



## Planning Commission

# TRANSMITTAL

DATE: May 20, 2015

TO: Mayor Balducci and Members of the City Council

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

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

### I. RECOMMENDATION

With this Transmittal the Planning Commission recommends by a unanimous 6-0 vote that the City Council:

- APPROVE the St. Luke's Lutheran Church site-specific Comprehensive Plan Amendment to amend the map designation on this 4.3-acre site from Single Family-Medium (SF-M) to Multifamily-Medium (MF-M).

This proposal satisfies the Final Review Decision Criteria for a Comprehensive Plan Amendment as set forth in the Land Use Code in Section 20.30I.150. The Planning Commission came to this recommendation through the Final Review steps in the CPA process, and after taking and hearing testimony from the CPA site's property owners and others.

The Commission concluded that the proposed amendment is directly responsive to Comprehensive Plan policy implementing infill development in Bellevue; that it addresses the interests and changed needs of the entire city regarding the land use role that religious institutions have sought in providing affordable housing; that it addresses the significantly changed condition of where changes to the pertinent plan map or text have implications of a magnitude—an evolving role for religious institutions in neighborhoods around their community-based missions that was not anticipated by the Plan—that need to be addressed for the Plan to function as an integrated whole; that the proposal is suitable for development with adjacent land use and the surrounding development pattern; and demonstrates a public benefit by addressing the growing need for affordable housing and the roles that non-traditional providers can play.

## **II. BACKGROUND**

The City Council directed the application for Final Review following Threshold Review of the privately-initiated St. Luke’s Lutheran Church Comprehensive Plan Amendment (CPA) on April 20, 2015.

This site is developed with a church and building for associated uses and an existing woman’s shelter, 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 is zoned single family while adjacent on three sides are existing multifamily housing and office uses. The fourth side is Bellevue Way and across that street are existing single family.

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 to “a) promote a diversity of housing stock within a subarea that is linked to neighborhood amenities and public transit; b) support mobility and lessen dependency on private vehicles for working and shopping; c) allow for infill development for an underutilized property to meet the needs of a broader economic segment of the community; and d) allow the church to collaborate with appropriate development constituents and work programs to allow affordability for the longest term possible.”

## **III. 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 Threshold Review 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.

Notice of the May 13, 2015, Final Review Public Hearing before the Planning Commission was published in the Weekly Permit Bulletin on April 23, 2015, and included notice sent to parties of record.

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 2015 amendment to the Bellevue Comprehensive Plan was provided to state agencies on April 10, 2015, for review.

The Planning Commission made its Final Review recommendation on the proposal after considering the staff report recommendation, the proposal application, the record provided, and public testimony submitted in writing or given at the May 13, 2015 public hearing.

Public comment letters were submitted by the applicant and by its partner Imagine Housing in support of the proposal and the church's longstanding roles in social advocacy. Two parties of record submitted comments, and provided testimony at the hearing addressing concerns about pedestrian safety in the area due to high traffic volumes and about traffic increases in an area already experiencing congestion. These are included in the Council Document Library materials.

Other public testimony at the hearing was provided by the head of student services at the Bellevue School District and a counselor at Newport High School. They noted in their testimony that the district's homeless student population and its ability to have a safe and suitable learning environment is directly affected by a lack of affordable housing on the Eastside in this growing school district. Efforts such as at this application should continue to be encouraged and developed.

#### **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 April 23, 2015.

#### **V. REVIEW PROCESS AND APPLICATION OF DECISION CRITERIA**

The Final Review Decision Criteria for a proposed Comprehensive Plan Amendment are set forth in the Land Use Code, Section 20.30I.150. A proposal must meet all of the criteria to be recommended for approval.

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 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.*

### **Growth Management Act**

The proposal is consistent with GMA planning goals encouraging urban growth where adequate public facilities and services exist or can be provided in an efficient manner in specific areas, and by ensuring that those public facilities and services necessary to support development are adequate to serve the development at the time development is available for occupancy and use without decreasing current service levels below Bellevue standards.

### **Countywide Planning Policies**

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.*

### **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 the interests and changed needs of the entire city. 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)

### **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 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.

**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**

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 classification.

Adjacent land uses to the church on three sides are existing R-20 multifamily and an OLB office complex. The church's fourth side is Bellevue Way; across the road to the west is existing single family. If the site were completely developed as multifamily under the proposed multifamily designation it would be in general conformance with this adjacent land use and development pattern; the fact that the church proposes to remain while adding a multifamily component is even more in general conformance with adjacent land use and development patterns.

The site could be redeveloped in general conformance with R-20 zoning standards; churches are conditionally permitted in such residential zones and multifamily is permitted by right. The site contains an existing wetland; the church/multifamily proposal stays away from that area as would a general redevelopment proposal.

Redevelopment would also bring into conformance the site's existing parking and detention facilities.

Using information provided by PCD about likely redevelopment of the site under the proposal, the Transportation Department estimates of trip generation concluded that both the church/multifamily proposal and an all-multifamily proposal would increase pm peak trips from the current 10 to 42. This volume of trips will not fail the concurrency test. A separate concurrency analysis would be required with a development application, and examination would occur of operational impacts at the access point to see if mitigation were needed, such as turn restrictions.

The proposed rezone would increase potential build out and increase demand on both the water and sewer systems. The increased capacity necessary with the rezone would be determined at the time of the actual development proposal. Offsite improvements, specifically sewer capacity improvements, may be needed as a result of this rezone and any future development proposal.

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

The proposal demonstrates a public benefit and enhances the public health, safety and welfare of the city because 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 addressing their appropriate role in neighborhoods and the city demonstrates a public benefit. Also, city policy can enhance the public health, safety and welfare of the city by addressing 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).

## **VI. CONCLUSION**

The Planning Commission recommends by a unanimous vote that the City Council **approve** the St. Luke's Lutheran Church site-specific Comprehensive Plan Amendment (CPA).