



MEMORANDUM

DATE: April 10, 2023
TO: **Mr. Skip Jansen**
East Harbor Hills, LLC
FROM: Craig Parkinson
SUBJECT **Manufactured Home Park – Minimum Land Requirement**
:
ALTERNATE PLAN TO LIMIT MAX DENSITY TO PARK ONLY
PROJECT JANS0018
:
COPIES: Stacie Pratschner – City of Blaine Community and Development Services

Skip –

As you are aware, City staff commented that the Plan and memo presented on April 6th showed more density than would be allowed in a stand-alone Manufactured Home Park (MHP). Because the code is written not around lot number or lot size, but *total minimum area* for a Manufactured Home Park, this point is relatively insignificant as it relates to the discussion regarding what minimum area is required to construct a code-compliant MHP. Regardless, this memo is similar to that created last week, but shows what would be required for a stand-alone, code-compliant MHP that *also* adheres to maximum density requirements. The previous memo may be discarded, and is replaced with this memo.

Our conclusion remains the same, that it would be impossible to develop a Manufactured Home Park in compliance with current City Code on a property of five acres or less in size.

Similar to the memo produced last week, the narrative below includes the Code citation, a brief description of how that citation must be interpreted, a summary of the minimum area required to meet the requirement, and a brief statement on what effect this has on the total area required as graphically presented in the attached schematic. The summary at the end adds some other facts that should be considered.

Site Area

BMC 17.116.050.B - Site Area

1. *The minimum site area of a manufactured home park shall be three acres, excluding the area used for open space, common space, and recreational use.*

Because of the staff comment regarding density, and for illustrative purposes, the “lots” have been adjusted to provide for 4-unit per gross acre density within the bounds of the hypothetical MHP. The area for lots is limited to exactly three-acres, the *minimum area required by code*. “Common space” includes the shared roadway tract, shared parking, perimeter buffer, Open Space, area required for stormwater facilities and the required storage area. Note that upon review of our memo dated April 6th, staff commented that the roadway tract may or may not be considered a “common area”. In our opinion, a private road tract, containing a private road, to be maintained by the MHP operator, for use by all residents of the MHP cannot be considered anything *but* a common element of the MHP, similar to recent single-family plats within Blaine that contain private roads and where these roads and tracts are defined as “common elements”. For this reason, the roadway tract area is excluded from the three-acre minimum site area.

[Effect on Overall Development Area: None.]

Pad Dimensions

BMC 17.112.020.A

1. *(The Manufactured Home itself) Is comprised of at least two fully enclosed parallel sections each of not less than 12 feet wide by 36 feet long; and*

BMC 17.116.060 – Standards for development on individual lots

Setbacks – minimum 10-foot front, 5-foot side and 5-foot rear.

Lot Coverage - <50%

A Minimum Lot size can be determined from the above citations. The Manufactured Home itself cannot be less than 864 square feet. With minimum setbacks, the “lot” can therefore not be less than 1,734 square feet. This would also meet the coverage requirement. A requirement for a minimum of two parking spaces of 10-feet by 20-feet makes the absolute minimum “lot” size 2,134 square feet. From a practical standpoint, a minimum “lot” size of 3,000 to 3,500 square feet is more realistic. For illustrative purposes, the attached figure shows 5,940 square foot “lots” in order to maintain the maximum allowed density (without bonuses) within the confines of the hypothetical MHP. Smaller lots could be used, but if density exceeds the maximum, then additional perimeter

buffering or open space would be required to maintain maximum density, resulting in even more overall area being required. Again, because this exercise is being pursued to demonstrate the minimum area required to construct a MHP, the lot area has been shown as larger rather than expanding the required area by including more open space.

[Effect on Overall Development Area: None]

Perimeter Buffer

BMC 17.116.050.C

1. *A manufactured home park must establish a 20-foot buffer along all perimeter property lines.*

Other code citations within this section state that the perimeter buffer area *may* count toward the open space requirement “*if the city finds that it is suitable for that purpose*”. Because a true, landscaped perimeter buffer would not provide recreational opportunity, it is doubtful this ruling would be made. However, if it were, and because a minimum of 15-feet must be heavily landscaped to provide a 75% opaque vegetative screen, the most the attached schematic minimum required area could be reduced would be 0.20 acres, representing the five-feet that is not required to contain the robust screening vegetation. Even with this reduction, this keeps the minimum required area to meet all other code requirements above the five-acre minimum thereby requiring a MHP to be developed under a PUD.

