



MEMORANDUM

DATE: September 2, 2014

TO: Chair Capron and Members of the East Bellevue Community Council

FROM: Carol Helland, Land Use Director, 452-2724, chelland@bellevuewa.gov
Mike Bergstrom, Principal Planner, 452-2970, mbergstrom@bellevuewa.gov
Development Services Department

SUBJECT: Courtesy Hearing on Land Use Code Amendment – Camp and Conference Center Land Use District (Sambica)

INTRODUCTION

At your September 2, 2014 meeting, the EBCC will hold a courtesy hearing on a proposed amendment to create a new Camp and Conference Center land use district in the Land Use Code. The Planning Commission held their most recent study session on the proposed amendment on June 11, 2014, and will hold a public hearing on this draft on September 10.

BACKGROUND

The new district – Camp and Conference Center (CCC) – is consistent with a Comprehensive Plan Amendment approved by Council in February 2009 (Attachment A). That CPA amended the Comprehensive Plan to create a Camp and Conference Center land use designation, and amended the Newcastle Subarea Plan policies to support the application of this land use designation to the site of the Sammamish Bible Camp (Sambica) (Attachment B). However, while the Comprehensive Plan now applies a CCC designation to the Sambica property, corresponding zoning cannot be applied to the site until an ordinance that establishes such a district in the Land Use Code, together with use and development standards and regulations, is developed and adopted. That is what this amendment will accomplish (Attachment C).

The Planning Commission began working on this ordinance in 2010, and held several study sessions throughout 2010 and 2011. A public hearing was expected to be held in the Fall of 2011. However, due to other priorities and the lack of an urgent need to complete the ordinance, the hearing did not occur, and progress slowed and was eventually suspended. Staff and the Planning Commission have recently renewed efforts on this ordinance and it is now ready to proceed to a public hearing.

The EBCC should note that, while the Sambica site is outside of the EBCC jurisdiction, the creation of a new land use district in the Land Use Code is a “city-wide” action. As such, a CCC designation could be applied to properties other than the Sambica site in the future if further amendments to the Comprehensive Plan were to create policy support for its use in other areas of the city. Staff has not identified any potential sites for future application of this district within the EBCC jurisdiction.

PROPOSED ORDINANCE

The draft ordinance is shaped by four principles:

- Distinguish the mix of existing and anticipated future land uses
- Assure the predominant non-commercial character of a camp and conference center
- Provide predictability in development processes
- Maintain compatibility with the surrounding neighborhood

It also contains elements to manage the overall intensity of a CCC site and maintain compatibility with the surrounding neighborhood by:

- Defining the types of uses in a CCC and their connections to each other;
- Adapting existing Land Use Code processes including the Master Development Plan and Design Review;
- Setting new standards for reviewing master planning over time through a physical site plan;
- Establishing specific dimensional, landscape, and other site development standards as a measure of overall site intensity; and
- Providing site and building design guidelines for qualitative design solutions.

The draft ordinance contains the following sections:

- 20.25N.010 – Applicability
- 20.25N.020 – Master Development Plan Required
- 20.25N.030 – Design Review Required
- 20.25N.040 – Uses in the CCC District (permitted, subordinate, conditional)
- 20.25N.050 – Dimensional Requirements (setbacks, impervious surface, lot coverage, building height)
- 20.25N.060 – Landscape Requirements
- 20.25N.070 – Other Development Standards (signage, trip generation measurement, parking, noise)
- 20.25N.080 – Design Guidelines (general, site, building)

It also includes conformance amendments to other parts of the Land Use Code to ensure internal code consistency.

CONCLUSION

Staff will be present at your September 2 meeting to answer any questions you might have about this proposed ordinance. Following the courtesy hearing, any feedback or comments you have on the proposed ordinance will be forwarded to the Planning Commission for their consideration at the September 10 public hearing. Final action on the ordinance by Council is expected to occur in Fall, 2014. Following that action, staff will return to the EBCC at a public hearing and request your approval or disapproval of the final ordinance.

NEXT STEPS

Adoption of the ordinance will entail the steps listed below.

