

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

Crossroads Subarea/Bellevue Technology Center

Staff Recommendation: *Do not include* the Crossroads Subarea/Bellevue Technology Center Comprehensive Plan Amendment in the 2019 annual work program.

Application Number: 19-104146 AC

Subarea: Crossroads

Original Addresses: 15805 NE 24th Street, 2010 and 2344 156th Avenue NE, and 15800, 15850, and 15860 Northup Way NE

Applicant: KBS SOR 156 Ave NE LLC

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.

Bellevue Technology Center CPA 19-104146 AC

This privately-initiated application proposes one site-specific amendment on approximately 4.7 acres (880300-0040) of the nearly 47-acre Bellevue Technology Center site from Office (O) to Multifamily-Medium (MF-M); and proposes seven new site-specific directed amendments to the Crossroads Subarea Plan that would apply to redevelopment of the entire BTC site. See Attachment 1.



These seven proposed policies purport to enable transit-oriented development densities, add a multi-part affordable housing component, identify urban design considerations for neighborhood edges and conservation easements, encourage multi-modal mobility options, and seek to strengthen economic vitality in the BTC area through implementing transit-oriented development. Then these changes would amend Crossroads Subarea Plan Figure S-CR.1 accordingly.

This privately-initiated application also proposes three non-site-specific policy amendments to the Comprehensive Plan which would direct city actions to encourage innovative transportation

demand management techniques for new transit-oriented development in the city; add improvements to the Transportation Facility Plan (TFP) for transit-oriented development that support and implement the city's adopted Multimodal Level-of-Service (MMLOS) metrics and targets (as applicable); and encourage neighborhood stability by providing transportation mitigation measures when improving the regional [transportation] system. See Attachment 2.

The application gives five goals explaining the need for its proposal:

1. Ensuring GMA Compliance
2. Support Affordable Housing by volunteering ten percent of any units to be affordable
3. Supporting Economic Development priorities
4. Transit-Oriented Development and Supporting Transit Ridership around current and future transit systems
5. Permanent Conservation of the Park-like Character through conservation easements

The application makes repeated reference to the site’s location in the Northeast Bellevue Subarea—and the effect of this circumstance on its redevelopment policy proposals citing this—as a reason for meeting Threshold Review criteria. The site location is actually in the Crossroads Subarea.

OVERVIEW OF STAFF RECOMMENDATION

Staff recommends not including this CPA application 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 (LUC20.30I.140). In particular, that the following decision criteria are not met:

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

The proposal, now revised for the third time in five years, remains a solution in search of a problem.

BACKGROUND

The site, Bellevue Technology Center, formerly and for years known as Unigard, has a long development history through the implementation of a planned unit development (PUD). Key PUD components have been protection of the open space “meadow” and large stands of trees in the northeast and south parts of the site, as well as views of and through the site, and the mitigation of traffic impacts. Once Comprehensive Plan policy established the characteristics of open space preservation, scenic tree cover and neighborhood compatibility, owners developed office buildings through a series of development actions implemented over time starting in 1973, with the last buildings built in 2000.

While allowing development capacity to be concentrated (thus preserving meadow and tree areas) the PUD set a limit on total square footage and lot coverage limits. The site has approximately 306,000 net square feet of office and 240,000 square feet of parking and service square footage in nine building on nearly 47 acres.

Great Neighborhoods

The City Council initiated the Northeast and Northwest Bellevue Subarea Plan Comprehensive Plan Amendments on August 6, 2018, as the first two in the neighborhood planning process to amend subarea plans.

With respect to comprehensive plan policy and regulatory considerations for such issues as density, the council acknowledged the citywide growth strategy as established in the Comprehensive Plan is part of a framework and guide that should not vary between neighborhood areas. Once Great Neighborhoods has produced a new strategic priority framework, then within this framework, potential plan or regulatory changes may be

appropriate. Although this acknowledgement didn't expressly preclude privately-initiated plan amendment applications before subarea plan adoption, it is clear to see how such applications contravene the expressed intent of the neighborhood planning process.

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 CPA 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 proposed amendment does not present such a matter.

Comprehensive Plan not the venue

A series of years-long and varied attempts to amend the PUD controlling development on the BTC/Unigard site (culminating in a 2015 rezone attempt) have been unable to establish grounds for changing Comprehensive Plan policy. Such consistent rejection indicates that the Comprehensive Plan is not a venue for the applicant's issue. The three plan amendment applications, two of which have been withdrawn, simply reinforce this.

Measuring environmental impacts of actions taken by the city

Additionally, the three non-site-specific policy amendments proposed in this 2019 plan amendment application direct city actions that are not part of the Plan or of its functional implementation plans. The fiscal and environmental impacts of such direct city actions cannot be measured through the environmental assessment associated with annual Comp Plan amendment actions.

Consequence of defining GMA consistency as "identical"

There is an unintended consequence in insisting as grounds for amendment that subarea plans contain identical elements to those in the general plan, rather than the actual GMA requirement that subarea plans be consistent with the general plan. It would be impossible to adopt neighborhood plans one at a time and then analyze as if for the entire system; there would be sixteen comprehensive plans that might or might not speak to each other on cross-neighborhood impacts.

Bellevue continually plans for growth. We accommodate our housing and job targets where they should be accommodated—and identify where they should not be accommodated.

- 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 because the City Council has yet to see a Threshold Review recommendation for the BTC site since the applicant withdrew both the 2014 and 2017 proposed plan amendment applications after Threshold Review recommendations by the Planning Commission declined to advance the proposed amendments.

- 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*

Staff concludes this amendment raises policy or land use issues inappropriate to the annual amendment process or any other ongoing work program.

Annual amendment process

The BTC site is the scene of a fifty-three-year tug of war between its various owners and surrounding residential and business communities. This, the third of three proposed plan amendments in five years, suggests the annual amendment process is inadequate to resolve this tug of war (this staff recommendation already suggested that the Plan is not appropriate to address density on this site.)

Great Neighborhoods subarea planning process

The applicant erroneously suggests the site's appropriateness for amendment is due to its presence in the Northeast Bellevue Neighborhood, leaving it lacking when it comes to consistency with the Growth Management Act's policy and land use direction. Although the GMA clearly provides deference to local jurisdictions when it comes to local planning policy and land use issues, the process for transitioning from its current Crossroads Subarea location to Northeast Bellevue—the Great Neighborhoods subarea planning process—is still underway. As previously mentioned this process by design excludes addressing any issues related to density and land use change.

BelRed Look Back

If BelRed densities outside of BelRed were to be considered, the BelRed Look Back might be appropriate although the City Council has not yet made that an ongoing work program.

Ten-year major Plan update

In the absence of a BelRed Look Back program, we would normally be left with only the 10-year major plan update whose next cycle, appropriate for larger than single-site issues, starts up in 2021.

Deciding where boundary 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.

- 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.

Traffic modeling of proposed growth capacity

The proposal is at the Bellevue Technology Center, a nearly 47-acre, Office-zoned site with a zoning stipulation (through a PUD) that constrains the amount of developed square footage on the site in balance with area open space and significant tree stands. In the absence of the PUD constraints, the city has estimated the size of the site suggests additional development could be realized in a build-out range of 315,000 to 600,000 square feet (on top of the existing approximately 300,000 square feet of office). These square foot figures are new for a growth scenario under the city's traffic forecast modeling assumptions, and the proposed amendment would be subject to the heightened scrutiny of a Bellevue- Kirkland-Redmond (BKR) model run in Final Review—a resource and timeframe not usually associated with proposed plan amendments.

Lack of infrastructure planning

The proposal also includes seven new site-specific directed amendments to the Crossroads Subarea Plan that would apply to redevelopment of the site to achieve transit-oriented development densities. Then it proposes policies directing city actions to mitigate the effect of this transit-oriented development, in a mobility management area where the city has never intended the infrastructure necessary to support such development intensity.

Additional regulating and monitoring tools needed

Clearly the above-stated application suggests new policies that create a development problem, which the applicant then offers to mitigate. The applicant's proposed policies would require applying other regulating and monitoring tools, including traffic impact fees, the Transportation Facilities Plan, and additional BKR modeling (to assess and encourage neighborhood stability by providing transportation mitigation measures when improving the regional [transportation] system).

TOD analyzed only through areawide studies w/ CAC

The city has consistently examined the application of transit-oriented development areas only through specific work programs and with full citizen advisory involvement. Examples include the Eastgate Land Use and Transportation Study, the East Main CAC, the Wilburton/Grand Connection project, and the Downtown Livability Study. To look at such applications outside of this well-established process would sidestep an accurate assessment of resources and circumvent full citizen advisory involvement.

