



October 18, 2023

VIA EMAIL (cdscomments@cityofblaine.com)

Community Development Services Department  
Attn: Alex Wenger  
City of Blaine Planning Commission  
435 Martin Street, Suite 3000  
Blaine, WA 98230

Subject: Municipal Code Text Amendment  
Letter to Blaine City Council

Dear Council Members:

At the September 25, 2023 Public Hearing regarding the proposed Zoning Text Amendment, I submitted the attached graphic and provided verbal testimony regarding our analysis of land available for development of a Manufactured Home Park (MHP) within the Planned Residential (PR) Zone, which is all of East Blaine. As my time was very limited to present this verbal testimony (five minutes), this letter is submitted to both reiterate and expand upon that earlier verbal testimony.

**SUMMARY:**

In summary, with more detail and backup information presented on the following pages, please consider the following:

- Less than 10% of the PR zone is likely eligible or feasible to make application for a MHP once the moratorium is lifted.
- The concept of splitting East Blaine into two zones, prohibiting MHPs in one part, and allowing MHPs in the other on a “pilot” basis, unnecessarily addresses a problem that does not exist given such a small area that could potentially be developed as a MHP.
- Council’s own action over the past several months, through resolution and ordinance, completes a record that will allow Council to finalize this issue on October 23, 2023 through adoption of Ordinance 23-3005. This adoption resulting in elimination of the code discrepancy, coupled with lifting the moratorium on MHPs, will allow the proponent to move forward with an actual application.

**ANALYSIS:**

As you are aware, as a result of the September 14, 2023 Public Hearing in front of the Planning Commission, the Commission made two recommendations. The first was to simply eliminate the prohibition of Manufactured Homes so as to be compliant with State law. This makes sense and is generally uncontested.

The second recommendation however was to modify BMC 17.68.030.B Table C, similar to what the original citizen request proposed, and that the Council joined on September 11, 2023 (Resolution 1929-23), but to also complete an amendment that would somehow limit the geographic area within the PR zone in which a MHP could be developed. It was stated that this recommended amendment was intended to limit the area in which a MHP might be proposed, offering an opportunity to “pilot” this type of project. It appears that this recommendation is based on the fear that once the text discrepancy is eliminated, there would be numerous MHP applications made, and that without a geographical limitation, the City would be otherwise unable to stem the tide of new MHP applications. We disagree with this premise, and have explained why below.

In my previous testimony I pointed out two basic facts.

1. Since inception of code provisions (BMC 17.116) in 2003 (twenty years ago), we understand there have been no applications made for a MHP and to our knowledge no attempted or contemplated applications other than the one by East Harbor Hills, LLC.;
2. Since first proposing a MHP in the pre-application meeting conducted in November 2021, and after much public exposure through multiple meetings in front of the Planning Commission and Council, and numerous articles and letters within the Northern Light newspaper, no other interested parties have approached the City and made known that they too would be interested in developing a MHP.

East Harbor Hills, LLC is the only potential applicant that has made their wishes known to the City to develop a MHP since the rules were established twenty years ago. There is not a pent-up demand for developing MHPs in East Blaine, suggesting that the Planning Commission’s recommendation to limit the area for MHPs may be an effort to address a problem that does not exist.

We analyzed the parcels within the Planned Residential Zone (East Blaine), as this is the only zone that designates MHP as a “permitted use” (notwithstanding the inconsistency in the PUD code that is the subject of the text amendment application). The entirety of this zone encompasses approximately 1,183 acres and can be classified into four distinct categories as follows:

