



# MEMORANDUM

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DATE: December 28, 2006

TO: Chair Mathews  
Bellevue Planning Commission  
CPA applicants

FROM: Paul Inghram AICP, Comprehensive Planning Manager 452-6866  
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SUBJECT: 2006 Annual Comprehensive Plan Amendments (CPA)

Enclosed please find the staff reports and recommendations for the 2006 annual Comprehensive Plan Amendment Work Program. These documents are made available upon publishing of the public hearing notice, and are provided as a courtesy to you.

On January 17, 2006 the Planning Commission will hold public hearings and make recommendations on the 2006 Comprehensive Plan Amendments. The 2006 annual CPA Work Program consists of four privately-initiated site-specific CPAs:

- Wilburton-Gateway
- Public (formerly Shurgard) Storage
- Hancock/Muren
- Bellewood Apartments

and two non site-specific (policy) CPAs”

- Crossroads Center Plan
- Wilburton/NE 8<sup>th</sup> St. Corridor Study



DATE: December 28, 2006

TO: Chair Mathews  
Bellevue Planning Commission

FROM: Nicholas Matz AICP, Senior Planner, 452-5371  
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SUBJECT: Public (formerly Shurgard) Self Storage Comprehensive Plan Amendment (06-102653 AC) January 17, 2007 Public Hearing

## I. PROPOSAL

This privately-initiated Comprehensive Plan Amendment (CPA) proposes a Richards Valley Subarea Plan map change from OLB (Office Limited Business) to LI (Light Industrial) on 2.89 acres of property located at 1111 118<sup>th</sup> Ave SE. The proposal has also been geographically expanded to include an additional 4.5 acres of adjacent property at 1021 118<sup>th</sup> Ave SE and at 969 118<sup>th</sup> Ave SE. See Attachment 1.

If the zoning were to be changed from OLB to LI consistent with the proposed Comprehensive Plan Amendment, some of the changes to uses allowed would include:

- Most manufacturing uses would be permitted
- Bus terminals and maintenance garages would be permitted
- Off-site hazardous waste treatment and storage could be allowed as a Conditional Use
- Additional wholesale and retail uses would be permitted
- Building and repair services would be permitted
- Storage services would be permitted (making existing use of the original application area a conforming use)
- Medical offices would no longer be allowed
- Some government services would no longer be allowed
- Theaters and some recreation uses would no longer be allowed; others would change from requiring a conditional use to being permitted
- More resource use would be permitted

## II. STAFF RECOMMENDATION

This expanded proposal does not fully satisfy the Decision Criteria for a Comprehensive Plan Amendment (see Section III) and **staff recommends denial of the Comprehensive Plan Amendment to:**

- Change the Richards Valley Subarea Plan map from OLB (Office Limited Business) to LI (Light Industrial) on 2.89 acres of property located at 1111 118<sup>th</sup> Ave SE, and on an

additional 4.5 acres of adjacent property at 1021 118<sup>th</sup> Ave SE and at 969 118<sup>th</sup> Ave SE on properties referred to as the Public Storage (formerly Shurgard) Self Storage CPA.

The objective of the applicant to facilitate redevelopment and expansion of the existing storage use could be allowed under LUC 20.20.560(B) Nonconforming Uses, without a Comprehensive Plan amendment, provided that site and structure improvements will need to conform to the zone's dimensional standards.

### III. DECISION CRITERIA

The Decision Criteria for a Comprehensive Plan Amendment are set forth in the Land Use Code, Section 20.30I.150. Based on the criteria, Department of Planning and Community Development staff has concluded that the proposed amendment should be **denied** as proposed. This conclusion is based on the following analysis:

**A. There exists obvious technical error in the pertinent Comprehensive Plan provision, or**

Not applicable to this proposal.

