not directed the suggested change.

PUBLIC NOTICE AND COMMENT

The 2019 annual proposed amendments were introduced to the Planning Commission with a February 27 introductory study session, and a March 13 study session examining the potential expansion of geographic scope for each of the privately-initiated applications.

Notice of the Application was published in the Weekly Permit Bulletin on February 21 and mailed and posted as required by LUC 20.35.420. Notice of the April 24 Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on April 4 and included notice sent to parties of interest. Owners and residents within the 500-foot noticing perimeter of the site receive official notice, as did people signed up to receive such notices.

Ten public comments have been submitted on this application to date. Two comments were for information; the remaining eight expressed specific objections to the proposed amendment regarding building height and bulk, and the idea of location such density outside of Downtown. See Attachment C.

Effective community engagement, outreach, and public comments at Threshold Review

Applicants, residents, and communities are engaging across a variety of media in proactive public participation during the 2019 annual review process. The city’s early and continuous community engagement includes:

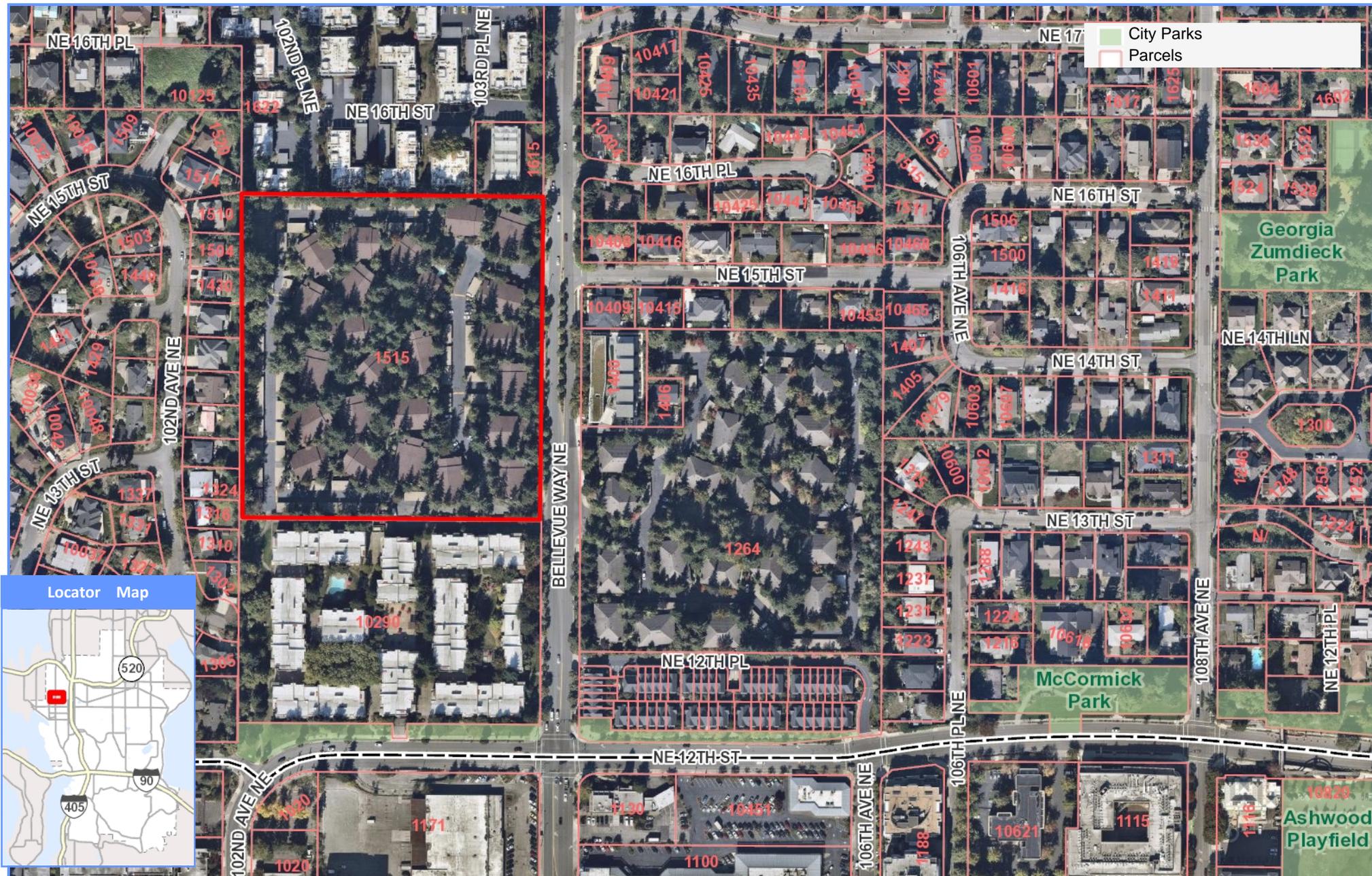
- Responsive early outreach to requests for information and to become parties of interest
- Responding in writing to each written public comment submitted and returning phone calls
- Expanded web page material at Comprehensive Plan Amendments with the review schedule, the applications list, and a “What’s Next” timeline
- A February 27 “Comprehensive Plan Amendment Overview” Planning Commission study session
- A March 13 “Introductory and statutory process review” Planning Commission study session
- “Drop-in” CPA sessions at Mini City Hall on March 22 (nine individuals) and March 25 (four individuals)
- Official Weekly Permit Bulletin notice

Public comments come in throughout the process. All written comments are included in the public record, for reference and for use by decision-makers. At the various steps, the comments are included in their original form to the Planning Commission, and are posted on the web site.