- 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);*

No change in growth strategy

The application does not demonstrate significantly changed conditions on the site or its surrounding area. The citywide Comprehensive Plan update was adopted by the City Council in 2015. It lays out the city's overall growth strategy (and continues, in the case of Crossroads) specifically in the Land Use, Economic Development, and Neighborhood Elements. Acknowledging planning for growth impacts from urban centers expansion in Redmond, placing more growth on this site is not part of that overarching strategy, of managing growth and development while working to protect and enhance neighborhoods. While the specific text of the Crossroads Subarea Plan was not included in the updates to the general elements of the Plan, there has been no significant change since the 2015 Plan adoption with regard to the City's overall growth strategy.

Passage of time

In this circumstance, the passage of time is also not a significantly changed condition. The Crossroads Subarea Plan remains effective, in part because its policies apply to a site that was sensitive to its owner and surrounding community in 1972, and its continued impact on the community is sensitive today. The sensitivity of this site for the adjacent neighborhood and PUD conditions on the office use continue to be appropriate, despite the passage of time. As an example, the PUD has consistently preserved Conservation of the Park-like Character in the meadow and tree stand areas for going on 50 years. It is hard to see how that is not a permanent solution.

Plan anticipation

All of the issues raised by the application regarding significantly changed conditions: Compliance with GMA; missing middle housing commitment; Housing Emergence of IT and Business Services Cluster; establishment of [the] B line; light rail connections to Downtown Redmond; Bellevue's evolving TOD Policies; and proximity to urban centers all emphasize that this application lacks the key essentials

necessary to demonstrate this criterion—i.e. that the Plan did not anticipate them:

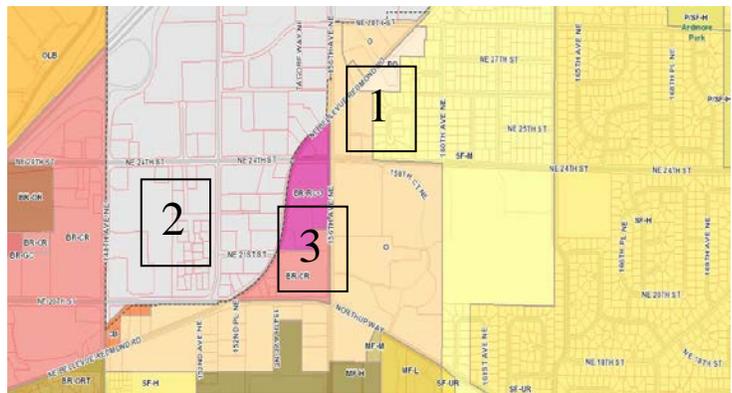
- A comprehensive plan is presumed compliant under GMA after Department of Commerce and PSRC validation actions
- The city’s Affordable Housing Strategy affirms Bellevue’s commitment to appropriately-located housing opportunities
- The provision of high capacity transit continues to anticipate transit center development. Bellevue’s transit-oriented development focus is accomplished through specific work programs with extensive community engagement
- Proximity to an urban center is not just adjacency

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 bounded on three sides by public streets, and on the fourth (eastern) side by Interlake High School and by the backyards of 7 single family homes in the Park Place and Bellewood East neighborhoods.

The site (1) is in the center of an arc of Office-designated property in Crossroads that curves around Redmond/ Group Health (2) and the easternmost “foot” (3) of the BelRed neighborhood. Although these Office properties share zoning and major street boundaries characteristics,

the other properties lack the shared characteristic of the BTC site’s size. The proposed plan amendment could not be expanded to these other sites and still provide a potential increased density benefit.



Office-designated areas in north Crossroads

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 is inconsistent with current general policies and with CPP policy implementation. The proposal for transit-oriented development on this site is not aligned with the Comprehensive Plan’s identified target areas for major mixed use/commercial growth. These target areas are shown on Map LU-4, which explains that “certain mixed-use areas are anticipated to accommodate a significant proportion of the city’s projected growth.”

Plan growth geography and the bright line

While the eastern edge of BelRed includes a portion of a high-density node along 156 Avenue NE across from the subject site, a clear dividing line is established along this arterial. Bellevue Technology Center lies on the east side of this dividing line and is outside this or any other area envisioned by the Comprehensive Plan to accommodate denser urban development. The subject site, along with other office and commercially-designated property on the east side of the 156th Avenue NE and Bel-Red Road NE provide for commercial development at an appropriate transitional scale with residential neighborhoods to the east and south.

ED-1 versus LU-4: not the same thing

By virtue of its Office zoning, the site is located in the City's SR-520/BelRed major employment center (Map ED-1.) The application suggests Economic Development issues for supporting it outside of the City's mixed-use center designations (**Map LU-4**) include proximity to the BelRed technology cluster; that the size of the site outside of a mixed-use center represents a catalyst opportunity, and that the Northeast Bellevue Subarea Plan lacks any policies addressing economic development. The city implements such issues through its successful economic vitality efforts, concentrated where the Comprehensive Plan directs such issues. The Major Employment Centers in Figure ED-1 are where office zoning in the city occurs, representing commercial job growth opportunities. Figure LU-4 showing the city's Mixed-Use Centers is where we will concentrate mixed uses. These are not the same things.

GMA consistency

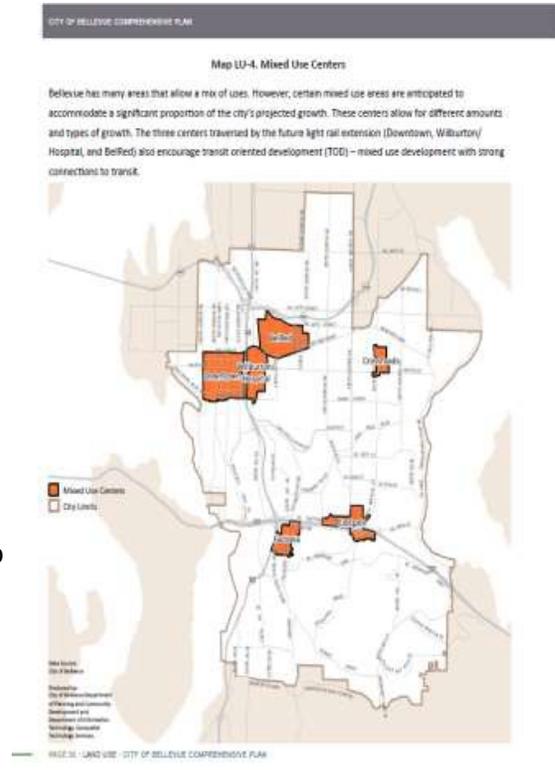
The application states that due to the city's planning efforts, it is a significant consequence that the North Bellevue Subarea plan lacks GMA-required policies and mandatory elements. The record indicates otherwise. Notwithstanding that the location of the application site in the Crossroads Subarea, and is not the Northeast Bellevue Subarea, GMA consistency between subarea plans and general comp plans is an issue of settled law in Washington state. Subarea plans—optional elements under GMA—are required to be consistent with the general plan, not identical to it.

WAC 365-196-210(7) defines consistency as: *[T]hat no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system.*

A growth management hearings board will find a comprehensive plan or amendment valid unless the board determines that a city's action is clearly erroneous in view of the entire record and in light of the goals and requirements of the GMA. RCW 36.70A.320(3). When reviewing a city's comprehensive plan, a hearings board must recognize cities' broad legislative discretion in planning, and grant deference to cities in how they plan growth. RCW 36.70A.3201.

Microsoft

The BTC application goes on to note that a significantly changed condition exists in the city's new commitment and opportunities to leverage



The case cited in this BTC application—twice—suggesting that the city's subarea plans and general plan are inconsistent is a 2006 Growth Management Hearings Board decision, brought against Walla Walla County, arguing that the county had improperly amended its UGA. In addressing whether the county's newly-adopted regulations violated GMA provisions at RCW 36.70A.030 and .040 for failure to contain standards or controls, the Board acknowledged only—by citing a 1996 case (West Seattle Defense Fund, Neighborhood Right Campaign, and Charles Chong v. City of Seattle) decided by the Central Puget Sound Growth Management Hearings Board—that it had jurisdiction over issues of subarea plan compliance with comprehensive plans.

public-private partnerships to fulfill a vision as a result of the Microsoft funding announcement. The vision is described as a commitment and opportunities to update zoning and land use around transit—with particular emphasis on missing-middle affordable housing.