1. September 10, 2014 - Planning Commission public hearing and recommendation to Council
2. TBD - Council study session – transmittal of Planning Commission recommendation
3. TBD - Council action on ordinance
4. TBD - East Bellevue Community Council public hearing and final action

ATTACHMENTS

- A. Ordinance No. 5859 Amending the Comprehensive Plan
- B. Map of Sambica CCC Comprehensive Plan Designation
- C. Draft Camp and Conference Center Land Use District Ordinance

CITY OF BELLEVUE, WASHINGTON

ORDINANCE NO. 5859

AN ORDINANCE relating to the Comprehensive Plan of the City of Bellevue, as required and adopted pursuant to the Growth Management Act of 1990, as amended (Chapter 36.70A RCW); adopting 2008 amendments to the Comprehensive Plan, known as the Sambica CPA, amending the Glossary and the Newcastle Subarea Plan; and establishing an effective date.

WHEREAS, on September 15, 2008, the City Council initiated the Sambica Comprehensive Plan Amendment ("CPA") to modify the Glossary and the Newcastle Subarea Plan; and

WHEREAS, the Planning Commission held a public hearing on November 19, 2008, with regard to the Sambica CPA; and

WHEREAS, the Planning Commission recommended that the City Council approve such proposed amendment; and

WHEREAS, the City Council has considered the Sambica CPA concurrently with the other 2008 Comprehensive Plan amendments; and

WHEREAS, the City Council finds that the Sambica CPA satisfies the decision criteria established in Part 20.30(I) of the Land Use Code; and

WHEREAS, the City of Bellevue has complied with the requirements of the State Environmental Policy Act (Chapter 43.21C RCW) and the City Environmental Procedures Code (Chapter 22.02 BMC); now, therefore,

THE CITY COUNCIL OF THE CITY OF BELLEVUE, WASHINGTON, DOES HEREBY ORDAIN AS FOLLOWS:

Section 1. The Glossary of the City of Bellevue's Comprehensive Plan is hereby amended by the addition of a new definition as follows:

Camp and Conference Center – (CCC) – A land use designation that provides for a mix of group camp, conference, retreat, recreation, and functional use activities. These activities are primarily for use by organizations and schools and the families and individuals they enroll. The purpose of the designation is to maintain the compatibility of this unique mix of uses with the surrounding neighborhood by using site design standards through the Land Use Code that both limit the overall intensity of the site and protect lower intensity uses from the effects of higher intensity uses.

The CCC designation is predominantly non-commercial but may include small-scale, neighborhood business retail and service uses that are functionally related in nature and size to the property designated CCC and which do not exceed 5,000 square feet individually or 10,000 square feet in total.

Section 2. Policy S-NC-10 of the Newcastle Subarea Plan contained in the City of Bellevue's Comprehensive Plan is hereby amended as follows:

POLICY S-NC-10. Encourage a land use pattern throughout the Subarea which accommodates future growth, ensures efficient use of facilities and services, protects existing neighborhoods, encourages historic community uses to continue, and provides the opportunity for an adequate amount of retail and professional services to meet local needs.

Section 3. Policy S-NC-10a of the Newcastle Subarea Plan contained in the City of Bellevue's Comprehensive Plan is hereby amended as follows:

POLICY S-NC-10a. Support a master site planning process for redevelopment of the Sambica CCC-designated parcels. A master site plan will limit the overall intensity of the site to a predominantly non-commercial character consistent with the CCC designation and achieve an integrated site design with transition and performance standards that protect lower intensity uses from the effects of higher intensity uses. A master site plan should address standards of building height and location, landscape buffers, impervious surface ratios, combined trip generation, limited signage size, and parking.

Section 4. Policy S-NC-10b of the Newcastle Subarea Plan contained in the City of Bellevue's Comprehensive Plan is hereby amended as follows:

POLICY S-NC-10b. Encourage the use of development review tools for Sambica that distinguish the mix of land uses proposed for Sambica redevelopment to assure the predominant non-commercial character of the camp and conference center, provide predictability in development processes, and maintain compatibility with the surrounding neighborhood.