[Effect on Overall Development Area: None – unless the 5-feet of buffer that is not heavily landscaped is allowed to be counted toward open space. In reality, perimeter buffering would likely be increased in some areas]

Access and Circulation

BMC 17.116.050.D

3. *Those streets the public works director determines may be private streets shall meet the following minimum standards:*
 - a. *Right-of-Way. All interior park roads shall be constructed within a right-of-way, which shall be sufficient to construct and maintain the roadway plus a provision for utilities, but in no case shall be less than 30 feet in width.*

b. Pavement Width. Park roads shall have a minimum paved width of 30 feet, including the area improved with curbs and gutters. Cul-de-sac turnarounds shall have a minimum paved diameter of 76 feet.

It is noted that should the roads be deemed public, the required right-of-way would be a minimum of 40-feet. Private roads would allow a smaller area, so this smallest required area is what is included in the attached sketch. It is also noted that the actual roadway tract (or right-of-way) would very likely be more than the minimum 30-feet, so this particular item will therefore likely require more space than the minimum shown, increasing the overall area that much more than the five-acres necessitating the need for a PUD. Right-of-way is not discounted when determining the area of a project, and whether a PUD is required. In addition, the attached schematic shows the absolute most efficient layout of access lanes. These are fully double-loaded, and assume only the bare minimum perimeter buffering to off-site areas. In all likelihood, the actual access lanes will be required to work around other site features (critical areas, topography, etc.) would be larger, making the required minimum area larger than the hypothetical minimum size.

As mentioned above, a private roadway, used exclusively by the MHP residents, maintained by the MHP can only be interpreted as a common element. This interpretation is consistent with other developments in Blaine that have private roads, with those roadways and tracts being defined as being “common elements”.

[Effect on Overall Development Area: None – if anything, wider roadway tracts than depicted would be employed, requiring even more area]

Parking Requirements

BMC 17.116.050.E

- 1. At least two paved off-street parking spaces, located adjacent to each respective manufactured home, shall be provided for each unit.*
- 2. In addition to occupant parking, guest and service parking shall be provided within the boundaries of the park at a ratio of one parking space for each four manufactured home lots.*

On-site parking is discussed above under “Pad Dimensions”, and would contribute to a realistic minimum size pad. Additional (Paragraph 2 above)

parking makes up a minor, and relatively insignificant amount of additional required space.

[Effect on Overall Development Area: None – six parking spaces were eliminated as compared to the memo dated April 6th due to increase pad size, and therefore fewer required parking spaces. In reality, more parking should be provided for guest parking, requiring more area, but for this exercise, only the minimum number of spaces is shown.]

Open Space

BMC 17.116.050.G

- 1. A minimum of 20 percent of the overall development shall be set aside and maintained as open space. Such space and location shall be accessible and usable by all residents of the park for passive or active recreation. Parking spaces, driveways, access streets and storage areas are not considered to be usable open space.*

Open space percentage is to be measured against the “overall development”, meaning the outer limits of the Manufactured Home Park. In the attached schematic, with a total minimum area shown of 5.68 acres, 20% represents a need for 1.14 acres. Useable open space shown is 0.65 acres, meaning that an additional 0.49 acres of open space is required to meet the code citation. Even counting the schematic stormwater tract at 0.27 acres (which is known to be undersized), more open space would be required, increasing the actual minimum area needed for a fully compliant park even greater, further illustrating the need for more than 5-acres and the need to develop this within a PUD.

[Effect on Overall Development Area: None – for the sake of argument, we will assume that the storm pond counts as open space, and 0.24 acres of the 0.81-acre perimeter area would also count toward open space – resulting in an overage of only 0.02 acres as depicted on the attached schematic.]

Storm Drainage

BMC 17.116.050.J

Code requires that storm drainage comply with current regulations. The area shown on the schematic is known to be too small for the proposal as outlined, but is included as an illustrative placeholder. It is reasonable to assume that the drainage facilities for the Manufactured Home Park may be sited within the boundary of the Manufactured Home Park itself. As a result, it is certain that more space would be needed than is depicted, again further illustrating the need for more than 5-acres and the need to develop this within a PUD.

