



May 20, 2021

Bellingham Planning Commission
210 Lottie Street
Bellingham, WA

RE: RM Zone Project, Draft Ordinance

Dear Commissioners,

My name is Carrie Veldman of The RJ Group – a local real estate development firm. I would like to advocate my support for the RM Zone Project. Overall, I believe this update will simplify zoning code but also foster density outlined in our Comprehensive Plan. Whether we are in a housing crisis or not, this update will be beneficial to pursue our vision to grow as a City.

I have been working with City staff to understand what this update entails for our properties. I understand the purpose of the draft ordinance is to obtain higher densities in areas best suited with robust infrastructure, services, parks, and trails. Area 11 of the Cordata Neighborhood meets all those criteria and is outlined in the draft ordinance to be a 'High Density Residential' area. However, the zoning table language still references the density called out in the Cordata PUD. This governing document states Area 11 is designated with only 18 units per acre. This particular area has no traffic issues, critical areas have been solved and successfully mitigated for, and is adjacent to Cordata Park and a mixed-use commercial zone. To best serve the mixed-use commercial area, higher density is needed in and we would like the opportunity to explore what we can achieve with more density.

My request to the Planning Commission is to recommend to City Staff that the zoning table language should be revised to be consistent with the remaining RM project updates and reflect a 'High Density Residential' designation for Area 11 of the Cordata Neighborhood.

If you have any questions, please contact me directly.

Thank you for your consideration.

Carrie Veldman

Carrie Veldman

CC: Kathy Bell
Kurt Nabbefeld

May 18, 2021

Bellingham Planning Commission member
210 Lottie Street

Dear Planning Commission Member:

We have been following the Planning Staff proposed change to the RM Zoned areas since the Staff requested an emergency moratorium to stop single family development in RM zones (except under specific conditions). We have expressed our concerns both directly to staff and with public testimony. As one of the landowners and housing providers in the City of Bellingham we have recently seen the current emergency moratorium greatly reduce our ability to provide housing and we feel the proposed ordinance as written would further reduce our ability to provide much needed housing to families in Bellingham. We have outlined our concerns below and included real world examples.

Concern # 1: 25% maximum number of detached single-family units

Page 27, line 6.B “The development of detached single-family dwelling unit is allowed within an area having a residential multi general use type only under the following provisions:

1. The number of detached single-family dwelling units does not exceed 25% of the total number of units proposed for a development. The 25% shall be based on the minimum density specified in the applicable neighborhood subarea zoning table in BMS 20.00”

We believe this section is unnecessary for the following reasons:

1. **The goal is density-** The purpose of the revisions to the residential multifamily code is to address the areas of RM zoning that have been significantly underdeveloped. Staff was directed to leave “no stone unturned” to achieve densities intended in the Bellingham comprehensive plan. This problem has been corrected by specifically creating minimum density (pages 34-36). The Developer or Builder needs the flexibility to determine based on market demand, financing and other factors the best mix of housing types necessary to achieve the minimum density; the specific housing form is irrelevant if the minimum density has been met. If the goal is to have 6 units on one acre that can be achieved by 6 townhomes, or 6 apartments, or 6 single family homes, etc. Attached as exhibit A is an example of both townhomes and detached single family homes meeting this density requirement. Under the proposed revision the single-family homes would NOT be allowed despite meeting the density requirement. If the goal is density, it should be allowed in all forms.

2. **Low housing supply needs to be solved with more flexibility, not less-** The density problem in Bellingham can be solved without eliminating or capping single family homes and still provide multiple housing types. Attached as exhibit B is a proposed plat that has 205 multifamily units, 16 garden court units, and 89 single family homes: totaling 310 units. This plat is another example of using single family to achieve the intended comprehensive plan density and would achieve 10 units per acre; but it would not be permitted under the proposal because 28% of the units would be single family.
3. **Capping single family incentivizes building more expensive homes-** There is no data showing that 25 percent is the optimal ratio of single family to multi. In fact, surveys taken of both Millennials and Gen Z indicate that 90% or more prefer a detached single-family residence. With future demand still high, a limitation on how many homes can be built will continue to push up pricing. Often the single-family homes are sold to pay for infrastructure costs on a project. If there is a limit on how many can be built the developer will tend to build a higher percentage of larger homes with higher margins to cover infrastructure costs. In the long-term this will further constrict the supply of more affordable detached homes and will hurt families that want an affordable detached home.

Starting with the emergency ordinance, Staff has consistently stated “Many areas zoned Residential Multi (RM) have been significantly underdeveloped with densities much less than what is intended in the Comprehensive Plan.” And have stated publicly to the planning Commission and the City Council that the intent is not to prevent single family homes from being built. The minimum density proposal is intended to accomplish this, the percentage language appears to be contrary to this intent.