Affordable Housing Strategy implementation

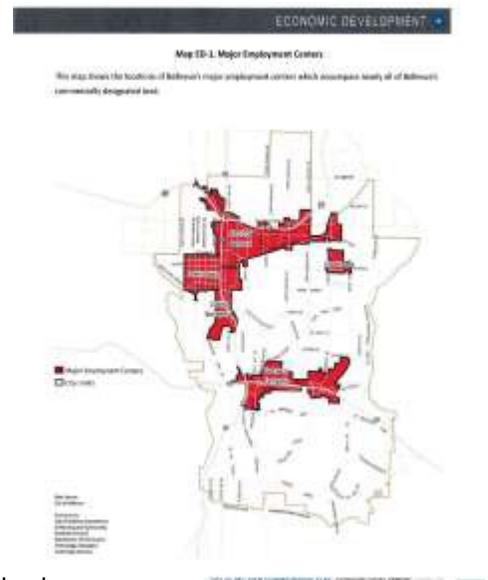
What the city is doing with affordable housing, through its Affordable Housing Strategy, and where it is doing it, are known conditions. The presence of this affordable housing “what” and “where” in Plan implementation make the contemplation of affordable housing as part of BTC’s transit-oriented development densities an opportunity, not a surprise. The existing Office zoning already allows for residential, there is approximately 17,000 square feet of development left under the PUD cap (which would make each of the approximately nine affordable units contemplated under the MF-M area designation on average to be nearly 1,900 square-foot units), and the residential location is well outside the one-half mile walkshed stipulated by the application for walkable transit center access, even if the crow didn’t fly it.

TOD location changes

Finally, the application states that housing emerging technology and business-services clusters, the presence of the “B” Rapid Ride, proximity to light rail connections to Downtown Redmond’s Urban Center, and the city’s evolving transit-oriented development policies together form a bundle of significantly changed conditions in deference to a goal of Transit-Oriented Development and Supporting Transit Ridership. Specifically, that the “B” Rapid Ride and one-half mile walkshed are significantly changed conditions since 2009’s BelRed adoption. Again, staff must note that this proposal is not in the Northeast Bellevue nor in the BelRed Subarea plans.

The proposed plan amendment is inconsistent with the following Plan policies:

- **LU-13** Support neighborhood efforts to maintain and enhance their character and appearance.
- **LU-14** Protect residential areas from the impacts of non-residential uses of a scale not appropriate to the neighborhood.
- **LU-25** Assess the compatibility of commercial uses and other more intense uses when located in mixed use and predominantly residential areas.
- **LU-29** Help communities to maintain their local, distinctive neighborhood character, while recognizing that some neighborhoods may evolve.
- **N-1** Maintain neighborhoods as safe and welcoming environments for everyone to enjoy.
- **N-15** Ensure Neighborhood area plans and policies are consistent with the other policies of the Comprehensive Plan.
- **CE-2** Consider the interests of the entire community and the goals and policies of this Plan before making land use decisions. Proponents of change in land use should demonstrate that the proposed change responds to the interests and changing needs of the entire city, balanced with the interests of the neighborhoods most directly impacted by the project.



- **CE-3** Ensure that the process which identifies new commercial areas or expands existing areas considers the impacts of potential development on affected residential neighborhoods and results in decisions that are consistent with other policies in the Comprehensive Plan.

The proposed plan amendment is inconsistent with Countywide Planning Policy for:

- **DP-4:** Concentrate housing and employment growth within the designated Urban Growth Area. Focus housing growth within countywide designated Urban Centers and locally designated local centers. Focus employment growth within countywide designated Urban and Manufacturing/Industrial Centers and within locally designated local centers.

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 and all requested parties of interest.

Eighty-nine public comments or inquiries from seventy-seven parties of record have been submitted on this application to date. An online petition has garnered over 1,000 names. A comment letter analyzing the application at length was signed by representatives of ten neighborhood associations. Due to the large volume of comments received all are available online, as is a link to the petition. See Attachment 3.

Eighty-eight of the comments express opposition to the proposal. The themes of these comments reflect a concern that the proposal risks the unique and sensitive relationship that this site holds for the community and specifically the meadow, trees and low-impact visual access protected by the PUD, and furthermore, that the PUD established an agreement between the communities, city and property owners that the Bellevue Comprehensive Plan and Crossroads Subarea plan continue to reflect today. The comments discount the proposal's focus on urban growth, density and infrastructure factors, expressing the idea that 156th Avenue NE is a boundary and that neighbors adjacent to Redmond's Overlake Urban Center and BelRed continue to deserve protection as policy specifies.

Specific and repeated mention was made of traffic; how growth in Bellevue and in the area has severely affected people's quality of life as well as their choices about travel and access.

Finally, the comments reflect a concern that the communities are weathering impacts of never-ending change—and being overwhelmed—that they perceive from development already approved and underway.

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. [Public Comments](#) (online)

DOCUMENT ROUTING FORM

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

Folder: 19 104146 AC

Target Date: 05/31/2019

Folder Name: Crossroads Subarea/Bellevue Technology Center

Site Address: 15801 NE 24th St BldgA

Folder Type: Comprehensive Plan Amendment

Sub Type: Private

Work Proposed: Site Specific

Description: Text amendment and map amendment to portion of property.

Quick Review?:

Project Contact: KBS SOR 156th Avenue Northeast LLC Jason Espirtu

Phone: (206) 737-4321

Subject: Application Intake Process

Materials Routed:

Routed On: 01/31/2019

| | |
|-----|-----------------|
| XXX | Land Use |
| XXX | Utilities |
| XXX | Transportation |
| XXX | Policy Planning |



Application for
COMPREHENSIVE PLAN AMENDMENT

| | | |
|---|-----------------------------|---|
| CPA YEAR <u>2019</u> APPLICATION DATE: | TECH INITIALS <u>rom</u> | AMANDA PROJECT FILE: <u>19-104146 Ae</u> |
|---|-----------------------------|---|

1. Project name Crossroads Subarea/Bellevue Technology Center Affordable Housing Amendments
2. Applicant name KBS SOR 156th Avenue Northeast, LLC Agent name Jason Espirtu
3. Applicant address 10900 NE 8th Street, Suite 225 Bellevue, WA 98004
4. Applicant telephone (206) 737-4321 fax () e-mail jespirtu@kbs.com
5. Agent telephone () same fax () e-mail same

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 880300-0010; -0020; -0030; -0050; and -0060
15801 NE 24th St. Bellevue, WA 98008
 Proposed amendment to change the map designation from existing to proposed and MF-M
 Site area (in acres or square feet) 46 acres
 Subarea name Northeast Bellevue
 Last date the Comprehensive Plan designation was considered / / 85
 Current land use district (zoning) Office
 Is this a concurrent rezone application? Yes No Proposed land use district designation
 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.

See attached.

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

Last date the Comprehensive Plan policy or text was considered / / 85
 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.

See attached.

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.

See attached.

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 Rezone Decision Criteria in Land Use Code Section 20.30A.140. Attach additional pages as needed.

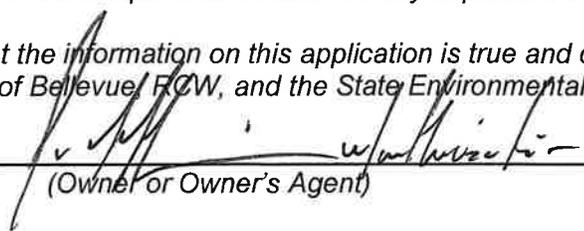
I have read the Comprehensive Plan and Procedures Guide

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

Signature of applicant  Date 1/30/19

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)

City of Bellevue Comprehensive Plan Amendment Application

Bellevue Technology Center Affordable Housing Proposal

January 31, 2019

Block 1. *Requests information for site-specific amendments.*

The Comprehensive Plan Amendment (“Proposal”) includes text amendments addressing to a 46-acre office designated property at 156th Avenue NE and NE 24th Street in the NE Bellevue Subarea (“Property”) and a map amendment of the Property’s southeast section to Multifamily Medium.

Block 2. *Proposed amendment language. This can either be 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. Attached additional pages as needed.*

The Proposed text amendment language is below:

| Comp Plan Element | Policy | Proposed Comp Plan Amendment Language |
|---------------------------|--------------------------|--|
| Northeast Bellevue | | |
| | New NE Policy (Land Use) | <u>Encourage multifamily residential development at the property east of 156th Avenue NE between Northup Way and south of NE 24th Street (known as Bellevue Technology Center) that provides for affordable and “missing middle” housing options.</u> <u>Any multifamily residential development at the Bellevue Technology Center shall include a minimum of 10 percent units affordable to families at or below 80 percent of area median income (AMI) for rental housing or at or below 120 percent of AMI for ownership housing. Encourage any residential project design to incorporate multi-modal mobility options, open space preservation and the park-like character of the property.</u> |
| | New NE Policy (Land Use) | <u>Encourage senior housing and multifamily residential housing with voluntary affordable housing components within Office and MF-M designated areas at the Bellevue Technology Center.</u> |
| | New NE Policy (Land Use) | <u>Integrate the strategy for promoting housing affordability at the Bellevue Technology Center site with the citywide approach.</u> |
| | New NE Policy (Land Use) | <u>Encourage innovative, infill transit-oriented development office, service and retail uses at Bellevue Technology Center.</u> <u>Encourage any nonresidential project design to incorporate multi-modal mobility options, open space preservation and the park-like character of the site.</u> |
| | New NE Policy (Land Use) | <u>Provide for graceful edges and transitions between the land uses at Bellevue Technology Center and surrounding neighborhoods.</u> |

