

**Whatcom County
Planning & Development Services
Staff Report**

Affordable Housing Options

I. File Information

File #: PLN2021-00012

File Name: Affordable Housing Options

Applicant: Whatcom County Planning and Development Services (PDS)

Project Summary: Proposed amendments to the Whatcom County Code Title 20 (Zoning) to provide additional affordable housing options by allowing and regulating tiny homes and allowing duplexes in planned unit developments.

Location: Countywide.

Attachments

- Draft Ordinance
- Exhibit A – Proposed Amendments

II. Background

The Council has expressed interest in increasing affordable housing options, in particular by amending the Whatcom County Code to allow for the siting of tiny homes within mobile home or RV parks or on individual lots, as newly authorized under amendments to RCW 58.17.040 via ESSB 5383. Staff is also proposing amendments to the Planned Unit Development (PUD) code to allow and encourage duplexes in urban growth areas. Both are intended to provide additional affordable housing options for Whatcom County citizens.

Tiny Homes

What are Tiny Homes?

To decipher how best to develop the regulatory structure to allow tiny homes, staff first identified the key characteristics of the various types of tiny homes to compare with our existing types of analogous residential units. Broadly, but in more detail in Table 1, these characteristics have to do with what type of state or federal license or certification they can obtain, whether or not they're self-contained¹, and whether they have chassis and axles/wheels, all of which have to do with whether they are intended or can be used for long-term (residential) or short-term (recreational) use. There are other differences, like how much insulation they have or whether they have basic sanitary facilities such as toilets, showers, and sinks, but these are built into the certification/licensing standards and the characteristics we've used seem to suffice for classification.

¹ Meaning do they have tanks to hold water and sewage and have batteries for power, or do they need to be connected to utilities to operate?

Based on this analysis, we have identified four types of tiny homes, each corresponding to one of our existing unit types. The two that are intended for long-term residential use are:

- *Site-Built Tiny Homes* are built on-site, are not self-contained, are intended for long-term use, and meet the International Residential Code (IRC) standards. They are analogous to standard site-built homes, except that they're smaller (< 400 sq. ft.).
- *Manufactured Tiny Homes* are built off-site (generally at a manufacturing plant) with a chassis, axles, and wheels and transported to their final location (though the wheels may be removed) where the unit is placed on a permanent foundation. They are not self-contained, are intended for long-term use, and would have to meet the IRC standards *or* be HUD certified *and* be L&I certified as a permanent dwelling unit. They are analogous to standard mobile (or manufactured) homes, except that they're smaller.

The other types of tiny homes that are getting a lot of interest are Tiny Homes on Wheels (or THOWs, and yes, a real acronym). These tend to be homemade but, because of their construction standards, they are only intended and can only be certified for short-term recreational use or occupancy. But even among them, based on key characteristics, there are two different types. We're designating them:

- *Type 1 Tiny Homes on Wheels* have a chassis, axles, and wheels and are intended for trailering. They are *not* self-contained so must be hooked up to utilities. They do not meet the IRC standards nor are they certified by HUD for long-term residential use, but can be certified by L&I for short-term recreational use. And they must be licensed by the state Department of Licensing for transport on the highways. They are analogous to park model trailers.
- *Type 2 Tiny Homes on Wheels* are similar to Type 1 THOWs, but *are* self-contained, meaning they have tanks to hold water and sewage and have batteries for power so that they don't always need to be connected to utilities. They do not meet the IRC standards nor can they be certified by HUD for long-term residential use, but can be certified by L&I for short-term recreational use. And they must be licensed by the state Department of Licensing for transport on the highways. They are analogous to recreational vehicles (RVs).

Regarding building permit requirements, please note that the Council already adopted the newest International Residential Code, including Appendix Q, which contains the building code rules for tiny homes.

We would also like to point out that staff met several times with some tiny home proponents who proposed a third type of THOW. This type wouldn't meet IRC or HUD standards, but would be based on standards we specifically adopt in our code. These standards, they claimed, would be based on ANSI standards (what L&I uses to certify RVs) plus some additional standards (they referred to them as ANSI++) and our Building Official would have to certify them for use in Whatcom County. However, this approach would create significant jurisdictional regulatory inconsistencies since such units wouldn't be able to be used in any other jurisdiction (including the cities in Whatcom County) as they would only be "certified" for use in unincorporated Whatcom County under our own unique standards.

