2016 Annual Threshold Review CPA Recommendation
and Consideration of Geographic Scoping
Site-Specific Amendment

Eastgate Office Park

Staff recommendation: Include the Eastgate Office Park CPA proposal in the 2016 annual CPA work program. **Expand** the geographic scope of the proposal.

Application Number: 16-123765 AC
Subarea: citywide
Original Addresses: N/A
Applicant(s): Eastgate Office Park Property, LLC

PROPOSAL

This is the Threshold Review stage of the annual Comprehensive Plan amendment (CPA) process. The purpose of Threshold Review is to determine whether a proposed amendment should be considered in the Comprehensive Plan amendment work program for Final Review.

The Comprehensive Plan Amendment process has two phases: Threshold Review—to determine whether a proposed amendment should be considered in the Comprehensive Plan amendment work program for Final Review; and Final Review, where the merits of an application are considered. Both phases use Land Use Code decision criteria for review.

This privately-initiated application would amend the map designation on this 14-acre site from Office (O) to Office Limited Business (OLB). This site is developed with 280,000 square feet of office in four buildings with surface parking. See Attachment 1.

The applicant asserts that the proposal will implement the City's Comprehensive Plan vision for this subarea by encouraging continued economic vitality and development capacity located in transit-oriented mixed-use centers, supported by a range of commercial uses, with urban design features that enhance the Eastgate character and provide streetscape improvements.

STAFF RECOMMENDATION

Staff recommends including this Comprehensive Plan amendment application in the 2016 work program.

By doing so, the proposal would be subject to full evaluation of its merits and impacts.

BACKGROUND

The site falls within the Eastgate/I-90 corridor project study area. However, no change was proposed for the site. The applicant suggested that the site was overlooked because it was considered as fully developed. The Office designation and zoning on this site have not previously been the subject of Comprehensive Plan amendment proposals. See Attachment 2.

THRESHOLD REVIEW DECISION CRITERIA

The Threshold Review Decision Criteria for an initiated Comprehensive Plan Amendment proposal are set forth in the Land Use Code Section 20.30I.140. Based on the criteria, Department of Planning and Community Development staff has concluded that the proposal **be included** in the annual CPA work program.

This conclusion is based on the following analysis:

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

The proposed amendment presents a matter appropriately addressed through Plan review.

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 three-year limitation does not apply to this proposal. Since the site was not amended by actions through the Eastgate Land Use and Transportation Project (realized through the CPU) the proposal is in compliance with these rules.

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

Whereas this area was part of the Eastgate Land Use and Transportation Study, the Comprehensive Plan amendments stemming from that initiative have already been adopted. If, as the applicant notes, the potential of this area was overlooked in that study, then there is no other ongoing venue for reviewing the designation of this site.

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

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

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

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

The proposed amendment 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 Plan to function as an integrated whole.

The applicant states that the Eastgate/I-90 Land Use and Transportation Project visioning missed a major opportunity to incorporate the Project's transit-oriented, walkable and neighborhood-sensitive policies to add moderate density at the Eastgate Office Park.

The changes in the Eastgate area that make this designation timely include the establishment of OLB and OLB-2 designations allowing for more mixed use density as well as the establishment of a true Transit Oriented Development designation around the Eastgate Park and Ride facility. Additional policies to increase mobility, access, and land use relationships to surrounding areas were adopted as well.

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 expansion of the geographic scope of the proposed Eastgate Office Park CPA.

The site is part of a cluster of Office-zoned properties in this portion of the Eastgate Subarea. In addition to this four-building office park there are two more single-building offices in this Office district filling in to the east adjacent to 156th Ave SE. These are similarly situated in regards to their site development status and relationship to the Eastgate Subarea's redevelopment focus. The city notified these properties of their inclusion in the proposal through the expansion of the geographic scope. Staff held a meeting with the property managers of the state-owned property and they acknowledge their participation in the review and amendment process.