Discussion: *The Sammamish Bible Camp—Sambica—was established along the shores of Lake Sammamish in 1919. It is historically valued by the surrounding community. As Sambica changes over time to maintain its functions and to provide relevant services to its users its buildings and structures will change too.*

The current uses as of 2008 at Sambica include group camp facilities, conference and retreat facilities, day care, and outdoor and indoor recreation activities. Other uses that are part of Sambica include lodging

and dining, active recreation, administrative offices, staff housing, maintenance and storage, and a camp store.

The camp and conference center designation also allows for redevelopment which may include active recreation facilities including gymnasiums and pools. Redevelopment may also include small-scale, neighborhood business retail and service uses that are functionally related in nature and size to the property designated CCC and which do not exceed 5,000 square feet individually or 10,000 square feet in total.

Section 5. The Newcastle Subarea Plan Map contained in the City of Bellevue's Comprehensive Plan is hereby amended as set forth in Attachment E1 and by this reference fully incorporated herein.

Section 6. This ordinance shall take effect and be in force five days after its passage and legal publication. This ordinance, the Newcastle Subarea Plan and map, and the city's Comprehensive Plan shall be available for public inspection in the office of the City Clerk.

Passed by the City Council this 17th day of Feb, 2009, and signed in authentication of its passage this 17th day of Feb, 2009.

(SEAL)



Grant S. Degginger, Mayor

Approved as to form:
Lori M. Riordan, City Attorney



Mary Kate Berens, Deputy City Attorney

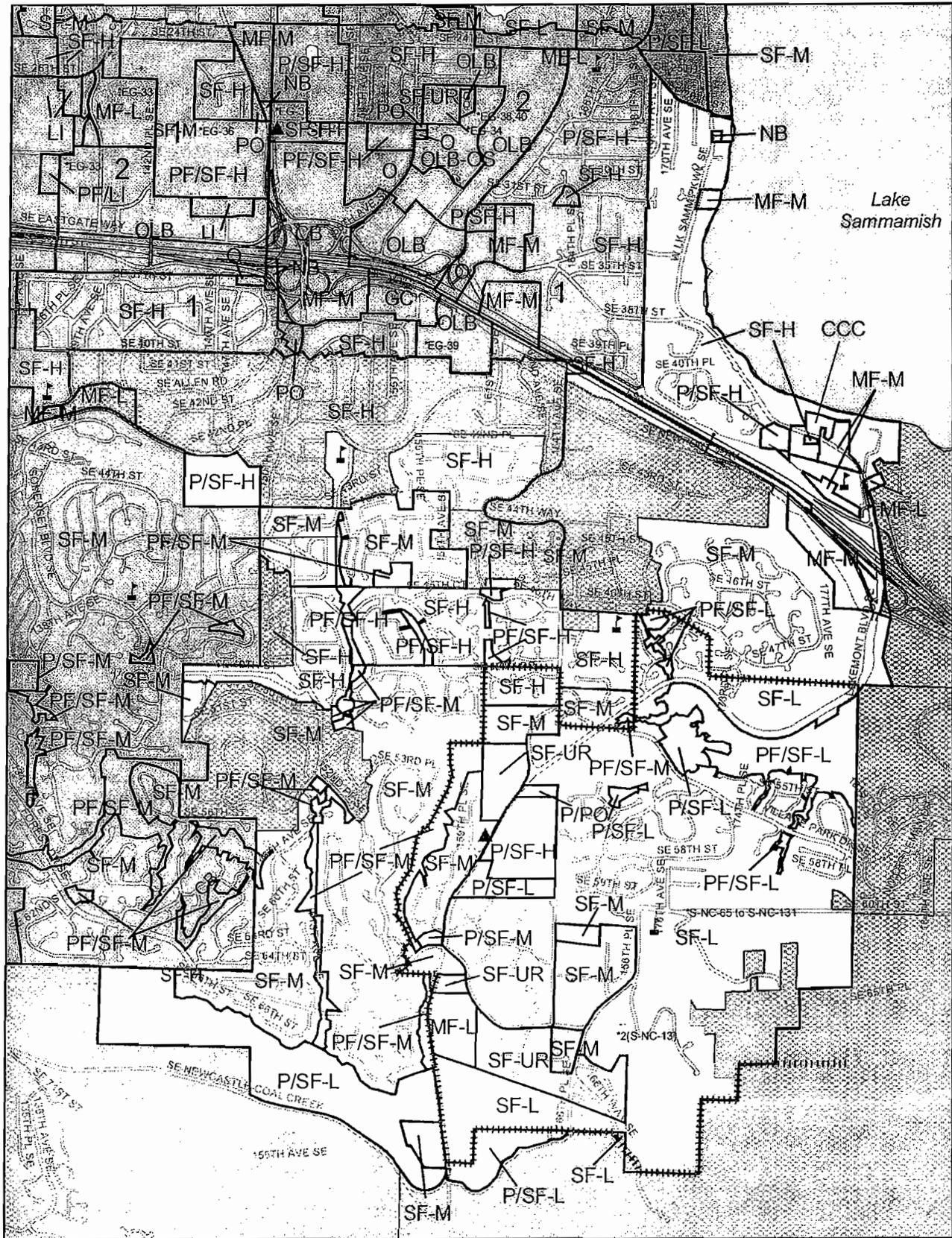
Attest:



