

# Appendix A: Notices

---



Oct 02, 2017

Seattle Department of Construction and Inspections

## Land Use Information Bulletin

A Twice-Weekly Bulletin Announcing Land Use Applications, Decisions, Hearings, and Appeals  
[www.seattle.gov/dpd](http://www.seattle.gov/dpd)

---

### CITY OF SEATTLE - DETERMINATION OF SIGNIFICANCE (DS) AND REQUEST FOR COMMENTS ON SCOPE OF EIS

Area: Address:

Project: Zone: Notice Date: 10/02/2017

#### **Project Name: Accessory Dwelling Units Environmental Impact Statement**

**Proponent:** City of Seattle

**Lead Agency:** Seattle City Council

**Project Location:** City of Seattle

**Description of the Proposal:** The City of Seattle is proposing to change regulations in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADUs) in single-family zones. ADUs include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs). The proposal involves allowing two ADUs on one lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of detached ADUs.

ADUs have been allowed citywide as part of a single-family house or in the backyard of a single-family-zoned lot since 1994 and 2010, respectively. The City's action would modify the rules that regulate when and where a property owner can create an ADU. The objective of this action is to remove regulatory barriers to ADU production, increase the number of ADUs constructed in Seattle, and allow flexibility for larger ADUs that could accommodate changing household needs and families with children. These policy changes would affect development in Seattle's single-family zones.

**Environmental Determination:** In May 2016, the City prepared an environmental checklist evaluating the potential environmental impacts of the proposed changes to the land use code. The environmental determination of non-significance in the checklist was appealed in June 2016. In December 2016, the Seattle Hearing Examiner determined that a more thorough review of the potential environmental impacts of the proposal was required (<https://web6.seattle.gov/Examiner/case/W-16-004>). Based on the Hearing Examiner's decision, the Seattle City Council, as the SEPA lead agency, has determined that this proposal may have significant adverse environmental impacts on the environment. An EIS is required under RCW 43.21C.030 (2)(c) and will be prepared. The EIS will address probable significant adverse environmental impacts of the proposed changes to the Land Use Code.

**Elements of the Environment:** WAC 197-11 establishes that EISs shall provide a level of detail commensurate with the importance of the impact. The lead agency has *preliminarily* identified the following elements of the environment for analysis in the EIS:

- Land Use
- Aesthetics
- Transportation, including parking
- Housing and Socioeconomics
- Public Services and Utilities

**Alternatives:** The lead agency has *preliminarily* identified the following alternatives for analysis in the EIS. Table 1 compares these alternatives.

- **Alternative 1 – No Action.** Under Alternative 1, the EIS will analyze the impacts of development under existing ADU regulations. Attached ADUs (AADUs) are currently allowed inside or attached to the main house on all lots in single-family zones. Detached ADUs (DADUs) are currently allowed in all single-family zones subject to certain criteria, including a minimum lot size and maximum coverage limits. When a property owner creates an AADU or a DADU, the owner must also have an off-street parking space and must reside on the property. Up to eight unrelated people can live on a single-family lot, including the occupants of an AADU or DADU. Both AADUs and DADUs can be used as short- or long-term rentals.
- **Alternative 2 – Removing Barriers to ADU Development.** Under Alternative 2, the EIS will analyze the proposed Land Use Code changes under consideration to achieve the objective of removing barriers to the creation of ADUs in single-family zones. Under Alternative 2, a lot could have an AADU and a DADU; no parking would be required; there would be more flexibility for the size, design, and siting of DADUs; and the property owner would not have to live on the property. The current household size limit of eight unrelated people would apply unless a lot has an AADU and a DADU, in which case the limit would be 12. No change is proposed to current City policy allowing AADUs and DADUs to be used as rentals.

**Table 1. Existing and Proposed Land Use Code Regulations for ADUs**

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2</b>
<b>1</b> Number of ADUs allowed on a single-family lot	A single-family lot can have one AADU or one DADU, but not both.	A single-family lot can have an AADU and a DADU.
<b>2</b> Parking	One off-street parking space required for an AADU or DADU unless the lot is in an urban village.	No off-street parking required.
<b>3</b> Owner-occupancy	An owner must occupy either the main house or the AADU/DADU for six months of the year.	No requirement for an owner to occupy the house, AADU, or DADU.
<b>4</b> Minimum lot size for DADUs	4,000 square feet	3,200 square feet
<b>5</b> Maximum square footage	<b>AADU</b> 1,000 square feet, including garage and storage areas  <b>DADU</b> 800 square feet including garage and storage areas	<b>AADU</b> 1,000 square feet, excluding garage and storage areas  <b>DADU</b> 1,000 square feet, excluding garage and storage areas
<b>6</b> Maximum height	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Height limits are 1-3 feet higher than existing limits, depending on lot width.
<b>7</b> Lot Coverage Limit	35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.	

