



# MEMORANDUM

DATE: August 5, 2014

TO: Chair Capron and Members of the East Bellevue Community Council

FROM: Carol Helland, Land Use Director, 452-2724, [chelland@bellevuewa.gov](mailto:chelland@bellevuewa.gov)  
Mike Bergstrom, Principal Planner, 452-2970, [mbergstrom@bellevuewa.gov](mailto:mbergstrom@bellevuewa.gov)  
*Development Services Department*

SUBJECT: Residential Room Rentals – Courtesy Hearing on Permanent Regulations

## INTRODUCTION

At your August 5, 2014 meeting, the EBCC will hold a courtesy hearing on draft permanent regulations governing the rental of individual rooms in non-owner-occupied residential dwellings (Attachment A). The Planning Commission has held a series of study sessions over the past few months on the development of permanent regulations to replace the interim regulations put into effect by Ordinance No. 6128 (Attachment B), and will hold a public hearing on this draft on September 10.

## BACKGROUND

In September 2013 the City Council, in response to concerns raised by community residents about an emerging business model whereby an ownership group was purchasing homes with the intention of renting out individual rooms under separate lease agreements, adopted Ordinance No. 6128 (Attachment B) as an emergency measure to address, on an interim basis, that practice and its potential impacts. Initially in effect for six months, the provisions of Ordinance No. 6128 were later extended by Council adoption of Ordinance No. 6152. The interim regulations are now set to expire on September 23, 2014 unless extended again by Council. Council held a hearing on such an extension on August 4, 2014. Staff will provide the EBCC with the outcome of that hearing on August 5.

Council adopted the interim regulations to give the Planning Commission sufficient time to develop permanent regulations. To help the Commission in its work, Council approved a list of “guiding principles” (Attachment C), intended to result in narrowly-tailored permanent amendments to the Land Use Code to address the concerns expressed by the community. The Planning Commission has worked over the past several months on the development of permanent regulations, and has directed staff to schedule a public hearing on the draft contained in Attachment A. The August 5 EBCC courtesy hearing on these regulations will provide the Commission with your input for consideration at that hearing.

## ANALYSIS

The key features of both the interim regulations and the proposed permanent regulations are described below:

### **Interim Regulations Currently In Effect (Attachment B):**

Ordinance No. 6128 contains the following key features:

- It lowers the number of unrelated people who can live together from 6 to 4;
- It clarifies what constitutes “related persons” (in the definition of “family”);
- It allows more than 4 unrelated people to live together if they can demonstrate that they operate in a manner “functionally equivalent” to a family;
- It clarifies the definition of “boarding/rooming houses and bed and breakfasts”; and
- It provides for amortization of uses/leases that do not conform to the interim regulations.

### **Draft Permanent Regulations (Attachment A):**

The draft permanent regulations take a different approach than the interim regulations. It is intended to accomplish the following:

- Allow the rental of an entire dwelling (no individual room rentals) to a “traditional” family, maximum 6 persons, unless all are related;
- Allow the rental of an entire dwelling (no individual room rentals) to a “self-identified” group (all unrelated or some combination of related/unrelated), maximum 6 persons total;
- Allow an owner-occupied dwelling to have a bed & breakfast or boarding house, maximum 2 rooms, subject to Home Occupation permit and all other current regulations;
- Regulate as a “rooming house” a dwelling that is not owner-occupied and offers individual rooms for rent in non-single-family districts.

This draft establishes “Rooming House” as a use, defined as follows:

**“Rooming House.** A non-owner-occupied dwelling in which rooms are offered for rent or lease on an individual room basis.”

This definition, together with the draft regulations summarized below, is proposed because it is this form of rental structure which has been identified by the community as their primary concern.

Key features of the current draft include:

- A rooming house would be allowed only in multi-family and mixed-use land use districts, not in single-family districts.
- Special regulations would apply to rooming houses (see Section 4 of draft ordinance).
- Definitions of “Bed and Breakfast” and “Boarding House” would be revised to reflect owner-occupancy, and to specifically exclude “Rooming House”. All other existing regulations that pertain to Bed and Breakfast and Boarding House uses would remain unchanged, including the requirement for a Home Occupation permit for either use.
- Definition of “Family” would be changed to place a 6-person limit on the total number of occupants, unless all are related by blood, marriage, or adoption.
- No provision for “functionally equivalent” family.
- A new definition of “Single Housekeeping Unit” is proposed.
- As noted above, a new definition of “Rooming House” is proposed.

