

## Land Use Application #856195 - HQ

[illegible]



## CITY OF BELLEVUE



### Land Use Application #856195 - HQ

#### Project Contact

**Company Name:** American Property Development

**Name:** Sean Thorson

**Email:** sthorson@acg.com

**Address:** 15 Lake Bellevue DR 200  
Bellevue WA 98005

**Phone #:** 4252400731

#### Project Type

Multifamily Residential

#### Activity Type

Code or Plan Amendments and  
Interpretations

#### Scope of Work

Comprehensive Plan Amendment

**Project Name:** HQ

**Description of Work:** This application is for a Comprehensive Plan Amendment and Zoning Change

#### Project Details

##### Site Information

Site Specific

##### Customer Feedback

No, I am not willing to share my feedback through an  
online survey



September 11, 2020

Sean Thorson  
Acquisitions Manager  
American Property Development  
15 Lake Bellevue Dr., Suite 200  
Bellevue WA 98005  
[sthorson@acq.com](mailto:sthorson@acq.com)

SUBJECT: Intake Application letter for proposed 2021 Comprehensive Plan Amendment application, APD, 15 Lake Bellevue Dr.

Mr. Thorson:

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 to your property at 15 Lake Bellevue Drive which is designated BelRed-General Commercial (BR-GC), a land use designation in the BelRed Subarea that provides for a wide variety of business activities that provide goods and services to other businesses and the general public. The city would look to the applicant of a privately-initiated 2021 proposed plan amendment to tell us what you think you should amend to—it would, in any case, be another BelRed designation.

Please note that your property is located both within the area of the BelRed Look Back and the Wilburton Land Use Study. These comprehensive planning [initiatives](#) are efforts (respectively) to review the intended success of the adopted BelRed Subarea Land Use Code regulations, and develop policy and code arising out of the Wilburton Land Use Study Citizen Advisory Committee recommendations.

Both efforts await City Council direction to get them underway, and their review and completion work is subject to Council prioritization decisions. The initiatives will provide long-range guidance, adopted into the Comprehensive Plan, for these redeveloping areas. As such, it is possible that any privately-initiated, site-specific comprehensive plan amendment decisions in these combined areas would be deferred until the BelRed Look Back and Wilburton Study programs are completed, with policy and code recommendations adopted.

September 11, 2020 2021 intake application letter

This deferral done within the 2021 annual plan amendment process would restrict your ability for three years to make a separate, site-specific application again.

You also indicated that you had spoken with Joe Van Dyk, Strategic Planning Manager and that a resolution of the colocation of your property within BelRed and within Wilburton Study area boundaries would be an intent of that latter process.

### Analysis

The BelRed Subarea Plan applies to this site. Policies applicable to this site include but are not limited to:

- POLICY S-BR-6. Concentrate the majority of future Bel-Red growth into a series of mixed use, pedestrian-friendly and transit-oriented development nodes, with higher density and height therein, as enabled through a land use incentive system. Within each node, provide for tiered building heights, with maximums at the center
- POLICY S-BR-8. Encourage mixed use development, promoting opportunities to live, work, shop, and recreate within close proximity.

For Land Use Areas Outside of Nodes: Area South of NE 12th Street and Contiguous to Lake Bellevue:

- POLICY S-BR-96. Provide for retail, commercial, and residential uses in this area. Allow maximum building heights up to 45 feet in this area.

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.

Please let me know what else we can provide.



Recoverable Signature

**X** Nicholas K Matz

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



## Comprehensive Plan Amendment

Application Date 9/1/2020

Application Name 15 Lake Bellevue

Applicant Name American Capital Group

Applicant Address 15 Lake Bellevue Dr Ste 200 Bellevue, WA 98005

Applicant Phone 425.709.7242 email dsinnett@acg.com

Agent Contact Sean Thorson

Agent Contact Address 15 Lake Bellevue Dr Ste 200 Bellevue, WA 98005

Agent Contact Phone 425.240.0731 email sthorson@acg.com

☒ 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 398652-0030

Proposed amendment to change the map designation from existing BR-GC Retail  
to proposed BR-OR Node 2

Site area (in acres or square feet) 121,753 square feet

Subarea name Bel Red/Wilburton

Last date the Comprehensive Plan designation was considered 2009

Current land use district (zoning) BR-GC

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.

We would like the opportunity to amend the comprehensive plan from BR-GC Retail to a BR-OR (node 2) designation to support construction of a new mixed used development and a pedestrian oriented street level.

