

## Fw: Support for Accessory Dwelling Units

Christy Schwengel <cschwengel@yahoo.com>

Sat 12/19/2020 9:23 PM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Planning Commission,

Thank you for your consideration of Accessory Dwelling Units in the City of Alexandria. We strongly support the ADU proposal and hope it can be approved by the City Council in January.

We think the City has done a very thorough process (over quite a period of time) and hope the proposal can move forward without delay.

We postponed our long-planned home renovation in anticipation of an ADU policy being adopted, and we hope to get going soon. We believe an ADU will make better use of an underutilized space and provide great flexibility for our family and our community.

If I can be helpful, please let me know.

Thank you again for your service to Alexandria!

Warmly,  
Christy Schwengel  
504 Upland Place

----- Forwarded Message -----

**From:** Christy Schwengel <cschwengel@yahoo.com>

**To:** PlanComm@alexandriava.gov <PlanComm@alexandriava.gov>

**Sent:** Wednesday, November 4, 2020, 11:52:20 PM EST

**Subject:** Support for Accessory Dwelling Units

Dear Planning Commission,

My name is Christy Schwengel at 504 Upland Place.

My husband Robert and I just wanted to offer some thoughts in regards to a topic coming before the Planning Commission and City Council.

We strongly endorse the City moving forward on Accessory Dwelling Units. We have an old garage with some finished space above it in our backyard. It isn't well built or well insulated or very functional, but we'd be very interested in tearing it down to build an ADU in 2021.

We think that it would be very beneficial to us. It could offer many options over the years -- for example: income for us, or lodging for grandparents, or lodging for caregivers of elderly family members.

More importantly, we think an ADU would be beneficial to the community. We are walking distance to the King Street metro and multiple schools. We would be very interested in providing housing for some key members of the workforce who aren't paid enough (ex: new teachers or para professionals) and frequently have trouble finding affordable housing.

Also, I work for Green America and care about the environmental implications of our decisions. I think creating housing out of underutilized spaces is a low-impact solution to our area's

housing challenges.

I've talked to three of our closest neighbors. They were all very supportive and several even said that they might be interested in turning some of their underutilized spaces (ex: basements) into ADUs.

We are hoping the City approves the ADU recommendations and moves forward with speed. We are ready and excited to create an ADU!

Thanks for your service!

Warmly,  
Christy Schwengel and Robert Knotts  
504 Upland Pl.  
Alexandria, VA 22301

**[EXTERNAL]Support for Item 6 - Zoning Text Amendment #2020-00007**

Jessica Cummings <jessicaccummings@gmail.com>

Tue 12/29/2020 3:21 PM

To: PlanComm <PlanComm@alexandriava.gov>

Dear Planning Commission,

As new owners in the Del Ray neighborhood, we write to express support of the proposed text amendment regarding accessory dwelling units, as written and submitted for the January 5 meeting. The current policy recommendations will allow us to finish our English basement into a nice studio apartment for a long term tenant.

We believe the recommendations allow necessary flexibility for homeowners while also protecting community interests in affordable housing and neighborhood character. We support non-regulation on certain items like additional parking and owner occupancy, as well as the reasonable restrictions on size and height of newly purpose built accessory structures.

We thank the staff for their hard work on this policy and look forward to its implementation.

Regards,  
Jessica and Peter Davies

---

**DISCLAIMER: This message was sent from outside the City of Alexandria email system.  
DO NOT CLICK any links or download attachments unless the contents are from a trusted source.**

Re: [EXTERNAL]20-00035004 - Open - COU-Contact Mayor, Vice Mayor and/or City Council -

J. GLENN EUGSTER <glenn\_eugster@comcast.net>

Mon 1/4/2021 7:09 AM

To: PlanComm <PlanComm@alexandriava.gov>

City of Alexandria, VA. Planning Commission Members,

I didn't see many comments in the staff report on Accessory Dwelling Units. Here are our comments to the Vice Mayor about the proposal to eliminate single family zoning in Alexandria, VA. Please know that we are concerned about what city leaders are proposing. We hope that you and the other city leaders will have more discussions with communities about this proposal before you act on it. Thank you.

Sincerely,

J. Glenn Eugster & Deborah Weatherly

----- Original Message -----

From: "glenn\_eugster@comcast.net" <glenn\_eugster@comcast.net>

To: Elizabeth Bennett-Parker <elizabeth.bennettparker@alexandriava.gov>

Date: 12/15/2020 7:56 AM

Subject: Re: [EXTERNAL]20-00035004 - Open - COU-Contact Mayor, Vice Mayor and/or City Council -

Dear Vice Mayor Bennett-Parker,

Thank you for replying to my email. I started following the ADU initiative when I saw an advertisement for a housing summit earlier this year. I researched the topic, the speakers and various public statements made by City of Alexandria leaders including yourself. As the proposal moved forward I did more research to try to learn more about the city's motivation.

Although I'm not a life-long resident of Alexandria I have been engaged in several aspects of racism within the city including Fort Ward Park, and the American Legion Post/ Carver School Building. I also assisted many of my neighbors to form the Fort Ward & Seminary African American Descendants Society, Inc. and briefly served on the Seminary Hill Association, Inc. board. Since arriving in Alexandria in 1989 I've observed, listened and learned about our history, race-relations, and the differences and similarities we share. Although I'm not an expert in these matters I'm not a rookie either.

My comments reflect what I know about the City's proposal to eliminate single family zoning in Alexandria. Comments that you, the Mayor, and many of those involved in crafting the ADU proposal, indicate that city leaders are changing single family zoning because you believe it is racist, evidence of systemic racism in our city, and part of white supremacy. Since my wife and I are white and live within a single family subdivision with the City of Alexandria the comments of city leaders and the ADU initiative are aimed at white families and single family homes like ours.

Many residents of the city are concerned about the proposal moving forward but are uneasy about weighing into this discussion. This year has been tough and I believe our community

does not want to see more division. The comments that you and the Mayor made after George Floyd was murdered were filled with anger which I can understand. However, both of you are leaders of our city and in making changes you need to realize that if you paint in a broad-brush, blaming people for the sins of our past it further divides us. Your challenge frankly is getting to yes on very complicated matters.

My hope is that city leaders reach out to those impacted by these proposed changes letting them know that this is not about a "granny cottage" but about anti-racism. I also hope that you slow this process down because Alexandria is different than the others places that have abolished single family zoning. As a resident you know that this is about who we were, are, and will be.

Should you wish to meet with residents of our community, which include Councilwoman Amy Jackson, please let me know. When we have dialogued with city leaders in the past, on Fort Ward, crime, and other issues, we have always come away with better solutions.

Enjoy and be safe.

Sincerely,

Glenn

J. Glenn Eugster  
4022 Ellicott Street  
Alexandria, VA. 22304

On 12/10/2020 10:20 PM Elizabeth Bennett-Parker  
<elizabeth.bennettparker@alexandriava.gov> wrote:

Dear Mr. Eugster,

Thank you for your email regarding ADUs. I read the article link you provided and I did not see anything that suggested you or your neighborhood were racist – will you share with me where you read that?