These proponents were also asking that these types of THOWs be able to be used for guest lodging for longer than 120 days², which is our standard "temporary recreational occupancy" time limit under existing code. Extending temporary recreational occupancy would essentially make these THOW's

² For all Temporary Recreational Occupancies – On individual lots, the maximum length of stay of any recreational vehicle on a lot may not exceed a total of 120 days per calendar year; provided, that no accessory guest RV shall remain on the subject lot for more than 14 consecutive days nor more than 30 days total per calendar year.

permanent accessory dwelling units and raise potential GMA challenges and cause greater impacts that come with such increased densities, especially in rural areas.

Council should also be aware that staff tried very hard to figure out a way to allow “tiny home villages” (including those allowing site built tiny homes) in rural areas. However, GMA rural density restrictions significantly limit the potential for such “villages” in rural areas—meaning they would have to meet the underlying rural low density zoning just like any other subdivision. Our conclusion was that such tiny home villages are more likely to be created in cities or UGAs (which allow higher urban densities) and then only when adequate utilities are available, which our cities generally won’t extend until the property is annexed. But we do have existing (nonconforming at least in terms of density) mobile home and RV parks, so allowing the appropriate type of tiny homes within them at least furthers the affordable housing goal.

Allowing Duplexes in Planned Unit Developments

Another amendment proposed as a way to increase affordable housing options is to allow duplexes in certain zones when a project is developed as a Planned Unit Development (PUD) (WCC Chapter 20.85). PUDs:

- Allow certain uses beyond those allowed in the underlying zone when a project is developed as a planned neighborhood community;
- Can only be developed within Urban Growth Areas and have to be at least two acres in size (except under certain conditions listed in WCC 20.85.020);
- Have additional standards for buffering, open space, circulation, access, parking, storage, and utilities;
- Allow for increased densities (WCC 20.85.108);
- Allow a relaxation of dimensional standards (WCC 20.85.109); and,
- Can only be approved by Council.

Currently PUDs allow single-family and multi-family residential uses, but not duplexes. To rectify this incongruity and help promote affordable housing, staff is proposing amendments to WCC 20.85.050.

Table 1. Defining characteristics of the various types of "homes"

Characteristic	Site-Built Home	Site-Built Tiny Home	Manufactured (Mobile) Home	Manufactured Tiny Home	Park Model Trailer	Type 1 Tiny Home on Wheels	Recreational Vehicle	Type 2 Tiny Home on Wheels
Meets IRC standards for permanent dwelling unit	Yes	Yes	Yes	Yes	No	No	No	No
OR Is HUD certified	No	No	Yes	Yes	No	No	No	No
Is L&I certified for Use ³	No	No	Yes, as a permanent dwelling unit	Yes, as a permanent dwelling unit	Yes, for recreational use	Yes, for recreational use	Yes, for recreational use	Yes, for recreational use
Is DOL licensed	No	No	No	No	No	No	Yes	Yes
Is intended/ licensed for long-term or short-term residential use	long-term	long-term	long-term	long-term	short-term	short-term	short-term	short-term
Is self-contained (wastewater, water, power) (if not, must be connected to utilities)	No	No	No	No	No	No	Yes	Yes
Has chassis and axles/wheels	No	No	Yes when manufactured, but wheels removed once sited	Yes when manufactured, but wheels removed once sited	Yes, when manufactured, but wheels removed once sited	Yes, when manufactured, but wheels removed once sited	Yes	Yes

³ Certified as a (long-term) permanent dwelling unit or for (short-term) recreational use, as noted.

III. Amendments

The proposed amendments are found in Exhibit A. Please refer to that attachment; explanations are provided therein. Here is an overview, though.

Proposed Tiny Home Regulatory Structure

Based on the characteristics shown in Table 1 each of the four types of tiny homes corresponds or is analogous to a type of (either long- or short-term) residence that the County already regulates. Thus, to simplify or streamline the means to regulate these units, we can just define each of these types of tiny homes as one of our existing types and they would be regulated under existing regulations for that type.

So staff is proposing to add definitions for each of the types: “Tiny Homes,” with subcategories for “site-built tiny homes” and “manufactured tiny homes”; and “Tiny Homes on Wheels,” with subcategories for “Type 1 THOWs” and “Type 2 THOWs” (see Exhibit A, §20.97.435.03 & §20.97.435.04). Then we’re proposing to amend the definitions for “Mobile Home” to include “Manufactured Tiny Homes” (Exhibit A, §20.97.250), “Recreational Vehicle” to include “Type 2 THOWs” (Exhibit A, §20.97.335), and “Park Model Trailer” to include “Type 1 THOWs” (Exhibit A, §20.97.292) (plus some grammatical edits).