[Effect on Overall Development Area: None – again, for the sake of argument, we will assume that the storm pond is of sufficient size as shown, though we believe it will be larger.]

Storage

BMC 17.116.050.M

4. *A minimum of 300 square feet space of bulk storage shall be provided for every 10 manufactured homes.*

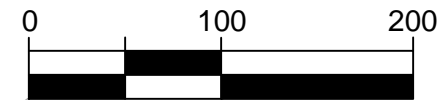
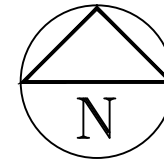
With 22 total lots, we have allocated 600 square feet for RV/Trailer/Boat storage. Again, this is the absolute minimum required by Code, and though this would be woefully lacking, it demonstrates that minimum component required by Code.

[Effect on Overall Development Area: None.]

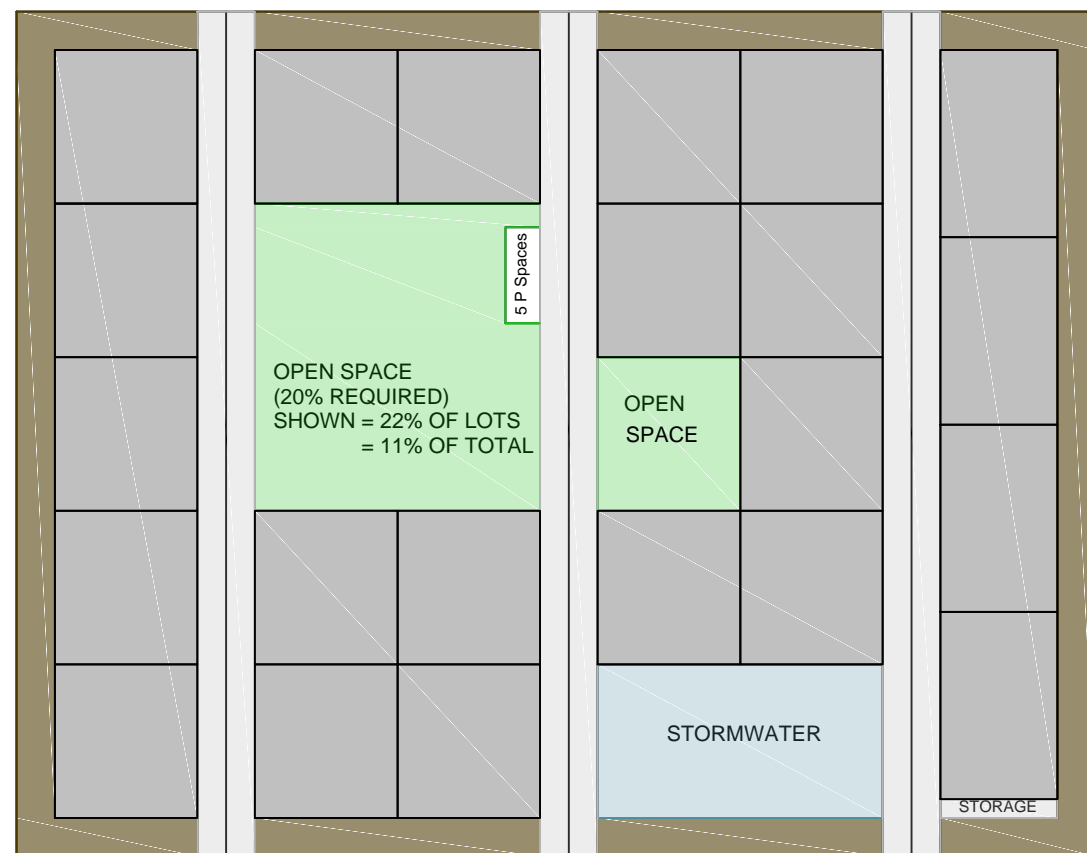
Resulting Minimum Area Required for a Manufactured Home Park:

Having re-evaluated the project based on staff comment, the previous low of 5.86 acres has been reduced to 5.68 acres. This would take every Code criteria to the absolute minimum, and again, is provided to demonstrate that more than five acres is required to construct a code-compliant MHP. As stated previously, much more area would be required to develop a quality park, which is the intent of the developer.