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 (GMA), other state or federal law, and the Washington Administrative Code (WAC); or

The proposal is consistent with the intent of current general policies. Bellevue's land use pattern creates sufficient land capacity to achieve growth targets, while directing growth to appropriate areas. The growth strategy for Bellevue directs most of the city's growth to Downtown and other areas designated for compact, mixed use development served by a full range of transportation options, such as BelRed and Eastgate; the latter called out in the Land Use Element as a designated mixed-use center (Land Use Element p. 45).

If advanced, the proposal would be examined under a potential OLB designation. Either of the zone districts being proposed in the Eastgate/I-90 Study implementation effort (OLB and OLB-2) would permit up to 1 FAR. The potential to mix commercial and residential uses allowed in both O and OLB districts would not be limited by the 50% by-right restriction of the O designation. The additional allowed height (30'-45') would be influenced by the 0.5 or 1 FAR limits, and this additional height could be an issue on the north portion of the site subject to Transition.

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 COMMENT

PCD has received one telephone call on this application inquiring about the details of the proposal. We've also met with property managers at the state Department of Natural Resources (DNR) regarding their property here.

ATTACHMENTS

1. Application materials
2. Site map
3. Expansion of Geographic Scope
4. Letter from DNR

ATTACHMENT 1

Department of Planning & Community Development
425-452-6800 www.bellevuewa.gov

Application for
COMPREHENSIVE PLAN AMENDMENT

CPA YEAR 2016 APPLICATION DATE: 2/1/16	TECH INITIALS CM	AMANDA PROJECT FILE: 16-123765 AC

1. Project name Eastgate Office Park - Land Use Map designation change
2. Applicant name Eastgate Office Park Property, LLC Agent name John C. McCullough
3. Applicant address c/o MuCullough Hill Leary, P.S. 701 Fifth Avenue, Suite 6600
4. Applicant telephone (206) 812.3388 fax (__) ____ e-mail jack@mhseattle.com
5. Agent telephone (__) ____ fax (__) ____ e-mail ____

This is a proposal to initiate a site-specific Comprehensive Plan Amendment proposal [X] (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 128360-0060.

Proposed amendment to change the map designation from existing O to proposed OLB.
Site area (in acres or square feet) 611,265.
Subarea name Eastgate.
Last date the Comprehensive Plan designation was considered 1 / 17/ 06.
Current land use district (zoning) Office.
Is this a concurrent rezone application? [ ] Yes [X] No Proposed land use district designation ____.

Go to **BLOCK 3** Community Council: [X] 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.

Proposal is to change the designation of property located at 15325 - 15395 SE 30th Place in Eastgate subarea from Office (O) to Office-Limited Business (OLB) to align property with the City's vision for a transit-oriented Eastgate .

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

Last date the Comprehensive Plan policy or text was considered 1 /17 / 06.
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 attachment.

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 attachment.

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.

N/A

I have read the Comprehensive Plan and Procedures Guide [X]

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

Signature of applicant C Dempsey Date 2/1/2016

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 C Dempsey *Date* 2/1/2016
(Owner or Owner's Agent)

City of Bellevue Comprehensive Plan Amendment Application Addendum
February 1, 2016

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.*

In 2012, the City Council adopted the Eastgate/I-90 Land Use & Transportation Project (Eastgate/I-90 project), providing a vision for the growth of the Eastgate Subarea. The City's vision for Eastgate includes building on the success of the corridor as an employment center by adding moderate additional capacity and a greater mix of support retail and service uses. In addition, the City encouraged mixed-use transit-oriented development surrounding the transit center and supporting Bellevue College. The City adopted these Eastgate plan updates in late 2015.

The Eastgate visioning missed a major opportunity to incorporate the same transit-oriented, walkable and neighborhood sensitive policies to add moderate density at the Eastgate Office Park. The Eastgate Office Park is a four building office complex with approximately 280,000 sf. of office development on 14 acres between the Sunset Plaza area to the southwest, institutional uses to the west, Robinswood Park and limited single-family residential uses to the north and 156th Avenue SE to the east ("Property"). The Property's four office structures were completed in the mid-1980s.