<b>8</b>	Rear yard coverage limit	40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.
<b>9</b>	Location of entries	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.	DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).
<b>10</b>	Roof features	No exceptions for roof features on accessory structures are allowed.	Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.
<b>11</b>	Household Size	Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.	Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.
<b>12</b>	MHA Requirements	Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.	
<b>13</b>	Rental Registration and Inspection Ordinance (RRIO)	Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.	

**Scoping:** Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS within the 30-day comment period beginning on October 2, 2017, and closing on November 1, 2017. All comments are welcome, but comments in the following areas are particularly valuable:

- Reasonable range of alternatives
- Potentially affected resources and extent of analysis for those resources
- Measures to avoid, minimize, or mitigate effects of the proposed land use code changes

All comments are due by 5:00 p.m., November 1, 2017, and may be submitted:

- Online at: [seattle.gov/council/adu-eis](http://seattle.gov/council/adu-eis)
- Via e-mail to: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- In writing to: Aly Pennucci, City Council Central Staff, PO Box 34025 Seattle, WA 98124-4025
- In person at the EIS Public Scoping Meetings/Open Houses:

Meeting	October 17, 2017, 6:00-7:30 p.m.	October 26, 2017, 6:00-7:30 p.m.
Locations:	High Point Community Center 6920 34th Ave SW Seattle, WA 98126	Hale’s Ales (in the Palladium) 4301 Leary Way NW Seattle, WA 98107

These meetings will provide an opportunity to learn more about the proposed land use code changes and provide input on the environmental review process.

Date: October 2, 2017      SEPA Responsible Official:           on file            
Ketil Freeman, AICP  
City Council Central Staff

---





Nov 06, 2017

Seattle Department of Construction and Inspections

## Land Use Information Bulletin

A Twice-Weekly Bulletin Announcing Land Use Applications, Decisions, Hearings, and Appeals  
[www.seattle.gov/dpd](http://www.seattle.gov/dpd)

---

### SCOPING COMMENT PERIOD EXTENDED FOR ADU/BACKYARD COTTAGE ENVIRONMENTAL IMPACT STATEMENT

Area: Address:

Project: Zone: Notice Date: 11/06/2017

On October 2, we began the environmental review process to [study](#) the effects of removing barriers to creating accessory dwelling units (ADUs), often called in-law units and backyard cottages, in single-family zones. The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of our analysis. Thank you to everyone who has submitted comments with suggestions for what we should consider in our study.

We know there's a lot of interest in this topic, and we want to make sure we're hearing from everyone who would like to participate. To give people more time to submit comments on our [alternatives](#) and [proposed scope](#), **we are extending the scoping comment period 15 days to November 16.** We have also published the [comments](#) received as of October 30th through the online comment form, by email, and at the two scoping meetings. (We are still reviewing comments and may not have posted every comment received to date; we will post all submitted comments with the final scoping report.)

#### What are we proposing?

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The objectives of our proposal are to:

- make it easier for property owners to permit and build ADUs and backyard cottages
- increase the number and variety of housing choices available in single-family zones
- encourage creation of small-scale, family-friendly homes affordable to a range of households

The proposal we're studying involves allowing both an attached and detached ADU on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, this EIS will review the potential environmental impacts of the proposal.

#### What is scoping?

Before we begin the environmental analysis, the scoping phase is a chance to hear your ideas for the alternatives and types of impacts we should focus on. Scoping is not when we consider *whether* to implement certain policy changes — that occurs after we've completed the EIS process, and you'll have opportunities to weigh in on the proposal then.

You can send us a scoping comment in several ways:

- use our [online comment form](#)
- email us at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- write to Aly Pennucci, City Council Central Staff, PO Box 34025, Seattle, WA 98124-4025

For more information about the ADUs, backyard cottages, and the EIS process, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

---

## City of Seattle

### Other Land Use Notice

#### SCOPING COMMENT PERIOD EXTENDED FOR ADU/BACKYARD COTTAGE ENVIRONMENTAL IMPACT STATEMENT

On October 2, we began the environmental review process to study the effects of removing barriers to creating accessory dwelling units (ADUs) often called in-law units and backyard cottages, in single-family zones. The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of our analysis. Thank you to everyone who has submitted comments with suggestions for what we should consider in our study.

We know there's a lot of interest in this topic, and we want to make sure we're hearing from everyone who would like to participate. To give people more time to submit comments on our [alternatives and proposed action](#), we are extending the scoping comment period 15 days to November 16. We have also published the [comments](#) received as of October 20th through the online comment form, by email, and at the two scoping meetings. (We are still reviewing comments and may not have posted every comment received to date; we will post all submitted comments with the final scoping report.)