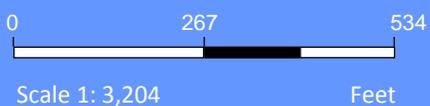
The next step in this continuous public engagement process includes the City Council’s agenda item establishing the annual work program. After that, the city will take any proposed amendments out into the various neighborhoods for discussion during Final Review evaluation.

ATTACHMENTS

1. Site map
2. Application materials
3. North Bellevue Subarea Plan Policy S-NB-39
4. [Public Comments](#) (online)



The Park in Bellevue CPA



DOCUMENT ROUTING FORM

Routed On: 01/31/2019
Prepared by: ROH

Folder: 19 104143 AC

Target Date: 05/31/2019

Folder Name: The Park in Bellevue

Site Address: 1515 Bellevue Way NEsite

Folder Type: Comprehensive Plan Amendment

Sub Type: Private

Work Proposed: Site Specific

Description: Predesignate

Quick Review?:

Project Contact: McCullough Hill Leary Jack McCullough

Phone: (206) 812-3388

Subject: Application Intake Process

Materials Routed:

Routed On: 01/31/2019

XXX Land Use

XXX Utilities

XXX Transportation

XXX Policy Planning



CPA YEAR 20 <u>19</u> APPLICATION DATE:	TECH INITIALS <u>MM</u>	AMANDA PROJECT FILE: <u>19-104143 AC</u>
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- Project name The Park in Bellevue ~~Agent name~~ Jack McCullough
- Applicant name 1515 Bellevue Way LP Agent name Jack McCullough
- Applicant address 600 108th Avenue NE - ste. 1010, Bellevue, WA 98004
- Applicant telephone (425) 462-0700 fax (425) 462-0760 e-mail esegat@cp-re.com
- Agent telephone (206) 812-3388 fax () e-mail jack@mhseattle.com

This is a proposal to initiate a site-specific Comprehensive Plan Amendment proposal (Go to **Block 1**)
 This is a proposal to initiate a non site-specific Comprehensive Plan Amendment proposal (Go to **Block 2**)

BLOCK 1

Property address and/or 10-digit King County parcel number 1515 Bellevue Way NE
Parcel No. 2925059100
 Proposed amendment to change the map designation from existing MF-M to proposed MF-UR
 Site area (in acres or square feet) approx. 9.4 acres
 Subarea name Northwest Bellevue Subarea
 Last date the Comprehensive Plan designation was considered ___/___/___ N/A
 Current land use district (zoning) R-20
 Is this a concurrent rezone application? Yes No Proposed land use district designation R-110

Go to **BLOCK 3**

Community Council: N/A East Bellevue

BLOCK 2

Proposed amendment language. This can be either conceptual or specific amendatory language; but please be as specific as possible so that your proposal can be adequately evaluated. If specific wording changes are proposed, this should be shown in strike-out/underline format. Attach additional pages as needed.

PLEASE SEE ATTACHED DOCUMENTS.

Reference Element of the Comprehensive Plan (e.g., Land Use, Transportation, Housing, Capital Facilities):

Last date the Comprehensive Plan policy or text was considered ___/___/___ N/A

Go to **BLOCK 3**



BLOCK 3

Support for the proposed amendment. Explain the need for the amendment—why is it being proposed? Describe how the amendment is consistent with the Comprehensive Plan Vision (Web link). Include any data, research, or reasoning that supports the proposed amendment. Attach additional pages as needed.

PLEASE SEE ATTACHED DOCUMENTS .

Go to **BLOCK 4**

BLOCK 4a

Evaluating the proposed amendment. Explain how the proposed amendment is consistent with the Threshold Review Decision Criteria in LUC Section 20.30I.140 (see Submittal Requirements Bulletin #53). Attach additional pages as needed.

PLEASE SEE ATTACHED DOCUMENTS .

BLOCK 4b complete this section only for a site-specific concurrent rezone

Evaluating the proposed concurrent rezone. Explain how the proposed rezone would be reviewed under Rezoning Decision Criteria in Land Use Code Section 20.30A.140. Attach additional pages as needed.

PLEASE SEE CONCURRENT REZONE APPLICATION

I have read the Comprehensive Plan and Procedures Guide

NOTICE OF COMPLETENESS: Your application is considered complete 29 days after submittal, unless otherwise notified.

Signature of applicant  Date 1-30-19

(manager)

I certify that I am the owner or owner's authorized agent. If acting as an authorized agent, I further certify that I am authorized to act as the Owner's agent regarding the property at the above-referenced address for the purpose of filing applications for decisions, permits, or review under the Land Use Code and other applicable Bellevue City Codes and I have full power and authority to perform on behalf of the Owner all acts required to enable the City to process and review such applications.

I certify that the information on this application is true and correct and that the applicable requirements of the City of Bellevue, RCW, and the State Environmental Policy Act (SEPA) will be met.