The Eastgate Office Park fell within the Eastgate/I-90 project study area. However, the Eastgate/I-90 economic analysis appeared to assume the project was not a viable candidate for redevelopment. As a result, the Eastgate/I-90 project and its recommendations omitted any serious evaluation of the Property's potential for transit-oriented office redevelopment that could support the City's vision.

However, due to the Property's age, there are real opportunities for modest redevelopment consistent with the Eastgate/I-90 project policies. The Property provides an excellent venue to encourage a more diverse mix of office and specialty retail uses and enhance pedestrian connectivity through potential connections with the adjacent Robinswood Park and internal streetscape projects.

Redesignation of the Eastgate Office Park to Office/Limited Business (OLB) from Office (O) is consistent with both Bellevue's Comprehensive Plan and the Eastgate Subarea Plan. We understand that the City's emphasis regarding potential development standard changes is focused on the OLB zoning as the vehicle to accommodate infill growth and creating a more vibrant office environment. Overlooking this portion of the subarea will be a missed opportunity to redevelop with moderate infill density. The Proposal will implement the City's Comprehensive Plan vision for this subarea by encouraging continued economic vitality and development capacity located in transit-oriented mixed use centers, supported by a range of commercial uses, with urban design features that enhance the Eastgate character and provide streetscape improvements. The land use map designation change supports the City's vision as a leader in regional economic, land use and urban design challenges.

The proposed Land Use Map designation change is consistent with current Comprehensive Plan policies, including:

- LU Policy-1.1 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.

- LU Policy-21. Support development of compact, livable and walkable mixed use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
- LU Policy-22. Monitor trends in Bellevue's job centers and consider land use changes, if needed, to maintain the vitality of these centers.
- LU Policy-23.Provide a diversity of commercial areas outside the Downtown to provide an array of business and development opportunities to serve other parts of the community.
- ED Policy-21. Support economic development in the city's commercial areas.
- ED Policy-23. Emphasize the value of a range of commercial centers to provide opportunities for a diverse range of businesses.
- ED Policy-27: When a commercial revitalization effort involves significant changes to plans and regulations that may impact a residential neighborhood, develop strategies to avoid or minimize those impacts.
- S-EG Policy-3: Encourage office and retail land uses that take advantage of freeway access, transit service, and non-motorized transportation alternatives without adversely impacting residential neighborhoods.
- S-EG Policy-4: Encourage the integration of restaurants and other commercial uses that serve local workers into and adjacent to office development to enhance the mix of uses within walking distance of employment areas.
- S-EG Policy-14: Improve safety, convenience, and access by ensuring that internal circulation systems are integrated with the street system to improve multi-modal mobility within and between developments.
- S-EG Policy-17: Improve connectivity within the subarea for pedestrians and bicycles where opportunities exist by integrating land uses, improving road way safety for all modes of travel, and linking commercial, office, parks, and public spaces with trails and pathways.
- S-EG Policy-28: Create community character in commercial, office, and mixed use development through the use of standards and incentives that support public art, street lighting, landscaping, distinctive building treatments and pedestrian-oriented site design.
- S-EG Policy-31: Create and encourage an interconnected system of non-motorized trails as a part of public and private development within the subarea that will link community amenities, provide recreational opportunities and offer transportation benefits.

The proposed Land Use Map designation change supports the City's Comprehensive Plan vision and Eastgate Subarea policies to concentrate growth in urban nodes. The proposed Land Use Map designation change will help the City meet its growth and employment targets.

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). 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 proposed Land Use Map designation presents a site-specific Comprehensive Plan amendment to the City's Land Use and Eastgate Subarea Elements. The proposed Land Use Map designation change is most appropriately addressed through the annual Comprehensive Plan updates.

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 City most recently adopted Comprehensive Plan text and map amendments relative to the Eastgate subarea on August 3, 2015 however no changes were made specifically to the Eastgate Office Park property or its Land Use Map designation. It appears that the Property's land use map designation has remained unchanged since 2006 at the latest. Prior to that, the City's previous major update of the Eastgate Subarea policies and land use designations was in 1990. The proposed Land Use Map designation change is in compliance with the City's three-year limitation rules.