#### What are we proposing?

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The objectives of our proposal are to:

- make it easier for property owners to permit and build ADUs and backyard cottages
- increase the number and variety of housing choices available in single-family zones
- encourage creation of small-scale, family-friendly homes affordable to a range of households

The proposal we're studying involves allowing both an attached and detached ADU on the same lot, removing the existing off-street parking and owner occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examines in December 2016, this EIS will review the potential environmental impacts of the proposal.

#### What is scoping?

Before we begin the environmental analysis, the scoping phase is a chance to hear your ideas for the alternatives and types of impacts we should focus on. Scoping is not when we consider *whether* to implement certain policy changes — that occurs after we've completed the EIS process, and you'll have opportunities to weigh in on the proposal then.

You can send us a scoping comment in several ways:

- use our [online comment form](#)
- email us at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- write to My Penneer, City Council Central Staff, P.O. Box 31025, Seattle, WA 98124-1025

For more information about the ADUs, backyard cottages, and the EIS process, visit [seattle.gov/council/2016/EIS](http://seattle.gov/council/2016/EIS).

Date of publication in the Seattle Daily Journal of Commerce, November 6, 2017.  
**1161355-560**

# **Appendix B: Online Comment Form**

---

## **Submissions**

---

## Judith Adams

10/2/2017 10:55

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Discuss these ideas of development and then stop. For the love of god just stop developing every single square inch of this once great city. Anyone living here now will tell you we are sick to death of the construction, the lack of parking provided by these developments, the stress it puts on the infrastructure. The roads cannot take any more traffic. Garbage collectors and emergency vehicles can't get thru our neighborhood now because of the congestion. Stop. Take a breather. Wait for mass transit to catch up. Stop thinking that if you don't provide parking then the occupants will use transit or their legs. They don't! They just park wherever they can find, usually in front of someone's house down the street from where they live. Stop the madness! I think these studies only include the area directly in front of the development. The horror stretches for miles around and onto the roads everywhere. Just STOP!

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Richard Fuhr

10/2/2017 12:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Currently, in neighborhoods zoned as single-family, such as my own, the number of cars is already such that parking is at a premium, and there is already a chronic problem of driveways being blocked. Increasing the housing density would exacerbate an already serious problem. I am opposed to this proposal.

### **Do you have other comments or suggestions related to the scope of the EIS?**

In addition to exacerbating parking problems, the side streets in much of Seattle, including my own, are so narrow, especially with cars parked wall-to-wall on both sides of the streets, that gridlock often develops, with cars unable to pass by each other. Increasing the housing density would exacerbate an already serious problem. Our public transit infrastructure is such that many people do not take buses, and insist on driving their own cars.

## Curtis LaPierre

10/2/2017 13:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Make the EIS as concise and efficient as possible. Many of us are waiting to submit plans based on the code revisions.

## carol sterling

10/2/2017 13:44

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No, let's get on with it. This is costing people homes--affordable homes at that.

**Do you have other comments or suggestions related to the scope of the EIS?**

As above. This is taking a ridiculous amount of time for a few simple enhancements to the rules for creating more housing that benefits owners and potential tenants.

**Matt Gangemi**

10/2/2017 14:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The environmental impact on forests, farms, and fields in Washington state of not allowing more ADUs. Please include infrastructure required to serve this sprawl, along with traffic impacts, roadway construction costs, economic costs to Seattle businesses from reduced availability of labor, and additional greenhouse gas emissions.

**Do you have other comments or suggestions related to the scope of the EIS?**

Just that it's unfortunate that our system only works in one direction. If someone can sue to slow down allowing ADUs, why can't I sue to speed them up?

**anonymous**

10/2/2017 15:08

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Being a long-time resident of a very pleasant neighborhood, I can scarcely imagine a more disturbing and inappropriate use of a persons property. I am oprn-minded enough to be interested in seeing the plans that Councilman O'Brien or other members may have for ADUs or DADUs being built on their property.

**Gus Catalano**

10/2/2017 16:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Sideyard requirements be more relaxed, specially if neighboring properties are not obeying them. 1-2ft setback instead of 5ft. Rear-yard requirement be more relaxed so that I can have a garage for offstreet parking and the DADU unit on top.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Amanda**

10/2/2017 16:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Consider reducing the square footage in Alternative 2 to 3,000 sqft. Many SFH lots in urban villages are small; but could accommodate small ADUs if allowed--either within the home or elsewhere on the property. For example, we

share a parking lot and garage with our neighbors. The both sides of the garage are unusable for modern cars so it serves as storage and bike parking. Both of our lots are slightly smaller than 3,200 sqft so we're unable to make it a more usable space. If regulations allowed, we might be able to build a nice ADU between our two properties.