With these definitional amendments, each of these tiny home types would then be allowed wherever their existing corresponding standard type is allowed under existing code:

- Site-built tiny homes would generally be allowed wherever and under whatever circumstances and standards standard site-built homes are allowed (either as a primary use or an accessory dwelling unit (ADU));
- Manufactured tiny homes would generally be allowed wherever and under whatever circumstances and standards standard mobile (or manufactured) homes are allowed (as a primary use, an ADU, or in a mobile home park);
- Type 1 THOWs would generally be allowed wherever and under whatever circumstances and standards park model trailers are allowed (as temporary guest lodging or in an RV park in a space designated for park models, meaning they have utility hookups); and,
- Type 2 THOWs would generally be allowed wherever and under whatever circumstances and standards recreational vehicles are allowed (as temporary guest lodging or in an RV park).

Table 2 more specifically identifies in which zones the various tiny home types would be allowed, as what type of use, and what permit would be required. These are identical to where we currently allow their existing counterpart (single-family residences, mobile homes, park model trailers, and recreational vehicles). Do note, however, that for simplicity’s sake there may be additional standards or requirements in some zones not shown in the table, but they’d be the same as for their counterparts.

Apart from these definitional amendments, staff is also proposing to clarify our Mobile Home and RV Park Standards. First, we’re proposing to separate the two into distinct sections. We’re also identifying the process by which such a park can be permitted (binding site plan or condominium), and that CC&R’s must be submitted and approved (so that we can ensure long-term maintenance and operations are dealt with properly). Apart from that, we’re keeping the rules that applied to both in both, but putting the rules that only apply to one type of park in their respective sections. (See Exhibit A, §20.80.950 and §20.80.955.)

Under the proposed regulations, one could develop a mobile home park for mobile homes, manufactured tiny homes, or a mix of the two; and an RV park for RV’s, Type 2 THOWs, or a mix of the two. Mobile home parks are allowed as a conditional use in the Resort Commercial (RC), Urban

Residential Mixed (UR-MX), and Urban Residential – Medium Density (URM) Districts. Recreational vehicle (RV) parks are allowed as a conditional use in the Resort Commercial (RC), Tourist Commercial (TC), and Point Roberts Special Districts.

Table 3 shows how many mobile home and RV parks currently exist in the County. In total there are 39 mobile home parks and 7 RV parks, containing 2,858 spaces, 1,881 of which can be used for park models or Type 1 THOWS.

Duplexes in Planned Unit Developments

While most of the changes to WCC 20.85.053 shown in Exhibit A are just cleaning up grammar, the two that are policy changes are where “duplexes” has been added to subsections (1) and (2).

IV. Comprehensive Plan Evaluation

The proposed amendments to the regulations (WCC Title 20) have been developed using the guidance of the Comprehensive Plan so as to remain consistent. Particularly relevant are:

Goal 3C: Create opportunity for a broad range of housing types and encourage mixed affordability.

Policy 3C-1: Support lot clustering, varied lot sizes, small-scale multi-family dwellings, accessory housing, especially accessory dwelling units (ADUs) in single-family zoning, and reductions in infrastructure requirements for subdivisions as incentives for development of housing obtainable by purchasers with the greatest possible mix of needs and household incomes.

Policy 3C-3: Support development of manufactured and mobile home parks and establish design criteria that will enable them to fit into the surrounding community.

Goal 3E: Provide for future housing needs by responding to changing household demographics.

Policy 3E-1: Review and revise existing regulations to identify inhibitions to housing for the varying preferences of those needing housing. Focus on population segments with particular needs such as temporary, transitional, or emergency housing.

Goal 3F: Provide incentives to create affordable housing.

Policy 3F-3: Support innovative housing ideas including co-housing (essentially a micro-community with some centralized facilities), elder cottages (housing units for healthy but aging family members), accessory dwelling units (ADUs) in single family zoning of all jurisdictions, including cottage designs available at planning department front desk, and shared living residences or group quarters in UGAs, and educate the public about them.

