



Bellevue Planning Commission

January 14, 2026

PLANNING COMMISSION AGENDA ITEM

SUBJECT

Introduction and Geographic Scope: 2026 Annual Comprehensive Plan Amendments

STAFF CONTACTS

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POLICY ISSUES

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.

Land Use Code 20.30I.120 – Purpose

Pursuant to the state Growth Management Act (GMA), the Bellevue Land Use Code (LUC) permits property owners to propose site-specific amendments to the Comprehensive Plan (CPAs), and for any person or entity to propose non-site-specific (i.e., text) CPAs. These privately-initiated applications are accepted until September 15 and reviewed annually the following year. Proposed site-specific amendments, if approved, will be followed by a rezoning application.

The City processes these applications through procedures and criteria set forth in LUC 20.30I. Review of amendments follows a two-step procedure:

1. Threshold Review determines whether to include the proposal in the city's annual amendment work; and
2. Final Review considers a proposal's merits framed by the Comprehensive Plan.

Prior to the Threshold Review, Planning Commission shall review the geographic scope of any proposed amendments and consider an expansion of the geographic scope to include properties with shared characteristics.

DIRECTION NEEDED FROM THE PLANNING COMMISSION

ACTION	DIRECTION	INFORMATION ONLY
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1. Direct staff to expand the geographic scope of the application of the proposed amendment to the minimum necessary nearby parcels with shared characteristics that are similarly situated to the property in the application (LUC 20.301.140.F).
2. Direct staff to hold a public hearing for the Threshold Review.

Proposed Plan Amendment	Site-specific Proposal	Applicant
Evans Plaza 25 121477 AC 2255 140 th Avenue NE <i>Bridle Trails</i>	This privately-initiated application proposes a map amendment from General Commercial (GC) to Lowrise 2 Mixed Use on an approximately 9-acre site.	Steve Malsam

BACKGROUND/ANALYSIS

The Evans Plaza proposed plan amendment entails a requested change in land use designation from General Commercial (GC) to Lowrise 2 Mixed Use on an approximately 10-acre site (see permit application [25-121477 AC](#)). The site, Evans Plaza, is located north of SR-520, east of 136th Place NE, south of NE 24th Street, and west of 140th Avenue NE (see **Attachment A** and map below). The parcel numbers for the relevant properties here are 272505-9074, 272505-9179, 272505-9180, 272505-9181, and 272505-9233. Evans Plaza is currently occupied by several single-story commercial buildings. The tenants are a range of large and small commercial services, retail and restaurants.



The applicant has indicated that they are aiming to develop the property with mixed-use development with residential uses located above commercial uses. Residential uses are generally not permitted within the General Commercial land use district.

The site is located in the Bridle Trails neighborhood area, for which the Bridle Trails Subarea Plan is in effect. The Bridle Trails Subarea is divided into two planning districts: Planning District A and Planning District B. The site is located in Planning District A.

The site is in the PineView Neighborhood Center, identified on Map LU-2 in the Comprehensive Plan. Neighborhood Centers are commercial or mixed use areas in locations that are otherwise primarily residential. They are envisioned to serve some of the daily needs of people living in the area.

REVIEW PROCESS

GMA procedures (RCW 36.70A.470(2)) allow any interested person or persons to suggest plan amendments. Although any qualified person can propose an amendment to the plan, it is up to the City to determine whether the proposal should be included in the annual amendment process. In Bellevue, consideration of privately-initiated amendments is a two-step process with the first step being the Threshold Review and the second step the Final Review. The process was developed in 2001 (Ordinance No. 5328), subsequently revised in 2006 (Ordinance No. 5650) and 2019 (Ordinance No. 6495), and is consistent with administrative procedures at WAC 365-196-640 (6).

Threshold Review determines whether a proposal is appropriate for plan amendment review. Applications that have passed over the threshold will be considered together in the work program established by City Council action for Final Review.

Prior to threshold review, the City must consider whether to expand the boundaries of the proposed change to include nearby, similarly situated properties. This process is called Consideration of Geographic Scope and is the focus of this agenda item.

Final Review determines whether a proposal is appropriate for plan amendment review. Applications that have passed over the threshold will be considered together in the work program established by City Council action for Final Review.

CONSIDERATION OF GEOGRAPHIC SCOPE

Prior to the public hearing, the Planning Commission shall review the geographic scope of any proposed amendments. Expansion of the geographic scope may be recommended if nearby, similarly situated property shares the characteristics of the proposed amendment's site. Expansion shall be the minimum necessary to include properties with shared characteristics.

LUC 20.30I.130.A.1.a-ii – Consideration of Geographic Scope

Bellevue's Land Use Code directs the Planning Commission to consider the geographic scope of privately-initiated map amendments before conducting a public hearing for the Threshold Review (LUC 20.30I.130.A.1.a-ii). The criteria for expanding the scope to other properties is that those must be:

1. nearby
2. similarly situated, and
3. share characteristics with the proposed site.

The Planning Commission can expand the geographic scope if these criteria are met, provided the expansion must be the minimum necessary to include such properties. The following analysis will consider the above criteria individually and together.

Nearby. The expansion of the geographic scope would first extend to immediately adjacent parcels, then possibly beyond that. This analysis will identify the parcels that share a parcel boundary with or are across a public right-of-way from the proposed amendment site as the basis for analyzing the second and third criteria. The table below lists all parcels (identified by their parcel number) that either share a

parcel boundary with the Evans Plaza site or are across a public right-of-way from it (also see the map, **Attachment A**).