## Mike Caughey

10/2/2017 16:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

MHA should be applicable to non-owner occupied developments. The proposed changes would allow for investor owned triplex developments in the current SFR zoned areas. Developers who leverage the changes to build rental complexes should be treated on a level basis with those who use the MHA zoning increases. If not treated on the same level the changes will encourage construction of SFR triplexes in avoidance of MHA qualified projects. Similarly the removal of parking requirements in SFR zones outside of the urban villages may create incentives for development of investor owned triplexes in neighborhoods where nearby multifamily properties are still subject to parking requirements. The SFR zoned areas should not be subject to more relaxed standards than adjacent multifamily areas as this may discourage more efficient development of larger projects within the existing multi-family zoned areas.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Rules regarding removal of parking and occupancy requirements should be considered on individualized basis for different parts of the City. The impacts of the proposed changes on areas within urban village boundaries may be materially different than the impacts on other areas outside of, or farther from the edges of, the urban villages. It is grossly inaccurate and deceptive to lump all SFR areas together and not consider transportation, utility and other impacts on specific SFR zones across the City taken in their specific context.

## Ann Mueller

10/2/2017 17:00

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impact on Solar Access to abutting properties.

Noise impacts from allowing a DADU to locate in a yard setback.

Impact of increasing impervious surfaces and the removal of vegetation and the potential for creating micro heat island where there were none before.

I also believe that if you are going to look at allowing taller ADUs located in setbacks than what is currently allowed and allow exceptions you need to consider the visual impacts to other residents in single family zones as well as the impact on existing territorial views that would not be blocked setbacks are maintained.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Consider a one-story height limit to reduce the impact of an ADU to adjacent properties. (impacts being less solar access as well as reduces the impact on views and light to surrounding existing homes in Single Family Zones).

There should be a limitation on the size of an ADU based on lot size and the size of the existing residential structures and an overall limit on total impervious surfaces on a lot that is considering an ADU. More impervious surfaces and the removal of existing vegetation creates heat pockets and micro climates and well as run off and

storm drainage impacts to surrounding residents.

Please retain the requirement that a homeowner has to live in the primary residence or the ADU so these don't become investment properties.

If a two story ADU is to be allowed the onsite vehicle parking should not be waived. An ADU should not be a right but something an existing homeowner can do if they meet setbacks, don't block solar access or views and can provide off street parking for an ADU that is more than 1/2 from a light rail stop.

## Sloan Ritchie

10/2/2017 17:26

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Housing affordability: ADUs and DADUs are a key source of affordable housing that is easily intereated into the existing fabric of seattle's neighborhoods.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am in favor of Alternative 2 (the new and improved ADU rules). Thanks.

## Jordan Monez

10/2/2017 17:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I think Alternative 2 (taking action) is a step in the right direction toward making Seattle more affordable and ADUs and DADUs are a great way to densify without much impact to the character of neighborhoods. We need to see more solutions to creating affordable housing before low- and middle-income people (like teachers, artists, social workers, etc.) leave Seattle due to the lack of affordable housing.

## Fred Ringenburg

10/2/2017 18:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I support increased flexibility in permitting ADUs to encouraging additional ADU creation. Likewise, I support eliminating parking requirements. However, I strongly believe the main residence needs to be owner occupied. Otherwise, this will be an excuse for absentee landlords to essentially create triplexes in single family neighborhoods without the commitment to maintenance and community involvement.

## Emily Krisher

10/2/2017 19:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impact of carbon emissions from sprawl as people are forced to move further from the city center to find affordable places to live.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am in favor of all options in Alternative 2. We are in a housing crisis, and it is time to creatively think about how we can increase housing options in all neighborhoods. A disproportionate amount of land in Seattle is zoned for large, single-family homes. Relaxing the DADU and ADU rules will allow these neighborhoods to contribute to Seattle's needed affordable housing.

**Theresa**

10/2/2017 21:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) I think that the single-family neighborhoods would still want to appear as single-family. The entrance to an AADU should be on the side or back of the primary home. 2) Will rules about owner-occupancy be retroactive to previous AADUs?

**Do you have other comments or suggestions related to the scope of the EIS?**

**Teresa Dietze**

10/3/2017 8:07

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Permitting has become expensive enough to discourage many who might otherwise choose to build DADUs.

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see the DADU limit increased to 1000 sf. That size is workable for the expense of building, while 800 sf is not currently worth the cost since building and material prices have increased so much and permitting is so high.

**Anne Noonan**

10/3/2017 9:07

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The basics-sewer capacity, runoff, parking near people's own home, tree removal to attain density, air quality (yes, they are bringing their cars). Let individual neighborhoods decide if they want this, not the city council or developers, after we have the infrastructure.

