



Planning Commission

TRANSMITTAL

DATE: April 9, 2015

TO: Mayor Balducci and Members of the City Council

FROM: Aaron Laing, Chair
Members of the Bellevue Planning Commission

SUBJECT: Threshold Review Recommendation for 2015 **privately-initiated** site-specific Comprehensive Plan Amendments (CPA): **St. Luke's Lutheran Church CPA (15-103696 AC)**

The Planning Commission recommends by a vote of 6-0 that the City Council initiate the St. Luke's Lutheran Church site-specific Comprehensive Plan Amendment (CPA) proposal, and not geographically expand it.

I. SUMMARY OF PROPOSAL

If approved, this privately-initiated application would amend the map designation on this 4.3-acre site from Single-Family Medium (SF-M) to Multifamily Medium (MF-M). The single property is a church and related uses. See Attachment PC-1.

If the CPA were adopted, the applicant's stated purpose is to "increase opportunities for affordable housing to serve and practice inclusivity for all people and to seek partnerships to encourage and build economic diversity." The applicant has indicated intent to work with Imagine Housing, a nonprofit organization which develops affordable housing, to construct multifamily housing on its church campus.

II. RECOMMENDATION

The Planning Commission finds that the Threshold Review Decision Criteria have been satisfied for this proposed Comprehensive Plan Amendment as set forth in the Land Use Code in Section 20.30L.140 (Threshold Review Decision Criteria).

The city's land use strategies are to ensure that redevelopment fits into neighborhoods with a goal of maintaining and enhancing shared qualities of stability, maintenance, and healthy levels of re-investment. In this regard religious institutions face the same issues as other property owners in neighborhoods.

The application, its map change intent and purpose are directly responsive to Comprehensive Plan policy implementing infill development in Bellevue.

Policy continues to evolve to address the various roles that religious institutions seek, such as affordable housing, and special needs populations. This is a circumstance not anticipated by the plan, so it is worthwhile to test each site-specific proposal against existing land use and subarea policies. The lack of policy regarding the appropriate role of religious institution sites in a land use context and the change related to this site-specific map amendment suggest implications of a magnitude that it needs to be addressed for the plan to function as an integrated whole.

III. BACKGROUND

This site is developed with a church and building for associated uses, existing parking, detention areas and open space. It has been a church for a number of years, with a twenty-five year history of service to host organizations that serve the needs of the homeless in the region.

The site's permit history with the city shows consistency in maintaining and upgrading the property and its assets as the church engaged in its social advocacy roles.

IV. PUBLIC NOTICE AND COMMENT

The application was introduced to the Planning Commission during study session on March 11, 2015. Notice of the Application was published in the Weekly Permit Bulletin on March 5, 2015, and mailed and posted as required by LUC 20.35.420. Notice of the April 8, 2015, Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on March 19, 2015, and included notice sent to parties of record.

Comments were made at the public hearing. The applicant's testimony included the former pastor and current church board president explaining the history of their church's mission and their decades-long role in this north Bellevue community. Imagine Housing staff also testified to the application, their assessment of its CPA consistency, and project details around the proposed amendment. Additional testimony was offered by a long-time resident who believes that turning a parking lot into affordable housing makes the Bellevue community stronger. Additional testimony was offered by a member of the Northtowne Community Association who, while not disagreeing with the worthwhile nature of the project as enabled by the amendment process, expressed concern about the levels of pedestrian safety in this area and the potential for the project to make that worse. Written comments received prior to the hearing expressed concern about the amount of traffic which would be generated from redevelopment.

V. STATE ENVIRONMENTAL POLICY ACT (SEPA)

The proposed amendment would be subject to State Environmental Policy Act review, if it is included in the Annual Comprehensive Plan Amendment Work Program. The Environmental Coordinator of the City of Bellevue will determine a Threshold Decision.

VI. REVIEW PROCESS AND APPLICATION OF 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.

Based on the criteria, the Planning Commission recommends that the 2015 annual CPA work program include the St. Luke's Lutheran Church privately initiated site-specific CPA proposal. This recommendation is based on information in the application materials, the staff report, and testimony and material provided at the public hearing.

This conclusion is based on the following analysis:

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

The appropriate land use designation on a specific site or sites is a matter appropriately addressed through amendment of the Comprehensive Plan.

- 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.