| | | |
|--|--------------------------------|---|
| | New NE Policy (Parks) | <u>Encourage the use of conservation easements or other public-private partnerships for permanent passive open space at the Bellevue Technology Center, including the “meadow” area.</u> |
| | New NE Policy (Economics) | <u>Strengthen and encourage the economic vitality within the office area east of 156th Avenue NE between Northup Way and south of NE 24th Street through the implementation of infill, transit-oriented development projects and other land use techniques.</u> |
| | New NE Policy (Transportation) | <u>Encourage innovative transportation demand management strategies for new transit-oriented development projects, including enhanced commute trip reduction programs and privately-operated shuttles to encourage transit ridership.</u> |
| | New NE Policy (Transportation) | <u>Evaluate and propose additional improvements for consideration in the Transportation Facilities Plan update to support transit-oriented development opportunities at Bellevue Technology Center, including improvements that support and implement the City’s recently adopted Multimodal Level-of-Service (MMLOS) metrics and targets, as applicable.</u> |
| | New NE Policy (Transportation) | <u>Encourage neighborhood stability by providing transportation mitigation measures when improving the regional system. For new transit-oriented development projects, prioritize transportation mitigation measures that promote congestion-relief, support multimodal transportation investments, and provide an attractive streetscape and pedestrian environment.</u> |
| | Figure S-NE.1 | Amend to make consistent with adopted text policies. |

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. Include any data, research, or reasoning that supports the proposed amendment. Attach additional pages as needed.*

The Proposal has five goals: (1) support affordable housing by voluntarily committing to 10 percent of any units being affordable; (2) ensuring GMA compliance; (3) supporting economic development priorities; (4) encouraging residential and job density around current and future transit systems; and (5) permanently preserving the park-like character of the property through conservation easements.

GMA Compliance

In 2015, the City updated the Comprehensive Plan to shift the Bellevue Technology Center from the Crossroads Subarea to the Northeast Bellevue Subarea. The Northeast Bellevue Subarea Plan was adopted in 1985, which is prior to the adoption of the Growth Management Act (“GMA”). Before to the City’s 2015 update, the Northeast Bellevue Subarea did not have any office designated areas.

Now, with the map shift, Bellevue Technology Center is 46 acres of the approximately 72 acres of office-designated area within the Northeast Bellevue Subarea. The Northeast Bellevue Subarea Plan has *no* land use, housing, capital facilities, economic development, transportation or parks policies, among others, that addresses these office-designated areas that are now within this subarea. GMA requires that these policies be addressed. RCW 36.70A.070; *Citizens for Good Governance v. Walla Walla County*, GMHB Case No. 05-1-0013 at 61 (Bellevue not obligated to adopt subarea plans, but once it does, “the subarea plan is subject to the goals and requirements of the Act and must be consistent with the Comprehensive Plan.”). The Proposal provides policies to implement GMA.

Affordable Housing

Additionally, the City recently partnered with Microsoft and other Eastside cities to address affordable and “missing middle” housing. *Attachment A*. The Eastside continues to explore opportunities to address affordability to ensure that middle-income Eastside residents – our teachers, firefighters, first responders and other citizens – can continue to live close to work.

As part of this effort, the City committed to consider “updating zoning and land use regulations to increase density near current and planned transit.” The Bellevue Technology Center is located along key transit infrastructure. *Attachment B, p. 4*. Metro’s Rapid Ride “B” Line stops directly adjacent to the Bellevue Technology Center. The “B” Line runs between Redmond, Kirkland, Overlake Transit Center with Downtown Bellevue, connecting major employment centers.

The Bellevue Technology Center is also within ½ mile walkshed of the Overlake Village Light Rail station on 152nd Avenue NE opening in 2023. This is a prime area to implement the City’s commitment to affordable housing through updating the applicable land use policies and zoning.

KBS wants to support the City’s affordable housing goals. The Bellevue Technology Center is the largest remaining contiguous area in Northeast Bellevue. It presents a major opportunity to implement new affordable housing strategies. As part of Proposal, KBS will designate the southeast section of Bellevue Technology Center for housing and ***voluntarily commit to providing a minimum of 10 percent of housing to families at or below 80 percent of area median income for rental properties or at or below 120 percent of AMI for for-sale housing options.***

The Proposal is an opportunity for a public-private partnership to support the City’s affordable housing priorities, especially in supporting missing-middle housing supply in Northeast Bellevue.

Economic Development

The Bellevue Technology Center has become the international headquarters of one of Washington’s fastest growing private companies and the regional headquarters for numerous information technology companies that want to locate within proximity to Bel-Red technology cluster.

The Comprehensive Plan identified the Bellevue Technology Center as located within one of Bellevue’s five major employment centers. *Attachment B, p. 2-3* (Map ED-1). The Bellevue Technology Center is located at 156th Avenue NE and NE 24th Street at the edge of the Bel-Red subarea and south of Microsoft’s global headquarters. *Id.* The 46-acre Bellevue Technology Center is one of the City’s largest office designated areas that is located *outside* of a mixed-use center, which presents a significant, catalyst opportunity to support the City’s land use and economic development

goals, including the targeted support, recruitment and investment in the information technology cluster. The Northeast Bellevue Subarea Plan lacks any policies addressing economic development.

Transit-Oriented Development and Supporting Transit Ridership

The City signed the Puget Sound Regional Council’s Growing Transit Communities Compact (“Compact”) in 2014. The Compact provides for land use strategies for transit-oriented development around major transit infrastructure. The Compact calls for using land “efficiently” around transit stations and adopting innovative zoning to encourage transit-supportive densities. Bellevue Technology Center is currently developed and limited to a 0.16 floor area ratio (FAR), which is well below the permitted densities for other office-designated properties of 0.50 FAR.

The Proposed amendment would better align Bellevue Technology Center with the City’s vision, particularly in supporting the City’s target economic development clusters and promoting strategic opportunities for infill density to encourage transit-oriented development.

Conservation of the Park-like Character

We know that the Bellevue Technology Center meadow and wooded character is important to the community. It is important to us as well. Bellevue Technology Center is exploring partnership with Forterra, a leading regional conservation organization, to permanently conserve key portions of the Bellevue Technology Center campus, including the iconic meadow and stands of trees for the future.

The Proposal is warranted in order to achieve the City’s Comprehensive Plan vision, particularly:

| Comprehensive Plan | Policy Language (emphasis added) |
|--------------------|---|
| LU Policy-23 | <u>Provide a diversity of commercial areas outside the Downtown to provide an array of business and development opportunities</u> and to serve other parts of the community |
| LU Policy-25 | <u>Assess the compatibility of commercial uses and other more intense uses when located in mixed use and predominantly residential areas.</u> |
| LU Policy-27 | <u>Encourage the master planning of multi-building</u> and multi-parcel developments and large institutions <u>to emphasize aesthetics and community compatibility. Include circulation, landscaping, open space, storm drainage, utilities, and building location and design in the master plan.</u> |
| LU Policy-33 | <u>Preserve open space and key natural features through a variety of techniques,</u> such as sensitive site planning, <u>conservation easements,</u> transferring density, land use incentives and open space taxation. |
| HO Policy-21 | <u>Address the entire spectrum of housing needs, including the need for affordable housing to very low,</u> |

| | |
|--------------|---|
| | <u>low and moderate-income households, through the City's affordable housing programs.</u> |
| HO Policy-22 | <u>Encourage the development of affordable housing through incentives and other tools consistent with state enabling legislation.</u> |
| HO Policy-26 | <u>Provide incentives and work in partnership with not-for-profit and for-profit developers and agencies to build permanent low- and moderate-income housing.</u> |
| ED Policy-21 | <u>Support economic development in the city's commercial areas.</u> |
| ED Policy-23 | <u>Emphasize the value of a range of commercial centers to provide opportunities for a diverse range of businesses.</u> |
| ED Policy-26 | <u>Where a commercial revitalization effort involves significant changes to plans and regulations that may impact a residential neighborhood, develop strategies to avoid or minimize these impacts.</u> |
| ED Policy-31 | <u>Maintain and update integrated land use and transportation plans to guide the future of the city's major commercial areas and help them respond to change.</u> |
| ED Policy-35 | <u>Promote and nurture entrepreneurial development in Bellevue</u> by exploring ways to retain or create areas where small or <u>emerging businesses can develop and flourish.</u> |
| TR Policy-4 | <u>Incorporate transit-supportive and pedestrian-oriented design features in new development through development review.</u> |
| TR Policy-65 | <u>Support a frequent transit network in Bellevue</u> that serves transit hubs and population and <u>employment centers with reliable commuter and all-day service and seamless interface between transit routes, East Link, and other modes.</u> |
| TR Policy-84 | <u>Research and apply best practices of other cities and systems to guide city actions and advocacy in pursuit of the best community outcomes for developing and operating high capacity transit.</u> |
| UD Policy-2 | Preserve and enhance trees as a component of the skyline to retain the image of a "City in a Park." |
| UD Policy-27 | <u>Integrate high quality and inviting public and semi-public open spaces into major development.</u> |