**B1. The proposed amendment is consistent with the Comprehensive Plan and other goals and policies of the city, the Countywide Planning Policies (CPP), the Growth Management Act and other applicable law; and**

The proposed amendment is not fully consistent with the Comprehensive Plan and other goals and policies in these planning documents for urban growth development.

An LI designation for the subject properties would be consistent with the existing uses and may facilitate reinvestment of those uses consistent with the city's general intent of supporting commercial development. However, an LI designation for this proposed amendment would allow a broad range industrial redevelopment that could be counter to the direction historically contemplated by the Comprehensive Plan and inconsistent with the adjacent Mercer Slough shoreline designation and environmental sensitive.

#### **Comprehensive Plan**

The Land Use General Element of the Comprehensive Plan is the framework for policies which support commercial areas serving the city, identified in **Land Use Element Goal 3**.

**Richards Valley Subarea Plan** policies recognize that commercial and industrial uses exist alongside environmentally sensitive areas, and that a balance must be sought, especially for redeveloping uses:

- **POLICY S-RV-3:** Encourage commercial areas to develop with sensitivity to their surroundings.

- **POLICY S-RV-30:** Develop areas designated for light industrial uses with sensitivity to the natural constraints of the sites.

The **Goal** of the **Environmental Stewardship** section of the Environmental Element is to promote a sustainable urban environment by weighing environmental concerns in all decision-making processes. Those decision-making processes often involve redeveloping urban areas that have competing conditions and objectives, like this light industrial use with proximity to Mercer Slough. The Environmental Stewardship section thus describes an effective environmental stewardship strategy as one which focuses on regulations and programs that emphasize the protection of intact environmental functions.

- **POLICY EN-1:** Consider the immediate and long-range environmental impacts of policy and regulatory decisions and evaluate those impacts in the context of the city's commitment to provide for public safety, infrastructure, economic development, and a compact Urban Center in a sustainable environment.

The **Shoreline Management Program Element** additionally includes policies that direct development to be compatible with the natural attributes of Bellevue's shorelines, and in particular for Mercer Slough. The Shoreline Management Program Element also provides direction to avoid land uses that would be incompatible with the shoreline area.

- **POLICY SH-2.** Discourage short-term economic gain or convenience in development when potential, long-term adverse effects on the shoreline are possible.
- **POLICY SH-3.** Give priority to uses and activities which improve or are compatible with the natural amenities of the shorelines, provide public access, or depend on a shoreline location.
- **POLICY SH-8.** Discourage uses, activities, and development in the shoreline area that create offensive, unsafe, or unmitigatedly adverse impacts.
- **POLICY SH-18:** Inland Shoreline Areas: Preserve the open character of Mercer Slough.
- **POLICY SH-43:** Design roadways and improvements to existing roadways and parking areas within, or adjacent to, shoreline wetlands to minimize pollution from storm water runoff.

While the expansion of the storage use contemplated by the applicant may be designed in a manner that is consistent with the city's policies to protect the shoreline and Mercer Slough habitat, the broad range of uses supported by an LI designation could potentially expose the sensitive environment to impacts that cannot be fully mitigated or that could impact public use of the shoreline. For example, future LI uses could include outdoor industrial activities, use of hazardous substances, and excess noise.

## **Growth Management Act**

In its current form, the proposal is consistent with GMA Planning Goals of Urban Growth, Economic Development, and Reduce Sprawl. The proposal is not fully consistent with the goals of Environment and Shoreline Management.

The proposal is inapplicable to Transportation, Housing, Open Space and Recreation, Property Rights, Permits, Natural Resource Industries, Citizen Participation and Coordination, Public Facilities and Services, and Historic Preservation.

