

City of



## Bellevue Memorandum

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DATE: May 25, 2017

TO: Chair deVadoss and Planning Commission Members

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SUBJECT: Availability of Threshold Review Public Hearing Staff Recommendation:  
2017 Annual Comprehensive Plan Amendments (CPAs)

*The Comprehensive Plan is a document which guides the nature and intensity of development in the City. An amendment to the Plan is a mechanism by which the City may modify its land use, development or growth policies.*

**-LUC 20.30I.120 - Purpose.**

Enclosed please find the 2017 Annual Threshold Review CPA Recommendation and Consideration of Geographic Scoping Staff Recommendation for the Crossroads Subarea/ Bellevue Technology Center site-specific amendment (17-104627 AC). The staff recommendation is being issued together with notice of the Planning Commission's June 14, 2017 Threshold Review Public Hearing at Bellevue City Hall, starting at 6:30 pm.

2017 Annual Threshold Review CPA 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 CPA in the 2017 annual CPA work program. If included, *do not expand* the geographic scope of the proposal.

**Application Number:** 17-104627 AC

**Subarea:** Crossroads

**Original Addresses:** 2010 156<sup>th</sup> Ave NE, 15805 NE 24<sup>th</sup> St, 15800 Northup Way

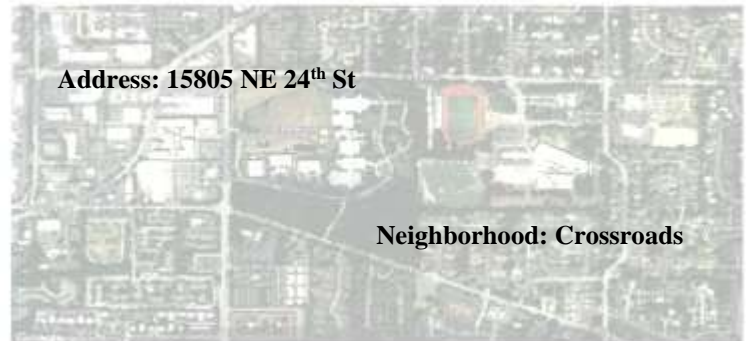
**Applicants:** KBS SOR 156<sup>th</sup> Ave NE LLC

**PROPOSAL**

Threshold Review is the first step in Bellevue's two-part plan amendment review process. Its purpose is to determine the amendments that should be included in the annual Comprehensive Plan Amendment (CPA) work program and move forward for full evaluation.

**Crossroads Subarea/Bellevue Technology Center CPA**

This [privately-initiated application](#) would propose new policies in the General Land Use, Economics and Transportation sections of the Crossroads Subarea Plan; amend existing Policies S-CR-16, S-CR-22, S-CR-26, S-CR-63 and S-CR-66; and amend Figure S-CR.1 accordingly in order to enable redevelopment of the Bellevue Technology Center site.



*Crossroads Subarea - BTC orthographic view*

**OVERVIEW OF STAFF RECOMMENDATION**

Staff recommends *not including* this CPA application in the 2017 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 have not been met:

*20.30I.140.E. The proposal does not address 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.*

The City-wide Comprehensive Plan update was adopted by the City Council in 2015. It lays out the City's overall growth strategy, specifically in the Land Use, Economic Development, and Neighborhood Elements. Placing more 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.

*20.30I.140.G. The proposed amendment is inconsistent 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;*

The proposal for increased commercial density 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."

[Map LU-4. Mixed Use Centers](#)



While the eastern edge of BelRed includes a portion of a high density node along 156<sup>th</sup> Ave. NE across from the subject site, a clear dividing line is established along the center of 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 156<sup>th</sup> Ave NE and Bel-Red Road NE provide for commercial development at an appropriate transitional scale with residential neighborhoods to the east and south.

## 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 stand 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 buildings on 46 acres.

### 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. Department of Planning and Community Development staff has concluded that the proposal *not be included* in the annual CPA work program.

Threshold Review Decision Criteria	Meets/ <i>Does Not Meet</i>
A – Appropriately addressed through Plan	Meets
B – Compliance with three-year limit	Meets
C – Does not raise policy issues outside CPA	Meets
D – Reasonably reviewed with resources	Meets
E – Addresses significantly changed conditions	<i>Does Not Meet</i>
F – Expand Geographic Scope	Meets
G – Consistent with current general Plan policies	<i>Does Not Meet</i>

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 such a matter. The 2014 CPA Threshold Review process for this site questioned whether amending the existing Planned Unit Development (PUD) through a rezone process should not have been pursued prior to addressing appropriate Comprehensive Plan land use designations. The applicant did so in 2015-2016. City staff reviewing the proposed rezone concluded that the PUD could not be amended without clarification of underlying policy, and the applicant withdrew the rezone.