- A. Properties that are already developed, or have either existing or pending land use approvals. These areas as shown in RED on the attached exhibit. It is very unlikely that properties that are already developed, or that have achieved hard earned approvals for other types of development, will redevelop into a manufactured home park – at least any time soon. Again, this is evidenced by the fact that not one of these property owners have come forward expressing such an interest. These properties represent 614 acres, or 52% of the PR zone;
- B. Properties that are too small to be developed as a MHP meeting the requirements of BMC 17.116. It has been previously determined as fact that a MHP cannot be developed on a parcel of property less than approximately 5.6 acres in size. The BLUE parcels on the attached exhibit are all under that size. It is noted that most, if not all, of these BLUE parcels have single-family homes on them, so even if they were large enough, they too would be unlikely to be developed into a MHP. It is also unlikely that two or more of these parcels, each with different owners, would have a shared vision for a MHP on their property and collaborate on a MHP development. As stated above, the evidence does not support that there is interest by any of these property owners to pursue a MHP. The BLUE parcels as shown represent 176 acres, or 15% of the PR zone.
- C. City owned properties are shown in GREY, and are unlikely to be developed. These properties represent 20 acres, or just under 2% of the PR Zone. Various City rights-of-way are also within the East Blaine area, but have not been quantified.
- D. Properties that appear to be undeveloped, and are large enough to meet the minimum requirements of BMC 17.116 for MHPs. These are shown as WHITE and GREEN on the attached exhibit. The GREEN parcel belongs to East Harbor Hills, LLC, the citizen initiator of the proposed text amendment, and the sole entity inquiring about the ability to make application for a MHP over the past twenty years. This parcel represents 142 acres, or 12% of the PR zone. It is noted that while East Harbor Hills, LLC is interested in making application for a MHP, it would be on only a portion of this property. The WHITE parcels in their entirety represent 230 acres, or 19% of the PR zone. Key to understanding the true potential of a MHP being developed in any of the WHITE parcels is first evaluating the economic feasibility, and/or alternative options available to these parcels. For example, the large square WHITE parcel at the west end of the zone is currently a gravel pit. This ongoing operation makes it highly unlikely it will be developed as a MHP any time soon, if ever. The four WHITE parcels at

the far north in the central portion of the zone have no sewer available. Their size is such that it would likely be infeasible to extend sewer for only their development. The four easternmost WHITE parcels similarly have no utilities available, so almost certainly will not develop in any way for many years, let alone as a MHP, until utilities are extended further east. The remaining seven WHITE parcels total 64 acres, or 5% of the PR zone.

The exhibit also shows known critical areas. For those properties containing this known constraint, their development potential is reduced by approximately 30%. It is reasonable to assume that other properties in the area also contain similar constraints, further limiting their development potential. The end result of this analysis is that even if a third of the GREEN parcel, and all seven of the eligible WHITE parcels were to be proposed for development, this still represents less than 10% of the entire zone. This further reinforces the notion that a "pilot" area resulting from a rezone is unnecessary.

**PREVIOUS COUNCIL ACTION:**

While it is our belief that the Planning Commission's recommendation regarding a pilot zone is an attempt to resolve a problem that does not exist, and that to address the real issues created by the inconsistencies within the code, no further action is necessary other than to adopt Ordinance 23-3005 as recommended by staff. This is evidenced by Council action taken over several previous meetings.

1. On May 22, 2023, the Council passed an emergency moratorium on MHPs (Ordinance 23-2997), in part to allow time for staff to evaluate any other needed changes to the MHP code.
2. On July 10, 2023 the Council held a public hearing to review the May 22, 2023 MHP moratorium. After hearing testimony and deliberating, the Council passed Ordinance 23-3002. Passage of this Ordinance, together with language within Ordinance 23-2997 provided direction to staff in evaluating the scope of any proposed text amendment.
3. On September 11, 2023, Council passed Resolution 1929-23, which had two main points: 1) it joined the City in the citizen proposed text amendment; and 2) satisfied the work plan intended in Ordinances 23-2997 and 23-3002. This resolution was passed in advance of the next public hearing on this topic scheduled in front of the Planning Commission.
4. The Planning Commission held a public hearing on September 14, 2023, and deliberated on the citizen/City text amendment request. Their recommendations (described above) were forwarded to Council, which in turn opted to hold another public hearing on October 9, 2023. The issue was again deliberated, and yet another public hearing was set for October 23, 2023.

**CONCLUSION:**

It is our hope that now, after two years and five public hearings, that the original text amendment request (endorsed and joined by the City Council), can now be approved. This will allow the proponent to make an actual application which of course will be subject to all of the usual process and review of any development application.