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 Land Use Map designation change is in compliance with the City's three-year limitation rules. It does not raise policy or land use issues that are more appropriately address by an ongoing work program approved by the City Council. The proposal is most appropriate for the Comprehensive Plan update work program as a site-specific land use map designation change.

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

The proposed Land Use Map designation change presents a site-specific land use map designation. The proposed amendment comports with the Growth Management Act mandate for annual review of the City's land use plan. RCW 36.70A.130. The proposed amendment can be reasonably reviewed within the resources and time frame of the annual amendment work program.

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

The City most recently adopted Comprehensive Plan text and map amendments relative to the Eastgate subarea on August 3, 2015 however no changes were made specifically to the Eastgate Office Park property or its Land Use Map designation. It appears that the Property's land use map designation has remained unchanged since 2006 at the latest. Prior to that, the City's previous major update of the Eastgate Subarea policies and respective land use designations was in 1990.

This Property has been designated office for, at the least, over a decade. The Property was within the Eastgate/I-90 study area, however, it was overlooked. The Proposal addresses significantly changed conditions because the Eastgate/I-90 planning process did not include a real evaluation of this Property due to an assumption that the Property was not a viable redevelopment site. While we recognize the assumption, it is incorrect. The City's reliance on an improvement to land ratio failed to accurately reflect the market conditions at the Property due to the existing structure's age and the potential for moderate redevelopment of the suburban site. Thus, the City's planning assumptions were incorrect. Overlooking the Property will be a missed opportunity for moderate infill density.

Current market conditions support the Property's viability for successful, moderate redevelopment. This is a significant changed condition since the Eastgate/I-90 evaluation which formed the basis

for the Subarea Planning policy development (and omitted serious mention of this Property). The Property is an eligible candidate for moderate redevelopment. The surrounding development to the west, south and east of the Property is positioned to implement the City's vision. The City's omission of the Property from the City's planning presents a missed opportunity to encourage redevelopment that provides connections with the existing Robinswood Park through public and private non-motorized trails. The City is currently evaluating development standards for the OLB designation that provide additional flexibility and public benefit criteria for development within the subarea. As a result, the Proposal will better align the Property with the City's current vision.

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

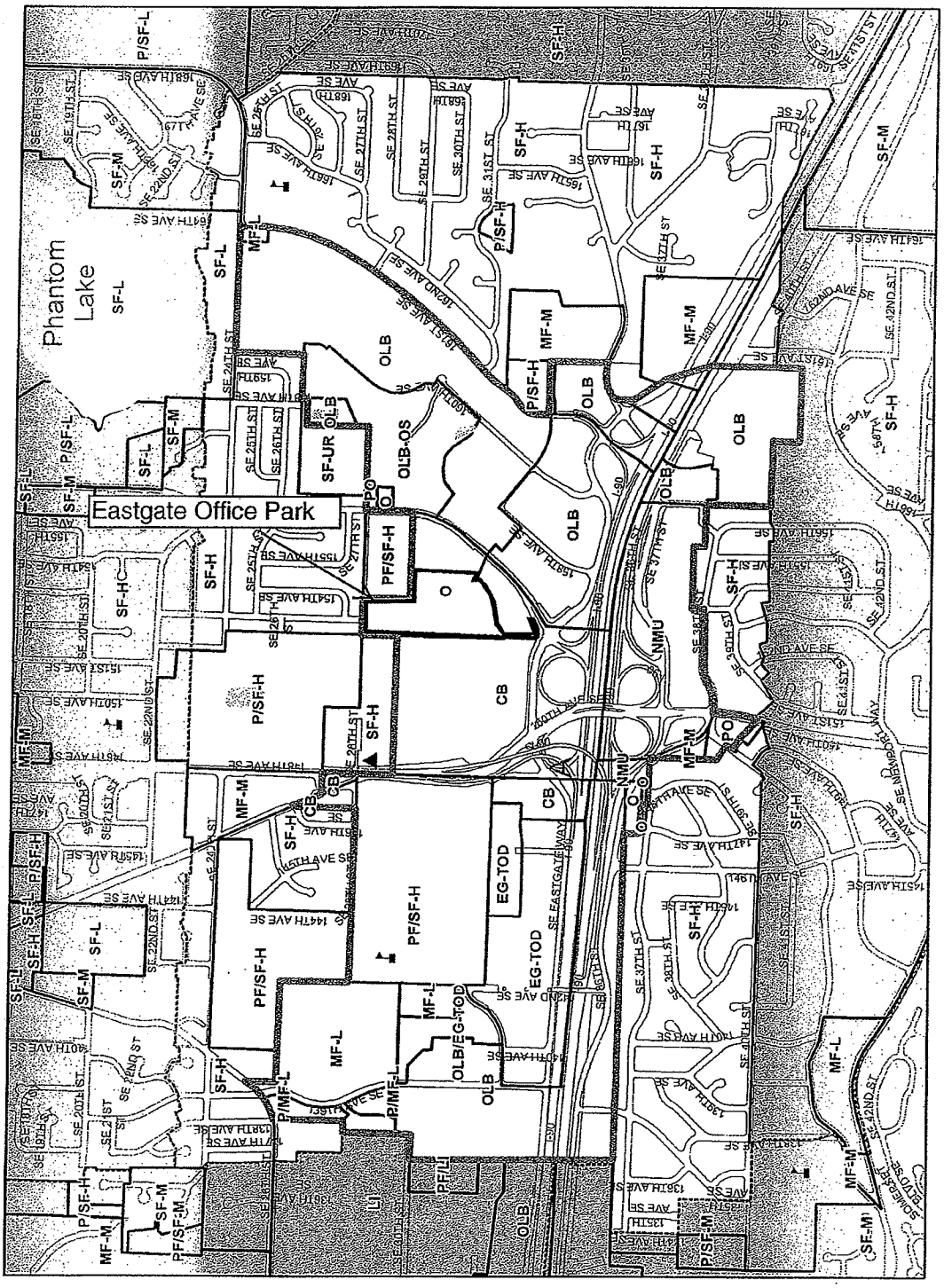
N/A.