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

The proposed amendment is in compliance. The 2014 CPA application was withdrawn by the applicant before the City Council would have taken action on including it in the annual work program. The LUC measures the three year rule by calendar, so a 2017 application would have been in compliance.

- 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*

Although the BTC site is the scene of a 51-year tug of war between its various owners and surrounding residential and business communities the proposed amendment does not raise policy or land use issues more appropriately addressed in an ongoing work program outside of the CPA process. Deciding where lines are drawn has citywide ramifications but the city

continues to effectively use the plan amendment process to address geographic proximity and transition uses.

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

Although the proposed amendment would be subject to the heightened scrutiny of a Bellevue-Kirkland-Redmond (BKR) model run in Final Review—scrutiny not usually associated with CPAs—city staff have concluded that it can reasonably be reviewed within the resources and timeframe of the annual CPA work program.

The proposal is a site-specific CPA at the Bellevue Technology Center, a 46-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. 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 BKR modeling assumptions.

- E. The proposal does not address 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 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 application does not demonstrate significantly changed conditions on the site or its surrounding area. The City-wide Comprehensive Plan update was adopted by the City Council in 2015. It lays out the City's overall growth strategy, specifically in the Land Use, Economic Development, and Neighborhood Elements. Placing more 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.

The passage of time is also not a significantly changed condition. The Crossroads Subarea Plan remains effective, in part because 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 special conditions on the office use continue to be appropriate, despite the passage of time.

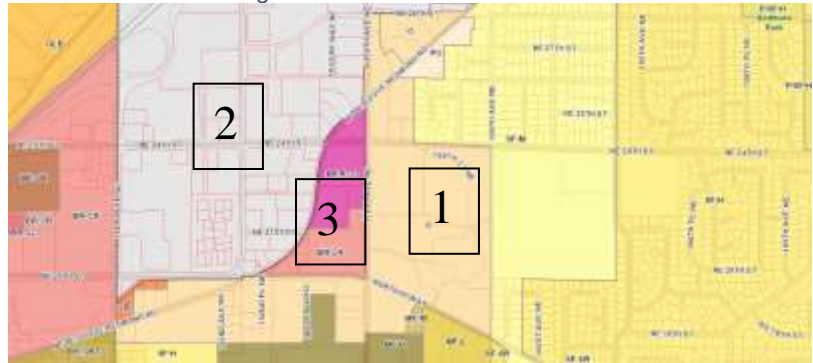
- F. *When expansion of the geographic scope of an amendment proposal is being considered, shared characteristics with nearby, similarly-situated property have been identified and the expansion is the minimum necessary to include properties with those shared characteristics; and*

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

Office-designated areas in north Crossroads



characteristics, the other properties lack the shared characteristic of the BTC site’s size.

The proposed CPA could not be expanded to these other sites and still provide a potential increased density benefit.

- 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 increased commercial density 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.”

While the eastern edge of BelRed includes a portion of a high density node along 156<sup>th</sup> Ave. NE across from the subject site, a clear dividing line is established along the center of 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 156<sup>th</sup> Ave NE and Bel-Red Road NE provide for commercial development at an appropriate transitional scale with residential neighborhoods to the east and south.

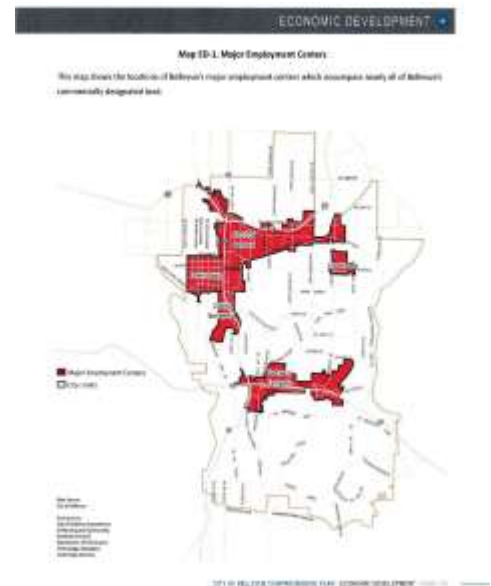
By virtue of its Office zoning the site is located in the City’s SR-520/BelRed major employment center (Map ED-1.) The applicant suggests this location, outside of the City’s mixed use center designations (Map LU-4) “...presents a significant, catalyst opportunity to support the City’s land use and economic development goals, including targeted support, recruitment and investment in the information technology cluster.” The applicant also

suggests that the site's proximity to existing and proposed transit infrastructure, it's location within an identified transit oriented development (TOD) ½-mile walkshed, the site's current level of development, and the age of Crossroads Subarea Plan policies guiding growth would position the proposed amendments to "...better align the 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 while still preserving the site's park-like character."

