UNIVERSITY PARK COMMUNITY CLUB

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March 21, 2019

TO: Seattle City Council

FROM: The University Park Community Club

RE: In support of the Queen Anne Community Council Appeal

Dear City Council Members:

Seattle Neighborhoods may be unique and often self-protecting, but when the City proposes legislation seeking to destroy their integrity, it is time for them to unite in opposition. Such a situation now faces all city neighborhoods, as the City of Seattle is poised to eliminate many of the practical and successful restrictions on accessory dwelling units, and to do so citywide. The fact is, the City was almost successful! The excuse given for not developing an Environmental Impact Statement (EIS) was simple: there will be “no impact!”. So, if it were not for the Queen Anne Community Council and its rapid response to a lacking EIS, we would not have had this opportunity to make our case.

The University Park Community Club (UPCC) hereby stands as a stanch ally in support of the Queen Anne Community Council and its appeal before the hearing examiner.

But, before we delve into the details, let’s ask the City what prompted this proposed change. Here is the response: ***“These action alternatives address regulations and policies frequently cited as barriers to the creation of ADUs.”*** Notice the passive voice, which purposefully obscures the real promoters of this legislation.

Since it is impossible and inappropriate to represent the concerns of other neighborhoods, we wish to address the more egregious changes that will have the greatest negative impact on University Park, should this proposal be enacted into law, aswritten:

1. **The one-size-fits-all legislation:** This approach is filled with erroneous assumptions. The many neighborhoods in Seattle are all unique, with individual issues and concerns. As a result, how the proposed changes affect each neighborhood will likewise be unique. Although we cannot represent all neighborhoods, we can discuss the concerns that are specific to our neighborhood**.** University Park Neighborhood is already dealing with pressures from within and without - issues which City Officials have failed to acknowledge: saturated housing owned by absentee landlords, along with the accompanying social ills, such as garbage, violence, parties, parking violations, drugs, etc. Instead, the City parades us out as an example of a typical single-family neighborhood with neat rows of family homes, priced well above many families’ incomes, and surrounded by large gardens – wasted land that must be reallocated for fill-in housing. The City fails to acknowledge the reality behind the façade which is observed from the streetscape. Many of our homes have been purchased by aggressive and even foreign developers and speculators, who have the deep pockets to outbid the middle-class families who would love to move into our neighborhood. Most of these houses have been chopped up into small dormitory-sized units for student housing – with a legal limit of eight (8) unrelated adults, although enforcement is not strict.

One of the most basic flaws in the EIS conclusion results from false data: The City failed to take a true snapshot of each neighborhood as a baseline, in order to honestly assess the effect of its legislation on that particular neighborhood. The City’s documentation of current situations and issues is as vague and generalized as their premature, yet hopeful proclamation of the positive results expect from the new legislation. Why? Because a truly honest assessment of present conditions in each neighborhood is incongruent with the City’s desire to create a simple overall master plan for the entire city.

Here are some vital statistics of University Park Neighborhood that were conveniently ignored during the creation of this radical legislation:

* Statistics document that approximately 6,000 students live in the off-campus area north of 45th Street; and that 3,000 of those students reside in the University Park Neighborhood, a cluster of single-family styled homes, which runs from 16th Ave NE to 21st Ave NE, and from NE 50th Street to Ravenna Park.
* Historically, University Park Neighborhood was platted into small, narrow parcels (approximately 4,000 square feet). To maximize the use of these narrow lots, the infrastructure was engineered, designed, and constructed, and ultimately sized to accommodate one single-family house per lot, through creative architectural adaptations. For example, Dutch Colonial homes were turned sideways. The City of Seattle even acknowledges this built-in density within the Department of Planning Website:

***“One distinctive feature of the University Park neighborhood is its very narrow lots. The Moore Investment Company, which platted it, apparently wanted to maximize its profits by creating small lots, most of which were under 4,500 square feet. Fairly substantial houses were still built on these relatively small lots.”***

1. **The removal of the off-street parking requirements**: This is another example of the City’s false assumptions, based on a lack of honest data regarding present circumstances. Again, the City fails to document the current lack of parking spaces in our University Park Neighborhood, although we are a recipient of the RPZ permits, which are provided under these regulations: “***The RPZ program was created to help ease parking congestion in residential neighborhoods around significant demand generators, while balancing the needs of all people to be able to use the public streets.”*** Presently, the City states that more RPZ permits are given out in our neighborhood than there are parking spaces on our city blocks. If our parking spaces are so much in demand now, think about how much of a negative impact will occur should the City eliminate the requirement for off-street parking. This increase will further swell when the maximum number of residents per lot is increased to twelve (12) unrelated adults.
2. **The removal of the owner occupancy requirement:**When asked how the elimination of owner occupancy will be a positive change, the only examples provided by City Officials were those involving owner occupied properties.  Unfortunately, the elimination of this restriction will only encourage aggressive speculation: developers will maximize their invasion into family neighborhoods, as soon as they realize how easy it will be to turn their properties from single-family into triplexes, thus tripling their profits.   In return, they are not required to add a single unit to the affordable housing stock, a reality finally acknowledge by the City when it ***“removed all claims of “affordability” attached to their legislation and the EIS.”*** (Queen Anne appeal website: https://queenanneappeal.org/)