Table 2. Zoning Districts where Tiny Homes would be allowed (and by what Permit⁴) under the proposed rules

Zoning District	Tiny Home Type			
	Site-Built Tiny Homes	Manufactured Tiny Homes	Type 1 Tiny Homes on Wheels	Type 2 Tiny Homes on Wheels
Urban Residential (UR)	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit⁵ (ADM) 	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) Temporarily within pre-existing recreational subdivisions of the Foothills Subarea (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence⁶ (ADM) Temporarily within pre-existing recreational subdivisions of the Foothills Subarea (ADM)
Urban Residential – Medium Density (URM)	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) Temporary Caregiver/ Invalid Residence (AAU) Mobile Home Parks (CUP) Sited in a Mobile Home Park (P) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM)
Urban Residential Mixed (UR-MX)	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) Temporary Caregiver/ Invalid Residence (AAU) Mobile Home Parks (CUP) Sited in a Mobile Home Park (P) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM)
Residential Rural (RR)	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) Temporarily within pre-existing recreational subdivisions of the Foothills Subarea (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) Temporarily within pre-existing recreational subdivisions of the Foothills Subarea (ADM)
Rural Residential-Island (RR-I)	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> Primary residence (P) Accessory Dwelling Unit (ADM) Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> Temporary Caregiver/ Invalid Residence (ADM)
Eliza Island (EI)	<ul style="list-style-type: none"> Primary residence (P) 	<ul style="list-style-type: none"> Primary residence (P) 		

⁴ P = Permitted; ACC = Accessory Use; ADM = Administrative Approval; CUP = Conditional Use

⁵ For all ADUs – Some zoning districts have a minimum lot size requirement for detached ADUs and some areas require that accessory apartments and detached ADUs are consistent with the underlying zoning.

⁶ For all Temporary Caregiver/Invalid Residences – One year, renewable, plus additional standards.

Zoning District	Tiny Home Type			
	Site-Built Tiny Homes	Manufactured Tiny Homes	Type 1 Tiny Homes on Wheels	Type 2 Tiny Homes on Wheels
Rural (R)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) • Temporary Recreational Occupancy (P)
Point Roberts Transitional Zone (TZ)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM)
Agriculture (AG)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) • Farm Worker Residence (ADM) • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) • Farm Worker Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) • Farm Worker Residence (ADM)
Rural Forestry (RF)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) • Forestry Worker Residence (ADM) • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) 	<ul style="list-style-type: none"> • Temporary Caregiver/ Invalid Residence (ADM) • Temporary Recreational Occupancy⁷ (P) • Recreational Vehicle Parks (CUP) • Temporarily⁸ in an RV Park (P)
Commercial Forestry (CF)				<ul style="list-style-type: none"> • Temporary (6 mos.) living quarters for trail crews, fire crews, nursery crews, logging crews, maintenance crews and watchmen (P)
Recreation & Open Space (ROS)	<ul style="list-style-type: none"> • Caretaker's Residence (P) 	<ul style="list-style-type: none"> • Caretaker's Residence (P) 		
Rural General Commercial (RGC)				
Neighborhood Commercial Center (NC)				

⁷ For all Temporary Recreational Occupancies – On individual lots, the maximum length of stay of any recreational vehicle on a lot may not exceed a total of 120 days per calendar year; provided, that no accessory guest RV shall remain on the subject lot for more than 14 consecutive days nor more than 30 days total per calendar year.

⁸ In RV Parks the maximum length of stay may not exceed 180 days for any one-year time period.

