

To: Bellingham City Council

September 14, 2017

From: South Hill Neighborhood Association

CC: Mayor Kelli Linville
Planning Commission

Subject: ADU Ordinance

The South Hill Neighborhood Association (SHNA) Board and general membership met on September 6, 2017 to discuss South Hill's position on the proposed ADU ordinance update. This memo was approved by the membership at the meeting.

The SHNA has been consistently commenting on ADU applications, and been instrumental in updating the current ordinance for the last 12 years. We have taken active positions on the Comprehensive Plan (October 7, 2016), and provided comments to modernizing the old ordinance in light of the South Hill having reached its maximum number of 20 units, triggering the current update.

We are one of Bellingham's older neighborhoods, which means that South Hill does not have protective covenants to protect our neighborhood character. We depend on the Mayor and City Council, our neighborhood plan, and zoning tables to protect our neighborhood character. We do wish to maintain the single-family character of our neighborhood, and support allowing attached ADU's, (A-ADUs) as currently provided in the outdated 1990 ordinances.

We support including the following requirements for any updated ADU ordinance.

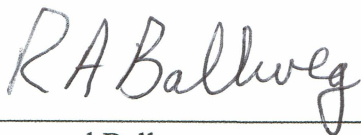
1. **Owner Occupancy** for all Attached ADU's (A-ADU's) including those which are not currently registered. Removing this current provision would enable real estate speculation and the creation of a neighborhood of rentals, "duplexes" and rooming houses owned by off-site landlords. Housing stock would be negatively impacted and those seeking home ownership would be forced to buy elsewhere possibly contributing to sprawl.
2. **No Detached ADU's** in Single Family zoned areas unless the neighborhood overwhelmingly agrees to allow their inclusion. Detached ADU's can decrease the current setback regulations, lessen neighbors access to sunlight, decrease green space while increasing runoff affecting water migration and stream flow.
3. **Adequate parking** for every ADU must be provided and emergency access ensured. South Hill has steep hills, narrow streets and alleys. Many streets have legal parking on only one side of the street. Emergency vehicles and Fire departments need reliable, adequate access to ensure the safety of residents.
4. **Mandatory Inventory** of all ADU's including non-registered (illegal) units and assessment of current densities of neighborhoods. The COB has stated that before allowing additional infill in existing neighborhoods, densities of neighborhoods would be assessed. To date, this has not been accomplished.

5. **Enforcement** of well-constructed penalties for noncompliance to building codes and regulations. The "rule of three", rental registration, non-permitted ADU construction are issues that are not currently enforced adequately, sometimes not at all. Without specific penalties and the means of enforcement, there is no incentive for compliance.
6. As **short term vacation rentals** such as VRBOs, Air BnBs, etc. have proliferated and have had a negative impact on the availability of housing for Bellingham residents. A separate and through public process to develop a Policy for Short Term Vacation Rentals (less than 30 days – Air BnB, VRBO, etc.) should be held. Conducting a business is against regulations in all Single Family Zoned areas. The business of vacation rentals, which could be providing affordable housing for Bellingham residents, is a contributing factor to the current housing shortage. Include rules for the use of ADU's in the ordinance which could prohibit short term rental of less than 30 days and include the means of enforcement.

The Neighborhood Associations within the City of Bellingham are the key protectors of neighborhood character. In the South Hill, we have worked to protect our single-family zones, and respect the key values which make us a unique neighborhood, such as views, older and historic home styles, and access to the City of Bellingham amenities like shorelines, parks and trails. We support diverse and vibrant neighborhoods, and we welcome future neighbors to the South Hill.

We are concerned that pitting single family home owners that value their existing neighborhoods with those families that are struggling to find a safe and affordable home in Bellingham is a disservice to all residents of Bellingham. We categorically reject the allegation that supporting single-family zoning is "exclusionary" and part of our "purported legacy of exclusion" towards lower income citizens, students and minorities. We ask the City of Bellingham to recognize that the SHNA welcomes infill and affordable housing, consistent with our current zoning plans, and we cherish the character and diversity of our neighborhood. We welcome all future neighbors.

Signed



Raymond Ballweg
Acting President,
South Hill Neighborhood Association



Jane Bright
Vice President
South Hill Neighborhood Association