





## CITY OF BELLEVUE



### Land Use Application #856014 - DASH Glendale & Evergreen Court Affordable Hou

#### Project Contact

**Company Name:** DASH / Downtown Action to Save Housing

**Name:** Chris Buchanan

**Email:** chrisb@dashhousing.org

**Address:** 11018 NE 11th St  
Bellevue WA 98004

**Phone #:** 2064597715

#### Project Type

Multifamily Residential

#### Activity Type

Code or Plan Amendments and Interpretations

#### Scope of Work

Comprehensive Plan Amendment

**Project Name:** DASH Glendale & Evergreen Court Affordable Hou

**Description of Work:** Amend the Comprehensive Plan to allow a rezone of the existing Evergreen Court and Glendale apartment sites in order to increase density and add affordable housing units for Bellevue's seniors, families, and workforce.

#### Project Details

##### Site Information

Site Specific

##### Customer Feedback

Yes, I am willing to share my feedback through an online survey

##### Additional Parcels:

2825059061



September 5, 2020

Jessica Clawson  
McCollough Hill Leary PS  
701 Fifth Avenue, Suite 6600  
Seattle WA 98104  
[jclawson@mhseattle.com](mailto:jclawson@mhseattle.com)

SUBJECT: Intake Application letter for proposed 2021 Comprehensive Plan Amendment application, DASH, 12600 NE 8th Street and 900 124th Avenue NE

Ms. Clawson:

This is the intake application letter you must submit with your application materials to separately apply for a proposed site-specific comprehensive plan amendment.

*An "intake application" letter from Community Development staff is required before a site-specific plan amendment application will be accepted (a non-site-specific, or policy amendment, does not require the letter.) Please contact Community Development staff to have a discussion regarding a proposed site-specific plan amendment. This discussion--by phone, email, or in-person--will result in the "intake application" letter necessary to separately apply for the site-specific plan amendment application.*

This discussion was held on September 1, 2020. You've indicated intent to propose a change from Multifamily-Medium to Neighborhood Mixed Use which would allow a subsequent rezone of the existing Glendale Apartment and Evergreen Court sites, which in turn through complete redevelopment serve to increase housing capacity and add permanent units to the city's affordable housing inventory.

DASH is an affordable housing developer founded by the BDA in 1991 to provide affordable workforce housing in Downtown Bellevue. Today, DASH owns and maintains 798 units of housing for individuals, families and seniors earning between 30% - 60% AMI. Two hundred seventy-two units in the City of Bellevue's Downtown and Wilburton neighborhoods house nearly 500 people.

Staff notes that the proposed amendment will provide opportunities to examine needed housing opportunities for all segments of the community; encourage housing in an area with access to a full range of transportation options; and implement Bellevue's Affordable Housing Strategy (including Strategy C-1) adopted by the City Council on June 5, 2017. These are citywide housing issues.

### Analysis

You made a 2018 application that was at Threshold Review directed into the Wilburton-Grand Connection Land Use and Transportation Project by the City Council. The city has  
September 10, 2020 2021 intake application letter.

not yet begun this work program which is intended to result in plan and code amendments for the Wilburton Study Area. DASH has indicated previously that building age and refinancing considerations play an increasingly deadline-driven role in needing to make a decision about the sites' future.

The city's annual Comprehensive Plan Amendment process affords property owners the chance to petition for changes to the long-range, comprehensive plan, aligning project intent and vision with the Comprehensive Plan issues raised by the application, including the most effective opportunities to increase permanently affordable housing in Bellevue:

- The issue of **appropriate land use** on this site—including its existing and future use of the site for permanent affordable housing—is consistent with City Council Principles (#9, Affordable Housing Opportunities) to “Consider opportunities for land use changes in the area to provide for affordable housing.”
- The DASH-Glendale site is **similarly-situated** with property already within the Study Area, being within the half-mile Wilburton East Link station walkshed and able to take advantage of land use and transit infrastructure being built in support of city efforts in Downtown, BelRed, and Wilburton.
- The DASH proposal represents a **specific opportunity** to leverage affordable housing in mitigation of environmental impacts identified for the Wilburton-Grand Connection Land Use and Transportation Project.