**Do you have other comments or suggestions related to the scope of the EIS?**

Once again the city is trying to do social engineering without the infrastructure-denser housing without mass transit. Road diets without thoughts of good traffic flow. Bus bump outs that obstruct traffic. Let's put on the brakes here. (Oh we are doing that already.) The city is already overcrowded without the services needed. Consider this ADU situation in the years after you've got some infrastructure. Sewer treatment at Discovery Park is dicey, Loehman Beach pump station stinks already (I walked there last Sun. 10/1) all the apartments and new apts. create long walks for residents in many neighborhoods to find parking. Overcrowding does not make for a healthy

living environment.

## R Keith Unterschute

10/3/2017 9:16

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am all for easing the restrictions on building DADUs and AADUs but the one fear I have is that developers will find a loop hole in these rules and merrily go about destroying neighborhoods with DADU equivalent structures that we have seen proliferate throughout the city like McMansions and skinny houses that replaced perfectly good single family dwellings.

Any change to the current restrictions should have strict oversight to detect trends in how developers or homeowners are using these new restrictions to make sure that we don't get run away development of structures that damage our precious neighborhoods. Perhaps every 6 months or a year these restrictions should be revisited and tweaked to ensure no loop holes exist for extended periods of time.

I am thrilled that the city is rethinking the restrictions on these dwellings but i have two fears. The first is unscrupulous developers and landlords who make changes to neighborhoods that benefit them only and leave those living in the neighborhood with a neighborhood that is significantly less livable.

### **Do you have other comments or suggestions related to the scope of the EIS?**

**Parking:** I am all for removing the parking requirement since I think it is much too restrictive now. However, parking and traffic are going to be a problems if the number of AADUs and DADUs are allowed to grow. There are some parts of the city that already are seeing massive parking and traffic issues due to greater condensed housing. I live near the University Village and I can attest to the traffic challenges. Now it can take 20 to 30 minutes to get to the freeway during rush hour. Seattle has allowed Apodments with no parking which requires the assumption that the folks living there will not have a car. We should be able to do that for those living in DADUs and AADUs. Since the addition of DADU and AADU's will generate tax dollars, perhaps some of those tax dollars can be put toward a system to limit the number of on street parking spaces a single residence can use. If a single house has two authorized on street parking permits but no off street parking then if they add a DADU or AADU they should still only have two on street parking permits. If the home has one car, then the person in the DADU or AADU can have a permit to park their car on the street.

**Owner-occupancy:** I think owners living in their dwellings at least 6 months of the year could help keep homes with DADUs and AADUs from becoming small apartment complexes that destroy neighborhoods. I would not like to see this happen.

**Maximum height:** I think that increasing the height will cause a sprouting of very high DADUs in neighborhoods where lots of houses are a single or double stories. There has to be some way to keep the height limits such that standard sized houses in the neighborhood aren't dwarfed by higher DADUs.

**Maximum square footage:** We do allow McMansions to cover almost an entire lot and go up three stories so the current restriction on lot coverage doesn't make sense. The current lot size is keeping me from building a DADU in my back yard. However, this is one restriction that if changed will have to really think about the potential of developers from tearing out a home and putting in two homes on the same lot.

## Michael Roberto

10/3/2017 9:16

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I think the housing & socioeconomic impacts are the most important facet of the study!

## Krystal Miller

10/3/2017 9:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I hope this process is done quickly, embarrassed to see the residents of Queen Anne fight this hard against diversity in their neighborhood. Urbanizing an existing city to protect outlying areas, natural resources, and ecosystems is key to protecting our environment in a time of growth.

## Gregory Vouros

10/3/2017 9:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Adequate Off-Street Parking; Lot Coverage and its effect an increase of impervious surfaces will have on the water table; Lot Coverage, and the effect increased impervious surfaces will have on the storm water and sanitary sewer systems in terms of capacity and the need for upgrades to the utility infrastructure; Impacts that proving no off-street parking will have on parking and street congestion; Impacts proposed setbacks will have on public safety, i.e. the ability to contain dwelling fires; Impacts proposed setbacks could have on the ability of adjacent property to utilize solar panels and the potential obstruction of sunlight on these panels; Impacts increased density and building heights could have on the quality of of life on adjacent property owners, i.e. reduced direct sunlight, increased rain run-off, etc.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The City's assumption that if you eliminate vehicle parking through the City people will no longer purchase and drive vehicles is probably the biggest fallacy in your analysis. Many of our streets do not have the capacity to accommodate increased parking AND the resulting reduced traffic lanes caused by on street parking. This analysis must be part of the overall assessment.