Signature  Date 1-30-19

(Owner or Owner's Agent)

(manager)

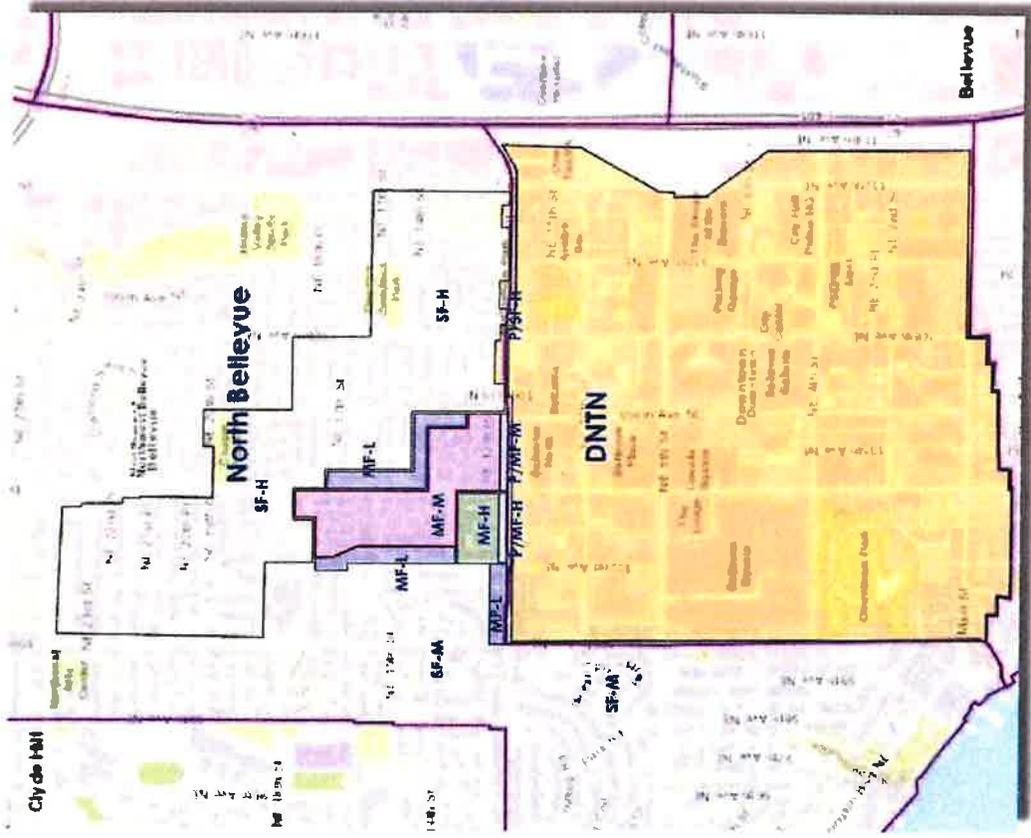
Comprehensive Plan Amendment



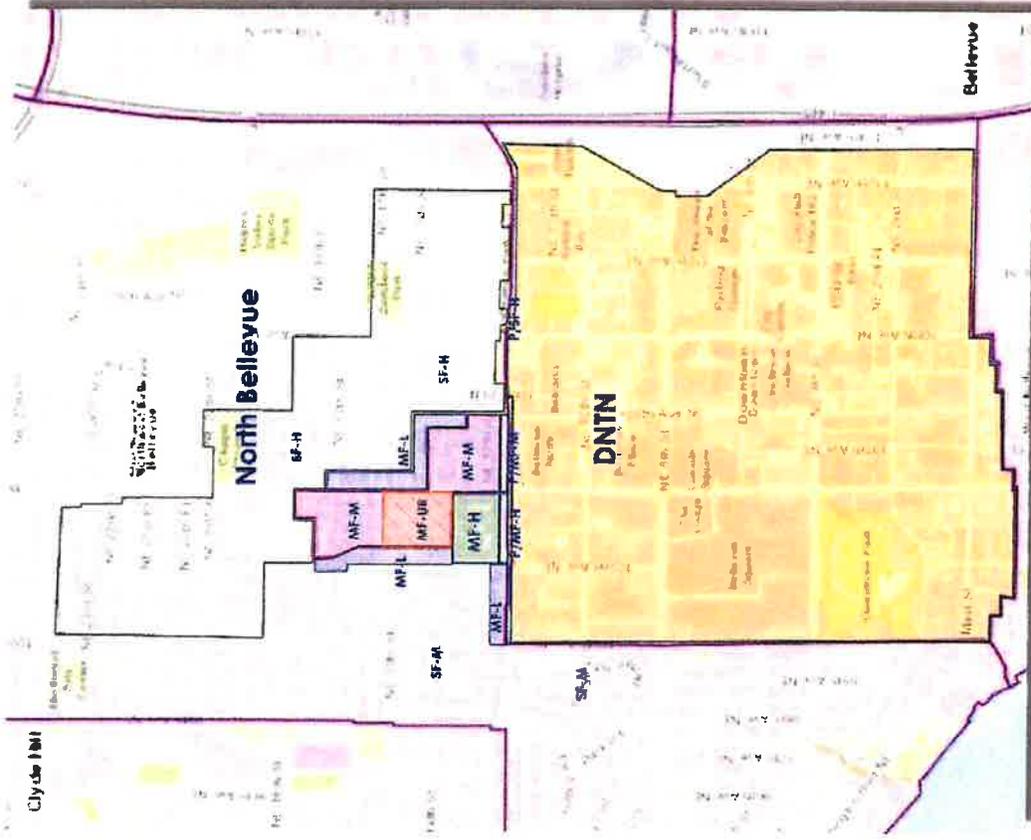
Vicinity Map

1515 Bellevue Way

Comprehensive Plan Amendment – Land Use Map



Existing Land Use Designations



Proposed Land Use Designations

CITY OF BELLEVUE
COMPREHENSIVE PLAN AMENDMENT APPLICATION

Applicant/Owner: 1515 Bellevue Way, LP

Property: “The Park in Bellevue” apartments, 1515 Bellevue Way NE, Bellevue, WA

Introduction.