- Provision for amortization of certain legally-established uses/leases that do not conform to the permanent regulations

**Proposed Special Regulations for Rooming House uses:**

The following general development requirements are proposed specifically for Rooming Houses:

- The Rooming House will be located in a detached single-family dwelling on its own parcel; and
- The Rooming House will offer no more than four rooms for rent to not more than a total of five individuals at any one time; and
- All rooms offered for rent shall be legally-established bedrooms; and
- A local owner, landlord, or registered agent shall be identified as the party responsible and accountable for compliance with the terms of the applicable Land Use Code provisions; and
- Legal on-site parking exists or will be provided, in a quantity equal to the number of bedrooms in the leased residence; and
- Appropriate provisions will be made for maintenance of the property exterior; and
- Appropriate provisions will be made for refuse collection, including trash, recycling, and yard waste; and
- A Rooming House shall comply with City of Bellevue noise and nuisance laws and health and safety codes, and with all other applicable City and State codes and regulations; and
- The designated owner, landlord, or registered agent shall be the “person responsible for the violation” in any civil violations proceedings under the terms of Chapter 1.18 BCC for failure to comply with this section. Tenants shall not be identified as responsible parties by virtue of signing a lease prepared by the owner, landlord, or registered agent for renting a room in a Rooming House.

The Commission discussed whether an Administrative Conditional Use permit should be required for Rooming Houses uses, but determined that such a requirement would not be necessary and might even hinder a goal of the proposed regulations, i.e., removing rooming houses from single-family districts. Therefore, rooming houses will be a permitted use, rather than an administrative conditional use, in the multi-family and mixed-use districts identified in the draft ordinance.

**CONCLUSION**

Following the courtesy hearing, any feedback or comments you have on the proposed ordinance will be forwarded to the Planning Commission for their consideration at the September 10 public hearing. Final action on the ordinance by Council is expected to occur in Fall, 2014. Following that action, staff will return to the EBCC at a public hearing and request your approval or disapproval of the final ordinance.

**NEXT STEPS**

Steps necessary to complete development and adoption of the permanent regulations are shown below.

- September 10, 2014 - Planning Commission public hearing and recommendation to Council
- Council action on proposed ordinance (TBD)
- East Bellevue Community Council public hearing and final action

**ATTACHMENTS**

- A. Draft Ordinance for Permanent Regulations
- B. Ordinance No. 6128 – Interim Regulations Currently In Effect
- C. Principles to Guide Development of Permanent Rental Housing Regulations

# Attachment A

July 10, 2014 Draft

CITY OF BELLEVUE

ORDINANCE No. \_\_\_\_\_

AN ORDINANCE of the City of Bellevue, Washington, amending land use charts to identify "rooming house" as an administrative conditional use in R-10, R-15, R-20, R-30, OLB, F1, F2, F3, BR-OR, BR-RC, BR-R, BR-CR, BR-ORT, and EH-A land use districts, amending general development requirements applicable to "rooming houses", amending the definitions of "bed and breakfast", "boarding house" and "family", creating new definitions of "rooming house" and "single housekeeping unit", repealing Ordinances No. 6126, 6152, and \_\_\_\_\_, providing for severability, and establishing an effective date.

WHEREAS, ..... (list background statements)

WHEREAS, the City of Bellevue has complied with the State Environmental Policy Act (SEPA), Chapter 43.21C RCW, and the City's Environmental Procedures Code, BCC 22.02; and

WHEREAS, the Planning Commission held a public hearing on \_\_\_\_\_, 2014 for the proposed Land Use Code Amendment (LUCA) contained herein; and

WHEREAS, the Planning Commission recommends approval of the proposed Land Use Code Amendment (LUCA) contained herein;

THE CITY COUNCIL OF THE CITY OF BELLEVUE, WASHINGTON, DOES ORDAIN AS FOLLOWS:

Section 1. Section 20.10.440 – Residential Land Use Charts - of the Bellevue Land Use Code is hereby amended to add "rooming house" as a permitted use in the following land use districts: R-10, R-15, R-20, R-30, OLB, CB, F1, F2, and F3, and to add the following related note 17:

17. See LUC 20.20.700 for general development requirements for Rooming House.

The "rooming house" use listing shall be placed in the use chart immediately above the "Senior Citizen Dwellings" listing.