Similarly Situated. To identify whether a property is similarly situated, the salient characteristics must first be identified. In the case of the proposed amendment site, the following characteristics are the ones that distinguish it from other sites in the city:

1. Located within the Bridle Trails neighborhood area and its subarea plan's Planning District A.
2. In the PineView Neighborhood Center as identified in the city's Comprehensive Plan.

Properties located to the south of the proposed amendment site – parcel numbers 272505-9066, 272505-9222, 272505-9288, and 272505-9148 – are at a distance of more than 200 feet from its nearest boundary as they are separated by significant transportation infrastructure: SR-520, the trail running parallel to the state highway, and (in part) East Link light rail tracks running between BelRed and Overlake Village stations. Furthermore, the properties located south are in the BelRed neighborhood area. The situation of parcels in BelRed is substantially different because the relevant future land use designations and subarea plan policies are designed specifically for BelRed development characteristics and uses.

The remaining nearby properties listed above are all within the Bridle Trails neighborhood area. Only the Westminster Chapel property (parcel number 222505-9014) is outside of the PineView Neighborhood Center as identified in the Comprehensive Plan and is, therefore, not similarly situated.

Shared Characteristics. This analysis goes beyond the context to look at whether the site characteristics are similar to those of the proposed amendment site. As noted, this site is currently occupied by several single-story commercial buildings accommodating a range of commercial services, retail and restaurants.

The one immediately adjacent parcel (parcel number 272505-9167) and the properties immediately east of the site and across 140th Avenue NE (parcel numbers 272505-9028 and 272505-9183) are also occupied by retail uses in low-rise commercial buildings, except for the small undeveloped city property (parcel number 272505-9070). Like the proposed amendment site, these parcels are located within the area identified as the PineView Neighborhood Center and are currently designated as General Commercial on the Comprehensive Plan's Future Land Use Map (see **Attachment B**). This designation and the accompanying land use district do generally not permit residential uses.

The property located on the northeast corner of 140th Avenue NE and NE 24th Street (parcel number 272505-9028) has shared characteristics with the proposed amendment site as it is also occupied by a (currently vacant) single-story commercial building. However, the current land use designation of this parcel and the other remaining nearby parcels – located either west of 136th Place NE or north of NE 24th Street – is Lowrise Office Mixed Use, which already allows for a broad range of land uses including residential uses. As a result, these properties are not similarly situated.

Minimum Necessary. Per LUC 20.301.130.A.1.a-11, the expansion of the geographic scope of an amendment proposal is the minimum necessary to include nearby, similarly situated properties with shared characteristics. While sharing key characteristics, the proposed amendment site should not be geographically expanded to include the nearby properties east of 140th Avenue NE currently designated General Commercial. Such an expansion of geographic scope would not be in accordance with the relevant Land Use Code provision as the outcome would be to include another block, with a General Commercial land use designation, consisting of eight parcels and measuring a total area of approximately five acres. A shared General Commercial land use designation is insufficient as grounds for expansion of the geographic scope of the proposal.

Therefore, the staff recommendation is to only expand the geographic scope of the amendment to include the half-acre corner parcel as the minimum necessary due to shared characteristics of access, land use and development patterns.

Parcel Number	Address	Current Condition	Similarly Situated	Shared Characteristics	Minimum Necessary
272505-9167	2353 140 th Avenue NE	7-Eleven convenience store and gas station	X	X	X
222505-9032	2455 140 th Avenue NE	Park 140 business park	X		
222505-9221	2400 140 th Avenue NE	Vacant gas and service station	X		
272505-9028	2350 140 th Avenue NE	Dunn Lumber hardware store	X	X	
272505-9183	2310 140 th Avenue NE	Dunn Lumber hardware store	X	X	
272505-9070	2340 140 th Avenue NE	Undeveloped City of Bellevue property	X		
272505-9066	2105 140 th Avenue NE	Retail store			
272505-9222	2111 140 th Avenue NE	Commercial service building			
272505-9288	13804 NE 20 th Street	Undeveloped property (former Sound Transit construction staging area)			
272505-9148	13710 NE 20 th Street	Industrial park			
272505-9116	13629 NE 24 th Street	Undeveloped, wooded Puget Sound Energy property	X		
222505-9014	13646 NE 24 th Street	Westminster Chapel			

STAFF RECOMMENDATION

Staff recommends expanding the geographic scope of the proposed amendment to include the one immediately adjacent parcel (parcel number 272505-9167), which is located on the southwest corner of 140th Avenue NE and NE 24th Street.

Expansion of the geographic scope would result in a proposed amendment site that includes all parcels within the block bounded by SR-520, 136th Place NE, NE 24th Street, and 140th Avenue NE. This block is part of the area identified as the PineView Neighborhood Center in the Comprehensive Plan and located within the Bridle Trails neighborhood area. Furthermore, these parcels share key characteristics in terms of land use, development patterns and access. The corner parcel's existing retail use would be consistent with the proposed Lowrise 2 Mixed Use land use designation while allowing for any potential future redevelopment, following a rezone application, to include residential uses, which are generally not permitted under its current land use designation and land use district.

ATTACHMENTS

- A. Location Map of Evans Plaza
- B. Future Land Use Map of Evans Plaza