

Roger Almskaar

Land Use Consultant

360 671 1324

March 28 2013

Whatcom County Planning Commission
5280 Northwest Drive
Bellingham WA 98226

Re: Proposed Rezoning, North Bellingham "Rural Neighborhood"

Dear Commissioners:

On behalf of Mike Hinson and Mandy Knutson, who own an 8.8 acre vacant parcel in this area, I'm submitting this letter with two exhibits for your March 28 2013 hearing record. They are aware of the current ban on new plat applications due to the state Growth Management Hearing Board's January 4 2013 Invalidity Order. However, they do plan to do a short plat when and if the Hearing Board Invalidity Order on such matters is lifted.

This site is on the north side of W Axton Road, at 5765 Good News Lane, across said lane from Good News Fellowship church, about 0.4 miles west of Northwest Road. Its parcel number is 390222-047068; legal description is Lot 1, Good News Short Plat, recorded December 7 2007. It's location is marked as "1" on the attached "Proposed Rezoning" (Rezone) Map by the County Planning Department (PDS) dated February 27 2013; Exhibit A.

We have reviewed the current PDS materials released March 11 2013 on this issue. We note that the boundaries of the present North Bellingham Rural Neighborhood plan designation and Rural Residential-2 Acre Density (RR-2A) zone are being significantly revised to exclude several medium to large sized parcels. However, our parcel remains within the RR-2A zone, as proposed on the Rezone Map, and is separated from the west boundary of the RR-2A area by other parcels.

We support the inclusion of our parcel within this revised zone and plan designation. While we do not support the downzone of anyone else's' land, as proposed along other portions of the RR-2A zone boundary, we understand that the County is under considerable political pressure to remove a significant amount of developable land from this area. The staff's overall proposal will go a long way to ease the state Hearing Board's obsessed and unreasonable concerns about possible sprawl in this long established medium density rural area.

Please refer to the two exhibits: A: "Proposed Rezone", and B: a table showing all 8 parcels in the reduced RR-2A zone which are 5 "gross" acres or more, with any feasible potential for new home sites. The locations of these lots are numbered on the Exhibit A map. Staff has marked the areas to be downzoned to RR-5A with hatching. Its obvious that a major part of the present RR-2A and Rural Neighborhood area would be removed.

There are also 5 other similarly sized lots: 3 are developed with churches (marked "C", and 2 are developed with mobile home parks ("M"). These 5 lots are not likely to be developed for low density housing in the foreseeable future because of the substantial investments in buildings and infrastructure, and substantial income streams with the mobile parks.

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Exhibit B, the table, indicates the approximate or gross size of the 8 lots, and potential new lot yield. Note that the total potential yield of new home sites (not allowing for use of the density overlay option) is 23, and these lots total about 67 acres. The March 11 staff report estimated a reduction of 30 sites from a total potential of 50, but that included 3 lots of record in an RR 5A area in the SW corner. This table does not include that area.

In past PDS reports, the North Bellingham area was estimated to contain about 900 acres, and 890 dwellings, almost all single family. This proposal reduces the major, RR 2A portion by about 130 acres (or 15%) to about 770 acres.

In conclusion, this major reduction in both potential home site yields and gross area in this Rural Neighborhood proposed here is probably the only solution acceptable to the board. But, to rezone the few remaining larger, that is 5 to 18 acre isolated "interior" parcels like ours, would be what some would call an illegal "spot zone". However, unlike the usual spot zone, the financial outcome in this area would be extremely negative for the owners.

Because all the land surrounding our 8.8 acre lot has already been subdivided into lots much smaller than ours, we believe that retaining the RR-2A zoning is the only reasonable and fair solution for our lot, and for all similarly situated parcels in the subject area.

Finally, the board's harsh criticism of, and "non-compliant" findings for, the County's previous zoning decisions in this area (and Fort Bellingham) as promoting "sprawl" appears to completely disregard one of the 5 well established factors in professional land supply analysis, ie: the "availability" factor. Even in most dense, older urban areas in our country, there is always a significant portion of vacant or re-developable land, not dedicated long term to other uses that is not available at present for allowed development, at any reasonable price.

This variable often accounts for up to 15-20% of an area's land base. The reasons are diverse: economic, personal, etc. The other 4 factors are: regulation (zoning etc); infrastructure availability; land needed for public/quasi-public uses (streets, parks, churches); and "market forces" (such as "parcelization", grandfathered income properties, adjacent blight, developer marketing decisions etc).

Thanks for your kind consideration of this testimony. Please contact me if there are questions or comments.

Sincerely,


Roger Almskaar, Land Use Consultant

Exhibits:

- A. Proposed Rezoning Map; 8.5x11"
- B. Developable Parcels... RR-2A; 8.5x11"

cc: clients, PDS

Roger Almskaar, Land Use Consultant

Exhibit B

Developable Parcels 5 Acres and Larger *

Proposed RR-2A Zone

Section, Parcel #	Approx. Acres	Potential New Home Sites **
1. Sec. 21, # 500027	9 acres	3
2. Sec. 22, # 047068	8.8	4
3. Sec 27, #331502	5	1
4. Sec 27, # 377502	5	1
5. Sec 27, # 088408	11.6	3
6. Sec 27, # 129183	18.4	8
7. Sec 27, # 195107	6.4	2
8. Sec 34, # 212466	<u>4.5</u>	<u>1</u>
Totals: 8 parcels	67.9 acres	23 sites

* per "Proposed Rezoning" Map by PDS, 2/27/13

** assume short plat per proposed RR 2A zoning

From: [Roger Almskaar](#)
To: [Gary Davis](#)
Cc: [Mandy Knutson](#)
Subject: Hinson/Knutson letter
Date: Monday, April 01, 2013 9:49:59 PM
Attachments: [Knutson-letter to WC PC-ra-3 28 "13.doc](#)

Hi Gary, here's a corrected copy, with the subject parcel noted as #2, p1. Could you please replace the posted copy? thanks,

Roger Almskaar, Land Use Consultant
2850 W Maplewood Ave # 104
Bellingham WA 98225-8877
360 671 1324

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