- **LU-13** Support neighborhood efforts to maintain and enhance their character and appearance.

[Map ED-1. Major Employment Centers](#)

- **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 CPA 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:*

*G. 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 2017 annual CPAs were introduced to the Planning Commission with a March 1, 2017 management brief. The Crossroads Subarea/BTC application was introduced to the Commission during an April 26, 2017, study session. Notice of the Application was published in the Weekly Permit Bulletin on February 23, 2017, and mailed and posted as required by LUC 20.35.420. Notice of the June 14, 2017, Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on May 25, 2017, and included notice sent to parties of record. Owners and residents within the 500-foot noticing perimeter of the site receive official notice, as do people signed up to receive such notices.

89 public comments or inquiries from 77 parties of record have been submitted on this application to date (May 23.) An online petition has garnered 290 names. A comment letter analyzing the application at length was signed by representatives of ten Neighborhood Associations. The applicant sent in comments on a public meeting and transportation analyses. Due to the large volume received the comments are available online, as is a link to the petition.

98 percent of the comments expressed 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 156<sup>th</sup> is a boundary and that neighbors adjacent to Redmond's Overlake 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.

Regardless, both the applicant and residents and communities, as well as parties of record, have engaged in proactive and respectful public participation. It is worth noting that comments have come not only from individuals and community associations, but also from multiple communities reaching out to each other.



Early and continuous community engagement has been robust and transparent, and includes:

- Early outreach to previous (2014) parties of record
- Responding in writing to each public comment submitted
- Expanded web page material at Comprehensive Plan Amendments with expanded information, the docket list, and scheduled timelines
- “Invite us” invitations by Planning and Community Development planning and neighborhood liaison staff to neighborhood and community associations to discuss the 2017 Comprehensive Plan application/process
- Early management brief to Planning Commission on the 2017 Comprehensive Plan application/process
- Applicant-hosted information meeting on the BTC site
- “Drop-in” office hours by Planning staff at Crossroads Mini City Hall on April 17 and May 10, 2017
- Official Weekly Permit Bulletin notice as required

#### **ATTACHMENTS**

1. Application materials
2. Site map

# Attachment 1



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

## Application for COMPREHENSIVE PLAN AMENDMENT

CPA YEAR 2017 APPLICATION DATE: <u>1/31/17</u>	TECH INITIALS <u>WJ</u>	AMANDA PROJECT FILE: <u>17-1041027 AC</u>
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1. Project name Crossroads Subarea/Bellevue Technology Center Amendments
2. Applicant name KBS SOR 156th Avenue Northeast, LLC Agent name Mark Jackson
3. Applicant address 10900 NE 8th Street, Suite 225 Bellevue, WA 98004
4. Applicant telephone (206) 737-4321 fax (    )      e-mail mark.jackson@transwestern.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

Proposed amendment to change the map designation from existing N/A to proposed N/A

Site area (in acres or square feet) 46 acres

Subarea name Crossroads

Last date the Comprehensive Plan designation was considered      /      / 88

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):

Crossroads Subarea.

Last date the Comprehensive Plan policy or text was considered      /      / 88

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 20.301.140 (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 Rezoning 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 1/30/17

*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 1/30/17  
(Owner or Owner's Agent)

## City of Bellevue Comprehensive Plan Amendment Application Addendum

Bellevue Technology Center

City File No. 17-104627 AC

January 31, 2017 – UPDATED April 18, 2017

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

The Comprehensive Plan Amendment (“Proposal”) is a series of text amendments related to a 46-acre Office designated property at 156<sup>th</sup> Avenue NE and NE 24<sup>th</sup> Street in the Crossroads Subarea.