## **Countywide Planning Policies**

Countywide Planning Policies for King County are organized by topics in nine separate chapters. The framework policies in each chapter are implemented through local plans and regulations. Evidence of the consistency of the proposal with the framework policies is as follows:

- I. **Critical Areas** *Any new development would be required to adhere to the standards of the city's adopted critical areas regulations.*
- II. **Land Use Pattern** *The proposal is consistent with the implementation of the desired urban land use pattern, including reducing the consumption of land by concentrating development, and encouraging infill development by making efficient use of land in urban residential areas.*
- III. **Transportation** *The proposal will not affect the implementation of regional transportation systems. Proposed East Link Light Rail Alternatives to be included for EIS analysis include one potential light rail route to Downtown Bellevue (Alternative B7) along the BNSF right-of-way to 118th Street at a proposed station site in the vicinity of 118th Ave. SE and SE 8th St. The Public Storage/Shurgard site will be adjacent to this route and will be within a quarter mile of the proposed station location. However, this proposed amendment does not interfere with any proposed route or station locations under Segment B analysis.*
- IV. **Community Character and Open Space** *The proposal will not affect the implementation of regulations dealing with historic resources, urban design, human and community services, and open space lands and corridors.*
- V. **Affordable Housing** *This proposal will not affect the implementation of efforts to encourage affordable housing.*
- VI. **Contiguous and Orderly Development and Provision of Urban Services to Such Development** *Urban services are available for the site and the site is contiguous to developed areas.*

**VII. Siting Public Capital Facilities of a Countywide or Statewide Nature.**

*Not applicable to this proposal.*

**VIII. Economic Development** *The amendment would support redevelopment of the subject site.*

**IX. Regional Finance and Governance** *Not applicable to this proposal.*

**B2. The proposed amendment addresses the interests and changed needs of the entire city as identified in its long-range planning and policy documents; and**

The proposed amendment addresses interests and changed needs of the city. Since the early 1980s, and especially over the past decade, the density of urban areas has increased. In Bellevue, this is most notable in Downtown where the multifamily housing, commercial and office uses in dense, high rise developments continue to be built. As this urban development occurs the city will have an increased need for support facilities such as self storage, in proximity to Downtown.

However, an amendment to LI would support any of a range of LI uses as permitted in the Land Use Code. These potential uses range from industrial manufacturing uses, to subordinate wholesale and retail, to resource-based uses with external impacts such as noise, exhaust, and hazardous material handling. These categories of uses can have potential environmental impacts that are inconsistent with the city's interests of encouraging development that is compatible with the adjacent environmentally sensitive areas and shoreline associated with Mercer Slough.

**B3. 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 [below] for the definition of “significantly changed conditions;” and**

**Significantly changed conditions are defined as:** 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).*

The proposed amendment to change a portion of the Richards Valley Subarea Plan map from OLB to LI does not address significantly changed conditions. The OLB designation for the Public Storage/Shurgard site was adopted in the early 1980s as part of the larger Richards Valley Subarea Plan. The Subarea Plan has not been significantly changed since. In 1981, when the OLB designation was put in place, the Public Storage/Shurgard site and surrounding parcels contained LI uses (the general area west of 118th Ave SE, south of SE 8th Street). The long-range vision for these parcels at that time was a shift towards a development pattern similar to that in the Bellefield Office Park.

**B4. If a site-specific proposed amendment, the subject property is suitable for development in general conformance with adjacent land use and the surrounding development pattern, and with zoning standards under the potential zoning classifications; and**

While the uses that could be permitted under the potential LI zoning could have impacts that are inappropriate for surrounding area, as described above, expansion of the existing storage use could be suitable for the site. Although staff does not recommend the proposed Comprehensive Plan amendment, the Land Use Code could allow expansion of the existing use in general conformance with adjacent land use and the surrounding development pattern.

