



Fauntleroy Community Association  
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June 24, 2018

To: City of Seattle ([ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov))

Subject: Letter of Comment regarding ADU DEIS issued May 10, 2018

The Fauntleroy Community Association (FCA) supports land use policies that:

- retain the character of our Fauntleroy neighborhood and businesses,
- provide for affordable housing, with fair allocations for growth and density,
- concurrently develop infrastructure, including transit, utilities, green spaces, parks & other amenities to serve our growing community and promote urban livability.

Founded in 1980, the Fauntleroy Community Association has historically dealt with traffic, parking, pollution, and other topics related to the existence of the ferry dock in our community. Over the years, our activities have expanded to include restoration of salmon habitat in Fauntleroy Creek and the cove, local parks and playgrounds, crime and public safety, traffic issues as they affect all of West Seattle, involvement in transportation-related committees and meetings, and many other topics including flags for the crosswalks and the purchase and planting of containers on the block supporting the Fauntleroy small businesses. We sponsor two local festivals and issue quarterly newsletters for 400 member households, businesses and supporters. The community finds enough value in the FCA that they are willing to pay annual dues to maintain and further these activities.

We support the current zoning for ADUs in Seattle. We understand the current rules were the result of the Seattle Planning Commission working closely with professionals and Seattle citizens. We believe they strike a fair balance between increased density and impacts to the single family zoned property. Specifically:

1. The parcel must at least be 4,000 square feet and only one ADU is allowed.
2. The owner must live on the site for certain periods and
3. An offstreet parking spot must be provided.

The proposed changes do not do not strike a fair balance between increasing density and impacts to single family zoning. The subject DEIS fails to comprehensively and honestly analyze the impacts from rezoning of one half the land area of the City of Seattle, upzoning every single family neighborhood into multi-family properties and fails to recognize the unique qualities,

limitations and opportunities within Seattle's neighborhoods. In addition, the marketing of the ADU as an affordable place to live, e.g., below market, is disingenuous.

### Parcel Size

The proposed changes reduce the minimum lot size and allow for more than one ADU per property. Height limits are increased and the maximum square footage of the property that the ADUs may occupy is increased.

We do not see how the DEIS addresses tree canopy, runoff and other biomass issues.

We note Seattle's goal, established in 2007, is to reach 30% tree canopy cover by 2037 with the City's most recent canopy cover study, using data from 2016, finding that 28% of Seattle is covered with trees. The majority of Seattle's urban trees are found in residential areas (representing 67% of the land with 72% of Seattle's tree canopy). Removing tree canopy to accommodate multi-structures in a single family parcel is ironic given that these parcels are carrying the tree canopy goals for the City.

We already have serious water runoff and slide problems in West Seattle. There needs to be an evaluation of water run off due to an increase in impermeable surfaces and re-establishment of any lost biomass as a result of cutting down trees and shrubs to build these new ADUs. The City and County have spent millions of dollars to create rain water gardens, expand and rebuild of the Metro overflow capacity at Lowman Beach and Barton Street pump stations, rebuild roads due to slides and encourage private rain water collection systems. There needs to be serious evaluation and off sets for the impervious surfaces created by ADUs. The same hold for a loss of biomass. We preserve trees and shrubs on private residences, plant street trees, fine people who cut down trees and shrubs on City property all because we are trying to preserve biomass to deal with global warming and clean air. Consideration needs to be given to a requirement to re-establish biomass removed or destroyed by the addition of ADUs.

### Affordability

Just as other West Seattle Peninsula neighborhoods and Seattle neighborhoods in general, we want to see a plan that encourages creation of livable, affordable communities. The DEIS does not address affordability issues.

Once single family residences are rezoned to accommodate multiple ADUs, the value in the parcel, over time, will be by reference to the future use zoning as opposed to the single family use. Property taxes will rise for these parcels based on their future use value. That can lead to displacement and a slowing in the economy as purchasing power erodes.

In addition, the City has marketed these units as easing the affordability crisis, e.g., rent is below market. We do not understand why a homeowner would be expected to charge less than market. Construction costs, permits, in particular, the City's scheduled cost to install an additional sewer line are expensive. The owner must charge enough to cover construction, potential debt service and the higher property taxes. We note Mayor Durkin wishes to expedite ADU permitting but nonetheless, the owner will charge based on the cost incurred as well as what the market will bear.

### Parking

The DEIS does not adequately address parking issues. Residents of ADUs constructed without an off-street parking spot will have no choice but to park on the street. This will create a safety issue as well as a capacity issue.

FCA recently filed a Freedom of Information request with the Seattle Police Department for data around car prowls and burglary. Based on data for the last two years, cars are 5 times more likely to be prowled or burglarized if they are parked on the street rather than in a driveway. If Seattle is to move to a model where off-street parking is not required, we would expect the City to address this issue and provide deterrents.

Fauntleroy residents recently responded to an FCA sponsored survey covering housing, parking, environmental and other issues. 84% or 366 of 436 respondents did not support ADUs without off-street parking. This was not an unexpected response as there is a significant parking issue in this community. Residents compete for parking with users of the Fauntleroy Ferry and the Rapid Ride C Line. This includes ferry crews, Car2Go, foot passengers wanting to avoid the auto charge, students attending school on Vashon and the bus commuters all looking to park their cars in the Fauntleroy neighborhood. In addition, the ferry queue uses Lincoln Park street parking as the means to wait for the ferry in the afternoon and evening. Once Lincoln Park parking lots are full, visitors park in the neighborhood. Although Fauntleroy is designated a Restricted Parking Zone allowing permitted resident only parking between 2:00 a.m. and 5:00 a.m., permits were also issued to the crews and Car2Go, and resident parking was adversely impacted.

The parking issue is not restricted just to the residents in Fauntleroy. Merchants in the Fauntleroy Endolyne Triangle business area hear daily complaints from their customers that there is inadequate parking. Further parking pressure will result in lost business for them because anyone living beyond walking distance of these merchants will just choose to go somewhere else.

These parking issues are similar to those experienced by Alki residents due to the attraction of the beach and the many amenities in this area. The City enacted parking ordinances for Alki requiring developers to provide 1.5 offstreet parking spots for each dwelling unit. This spring, the City passed similar legislation for Fauntleroy to mitigate the pressures on neighborhood parking. Similar to Alki, one off-street parking space per dwelling unit or 1 space for each 2 small efficiency dwelling units for new development within 1,320 feet of the Fauntleroy Ferry Terminal is required. It is unclear how this ordinance will be applied with respect to ADUs.

If the city goes forward with this change, the FCA requests that neighborhoods built around a destination attracting non-resident cars, such as a ferry dock, be exempt and the requirement for off street parking is maintained.

### Summary

Similar to other West Seattle Peninsula neighborhoods and Seattle neighborhoods, we want to see a plan that encourages creation of livable, affordable communities; a plan that preserves the small town character that keeps West Seattle such an attractive place to work and live. Fauntleroy supports policies that fairly balance density with single family residences.

The current ADU zoning is balanced and we urge the City to continue with the current ADU rules. Thank you for the opportunity to comment on the proposed rules.

Thank you.

Sincerely,

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