Three additional points are worth noting. First, a cursory review of existing parcels within the Planned Residential (PR) Zone shows that the majority of existing parcels under five-acres in size contain existing single-family homes, and would be unlikely to develop as a MHP, even if it were possible. Second, should someone wish to pursue a lot line adjustment, unless water and sewer were readily available the minimum lot size allowed would be five acres, necessitating the need for a PUD should development of other than one single-family residence also be pursued. Thirdly, because a typical MHP is developed with amenities to be enjoyed by the residents, a minimum number of units must be planned for in order to have the economics of the MHP make sense. All of the above discussion has focused on why a *minimum* of over five-acres is necessary, thus requiring development within a PUD, however BMC 17.116 also allows for a maximum size MHP pointing to how the Code contemplates MHPs larger than five acres in size. In summary, we can only conclude that the discrepancy in Code necessitating the need for a Zoning Text Amendment is the result of an oversight during various code revisions. Approving the requested Zoning Text Amendment will correct this previous oversight,



SCALE IN FEET



MINIMUM PARK AREA = 3 ACRES (BMC 17.116.050.B.1)
("EXCLUDING BUFFER, O.S., COMMON ELEMENTS". COMMON ELEMENTS INCLUDE
OPEN SPACE, BUFFER, ROADWAY, STORMWATER FACILITIES, STORAGE, PARKIKNG)
AREA SHOWN = 130,680 SF OR 3.00 ACRES



MINIMUM 20-FOOT PERIMETER BUFFER (BMC 17.116.050.C.1)
AREA SHOWN = 35,420 SF OR 0.81 ACRES



MIN ROW/ROAD TRACT WIDTH OF 30-FEET (BMC 17.116.050.D.3)
AREA SHOWN = 39,600 SF OR 0.91 ACRES



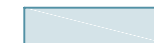
20% MIN OPEN SPACE REQUIRED (BMC 17.116.050.G.1)
AREA SHOWN = 28,116 SF OR 0.65 ACRES



EXTRA PARKING REQUIRED (1 PER 4 UNITS) (BMC 17.116.050.E.2)
AREA SHOWN = 1,584 SF OR 0.04 ACRES



RV / BOAT STORAGE REQUIRED (BMC 17.116.050.M.4)
AREA SHOWN = 600 SF OR 0.01 ACRES



SITE ALSO REQUIRES STORMWATER
AREA SHOWN = 11,880 SF OR 0.27 ACRES

TOTAL MINIMUM AREA SHOWN = 5.68 ACRES

MANUFACTURED HOME PARK
DIMENSIONAL SCHEMATIC

DATE: 04/10/2023
DESIGN: CRP
DRAWN: CRP
CHECKED: CRP

SCALE: AS SHOWN

PROJECT NUMBER:
JANS0018

SHEET NO.

1

OF 1



119 Grand Avenue, Suite D (360) 306-8161
Bellingham, Washington 98225



MEMORANDUM

DATE: April 6, 2023
TO: **Mr. Skip Jansen**
East Harbor Hills, LLC
FROM: Craig Parkinson
SUBJECT **Manufactured Home Park – Minimum Land Requirement**
:
PROJECT JANS0018
:
COPIES: Stacie Pratschner – City of Blaine Community and Development Services

Skip –

Per your request, I have re-evaluated the City of Blaine Municipal Code as it relates to the minimum acreage necessary to construct a Manufactured Home Park. The following narrative outlines the various Code citations, detailing the minimum area required to comply with each portion of the Code. Included at the end of this memorandum is a graphic representation to accompany the narrative.

In summary, we conclude that it would be impossible to develop a Manufactured Home Park in compliance with current City Code on a property of five acres or less in size.

Blaine Municipal Code section 17.116.050 details the requirements that must be met in developing a Manufactured Home Park. Many of these requirements address aesthetic aspects. Only those requirements that result in an aerial requirement to comply with the Code are discussed below. Included is the Code citation, a brief description of how that citation must be interpreted, a summary of the minimum area required to meet the requirement, and a brief statement on how the effect this has on the total area required as graphically presented in the attached schematic.