Myrna L. Basich, City Clerk

Published: 2/20/09

ATTACHMENT E1



**FIGURE S-NC.2
Newcastle Land Use Plan**



- SF Single Family
- MF Multi Family
- L Low Density
- M Medium Density
- H High Density
- UR Urban Residential

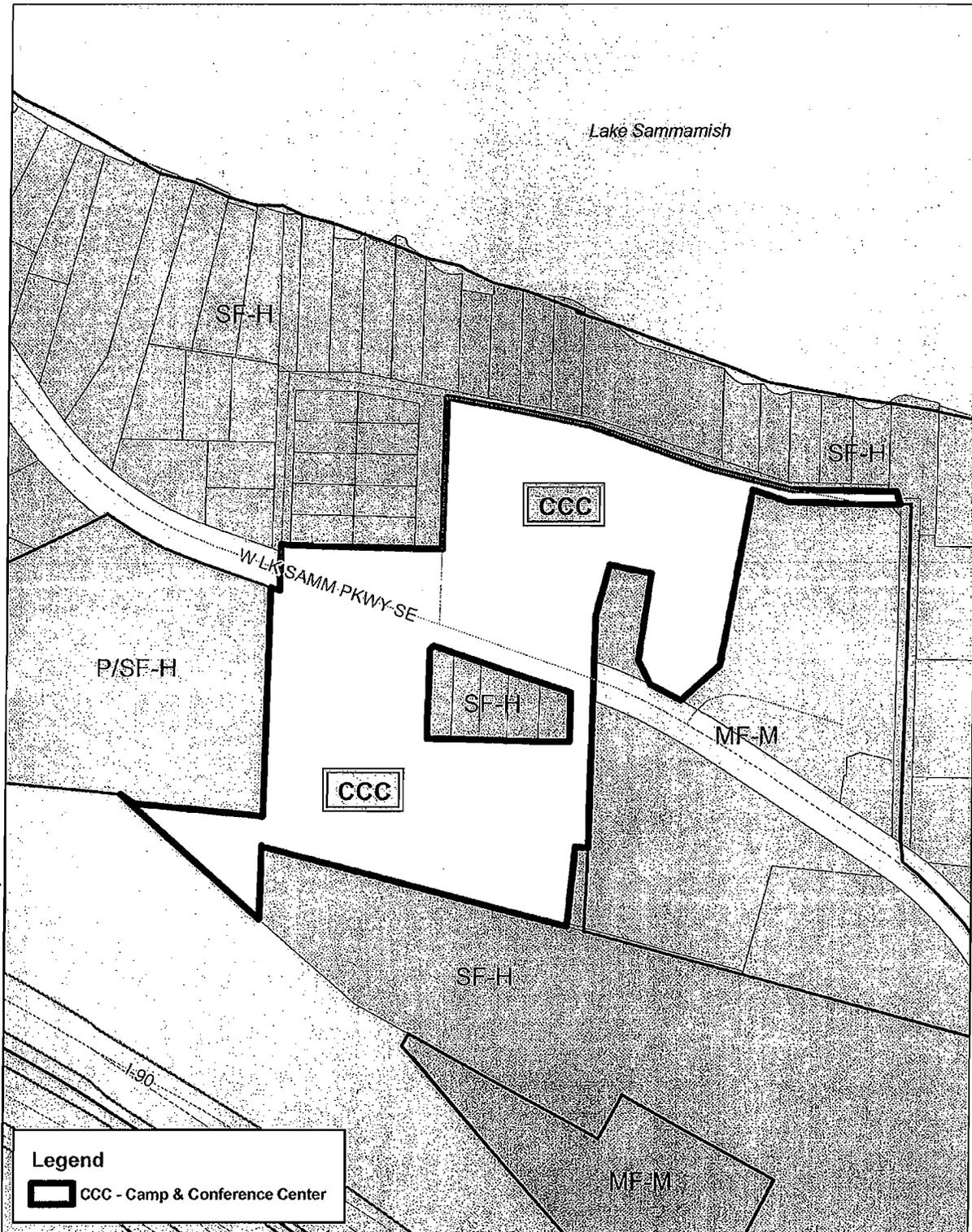
- PO Professional Office
- O Office
- OLB Office, Limited Business
- OLB-OS Office, Open Space
- NB Neighborhood Business
- CB Community Business