\* Comprehensive plan language requiring amendment in addition to the new BR-OR2 designation:

Area South of NE 12th Street and Contiguous to Lake Bellevue  
POLICY S-BR-96. Provide for retail, commercial, and residential uses in this area.  
Allow maximum building heights up to 45 (change to 150) feet in this area.

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

Last date the Comprehensive Plan policy or text was considered 2009

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.

The vision for the Bel Red area as we understand it is a transition from downtown to the more suburban areas of Bellevue. We would like the opportunity to contribute and expand on that vision by taking our underutilized parking lot and creating a bustling street level experience in support of our proposed redevelopment. Our development would be approximately 15 floors. Consisting of up to 12 floors of apartment homes with sufficient secured parking, and retail or commercial space at street level. The parking and development itself will support the adjacent office buildings, businesses, and the light rail. All within walking distance to downtown Bellevue, the Spring District Light Rail, Grocery Stores, and local businesses.

Bellevue has an urgent need for all types of housing, given the job market is anticipated to gain more than 51,800 more jobs by 2035. The Comprehensive Plan states it is further anticipated that the City of Bellevue will require at least an additional 15,800 housing units in that same time period. We would like to contribute to the needs of the City with our new development, offering much needed housing, jobs, commercial/retail spaces, and better connecting downtown to the Bel Red and ultimately the Spring District Neighborhoods.

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 20.30I.140 (refer to Comprehensive Plan Amendment and Procedures Guide). Submit additional pages as PDF.

\*Please see attached Exhibit A.

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 \_\_\_\_\_

*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 *David Smith* Date *9/14/2020*

Owner or Owner's Agent

# Exhibit A.

## 20.30I.140 Threshold review decision criteria.

The Planning Commission may recommend inclusion of a proposed amendment to the Comprehensive Plan in the Annual Comprehensive Plan Amendment Work Program if the following criteria have been met:

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

Our proposal is appropriately addressed through the Annual Comprehensive Plan Amendment process because the Comprehensive Plan as it is now directly limits our ability to build our proposed development. By not supporting residential development and a height limit that is more consistent with other areas in Bel Red. Our development scope is supported through City funded studies and reviews of the Bel Red and Wilburton neighborhoods.

B. The proposed amendment is in compliance with the three-year limitation rules set forth in LUC [20.30I.130.A.2.d](#); and

This area has not been reviewed since 2009. During the last 11 years Bellevue has seen substantial growth. As Bellevue continues to attract additional large employers and small businesses, housing needs will be even greater.

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 City's internal review of this property may be more inclined to lean towards a zoning or comprehensive plan amendment that is not likely to support the scale we require for our development. Therefore, we feel the Annual Comprehensive Plan amendment process is the appropriate pathway to this developments success.

D. The proposed amendment can be reasonably reviewed within the resources and time frame of the Annual Comprehensive Plan Amendment Work Program; and

We are requesting an overall relatively minor change. Primarily increasing the restrictive height limitations and allowing high density residential/mixed use of the site. The appropriate zoning is already surrounding our property. Including this property in the BR-OR2 should be easily accomplished within the allotted timeframe.

E. 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](#) for the definition of "Significantly Changed Conditions"; and



## Exhibit A.

The construction of Sound Transit's Light Rail station in the Spring District which is a short walk from our property constitutes a significant change since the area was last reviewed. Amazon has also recently announced moving 25,000 jobs to Bellevue and it is anticipated that we will continue to see unprecedented growth of nearly 60,000 new jobs in close proximity in the near future. Supportive housing is now an urgent need.

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

Our property is surrounded by commercial and residential buildings. Our proposal would expand on that, becoming a better transition from Downtown to the Spring district. The construction of this development would also provide a better street level pedestrian experience with a plaza and retail space surrounding businesses, the public, and our new residents alike will enjoy.

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, other state or federal law, and the Washington Administrative Code; or

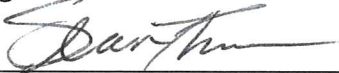
In general the Bel Red sub area is intended to be a transition from downtown to the suburban and residential neighborhoods with an urban feel. Our property is located in a unique location of Bel Red and within walking distance to both downtown and the light rail. This development will make much better use of this great location while in general expanding the goal of the comprehensive plan.

H. State law requires, or a decision of a court or administrative agency has directed such a change. (Ord. 5650, 1-3-06, § 2)

Does not apply

## Signature

*The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.*

Signature 

Name of signee Sean Thorson

Position and Agency/Organization Acquisitions Manager/American Capital Group

Date Submitted 9/15/2020