**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
Crossroads Subarea		
	New CR Policy (Land Use)	<u>Encourage innovative, infill transit-oriented development opportunities for the office area east of 156<sup>th</sup> Avenue NE between Northup Way and NE 24<sup>th</sup> Street (known as Bellevue Technology Center) that promote multi-modal transit usage, preservation of open space, trees and the park-like character.</u>
	New CR Policy (Economics)	<u>Strengthen and encourage the economic vitality within the office area east of 156<sup>th</sup> Avenue NE between Northup Way and NE 24<sup>th</sup> Street through the implementation of infill, transit-oriented development projects and other land use techniques.</u>
	New CR Policy (Transportation) [Updated 4/17]	<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>
	S-CR-16	Encourage the city to purchase land <u>or support conservation easements or other public-private partnership opportunities</u> for parks and open space if appropriate land becomes available.
	S-CR-22 [Updated 4/17]	Implement the recommended improvements for facilities as identified in the Transportation Facilities Plan. <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>

	S-CR-26 [Updated 4/17]	Encourage neighborhood stability by providing transportation mitigation measures when improving the regional system. <u>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>
	S-CR-63	Multifamily use is not allowed within District B, <u>except as authorized in S-CR-66 for the area bounded by NE 24<sup>th</sup> Street and Northup Way (known as the Bellevue Technology Center).</u> Existing multifamily uses within District B can be converted to senior housing, senior congregate care, assisted living and nursing homes.  [Discussion omitted]
	S-CR-66	<u>Office use as a conditional use is appropriate for the property east of 156<sup>th</sup> Avenue NE between Northup Way and NE 24<sup>th</sup> Street (commonly known as Unigard).</u>  <i>Discussion: This area is should be developed under a conditional use permit with attention given to retaining large stand of trees, views through the site from adjacent streets and the open character of the site.</i>  <u>Provide for transit-oriented development opportunities for multi-family housing, senior housing and office, with an emphasis on the information technology and business services target clusters, within the area bounded by NE 24<sup>th</sup> Street and Northup Way (known as the Bellevue Technology Center), and with FARs and heights that are not to exceed the standards of the Office designation that are applicable City-wide, except that heights along those areas directly adjacent to Interlake High School may reach up to 70 feet. Support land use changes to encourage moderate, transit-oriented infill office and residential densities that leverages the adjacent bus-rapid transit assets and the 1/2 mile proximity to future Overlake Village light rail station.</u>  <i>Discussion: This area is envisioned for moderate transit-oriented development which may be achieved through a development agreement or other land use approval mechanisms. Future transit-oriented development should give attention to the northwest "meadow" area, including exploring the potential using conservation easements or other public-private partnership opportunities to ensure preservation and provide public access, preservation of the existing stands of trees and the park-like character.</i>

	Figure S-CR.1	Amend to make consistent with new S-CR-63 and S-CR-66.
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**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 2015, the City adopted a major update to the Comprehensive Plan. The updated Comprehensive Plan identified the Bellevue Technology Center as located within one of Bellevue’s five major employment centers. *Attachment A, p. 2-3* (Map ED-1). The Bellevue Technology Center is located at 156<sup>th</sup> Avenue NE and NE 24<sup>th</sup> Street at the edge of the Bel-Red subarea and just south of Microsoft’s global headquarters in Redmond. *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 Bellevue Technology Center is also strategically located among key transit infrastructure. *Attachment A, 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 152<sup>nd</sup> Avenue NE opening in 2023.

In the 2015, update, the City reiterated its commitment to providing a diversity of commercial areas outside Downtown to provide an array of business and development opportunities and to serve other parts of the community (LU-23). Over the last five years, 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 hub. Given the proximity to major transit infrastructure, including the adjacent “B” Line bus rapid transit and future light rail within a ½ mile walkshed, the Bellevue Technology Center presents an excellent opportunity to implement the Puget Sound Regional Council’s Growing Transit Communities Compact (“Compact”) strategies for transit-oriented development around major transit infrastructure. The City signed the Compact in 2014.

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 at a 0.16 floor area ratio (FAR), which stems from pre-Growth Management Act subarea plan policies and concomitant zoning agreements first made in the 1970s that limit the opportunity for moderate infill growth. In fact, the City has not reviewed some of these Subarea policies since 1988.