Warmly,

Elizabeth

Elizabeth Bennett-Parker

Vice Mayor

City of Alexandria

Aide: Cassidy Ketchem

Cassidy.ketchem@alexandriava.gov

571.414.1627

**From:** noreply@salesforce.com <noreply@salesforce.com> on behalf of Alex311 <alex311@alexandriava.gov>  
**Sent:** Wednesday, December 2, 2020 12:26 PM  
**To:** Cassidy Ketchem <Cassidy.Ketchem@alexandriava.gov>; Elizabeth Bennett-Parker <elizabeth.bennettparker@alexandriava.gov>; CRM Administrator <CRM.Administrator@alexandriava.gov>  
**Subject:** [EXTERNAL]20-00035004 - Open - COU-Contact Mayor, Vice Mayor and/or City Council -

COU-Contact Mayor, Vice Mayor and/or City Council (20-00035004) service request has been created, updated, and/or requires your attention.

<b>Service Request Type:</b>	COU-Contact Mayor, Vice Mayor and/or City Council	<b>Status:</b>	Open
<b>Service Request Number:</b>	20-00035004	<b>Created By:</b>	Customer Site Guest User
<b>Priority:</b>	Standard	<b>SLA Detail:</b>	5 Business Days
<b>Method Received:</b>	Web	<b>Submitted On:</b>	12/2/2020 12:24 PM
<b>Location:</b>		<b>Overdue On:</b>	12/9/2020 12:24 PM
<b>Description:</b>	<p>Date: 12/02/2020 11:45 AM Subject: Alexandria Refines Accessory Dwelling Units Policy and Cuts Parking Requirement Heads-Up! The Mayor and City Council are moving the proposal described below to increase housing and density in Alexandria. At least part of this is targeting single-family residential areas like those in and around Seminary Hill. Many believe that this will help with opportunities for affordable housing. However, speakers from afar who helped launch this idea in Alexandria believe that "single-family residential areas are racist". If this is approved it will adversely impact parking, road-congestion, stormwater runoff, schools and other public services. Increasing density at a time when we are trying to fight the virus doesn't seem to make sense. Setback requirements between building on adjoining properties is proposed to be five feet in the future. Additional parking areas may be required on properties and green space will be reduced. You may have already participated in the city's engagement process and shared your thoughts. Frankly ideas that may be working in other countries and, or California, may not be appropriate for Alexandria. My sense is that this proposal requires further</p>		

study before City leaders push it forward. It also might make good sense if several properties could be selected voluntarily to serve as a case study to better understand, on-the-ground, how this might work. When I read that my home and neighborhood was racist it caused me to pause. My wife and I have worked very hard all our lives so that we could live in Marlboro Estates. I found it offensive to learn that because we were able to select our home we are racist. My time in the City of Alexandria has shown many city leaders and neighbors that my wife and I are not racist and have tried to help others to reverse the collective sins of our past. I am a first-born American, on my father's side of the family, and when my relatives came here choices like the ones we have made were a part of our American dream. This is a time when you may want to share your thoughts with the Mayor and City Council. Sincerely, Glenn J. Glenn Eugster Ellicott Street, Alexandria, VA. Alexandria Refines Accessory Dwelling Units Policy and Cuts Parking Requirement [https://www.alxnow.com/2020/12/02/alexandria-could-open-accessory-dwelling-units-to-short-term-rental/?fbclid=IwAR2gl2\\_b7GRzDqlG\\_AwPhF09XUg9k99MAC5VTAF28ECTN\\_SMQLdDCFbmbps](https://www.alxnow.com/2020/12/02/alexandria-could-open-accessory-dwelling-units-to-short-term-rental/?fbclid=IwAR2gl2_b7GRzDqlG_AwPhF09XUg9k99MAC5VTAF28ECTN_SMQLdDCFbmbps)

### Contact Information:

<b>Name:</b>	Joseph Glenn Eugster	<b>Primary Phone:</b>	+1 (703) 489-1140
<b>Email:</b>	glenn_eugster@comcast.net	<b>Social Persona:</b>	

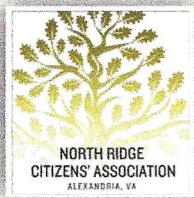
ref:\_00D1UtpPp.\_5001UfhzcJ:ref

### Service Questions:

Question	Answer
Which Council Member would you like to contact?	Vice Mayor - Elizabeth B. Bennett-Parker
What is the nature of your request?	Other
Is your request related to the upcoming public hearing or Council meeting?	Yes

**DISCLAIMER:** This message was sent from outside the City of Alexandria email system. DO NOT CLICK any links or download attachments unless the contents are from a trusted source.

 [Six Steps to Stop the Spread image](#) ---



NRCA, P.O. Box 3242, Alexandria, VA 22302

January 4, 2021

Planning Commission  
c/o Department of Planning & Zoning  
P.O. Box 178  
Alexandria, VA 22314

Delivered Via Email: [PlanComm@alexandriava.gov](mailto:PlanComm@alexandriava.gov)

**Re: Accessory Dwelling Units (ADUs)—Revised Proposed Policy**

The North Ridge Citizens' Association (NRCA) appreciated the opportunity to comment on the City's October 2020 draft policy to allow for accessory dwelling units (ADUs). In its November 6, 2020 letter (Attachment #3 to the Staff Report), NRCA supported eight reasonable restrictions and prohibitions on ADUs that had been proposed in the October 2020 draft (see p. 1 of NRCA's November 6, 2020 letter) but opposed four other provisions that were too lax. Further, NRCA proposed that the policy be strengthened by including several additional reasonable limits on ADUs that had not been included in the October draft.

We are very disappointed that the vast majority of NRCA's comments and proposals were not included in the current version of the policy. In fact, the Staff Report on the policy fails to adequately consider or respond to most of NRCA's comments. Moreover, the Staff Report (p. 9) mischaracterizes NRCA's comments, by incorrectly stating that "North Ridge Citizens Association has submitted a statement in general support of ADU policy but none of the specific draft recommendations staff released in October."

NRCA states for the record that the cohesive set of comments in its November 6 letter were intended to identify the basic elements of a reasonable ADU policy and, specifically, the provisions that need to be included and those that should not be included. Because none of the provisions that NRCA opposed were removed, none of the provisions NRCA supported adding were added, and nearly all of the necessary and fundamental limits and prohibitions on ADUs—especially the owner-occupancy and common-ownership requirements and the prohibition against concurrent short-term rentals, which are of greatest concern to our Board members—were removed, NRCA cannot support the policy now before the Commission. We urge the City to defer any action on the proposed policy pending reconsideration of NRCA's and other public comments.