Site Area

BMC 17.116.050.B - Site Area

1. *The minimum site area of a manufactured home park shall be three acres, excluding the area used for open space, common space, and recreational use.*

It is assumed that “common space” includes the shared roadway tract, shared parking, perimeter buffer, area required for stormwater facilities and the required storage area. The area used for actual Manufactured Home “lots”, or “pads”, shall be three-acres minimum.

[Effect on Overall Development Area: Reduce overall minimum area by 0.03 acres to match 3-acre minimum]

Pad Dimensions

BMC 17.112.020.A

1. *(The Manufactured Home itself) Is comprised of at least two fully enclosed parallel sections each of not less than 12 feet wide by 36 feet long; and*

BMC 17.116.060 – Standards for development on individual lots

Setbacks – minimum 10-foot front, 5-foot side and 5-foot rear.

Lot Coverage - <50%

A Minimum Lot size can be determined from the above citations. The Manufactured Home itself cannot be less than 864 square feet. With minimum setbacks, the “lot” can therefore not be less than 1,734 square feet. This would also meet the coverage requirement. A requirement for a minimum of two parking spaces of 10-feet by 20-feet makes the absolute minimum “lot” size 2,134 square feet. From a practical standpoint, a minimum “lot” size of 3,000 to 3,500 square feet is more realistic. For illustrative purposes, the attached figure shows 3,000 square foot “lots”, measuring 40-feet by 75-feet.

[Effect on Overall Development Area: None]

Perimeter Buffer

BMC 17.116.050.C

1. *A manufactured home park must establish a 20-foot buffer along all perimeter property lines.*

Other code citations within this section state that the perimeter buffer area may count toward the open space requirement “*if the city finds that it is suitable for that purpose*”. Because a true, landscaped perimeter buffer would not provide recreational opportunity, it is doubtful this ruling would be made. However, if it were, and because a minimum of 15-feet must be heavily landscaped to provide

a 75% opaque vegetative screen, the most the attached schematic minimum required area could be reduced would be 0.20 acres, keeping the minimum required area to meet all other code requirements above the five-acre minimum thereby requiring a Park be developed under a PUD.

[Effect on Overall Development Area: None – unless the 5-feet of buffer that is not heavily landscaped is allowed to be counted toward open space. In reality, perimeter buffering would likely be increased in some areas]

Access and Circulation

BMC 17.116.050.D

3. *Those streets the public works director determines may be private streets shall meet the following minimum standards:*

a. Right-of-Way. All interior park roads shall be constructed within a right-of-way, which shall be sufficient to construct and maintain the roadway plus a provision for utilities, but in no case shall be less than 30 feet in width.

b. Pavement Width. Park roads shall have a minimum paved width of 30 feet, including the area improved with curbs and gutters. Cul-de-sac turnarounds shall have a minimum paved diameter of 76 feet.

It is noted that should the roads be deemed public, the required right-of-way would be a minimum of 40-feet. Private roads would allow a smaller area, so this smallest required area is what is included in the attached sketch. It is also noted that the actual roadway tract (or right-of-way) would very likely be more than the minimum 30-feet, so this particular item will therefore likely require more space than the minimum shown, increasing the overall area that much more than the five-acres necessitating the need for a PUD. In addition, the attached schematic shows the absolute most efficient layout of access lanes. These are fully double-loaded, and assume only the bare minimum perimeter buffering to off-site areas. In all likelihood, the actual access lanes will be required to work around other site features (critical areas, topography, etc.) making the layout larger than the hypothetical minimum size.

[Effect on Overall Development Area: None – if anything, wider roadway tracts than depicted would be employed]

Parking Requirements

BMC 17.116.050.E

- 1. At least two paved off-street parking spaces, located adjacent to each respective manufactured home, shall be provided for each unit.*
- 2. In addition to occupant parking, guest and service parking shall be provided within the boundaries of the park at a ratio of one parking space for each four manufactured home lots.*

On-site parking is discussed above under “Pad Dimensions”, and contributes to a realistic minimum size pad. Additional (Paragraph 2 above) parking makes up a minor, and relatively insignificant amount of additional required space.