- 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 more appropriately addressed by an ongoing work program. The annual CPA process has been appropriate for each of the times that religious institutions have sought a land use role in providing affordable housing (Overlake Park Presbyterian 93-1755 AC, Neighborhood Church 96-1229 AC, St. Margaret's Church 07-117934 AC, Newport Covenant Church 08-103697 AC and Holy Cross 12-104586 AC)

- 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.

- 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 proposal addresses significantly changed conditions where changes related to the pertinent Plan map or text have implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole.

Residential zoning and the conditional use permit process that permits religious institutions in residentially-zoned neighborhoods has in the past considered them primarily a religious service. As these institutions have now begun to further their community-based missions around their facilities their appropriate role in neighborhoods and the city was something not anticipated by the Comprehensive Plan. Also, as city policy addresses the growing need for affordable housing and the roles that non-traditional providers have played (such as St. Margaret's) and can play (such as St. Luke's) the Comprehensive Plan did not anticipate using such sites for affordable housing.

- 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 Land Use Code states that expansion of the geographic scope is recommended for a site-specific proposal if nearby, similarly-situated property shares the characteristics of the proposed amendment site. Expansion shall be the minimum necessary to include properties with shared characteristics.

Staff does not recommend expansion of the geographic scope of the proposed St. Luke's Lutheran Church CPA.

Existing multifamily developed at R-20 densities borders the St. Luke's Lutheran Church site on the north, east, and south. A northeast portion of the site borders existing office developed at OLB densities. Bellevue Way borders the site on the west. See Attachment 3. There are no shared characteristics with the multifamily and office properties that already border the site, and the single-family districts to the west are separated from the church property by the five-lane Bellevue Way arterial.

- 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 application, its map change intent and purpose are directly responsive to Comprehensive Plan policy implementing infill development in Bellevue.

The city's land use strategies are to ensure that redevelopment fits into neighborhoods with a goal of maintaining and enhancing shared qualities of stability, maintenance, and healthy levels of re-investment. In this regard religious institutions face the same issues as other property owners in neighborhoods.

The applicant's stated purpose and intent suggests the reason for the proposed amendment is consistent with current general policies in the Comprehensive Plan for site-specific proposals that call for maintaining compatible use and design, reducing regional consumption of undeveloped land, and providing for a broad range of housing choices.

Land Use Element policies call for maintaining compatible use and design with the surrounding built environment when considering redevelopment; reducing the regional consumption of undeveloped land by facilitating redevelopment, and providing through regulation the potential for a broad range of housing choices.

Policy LU-9: *Maintain compatible use and design with the surrounding built environment when considering new development or redevelopment within an already developed area.*

Policy LU-13: *Reduce the regional consumption of undeveloped land by facilitating redevelopment of existing developed land when appropriate.*

Policy LU-23: *Provide, through land use regulation, the potential for a broad range of housing choices to meet the changing needs of the community.*

Housing policies are complementary to the Land Use policies noting infill is appropriate on sites with adequate services and which are compatible with surroundings; that affordable housing opportunities are dispersed around the city; and that both public and private sectors are involved in the provision of affordable housing.

Policy HO-17: *Encourage infill development on vacant or under-utilized sites that have adequate urban services and ensure that the infill is compatible with the surrounding neighborhoods.*

Policy HO-25: *Ensure that affordable housing opportunities are not concentrated, but rather are dispersed throughout the city.*

Policy HO-26: *Involve both the public and private sectors in the provision of affordable housing.*

North Bellevue Subarea policies Residential Development goals encourage an expanded supply of housing through new construction, restoration, or the reasonable conversion of existing units while protecting the livability of existing neighborhoods, and policy S-NB-12 encourage a variety of housing densities and types of residential areas so that there will be housing opportunities for a broader cross-section of the community. In examining the site for its potential for practical implementation the applicants considered Policy S-NB-12 which seeks to account for the protection of environmentally critical areas.

Residential Development Goal:

To encourage an expanded supply of housing through new construction, restoration, or the reasonable conversion of existing units while protecting the livability of existing neighborhoods.