The Wilburton/NE 8th St Subarea Plan applies to this site. Policies applicable to this site include but are not limited to:

- POLICY S-WI-22. Seek affordable and “work force” housing in new mixed use developments through regulatory and incentive approaches.
- POLICY S-WI-45. Develop an entrance in the N.E. 8th Street corridor to create a sense of entry to the corridor.
- POLICY S-WI-49. Allow flexibility for commercial buildings to be sited near frontage property lines.

You noted a desire for additional understanding of allowed capacity with a mixed-use design; intending to realize site capacity by measuring density through the NMU district's FAR-based density standard. You also would need to address other requirements associated with an NMU designation including the use of a Development Agreement to address site development standards especially when realized by taking advantage of the application of the Affordable Housing Strategy

You have advised the city that you have read the Comprehensive Plan Amendment Procedures Guide and that you and your client are fully aware of the application procedures including the start of the three-year limit once an application is considered complete. The three-year limit—if applied to a 2021 proposed site-specific application—would prevent consideration of the site's Comprehensive Plan designation until the 2024 plan review year.

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Please let me know what else we can provide.



Recoverable Signature

X Nicholas K Matz

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Nicholas K Matz

Senior Planner

Signed by: nmatz@bellevuewa.gov

Nicholas Matz AICP  
Senior Planner, Comprehensive Planning  
[nmatz@bellevuewa.gov](mailto:nmatz@bellevuewa.gov)  
425 452-5371

September 10, 2020 2021 intake application letter.



# Comprehensive Plan Amendment

Application Date \_\_\_\_\_

Application Name \_\_\_\_\_

Applicant Name \_\_\_\_\_

Applicant Address \_\_\_\_\_

Applicant Phone \_\_\_\_\_ email \_\_\_\_\_

Agent Contact \_\_\_\_\_

Agent Contact Address \_\_\_\_\_

Agent Contact Phone \_\_\_\_\_ email \_\_\_\_\_

\_\_\_\_ 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 \_\_\_\_\_

Proposed amendment to change the map designation from existing \_\_\_\_\_  
to proposed \_\_\_\_\_

Site area (in acres or square feet) \_\_\_\_\_

Subarea name \_\_\_\_\_

Last date the Comprehensive Plan designation was considered \_\_\_\_\_

Current land use district (zoning) \_\_\_\_\_

Go to [Block 3](#)

Community Council: \_\_\_\_ N/A \_\_\_\_ East Bellevue

## Block 2

Proposed amendment language. This can be either conceptual or specific amendatory language. Please be as specific as possible so that your proposal can be adequately evaluated. Specific wording changes proposed, should be shown in ~~strike out~~/underline format. Submit additional pages as PDF.

Reference Element of the Comprehensive Plan (e.g., Land Use, Transportation, Housing, Capital Facilities) \_\_\_\_\_

Last date the Comprehensive Plan policy or text was considered \_\_\_\_\_

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. Include any data, research or reasoning that supports the proposed amendment. Submit additional pages as PDF.

Go to [Block 4](#)

**Block 4**


Evaluating the proposed amendment. Explain how the proposed amendment is consistent with the Threshold Review Decision Criteria in LUC Section 20.301.140 (refer to Comprehensive Plan Amendment and Procedures Guide). Submit additional pages as PDF.

see attached

X I have read the Comprehensive Plan Amendment and Procedures Guide.

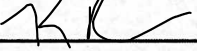
X I have contacted Community Development staff and have received an intake application letter (required before site-specific plan amendment application submittal; attach a copy of the letter to the application form when uploading documents).

**Notice of Completeness:** Your application is considered complete 29 days after submittal, unless otherwise notified.

Signature of applicant  Date 9/14/2020

*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 9/14/20  
Owner or Owner's Agent

# DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application

## BLOCK 3

### Background

The City of Bellevue has a *demonstrated need* for more affordable housing units. Renters, and in particular Seniors who rent in Bellevue have the highest rate of cost-burdened households in King County.<sup>1</sup> In the City's own Housing Needs Assessment dated March 2016, Bellevue identified over 9,100 households (17% of households or about 22,000 people) have low and very low incomes but only 3,095 units in Bellevue are affordable to these people.<sup>2</sup> The Housing Strategy adopted in 2017 calls for the addition of 2500 units of affordable housing in 10 years which, while admirable, does not meet the identified demand. In the time since Council adopted the Housing Strategy, Bellevue has added only 342 new units and preserved 240 existing units of affordable housing.<sup>3</sup>

DASH is an affordable housing developer founded by the Bellevue Downtown Association in 1991 to provide affordable workforce housing in Downtown Bellevue. Today, DASH owns and maintains 798 units of housing for individuals, families and seniors earning between 30% - 60% AMI. 272 units are located in the City of Bellevue's Downtown and Wilburton neighborhoods, housing nearly 500 people.