The description of the proposed changes shows a profound bias on the part of the City Council and planners with respect to allowing AADUs and DADUs. The proposal says: "change regulations in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADUs) in single-family zones." The uses of the term "barriers" demonstrates an implicit bias. Current going requirements are NOT "barriers." They are regulations adopted to protect residents, to ensure a level of public safety, and to minimize the impacts of over development on the environment. The City's proposal decreases these past protections and negates the effectiveness of past regulations. You are being intentionally dishonest AND misleading. It would be more honest to describe the proposals as: "eliminate current regulations in the Land Use Code to increase population density, to increase lot coverage, and

to discourage the ownership of privately owned vehicles within the City limits."

## Angie Gerrald

10/3/2017 10:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please consider a neighborhood's sewer infrastructure before allowing increased density. For example, in Sunset Hill, an old sewer pipe broke under Shilshole Bay and SPU is currently trucking out sewage for months, with temporary infrastructure and pump trucks operating right along the Burke-Gilman Trail and affecting area businesses/residents (e.g., The Canal event space has sewage trucks coming/going multiple times every day in their parking lot, and yes it stinks). Even when all is operating "okay" with our out-of-date neighborhood infrastructure, sewage flows into the Sound during heavy rain flow. In addition to sewage, please take into account maintaining permeable yard space and tree canopy, healthy setbacks and sun/light exposure for neighboring properties. Density AND livability/environmentalism, please.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Chris

10/3/2017 10:27

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Transient renter population that ADUs will bring to single family neighborhoods full of children. What regulations will be put in place to keep our single family neighborhoods and children safe?

### **Do you have other comments or suggestions related to the scope of the EIS?**

How will the city prevent the ADUs from becoming a bunch of AirBNB short term rental properties that can negatively impact the quality of life in single family neighborhoods?

## Sasha Muir

10/3/2017 10:28

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am completely apposed to this change. We are working towards making every neighbourhood gridlocked with traffic and people. Please stop the madness.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am completely apposed to this change. We are working towards making every neighbourhood gridlocked with traffic and people. Please stop the madness.

## Michelle Eggert

10/3/2017 11:48

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

RV Living - the proposal should include the option of creating legal long term RV living on SF lots. By requiring a sewer connection, water supply, and power. RVs must be street legal, etc. People of all income levels live in RVs.

My family owns a 55+ mobile home park in King County that includes RV living. The RVs are in top condition worth \$20,000-\$100,000. The RV residents are people with a 2nd home working in Seattle (construction workers, etc) or people who choose to live in an RV. Excellent neighbors.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Michelle E.**

10/3/2017 11:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow flexibility to designate which building is the primary building for the lot, and which will be the DADU.

Example: we have a rental house in an SF5000 zone within the South Park Urban Village. The house is 820 sqft. The lot has an alley in the back. We would prefer to designate the current building as the DADU, and then to build a new building with two units - a larger unit to be designated as the primary residence for the lot, and a smaller AADU.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Michelle Eggert**

10/3/2017 12:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow Tiny House to be called an DADU. A tiny house is like an RV - moveable and street legal. Includes kitchen, bathroom, and living space. Very attractive neighbors.

<https://seattletinyhomes.com/models/>

**Do you have other comments or suggestions related to the scope of the EIS?**

**Leah Missik**

10/3/2017 12:07

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the city to study city-wide rezones to LR4. I would also like the city to consider an "Alternative 3" that makes ADU and DADU development even easier. ADUs and DADUs are sorely needed for density and affordability. Anything that makes their development easier, the better.

**Do you have other comments or suggestions related to the scope of the EIS?**

I do not think aesthetics are appropriate for the EIS. This is a subjective topic, and is biased in favor of existing SF homeowners who have far more resources and power than the average Seattleite to begin with. Further, single-family zoning is too highly prioritized in this large city that has a worsening affordability problem. Density is one of the best ways to reduce carbon emissions and would help make the city more affordable.

**Melissa Kiser**

10/3/2017 12:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please look at building to 4 stories in the EIS and keeping DADU sizes as small as 800 SF. Design is making great strides and smaller DADUs allow more outdoor living space on some lots.

**Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 - This should apply throughout the city asap and should not be rolled out neighborhood by neighborhood.

**Renate Pinch**

10/3/2017 13:51

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

View/light blocking height and tree destruction

**Do you have other comments or suggestions related to the scope of the EIS?**

Access for fire safety and parking must not be ignored

**Jon Lisbin**

10/3/2017 14:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I'd like to see an option to reduce the cost of hookup to the sewer system; like done in Portland.

**Do you have other comments or suggestions related to the scope of the EIS?**

A little unclear about the alternatives above. Is alternative 1 the current regulations of the proposed regulation that prompted the EIS? I think that should be made clearer on this site so the public can provide proper input. If "no action" is actually the initial proposed changes to current regulations then this questionnaire may be misleading. Please clarify. Perhaps there should be three alternatives to cover "do nothing" and the other two alternatives above.