Section 2. Section 20.25D.070 of the Bellevue Land Use Code is hereby amended to add "rooming house" as a permitted use in the following land use districts: BR-OR, BR-RC, BR-R, BR-CR, and BR-ORT, and to add the following related note 6:

6. See LUC 20.20.700 for general development requirements for Rooming House.

The "rooming house" use listing shall be placed in the use chart immediately above the "Hotels and Motels" listing.

Section 3. Section 20.25F.010 of the Bellevue Land Use Code is hereby amended to add "rooming house" as a permitted use in the following land use district: EH-A, and to add the following related note 12:

12. See LUC 20.20.700 for general development requirements for Rooming House.

The "rooming house" use listing shall be placed in the use chart immediately below the "Five or more dwelling units per structure" listing.

Section 4. Section 20.20.700 of the Bellevue Land Use Code is hereby amended to read as follows:

**20.20.700 Rooming houses.**

~~The requirements of LUC 20.20.140 apply to rooming houses.~~

A. Rooming Houses shall comply with the following:

1. The Rooming House shall be located in a detached single-family dwelling on its own parcel; and
2. The Rooming House shall offer no more than four rooms for rent to not more than a total of five individuals at any one time; and
3. All rooms offered for rent shall be legally-established bedrooms; and
4. An owner, landlord, or registered agent shall be identified as the party responsible and accountable for compliance with the provisions of this section. Said party shall be local, and the name and contact information for that party shall be filed with the City prior to establishing the rooming house; and
5. Legal on-site parking exists or shall be provided in a quantity equal to the number of bedrooms leased or available for lease; and
6. Appropriate provisions shall be made for maintenance of the property exterior; and
7. Appropriate provisions shall be made for refuse collection, including trash, recycling, and yard waste.

B. A Rooming House shall comply with City of Bellevue noise and nuisance laws and health and safety codes, and with all other applicable City and State codes and regulations.

C. The owner, landlord, or registered agent designated pursuant to Section A.4 above shall be the "person responsible for the violation" in any civil violations proceedings under the terms of Chapter 1.18 BCC for failure to comply with this section. Tenants shall not be identified as responsible parties by virtue of signing a lease prepared by the owner, landlord, or registered agent for renting a room in a Rooming House.

Section 5. Section 20.50.012 of the Bellevue Land Use Code is hereby amended to revise the definition of "Bed and Breakfast" to read as follows:

**20.50.012 Bed and Breakfast.** An owner-occupied dwelling which temporarily houses guests for profit. A Bed and Breakfast does not include a Rooming House as defined in LUC 20.50.044. (Refer to LUC 20.20.140 for General Development Requirements applicable to Bed and Breakfast uses).

Section 6. Section 20.50.012 of the Bellevue Land Use Code is hereby amended to revise the definition of "Boarding House" to read as follows:

**20.50.012 Boarding House.** An owner-occupied dwelling in which ~~roomers and/or boarders~~ individuals unrelated to the owner are housed and/or fed for profit. This definition includes Transient Lodging as defined in LUC 20.50.048. (SeeRefer to LUC 20.20.140 for General Development Requirements applicable to Boarding House uses). A boarding house does not include a Rooming House as defined in LUC 20.50.044.

Section 7. Section 20.50.020 of the Bellevue Land Use Code is hereby amended to revise the definition of "Family" to read as follows:

**20.50.020 Family.** Not more than six~~One or more~~ persons, unless all are related by blood, marriage, or legal adoption, (but not more than six unrelated persons)-living together as a single housekeeping unit. For purposes of this definition and notwithstanding any other provision of this Code, children with familial status within the meaning of Title 42 United States Code, Section 3602(k) and persons with handicaps within the meaning of Title 42 United States Code, Section 3602(h) will not be counted as unrelated persons.

Section 8. Section 20.50.044 of the Bellevue Land Use Code is hereby amended to add a new definition of "Rooming House" to read as follows:

**20.50.044 Rooming House.** A non-owner-occupied dwelling that is subject to multiple leases or in which rooms are offered for rent or lease on an individual room basis. (Refer to LUC 20.20.700 for General Development Requirements applicable to Rooming House uses).

Section 9. Section 20.50.046 of the Bellevue Land Use Code is hereby amended to add a new definition of "Single Housekeeping Unit" to read as follows:

**20.50.046 Single Housekeeping Unit.** One household where all the members have common access to and common use of all living, kitchen, and eating areas within the dwelling unit, and household activities and responsibilities such as meals, chores, expenses and maintenance of the premises are shared or carried out according to a household plan or other customary method. If the dwelling unit is rented, the household members must jointly occupy the unit under a single lease in order to be considered a single housekeeping unit.