In 2018 DASH asked for a Comprehensive Plan Amendment to allow a subsequent rezone of the existing Glendale Apartments site located in the Wilburton neighborhood from Multifamily-Medium to Neighborhood Mixed Use in order to increase density and add permanent affordable housing units. During the CPA process in 2018, the geographic range of that application was extended to encompass Evergreen Court, and ultimately the CPA was diverted into the Wilburton sub-area workplan. However, since that time ***no action*** has been taken to advance the Wilburton workplan and that plan is *still pending Council authorization* to proceed.

As a result of the failure to advance the Wilburton sub-area workplan or any other meaningful action to advance the development of affordable housing since our 2018 CPA application, DASH again asks for a Comprehensive Plan Amendment to allow a subsequent rezone of the existing Evergreen Court and Glendale Apartments sites in order to increase density and add permanent affordable housing units.

This proposed amendment provides an opportunity to:

- Examine needed housing opportunities for all economic segments of the community;

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<sup>1</sup> Washington State University, Metropolitan Center for Applied Research January 2018 study "Moving Toward Age Friendly Housing in King County"

<sup>2</sup> City of Bellevue Housing Needs Assessment March 2016, page 3.

<sup>3</sup> Bellevue Affordable Housing Council Report March 9, 2020.

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- Encourage housing in an area with access to a full range of transportation options; and
- Implement Bellevue's Affordable Housing Strategy adopted by the City Council on June 5, 2017.
- Enable the development of affordable housing for seniors

The proposed amendment is consistent with the Comprehensive Plan's Visions for:

### **Land Use**

Bellevue grows in a manner that enhances the livability of the community, while maintaining the elements that residents cherish<sup>4</sup>; and

### **Housing**

Bellevue meets the housing needs of its diverse population, strengthening neighborhoods and communities<sup>5</sup>.

The proposal to amend the Comprehensive Plan at this site from MF-M to NMU is supported by Bellevue's Affordable Housing Strategy Actions C-1, C-4, and D-3 to increase density of affordable housing at the Glendale and Evergreen Court sites. It will provide additional, permanently affordable units for individuals, families, and seniors in the low- to moderate- income range.

### Bellevue's Affordable Housing Strategy

In 2016 DASH participated in the Technical Advisory Group convened to assist in developing the City of Bellevue's Affordable Housing Strategy. Among the recommendations provided to and adopted by Council on June 5, 2017 were the following actions:

- A-1 Partner with non-profit organizations and housing agencies to fund the purchase of existing affordable multi-family housing to preserve it for the long term
- C-1 Increase development potential on suitable land owned by public agencies, faith-based, and non-profit housing entities for affordable housing.
- C-4 Inclusionary zoning: Increase zoning as an incentive to provide

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<sup>4</sup> City of Bellevue Comprehensive plan, pg. 4

<sup>5</sup> City of Bellevue Comprehensive plan, pg. 5

## **DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application**

affordable units in new development.

- D-3      Change the city's approach to density calculation in multi-family zones to allow more flexibility in unit size and type.

Neighborhood Mixed Use (NMU) is currently the best choice to provide opportunities for increased affordable housing densities at Glendale and Evergreen Court.

### Bellevue's Comprehensive Plan

This proposal to allow additional permanent affordable housing units at the Glendale and Evergreen Court sites is consistent with Comprehensive Plan Housing Element goal to provide housing opportunities for all economic segments of the community. Key findings in the Housing section of the 2015 Comprehensive Plan states:

Moderate and low income households have limited housing options in the city. Only 31 percent of Bellevue's housing stock is affordable to households with moderate incomes (earning less than 80 percent of King County median income) and only 9 percent is affordable to low income households earning less than 50 percent of King County median income.<sup>6</sup>

The Wilburton neighborhood has the highest percentage of rent burdened population in the city at 22%.<sup>7</sup>

Additional affordable housing units on the existing Glendale and Evergreen Court sites further Comprehensive Plan Policies to address Bellevue's housing needs, increase affordable housing units, and encourage housing in areas with access to a full range of transportation options as stated in these policies:

- HO-7      Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.
- HO-20     Encourage a range of housing types for seniors affordable at a variety of income levels.
- HO-21     Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate income households, through the city's affordable housing programs.
- HO-23     Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.