Land Use Code 20.50.560(B)(1) and (2) allow nonconforming uses to continue, provided that they are not abandoned for a period greater than twelve months. Expansion or redevelopment of the existing storage use could occur in accordance with Land Use Code 20.50.560(B)(3), where a nonconforming use may be expanded up to 20 percent or 20,000 square feet, whichever is less, through the Administrative Conditional Use process. Expansion may exceed 20 percent or 20,000 square feet through the Conditional Use process. The city may approve conditional uses if:

- The conditional use is consistent with the Comprehensive Plan; and
- The design is compatible with and responds to the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity; and
- The conditional use will be served by adequate public facilities including streets, fire protection, and utilities; and
- The conditional use will not be materially detrimental to uses or property in the immediate vicinity of the subject property; and
- The conditional use complies with the applicable requirements of this Code.

Site and structure improvements would need to conform to the zone's dimensional standards, depending on the extent of reconstruction proposed, or the Land Use Code's allowances for nonconforming structures and sites.

In this case, redevelopment of the site by expanding the existing nonconforming use consistent with LUC 20.50.560(B) would result in conformance with the code's dimensional and critical areas standards, including reduced impervious surface area, that could improve compatibility with adjacent lands and reduce environmental impacts.

Environmental considerations

The applicant's checklist notes Mercer Slough and adjacent wetlands are west of the site. Mapped critical areas show the western portions of the sites in this proposal are

within the Mercer Slough buffer, and wetlands are likely onsite. The presence of such areas could affect development capacity through redevelopment.

Development capacity

The following chart illustrates a basic capacity analysis using the Dimensional Requirements chart in the Land Use Code. This analysis does not illustrate any site-specific development proposals. The purpose of such basic analysis is to consider an upper threshold for impacts of traffic from land use density changes.

Potential gross square foot capacity is shown for existing and proposed Comprehensive Plan designations/zoning uses:

**Estimated Development Capacity** (gsf = gross square feet)

Existing Plan and capacity	Proposed Plan and capacity
OLB – 112,000 gsf office	LI – 161,000 gsf light industrial

Due to a lower density of employees per square foot, a fully developed site under the proposed Light Industrial designation would generate fewer pm peak trips than were the sites fully redeveloped under the existing OLB designation, and therefore would not trigger Traffic Standards Code mitigation requirements.

**B5. The proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare of the city.**

The application does not demonstrate that designating this site as Light Industrial would provide a clear public benefit or enhance the public health, safety and welfare of the city.

**IV. STATE ENVIRONMENTAL POLICY ACT**

The Environmental Coordinator for the City of Bellevue has determined that this proposal will not result in any probable, significant adverse environmental impacts. A final threshold Determination of Non-Significance (DNS) was issued on December 28, 2006.

**V. PUBLIC NOTICE AND COMMENT**

Notice of the Application was published in the Weekly Permit Bulletin and in the King County Journal on February 23, 2006. The Bellevue City Council initiated this CPA on July 17, 2006. The amendment proposal was presented to the Planning Commission during a study session on November 15, 2006. Notice of the Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin and in the King County Journal on December 28, 2006.

Pursuant to the requirements of the Growth Management Act, state agencies must be given 60 days to review and comment on proposed amendments to the Comprehensive Plan. A list of the site-specific 2006 Amendments to the Bellevue Comprehensive Plan was provided to state agencies on October 20, 2006 for review.