Section 10. Amortization for Certain Nonconforming Uses. Notwithstanding Section 20.20.560 of the Bellevue Land Use Code, any use of a structure or of land which does not conform to the regulations of the district in which the use exists due to changes in the definitions or other Land Use Code provisions adopted by this ordinance, which use lawfully existed on the date such changes became effective, shall be discontinued by one year from effective date of ordinance.

Section 11. Ordinance No. 6128, Ordinance No. 6152, and Ordinance No. \_\_\_\_\_ are hereby repealed.

Section 12. Severability. Should any provision of this ordinance or its application to any person or circumstance be held invalid, the remainder of the ordinance or the application of the provision to other persons or circumstances shall not be affected.

Section 13. Effective Date. This ordinance shall take effect and be in force five (5) days after adoption and legal publication.

Passed by the City Council this \_\_\_\_\_ day of \_\_\_\_\_, 2014 and signed in authentication of its passage this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

(SEAL)

\_\_\_\_\_  
Claudia Balducci, Mayor

Approved as to form:

\_\_\_\_\_  
Lori M. Riordan, City Attorney

Attest:

\_\_\_\_\_  
Myrna L. Basich, City Clerk

Published: \_\_\_\_\_

CITY OF BELLEVUE, WASHINGTON

ORDINANCE NO. 6128

AN ORDINANCE of the City of Bellevue, Washington, adopting interim official zoning controls to address impacts resulting from the rental of multiple rooms in single-family dwellings to unrelated individuals, by amending the definitions of “boarding house” and “family” and creating a new definition of “rooming house”, for a period of six months, to be in effect while the City drafts, considers, holds hearings, and adopts permanent regulations, to be effective immediately upon adoption, scheduling a hearing on the maintenance of the interim zoning ordinance, providing for severability, and declaring an emergency.

WHEREAS, the Bellevue Comprehensive Plan seeks to maintain and strengthen the vitality, quality, and character of Bellevue’s residential neighborhoods while providing housing choices and affordability; and

WHEREAS, the City of Bellevue has begun an update of its Comprehensive Plan as mandated by the Growth Management Act, and that update will include a broader evaluation of the community’s housing policies, needs, and related issues; and

WHEREAS, the Bellevue City Council has recently heard numerous concerns from citizens about the rental of multiple rooms in single-family dwellings to unrelated individuals and under separate lease agreements, and the impacts of such rentals; and

WHEREAS, the concerns and impacts identified by citizens include the erosion of single-family neighborhood character, from a stable neighborhood character to one that is more transitory, increased density, declining property maintenance, and increased on-street parking, traffic, noise and instances of speeding, among others; and

WHEREAS, the Bellevue Land Use Code currently defines “family” as one or more persons (but not more than six unrelated persons) living together as a single housekeeping unit, but does not define “single housekeeping unit”; and

WHEREAS, the American Community Survey for 2007-2011 shows that the average single-family household size in Bellevue is 2.75 persons; and

WHEREAS, the Bellevue City Council has determined that this rental practice and its real and potential impacts threaten the vitality, quality, stability, and single-

family character of Bellevue's residential neighborhoods, and that emergency action is warranted to diminish this threat; and

WHEREAS, the adoption of the interim controls contained herein will address the immediate impacts resulting from the above-described rental practice, will protect the stability and character of Bellevue's single-family neighborhoods, and will provide an opportunity for the City to more fully research and develop appropriate long-term strategies; and

WHEREAS, the Bellevue City Council has determined that the termination of existing uses that do not conform to the interim controls by July 1, 2014, will fairly and reasonably balance the interests of property owners and users with the benefit to the public; and

WHEREAS, pursuant to WAC 197-11-880, actions that must be undertaken immediately or within a time too short to allow full compliance with the State Environmental Policy Act (SEPA), to avoid an imminent threat to public health or safety, to prevent an imminent danger to public or private property, or to prevent an imminent threat of serious environmental degradation, shall be exempt from the provisions of that Act (see also BCC 22.02.050); and

WHEREAS, pursuant to RCW 36.70A.390 a public hearing must be held within 60 days of the passage of this ordinance; and

WHEREAS, the potential adverse impacts upon the public safety, welfare, and peace, as outlined herein, justify the declaration of an emergency; now, therefore,

THE CITY COUNCIL OF THE CITY OF BELLEVUE, WASHINGTON, DOES ORDAIN AS FOLLOWS:

Section 1. Section 20.20.140 of the Bellevue Land Use Code is hereby amended to revise the general development requirements applicable to "Boarding Houses and bed and breakfasts," to read as follows:

**20.20.140 Boarding/rooming houses and bed and breakfasts.**

Boarding/rooming houses and bed and breakfasts require a Home Occupation Permit, Part 20.30N LUC, approval. In addition, not more than two rooms may be rented to not more than two persons other than those occupying a single-family dwelling, provided there is compliance with health and building code requirements. The owner of the rooms to be rented shall provide off-street parking for such rooms at the rate of at least one parking stall for each room.