I also think there is a huge difference between the impacts of DADU's and ADU's and they should not be conflated in one proposal. DADU's are much more expensive to construct and have a greater environmental and neighborhood impact. ADU's, or mother in law apartments, are much less expensive to construct and will immediately address the family housing crisis in Seattle. Therefore there should be separate scoping/regulations for each type. Thanks for your consideration. Jon

**Eric Thomas**

10/3/2017 15:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see the positive environmental and affordability impacts of increased density included in the scope of the study.

## Allison Kelsey

10/3/2017 15:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

Yes - speed things up! Look at how few ADU's/DADU's there are in Seattle while we struggle to accommodate all our residents. Don't allow the concerns of a few to override a viable solution to this pressing problem.

1. Eliminate the parking space requirement except in RPZ's
2. The roof height is too conservative and it seems idiosyncratic to base it on lot width. At a minimum clarify the regs. Is it based on lot width at widest point? At point where the ADU will be located?
3. The proposal seems to be written in such a way as to allow 100% of the surface of a lot to be covered by home+ADU. Set a cap of 80%
4. If the city wants to reduce barriers to ADU's then there should be a one stop shop you can contact to support your going through the permitting process.

## Nancy Hevly

10/3/2017 15:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The topic of absentee landlords building and renting these unit should be extensively explored.

Anyone who has lived in a neighborhood with added units added to houses in a single family neighborhood, knows that these landlords routinely neglect their property, overcrowd their housing units and have the power to destroy family neighborhoods. Exhibit A: Drake Sisley. It is clear the city no longer wants families to live in the city but, at the least, you should resist turning our beautiful neighborhoods into slums.

### **Do you have other comments or suggestions related to the scope of the EIS?**

No use. The city already has decided what it will do.

## Darcy LaBelle

10/3/2017 15:55

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes

### **Do you have other comments or suggestions related to the scope of the EIS?**

I have been a real estate agent working in the city since 2001. I have owned and resided in my home at 2005 Boyer Ave E since April of 1999. The zoning and planning of this city is narrow minded and singularly focused with no long term view of livability. I see what an owner occupied condo building looks like compared to a condo building with no rental cap. Property values decline as does the quality and condition of the building, landscape and surround area. I am experiencing first hand your 'new' plan and have been forced to now look at a Renton sized outcropping with a permitted ADU being built behind it. There is no room on the streets for the increased number

of cars. Why don't you focus on creating an infrastructure first that can handle this increased density? You backwards approach, while might make sense to you in your meetings, doesn't work. It is time for this city to stand up for something that we long lost when you were elected.

## Jamie Vrsek

10/3/2017 16:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please please please consider that most homeowners would prefer to utilize their existing garage structure, if possible. This option would be more accessible to many homeowners. THE DADU sqft limit should NOT include the garage area.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Please change the code to allow me to add a unit above my garage, so that I can move there and allow my aging parents to live in my house. Please!!

## Michele Conner

10/3/2017 16:22

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. Design development guidelines so that the infill detached units are of a similar character to the main dwelling and the neighborhood. I'd rather see single family lots with DADUs of matching existing character than a bunch of boxy townhouses built to five feet of the property line. DADUs have the potential to increase density providing a great housing option while maintaining the character of the neighborhood AND give homeowners an income stream.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The proposed plan seems to be 180 degrees from the existing legislation. I'm guessing the new legislation will be somewhere in the middle. I'm in favor of all of the changes. As I wrote above, it makes better sense to me to infill on existing SF lots than to tear houses down, building town houses and drastically changing the character of our beloved neighborhoods. Is there not a middle ground if the new proposal cannot be adopted in its entirety? I support the ability to have both a DADU and AADU on the same property, removing the parking restriction and necessity for it to be owner occupied, increasing the square footage and heights of the DADUs as well as the changes to lot coverage. Like I said, this is a much better alternative to increase density while maintaining the character of our neighborhoods without having tear downs and boxy town houses. Thank you!

## Nick Etheredge

10/3/2017 16:34

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Please study Alternative 3 to allow much denser "missing middle" housing in all SFZ's - this includes rowhouses, townhomes, duplexes, triplexes, backyard cottages, etc. The environmental impact is that we minimize sprawl extending into the Cascades and open up Seattle to more families!

## David neiman

10/3/2017 18:08

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the EIS expand the study to look at the what would happen if single family zones were opened up to a variety of traditional residential uses such as duplex, triplex, cottage housing and the like, as recommended by the HALA committee.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Michael Jones

10/3/2017 18:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking and traffic are not being addressed for the City of Seattle as more people move to the City. Eliminating the requirement for off street parking shows to me that the City is simply hiding its head in the sand when it comes to dealing with parking and traffic. Seems like the City hopes this parking/traffic issue will solve itself, but in my opinion, the City could not be farther from the truth.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Seattle needs to have a workable, REALISTIC plan for parking and traffic. It currently does not: it hopes that people will take mass transit (insufficient) and bike or walk. This is not realistic. Before the City adds affordable housing and ADUs, the traffic/parking issue needs to be deal with realistically. Currently the City's plan for housing along with traffic/parking is a travesty.