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

The proposed Land Use Map designation change is consistent with the Growth Management Act ("GMA") and King County Countywide Planning Policies ("CPP"). The GMA encourages innovative land use management techniques (RCW 36.70A.090) and encourages growth within urban growth areas (RCW 36.70A.110). Centrally located development, including potential density increases and flexibility in uses in urban commercial areas served by regional transit, is consistent with the GMA. The Land Use Map designation change is also consistent with the County CPPs.

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

N/A.



Eastgate Land Use Plan

N

SF	Single Family	PO	Professional Office	GC	General Commercial
MF	Multi Family	O	Office	LI	Light Industrial
-L	Low Density	OLB	Office, Limited Business	PF	Public Facility
-M	Medium Density	OLB-OS	Office, Open Space	P	Park
-H	High Density	NB	Neighborhood Business	NMU	Neighborhood Mixed Use
-UR	Urban Residential	CB	Community Business	EG-TOD	Eastgate-Transit Oriented Development
				OLB/EG-TOD	OLB and Eastgate-Transit Oriented Development

- Fire Stations
- Public Schools
- Planning Districts
- Bellevue City Limits (20
- Lakes
- Outside of Bellevue

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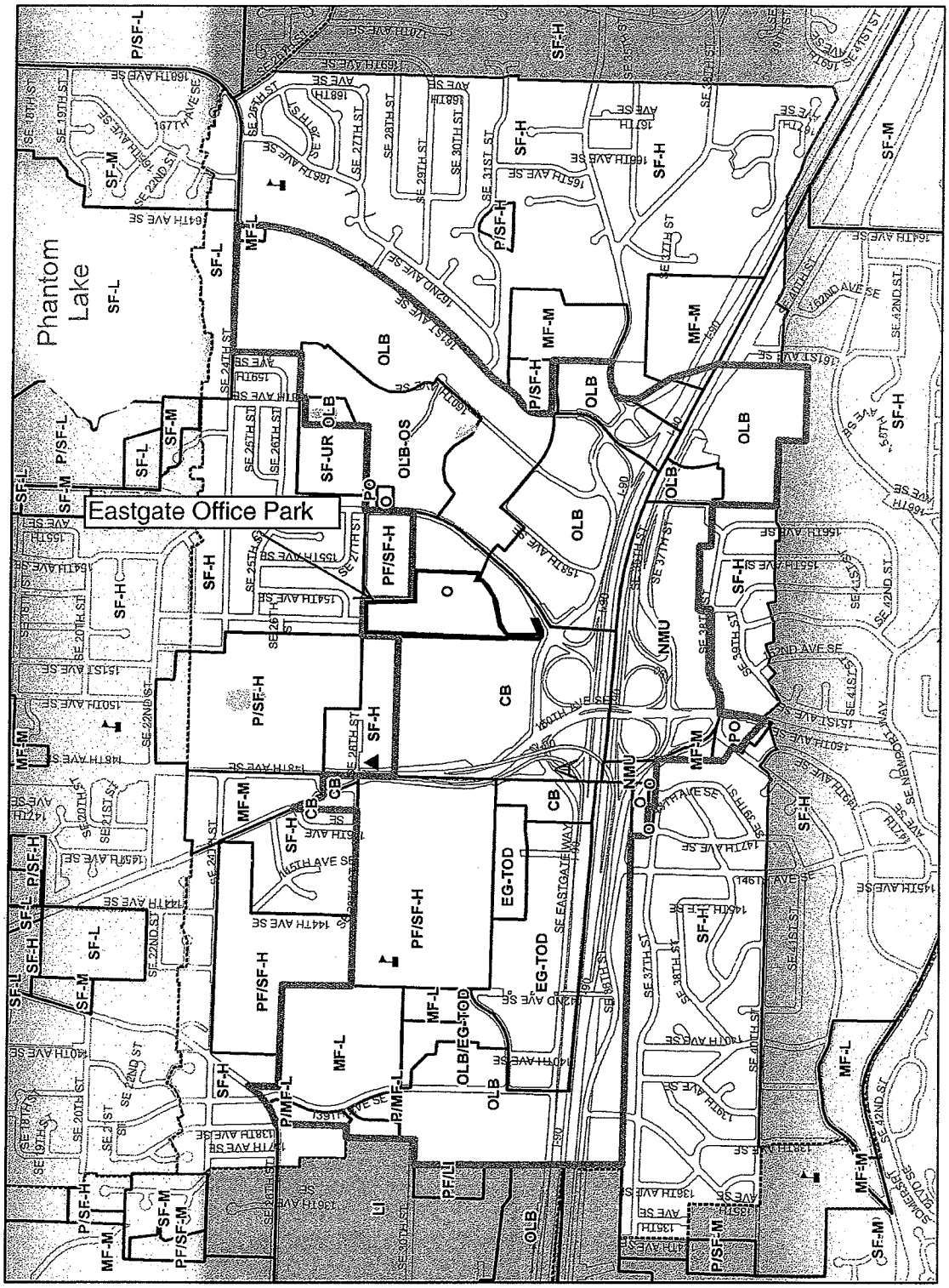

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-UR	Urban Residential	CB	Community Business	EG-TOD	Eastgate-Transit Oriented Development
				OLB/EG-TOD	OLB and Eastgate-Transit Oriented Development