Section 2. Section 20.20.700 of the Bellevue Land Use Code is hereby deleted.

Section 3. Section 20.50.012 of the Bellevue Land Use Code is hereby amended to revise the definition of "Boarding House," to read as follows:

**20.50.012 B definitions.**

**Boarding/Rooming House.** A dwelling in which roomers and/or boarders individuals unrelated to the owner are housed and/or fed for profit for any time period, including stays of 30 days or more. This definition includes, but is not limited to, Transient Lodging as defined in LUC 20.50.048. (Refer to see-LUC 20.20.140 for General Development Requirements applicable to Boarding/Rooming House uses).

Section 4. Section 20.50.020 of the Bellevue Land Use Code is hereby amended to revise the definition of "Family," to read as follows:

**20.50.020 F definitions.**

**Family.** One or more adult persons related by blood, marriage, or legal adoption (but not more than six unrelated persons); or a group of not more than four unrelated adult persons living together as a single housekeeping unit in a dwelling unit. A group of more than four unrelated adult persons living together in a dwelling unit may also be included within the definition of "Family" if they demonstrate to the Director that they operate in a manner that is functionally equivalent to a Family. Factors that shall be considered by the Director include whether the group of more than four unrelated persons:

- a. Shares the entire dwelling unit or act as separate roomers;
- b. Includes minor, dependent children regularly residing in the household;
- c. Can produce proof of sharing expenses for food, rent, or ownership costs, utilities, and other household expenses;
- d. Shares common ownership of furniture and appliances among the members of the household;
- e. Constitutes a permanent living arrangement, and is not a framework for transient living;
- f. Maintains a stable composition that does not change from year to year or within the year;
- g. Is not a society, fraternity, sorority, lodge, organization or other group of students or other individuals where the common living arrangement or basis for the establishment of the housekeeping unit is temporary; or
- h. Can demonstrate any other factors reasonably related to whether or not the group of persons is the functional equivalent of a family.

For purposes of this definition and notwithstanding any other provision of this Code, children with familial status within the meaning of Title 42 United States Code, Section 3602(k) and persons with handicaps within the meaning of Title 42 United States Code, Section 3602(h) will not be counted as unrelated persons.

Section 5. Amortization for Certain Nonconforming Uses. Notwithstanding Section 20.20.560 of the Bellevue Land Use Code, any use of a structure or of land which does not conform to the regulations of the district in which the use exists due to changes in the definition of "Boarding/Rooming House" in Section 20.50.012 and/or "Family" in Section 20.50.020, adopted on September 23, 2013, which use lawfully existed on the date such changes became effective, shall be discontinued by July 1, 2014.

Section 6. Duration and Scope of Interim Regulations. The interim regulations imposed by this ordinance shall become effective on the date herein, and shall continue in effect for an initial period of sixty (60) days, unless repealed, extended, or modified by the City Council after subsequent public hearings and the entry of additional findings of fact pursuant to RCW 35A.63.220.

Section 7. Public Hearing. Pursuant to RCW 35A.63.220 and RCW 36.70A.390, the City Council shall hold a public hearing on this ordinance within sixty (60) days of its adoption, or no later than November 22, 2013, so as to hear and consider public comment and testimony regarding this ordinance. Following such hearing, the City Council may adopt additional findings of fact, and may extend the interim regulations for a period of up to six (6) months. If a period of more than six months is required to complete consideration of any changes to city codes, the Council may adopt additional extensions after any required public hearing, pursuant to RCW 35A.63.220 and RCW 36.70A.390.

Section 8. Permanent Regulations. The City Council hereby directs the staff to develop for its review and adoption permanent regulations to adopt the interim regulations adopted herein, and to transmit this ordinance to the Washington State Department of Commerce as required by law.