[Effect on Overall Development Area: None – if pad size were increased to 4,500 square feet, required parking count would reduce required area by 5 spaces, or 0.02 acres]

Open Space

BMC 17.116.050.G

- 1. A minimum of 20 percent of the overall development shall be set aside and maintained as open space. Such space and location shall be accessible and usable by all residents of the park for passive or active recreation. Parking spaces, driveways, access streets and storage areas are not considered to be usable open space.*

Open space percentage is to be measured against the “overall development”, meaning out outer limits of the Manufactured Home Park. In the attached schematic, with a total minimum area shown of 5.86 acres, 20% represents a need for 1.17 acres. Useable open space shown is 0.65 acres, meaning that an additional 0.52 acres of open space is required to meet the code citation. Even counting the schematic stormwater tract at 0.28 acres, more open space would be required, increasing the actual minimum area needed for a fully compliant park even greater, further illustrating the need for more than 5-acres and the need to develop this within a PUD.

[Effect on Overall Development Area: None – for the sake of argument, we will assume that the storm pond counts as open space, and 0.24 acres of the 0.82-acre perimeter area would also count toward open space – resulting in no change to the areas as shown.]

Storm Drainage

BMC 17.116.050.J

Code requires that storm drainage comply with current regulations. The area shown on the schematic is known to be too small for the proposal as outlined. It is reasonable to assume that the drainage facilities for the Manufactured Home Park may be sited within the boundary of the Manufactured Home Park. As a result, it is certain that more space would be needed than is depicted, again further illustrating the need for more than 5-acres and the need to develop this within a PUD.

[Effect on Overall Development Area: None – again, for the sake of argument, we will assume that the storm pond is of sufficient size as shown, though we believe it will be larger.]

Storage

BMC 17.116.050.M

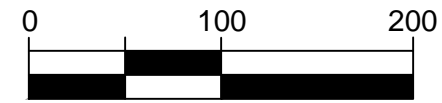
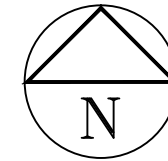
4. *A minimum of 300 square feet space of bulk storage shall be provided for every 10 manufactured homes.*

Assuming a 3,000 average lot size, the schematic as shown would require 0.03 acres of bulk storage area. While this appears to be an unreasonably low number, representing that only 10% of residents would require a parking area for trailers/boats/RVs, the schematic shows a more realistic 0.14 acres of storage. Should this be reduced to the bare minimum, a reduction of 0.11 acres could occur.

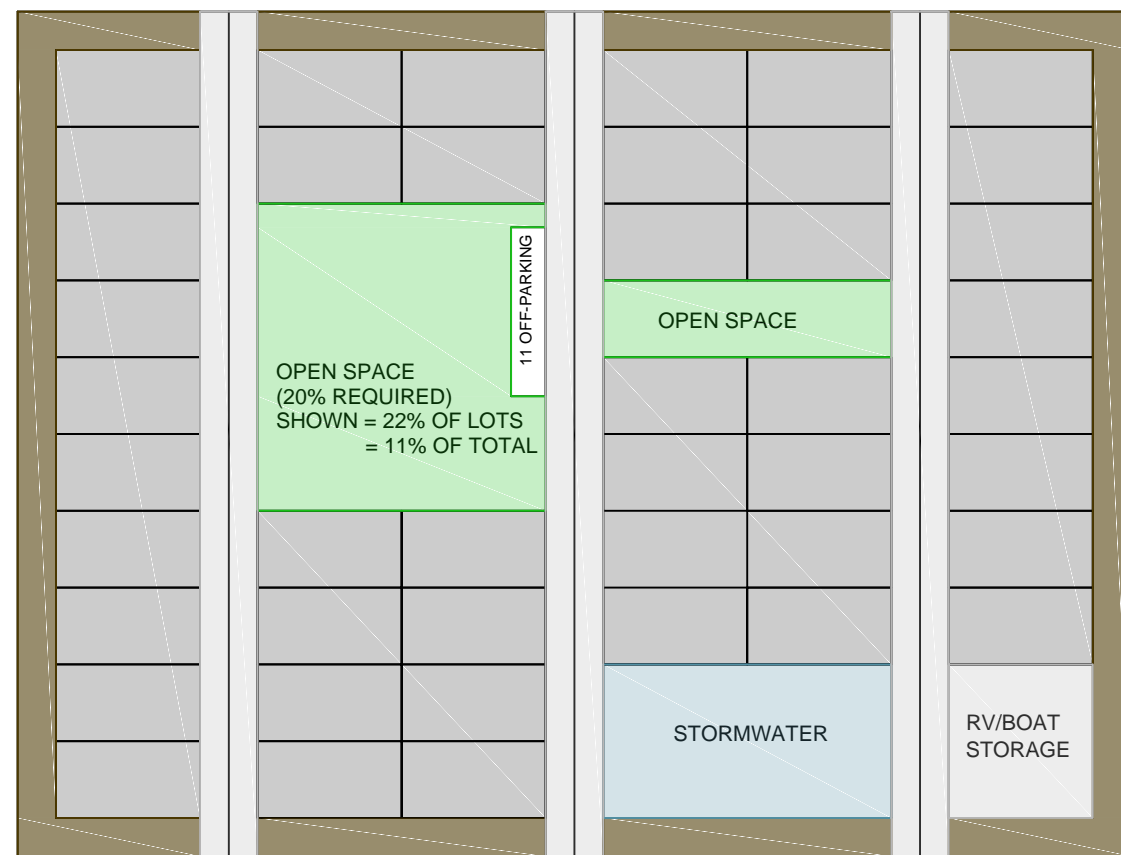
[Effect on Overall Development Area: To be as conservative as absolutely possible, this could be reduced by 0.11 acres as noted above.]