Sincerely,

Chuck Kent  
President  
NRCA

cc: Mayor  
City Council Members  
City Manager



# City of Alexandria, Virginia

## MEMORANDUM

DATE: DECEMBER 31, 2020

TO: CHAIR AND MEMBERS OF THE PLANNING COMMISSION

FROM: KARL W. MORITZ, DIRECTOR, DEPARTMENT OF PLANNING & ZONING

SUBJECT: ACCESSORY DWELLING UNIT (ADU) TEXT AMENDMENT

---

This memorandum provides additional staff response to community feedback received. The following policy recommendations were made by the community. Staff responses follow.

1. REQUIRE NEIGHBOR NOTIFICATION FOR DETACHED ADU CONSTRUCTION AND PROVIDE PUBLIC COMMENT PERIOD.

Staff feels that the proposed height, size and use limitations would adequately protect neighborhoods from ADU construction impacts. Staff is not opposed to a notification requirement but feels that a public comment period would not be appropriate. Public comment is appropriate in cases where a board, such as Planning Commission or City Council, has discretion in their approvals. For ADUs, staff could not legally compel a homeowner constructing an ADU to address comments provided by neighbors that are beyond what the proposed regulations would require. Furthermore, a period of public notification is not required for a home addition, garage, shed, guesthouse or other accessory structure that could have the same or substantially larger impact than an ADU.

2. ELIMINATE ADU SIZE LIMIT RELATIVE TO SIZE OF PRINCIPAL DWELLING.

For a detached ADU to appear subordinate and be compatible with the City's neighborhoods, it must be smaller than the principal dwelling. The Zoning Ordinance generally quantifies a use or structure as accessory when it occupies less than one-third of the area or size of the principal use or structure. Under the proposal, the principal dwelling's first floor must be at least 1,500 square feet to construct an ADU larger than 500 square feet. In staff's experience, dwellings of this size are generally located on lots that are large enough that an ADU greater than 500 square feet would still be compatible with its surroundings.

3. REQUIRE ADUS WITHIN THE NATIONAL REGISTER HISTORIC DISTRICTS TO RECEIVE BOARD OF ARCHITECTURAL REVIEW (BAR) APPROVAL.

The Zoning Ordinance does not currently authorize the BAR to hear cases within the City's

National Register Historic Districts (Rosemont and Town of Potomac). Structures within these districts are classified on the National Register as either “contributing” or “non-contributing” based on historical significance. The construction of a detached ADU would not affect the contributing status and historical significance of the principal dwelling. ADU’s constructed within locally designated historic districts, including the Old and Historic District and Parker-Gray will be required to obtain BAR approval prior to construction.

4. PROHIBIT DETACHED ADUS ON SUBSTANDARD LOTS.

Staff feels that prohibiting detached ADUs would not be fair to residents with smaller lots. Under current regulations, detached structures, including garages, sheds, guest houses, etc. can be constructed on substandard lots if the proposal meets required setbacks and floor area. Staff feels that the protections provided by Zoning Ordinance Section 12-900 in addition to the proposed ADU regulations would sufficiently address concerns related to ADU construction on substandard lots.

5. PROHIBIT SUBDIVISIONS FOR PROPERTIES DEVELOPED WITH ADUS.

For a subdivision to be approved, the proposed lots must meet all lot requirements for the zone in which the property is located including lot size, width, street frontage, etc. An existing lot must be at least twice as large and twice as wide as the minimum lot size and width requirements, in addition to other considerations, to qualify for a subdivision. Most lots that would be developed with an ADU could not be legally subdivided because they would not meet the subdivision and lot requirements.

6. ADU OCCUPANTS MUST BE RELATED OR PROVIDING CARE TO OCCUPANTS OF PRINCIPAL DWELLING.

The Zoning Ordinance currently allows family members or caregivers to live in a detached structure as long it does not contain a kitchen. Staff feels that limiting ADU occupants in this manner would not serve to accomplish the goal of creating additional, flexible dwelling units within the City. Additionally, enforcement of such a provision would be challenging given the difficulty in documenting family relations or caretaker status.

7. REQUIRE SPECIAL USE PERMIT (SUP) FOR ADU DEVELOPMENT.

Staff originally considered a public hearing process for ADUs. Our research found that the additional expense, time and uncertainty associated with public hearings would likely significantly discourage ADU construction. In many jurisdictions, public hearings are not required for ADU development. Staff feels that the proposed policy would allow for compatible ADU development without the need for a public hearing process.



# Braddock Metro Citizens' Coalition

---

*Working for a Greater Northwest Old Town.*

[www.braddockmetro.org](http://www.braddockmetro.org) | [bmcc@braddockmetro.org](mailto:bmcc@braddockmetro.org)

January 4, 2021

Chairman Nate Macek  
Members of Planning Commission

RE: Zoning Text Amendment #2020-00007  
Accessory Dwelling Units

Dear Chairman Macek and Members of Planning Commission:

I am writing on behalf of the Braddock Metro Citizens Coalition (BMCC) Board in support of the proposed text amendment to codify Accessory Dwelling Units in the City. I qualify this support by saying that the proposal has been primarily vetted with the BMCC Board, since we have had limited interaction this year due to the on-going COVID-19 restrictions. This is probably true for most civic associations in the City.

That said, we have followed the Planning staff work over most of this year as they developed and refined the various aspects of the proposal. This has not been an easy assignment, but we feel staff has been diligent in researching and benchmarking ADUs in Virginia elsewhere in the country. Staff has conducted many public outreach surveys and virtual meetings despite COVID-19 restrictions. We do not believe these "remote" efforts have meant less public input but may have resulted in more as it is easier for folks to participate from the comfort and safety of their homes.

We understand that there are some concerns about a few aspects of the proposed policy, but we would point out that staff has proposed a thorough review of ADUs at the two-year mark to address any recurring issues and allow for refinement of the policy. Though the proposed policy does a decent job of addressing most aspects of individual sites, this kind of effort cannot fully anticipate how the policy might be implemented under various existing ownership conditions.

We agree in general with most aspects of the proposal, understanding that some of them have presented difficult choices. However, we think the overall benefit to homeowners and the City is clear. This will not solve the problem Alexandria has with a housing supply that is affordable broadly but every small addition to that stock helps someone who would not otherwise have an option to live here. We believe that the policy should be instituted City-wide. There will be homeowners in every neighborhood who will need an independent living space for an elderly parent, a recent college graduate, a divorced daughter with a child, etc. Those just starting their careers, like teachers and first responders, might be able to live in an ADU near where they work rather than commute from outlying areas. Young couples who can rent out an ADU will be better able to qualify for a mortgage in a nice neighborhood. The positive outcomes of this policy will emerge in a few years, just as the challenges will. We should adjust the policy accordingly at that point, but we should move it forward now.



# Braddock Metro Citizens' Coalition

---

*Working for a Greater Northwest Old Town.*

[www.braddockmetro.org](http://www.braddockmetro.org) | [bmcc@braddockmetro.org](mailto:bmcc@braddockmetro.org)

Though challenging, and an undertaking better suited for City Council than the Planning Commission, we suggest that the City consider a real estate tax incentive for homeowners that rent (not short term) their ADUs at a below market-rate. This would broaden the folks that could afford an ADU and push back against investors converting housing stock for profit.