Additionally, the Proposal is necessary to enhance consistency with the following policies:

| Comprehensive Plan | Policy Language |
|---------------------------|---|
| LU Policy-1 | Promote a clear strategy for focusing the city's growth |

| | |
|--------------|---|
| | <p>and development as follows:</p> <ol style="list-style-type: none"> 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 residential neighborhoods. 3. Continue to provide for commercial uses and development that serve community needs. |
| LU Policy-2 | Retain the city's park-like character through the preservation and enhancement of parks, open space, and tree canopy throughout the city. |
| LU Policy-3 | Promote a land use pattern and an integrated multimodal transportation system. |
| LU Policy-4 | Support a land use vision that is consistent with the GMA goals, the regional Vision 2040, and the King County Countywide Planning Policies. |
| LU Policy-5 | Accommodate adopted growth targets of 17,000 additional housing units and 53,000 additional jobs for the 2006-2031 period and plan for the additional growth anticipated by 2035. |
| LE Policy-9 | Work with regional partners to achieve a mix of jobs and housing that makes it possible for people to live closer to where they work. |
| LU Policy-32 | Acquire and maintain a system of parks, open space and other landscaped areas to perpetuate Bellevue's park-like setting and enhance the livability of the city's neighborhoods. |
| ED Policy-2 | Promote local businesses and locally-produced goods and services. |
| ED Policy-5 | Develop and maintain regulations that allow for continued economic growth while respecting the environment and quality of life of city neighborhoods |
| ED Policy-9 | Work with the business community and residential interests to promote community interests and to address differences in a manner that minimizes conflict. |
| ED Policy-15 | Encourage high quality design and urban amenities for public and private development, maintaining development standards to recognize that a quality built environment helps attract the talented workers who will sustain economic growth. |
| ED Policy-16 | Encourage development of a range of housing opportunities to accommodate Bellevue's growing workforce. |
| ED Policy-32 | Continue to identify, construct and maintain infrastructure systems and facilities required to promote and sustain a positive economic climate. Anticipate needs and |

| | |
|--------------|--|
| | coordinate city infrastructure investments with economic development opportunities. |
| ED Policy-36 | Maintain and regularly update the Economic Development Plan to ensure the city's focus areas and goals are forward-looking and targeted while being flexible enough to be able to respond to market changes. |
| ED Policy-37 | As part of on-going Economic Development strategic planning, consider the use of organizational and financial tools or investments, including public-private partnerships where appropriate, to catalyze or leverage private sector and other resources to accomplish the City's economic development and land use vision. |
| TR Policy-6 | Encourage private developers of adjacent or nearby properties to execute agreements to provide joint use and funding of shared parking facilities. |
| TR Policy-7 | Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that: <ol style="list-style-type: none"> 1. Transit may support more intense development around some stations; 2. Transit supportive design and orientation may be implemented without changes to land use intensity; and 3. Land use plan map changes would be precluded in existing single family designations and environmentally sensitive areas |
| TR Policy-13 | Promote use of mobility options by requiring new development to incorporate design features such as: <ol style="list-style-type: none"> 1. Preferential parking for carpools and vanpools; 2. Special loading and unloading facilities for carpools and vanpools; 3. Transit passenger facilities, including comfortable bus stops and waiting areas that may be integrated in the building design; and 4. Secure and covered bicycle parking, showers, lockers, and related facilities to support bicycle commuters |
| TR Policy-68 | Integrate pedestrian and bicycle access to transit as a means to serve neighborhoods. |
| TR Policy-69 | Ensure that transit services and facilities in Bellevue and the Eastside are high priorities for regional system plans and improvements consistent with the Bellevue Transit Master Plan. |
| TR Policy-70 | Secure transit system facilities and service to support planned land use. |

| | |
|--------------|--|
| TR Policy-71 | Advocate for transit service enhancements paired with city commitments to implement transit-supportive infrastructure. |
| TR Policy-72 | Work with transit providers to maintain and expand frequent and reliable transit service in Bellevue to support community needs, the city's land use plans and mode share targets. |
| TR Policy-73 | Implement infrastructure and technology to support reliable transit arrival and travel time along the frequent transit network. |
| TR Policy-74 | Ensure that the transit system includes commuter parking facilities that are located and managed to intercept trips close to the trip origins. |
| UD Policy-3 | Foster and value the preservation of open space as a dominant element of the city's character. |
| UD Policy-4 | Create a safe, engaging and attractive pedestrian environment throughout the city using appropriate urban design features. |

Block 4a. *Evaluating the proposed amendment. Explain how the proposed amendment is consistent with the Threshold Review Decision Criteria in LUC Section 20.301.140 (see Submittal Requirements Bulletin #53). Attach additional pages as needed. The Planning Commission may recommend inclusion of a proposed amendment to the Comprehensive plan in the Annual comprehensive Plan Amendment Work Program if the following criteria have been met:*

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

The Proposal are site-specific text and map amendments to the Northeast Bellevue Subarea Plan. The Proposal is most appropriately addressed through the Comprehensive Plan update.

B. The proposed amendment is in compliance with the three-year limitation rules set forth in LUC 20.301.A.2.d.; and

The Northeast Bellevue Subarea Plan was most recently amended in 1985. KBS has previously proposed Comprehensive Plan amendments for the Bellevue Technology Center but withdrew the proposals prior to a threshold determination. The Proposal complies with the three-year limitation.

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; and

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 City is currently undergoing a neighborhood planning effort for Northeast Bellevue Subarea. However, City staff has indicated that the neighborhood planning process is not the appropriate venue to address density or land use designations. As reflected in community comments, the Bellevue Technology Center is a key topic for the neighborhood planning effort. It seems logical that the future of the Bellevue Technology Center and the opportunities to support community priorities such as

transportation investments, open space protection and affordable housing would be part of the neighborhood planning process. Given staff direction, the Comp Plan amendment appears to be the staff's preferred route for such discussion. KBS welcomes the opportunity to merge the Proposal with the neighborhood planning effort to have a broader conversation about the site as appropriate.

D. The proposed amendment can be reasonably reviewed within the resources and time frame of the annual Comprehensive Plan work program; and

The Proposal presents a site-specific text and map amendment. The Proposal comports with the Growth Management Act mandate for annual review of the City's land use Plan. RCW. 36.70A.130.

E. The proposed amendment addresses significantly changed conditions since the last time the pertinent Comprehensive Plan map or text was amended. See LUC 20.50.046 for the definition of "significantly changed conditions"; and

Though growth itself does not constitute a changed circumstance, the intensity and rate of growth or development can be a changed circumstance. The following factors are all considered when looking at the changed circumstances: the rate, timing, and pace of development and the length of time since the Subarea Plan Element was last reviewed, as well as the effect of the proposal on housing targets and building land capacity, and the effect on existing planned infrastructure.

The Northeast Subarea Plan was last amended in 1985. Since then, a multitude of factors have resulted in significantly changed conditions that merit evaluation of the function of the Comprehensive Plan as a whole an integrated, policy-level guidance document.

Significantly changed conditions include:

- Compliance with Growth Management Act. The Northeast Bellevue Subarea Plan has *no* land use, housing, capital facilities, economic development, transportation or parks policies, among others, that addresses office-designated areas that are now within this subarea. GMA requires that these policies be addressed in the plan. RCW 36.70A.070; *Citizens for Good Governance v. Walla Walla County*, GMHB Case No. 05-1-0013 at 61 (Bellevue not obligated to adopt subarea plans, but once it does, "the subarea plan is subject to the goals and requirements of the Act and must be consistent with the Comprehensive Plan."). The 2015 major update indicated that City would address these issues through subarea planning updates, in turn. The Northeast Bellevue Subarea Plan update is underway, but staff is now indicating that the neighborhood planning process is not the appropriate venue for density and policy discussions about Bellevue Technology Center. The consequence is that the Northeast Bellevue Subarea Plan lacks GMA-required policies addressing office-designated areas within its boundaries. The Proposal is necessary to comply with GMA and ensure that the Comprehensive Plan and its adopted subarea plans function as an integrated whole.
- Missing-Middle Housing Commitment. Microsoft's investment of \$500M in affordable housing funds and loans across the Eastside is a transformational and welcome surprise.

One unintended, but positive, consequence is that it shifts the playing field on what is possible for public-private partnership to incentivize affordable housing. We applaud the

City's commitment to consider opportunities to update zoning and land use regulations around transit. Yet, this new commitment is not reflected in the Northeast Bellevue Plan.

KBS wants to help participate in the renewed investment in affordable and missing middle housing by voluntarily committing to providing 10 percent of all units on the property to families at or below 80 percent of AMI for rental housing or at or below 100 percent of AMI for for-sale housing options. The City's new commitment and opportunities to leverage public-private partnerships to fulfill that vision is a significantly changed condition.

