

December 5, 2022

City of Everett Planning Commission,

Re: Accessory Dwelling Unit Standards

Dear Planning Commissioners,

I'm sorry for getting my comments to you so late in your review of ADUs.

### **New Curb Cuts and Driveways From the Street on Alley Lots**

On Monday I sent a letter to Mayor Franklin, City Council, and Planning Commission regarding my concerns with allowing driveway access off the street, when parking from the alley is available. Please make that letter part of the record for comments on the ADU code amendments.

I'm especially concerned that code amendments that allow up to two accessory dwelling units per residence (with or without required parking) will result in many additional driveways off of the street in north Everett on alley lots. I think the current interpretation by Public Works staff is that if someone wants more parking than is available off of the alley, they will grant a permit for access from the street.

I see two scenarios that could frequently occur on alley lots. The first is that parking is not required for an ADU and an owner builds one or two ADUs on the alley with no parking. Later they decide that they just want more parking, but there's no more room off the alley (because they already have the ADU and parking for the primary residence there), so they request a driveway from the street. The second scenario is that parking is required for the ADU(s) and the property already has sheds, garages, greenhouses, etc. that block access from the alley, so they request parking off of the street as part of the development of the ADU(s). Both of these scenarios would result in dramatic changes to the character of the north Everett neighborhood with alley lots. Garages facing the street and parking in front yards could become the norm. In addition, every time a property gets a driveway, it takes away from shared public on-street parking, which could create demand for others to request additional driveways from the street.

Previously (pre-Covid) Everett had meetings on proposed code amendments to allow higher densities near transit corridors, such as Broadway Ave. All of the proposed options emphasized that parking would be from alleys to maintain the street character, where alleys existed. Because home values have gone up so much, I think north Everett is likely to see more development of ADUs rather than redevelopment with townhouses, etc. in the next 10 years plus. I'd like the ADU regulations to be at least as protective of neighborhood character as the townhouses I see coming in the future.

I request that you wait to amend the zoning code regulations for ADUs until you can also revise the standards for Driveway Access in EMC Chapter 19.34.110 to eliminate new secondary driveways from the street on alley lots (I'd keep the same exceptions in the code for topographical constraints and safety issues). If the owner has constructed improvements on the alley like sheds and greenhouses, they should be required to remove those and construct parking off the alley when they add ADUs that require parking.

### **Design Standards in Chapter 19.08.100(B)(3)**

I'm very concerned that all of the design standards for ADUs are proposed to be eliminated. I request that design standards still apply when ADUs are visible from the street. My December 4 letter included a photo of the garage/future ADU constructed at 1617 Oakes Ave. I know they had to comply with the height limits for a garage, but the roof design is not consistent with the character of the neighborhood and glaringly stands out. Having basic regulations for design is critical to maintaining neighborhood character.

### **Section 19.08.100(A)(3) ADU Size**

This section would allow unlimited gross floor area for an ADU within one floor of a principal dwelling unit. This is not consistent with the definition of an ADU. The definition (EMC19.04.050) states that the ADU has to be subordinate to the permitted principal dwelling unit or units located on the same lot. If there are 2 floors that are the same size, the second floor cannot be considered subordinate. It would be a duplex, and duplex standards should apply. This provision should be removed from the code amendment.

Thank you for considering my comments.

Mary Cunningham  
1605 Oakes Ave  
Everett, WA 98201