In addition, the increased number of absentee landlord rentals will only exasperate presently unaddressed issues. During the mid-1900s, many older homeowners rented to students after their children left the nest. But they still resided in the house and kept a short rein on their tenants. However, the situation is radically changing, as those rooming houses are being replaced by houses which are rented to groups of students without any on-site supervision. Often, the house is leased to one person, who, in turn, subleases the rooms to as many as he can, often exceeding the maximum of eight (8) unrelated adults, a situation that is not even being monitored by the City. Consequently, any “official” inventory of dwelling units is misleading, drastically underestimating the true total number of residents in our community. If the City were to gather honest data, it would reveal that University Park is actually one of the densest family neighborhoods in Seattle. And, if City Officials were honestly reflective, our current condition should be viewed as a warning to them about high-risk neighborhoods and the potentially negative impacts resulting from the elimination of the owner-occupancy requirements – a restriction that was deliberately inserted into the original law in order to protect those same neighborhoods.

Bottom line, if the City of Seattle still wants to pursue this radical course as a positive solution to its housing shortages, and if wants a glimpse into the future, well the future is here and now in the University Park Neighborhood and it is not looking good!

1. **Is there a real need for these additional housing units in single family neighborhoods?** This is a quandary facing City Officials indeed. It is still unclear why these changes are necessary. Projections have already predicted that Seattle is on track to meet and even outpace the demands from the expected population growth, without passing this legislation.
2. **Opposition to this legislation is NOT equivalent to opposition to any and all updates to the current ADU/DADU regulations:** It is unfortunate that the City often dismisses our specific concerns, while asserting that the UPCC is opposed to any form of accessory dwelling units. This is far from the truth, but it does fit the City’s agenda to go after single family neighborhoods with a vengeance. University Park encourages ADUs on owner-occupied properties, as is allowed under current law; in fact, some of its members have such rental units on their properties.

However, the benefits of these drastic revisions as drafted by the City seem to be skewed toward absentee landlords and speculators and away from those homeowners who might welcome certain practical, but limited revisions to the present ADU/DADU regulations, giving them greater access to accessory dwelling units in order to support their families and help pay the monthly mortgage bills and property taxes.   Streamlining the entire process may be a practical solution to this dilemma.

1. **The city should anticipate increasing pressures on current infrastructure:** We simply pose this question: how will Seattle address the need for infrastructural improvements to meet the demandsof the rapidly growing population? Who will be responsible for paying for these improvements?
2. **The City of Seattle sold the Up-zone as the panacea for lack of housing:** Seattle informed us that the Up-Zone would be confined to those areas surrounding the Light Rail Stations and other transit centers. That ordinance even included a buffer between the up-zoned areas and the surrounding family neighborhoods – a transitional zone, which would gradually reduce the height and bulk on adjacent city blocks. But, as predicted, these transitional zones have already been violated by recent permits, leaving no safety zone. Now, with the introduction of new ADU and DADU regulations, the invasion will be completed. Since the City could not eliminate the single-family neighborhoods in name, they decided to undermine them from within.
3. **The loss of Seattle’s unique neighborhoods:** The vibrancy of Seattle cannot be quantified by the number of affordable units, the density of housing, and other statistics. Seattle’s history is more than the sum of these factors; it was always and should always remain wrapped around its robust and eclectic neighborhoods. What will happen to Seattle should this city-wide legislation fail to recognize the peculiar issues facing these many communities? **The year 2019 marks the 150-year history of incorporated Seattle (1869 – 2019). Let’s pivot to meaningful change that supports and promotes the unique neighborhoods that gave Seattle its quirky personality.**

There are many other specific changes contained in the ADU/DADU proposal which we believe will be detrimental to the well-being of our neighborhoods, but these represent our main challenges. It is our hope that this pause in the legislative process will enable City Officials to honestly reflect on our concerns as outlined in this letter before making a final decision, one that could irreversibly alter the course of Seattle into the future.

UPCC appreciates the opportunity to show our support for the upcoming appeal and we hope that these comments are seriously considered during the process.

Respectfully,

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UPCC board secretary

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CC: Seattle Mayor Jenny Durkan

 Queen Anne Community Council (through its website devoted to the appeal)

 Martin Henry Kaplan

 Queen Anne Community Council chair: Ellen Monrad