August 29, 2016

Mr. Terry Bornemann
Bellingham City Council
210 Lottie Street
Bellingham, WA 98225

Re: Accessory Dwelling Units – Comprehensive Plan Update

Hello Terry:

I simply want to provide you with the Sehome Board’s opinion on what has taken place during the month of August in regard to the comprehensive plan update and the accessory dwelling units (ADU) portion of the plan.

First, the action by the Council committee taken on August 1st to remove the “owner-occupied” requirement from the comprehensive plan is completely wrong for two reasons: 1) in any comprehensive plan update process, a significant action like this is not without a full review; 2) that move was completely contrary to planning staff notes and Planning Commission recommendations on Policy H-7. This after extensive public input.

Specific comments on the ADU portion of the update were provided to the City Council on March 29th. (see attachment). The Planning Commission’s recent recommendations sent to the Council on ADUs are nearly the same as to what was presented by Sehome:

- Evaluating and **inventorying** ADUs in the City;
- Identifying appropriate areas for detached ADUs;
- Improving permitting and enforcement; and
- **Requiring owner-occupancy in single-family zones.** (my emphasis)

While this is not the final reading of this action to remove the owner-occupancy standard, the full Council must have a revote on the action that removes it. Without correction of this point, the efforts of the neighborhood’s boards and individuals, and the PCD staff, will have been wasted. Correct that poor decision so that efforts can proceed to other portions of the update that need attention.

Finally, your personal comments on recent actions of Council member(s) towards the commenting general public is much appreciated. As generally stated at the beginning of every council meeting, there must be civility exhibited. If not, the general public will further divorce themselves from these public processes.

Sincerely,

Tim Hostetler, President
Sehome Neighborhood Association Board
March 29, 2016

Mr. Rick Sepler, Director
Bellingham Planning and Community Development
City of Bellingham
210 Lottie Street
Bellingham, WA 98225

Re: Comprehensive Plan Update Comments: Accessory Dwelling Units

Dear Mr. Sepler:

The following are specific comments from the Sehome Neighborhood Association (SNA) Board on the proposed changes to portions of the comprehensive plan update related to accessory dwelling units (ADU). There are four (4) specific areas of ADUs and their impacts that must be emphasized:

1. Comprehensive Plan Update Process: The Bellingham Municipal Code (BMC) has had a specific ordinance related to ADUs for over 20 years. There has never been an inventory, and thus analysis, of the existing ADUs within the City. The existing City record states there are 2 ADUs within the Sehome neighborhood. Over the last year a number of Board members have walked that portion of Sehome that is zoned single family residence and found over 20 ADU units. We feel that number is low. Proposing ADU amendments to the existing code should not occur until inventory and analysis has been accomplished.

2. Land Use Powers: Very common in the newer, large-lot subdivisions within Bellingham are private covenants. The older neighborhoods like Sehome and York do not have these private controls and must rely on land use ordinance and implementation by the City. Thus, the neighborhood boards, and individuals, must research, and many times contest, land use actions taken by the agencies of the City. Even this is impossible when ADUs are being developed without any concern on necessary permitting, and thus, neighborhood board’s become aware on an ADU after the fact.

3. Neighborhood Character: Throughout the Growth Management Act (GMA) there is reference to retaining the character of neighborhoods. The City has not policed the illegal ADU’s and has not observed, and definitely not evaluated, what actually happens with ADU’s in single family neighborhoods. In dense neighborhoods such as Sehome and York, they create unpleasant parking and noise issues and reduce the percentage of owner-occupied houses within the community. Properties become less attractive as they are maintained only to the minimum, or worse.

4. Housing and Affordability: Many of the ADU’s presently out there were created by landlords (hence the great percentage of illegal ADU’s) who were adding more bedrooms
to their houses. Others may have been left over from an owner-occupied house that was then sold to a landlord who continued to rent the ADU, rather than take it down as required by the code to have property owner residing on the property.

I submitted public comments directly to the Planning Commission at their August 20th meeting, referring to three (3) areas for residential development: expanding of urban growth areas (UGA); building within the already planned urban villages (UV); the infill concept, of which ADU is one component. As I stated at that time: UGAs are a non-starter for many reasons; UVs are already planned for multiuse development and higher density residential and this plan should start with them; ADU’s implementation has been non-existent and there has been no analysis on the impacts they have brought to the neighborhoods.

The Planning staff provided a report in the Commission’s packet at that August 20th meeting, titled, “Affordable Housing and Housing Choices in the Comprehensive Plan”. On page 4 the staff report states, “ensure vitality and character of established residential neighborhoods” (my emphasis). Preceding this staff statement was reference to the intent of the GMA on that topic neighborhood integrity. Additionally, on that same page, staff stated, “The updated plan will need to include a new inventory”. On page 5, the report referenced VB-27, which states, “Density bonuses for well-designed housing that compliments existing neighborhood integrity [...]”. Again, my emphasis, but to the point there needs to be an inventory and analysis to determine what is appropriate for ADUs in the single-family neighborhoods.

Sehome, as a community, recognizes the need for more rental housing and we strongly supported the Samish Way Urban Village Subarea Plan. As a result, currently going through the permitting process is a 5-story apartment building on Consolidation and the Bellingham Housing Authority proposal for the Aloha property redevelopment. Unlike these higher density housing proposals, ADU’s do not contribute much to the overall number of housing units, but destroy the nature of single family zones.

Without adequate controls and appropriate implementation (i.e., unlike the current state of ADU process(es)), ADUs are simply a method being deployed to break up single family zoning and create multi-family units, and thus to destroy the nature of the neighborhood.

While not totally against the general ADU concept, we are totally against the way this comprehensive planning process has proceeded in regard to ADUs and comprehensive planning.

Sincerely,

Tim Hostetler, President
Sehome Neighborhood Association Board

cc: City Council
MNAC Board