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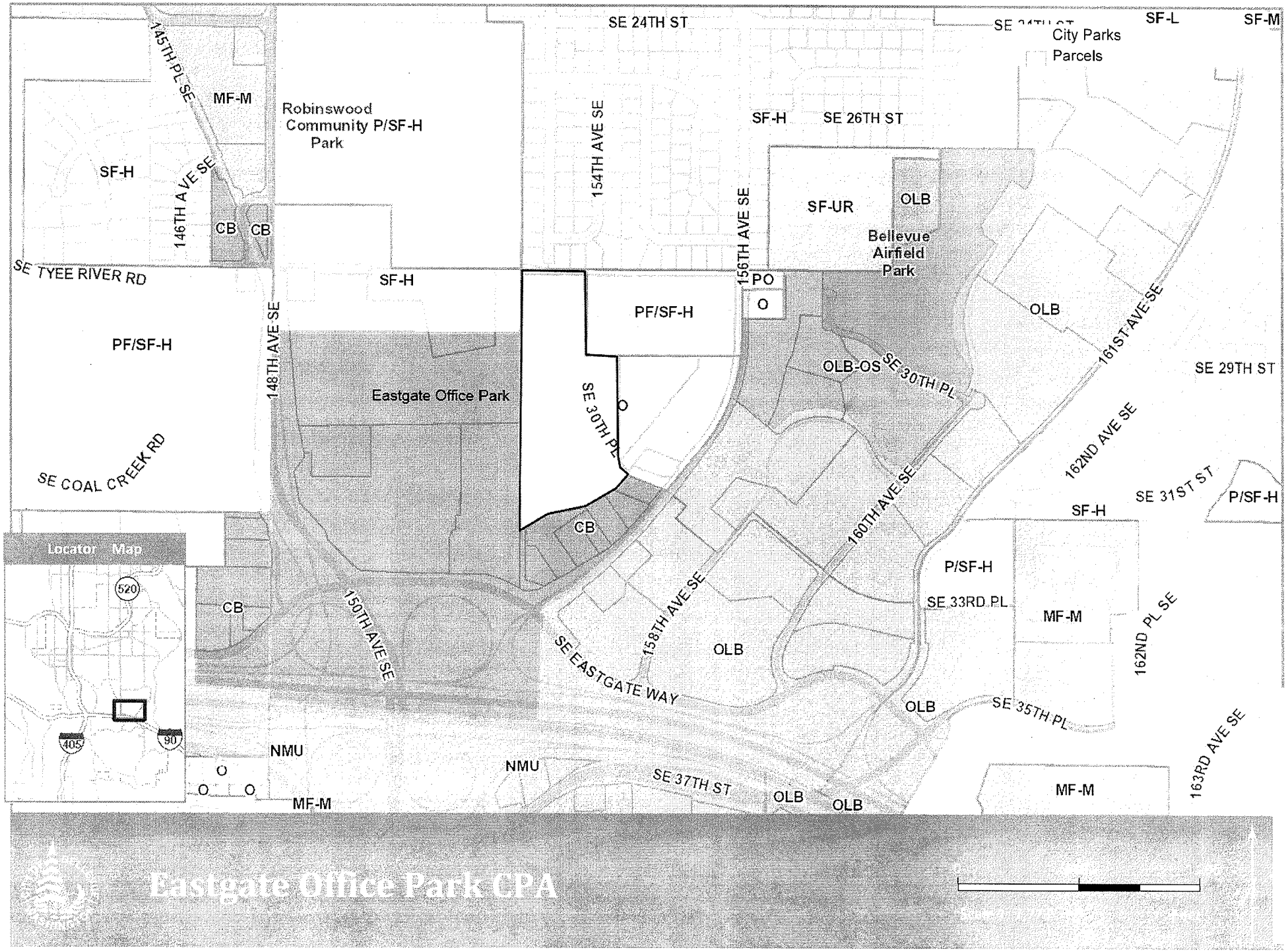