Thank you for your consideration. I will be present at the public hearing on October 23<sup>rd</sup> and welcome any questions you may have.

Sincerely,  
CASCADE ENGINEERING GROUP, P.S., INC.










Craig R. Parkinson, P.E.  
Principal Engineer

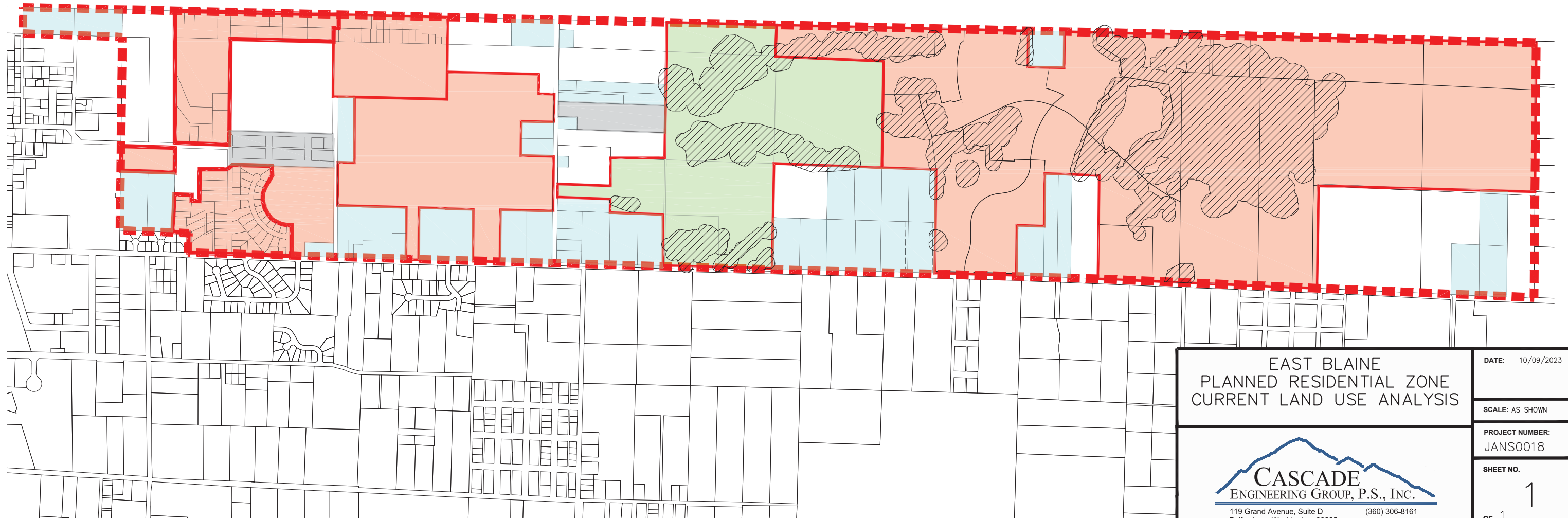
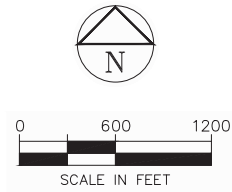
cc: Mr. Skip Jansen, East Harbor Hills, LLC  
Mr. Alex Wenger, Blaine Community Development Services


# East Blaine Parcel Analysis - Planned Residential Zone

October 9, 2023

## LEGEND

-  1,183 Acres East Blaine - Planned Residential Zone
-  614 Acres Parcels that are either developed, or are already in an entitlement process.
-  176 Acres Parcels that are too small to meet minimum requirements for MH Park
-  21 Acres City owned parcels that are unlikely to develop.
-  142 Acres East Harbor Hills Property.
-  230 Acres Remaining parcels potentially meeting criteria necessary to permit a MH Park.
-  Known Critical Areas.



EAST BLAINE PLANNED RESIDENTIAL ZONE CURRENT LAND USE ANALYSIS	DATE: 10/09/2023
	SCALE: AS SHOWN
	PROJECT NUMBER: JANS0018
 119 Grand Avenue, Suite D Bellingham, Washington 98225 (360) 306-8161	SHEET NO.  1  OF 1