- Housing Emergence of Information Technology and Business Services Cluster.

Since 1985, the employment patterns and densities around Bellevue Technology Center have transformed. Microsoft has emerged as the center of a global information technology cluster with more than 30,000 employees just north of the Bellevue Technology Center.

The City designated Bellevue Technology Center part of a Major Employment Center. *Attachment B, p. 3.* Over the last seven years, Bellevue Technology Center has become global headquarters to one of Washington's fastest growing private companies and numerous information technology businesses, including Hitachi and Intergen. The City's adopted Economic Development Plan calls for recruiting such technology firms. *See Economic Development Plan, Strategy 1.4.* Bellevue Technology Center is a success story in encouraging growth among the City's target economic clusters. The changing employment patterns, particularly in information technology is a significantly changed condition that warrants evaluation to ensure that the City's land use and economic development policies remain consistent, especially because the Northeast Bellevue Subarea Plan lacks any economic development policies.

- Establishment of Rapid Ride Bus Rapid Transit "B" Line on NE 24th Street Adjacent to the Property. The bus-rapid transit adjacent to Bellevue Technology Center requires review of the City's policies in relation to supporting transit-oriented development, land use and economic development priorities that have not be revisited for Bellevue Technology Center since GMA. The City has previously recognized that adjacency to bus rapid transit was a significantly changed condition (2013 Bellevue Apartments Proposal (Ordinance No. 6144)).
- Light Rail Connection to Downtown Redmond. In November 2016, Puget Sound voters approved Sound Transit 3 ("ST-3"), which will connect the existing Eastlink light rail to downtown Redmond by 2024. Once operational, accessing Downtown Redmond will be only three light rail stops away from Overlake Village and Bellevue Technology Center. Downtown Redmond is a regional growth center and is home to a number of major technology-based employers and a growing diversity of housing options that serve those employees. According to the City's Economic Development Plan, a significant portion of Bellevue's workers live in Redmond. The Plan also calls for leveraging the planned Eastlink light rail corridor, including "promoting community driven transit-oriented development opportunities around light rail stations and other major transit facilities." *See Strategy A.1.2.*

The Bellevue Technology Center is strategically located within the Overlake Village Station walkshed and provides opportunities to expand employment growth in identified target clusters through land use changes that leverage the proximity to employers and employees. With the passage of ST-3, the opportunities to leverage transit investment are even greater. Since ST-3 was adopted in 2016, this opportunity to support local and regional economic development priorities is a significantly changed condition not unanticipated in the Northeast Bellevue Subarea Plan, which was last amended in 1985.

- City's Evolving Transit-Oriented Development Policies. In 2009, the City adopted the Bel-Red Subarea Plan update, which including planning for the Overlake Village light rail station. But the City limited the station area planning efforts to a ¼ mile walkshed. This constrained visioning effort excluded the Bellevue Technology Center campus across 156th Avenue NE.

In 2014, the City signed onto the Puget Sound Regional Council's Growing Transit Communities Compact ("Compact"). The Compact strategies identify an emerging consensus that cities should be planning for transit-oriented development densities within ½ mile of light rail stations. The Bellevue Technology Center is within ½ mile of the Overlake Village station and within a walkable range for transit users. *Attachment B, p 4.* This emerging consensus is also consistent with Vision 2040, which sets "preferred targets" of 15-20 dwelling units per acre and 50 jobs per acre around high-capacity transit. Vision 2040, p. 81.

As evidenced by the adoption of the Compact, the City now recognizes the emerging planning consensus that its policies should be using land efficiently within ½ mile of stations, investing time and policy efforts to supporting employment and housing densities and supporting transit-oriented development in order to invest in economic vitality is a significantly changed condition since the City's 2009 Bel-Red efforts. The introduction of directly adjacent bus-rapid transit and light rail within a ½ mile walkshed is a significantly changed condition for the Property that must be evaluated at a policy-level.

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*

N/A.

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; or*

As a site-specific amendment, the Proposal is consistent with the Growth Management Act, particularly the Urban Growth, Reduce Sprawl, Economic Development, Open Space and Recreation, Property Rights, Environment and Public Participation planning goals.

The Proposal is also consistent with King County countywide Planning Policies, include the Environment (EN-1), Development Patterns (DP-2, DP-5, DP-6) and Economy (DC-17) policies.

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

N/A.

ATTACHMENT A

January 2019

We are some of the largest city mayors in King County representing communities outside Seattle and we believe that healthy, vibrant communities are ones that offer affordable housing options for families and individuals all along the income spectrum.

In recent years, the speed of economic and population growth in our region has outpaced the growth in housing supply, creating a shortage of affordable housing—pricing out too many households and threatening the fabric of our community.

We will continue our work to address homelessness and low-income housing and we will also work to address the growing crisis of the lack of affordability of middle-income housing in the area.

Too many of our teachers can no longer afford to live near the schools where they teach. Too many nurses, teachers, police and other first responders are moving out of the communities they serve to find homes they can reasonably afford. Homelessness continues to rise, and our local workforce is commuting from farther and farther away – worsening congestion and eroding our sense of community.

To address this problem, we intend to do our part to break down barriers and provide incentives to substantially increase the supply of quality housing for all households in our community.

We will consider opportunities to advance housing affordability in the region, including but not limited to:

- 1) Making available at no cost, at deep discount, or for long-term lease, under-utilized publicly-owned properties,
- 2) Updating zoning and land use regulations to increase density near current and planned public transit,
- 3) Reducing or waiving parking requirements in transit corridors to help reduce overall development costs,
- 4) Reducing or waiving impact and other development-related fees,
- 5) Streamlining and accelerating the permitting process for low- and middle-income housing projects to improve developer certainty,
- 6) Providing tax exemptions and credits to incent low- and middle-income housing development, and
- 7) Updating building codes to promote more housing growth and innovative, low-cost development.

We believe that these efforts, combined with the support of the greater community, will make our region more affordable for all households and will advance quality of life throughout the region.

Mayor Nancy Backus, City of Auburn
Mayor John Chelminiak, City of Bellevue
Mayor Jim Ferrell, City of Federal Way
Mayor Mary Lou Pauly, City of Issaquah
Mayor Dana Ralph, City of Kent

Mayor Penny Sweet, City of Kirkland
Mayor John Marchione, City of Redmond
Mayor Denis Law, City of Renton
Mayor Christie Malchow, City of Sammamish