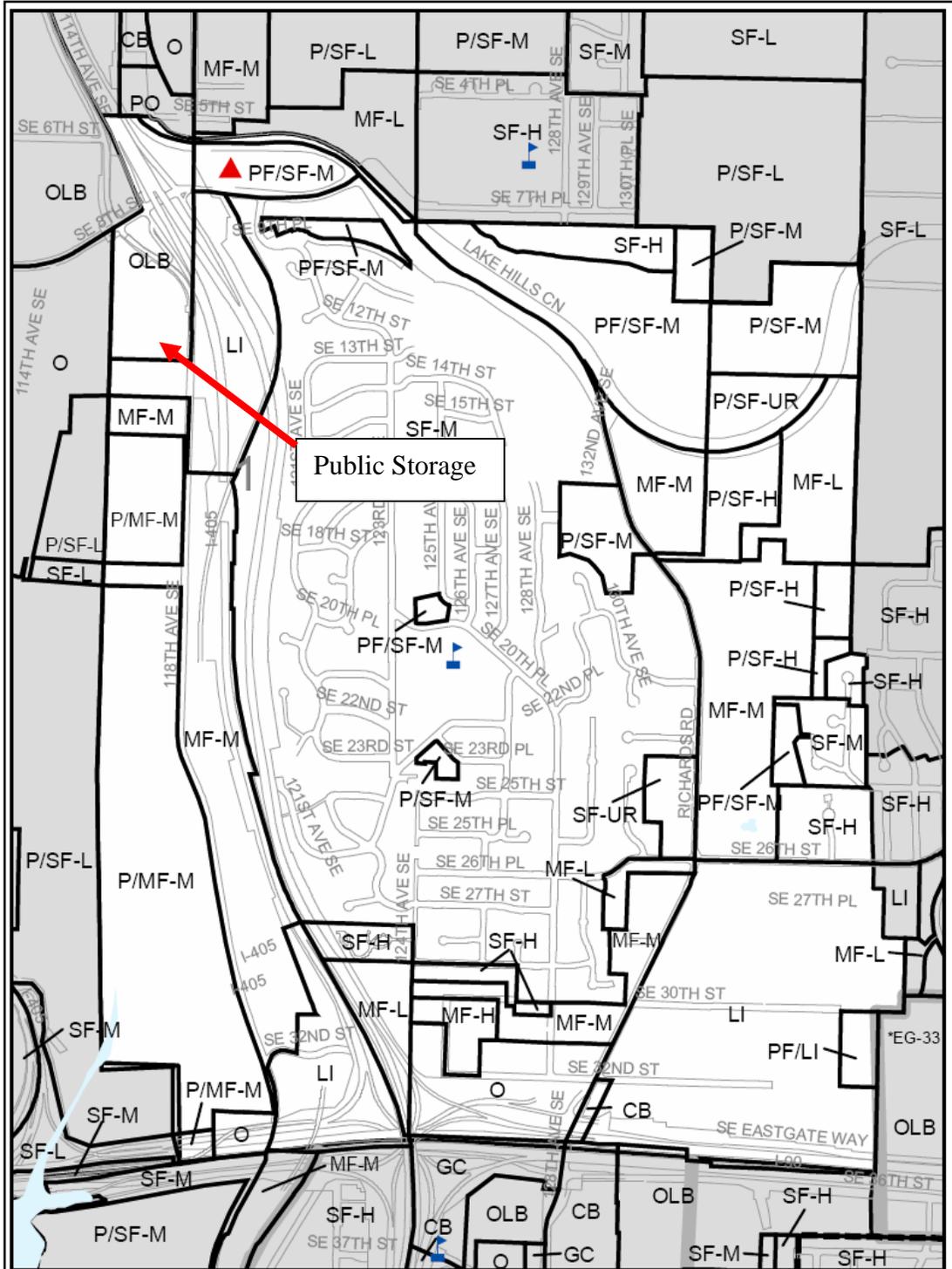
The city has discussed the staff recommendation with the applicant. The city has received no other telephone calls, emails or letters to date.

## **VI. NEXT STEPS**

**We request you conduct and close the public hearing, discuss the proposal, ask questions of staff, and make a recommendation.**