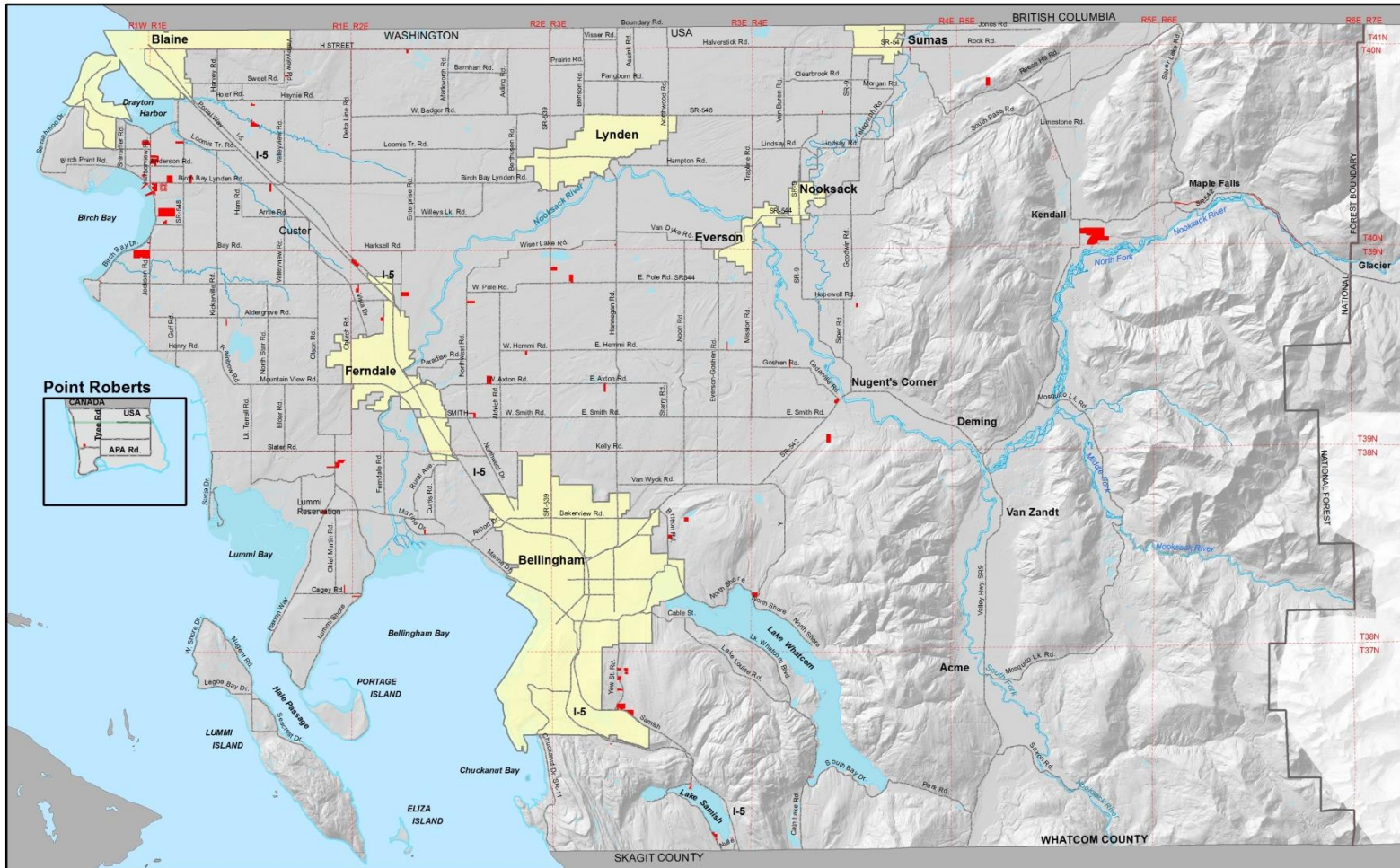
Zoning District	Tiny Home Type			
	Site-Built Tiny Homes	Manufactured Tiny Homes	Type 1 Tiny Homes on Wheels	Type 2 Tiny Homes on Wheels
Small Town Commercial (STC)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 		<ul style="list-style-type: none"> • Recreational Vehicle Parks (CUP) • Temporarily in an RV Park (P)
General Commercial (GC)				
Tourist Commercial (TC)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Temporary Recreational Occupancy (P) 	<ul style="list-style-type: none"> • Temporary Recreational Occupancy (P) • Recreational Vehicle Parks (CUP) • Temporarily in an RV Park (P)
Resort Commercial (RC)	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) 	<ul style="list-style-type: none"> • Primary residence (P) • Accessory Dwelling Unit (ADM) • Mobile Home Parks (CUP) • Sited in a Mobile Home Park (P) 	<ul style="list-style-type: none"> • Temporary Recreational Occupancy (P) 	<ul style="list-style-type: none"> • Temporary Recreational Occupancy (P) • Recreational Vehicle Parks (CUP) • Temporarily in an RV Park (P)
Light Impact Industrial (LII)	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 		
General Manufacturing (GM)				
Heavy Impact Industrial (HII)				
Rural Industrial And Manufacturing (RIM)	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 		
Airport Operations (AO)	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 	<ul style="list-style-type: none"> • Security/Caretaker Residence (ACC) 		
Point Roberts Special District (overlay zone)	<ul style="list-style-type: none"> • Allows whatever is allowed in the underling zone 	<ul style="list-style-type: none"> • Allows whatever is allowed in the underling zone 	<ul style="list-style-type: none"> • Allows whatever is allowed in the underling zone, plus: • Temporary Recreational Occupancy (P) 	<ul style="list-style-type: none"> • Allows whatever is allowed in the underling zone, plus: • Temporary Recreational Occupancy (P)
Cherry Point Industrial (CP)				