This application for an amendment to the City of Bellevue (“City”) Comprehensive Plan has four components: (i) a site-specific amendment to change the Land Use Map, (ii) a non-site-specific text amendment to the Glossary Element of the Comprehensive Plan, (iii) policy amendments to the North[west] Bellevue Subarea Plan (the “NW Subarea Plan”), and (iv) a text amendment to the Land Use Code to establish the required implementing development regulation to support the non-site-specific text amendment (collectively, the “Proposal”). Please also see the Applicant’s Rezone Application filed concurrently with this Comprehensive Plan Amendment application.

The site-specific amendment request applies to “The Park in Bellevue,” an apartment community located at 1515 Bellevue Way NE (Parcel No. 2925059100) (the “Property”) near Downtown in the Northwest Bellevue Subarea. The Property comprises an area of approximately 9.4 acres and is developed with 23 multifamily residential buildings containing a total of 184 dwelling units.

The Property is developed with aging multifamily buildings that are in need of reinvestment. The owners must soon make a capital investment in the Property and are actively assessing whether to (i) focus resources on maintaining the existing buildings, which would extend the life of the buildings for another 20 or 30 years but would defer the redevelopment and enhancement of the Property until at least the end of that period, or (ii) pursue a vision of redeveloping the Property with a new, high-quality residential product. The Proposal, if approved, would make possible the latter option.

The owner of the apartments located adjacent to the south of the Property supports the Proposal and is open to the possibility of being included in the Proposal if the City deems it appropriate.

Block 1. Property Details and Proposed Site-Specific CPA.

[Please see property details in the attached “Application for Comprehensive Plan Amendment.”]

The current Comprehensive Plan land use designation for the Property is “Multifamily-Medium Density” (MF-M). Adjacent properties are designated MF-M, Multifamily-High Density (MF-H), and Multifamily-Low Density (MF-L). Other nearby properties are designated Single Family-Medium Density (SF-M) and Single Family-High Density (SF-H).

The desired Comprehensive Plan land use designation for the Property is the proposed “Multifamily-Urban Residential” (MF-UR). “Multifamily-Urban Residential” is not currently a

defined term in the Comprehensive Plan. Please see Block 2 for a proposed text amendment to establish “Multifamily-Urban Residential” as a newly defined term.

Block 2. Proposed Non-Site-Specific Text Amendments.

(i) Text Amendment to the Glossary Element. The Applicant proposes a non-site-specific text amendment to the Glossary Element contained in the Comprehensive Plan. The Proposal would establish “Multifamily-Urban Residential” (MF-UR) as a defined term meaning: “A residential land use designation allowing more than 30 dwelling units per acre.” The new text would be added to the Glossary Element of the Comprehensive Plan. The text of the detailed “North Bellevue Land Use Plan” map (see p. 229 of the NW Subarea Plan) would not need to be amended to include the new MF-UR term, as the map legend already provides for such a suffix.

(ii) Policy Amendment to the NW Subarea Plan. The Applicant proposes that Policy S-NB-39 be deleted (see NW Subarea Plan at 227-228). The policy was adopted and implemented years ago for the area located near the intersection of Bellevue Way NE and NE 12th Street to regulate parcels that have long-since been developed. During the time since Policy S-NB-39 was adopted, the land use context of the intersection of Bellevue Way N.E. and N.E. 12th Street has changed dramatically due to the upcoming introduction of regional light rail to Downtown in 2023, explosion of growth in Downtown Bellevue, and the City’s Downtown rezoning in 2017. Further, the Transition Area Design District ordinance (LUC 20.25B) provides development standards for transitions between different residential use types.

The full text of Policy S-NB-39 is included below for reference.

POLICY S-NB-39. Provide for conditions on any rezone in the vicinity of the intersection of Bellevue Way N.E. and N.E. 12th to minimize the impact of any development of adjoining single-family residential areas. Conditions to be included are:

- Development should appear residential in character by reducing the density and through scale and design features. This would include designing smaller, more highly detailed buildings rather than massive, bulky buildings of an institutional character.
- Orient structures toward major arterials with parking or vehicular circulation oriented toward the interior of development so that it is not visible from public right-of-way or residential areas.
- Incorporate identifiable space and existing pedestrian routes within the site development to provide for pedestrian traffic between buildings, from parking areas to buildings, and to adjacent streets.
- Coordinate development between offices and office and multifamily developments with respect to access points, pedestrian traffic, and parking.
- Incorporate solid sight screening for all roof- or ground-mounted mechanical equipment such that it cannot be seen from any abutting street, walkway, or single-family residential property.

(iii) Land Use Code Text Amendment. The Applicant respectfully requests a text amendment to the Land Use Code to establish a new “R-110” multifamily residential zoning classification. Currently, multifamily residential districts are limited in the City to R-10, R-15, R-20, and R-30 which correspond, respectively, to 10, 15, 20, and 30 dwelling units per acre. The Applicant’s text amendment request would establish a new “R-110” zone to accommodate greater multifamily residential density where appropriate. If the text amendment were approved, LUC 20.10.220 would read as shown below.