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<sup>6</sup> City of Bellevue Comprehensive plan, pg. 79

<sup>7</sup> City of Bellevue Comprehensive plan, Map HO-1, pg. 90

## **DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application**

- HO-26 Provide incentives and work in partnership with not-for-profit and for-profit developers and agencies to build permanent low- and moderate-income housing.
- HO-27 Encourage preservation, maintenance, and improvements to existing affordable housing.
- LU-3 Promote a land use pattern and an integrated multimodal transportation system.

The increased density and addition of affordable housing units at the Glendale and Evergreen Court sites would implement the final call to action in the Comprehensive Plan:

- HO-24 Develop and implement an effective strategy to ensure affordable housing opportunities are available Downtown and throughout the city at a range of affordability levels. Monitor quantity, types, and affordability of housing achieved for potential unintended consequences and to determine if the need is being met.

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## **BLOCK 4**

**A.** This matter is appropriately addressed through the Comprehensive Plan. The Comprehensive Plan Amendment process appropriately assesses changes in the area such as

- the Affordable Housing Strategy itself
- the increasing presence of transportation alternatives serving the area including Rapid Ride “B” service
- future light rail service through the neighborhood; and
- Bellevue’s Wilburton-Grand Connection Commercial Areas study

to evaluate increased density for new permanent affordable housing units at the Glendale site.

**B.** The proposed amendment is in compliance with the three-year limitation rules.

**C.** While it is possible that the proposed amendment may be addressed by the existing Wilburton sub-area study, we have lost faith in the City’s ability to move that workplan forward in a meaningful and timely way. That work program was authorized in December 2015 and was charged with establishing an urban design vision for the Grand Connection and a new land use vision for the Wilburton commercial area.<sup>8</sup> On December 7, 2017 the Wilburton CAC issued a memorandum containing draft policy statements on Affordable Housing which include the following Land Use recommendations:

Establishing policy framework for creating a bonus/incentive system similar to BelRed, including:

- Affordable housing as the initial and primary public benefit
- Using density bonuses to strongly incentivize housing affordable to people earning 80% or less of area median income
- Prioritizing the construction of affordable units within market rate housing developments over forms of alternative compliance such as in-lieu fees<sup>9</sup>

All of the above considerations are applicable to DASH’s existing Affordable Housing site in the Wilburton neighborhood.

In 2018, the Wilburton CAC, the Planning Commission and the City Council all agreed that the Wilburton area plan would offer the highest potential upzone for the Evergreen

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<sup>8</sup> Bellevue Planning Initiatives, Wilburton - Grand Connection home page

<sup>9</sup> MEMO: Wilburton CAC 12/7/2017

## **DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application**

Court and Glendale properties. Unfortunately, in the time since 2018, Council has failed to authorize work to proceed on the Wilburton sub-area plan effectively sidelining our efforts to create more affordable housing units. There is currently ***no timeline*** for work to resume on the Wilburton sub-area plan. Therefore, we no longer consider this a functional option to increase density at our properties.

**D.** The proposed amendment can be reasonably reviewed within the resources and time frame for the annual Comprehensive Plan work program.

**E.** The proposed amendment addresses significantly changed conditions since the last time the Comp Plan map or text for the Glendale site was amended.

While the call to action to create a housing strategy in policy HO-24 exists in the Comprehensive Plan, the full impact of Bellevue's Affordable Housing Strategy adopted by Council on June 5, 2017 cannot have been anticipated by the Comprehensive Plan.

Nor did the current comprehensive plan anticipate the new connections to the Downtown core, workplaces and services that are now provided through the King County Metro Rapid Ride "B" line. This service runs alongside Glendale Apartments and the nearest station is 0.1 miles from the property. The future light rail station on 124<sup>th</sup> Street is approximately 0.5 miles from Glendale and will provide further connectivity to work and services throughout the region.

The passage of the Sound Transit 3 ballot measure in 2016 funding Sound Transit's east side expansion and the mandate requiring development of Affordable Housing and transit-oriented development is a changed condition. As a result of this measure, there is now a regional focus to increase housing density and provide Affordable Housing units in rapid transit walk-sheds. The Wilburton neighborhood including the Glendale and Evergreen Court properties benefit from these new rapid transit connections.