Table 3. Mobile Home & RV Parks in Whatcom County

Name	Type	Zone	Acres	Assessor LUCODE	Total No. of Units	No. of Park Model Spaces	No. of MH Spaces
Agate Bay Mobile Estates	MH Park - Leased Spaces	R5A	10.9	1525 M/H PK 25 SP	25		25
Baywood MHP	MH Park - Leased Spaces	URM6	23.4	1599 M/H PK+99 SP	47		47
Birch Bay Retirement Park	MH Park - Leased Spaces	UR4	3.9	1518 M/H PK 18 Sp	17		17
Birch Bay Trailer Court	MH Park - Leased Spaces	RC	33.9	1152 M/H IO-inPK	151	18	133
Britton Rd. MH Court	MH Park - Leased Spaces	UR	4.8	1500 M/H PK	4		4
Calmore Cove MHP	MH Park - Leased Spaces	RR2/R2A	15.8	1545 M/H PK 45 SP	41	5	36
Cedar Grove MHP	MH Park - Leased Spaces	R10A	26.3	1599 M/H PK+99 SP	105		105
Double L Ranch MHP	MH Park - Leased Spaces	R5A	15.3	1524 M/H PK 24 SP	24	2	22
Edgewater Resourt MHP	MH Park - Leased Spaces	RC	4.8	1547 M/H PK 47 SP	25	12	13
Evergreen Manor MHP	MH Park - Leased Spaces	R5A	19.6	1560 M/H PK 60 SP	43		43
Evergreen Retreat MHP	MH Park - Leased Spaces	R10A	1.5	1516 M/H PK 16 SP	16		16
Fairfield Mobile Court	MH Park - Leased Spaces	UR4	10.2	1526 M/H PK 26 SP	17		17
Forest Park MHP	MH Park - Leased Spaces	URMX6-12	5.6	1553 M/H PK 53 SP	50		50
Gulfside MHP	MH Park - Leased Spaces	RR1	1.0	1505 M/H PK 5 SP	4		4
Harborview MHP	MH Park - Leased Spaces	R5A	19.9	1516 M/H PK 16 SP	15		15
Hartvig MHP	MH Park - Leased Spaces	UR4	6.1	1508 M/H PK 8 SP	7		7
Hidden Valley MHP	MH Park - Leased Spaces	R5A	1.3	1508 M/H PK 8 SP	6	4	2
Hidden Village Estates	MH Park - Leased Spaces	R2A	14.6	1599 M/H PK+99 SP	12	2	10
Hilltop Haven MHP	MH Park - Leased Spaces	URM6-12/R10A	8.5	1525 M/N PK 25 SP	25		25
Lake Terrell Mobile Ranch	MH Park - Leased Spaces	R5A	5.0	1516 M/H PK 16 SP	7		7
Larsens Mobile Manor	MH Park - Leased Spaces	RR2A	9.3	1555 M/H PK 55 SP	55		55
Mantheys MHP	MH Park - Leased Spaces	R10A	23.2	1557 M/H PK 57 SP	57		57
Maple Leaf Court	MH Park - Leased Spaces	R10A	9.6	1522 M/H PK 22 SP	22		22
Maplewood Meadows	MH Park - Leased Spaces	R5A	20.4	1520 M/H PK 20 SP	19		19
Marine Dr. MHP	MH Park - Leased Spaces	RR2A	4.3	1511 M/H PK 11 SP	10		10
Mobile Home Manor	MH Park - Leased Spaces	AG	1.3	1511 M/H PK 11 SP	11		11
Mt. Baker MHP	MH Park - Leased Spaces	R5A	8.5	1530 M/H PK 30 SP	20		20
Nooksack Valley MHP	MH Park - Leased Spaces	AG	1.7	1507 M/H PK 7 SP	7		7
NW Mobile Park	MH Park - Leased Spaces	AG	11.8	1526 M/H PK 26 SP	27		27