- GC General Commercial
- LI Light Industrial
- PF Public Facility
- P Park

- ▲ Fire Stations
- ⌚ Public Schools
- ▭ Lakes
- Bellevue City Limits (6/2008)
- ||||| Village Overlay



Attachment B



March 2008



Sambica
Comprehensive Plan Designations

Draft Camp and Conference Center District Amendment

Section 1. A new Part 20.25N of the Bellevue Land Use Code is hereby adopted as follows:

Part 20.25N Camp and Conference Center District

20.25N.010 Applicability

- A. This Part 20.25N LUC, Camp and Conference Center (CCC) District, contains standards and guidelines that apply to development and activity within the CCC District.
- B. This Part 20.25N LUC is subject to Part 20.25H LUC - Critical Areas Overlay District.
- C. This Part 20.25N LUC is not subject to Part 20.25B LUC - Transition Area Design District.

20.25N.020 Master Development Plan Review Required

A. Review Required

A Master Development Plan (MDP) review under Part 20.30V LUC is the means by which the City shall ensure that site development in a CCC district is consistent with the Comprehensive Plan and the provisions of this Part 20.25N and meets all applicable site development standards and guidelines of the LUC. The applicant shall record the approved MDP with King County in accordance with LUC 20.30V.180, after CCC zoning is established for the site encompassed in the MDP. Per LUC 20.30V.140 the applicant may, but is not required to, request that the MDP constitute a Binding Site Plan pursuant to Chapter 58.17 RCW.

B. Standards and Requirements

All development within a single CCC site shall be governed by MDPs reviewed by the Director pursuant to Part 20.30V LUC.

1. At a minimum, the MDP shall depict the following:
 - a. Existing conditions, including:
 - i. The proposed continued use, maintenance, and/or remodeling of existing conditions, including uses and structures and their current locations, which are permitted in a CCC District.
 - ii. The proposed continuation of existing conditions, including uses and structures and their current locations, which are not permitted in a CCC District. The nonconforming provisions of LUC 20.20.560 and/or the Temporary Use provisions of Part 20.30M LUC apply to these existing conditions.
 - iii. The proposed discontinuation of existing conditions, including uses and structures and their current locations, and general timing, sequencing, or triggering of same.

- b. The proposed general location or placement of proposed uses, structures, facilities, and site features;
 - c. A list of proposed principal and subordinate uses and their general locations;
 - d. Conformance with the dimensional requirements of LUC 20.25N.050, based on the total area contained in the Master Development Plan;
2. Phasing. An MDP may show site development in geographically-defined phases per LUC 20.30V.130.
 3. Modifications to an approved MDP or phased MDP shall be governed by LUC 20.30V.160 except modifications to existing conditions shall be governed by LUC 20.25N.020.B.1.a.ii.

20.25N.030 Design Review Required

Design Review pursuant to Part 20.30F LUC shall be required for any proposed development in a CCC District, except for freestanding structures proposed for religious activities which will be reviewed through the Conditional Use review process. Modifications or additions to an approved Design Review in a CCC District shall be governed by LUC 20.30F.175. The dimensional requirements, other development standards, and design guidelines of this Part 20.25N shall be ensured through the Design Review process.

