

Public Hearing Testimony on proposal: SUB2022-0033 / VAR2023-0002

Matt & Wendy Larson <mwsl48@gmail.com>

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To: Bowker, Kristina J. <kbowker@cob.org>; Grp.PL.Planning Mail (planning@cob.org) <planning@cob.org>

📎 1 attachments (81 KB)

Matt Larson Testimony March 13 2024.pdf;

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To:

Planning & Community Development,
210 Lottie Street, Bellingham, WA 98225

planning@cob.org

In care of Kristina Bowker, kbowker@cob.org

Public Hearing Testimony on the following proposal:

SUB2022-0033 / VAR2023-0002: An Infill Toolkit and Variance request for the Stream
Bellingham Townhomes Plat.

March 15, 2024

Attached please find my testimony for the public hearing on Tuesday March 13.

I swear that my testimony is truthful.

I attended the public hearing and intended to speak, however I had to leave early because the public seating provided became painful for a physical condition I have. When I got home, I tried to join by Zoom, but was unable to join due to technical difficulties. Therefore, I am submitting the attached as my later-allowed technology-challenged written public comment.

Yours truly,

Matt Larson

Public Hearing Testimony regarding proposed development between Meridian and country club.

My name is Matt Larson, and I am a Bellingham resident, concerned about the applicant's failure to comply with municipal ordinance requirements. I wish to address four points of concern.

1. The required .40 Green Factor must be demonstrated prior to deciding on plats.

The project fails to meet the required .40 Green Factor landscape score.

Planning staff (Exhibit 1 Staff Report, page 6) states:

Based on the information provided by the applicant the proposed development complies with the required green factor score excluding the area proposed for dedication to the City for the future roundabout.

I note with some surprise that there is no statement the Planning Department staff verified this key figure. My understanding is Whatcom Million Trees Project (WMTP) carefully checked and calculated only a .33 score at best, which is significantly below the ordinance requirement for this type of project.

Minor tweaks in final landscape plan documents are unlikely to close this gap.

Because the site is jammed tight with units, significant design changes may be required, including possibly removing some units.

I urge you to please require the applicant to meet the requirement and make those changes now, and also ask Planning to independently verify the revised plan's Green Factor score, before any approval is granted for this proposed development. Otherwise, a terrible precedent is set: local developers & their designers/planners will realize the Green Factor is a meaningless paper calculation that won't be verified, can be easily distorted, and will not be taken seriously. This is extremely important both for this project and for future projects in our city.

2. The applicant misrepresents how many trees could be saved by removing up to 8 large double-footprint, two-story luxury townhomes.

The applicant (Attachment N response to RFI 2, page 3) states:

Removing these buildings would not necessarily result in saving a significant number of "mature" trees; approximately 40 trees would be removed for these buildings.

This statement is disingenuous at best. The applicant did not take the logical, obvious site planning step to shift some of the remaining townhome buildings laterally along the inner access lane, to optimize the site layout and sensitively place the buildings between mature tree clusters. Nothing about the site's geology/soils, utilities, or anything else technically precludes such site-sensitive placement. When that simple step is done, as shown again by WMTP (Michael Feerer's packet, Image

C), significantly *more* mature trees can be saved, while still providing substantial infill housing and profit for the applicant.

3. Questionable and convenient economic impact is declared by applicant of removing the 8 two-story larger units.

The applicant (Attachment N response to RFI 2, page 3) states:

Eliminating 11% of the project density could jeopardize project financing and have significant impacts on the ability to make the project economically viable. Charging higher rents or sale prices to offset this is not a reasonable solution as this is inconsistent with City efforts to reduce housing costs.

This claim is a convenient, unverified excuse to block *any* reduction of units for any non-technical reason, apparently to protect the maximum profit potential of a maxed-out site plan. **Where is proof or justification of this questionable financial assertion?** The assertion seems highly unlikely on its face, based on basic math applied to real estate development costs and returns.

If the developer is such a proponent of high-density infill, as they state repeatedly in their materials, why include eight expansive 2-story townhomes in the mix? Those could instead become many more smaller units.

Diversity of housing is also used by the applicant to justify these units' inclusion. Diversity *is* important for *affordable* infill, but the 2,215 square foot 3-bedroom luxury townhomes along the golf course are clearly not intended to be affordable housing.

It is obvious these golf course town homes are present for their profit impact alone, and not for affordable housing impact – and this comes at the community's expense of non-compliance with our Infill Toolkit requirements.

4. This design has non-compliant 3-story tall, long inner "canyons" of garage doors and paving.

The applicant (Attachment N response to RFI 2, page 3) states:

[BMC] Figure 20.28.050(I) reflects design and landscaping that is consistent with the project design.

However, BMC 20.28.050(I)3 requires:

Along streets, lanes and alleys, landscaping shall be provided to separate the parking and driveways between individual dwelling units, or the director may approve an alternative approach that breaks up parking and provides visual interest to parking facilities. See Figure 20.28.050(I).

A simple comparison of the proposed amount of landscaping and visual interest in the ordinance example figure above, 20.28.050(I), compared to sheets A3.40, L-3 and L-7 of the applicant's plan set reveals a dramatic difference. Very little landscape or

visual interest is provided in the design's 3-story flat garage-side wall for virtually all of the smaller units in the project.

This will create an unfriendly, undesirable inner walled canyon "no-man's land" that does *not* meet the requirements, nor the intent and spirit, of the Infill Toolkit specification. Why the Planning Department approved this is a mystery to me.

I grew up in Los Angeles, where these sorts of terrible designs are common. Miniscule planter areas, such as the ones proposed here, usually become gravel-only or even paved. This is because over time, small shrubs in such tiny planters fail to thrive in the alleys amidst the paving, car fumes, and pet urine. The applicant's design is a proven loser, which is why our Infill Toolkit protects us from this kind of bad design.

Please hold the applicant to the Infill Toolkit's legally required design standards. Ensuring the quality of such internal spaces is important both for future residents of this development and for the surrounding community.

In closing, please do not let developer-driven maximized profit margins be allowed to run riot over our city ordinances, at the expense of desperately needed mature trees at this location, and at the expense of our community's need for adequate design.

Thank you.

Sincerely,

Matt Larson

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