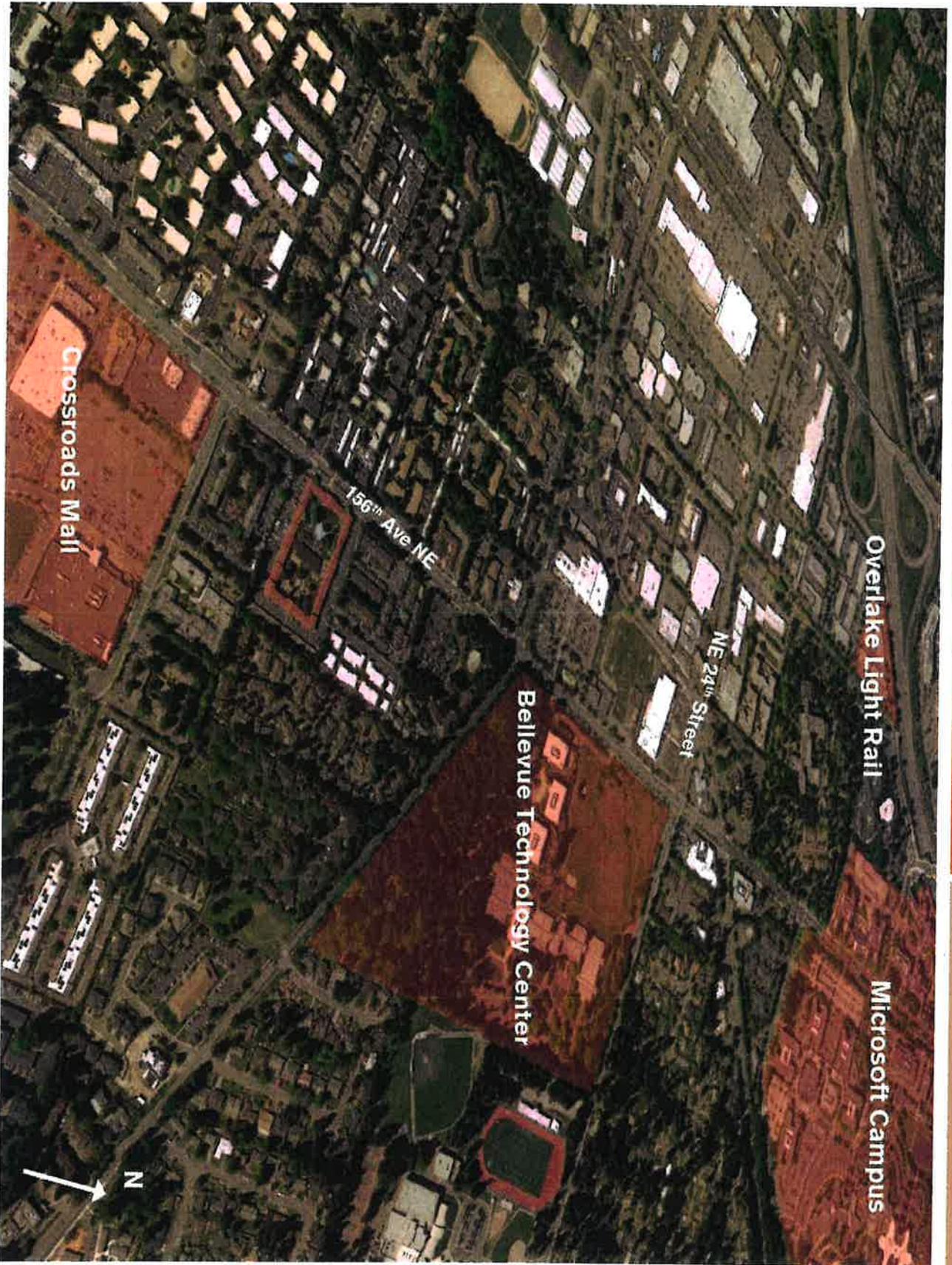
ATTACHMENT B

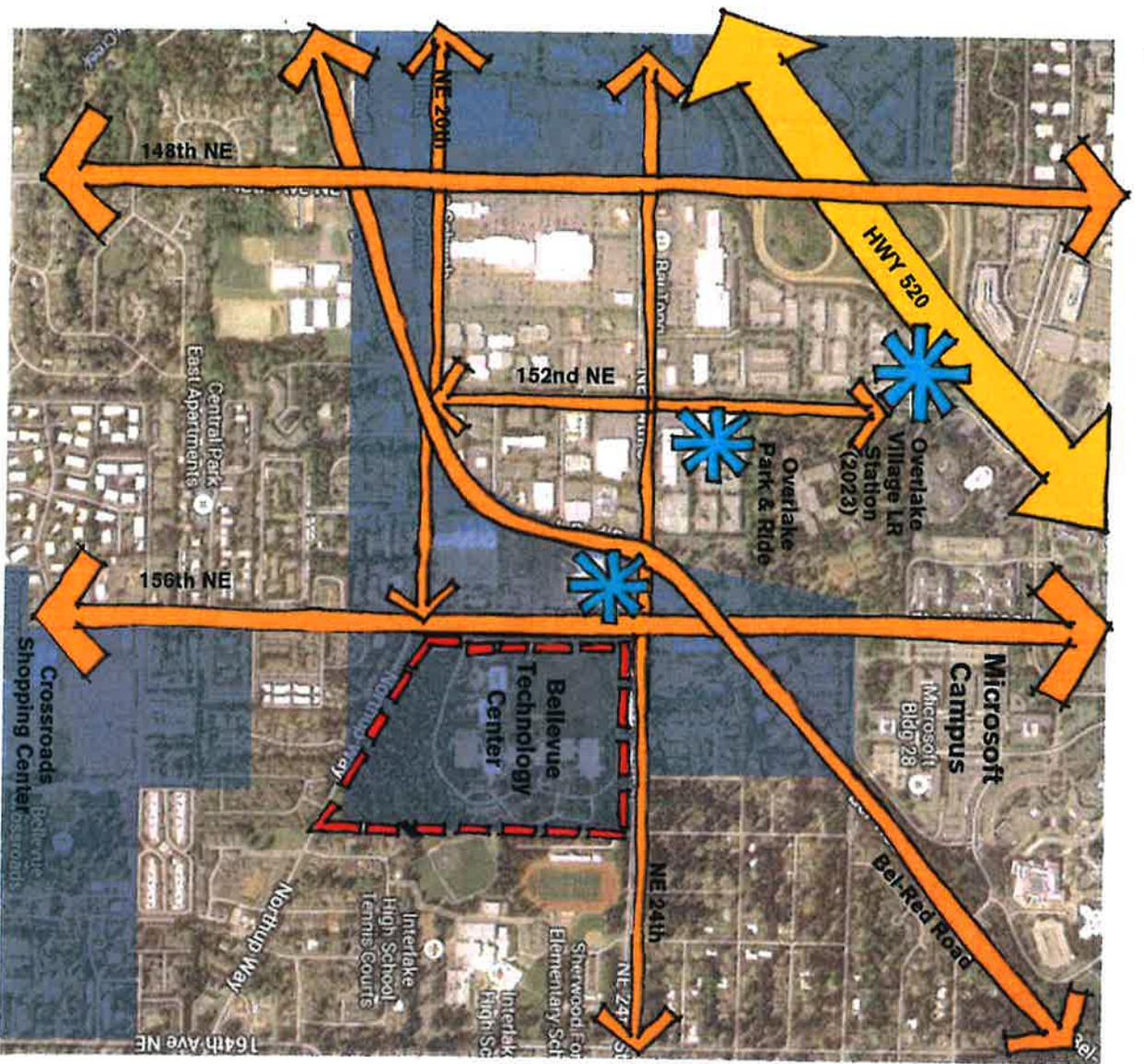
BELLEVUE TECHNOLOGY CENTER

CITY OF BELLEVUE

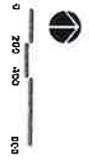
2019 COMPREHENSIVE PLAN AMENDMENT

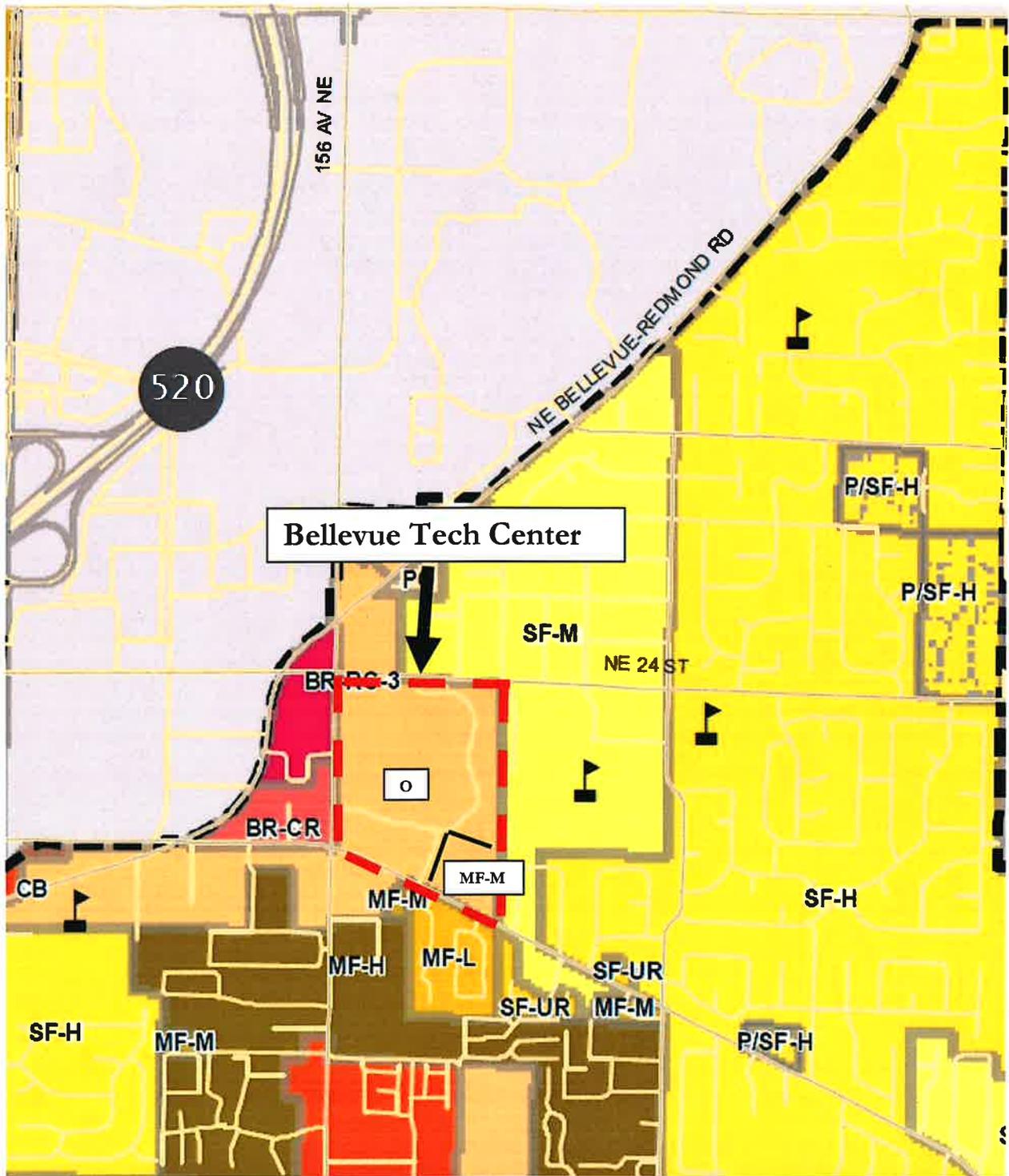






Major Employment Centers from Map ED-1





NE Bellevue Subarea Map Excerpt

Received
JAN 31 2019
Permit Processing

ENVIRONMENTAL CHECKLIST

10/9/2009

Thank you in advance for your cooperation and adherence to these procedures. If you need assistance in completing the checklist or have any questions regarding the environmental review process, 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).