Policy S-NB-12: *Encourage a variety of housing densities and types of residential areas so that there will be housing opportunities for a broader cross section of the community.*

POLICY S-NB-10. *Promote the retention and protection of open drainage courses and storm water detention facilities through the acquisition of land or easements or through their incorporation into the design of private development.*

The proposed CPA is consistent 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.*

DP-39: *Develop neighborhood planning and design processes that encourage infill development, redevelopment, and reuse of existing buildings and that, where appropriate based on local plans, enhance the existing community character and mix of uses.*

and:

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

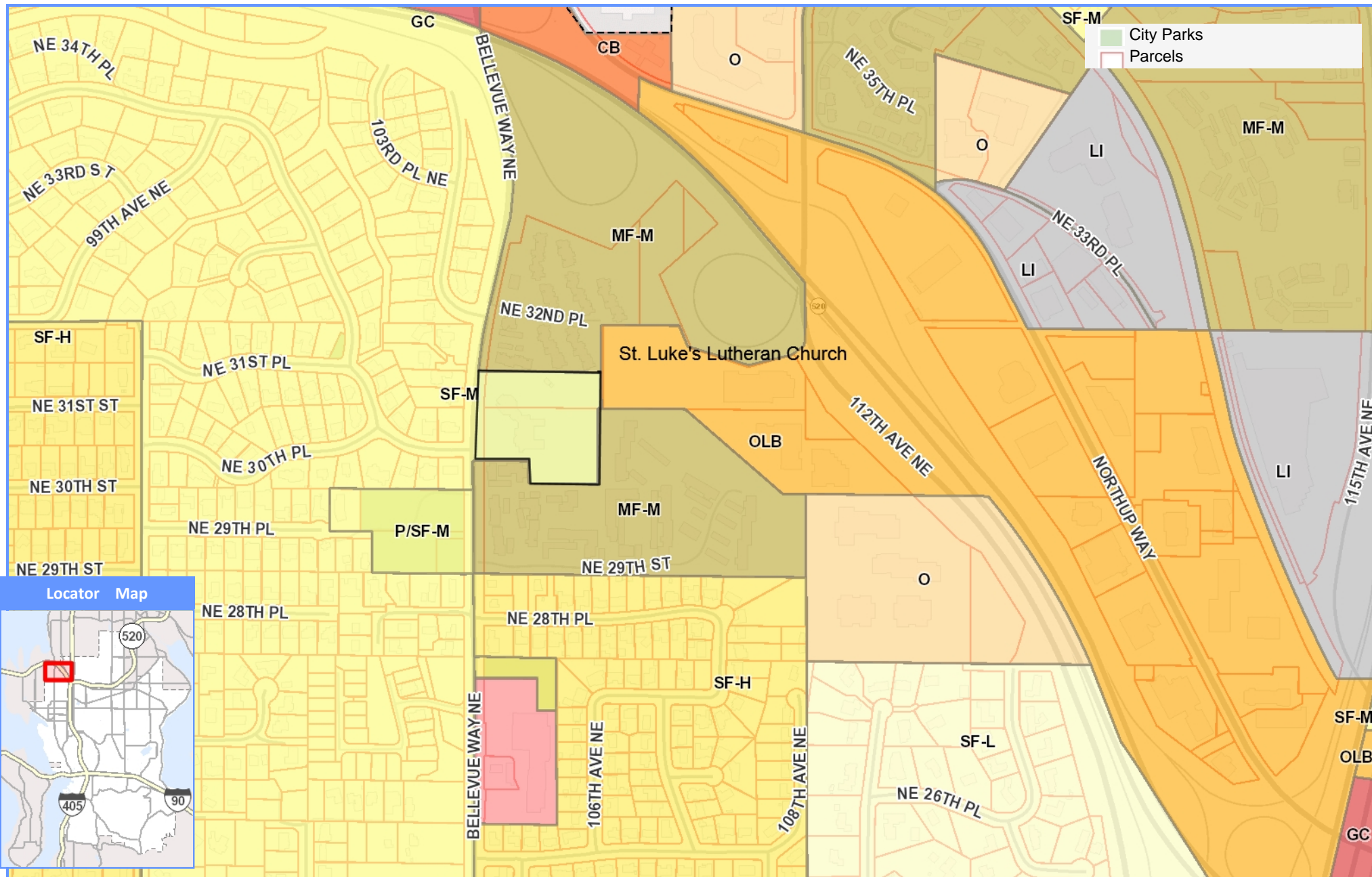
State law or a decision of a court or administrative agency has not directed the suggested change.

VII. CONCLUSION

The Planning Commission recommends by a vote of 6-0 the City Council initiate the St. Luke's Lutheran Church site-specific Comprehensive Plan Amendment (CPA) proposal into the 2015 Annual CPA work program.

VIII. ATTACHMENTS

PC-1. Proposed CPA site area



St. Luke's Lutheran Church CPA

0 521 1,041
Scale 1: 6,247 Feet