Section 9. Severability. If any section, subsection, paragraph, sentence, clause, or phrase of this ordinance is declared unconstitutional or invalid for any reason, such decision shall not affect the validity of the remaining parts of this ordinance.

Section 10. Public Emergency. The City Council hereby finds and declares that a public emergency exists and that this ordinance is a public emergency ordinance necessary for the protection of the public health and safety and should, therefore, take effect upon adoption. The facts upon which this public emergency is based include all recitals set out in this ordinance as well as those facts contained in the legislative record.

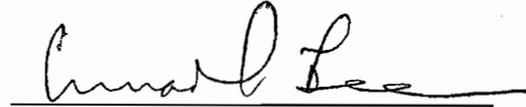
Section 11. Effective Date. In accordance with RCW 35A.13.190, this ordinance, as a public emergency ordinance, shall take effect and be in force immediately upon adoption by a majority plus one of the City Council.

1352-ORD  
09/19/13

# ORIGINAL

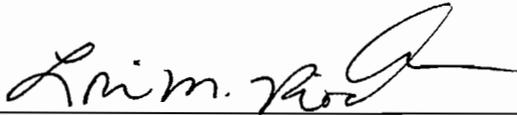
PASSED by the City Council this 23rd day of September,  
2013, and signed in authentication of its passage this 23rd day of  
September, 2013.

(SEAL)



Conrad Lee, Mayor

Approved as to form:



Lori M. Riordan, City Attorney

Attest:



Myrna L. Basich, City Clerk

Published September 26, 2013,



## Attachment C

Approved by Council on November 4, 2013

### Planning Commission Principles to Guide Development of Permanent Rental Housing Regulations

**Issue Presented:** Residents of the Spiritwood neighborhood have raised concerns about an emerging business model in their single family neighborhood where an ownership group is purchasing homes with the intention of renting out individual rooms under separate lease agreements. If this practice is not curtailed, impacts on neighborhood livability are anticipated to continue and to increase over time.

**Emergency Action Taken:** On September 23, the City Council adopted Ordinance No. 6128 as an emergency ordinance under the authority in Chapter 36.70A RCW and RCW 35A.13.190. This interim zoning control (1) deleted the general development regulations applicable to rooming houses; (2) clarified that boarding home performance criteria apply to rooming houses; (3) amended the definition of "Boarding House;" and (4) amended the definition of "Family" to address impacts resulting from the rental of multiple rooms in single family dwellings to unrelated individuals.

**Work Program Item:** The Planning Commission is being asked to develop narrowly tailored permanent amendments to the Land Use Code that address issues presented by the Spiritwood neighbors.

### Principles to Guide the Planning Commission Work

1. The Council-adopted emergency ordinance should be used as a starting point for the Planning Commission work.
2. Work on the code amendment should progress expeditiously, with the goal of having permanent regulations in place by July 2014.
3. The recommended amendments should be narrowly tailored to prevent the conversion of single family homes to dormitory-like uses. With this goal in mind, the regulations should seek to ensure that:
  - a. Impacts of unrelated persons occupying a rental house are not greater than the impacts associated with a group of related persons occupying a home.
  - b. Single family homes are not designed to support future conversion to dormitory-like uses.
  - c. Impediments are not created that would limit access to fair housing choices for protected classes of people.
  - d. Tools to limit impacts are capable of being enforced.
4. City-wide impacts of the permanent amendments should be evaluated to ensure that negative consequences on rental housing and appropriate housing design are minimized.
5. Work on the rental housing amendment should not be undertaken in a manner that will delay final completion of the Shoreline Master Program Update, and the City Council will consider extensions to the Emergency Rental Housing Ordinance if necessary to accommodate Planning Commission review of these permanent regulations.

6. Policy topics relating to housing affordability and availability are part of a longer term strategy that should not be undertaken during current development of the narrowly tailored amendments contemplated to address the Spiritwood issue. The Comprehensive Plan Update that is currently underway and expected to result in additional code development work late in 2014 is the proper forum to discuss broader policies such as:
  - a. Placing limits on garage conversions for living space;
  - b. Adopting additional single room occupancy regulations;
  - c. Evaluating the appropriate role of detached accessory dwelling units in the provision of fair housing choices;
  - d. Evaluating the single family home definition to ensure that it is appropriately specific to foster development of desired housing options without encouraging the commercial use of housing in single family neighborhoods;
  - e. Addressing “apodments” and micro-housing development trends; and
  - f. Considering the role of rental registration and inspection program options as a viable enforcement strategy.