INTRODUCTION**Purpose of the Checklist:**

The State Environmental Policy Act (SEPA), Chapter 43.21c RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the City of Bellevue identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the City decide whether an EIS is required.

Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Answer the questions briefly, with the most precise information known, or give the best description you can. You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer or if a question does not apply to your proposal, write "do not know" or "does not apply." Giving complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the Planner in the Permit Center can assist you.

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. Include reference to any reports on studies that you are aware of which are relevant to the answers you provide. The City may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impacts.

Use of a Checklist for Nonproject Proposals: *A nonproject proposal includes plans, policies, and programs where actions are different or broader than a single site-specific proposal.*

For nonproject proposals, complete the Environmental Checklist even though you may answer "does not apply" to most questions. In addition, complete the Supplemental Sheet for Nonproject Actions available from Permit Processing.

For nonproject actions, the references in the checklist to the words *project*, *applicant*, and *property or site* should be read as *proposal*, *proposer*, and *affected geographic area*, respectively.

Attach an 8 ½" x 11 vicinity map which accurately locates the proposed site.

Received**JAN 31 2019****Permit Processing**

BACKGROUND INFORMATION

Property Owner: KBS SOR 156th Avenue Northeast, LLC

Proponent: Same

Contact Person: Jason Espirtu

(If different from the owner. All questions and correspondence will be directed to the individual listed.)

10900 NE 8th Street, Suite 225 Bellevue, WA 98004

Address:

Phone: (206) 737-4321

Proposal Title: Bellevue Technology Center Affordable Housing Comprehensive Plan Amendments

Proposal Location: Southeast corner of 156th Avenue NE and NE 24th Street

(Street address and nearest cross street or intersection) Provide a legal description if available.

Parcel Nos: 880300-0010, -0020, -0030, -0040, -0050, -0060

Please attach an 8 1/2" x 11" vicinity map that accurately locates the proposal site.

Give an accurate, brief description of the proposal's scope and nature:

1. General description: Crossroads Subarea Comprehensive Plan amendment to encourage infill housing, affordable housing and transit-oriented development and open space preservation
2. Acreage of site: 46 acres
3. Number of dwelling units/buildings to be demolished: N/A
4. Number of dwelling units/buildings to be constructed: N/A
5. Square footage of buildings to be demolished: N/A
6. Square footage of buildings to be constructed: N/A
7. Quantity of earth movement (in cubic yards): N/A
8. Proposed land use: Office and residential
9. Design features, including building height, number of stories and proposed exterior materials:
N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.
10. Other

Estimated date of completion of the proposal or timing of phasing:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

No. Proposal is for Comprehensive Plan text and map amendments. Any future development would be subject to project-specific review.

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

N/A.

Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. List dates applied for and file numbers, if known.

None.

List any government approvals or permits that will be needed for your proposal, if known. If permits have been applied for, list application date and file numbers, if known.

Rezone for multifamily-medium designation
Project specific review (if any)

Please provide one or more of the following exhibits, if applicable to your proposal.
(Please check appropriate box(es) for exhibits submitted with your proposal):

- Land Use Reclassification (rezone) Map of existing and proposed zoning
- Preliminary Plat or Planned Unit Development
Preliminary plat map
- Clearing & Grading Permit
Plan of existing and proposed grading
Development plans
- Building Permit (or Design Review)
Site plan
Clearing & grading plan
- Shoreline Management Permit
Site plan

A. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site: Flat Rolling Hilly Steep slopes Mountains Other

b. What is the steepest slope on the site (approximate percent slope)? 5%

c. What general types of soil are found on the site (for example, clay, sand, gravel, peat, and muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Gravelly sandy loam (Source: US Department of Agriculture Natural Resources Conservation Service Soil Survey -- December, 2010)

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

There are no surface indications or history of unstable soils in the immediate vicinity to the best of our knowledge.

- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

None proposed

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

N/A.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

2. AIR

- a. What types of emissions to the air would result from the proposal (i.e. dust, automobile odors, and industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

No.

- c. Proposed measures to reduce or control emissions or other impacts to the air, if any:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

3. WATER

- a. Surface

- (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.

No.

- (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.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- (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.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- (5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

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.

No.

b. Ground

- (1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description.

N/A.

- (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.

N/A.

c. Water Runoff (Including storm water)

- (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.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

4. Plants

a. Check or circle types of vegetation found on the site:

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

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

c. List threatened or endangered species known to be on or near the site.

None known.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

5. ANIMALS

a. Check or circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

- Birds: hawk, heron, eagle, songbirds, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other:

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

None known.

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

None known.

d. Proposed measures to preserve or enhance wildlife, if any:

N/A. Any future project-level development will comply with all applicable federal, state and local regulations.

6. Energy and Natural Resources

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

No.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

7. Environmental Health

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.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

(1) Describe special emergency services that might be required.

N/A.

(2) Proposed measures to reduce or control environmental health hazards, if any.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

b. Noise

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

Noise consistent with urban environment (i.e., traffic on vicinity roads).

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- (3) Proposed measures to reduce or control noise impacts, if any:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties?

Office park. Adjacent properties include a high school, retail and single- and multi-family residential uses

- b. Has the site been used for agriculture? If so, describe.

No.

- c. Describe any structures on the site.

Nine low-rise office structures with associated parking.

- d. Will any structures be demolished? If so, what?

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- e. What is the current zoning classification of the site?

Office.

- f. What is the current comprehensive plan designation of the site?

Office.

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

N/A.

- h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

No.

- i. Approximately how many people would reside or work in the completed project?

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

- j. Approximately how many people would the completed project displace?

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including the Land Use Code and concurrency standards.

9. Housing

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

None.

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

N/A.

10. Aesthetics

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

11. Light and Glare

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A.

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

Interlake High School athletic field events and light from adjacent residential uses may affect future proposals.

d. Proposed measures to reduce or control light or glare impacts, if any:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project level-development will comply with all applicable federal, state and local regulations, including the Land Use Code.

12. Recreation

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

Interlake High School and Sherwood Forest Elementary School is directly east of the subject property. Highland Middle School is to the west of the subject property. Crossroads Park is to the south of the subject property.

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

No.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including the Land Use Code.

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No.

b. Generally describe any landmarks or evidence of historic, archeological, scientific, or cultural importance known to be on or next to the site.

None known.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

NE 24th Street, Northup Way and 156th Avenue NE; SR 520 and future Overlake Village light rail are nearby.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

Yes. Metro Rapid Ride "B" Line stop is located directly adjacent to the Property. Additionally, the future Sound Transit light rail station at Overlake Village within 1/2 mile of the Property is expected to be operational by 2023.

c. How many parking spaces would be completed project have? How many would the project eliminate?

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

No.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including the Land Use Code and concurrency standards.

15. Public Services

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations.

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

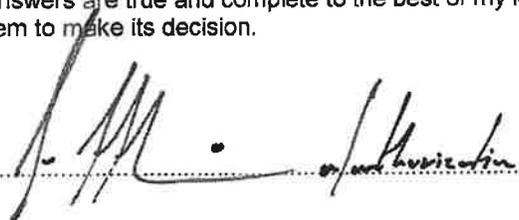
All utilities are available at site except for septic systems.

b. 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.

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

Signature

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

Signature.......... Date Submitted..... 01/30/2019

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. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

Proposed measures to avoid or reduce such increases are:

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulation.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level 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. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including City of Bellevue Energy Code.

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. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level 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. Proposal is for Comprehensive Plan text amendments. The Proposal would increase compatibility of the NE Bellevue Subarea plan with the updated Comprehensive Plan, including but not limited to the Land Use, Economic Development and Transportation goals and policies.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including the Land Use Code.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed.

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

N/A. Proposal is for Comprehensive Plan text and map amendments; no development is proposed. Any future project-level development will comply with all applicable federal, state and local regulations, including the Land Use Code and City's concurrency standards.

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 will not conflict with local, state or federal laws or requirements for the protection of the environment.