In addition, there have been concerns about some ADUs causing an increase in impervious surfaces in certain areas that are prone to flooding. As those areas are now better understood after this year's flooding, it would be useful if the City provided planning resources to help homeowners ameliorate storm water effects on individual ADU sites in those areas.

We encourage implementation of the proposed ADU policy early in 2021. The need for these kinds of units has only increased with the circumstances of 2020. Waiting any length of time will not resolve many issues which have been raised to date. We ask that you support ADUs in Alexandria and move the policy forward sooner rather than later.

Sincerely,

A handwritten signature in blue ink that reads "Judy Guse-Noritake". The signature is fluid and cursive.

Judy Guse-Noritake, President  
Braddock Metro Citizens Coalition

Cc: Braddock Metro Citizens Coalition Board & Membership  
Karl Moritz, Director, Planning & Zoning

**[EXTERNAL]Support for adoption of City-wide ADU provision**

Jacquelyn Piper <pipervalerie@gmail.com>

Mon 1/4/2021 3:39 PM

To: PlanComm <PlanComm@alexandriava.gov>

Happy New Year!

I am writing to express strong support for the adoption of a city-wide as-of-right allowance for auxiliary dwelling units (ADUs) as a low-impact and expedient way to expand housing supply in the City and promote more affordable options for people working in the area. The proposed provisions include both detached structures and additional units incorporated into the primary dwelling unit structure, which is also appropriate for the City's existing housing stock.

I commend Planning Commission staff and leadership for thoroughly researching how ADUs are being handled nationwide and advancing a workable local solution.

Thank you,

Valerie Piper  
Resident of Old Town

---

**DISCLAIMER: This message was sent from outside the City of Alexandria email system.  
DO NOT CLICK any links or download attachments unless the contents are from a trusted source.**

# City of Alexandria, Virginia

## MEMORANDUM

DATE: JANUARY 5, 2021

TO: CHAIR AND MEMBERS OF THE PLANNING COMMISSION

FROM: KARL W. MORITZ, DIRECTOR, DEPARTMENT OF PLANNING & ZONING

SUBJECT: ACCESSORY DWELLING UNIT (ADU) TEXT AMENDMENT  
CORRECTION

---

This memorandum provides a correction to the proposed Zoning Ordinance text changes. Staff inadvertently omitted the restriction that an accessory dwelling unit must be held in common ownership with the owner of the principal dwelling. This provision would be located within new section 7-203(A) as follows:

### 7-203 – Accessory dwellings.

#### (A) Use Limitations.

- (1) An accessory dwelling shall be permitted as an accessory use to a single-family, two-family or townhouse dwelling only.
- (2) Only one accessory dwelling shall be permitted on any recorded lot including properties subject to section 7-103(D).
- (3) The gross floor area of an accessory dwelling within a principal dwelling shall not exceed one-third of the principal dwelling's gross floor area.
- (4) No more than three persons shall reside in the accessory dwelling.
- (5) **The accessory and principal dwelling shall remain under common ownership.**

Grassroots Alexandria supports the proposed ADU legislation. When considering how to ensure that Alexandria is an affordable and welcoming place for all, we must consider ADUs as a part of that equation. With the decrease in market affordable housing in Alexandria over the past years, a solution like ADUs is needed. ADUs are a necessary element to making housing affordable, increasing creative options for homeowners, adding to housing stock in an expedient way that doesn't require expensive builds or development, and adding options for housing that will enhance the diversity of our neighborhoods. These are all elements that contribute to a growing and thriving Alexandria.

We share concerns regarding the addition of an owner occupancy requirement, which restricts the flexibility and creativity that the ADU legislation could allow. This requirement may inhibit the benefits that the ADU legislation proposes, potentially limiting the possibility of adding-on ADUs to only the affluent and restricting ADUs as an option for those who often need to make flexible housing arrangements, such as military and diplomatic families. We agree with the statements in the staff report and the report from The Urban Institute, citing the owner occupancy requirement as an additional impediment and agree that the concerns that the owner occupancy seeks to address can be mitigated by other city codes.

If there is no option to change the owner occupancy requirement, we would also encourage a report addressing the observed impact of the requirement to see if it indeed adds burden and unnecessarily restricts less affluent homeowners and provides less flexibility to those who need it. At that time, we would encourage City Council to drop the requirement. If that isn't possible, we would urge Council to look into creative ways to ensure that the ADU legislation is actually meeting the goal of expanding housing options in Alexandria, such as waiving requirements for certain populations or providing financing options to increase the population of those who could take advantage of the ADU legislation.

-Rebecca Loesberg

**[EXTERNAL]In support of ADUs**

Josh Snider <josh@joshuasnider.com>

Tue 1/5/2021 9:51 AM

To: Sam Shelby <sam.shelby@alexandriava.gov>; PlanComm <PlanComm@alexandriava.gov>

Hi guys,

I noticed you were taking public comments on an ADU proposal today. I'll try to make the meeting, but in case I don't I just wanted to express my support of any proposal that makes it easier to build housing in the DC area.

Sincerely,  
Josh Snider

---

**DISCLAIMER: This message was sent from outside the City of Alexandria email system.  
DO NOT CLICK any links or download attachments unless the contents are from a trusted source.**



Liveable Alexandria (a new organization advocating for transit and housing in the City of Alexandria) supports the city's proposed accessory dwelling unit (ADU) legislation, which we believe will add to housing supply, help with affordability, provide new options to homeowners, and add to the socioeconomic diversity of our neighborhoods. We are enthusiastic about the features that will help ensure the program is a success and make it easier to build ADU's, such as not requiring off-street parking for the ADU and allowing ADUs citywide.

We are concerned about the owner occupancy requirement. We fear this will make it difficult for many homeowners to finance ADU's and could limit the supply of ADU's. It may be a special burden on less affluent homeowners who have fewer financial resources, and on people who must move on short notice, such as military and diplomatic families, who often choose to rent out their primary residence.

We suggest that if the owner occupancy requirement is retained, that staff report to Council after 3 years, addressing the observed impact of the requirement. At that point the Council should consider such option as providing a financing mechanism for less affluent homeowners, waiving the requirement for military and diplomatic families, or dropping the requirement altogether.

Sincerely,

Ken Notis

**[EXTERNAL]Tonight's commission meeting: Comment on ADUs**

Ed Kemp <edkemp101@gmail.com>

Tue 1/5/2021 10:48 AM

To: PlanComm <PlanComm@alexandriava.gov>

For the Commission:

I am an Alexandria resident (5 W Spring St) and member of Grassroots Alexandria. For the record of tonight's meeting, I am in favor of accessory dwelling units citywide and without owner occupancy. As one of the tools for opening up more opportunities for residents of varying income levels, I believe ADUs add diversity to the housing stock in the city. Please drop the requirement for owner occupancy of the units as this would limit supply to renters. Thank you for your consideration.