ATTACHMENT 2

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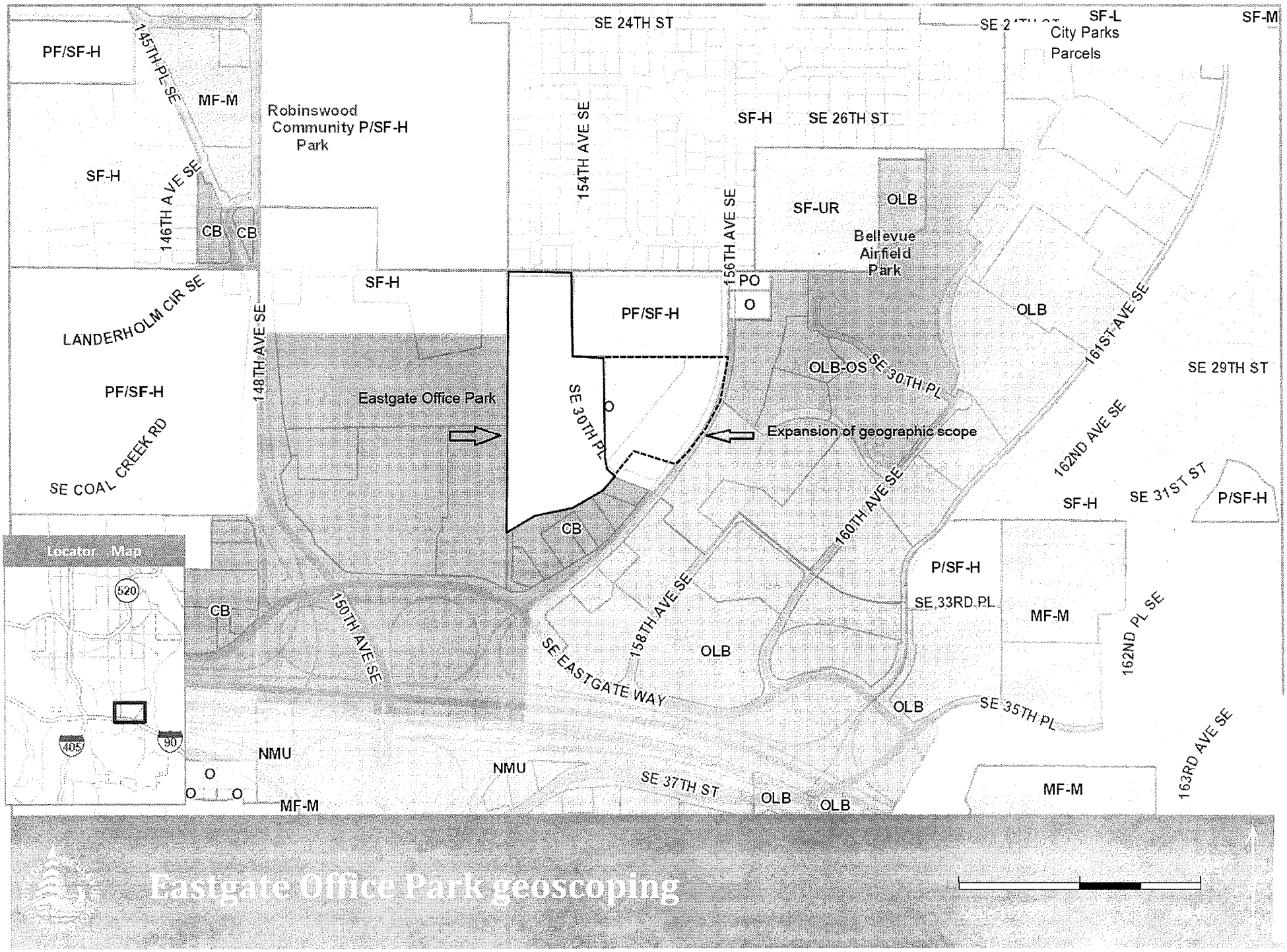

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ATTACHMENT 3

ATTACHMENT 4

WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

Caring for
your natural resources
... now and forever

May 6, 2016

Nicholas K. Matz, AICP, Senior Planner
Department of Planning & Community Development
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

Re: Bellevue Comprehensive Plan Amendment Process

Dear Mr. Matz,

The Department of Natural Resources (DNR) is in receipt of your letter dated, April 14, 2016, advising us of a request to change the Comp Plan designation on a neighboring property to the west of our ownership (generally described as Lots 2 and 3 of CC&F I-90 Bellevue Business Park, Division 2). The proposed change is from the existing Office designation to Office-Limited Business.

As your letter further suggests, our property is very similar in characteristics as that of the proponent, thus, should be considered for the same potential change in designation. As such, please accept this letter as DNR's formal request to be a part of the City's Comp Plan Amendment Process for this specific area of the greater Eastgate Business Center.

Please advise as to next steps in the process, and if you require additional information from DNR. I can be reached directly at 360-902-1059 or richard.scrivner@dnr.wa.gov.

Sincerely,

Richard K. Scrivner
Planning Manager