20.25N.040 Uses in the CCC District (1) (2) (5)

Conference center for professional, educational, or religious meetings, seminars, or retreats	P
Structures, facilities, and activities including food preparation and eating, lodging for camp attendees, recreation facilities, and administrative and maintenance functions associated with the above permitted uses. (6)	P
Subordinate uses (3)	
Recreation uses associated with conference center for professional, educational, or religious meetings, seminars, or retreats - Indoor public assembly and camping sites (6)	S
Dwelling units for CCC staff	S
Miscellaneous retail trade: drug stores, camp stores, gift stores, jewelry, clothing, bookstores, newsstands, florist, photo supplies, video sales/rental and vendor carts, if located in a structure containing one of the above permitted uses. (7)	S
Childcare services	P
Religious activities (4)	C
Accessory parking (8)	P

Wireless communication facilities, including satellite dishes (9)	A/P
Utility facility	C
Local utility system	P
Regional utility system	C
Essential public facilities (10)	C
Transit facilities (11)	P
Highway and street right-of-way	P
Electrical Utility Facility (12)	A/C

P = Permitted Use

S = Permitted only as a subordinate use to the above-listed permitted use

C = Conditional Use (see Part 20.30B or 20.30C LUC)

A = Administrative Conditional Use (see Part 20.30E)

Notes:

- (1) Existing Conditions as defined in this Part 20.25N LUC are permitted subject to an approved MDP. See LUC 20.25N.020.B.1.a.
- (2) Uses must be included into a MDP approval pursuant to LUC 20.25N.020.
- (3) These uses are permitted only as a subordinate use to the above permitted uses. See LUC 20.20.840; Subsections C1 and C.3 do not apply in a CCC district. Subordinate uses shall be located on the same site or in the same structure as the permitted use in accordance with the approved MDP.
- (4) Freestanding structures proposed for Religious Activities permitted in a CCC do not require Design Review. Compliance with the approved MDP shall be assured through the Conditional Use permit process.
- (5) See LUC 20.25N.070 for Other Development Standards that apply to these uses.
- (6) Recreation uses exclude private health clubs, athletic clubs, outdoor public assembly, and hunting clubs, gun clubs or gun sports activities.
- (7) May not exceed 5,000 gross square feet individually or 10,000 gross square feet total within the boundary of a CCC. The lineal feet of commercial and retail uses along a street frontage are limited through the approval of a MDP.
- (8) Accessory parking is permitted to serve only the uses located within the CCC district pursuant to an approved MDP and requires approval through the review process required for the primary use which it serves.
- (9) Wireless communication facilities must meet the requirements of LUC 20.10.440 – Notes 14 and 21, Transportation and Utilities, and LUC 20.20.195. Administrative Conditional Use approval is required for freestanding monopole facilities and wireless facilities integrated into parking lot light poles and/or adjacent street poles (within the right-of-way) to the site. Building-mounted wireless facilities are permitted outright. Any ground-mounted equipment must be adequately screened per LUC 20.20.195. Satellite dishes are permitted outright.
- (10) Refer to LUC 20.20.350 for general requirements applicable to essential public facilities.
- (11) Transit facilities include transit stops and high-capacity transit stops.
- (12) Refer to LUC 20.10.440 – Note 22, Transportation and Utilities.

LUC 20.25N.050 Dimensional requirements

Minimum Setback (1)			Maximum Impervious Surface (6)	Maximum Lot Coverage (6)	Building Height (2) (3) (4)
Front (5)	Rear	Side			
20'	25'	20'	65%	40%	30'

Notes:

- (1) Setbacks shall be measured from the exterior boundaries of the entire area contained in the approved MDP.
- (2) Maximum building height in CCC districts is 30 feet measured from the average elevation of the existing grade around the building to the highest point of a flat roof, or 35 feet to the ridge of a pitched roof. Shoreline height is measured per LUC 20.25E.080.
- (3) Maximum building height of any individual building facade is 40 feet measured from the existing grade at the building wall to the ridge of a pitched roof or top of a flat roof.
- (4) An increase in building height, including any building façade, of up to a maximum 55' (to a pitched or flat roof) is allowed for specific uses as identified in the Master Development Plan and the requirements noted below:
 - a. Such height increase is approved under both the Master Development Plan and Design Review for the structure; and
 - b. Rooftop mechanical equipment shall be subject to the height limitations in LUC 20.25B.040.A.1; and
 - c. The increase in height is necessary to accommodate uses or equipment functionally related to a permitted CCC use such as swimming pools, performing arts theatres, and gymnasiums; and
 - d. Any portion of the structure exceeding the maximum building height is stepped back from any property line a minimum distance of 50 feet unless a reduction is approved through the Master Development Plan process.
- (5) The front yard setback for retail/service/commercial uses is 0'. These uses are subject to LUC 20.25N.080, Building Design Guidelines – Retail/Service/Commercial Uses.
- (6) Maximum impervious surface and maximum lot coverage shall be based on the total site area contained in the approved MDP.

20.25N.060 Landscape requirements

Perimeter (1)	Landscaping Requirement (2) (3) (4)
Street Frontage	10' wide Type III landscaping
Interior Property Lines	10' wide Type III landscaping

Notes:

- (1) These requirements apply to the exterior boundaries of the entire area contained in the approved MDP.
- (2) The tree retention provisions of LUC 20.20.900 for subdivisions (30%) apply in the CCC district.
- (3) If a retail/service/commercial use is located at sidewalk with a 0' building setback then the landscaping requirement may be reduced to 0', per the approved MDP.
- (4) Existing vegetation may be used in lieu of the landscape requirement noted above.

The Director may approve alternative landscaping options in accordance with LUC 20.20.520.J.

20.25N.070 Other Development Standards

A. Signage

The provisions of BCC 22B.10.040 LUC—Office, research and development, and multifamily residential district signs—shall regulate signage proposed in CCC districts, EXCEPT:

1. Rooftop signs are prohibited.
2. Any building-mounted sign shall be located on the face of the building containing the main entrance to the building premises and the sign, if facing abutting residential property, shall be located more than 50 feet from the abutting residentially-zoned property line.
3. Signs in this district may be internally or externally illuminated. If externally illuminated, the illumination source shall be located, shaded, shielded, or directed so that it is not visible from a public street or adjoining residentially-zoned property. All sign illumination shall be turned off between the hours of 10:00 p.m. and 6:00 a.m.
4. Directional signs, as defined in BCC 22B.10.020, are permitted and are not included in the number of primary signs.
5. Incidental signs, as defined in BCC 22B.10.020, are permitted and are not included in the number of primary signs.

B. Trip generation measurement

Land uses shall be defined as follows for measuring trip generation rates:

1. Proposed CCC principal land uses shall be calculated with a single trip generation rate which shall be based on Institute of Transportation Engineers' data, applicant information and other relevant material.
2. Proposed CCC subordinate land uses shall be calculated individually for purposes of determining a specific, separate trip generation rate. Each individual subordinate land use's trips shall be added to the CCC site's total trip volume. All proposed other land uses within a CCC shall be calculated individually for purposes of determining a specific, separate trip generation rate. Each individual other land use's trips shall be added to the CCC site's total trip generation volume.

3. Existing conditions land uses shall be assigned the appropriate land use (principal, subordinate, or other) for purposes of the CCC total trip generation rate.

C. Parking

Parking shall be required through unspecified use parking analysis established by the Director through LUC 20.20.590.F.2. Such analysis shall individually identify the maximum number of parking stalls required for uses which are identified and permitted in the MDP. Shared use provisions may be considered.

D. Noise

Uses in the CCC District are subject to the City of Bellevue Noise Control Code (Chapter 9.18 BCC). For the purpose of noise control, the CCC District shall be treated as a Residential land use district: Class A EDNA pursuant to BCC 9.18.025.

20.25N.080 Design guidelines

In addition to the decision criteria in LUC 20.30F.145, the following guidelines apply:

A. General Guidelines

Each structure and all proposed site development must comply with the approved MDP. If an application for Design Review [when required] contains elements inconsistent with the approved MDP, the Director may not approve the Design Review until the required MDP is amended to include those elements.