Edward Kemp  
5 W Spring St  
Alexandria, VA 22301

---

**DISCLAIMER: This message was sent from outside the City of Alexandria email system.  
DO NOT CLICK any links or download attachments unless the contents are from a trusted source.**

## re: Accessory Dwelling Units in Alexandria

davidhalwig@cs.com <davidhalwig@cs.com>

Tue 1/5/2021 12:16 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Sam Shelby <sam.shelby@alexandriava.gov>

To the City of Alexandria Planning Commission

From: David Halwig

212 East Alexandria Ave

Alexandria, VA 22301

**Subject: Citizen Objection to the Proposed Zoning Text Amendment #2020-00007 Accessory Dwelling Units**

I am a resident homeowner of the New Addition section of Del Ray and am submitting this objection to the proposed zoning text amendment.

The ADU proposal can have a profound negative impact on an individual homeowner with only negligible benefit projected for the community as a whole. It lacks meaningful measures of success. The expectations for actual ADU construction are so modest as to be meaningless in a partial sense.

This is being presented as some sort of value-added feature for the homeowners who do this without acknowledging the impact to those who choose not to. The proximate neighbors can suffer harm from loss of privacy, freedom of use, sense of security, and aesthetic and actual property value and other considerations. Some of its provisions go so squarely against the concept of neighborhood

With its apparent genesis from outside advocacy groups and not through citizen demand, the proposal appears to be almost an act of vanity to for the City to feel compelled to have an ADU program – not a thoughtful act of responsible and accountable governance.

My objection is based principally on the following issues:

**Neighborhood Density:** Parts of Alexandria (particularly Del Ray) are already very high-density and it is not clear that facilitating an increase in that density by this proposal would not diminish the quality of life of the neighborhoods we live in.

**Loss of privacy and quality of life:** To a homeowner proximate to an ADU, the construction of a one or two story structure, setback only a few feet from the property line would intrude on privacy, looming over personal space. Many of us moved to Del Ray because of the ability to have relatively private yards and have invested heavily on establishing and maintaining outdoor spaces for their personal use. Proximate neighbors, particularly those with children, might have safety concerns about ADU residents, particular those of transient occupancy peering in their yards, watching their children and others.

**Transient Housing:** We are a neighborhood, not a motel district. Allowing ADU's as short-term rentals encourages transient populations which may not share the values of the neighborhood and may compromise the community spirit which we have worked so hard to achieve.

**Parking is already very limited.** There is no parking to spare in much of Del Ray. One of our neighbors temporarily housed several individuals in what appeared to be an impromptu ADU. Although it was eventually ceased, each of the people had their own car and with differing work schedules made parking in front of our residences problematic. If someone is adding a resident with one of more vehicles, they should have to accept their obligation to make this parking-neutral to their neighbors – and turning back yards into parking lots is not consistent with the architecture of our area.

**Loss of Intrinsic and Monetary Value:** An ADU building looming on a proximate neighbor's property line would likely diminish the intrinsic and resale value of that property. The adjacent or proximate homeowners would not have any meaningful say on this as they might in normal permitting. (I doubt this would likely be reflected in tax relief by the city).

**Limited enforcement:** There is little in the proposal about enforcement. We already have what we believe to be one or two ADU's in our neighborhood, neither one permitted. When asked, the City indicated that as a practical matter regarding access to private property to verify occupancy, they are very limited in their enforcement ability to and the city believes they cannot enforce the existing code except briefly when the property is advertised for re-rental. There does not appear to be any ongoing requirement for owners of ADU's to report on their

compliance with the provisions or report on how their actions have addressed the underlying initiatives of affordable housing on an on-going basis.

**Proliferation:** There seem to be no meaningful provisions to require covenants in deeds granted ADU permits or other measures to ensure that the conditions of owner-occupancy and the like are conveyed with property parcels. Absent realistic enforcement ability, it will only be a matter of time before ADU properties become dual-residences and our ever-creative corps of entrepreneurial developers begin to exploit the ability to effectively subdivide existing parcels of land.

**No accountability for results:** The proposal appears to be based on various subjective goals of affordable housing, many seeming to come from generic sources like the Urban Institute which may have prevailing interests in propagating ADU programs. In deference to lofty-sounding goals of social impact, the city's own staff estimates of the number of AADU's expected be built is so modest as to be immeasurable. Accordingly, this seems to be a program which has neither provision for objective measures of success nor expectations that, if successful, it would make any real difference to the conditions it seeks to address.

**No Consideration for Disparate Individual Impacts:** Clearly, someone electing to install an ADU stands to gain from its use and/or rental. The City stands to gain from increased tax revenue. Our contractors and various utility companies stand to gain from construction and usage fees. But, just as clearly, the proximate neighbors stand to lose, without recourse, quality of life, privacy, ease of use, and potentially sense of security as well as aesthetic and actual property value.

**Individual Impacts:** The report to the commission states, ""...staff estimates that fewer than 15 ADUs would be created annually in Alexandria. Regardless of how many units are created annually, staff's proposed ADU policy would minimize potential land use impacts and ensure compatibility with existing neighborhoods." It only takes 1 ADU if it is your yard it is looming over. I am not sure if the survey of public opinion would be as favorable if the question was asked about building an ADU overlooking their own yard or with a window 8 feet from your window. Who gets to take one for the team on this?

**Process Bias in the Extreme:** Clearly, the staff put a lot of effort into developing the ADU proposal. However, as I navigated the various information and feedback points in the process, I noted that by all indications, this was not something to be studied as much as justified. When I watched the consultant's video it became quickly apparent that she was an advocate for this and not a neutral advisor. Every reason not to do it was dismissed as being not important, unfair to non-residents, or not likely to happen. It was more indoctrination than information. This kind of bias is reflected in the staff's proposal which seems to be doing all it can to make this happen and without regard to the interests of proximate neighbors. When I attended the information session at the DRCA, several questions which I submitted in the chat room went unaddressed. My email asking for answers was acknowledged with a commitment to respond – and no response has forthcoming. I guess my opinion does not matter much on this. Next time perhaps the City could be more forthright in their intent.



218 North Lee Street, Suite 310  
Alexandria, Virginia 22314  
(703) 549-5811

[www.HistoricAlexandriaFoundation.org](http://www.HistoricAlexandriaFoundation.org)  
[HistoricAlexandriaFoundation@gmail.com](mailto:HistoricAlexandriaFoundation@gmail.com)

January 5, 2021

Chairman Nate Macek  
Members of the Planning Commission  
City of Alexandria

**RE: Accessory Dwelling Units (ADUs) Proposal, Planning Commission Docket Item #6, 1/5/21**

Dear Chairman Macek and Planning Commission Members:

The Historic Alexandria Foundation has reviewed the staff memo and Zoning Text Amendment Proposal #2020-00007 for Accessory Dwelling Units. In furtherance of our mission “to preserve, protect and restore structures and sites of historic or architectural interest in and associated with the City of Alexandria” we are submitting comments relating to the Old and Historic Alexandria District, the Parker-Gray District and the listed 100-year-old buildings.