LUC 20.10.220. Multifamily Residential Districts provide areas for attached residential dwellings of low density (10 units per acre), ~~and of moderate density (15, 20, and 30 units per acre), and high density (110 dwelling units per acre).~~ The R-20, ~~and R-30, and R-110~~ Districts are intended to be convenient to centers of employment and have primary access to arterial streets. The R-10 and R-15 Districts are more restrictive and may be utilized as a buffer between Suburban Residential Districts and moderate density residential or commercial districts.

If the text of LUC 20.10.220 were amended as requested, other pertinent provisions would need to be amended to include the new “R-110” classification, including LUC 20.10.440 (Land Use Chart), LUC 20.20.010 (Dimensional Requirements Chart), and LUC 20.25B (Transition Area Design District). The Applicant proposes a maximum building height of 75 feet in R-110 zones.

Block 3. Support for the Proposed Amendments.

The proposed non-site-specific amendment to establish a new “Multifamily-Urban Residential” (“MF-UR”) land use designation is appropriate to enhance the range of housing options available in the City and allow densities of more than 30 dwelling units per acre where appropriate.

The proposed site-specific amendment to change the land use designation of the Property from “Multifamily-Medium Density” to MF-UR would support a potential rezoning and redevelopment of the Property consistent with the City of Bellevue Comprehensive Plan objectives.

Redevelopment of the Property is currently limited by the current MF-M designation of the Property because the designation is not consistent with higher-density residential zoning classifications that are appropriate for property that is located adjacent to Downtown Bellevue. The MF-M designation allows up to 20 dwelling units per acre, which is not sufficient to maximize the quality of life, economic, and efficiency benefits inherent to the Property’s location adjacent to the major commercial, employment, and transportation center of Downtown Bellevue.

NW Subarea Plan Policies.

The Proposal supports the goals and policies contained in the NW Subarea Plan.

The Proposal supports the overarching NW Subarea Plan land use goal to “protect the predominantly single-family character of North Bellevue from encroachment by other uses.” NW Subarea Plan at 223. The Proposal would protect against such encroachment because the Property

is already developed with multifamily residential use and has been so developed for approximately 35 years. Therefore, the Proposal is consistent with the NW Subarea Plan land use goal of protecting single-family uses.

In furtherance of the land use goal, the NW Subarea Plan contains policy to (i) encourage reinvestment in existing housing stock (“protect single-family residential areas through the rehabilitation and maintenance of the existing housing stock and other methods” (Policy S-NB-1)) and (ii) provide scale-down of multifamily development “as it approaches single-family areas so as to create an appropriate transition” (Policy S-NB-3). The Proposal is consistent with both of these policies. If approved, the Proposal would facilitate reinvestment in an existing multifamily use and preserve existing single-family housing. The Proposal would also maintain an appropriate transition between Downtown Bellevue and existing single-family areas, as the Land Use Code ensures appropriate transitions through its Transition Area Design District provisions (LUC 20.25B).

The NW Subarea Plan economic goal is “to encourage reinvestment in established residential neighborhoods to maintain and preserve the economic life of the existing housing stock.” NW Subarea Plan at 224. The Proposal, if approved, would support this goal by facilitating reinvestment in an established residential community.

The NW Subarea Plan residential goal is “to encourage an expanded supply of housing through new construction, restoration, or the reasonable conversion of existing units while protecting the livability of existing neighborhoods.” NW Subarea Plan at 224. The Proposal, if approved, would support this goal by facilitating an expanded supply of housing through new construction without encroaching on existing neighborhoods.

In furtherance of the residential goal, the NW Subarea Plan contains policy “encourag[ing] a variety of housing densities and types of residential areas” and “provid[ing] for development of multifamily densities.” Policies S-NB-12, S-NB-14. The Proposal, if approved, would be consistent with Policies S-NB-12 and S-NB-14 by enhancing the variety of housing densities and types of residential areas by facilitating new, high quality multifamily housing.

City of Bellevue Comprehensive Plan Policies.

The Proposal supports the broader goals and policies contained in the City of Bellevue Comprehensive Plan.

The Proposal is consistent with two of the City’s overarching land use goals: (i) enhance the vitality of existing multifamily residential neighborhoods and (ii) direct most of the City’s growth to Downtown and other areas designed for compact development. LU Element at 41. The Proposal, if approved, would support these goals by facilitating a potential redevelopment of the Property, which would enhance the vitality of existing multifamily residential use and direct forecasted population growth adjacent to the Downtown area.

The Proposal is consistent with Comprehensive Plan policy designed to accommodate forecasted population growth through new residential development. Policy LU-3 requires the City to accommodate adopted growth targets of 17,000 additional housing units between 2006 and 2031.

Policy LU-6 encourages new residential development to maximize allowed density. The Proposal would enhance the potential for the Property to help the City accommodate forecasted growth.

The Proposal is consistent with City policy designed to improve access to housing and enhance housing options. Policy LU-15 states, “Provide, through land use regulation, the potential for a broad range of housing choices to meet the changing needs of the community.” Policy HO-11 encourages housing opportunities in mixed residential/commercial settings throughout the City. Policy HO-12 is designed to encourage residential development “for a range of household types and income levels in multifamily . . . zones.” The Proposal, if approved, would support Policies LU-15, HO-11, and HO-12 by facilitating the provision of new, high-quality housing in the City.

