

# Roger Almskaar

Land Use Consultant

360 671 1324

May 21, 2013

Whatcom County Council  
311 Grand Ave  
Bellingham WA 98225

Re: Proposed Partial Downzoning, North Bellingham "Rural Neighborhood"

Dear Council Members:

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 one exhibit for your May 21 2013 hearing record. They do intend to do a 4 lot short plat, and are aware of the continued ban on new plat applications due to the state Growth Management Hearing Board's 2012 and 2013 Invalidity Orders. They will apply when and if the Invalidity Orders on such matters are lifted. We submitted a similar letter March 28 2013 at the Planning Commission's hearing.

We support the proposed retention of the Rural Residential-2 Acre Density (RR-2A) zone for this parcel, per the Planning Commission map for North Bellingham, p 2, Exhibit C. I'm attaching a marked copy, our Exhibit A, on which the site is marked with an asterisk.

The parcel 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, and 0.5 miles east of the city limits of Ferndale. Its parcel number is 390222-047068; its legal description is Lot 1, Good News Short Plat, recorded December 7 2007.

The site is not on the exterior western boundary of the North Bellingham Rural Neighborhood; there are several considerably smaller parcels in between. Also, all the land surrounding our 8.8 acre lot has already been subdivided into lots much smaller than ours, and most lots have houses (or a church) on them. For these reasons, we believe that retaining the RR-2A zoning is the only reasonable and fair solution for our lot, and for the few other similarly situated parcels in the subject area.

In conclusion, the major reduction proposed in both potential home site yields and gross area in the entire Rural Neighborhood 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 "upzone", the financial outcome in this instance would be extremely negative for the owners.

Looking at the bigger picture, 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 "availability", one of the 5 well

established factors in professional land supply analysis. 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 are: 1) regulation (zoning etc); 2) infrastructure availability; 3) land needed for public/quasi-public uses (streets, parks, churches); and 4) "market factor" (such as "parcelization", grandfathered income properties, adjacent blight, developer marketing decisions etc).

One has to wonder if the board's failure to consider this major land supply factor in their analysis of these two large and important rural areas was intentional, or due to lack of knowledge.

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

Sincerely,

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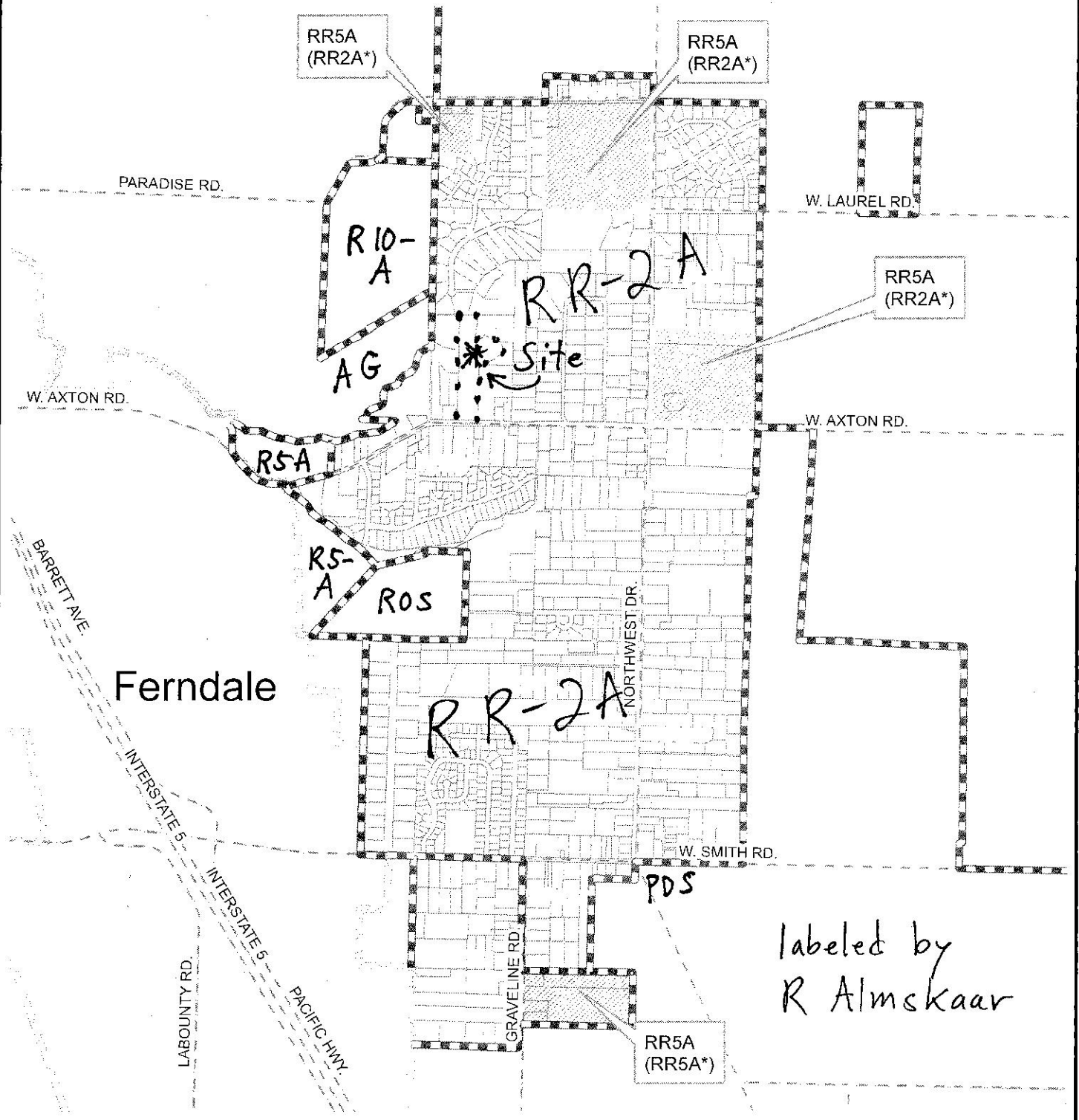
Roger Almskaar, Land Use Consultant

**Exhibits:** A. Planning Commission's Proposed Rezoning Map, dated 4/16/13; 8.5x11"

cc: clients, Planning Department

Exhibit C: PC Recommendation

# North Bellingham



labeled by  
R Almskaar

File #: PLN2012-00012

### Proposed Rezoning (PC Recommendation)

- Existing Zoning Boundary
- Proposed Zoning Boundary
- Proposed Rezone Area

\* Rural Residential Density Overlay  
 Proposed Zoning - RR5A (not in parentheses)  
 Existing Zoning - (RR2)

THE CITY OF BELLINGHAM, WASHINGTON, HAS REVIEWED THE CITY CLERK'S RECOMMENDATION FOR THE PROPOSED REZONING OF THE PROPERTY DESCRIBED IN THE ATTACHED MAP. THE CITY CLERK'S RECOMMENDATION IS BASED ON THE CITY CLERK'S REVIEW OF THE CITY CLERK'S RECORDS AND THE CITY CLERK'S REVIEW OF THE CITY CLERK'S RECORDS.