Our basic question, which, unfortunately, we were unable to get answered by an email to the staff, is **assurance that the Board of Architectural Review will still review any new construction in the two historic districts, as well as on listed 100-year-old buildings properties.**

The staff memo addresses properties in the Old and Historic Alexandria District (OHAD) and the Parker-Gray (PG) District on page 12 under topic #5 ADUs and Floor Area Ratio (FAR), stating:

*“The Zoning Ordinance currently exempts detached garages and sheds from Floor Area Ratio calculations. Under current regulations, the following can be excluded from floor area:  
.... For townhouse dwellings and all dwellings within the City’s OHAD/PG districts, the floor area of a 65-foot square shed may be excluded.”*

**Shouldn’t this exclusion also apply to listed 100-year-old buildings?**

Further down on page 12, staff recommends that floor area exclusions apply to detached ADUs, as follows:

*“For Townhouses and all dwellings within the City’s OHAD/PG districts:*

- *65 square feet for all lot sizes”*

**Again, shouldn’t this exclusion also apply to listed 100-year-old buildings?**

On page 14, #8 Special Exception for Detached ADU's, the memo states:

*"Staff proposes a special exception process for ADUs. This process would allow the Board of Zoning Appeals (BZA) to grant permission for a property owner to use an existing detached accessory building that does not comply with the proposed bulk and setback requirements to be used as an ADU. For example, an existing detached accessory building that exceeds staff's proposed height or size requirements, could, with BZA approval, be converted to an ADU."*

**This proposal should exclude properties in the OHAD and PG districts, as well as listed 100-year-old buildings from the special exception process. The BAR should have purview over height or size requirements.**

On page 15 Other Considerations, the staff memo states:

*"ADUs would also be subject to other requirements both imposed by the Zoning Ordinance, development approvals, and private covenants, as outlined below:*

- *Any new construction to accommodate an ADU that would be visible from a public-right-of-way within the City's Old and Historic Alexandria and Parker-Gray Districts would require approval from the Board of Architectural Review."*

**Shouldn't this also apply to listed 100-year-old buildings?**

Turning to the zoning proposal, (Attachment #4) on page 53, Article II – Definitions, Section 2-145 defines Floor area.

Section 2-145(A) states:

*For residential dwellings in the R-20, R-12, R-8, R-5, R-2-5, and single-family and two-family dwellings in the RA and RB zones (not including property located within the Old and Historic Alexandria and Parker-Gray Districts), the floor area of the building or buildings on a lot or tract or tract of land (whether 'main' or 'accessory' is the sum of all gross horizontal areas under roof on a lot.....*

**We believe that most residential properties in the two historic districts do not fall within these zones, and that the R-M zone may be the most common in the two districts. So, to clarify, it appears that staff is trying to exclude all residential dwellings in the O&HA and PG Districts from this floor area requirement. We don't know if that is good or bad, but ask whether the R-M zone (at least) should be included in that list?**

Next, the Old and Historic Alexandria and Parker-Gray Districts are referred to in Article VII.

Supplemental Zone Regulations.

Section 7-203, Accessory Dwellings:

*(B) Bulk and Setback Requirements for a detached accessory building:*

*(3) Side and rear yards. The accessory building shall be permitted in required side and rear yards subject to the following requirement:*

*....*

*(d) Outside of the Old and Historic Alexandria and Parker-Gray Districts, if a wall of a dwelling on an adjacent lot has any windows or doorways that have a sill lower than 20 feet, measured from grade, facing the shared lot line and located within three feet of that shared lot line, the setback shall be five feet, including any roof overhang, from that shared lot line....*

**It is really unclear what this provision is meant to do, but if it is intended that the BAR has jurisdiction over this question in the two districts, should they also have jurisdiction over this question for listed 100-year-old buildings?**

Turning to page 58 of the staff report, the proposal shifts into Article 11 - Development Approvals and Procedures (without showing that title). The text should read:

“Article 11 – Development Approvals and Procedures

11-1301 – Authority. The Board of Zoning Appeals is authorized to review applications for those Special Exceptions established by this Section – 11-1300.”

**Should a provision be added to Section 11-1302 – Special exception established, to exempt properties in the two historic districts and 100-year-old buildings from this provision, or to clarify what the BAR will have jurisdiction over?**

**Suggested wording:**

***A lot developed with a single family, two family, or townhouse dwelling (except in the Old and Historic Alexandria and Parker-Gray Districts, and listed 100-year-old buildings) may be the subject of a special exception from the following zoning requirements pursuant to this section 11-1300....***

Finally, the earlier staff draft (10/9/20) states that Recommendation #3 is to require an Administrative Permit for ADUs from the Department of Planning and Zoning. **Should the Permits section of the Ordinance be amended to clarify this, and more specifically, to state that ADUs in the Old and Historic Alexandria and Parker-Gray Districts, and listed 100-year-old buildings, will be reviewed by the Board of Architectural Review?**

Having concluded the questions that the Historic Alexandria Foundation has, I now turn to the excellent memos provided by civic associations. It is clear that much more work is needed before this proposal is ready for your approval, and I hope you will defer action on it, until these many concerns are addressed.

Sincerely,

A handwritten signature in black ink that reads "Gail C Rothrock". The signature is written in a cursive, flowing style.

Gail C. Rothrock  
Board and Advocacy Committee Member  
Historic Alexandria Foundation

**[EXTERNAL]Support Accessory Dwelling Zoning Text Amendment #2020-00007**

Joshua Veverka &lt;jveverka@NVAR.com&gt;

Tue 1/5/2021 1:43 PM

**To:** PlanComm <PlanComm@alexandriava.gov> 1 attachments (148 KB)

NVAR Supports Alexandria Accessory Dwelling Ordinance.docx;

The Honorable Nathan Macek, Chair  
City of Alexandria Planning Commission  
301 King St., Room 2400  
Alexandria, VA 22314

Dear Mr. Macek,

On behalf of the Northern Virginia Association of REALTORS® (NVAR) and its 13,000 members we are writing you to support Zoning Text Amendment #2020-00007 which expands opportunities for homeowners to build and utilize accessory dwelling units while effectively maintaining the established character of the City's neighborhoods.

Increasing the supply of affordable housing is a challenge for localities across Northern Virginia and throughout the region. Accessory dwellings have the potential to incrementally increase the supply of affordable housing by leveraging the existing housing stock on already developed land. They also disperse affordable housing across neighborhoods rather than concentrate it in a few areas.