B. Site Design Guidelines

1. Develop site improvements and amenities consistent with the phasing approved in an MDP;
2. Provide visual and functional connections between uses within the CCC District by incorporating areas of vegetation, outdoor spaces and pedestrian connections;
3. Consider surrounding vegetation, topography, street patterns, parking configuration and building massing in order to result in a compatible fit between proposed development and adjacent non-CCC residential development;
4. The largest CCC buildings with the largest bulk (size, height) shall be located to minimize impacts on adjacent residential uses. See Footnote (4)(d) under LUC 20.25N.050.
5. Maximize the retention of existing significant (see LUC 20.50.046 – Significant Tree) vegetation to soften visual impacts on adjacent residential areas.
6. Design vehicular access to the site so that traffic is not directed through an abutting residential district.

7. Minimize the visual impact of parking facilities by integrating parking facility structures and lots into the site, and by providing landscape screening where surface parking is located adjacent to residential uses or within setback areas.
8. Locate vehicle drop-off areas in close proximity to building entries.
9. Consider the following in designing outdoor spaces interior to the site:
 - a. Orientation. Orient to sunlight to the maximum extent feasible
 - b. Provide good physical and visual access from the interior space to sidewalks and walkways, so that the space is perceived as an extension of the sidewalk or walkway.
 - c. Ensure ready physical as well as visual access to the interior space, with special attention to elevation differences.
10. Innovative Techniques for Impervious Surface may be considered per LUC 20.20.460.G.

C. Building Design Guidelines – All Uses

1. Materials, finishes, and details should be complementary to each other and be consistent with the design intent of the MDP;
2. Locate service areas for trash dumpsters, loading docks and mechanical equipment away from public rights-of-way and residentially-zoned property where possible. Screen views of those elements if they cannot be located away from public frontages;
3. Incorporate weather protection and pedestrian amenities for transit facilities; and
4. Design rooftop mechanical equipment to be architecturally integrated with a building.

D. Building Design Guidelines – Retail/Service/Commercial Uses

In addition to the Building Design Guidelines in LUC 20.25N.080.C, buildings intended to house retail, service, or commercial uses shall comply with the following design guidelines:

1. Provide ground floor building elements that are accessible and comfortable to pedestrians through use of human-scale design elements, such as recessed entries, entrance canopies, planters, benches, variations in paving materials, and lighting features;
2. Consider weather protection in the site interior through use of sheltered walkways or sidewalks; and
3. Design entries to be clearly identifiable from public rights-of-way adjacent to the CCC District or from a pedestrian walkway connected to a public right-of-way.

Section 2. Section 20.10.020 of the Bellevue Land Use Code is hereby amended to add Camp and Conference Center (CCC) to the district designations, as follows:

20.10.020 Establishment of land use districts.

Land use districts in the City are hereby established as follows:

District	Designation
<u>Camp and Conference Center</u>	<u>CCC</u>

Section 3. Section 20.10.100 of the Bellevue Land Use Code is hereby amended to read:

20.10.100 District descriptions.

LUC 20.10.180 through 20.10.395~~397~~ describe the purpose and scope of the City's land use districts. These sections may be used to guide the interpretation of the regulations associated with each district.

Section 4. Chapter 20.10 of the Bellevue Land Use Code is hereby amended to add the following section:

20.10.397 Camp and Conference Center (CCC)

A camp and conference center (CCC) provides areas for a unified mix of group day or residence camps and professional, educational, or religious meetings, conferences, seminars, and retreats and their associated facilities and activities. These are used primarily by organizations and schools and the families and individuals they enroll.

The purpose of the designation is to maintain the compatibility of this unique mix of uses with surrounding neighborhoods by limiting the overall intensity of the site, and protect lower intensity uses from the effects of higher intensity uses.

Section 5. Section 20.10.440 of the Bellevue Land Use Code is hereby amended to add the following language below each land use chart:

Permitted uses in the Camp and Conference Center District (CCC) are listed in LUC 20.25N.040.

Section 6. Section 20.25B.020.B of the Bellevue Land Use Code is hereby amended to add a new subparagraph 10, to read:

20.25B.020.B Transition Area Design District – Limitations

10. Development within the CCC Land Use District is not subject to Transition Area Design District requirements.

END