The Proposal is consistent with City policy to integrate land use and transportation decisions. *See* Policy TR-1. The Proposal, if approved, would support Policy TR-1 by facilitating the potential redevelopment of an existing multifamily use that is situated on the urban street network, served by transit, and within walking distance of much of Downtown.

The Proposal is appropriate due to changed conditions in the City. The land use context of the Northwest Bellevue Subarea has changed dramatically due to the explosion of growth in Downtown Bellevue, the City’s Downtown rezoning in 2017, and the upcoming introduction of regional light rail to Downtown in 2023. Re-evaluating the land use designation and zoning classification of the Property is appropriate given the changed context.

Block 4a. Threshold Review Decision Criteria.

The proposed amendment is consistent with the Threshold Review Decision Criteria in LUC Section 20.30I.140 and appropriate for inclusion on the 2019 docket. Each criterion is discussed in turn below.

A. The proposed amendment presents a matter appropriately addressed through the Comprehensive Plan.

The Proposal satisfies Criterion A because it represents a change in land use policy for the Property. The Comprehensive Plan establishes the community’s desire for how the city should change and lays out a groundwork of planning policies to guide city actions. Introduction & Vision Element at 2.

B. The proposed amendment is in compliance with the three-year limitation rules set forth in LUC 20.30I.130.A.2.d.

The Proposal satisfies Criterion B because no Comprehensive Plan amendment has been proposed for the Property within the previous three years.

C. The proposed amendment does not raise policy or land use issues that are more appropriately addressed by an ongoing work program approved by the City Council.

The Proposal satisfies Criterion C because no ongoing Comprehensive Plan Amendment work program applies to the Property. Though the NW Subarea Plan is currently going through an update process, the Proposal requires an amendment to the broader Comprehensive Plan. If approved, the Proposal would be appropriate for inclusion in the updated NW Subarea Plan. In

addition, the current NW Subarea Plan update does not intend to address land use densities or designations.

D. The proposed amendment can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program.

The Proposal satisfies Criterion D because it represents a relatively uncomplicated request to adjust land use policy that can be reasonably reviewed without requiring resources or time that would be extraordinary for the Annual Comprehensive Plan Amendment Work Program.

E. The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended.

The Proposal satisfies Criterion E because it addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended. The pertinent Comprehensive Plan map, which is the “North Bellevue Land Use Plan” map contained in the NW Subarea Plan, was prepared years ago. In the time since, the land use context of the Northwest Bellevue Subarea has changed dramatically due to the upcoming introduction of regional light rail to Downtown in 2023, explosion of growth in Downtown Bellevue, and the City’s Downtown rezoning in 2017. Additionally, the need to provide a diversity of housing options and new housing capacity has reached an urgent level due to unanticipated sharp rises in population and housing costs in the City and King County.

F. When expansion of the geographic scope of an amendment proposal is being considered, shared characteristics with nearby, similarly situated property have been identified and the expansion is the minimum necessary to include properties with those shared characteristics.

The Proposal satisfies Criterion F because characteristics shared among similarly situated properties have been identified and the Proposal represents the minimum necessary to redesignate the Property. A multifamily community located adjacent to the south of the Property is similarly situated due to its physical proximity to the Property and to Downtown, its similar current density, and the similar age of its buildings. The owner of the property to the south supports the Proposal and is open to being included in the Proposal if the City deems it appropriate.

G. The proposed amendment is consistent with current general policies in the Comprehensive Plan for site-specific amendment proposals. The proposed amendment must also be consistent with policy implementation in the Countywide Planning Policies, the Growth Management Act, other state or federal law, and the Washington Administrative Code.

The Proposal satisfies Criterion G because the Proposal is consistent with current general policies in the Comprehensive Plan for site-specific amendment proposals, as described in “Block 3” above. The Proposal is also consistent with policy implementation in the Countywide Planning Policies, the Growth Management Act (RCW 36.70A), other state or federal law, and the Washington Administrative Code.

The Proposal is consistent with the Growth Management Act because it “encourage[s] development in urban areas where adequate facilities and services exist or can be provided in an efficient manner”

(RCW 36.70A.020(1) and “promote[s] a variety of residential densities and housing types” (RCW 36.70A.020(4).

The Proposal is consistent with King County Countywide Planning Policies. For example, DP-3 encourages the efficient development and use of residential land through “encouraging compact development with a mix of compatible residential, commercial, and community activities” and “maximizing the use of the existing capacity for housing and employment.” The Proposal, if approved, would encourage compact development near a mix of activities and maximize the use of existing capacity.

H. *State law requires, or a decision of a court or administrative agency has directed such a change.*

Criterion H does not apply to the Proposal.

Block 4b. Rezone Decision Criteria.

Please see the Applicant’s concurrent Reasoning Application, which contains the analysis of the rezone decision criteria.



DEVELOPMENT SERVICES DEPARTMENT
450 110TH AVENUE NE
BELLEVUE, WA 98009-9012

Received
JAN 31 2019
Permit Processing

SEPA Environmental Checklist

If you need assistance in completing the checklist or have any questions regarding the environmental review process, please visit the Land Use Desk in the Permit Center between 8 a.m. and 4 p.m., Monday through Friday (Wednesday, 10 to 4) or call or email the Land Use Division at 425-452-4188 or landusereview@bellevuewa.gov. Assistance for the hearing impaired: Dial 711 (Telecommunications Relay Service).

Purpose of 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 for applicants:

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

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.

PLEASE REMEMBER TO SIGN THE CHECKLIST. Electronic signatures are also acceptable.