According to the National Association of Realtors®, the market for the affordable housing provided by accessory dwellings is large and diverse. The American household is no longer defined solely by the model of two parents living with children. Today, the average American household consists of only 2.6 people. Many find that they no longer need or want the space of a traditional single-family home. Accessory dwellings are also useful for families who want to help other family members live nearby, but who want them to have a separate residence. A homeowner may want to furnish a living space for his or her parents or may want to make sure a child who has just started to work and be independent has a decent place to live while still not living "at home."

This ordinance is well crafted to accommodate both the rights of property owners who wish to add an accessory dwelling and provides adequate size and occupancy limits to address the concerns of their neighbors worried about increased population impacting the neighborhood.

Thank you for your consideration.

Sincerely,



Derrick Swaak  
President

**Josh Veverka | Government Affairs Director**

**Northern Virginia Association of Realtors®**  
8407 Pennell Street, Fairfax, VA 22031  
703.207.3201



January 4, 2021

The Honorable Nathan Macek, Chair  
City of Alexandria Planning Commission  
301 King St., Room 2400  
Alexandria, VA 22314

Dear Mr. Macek,

On behalf of the Northern Virginia Association of REALTORS® (NVAR) and its 13,000 members we are writing you to support Zoning Text Amendment #2020-00007 which expands opportunities for homeowners to build and utilize accessory dwelling units while effectively maintaining the established character of the City's neighborhoods.

Increasing the supply of affordable housing is a challenge for localities across Northern Virginia and throughout the region. Accessory dwellings have the potential to incrementally increase the supply of affordable housing by leveraging the existing housing stock on already developed land. They also disperse affordable housing across neighborhoods rather than concentrate it in a few areas.

According to the National Association of Realtors®, the market for the affordable housing provided by accessory dwellings is large and diverse. The American household is no longer defined solely by the model of two parents living with children. Today, the average American household consists of only 2.6 people. Many find that they no longer need or want the space of a traditional single-family home. Accessory dwellings are also useful for families who want to help other family members live nearby, but who want them to have a separate residence. A homeowner may want to furnish a living space for his or her parents or may want to make sure a child who has just started to work and be independent has a decent place to live while still not living "at home."

This ordinance is well crafted to accommodate both the rights of property owners who wish to add an accessory dwelling and provides adequate size and occupancy limits to address the concerns of their neighbors worried about increased population impacting the neighborhood.

Thank you for your consideration.

Sincerely,



Derrick Swaak  
President



Affiliated with the  
National Association  
of REALTORS®

Fairfax Headquarters  
8407 Pennell Street  
Fairfax, VA 22031  
703.207.3200

Herndon Center  
520 Huntmar Park Drive  
Herndon, VA 20170  
703.207.3213

Department Phones  
Membership 703.207.3256  
Education 703.207.3244  
Realtor® Shop 703.207.3215

Social Media  
"Like" Us on Facebook: NVAR  
Twitter: @NVAR  
LinkedIn: NVAR

January 5, 2021

Planning Commission  
City of Alexandria  
301 King Street  
Alexandria, VA 22314

***RE: Support for Accessory Dwelling Units in Alexandria***

Dear Planning Commissioners:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG), the leading organization in the DC region advocating for walkable, inclusive, transit-oriented communities. CSG appreciates the City of Alexandria's efforts to develop an accessory dwelling unit (ADU) policy and writes to convey our full support of the proposal. CSG has become a leading expert on ADUs through our work in DC and our just-released [DC ADU homeowners manual](#).

Accessory dwelling units can offer less expensive housing options than renting or buying a single-family home because of their smaller size. They are great for an aging parent you are caring for, offer a home for your recent college graduate, or a young professional just starting their career. ADUs can also offer a stream of income for homeowners, including lower-income homeowners and retirees on fixed incomes.

CSG is enthusiastic about the strong provisions being proposed that will help make the City's program a success, such as allowing ADUs citywide, not requiring off-street parking requirements for the ADU in our transit-rich city, and the no-fee application process.

We are concerned however about any owner-occupancy requirement. This requirement lacks flexibility for the homeowner and may limit one's ability to build an ADU. An owner-occupancy requirement could make it difficult for homeowners to finance accessory dwelling units. This may serve to exacerbate income and racial inequities by limiting the ability of homeowners to construct ADUs to those with sufficient equity in their homes.

An owner-occupancy requirement would also be limiting to people who must move on short notice, such as military and diplomatic families, who often choose to rent out their primary residence. We also note that single-family homes today are already frequently rented out by

owners who are not living on site. The owner-occupancy requirement would be a barrier to constructing ADUs and undermine the goal of increasing the supply of ADUs in the city.

We encourage the city to establish a timeframe of a few years and require that staff review the new policy and make recommendations to address impacts to the success of the program. This could include creating an affordability program for low-income renters or buyers, assessing size limitations and setbacks and their impact, whether or not the program has exacerbated or improved racial and income inequalities, and recommendations to address any other barriers towards creating new housing through ADUs.

While future tweaks to the program may be necessary, CSG believes the proposed ADU policy is a bold step forward in establishing a strong program that will help provide more housing options in Alexandria. Thank you for your time and consideration.

Sincerely,

Sonya Breehey  
Northern Virginia Advocacy Manager  
Coalition for Smarter Growth

**To: Alexandria Planning Commission**

**From: Owen P. Curtis, 5465 Fillmore Ave., Alexandria, VA 22311**

**Date: January 5, 2021**

I have a number of concerns about ADUs, and I urge the Planning Commission to set this idea aside for additional study, OR, reject it outright as ill-conceived and a threat to our quality of life.

- 1) There is not demonstrable evidence provided that they will provide an affordable housing option in the single family residential areas of the City. Arlington has permitted them for a number of years, few have been implemented, and Arlington has not seen any positive impact on affordable housing due to the ADUs. There is no reason to believe Alexandria would be any different.
- 2) They are an inherent addition of density of development, which comes with adverse environmental issues (impervious surface, loss of tree canopy) and more traffic and parking.
- 3) The proposed regulations are poorly conceived:
  - a. Off-street parking **MUST** be provided in order to preserve safety and capacity of local streets for ALL users.
  - b. The one-foot setback is a joke. The City requires a lot more than that for sheds! It steals light and air from the neighbors, and is invasive to privacy, and a likely source of unwanted noise.
  - c. The maximum size is far too large on properties where there is a large home. Some maximum square footage must be set to keep this under control.
- 4) Perhaps the most serious item is that they can be used as short-term rentals, aka, Air BnBs. Please say “no!” to this stupid idea. It adds **NOTHING** to the supply of affordable housing. It creates a for-profit “motel” in a residential neighborhood. We have some today in Seminary West, all with absentee landlords, which are used by construction workers, with all their trucks. The landlords do not care about our neighborhood; they are running a business. ADUs should be prohibited from being temporary lodging.
- 5) In the Seminary West neighborhood, we have what are effectively ADUs -- single family homes operated as multi-adult, non-related residences, essentially boarding houses. They have no landlord on premises. Virtually every neighborhood noise, traffic, crime, etc. issue over the past 42 years in our neighborhood has been related to such multi-adult rental properties. It eludes me how ADUs will be any different than these. They are attempts to lower rental costs, but they end up with poor maintenance, cars parked all over, and too many problems. Over the county line in Fairfax, where they are not as effective

as the City is on code enforcement, you will see single family homes with 9 - 12 cars parked in the drive and all over the lawn. I suspect the addition of ADUs in the City will send us towards that model, which is not one anyone concerned about property values wants to see.