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 while still preserving the Property’s park-like character. Indeed, 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 and multi-parcel developments and large institutions 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.
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</u>



	<u>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:

<b>Comprehensive Plan</b>	<b>Policy Language</b>
LU Policy-1	Promote a clear strategy for focusing the city’s growth and development as follows: 1. Direct most of the city’s growth to the Downtown regional growth center and to other areas designated for compact, mixed use development served by a full range of transportation options. 2. Enhance the health and vitality of existing single family and multifamily 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"> <li>1. Transit may support more intense development around some stations;</li> <li>2. Transit supportive design and orientation may be implemented without changes to land use intensity; and</li> <li>3. Land use plan map changes would be precluded in existing single family designations and environmentally sensitive areas</li> </ol>
TR Policy-13	Promote use of mobility options by requiring new development to incorporate design features such as: <ol style="list-style-type: none"> <li>1. Preferential parking for carpools and vanpools;</li> <li>2. Special loading and unloading facilities for carpools and vanpools;</li> </ol>

	<ul style="list-style-type: none"> <li>3. Transit passenger facilities, including comfortable bus stops and waiting areas that may be integrated in the building design; and</li> <li>4. Secure and covered bicycle parking, showers, lockers, and related facilities to support bicycle commuters</li> </ul>
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 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 Comprehensive Plan text amendments to the Crossroads Subarea Element. 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 Crossroads Subarea plan was most recently amended in 2007 to address planning efforts involving revitalizing the Crossroads Mall; however, the pertinent policies addressed by the Proposal were most recently amended in 1988. 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. As noted above, the City has ceased its policy of regular Subarea Element updates. Though the City Council has indicated in the past that a future evaluation of the City's Subarea Element review policy may be forthcoming, the outcome of any future Subarea Element policy is unknown. Due to this uncertainty, and the potential two plus year lag time to reinitiating programmatic Subarea Element review, the Proposal is most appropriate for the 2017 review cycle.

*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 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 key Subarea Plan policies at issue were last amended in 1988, nearly thirty years ago. 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:

- Emergence of Information Technology and Business Services Cluster. The City last addressed these key policies in 1988. At that time, Microsoft had just recently moved to its Redmond global headquarters just north of the Property. Understandably, the 1988 Subarea Plan does not reflect emerging global information technology cluster. Indeed, the Bellevue Technology Center was developed as an owner-occupied campus for an insurance company.

The City's Economic Development Plan, adopted in 2014 by the City Council, recognizes that information technology and business services are key economic drivers for the City.

Since 1988, the employment patterns and densities in Crossroads and the vicinity have transformed dramatically. 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 4, p. 3*. More recently, the City has envisioned Bel-Red to the west as an employment hub and Redmond approved a 1.2M square foot office complex with a hotel/conference center within ½ mile of the Property. Today, information technology is the City's largest target employment cluster with over 25,000 employees. These conditions did not exist when the City last addressed these Crossroads Subarea policies. Since the prior owner sold the Bellevue Technology Center in 2012, Bellevue Technology Center has become global headquarters to one of Washington's fastest growing private companies and numerous information technology businesses, including Hitachi and Interger. 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, within Crossroads and its proximity since the adoption of S-CR 66 is a significantly changed condition that warrants further evaluation to ensure that the City's land use and economic development policies remain consistent.

- Establishment of Rapid Ride Bus Rapid Transit "B" Line on NE 24<sup>th</sup> Street Adjacent to the Property. The addition of bus-rapid transit adjacent to Bellevue Technology Center requires of the City's policies in relation to supporting transit-oriented development, land use and economic development priorities that have not be revisited for this Crossroads Property since 1988. 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 walkshed to provide opportunities to expand employment growth in key target clusters through infill office development that leverages the proximity to Redmond 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 City's current Crossroads Subarea policies, particularly S-CR-66 which was last amended in 1988.



- 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 156<sup>th</sup> 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 A, 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. Moreover, the City has never evaluated the consistency of S-CR-66 with the City's current transportation policies. 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.

According to the *Seattle Times*, since 2010, the Crossroads neighborhood had experienced the largest increase in transit ridership in the Puget Sound region. This increased Crossroads neighborhood transit ridership is an additional significantly changed conditions that was not anticipated by these 1988-era Crossroads Subarea policies that warrants policy-level review, particularly in the light of the City's adopted 2014 Economic Development Plan policies to leverage the planned Eastlink light rail corridor and promote transit-oriented development.

- Compliance with Growth Management Act. The City adopted S-CR-66 prior to the adoption of the Growth Management Act. Since then, the City has adopted Growth Management Act-compliant development regulations and review procedures. The continuation of such pre-GMA policies are a significantly changed condition that merits policy-level review.

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.