Concern #2: Minimum density definition

Pages 34 -36 starting at line 14 “Density”

We do not object to the concept of Minimum density, and we are pleased to read that Staff recognizes that all development sites are impacted by factors beyond the control of the Developer or Builder. On page 36 sections B,C,D specifically refer to Critical areas, topography among other things. However, these exemptions are subject to the approval of the Director with or without conditions and are also left to interpretation of what will result in the “highest possible density”.

We believe this section should be revised for the following reasons:

1. **Net minimum density is simple to identify-** The size and location of unbuildable areas are easily identified during the platting process by Staff and are usually listed on the plat or in other documents. (see attached Exhibit B table from a current plat

application). This change will achieve the same goals in Staff's proposal but will help simplify the platting process, allow the Developer or Builder to quickly determine what the minimum density requirement will be (they can still build to gross maximum) and move forward.

2. **Net minimum density is dynamic-** As regulations change over time net density can adapt, gross density can lead to unbuildable sites. If critical area buffers, geological hazard definitions, stormwater requirements, open space requirements, endangered species habitat or road standards change then the use of net density will ensure that parcels are still buildable.
3. **"Highest possible density" language is not clear-** The exception language leaves too much room for interpretation. Attached is an example of a parcel that we are currently looking to develop (Exhibit C). The site is 20 acres and under a gross density calculation would require a minimum of approximately 120 units. There is approximately 4 acres that are available for construction. Under this situation what constitutes the highest possible density? Theoretically you could build all the storm water, roads, mitigation, and parking in a large building with 120 studio units, but that would not be economical and therefore would not be constructed.

Instead, it would be more efficient to bring product on market by specifically identifying critical areas and associated buffers, storm facilities, code required open space dedications, as areas that are excluded from the calculation for minimum density without Director's approval. The Developer or Builder has no control over these areas and the impact can be significant.

Concern #3: Phased Development language

Page 19, line 20 "If the development proposal includes detached single-family residences per this chapter, no more than 50% of the allowed single family detached units shall be permitted in one phase unless approved through a development agreement."

1. **Want clarity on language-** We interpret this section to mean the infrastructure and platted lot must be created for the higher density uses before all the lower density uses are constructed, NOT the vertical construction of the higher density uses. Is this correct?
2. **Want to clarify what would happen if there were utility servicing issues-** If there is a servicing issue, such as fire flow, that is not the responsibility of the developer that needs to be addressed. Would this hold up construction of lower density uses while this is remedied?

Feel free to contact me with any questions you may have.

Thank you for your service to our community.

Sincerely,

Ralph Black

Alliance Properties

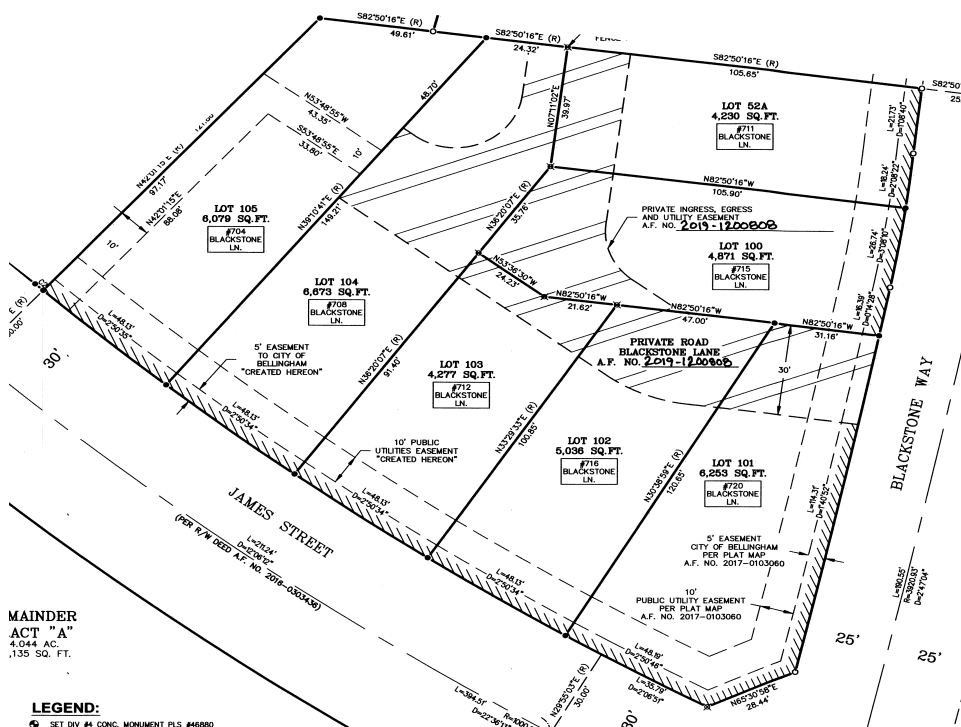
Bellingham, WA

Attachments.