A. Background [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#)
"The Park in Bellevue", 1515 Bellevue Way NE, Bellevue, WA (the "Property")
2. Name of applicant: [\[help\]](#)
1515 Bellevue Way, LP (the owner of the Property)
3. Address and phone number of applicant and contact person: [\[help\]](#)
*Ed Segat
1515 Bellevue Way LP
600 108th Ave. NE, #1010
Bellevue, WA 98004
(425) 233-6184*
4. Date checklist prepared: [\[help\]](#)
January 30, 2019
5. Agency requesting checklist: [\[help\]](#)
City of Bellevue Dept. of Development Services
6. Proposed timing or schedule (including phasing, if applicable): [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. However, future redevelopment scenarios are anticipated to be multi-family residential.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [\[help\]](#)
N/A
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
10. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate

project-specific SEPA analysis for future redevelopment is anticipated.

11. Give 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.)

[\[help\]](#)

The Applicant proposes amending the Comprehensive Plan land use map to redesignate the Property from MF-M to the proposed Multifamily-Urban Residential (MF-UR) designation to support density of more than 30 dwelling units per acre and a maximum building height of 75 feet. The Property is approximately 9.4 acres. If the redesignation request is approved, the Applicant anticipates redeveloping the Property with new multi-family housing.

12. 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 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. [\[help\]](#)

The Property is located at 1515 Bellevue Way NE (Parcel No. 2925059100).

B. Environmental Elements [\[help\]](#)

1. Earth [\[help\]](#)

- a. General description of the site: [\[help\]](#) (select one): Flat, rolling, hilly, steep slopes, mountainous, other: *Click here to enter text.*

- b. What is the steepest slope on the site (approximate percent slope)? [\[help\]](#)

Click here to enter text.

- c. 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. [\[help\]](#)

Norma Sandy Loam, Alderwood Gravelly Sandy Loam, Arents Alderwood Material

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#)

We are not aware of a history of unstable soils in the immediate vicinity.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of

any filling, excavation, and grading proposed. Indicate source of fill. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

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

[\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

2. Air [\[help\]](#)

- a. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

3. Water [\[help\]](#)

a. Surface Water :

- 1) 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. [\[help\]](#)
There is no surface water body on the Property or in its immediate vicinity.
- 2) 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. [\[help\]](#)
N/A
- 3) 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 fill material. [\[help\]](#)
N/A
- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [\[help\]](#)
N/A
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [\[help\]](#)
No.
- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

b. Ground Water:

- 1) 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. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
- 2) 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. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

c. Water runoff (including stormwater):

- 1) 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- 2) Could waste materials enter ground or surface waters? If so, generally describe. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

4. Plants [\[help\]](#)

- a. Check the types of vegetation found on the site: [\[help\]](#)

deciduous tree: alder, maple, aspen, other: *Click here to enter text.*

evergreen tree: fir, cedar, pine, other: *Click here to enter text.*

shrubs

grass

pasture

crop or grain

Orchards, vineyards or other permanent crops.

wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other: *Click here to*

enter text.

water plants: water lily, eelgrass, milfoil, other: [Click here to enter text.](#)

Other types of vegetation: [Click here to enter text.](#)

- b. What kind and amount of vegetation will be removed or altered? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- c. List threatened and endangered species known to be on or near the site. [\[help\]](#)

We are not aware of threatened or endangered species known to be on or near the Property.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- e. List all noxious weeds and invasive species known to be on or near the site. [\[help\]](#)

Click here to enter text.

5. Animals [\[help\]](#)

- a. 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. [\[help\]](#)

Examples include:

birds: hawk, heron, eagle, songbirds, other: [Click here to enter text.](#)

mammals: deer, bear, elk, beaver, other: [Click here to enter text.](#)

fish: bass, salmon, trout, herring, shellfish, other: [Click here to enter text.](#)

- b. List any threatened and endangered species known to be on or near the site. [\[help\]](#)

We are not aware of any threatened or endangered species known to be on or near the Property.

- c. Is the site part of a migration route? If so, explain. [\[help\]](#)

Click here to enter text.

- d. Proposed measures to preserve or enhance wildlife, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

- e. List any invasive animal species known to be on or near the site. [\[help\]](#)

Click here to enter text.

6. Energy and Natural Resources [\[help\]](#)

- a. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- c. 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: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

7. Environmental Health [\[help\]](#)

- a. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- 1) Describe any known or possible contamination at the site from present or past uses. [\[help\]](#)

We are not aware of any contamination on the Property.

- 2) 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. [\[help\]](#)

We are not aware of any hazardous chemicals/conditions that might affect future project development and design.

- 3) 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

4) Describe special emergency services that might be required. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

5) Proposed measures to reduce or control environmental health hazards, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

b. Noise [\[help\]](#)

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

2) 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)? Indi-cate what hours noise would come from the site. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

3) Proposed measures to reduce or control noise impacts, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

8. Land and Shoreline Use [\[help\]](#)

a. 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. [\[help\]](#)

The Property is currently developed with multifamily use. Adjacent properties are developed with multifamily, single family, and commercial uses. The proposal would allow for increased density and building height on the Property but would maintain the Property's existing multifamily use. It is not anticipated that the proposal would negatively affect current land uses on nearby properties.

- b. 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 nonfarm or nonforest use? [\[help\]](#)

No.

- 1) 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: [\[help\]](#)

N/A.

