

# ALLIED

## Neighborhoods Association

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May 8, 2017

To: Architectural Board of Review  
RE: 2017 Bath Street  
MST2017-00146

Dear Board Members,

Our concern with conversions of residential units to hotel or short term occupancy can be stated simply. The City Zoning Ordinance (specifically 28.85.040) requires that review bodies, before approving any Development Plan, must make certain findings ("Development Plan Approval Findings"). **One of the required findings is:** *"The proposed development is consistent with the principles of sound community planning"*. The findings must not be simply boilerplate recitations, but must be based on specifics and articulable, substantive considerations.

This requirement makes good sense: though you are not charged specifically with Community Planning, your decisions should be made in the broader context of sound planning for the community at large.

With respect to the project presently before this Board...

**it is inconceivable to us how this conversion of a residence to a hotel unit can be deemed consistent with sound community planning**, much less with priorities set out in the General Plan and Housing Element. Very recently, this Board (by 3-1 vote) and the Historic Landmarks Commission (HLC) (unanimously) turned down similar applications on such grounds.

In reaction to a severe housing shortage, with current vacancy rates at historic lows, the City has elevated to highest priority the creation and preservation of housing stock. The loss of even a single unit of residential housing, aside from its cumulative effect, rings of a blatant inversion of priorities, one that places a higher priority on hotel units than scarce housing.

It should be added that part of our (Allied's) mission is to promote stable neighborhoods; the proliferation of these short term rentals has a destabilizing effect.

It has been argued that this application only involves one unit - no big deal since the AUD promises many new "affordable" units. But please consider: since addressing the housing crunch, the City has realized how hard it is getting each individual unit built, and has paid dearly for them with City resources (such as relaxed development standards and other incentives). On the other hand, we have no shortage of hotels. An HLC Commissioner noted our miniscule residential housing vacancy rate versus a substantial (24.38%) hotel vacancy rate, and urged that we should not be depleting things we need badly, while adding to what we already have in abundance.

Our purpose in addressing this issue is to urge you to do due diligence in making the community planning findings that align with our City's fundamental priorities.

Respectfully,  
Allied Neighborhoods Association

cc: City Council  
Planning Commission  
Ariel Calonne