Exhibit A

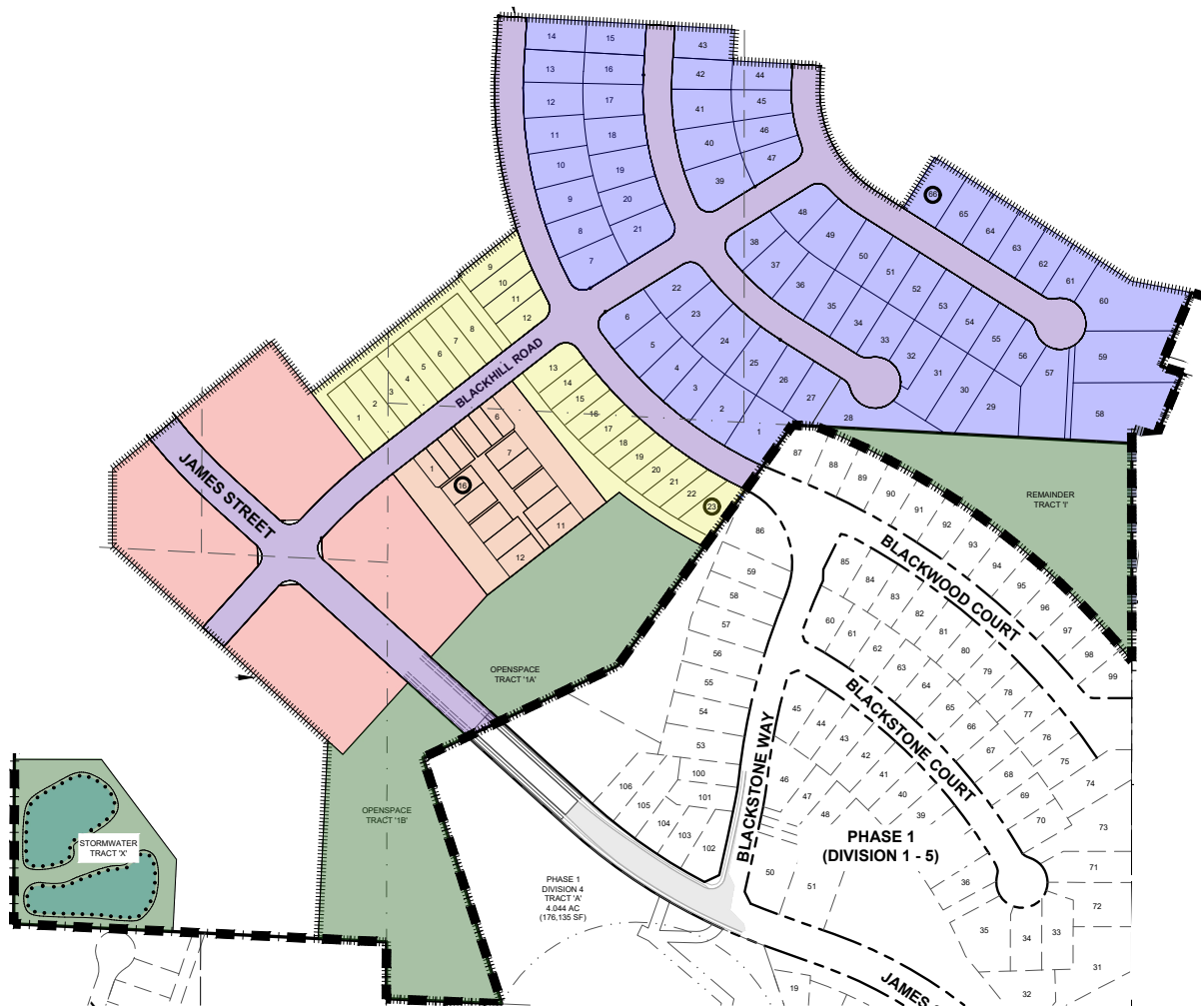


10 Townhouses
 64,057 Total Square Feet
 6,406 Square Feet per Unit, 6.8 units an acre



7 Detached Single Family Homes
 37,369 Total Square Feet
 5,338 Square Feet per Unit, 8.2 units an acre

Exhibit B



The Village at King Mountain - Phase 2						
	Number of Units	Square Feet (SF)	Acres (AC)	Percent (%)	Units/Acre	Lot size (SF)
Multi-Family	205	195,177	4.48	14%	45.75	Varies
Garden Court	16	71,550	1.64	5%	9.74	1700 to 2900
Detached Single Family	23	121,262	2.78	9%	8.26	3000 to 5000
Single Family	66	446,780	10.26	33%	6.43	5000+
Subtotal	310	834,769	19.16	61%	16.18	
Open Space		201,263	4.62	15%		
Remainder Tract		86,593	1.99	6%		
James Street ROW		46,269	1.06	3%		
Dedicated ROW		190,708	4.38	14%		
Total	310	1,359,602	31.21	100%	9.93	

Exhibit C

