Isaac Gloor

The addition of language specifically stating that accessory dwelling units are not exempt from the requirement to obtain an SSDP would increase the already startling inequity in shoreline uses. Shoreline regulations that exempt single-family homes from onerous process requirements acknowledge an obvious fact: compliance with the SMA's permitting mandates are challenging and expensive, and can be prohibitively difficult for first-time or amateur applicants. However, instead of creating equity in requirements, the regulations heavily favor low-density, high-cost development along the State's most valuable real-estate by easing pathways for single-family homes and erecting barriers for all other kinds of developments. The end result of these rules is a state where, except for small public areas, many of the State's heavily regulated shorelines are exclusive havens of the wealthy. The shores of Lake Washington, Lake Sammamish, and the Puget Sound are increasingly occupied by homes affordable only to the richest Washingtonians.

Of course, this is not entirely due to SSDP requirements. Shoreline land can inherently be more valuable than similar non-shoreline land. However, the State's explicit favor of single-family homes increases the cost of that land per unit. Take an example property, in Seattle along Lake Washington. The 60,000 square foot parcel is typical of those occupied by single-family homes on the lake, with a land value of $15.9 million. The 6,200 square foot home, built in 1932, has a value of about $3 million. Under the rules promulgated by the Department of Ecology, the existing home could be demolished and replaced by a new, even larger single-family home, without the need for an SSDP. The most extravagant home imaginable, with any number of bedrooms or staff quarters or kitchens or amenities, could be constructed without the need for any specific environmental permit at all, save for a Shoreline Exemption report.

Meanwhile, the addition of a single ADU, which would invariably be smaller than 1,500 square feet, would not be subject to the same exemption. A townhouse project, regardless of its size or footprint, would be ineligible. Any form of residential development that proposes a more efficient use of the developable land within the shoreline jurisdiction than that offered by a single-family home mandates complex environmental permits, regardless of that development's actual impact on the shoreline environment.

Please consider amendments to the rules that treat residential development more equitably and consider the actual environmental impact of new development. Some examples of what could look like are: maximum floor areas established for new shoreline residential uses to be exempt, regardless of the number of units; exemptions expanded to include all residential development; or even the exemption for residential development being eliminated. The rules, as they stand, provide benefits only to the State's wealthiest residents, and help ensure that land along the State's most treasured assets, our waterways, continue to be the exclusive domain of the rich.