- c. Describe any structures on the site. [\[help\]](#)

The Property is developed with "The Park in Bellevue," which is comprised of 24 apartment structures.

- d. Will any structures be demolished? If so, what? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Future redevelopment scenarios might include the demolition of the existing buildings.

- e. What is the current zoning classification of the site? [\[help\]](#)

The Property is zoned R-20.

- f. What is the current comprehensive plan designation of the site? [\[help\]](#)

The land use designation of the Property is Multifamily - Medium Density (MF-M). This Comprehensive Plan amendment request would establish a "Multifamily - Urban Residential" (MF-UR) designation allowing for more than 30 dwelling units per acre, and redesignate the Property to MF-UR.

- g. If applicable, what is the current shoreline master program designation of the site? [\[help\]](#)

N/A.

- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [\[help\]](#)

No.

- i. Approximately how many people would reside or work in the completed project? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

j. Approximately how many people would the completed project displace? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated

k. Proposed measures to avoid or reduce displacement impacts, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: [\[help\]](#)
N/A.

9. Housing [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future development is anticipated.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future development is anticipated.

c. Proposed measures to reduce or control housing impacts, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is

anticipated. Any future development would comply with all applicable federal, state, and local regulations

10. Aesthetics [\[help\]](#)

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. It is proposed that maximum building height would be 75 feet.
- b. What views in the immediate vicinity would be altered or obstructed? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
- c. Proposed measures to reduce or control aesthetic impacts, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

11. Light and Glare [\[help\]](#)

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
- b. Could light or glare from the finished project be a safety hazard or interfere with views? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
- c. What existing off-site sources of light or glare may affect your proposal? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- d. Proposed measures to reduce or control light and glare impacts, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

12. Recreation [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity? [\[help\]](#)
McCormick Park and Zumdieck Park are designated recreational opportunities in the vicinity of the Property.
- b. Would the proposed project displace any existing recreational uses? If so, describe. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

13. Historic and cultural preservation [\[help\]](#)

- a. 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. [\[help\]](#)
The Property does not contain buildings, structures, or sites that are over 45 years old. We are not aware of any nearby structures that are eligible for historic preservation.
- b. 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. [\[help\]](#)
We are unaware of any evidence of Indian or historic use or occupation on the Property.
- c. 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. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is

anticipated. Any future development would comply with all applicable federal, state, and local regulations.

- d. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

14. Transportation [\[help\]](#)

- a. 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. [\[help\]](#)
The Property is served directly by Bellevue Way NE and NE 12th Street.

- b. 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? [\[help\]](#)
Yes. The Property is served by King County Metro bus route 249 on Bellevue Way NE. The Property is approximately 0.8 miles from additional transit service at the Bellevue Transit Center.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- d. 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). [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [\[help\]](#)
N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- f. 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 nonpassenger vehicles). What data or transportation models were used to make these estimates? [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- g. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- h. Proposed measures to reduce or control transportation impacts, if any: [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

15. Public Services [\[help\]](#)

- a. 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. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

- b. Proposed measures to reduce or control direct impacts on public services, if any. [\[help\]](#)

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development would comply with all applicable federal, state, and local regulations.

16. Utilities [\[help\]](#)

- a. Circle utilities currently available at the site: [\[help\]](#)
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other

All necessary utilities are available at the Property.

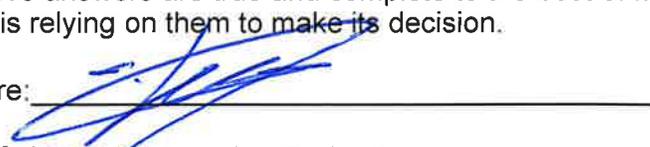
- c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [\[help\]](#)

Click here to enter text.

C. Signature [\[help\]](#)

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: _____



Name of signee: *Claudio Guincher*

Position and Agency/Organization: *Manager/ 1515 Bellevue Way LP*

Date Submitted: *January 31, 2019*

SUPPLEMENTAL SHEET FOR NONPROJECT ACTION
Continuation of the Environmental Checklist

4/18/02

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment (see Environmental Checklist, B. Environmental Elements). When answering these questions, be aware of the extent 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. If you have any questions, please visit or call Development Services (425-452-6800) between 8 a.m. and 4 p.m., Monday through Friday (Wednesday, 10 to 4). Assistance for the hearing impaired: Dial 711 (Telecommunications Relay Service).

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?

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

Proposed measures to avoid or reduce such increases are:

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.

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

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

N/A. The proposal is a non-project action for a Comp Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.

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

N/A. The proposal is a non-project action for a Comp Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

Proposed measures to protect or conserve energy or natural resources are:

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local 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?

N/A. The proposal is a non-project action for a Comp Plan amendment and LUC amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. The Property is not located in an environmentally sensitive area or area designated for governmental protection.

Proposed measures to protect such resources or to avoid or reduce impacts are:

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.

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?

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. The Property is not located in the Shoreline Overlay District.

Proposed measures to avoid or reduce shoreline and land use impacts are:

N/A. The proposal is a non-project action for a Comp Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.

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

N/A. The proposal is a non-project action for a Comp Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated.

Proposed measures to reduce or respond to such demand(s) are:

N/A. The proposal is a non-project action for a Comp Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.

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

N/A. The proposal is a non-project action for a Comprehensive Plan amendment and Land Use Code text amendment. Separate project-specific SEPA analysis for future redevelopment is anticipated. Any future development will comply with all applicable federal, state, and local regulations.