## **VII. ATTACHMENTS**

1. Site map
2. Comprehensive Plan Richards Valley Subarea map



**FIGURE S-RV.1**  
**Richards Valley Land Use Plan**

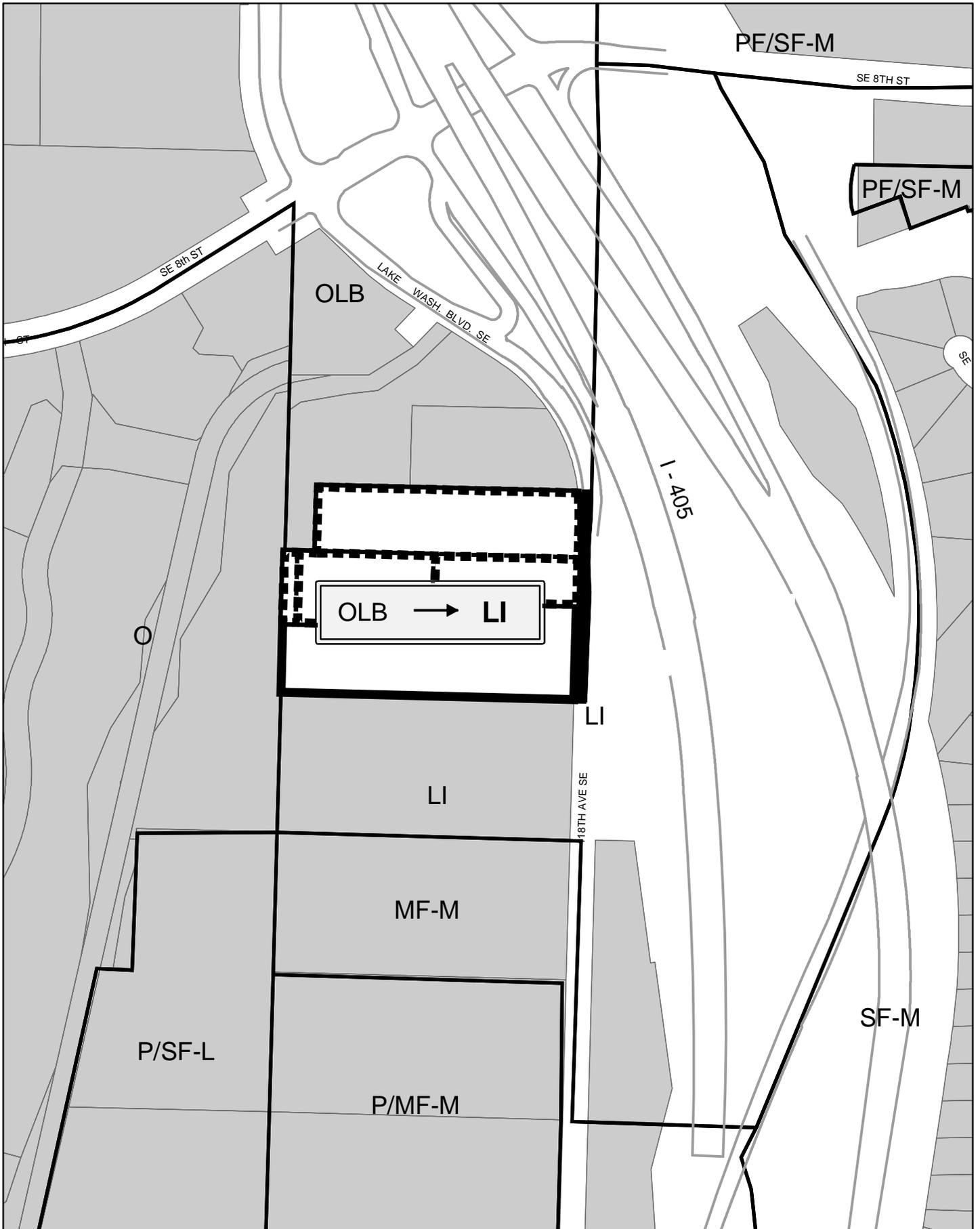
- SF Single Family
- MF Multi Family
- L Low Density
- M Medium Density
- H High Density
- UR Urban Residential

- 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
- ▭ Planning Districts
- ▬ Bellevue City Limits (6/2005)
- ▭ Lakes





March 2006

**Shurgard Storage CPA**  
 Proposed Comprehensive Plan Designations

1111 118th Ave SE