The Wilburton sub-area study is itself recognition of the change in condition of the underlying infrastructure and transportation serving the neighborhood, and Bellevue's desire to broaden connections to high growth areas. The land use changes now under consideration for this neighborhood were not anticipated in the Comprehensive Plan.

**F.** There are no other nearby, similarly-situated properties to include in an expansion of geographic scope. We believe this was already proved in our original Glendale CPA in 2018 and subsequent expansion to include Evergreen Court.

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**G.** The Comprehensive Plan contains general policies for the consideration of this type of site-specific amendment, including Housing Opportunity and Affordable Housing policies previously referenced in this application and the following:

- LU-3      Support a land use pattern and an integrated multimodal transportation system.
- LU-21     Support development of compact, livable, and walkable mixed-use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
- ED-16     Encourage development of a range of housing opportunities to accommodate Bellevue's growing workforce
- TR-1      Integrate land use and transportation decisions to ensure that the two mutually support the Comprehensive Plan
- TR-7.1    Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that transit may support more intense development around some stations.

**H.** The passage of SB1377 in 2019 mandates that cities in Washington State *must allow* an increased density bonus for any affordable housing development located on property owned by a religious organization.<sup>10</sup> While this law excludes non-profit owned property the City of Bellevue Planning Department has expressed their intent to extend this benefit to non-profit entities through their current work to advance the C-1 Strategy.

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<sup>10</sup> SB 1377 passed by Washington State Legislature in 2019 Regular Session.

# **DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application**

## **BLOCK 4b**

**A.** The proposed rezone, consistent with a Comprehensive Plan Amendment approval would provide additional appropriate density for development of new permanently affordable housing units. It is consistent with Comprehensive Plan Policies in the Land Use, Housing, Transportation and Economic Development:

- LU-6      Encourage new residential development to achieve a substantial portion of the maximum density allowed on the net buildable acreage.
- LU-15     Provide, through land use regulation, the potential for a broad range of housing choices to meet the changing needs of the community.
- LU-21     Support development of compact, livable, and walkable mixed-use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads.
- HO-7      Encourage the development of affordable housing through incentives and other tools consistent with state-enabling legislation.
- HO-21     Address the entire spectrum of housing needs, including the need for housing affordable to very low, low, and moderate-income households, through the city's affordable housing programs.
- ED-16     Encourage development of a range of housing opportunities to accommodate Bellevue's growing workforce
- TR-7.1    Ensure that land use changes near high capacity transit stations are consistent with the Comprehensive Plan, recognizing that transit may support more intense development around some stations.

**B.** In adopting Bellevue's Affordable Housing Strategy in June 2017, the City Council recognized that it is critically important to provide a safe, healthy and affordable place to live for people of all income levels in order to sustain Bellevue's livability and economic vitality.<sup>11</sup>

Increasing density for new affordable housing units at the Glendale site directly implements the following actions in the Affordable Housing Strategy:

- C-1      Increase development potential on suitable land owned by public agencies, faith-based, and non-profit housing entities for affordable housing.

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<sup>11</sup> Bellevue Planning Initiatives, Affordable Housing Strategy home page

## **DASH / Glendale & Evergreen Court Affordable Housing Development Comprehensive Plan Amendment Application**

- C-2      Develop affordable housing on suitable surplus lands in proximity to transit hubs.
- C-4      Inclusionary zoning: Increase zoning as an incentive to provide affordable units in new development.
- D-3      Change the city's approach to density calculation in multi-family zones to allow more flexibility in unit size and type.

**C.** DASH believes the proposed zoning classification is appropriate for reasonable development of the subject property. The draft policy recommendations of the Wilburton Citizen Advisory Committee recognize "affordable housing as the initial and primary public benefit." And they recommend a change to the land use regulations in their neighborhood to "allow the use of floor-area-ratio standards rather than dwelling units per acre;" and "using density bonuses to strongly incentivize housing affordable to people earning 80% or less of the area median income."<sup>12</sup> The Glendale site is within the Wilburton neighborhood, adjacent to the Wilburton study area, and is served by rapid transit, it is reasonable to request application of the same policies to this site.

**D.** The rezone will not be materially detrimental to uses or property in the immediate vicinity of the subject property.

**E.** The rezone has merit and value for the community as a whole by providing additional permanently affordable apartment units in the City of Bellevue.

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<sup>12</sup> MEMO: Wilburton CAC 12/7/2017