Resulting Minimum Area Required for a Manufactured Home Park:

Taking the above stated reductions from the Overall Site Area, Potential Perimeter Buffer credit toward Open Space, Parking Requirement, and Storage Areas, and ignoring the likely need for additional area for Perimeter Buffer, Access and Circulation, Open Space, and Stormwater facilities, the total minimum area on the attached schematic could be reduced from 5.86 acres to 5.50 acres. Again, this is a bare-bones minimum necessary to develop a Manufactured Home Park that could be deemed in compliance with current City Code. Much more area would be required to develop a quality park, which is the intent of the developer.



SCALE IN FEET



MINIMUM PARK AREA = 3 ACRES (BMC 17.116.050.B.1)
 ("EXCLUDING BUFFER, O.S., COMMON ELEMENTS". COMMON ELEMENTS INCLUDE
 OPEN SPACE, BUFFER, ROADWAY, STORMWATER FACILITIES, STORAGE, PARKIKNG)
 AREA SHOWN = 132,000 SF OR 3.03 ACRES



MINIMUM 20-FOOT PERIMETER BUFFER (BMC 17.116.050.C.1)
 AREA SHOWN = 35,600 SF OR 0.82 ACRES



MIN ROW/ROAD TRACT WIDTH OF 30-FEET (BMC 17.116.050.D.3)
 AREA SHOWN = 39,600 SF OR 0.91 ACRES



20% MIN OPEN SPACE REQUIRED (BMC 17.116.050.G.1)
 AREA SHOWN = 28,416 SF OR 0.65 ACRES



EXTRA PARKING REQUIRED (1 PER 4 UNITS) (BMC 17.116.050.E.2)
 AREA SHOWN = 1,584 SF OR 0.04 ACRES



RV / BOAT STORAGE REQUIRED (BMC 17.116.050.M.4)
 AREA SHOWN = 6,000 SF OR 0.14 ACRES



SITE ALSO REQUIRES STORMWATER
 AREA SHOWN = 12,000 SF OR 0.28 ACRES
 (MORE REQUIRED THAN SHOWN, AREA NOT INCLUDED IN TOTAL)

TOTAL MINIMUM AREA SHOWN = 5.86 ACRES

**MANUFACTURED HOME PARK
 DIMENSIONAL SCHEMATIC**

DATE: 04/06/2023
 DESIGN: CRP
 DRAWN: CRP
 CHECKED: CRP

SCALE: AS SHOWN

PROJECT NUMBER:
 JANS0018



119 Grand Avenue, Suite D (360) 306-8161
 Bellingham, Washington 98225

SHEET NO.
1
 OF 1