- 6) ADUs, though, may have a place in the City. I can see them in newly developed areas where they are part of the neighborhood fabric from Day 1. I can also see ADUs working if they are restricted to multi-generational family use only, though I cannot see how that can work once the elders pass on. Adding ADUs, though, to a single-family neighborhood can radically change it, and its property values. If that idea advances, there should be a referendum in the neighborhood that approves the idea before ADUs can be implemented.
- 7) The wisest thing to do is to work with the citizens, identify one neighborhood as a test case, to permit ADUs under tight restrictions (owner must live on site, no AirBnBs, off-street parking required, etc.). Let that run 3 – 5 years, and see how much they have added to affordability of housing in the City. If they work, then go ahead. If not, we can keep it the same as it is today, which is you CAN get a permit for one, if you follow a lot of sound requirements.

Bottom line: Please reject the notion of ADUs as a by-right form of development in single-family zoned areas.

Owen P. Curtis

opctiger72@aol.com

Dear Planning Commission,

While I understand the need for affordable housing, and age-in-place options for Alexandria residents, I am opposed to the proposed Accessory Dwelling Unit text amendment for the following reasons:

1. ADUs will increase density in a City that already has the highest density in the area.

According to the Northern Virginia Regional Commission, Alexandria is the most densely populated city in Virginia with 7,281 persons per square mile. Adding additional accessory units will add to the density.

2. ADUs will have a negative impact to immediate neighbors in areas with small lots.

Throughout the Zoning Ordinance, there is language pertaining to the impact of buildings on “light and air”. The proposed ADU language does not seem to consider this. The staff report states “accessory uses should “blend in” with the primary uses to which they are incidental. Ensuring that ADUs remain as accessory uses, by limiting their impact on the physical and infrastructure needs of the neighborhoods in which they are created, is the most important aspect of ADU policy...These regulations exist to ensure that detached ADUs are not inappropriately large or placed inordinately close to a property’s lot lines.” However, the report recommends a 1-foot side yard setback or three feet if an ADU has windows, and a maximum height of 20 feet. How is one foot not inordinately close to a lot line? How does a property owner maintain the exterior of the structure without guaranteed access from the adjacent neighbor?

The setback requirements may have a minimal impact in neighborhoods with larger lots. However, for areas with smaller lots such as Old Town, Rosemont, and Del Ray, an ADU could have a significant negative impact to light, air, and value of adjacent properties. By right, I could construct a 500 square foot ADU behind my end unit townhouse. If the ADU was 23 feet long and 20 feet high, it would block a significant portion of my neighbor’s 18 foot wide yard and would impact the light and air. I could use the most inexpensive construction materials with no regard to the impact of my neighbor’s view of the structure above the 42 inch picket fence.

ADUs with no additional off street parking will have an impact to neighborhoods where there is a high demand for on-street parking. The report states, “Staff recommends that no additional off-street parking spaces be required for ADUs and that no required parking shall be removed to accommodate construction of an ADU. Staff found that requiring the construction of additional driveways to accommodate off-street parking could result in the appearance of very large driveways.” On properties that have alley access, one parking space could be added for the ADU with a limited impact on the appearance of a large driveway. Arlington County requires ADUs to have off street parking in areas where there is high parking demand. If Alexandria adopts the ADU language, it should also require off street parking where there is high demand for on-street parking.

3. ADUs will present additional strain on an already strained infrastructure.

In my neighborhood, we have severe flooding during significant rainfall. Creating more opportunities for impermeable surface will only exacerbate the problem. One of my neighbors has had to replace a hot water heater twice in less than a year due to basement flooding. Several of my neighbors and I have had sewage backups in our basements. I have attached photos of the issue. The photo of my neighbor on a Stand Up Paddleboard cruising down Wayne Avenue says it all. How will the City manage potential additional flooding if ADUs are introduced in flood-prone areas?



Has the city considered the impact of sewage runoff into the river? Will adding additional residences contribute to the problem? I read somewhere that Alexandria unintentionally dumps sewage into the Potomac approximately 70 times a year.

4. There is no language that encourages or guarantees that ADUs will be affordable.

The proposed ADU language is missing criteria to ensure that the additional units will be affordable. If the intent of permitting ADUs is to ensure housing affordability, then language should be added to ensure it.

The staff report indicates that “research has shown that these units are often rented below market rate due to their relatively small size compared to larger apartments, lack of amenities, and propensity to house family members or caregivers (sometimes, rent-free).” Why were the details of that research excluded from the staff report? Quantitative evidence of affordability would

help to support the argument that ADUs will be affordable. The absence of it makes me highly skeptical. There is currently an unofficial ADU in my neighborhood. The ADU occupies the second story of the garage. It is 635 square feet and rents for \$2100 per month. A few blocks away and closer to the metro, there are larger garden style 1 bedroom apartments that rent for \$1300 a month.

5. There is no evidence that ADUs will have a significant impact on housing availability and equitable access.

The staff report indicates that the language ensures “new development within an increasingly urban environment can occur to respect and consider existing infrastructure resources and complement the fabric of neighborhoods while creating new, more affordable and equitable access to housing options in areas of opportunity throughout the City.” However, there is nothing in the language that addresses how the city will ensure equitable access to housing options.

The staff report indicates the purpose of ADUs is to increase the stock of affordable housing, and increase housing availability in general. The report indicates that the city has lost 16,000 market affordable units over the past 20 years. The report states that “Even in jurisdictions with very permissive policies, ADUs only account for around one percent of the total housing stock, as shown in Table 1.” The report also says that Arlington County has 45 ADUs constructed over the past 11 years. If the construction of ADUs in Alexandria happens at the same rate, 45 ADUs won’t make a dent in the 16,000 lost market affordable units.

If the intent of allowing ADUs was for sole purpose of allowing people with the financial means to construct an ADU to age in place, or provide a place to live for a family member, then the ordinance will serve its purpose. I would be more in support of the ADU language if it included language to ensure ADUs were rented at affordable rates, considered the impact on adjacent neighbors and excluded areas that are already very densely populated such as Old Town, Rosemont and Del Ray.

At the 2020 Alexandria Housing Summit, Matt Pastore, an Urban planner provided a presentation on ADUs. He stated that ADUs work best in neighborhoods with single family houses. Perhaps the city should consider allowing ADUs in parts of the city with larger lots occupied by single family homes. Once the ADU text has been in the zoning ordinance for a few years, the city could assess the impact of the ADUs and determine if it should expand the by-right use to smaller properties.

Thank you,

Sarah Haut