Plaza Park	MH Park - Leased Spaces	R5A	14.1	1591 M/H PK 91 SP	27	2	25
Royal Coachman Mobile Estates	MH Park - Leased Spaces	R5A	9.9	1528 M/H PK 28 SP	28		28
See Haven MHP	MH Park - Leased Spaces	UR4	1.3	1512 M/H PK 12 SP	9		9
Sumas MHP	MH Park - Leased Spaces	AG	2.1	1508 M/H PK 8 SP	8		8
Sunny Point Trailer Park	MH Park - Leased Spaces	STC	4.2	1508 M/H PK 8 SP	2		2
Gulf Aire Condo	MH Park - Owned Spaces	TZ		1417 M/H IN CONDO PP	16		16
Lake Samish Terrace	MH Park - Owned Spaces	RR2		1417 M/H IN CONDO PP	53		53
Latitude 49 Resort Park Condo	MH Park - Owned Spaces	RC		1418 PRK MOD IN CONDO RP	315	315	0
Smallwood Shores Condo	MH Park - Owned Spaces	R5A		1416 M/H IN CONDO RP	10		10
Wildwood Resort Condo	MH Park - Owned Spaces	R5A		1418 PRK MOD IN CONDO RP	84	84	0
Beachwood Resort	RV Park	URM6	76.6	7516 RV PARKS	326	326	
Birch Bay Leisure Park	RV Park	URM6	81.1	7816 RV PARKS	603	603	
Black Mt. Ranch	RV Park	R5A	171.7	7499 OTHER RECREAT	315	315	
North Bay Park	RV Park	URM6	2.5	7516 RV PARKS	33	33	
Richmond Resort	RV Park	RC	1.4	7516 RV Parks	10	10	
Sea Breeze RV Park (PM within RV Park)	RV Park	RC	7.9	1155 PM IO-in PK	4	4	
Whatcom Meadows	RV Park	R5A	159.1	7519 OTHER RESORTS	146	146	
Total					2858	1881	977

Table 4. Locations of Mobile Home and RV Parks in Whatcom County



Whatcom County

Legend

■ Mobile Home Park

June 2021

USE OF WHATCOM COUNTY'S GIS DATA IMPLIES THE USER'S AGREEMENT WITH THE FOLLOWING STATEMENT: Whatcom County Disclaims any warranty of merchantability or warranty of fitness of this map for any particular purpose, either express or implied. No representation or warranty is made concerning the accuracy, currency, completeness or quality of data depicted on this map. Any user of this map assumes all responsibility for use thereof, and further agrees to hold Whatcom County harmless from and against any damage, loss, or liability arising from any use of this map.



V. Draft Findings of Fact and Reasons for Action

Staff recommends the Council adopt the following findings of fact and reasons for action:

1. The County Council has expressed interest in increasing affordable housing options, in particular by amending the Whatcom County Code to allow for the siting of tiny homes.
2. Additionally, Planning and Development Services (PDS) has identified that in addition to allowing single- and multi-family dwellings in Planned Unit Developments, allowing duplexes would also increase affordable housing options.
3. PDS submitted an application (PLN2021-00012) to make amendments to Whatcom County's zoning regulations (WCC Title 20) to provide these affordable housing options.
4. A determination of non-significance (DNS) was issued under the State Environmental Policy Act (SEPA) on May 20, 2021.
5. Notice of the subject amendments was submitted to the Washington State Department of Commerce on May 20, 2021, for their 60-day review.
6. On June 24, 2021, the Planning Commission held a duly noticed public hearing to consider testimony on the proposed amendments.
7. The County Council held a duly noticed public hearing on the proposed amendments on October 29, 2021, and reviewed and considered the Planning Commission recommendation, staff recommendations, and public comments on the proposed amendments.
8. The amendments are consistent with the Growth Management Act, Whatcom County Comprehensive Plan, and other applicable requirements.
9. The proposed amendments reflect current local circumstances and promote the general public health, safety, morals and welfare.

VI. Proposed Conclusions

1. The amendments are in the public interest.
2. The amendments are consistent with the Whatcom County Comprehensive Plan.

VII. Recommendations

1. Planning and Development Services recommends that the Council adopts the proposed regulations shown in Exhibit A.
2. The Planning Commission voted 7-0 to recommend approval of the proposed amendments to the County Council.