## Bryan Kopel

10/3/2017 19:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Encourage the use of non-toxic construction materials.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Make certain that car parking is not required or prioritized.

## Carol Burton

10/3/2017 19:35

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Limits to the number of ADUs - detached or attached, on a block that are built to be rented as air bnb units.

### **Do you have other comments or suggestions related to the scope of the EIS?**

no

## heather hargesheimer

10/3/2017 20:15

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

consider limiting ability for very short term rental (ie airbnb) to one of the three possible units

### **Do you have other comments or suggestions related to the scope of the EIS?**

yes! would really like to see alternative two accepted it is a much better solution for seattle. the single family zones CAN handle more density and need to.

## Single family zones should not be made into absentee rental zones with no parking available.

10/3/2017 20:29

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Garrett Nakamoto

10/3/2017 20:32

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please consider lots smaller than 4000 sf for this EIS as well.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Thank you for doing this study!

## Cindy Burke

10/3/2017 21:45

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Financial incentive and/or text credits for homeowners who rent and stabilize rent at below market rate. Possibly even small grants to help kickstart the construction process if people agree to charge below market rent for five years.

Strong incentives to include solar energy panels in construction plans - maybe a shorter wait for permitting or lower cost permitting. Or a four-year discount on property taxes if solar panels power >80% of the electrical needs.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I'm in favor of many of the expansions being considered.

I do think that the primary barrier for most homeowners is the building and permitting cost, which is typically about \$100,000. If the city could pair with an architecture firm and provide a few, preapproved, easy to permit, lower-cost options for DADUs, I think that could encourage accelerated progress on this housing option.

I'm a single parent who is lucky enough to own a home with an unused garage. I would love to build a small home

for another single parent there. The social benefits for both parents and the kids could be huge - support, child-care, another kid to play with, a yard. And I live right near a great elementary school and transit. I'd want to charge below market rent - just enough to pay off the loan within 15 years. I'm not trying to make money, I am trying to help solve the problem of low-cost housing for people who aren't rich. However, the finances just do not work to make this feasible with upfront building cost of \$100,000.

Definitely get rid of the parking requirement, more and more young people do not even own cars now and the city should be moving away from cars as fast as possible.

I am in favor of keeping the owner occupancy rules in place. Otherwise I think you have a danger of several buildings on a single property that get run down and are not maintained with an owner who lives out of state, or houses that are used for illegal activities and no one is living there who has skin in the game. That really brings a neighborhood down and ticks off all of the neighbors.

## Victoria Nelson

10/4/2017 8:09

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should address the evaluation of impacts of reducing permeable surfaces on the property and surrounding areas.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## tarrell kullaway

10/4/2017 10:33

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please make it easier to have more square footage. 800 is not enough

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Paul Brookshire

10/4/2017 10:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

no

### **Do you have other comments or suggestions related to the scope of the EIS?**

no

## Laura Hinkelman

10/4/2017 10:38

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see an analysis of how this change would affect affordability in Seattle. I am not convinced that adding accessory units would help. People who can afford to add a unit would probably not want to rent to people

with low incomes, so the only way this would help is if middle class people started renting these small units, and I hardly see the appeal. Maybe they would work for students....

**Do you have other comments or suggestions related to the scope of the EIS?**

**Kelli Refer**

10/4/2017 10:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the process expedited as much as possible. DADU's create a great housing option and also provide income for families that build them. Since our city is in an affordable housing crisis it is imperative that we open up single family zones to more dense housing options as soon as possible.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Paul Janos**

10/4/2017 10:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Noise impacts - particularly from above-ground decks and balconies. Shadowing and privacy impacts to neighboring properties. Aesthetics - developers strive to max bulk, and the existing guidelines for ADU's are not to provide more housing, but to provide more LARGE housing. The small-house concept is definitely NOT reflected in the permitted dimensioning - though it should be.

**Do you have other comments or suggestions related to the scope of the EIS?**

If Seattle truly seeks AFFORDABLE housing with de minimus impacts and permitting process, it would approve these and only these models.

<https://www.thespruce.com/super-affordable-tiny-homes-that-will-inspire-3017220>

**Fabio Governato**

10/4/2017 10:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I am in favor of removing barriers to the creation of accessory dwelling units (ADU) in single-family zones, especially those rules regarding maximum size and the parking spaces restrictions.

**Linda Hanlon**

10/4/2017 10:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Encourage solar, small wind and efficient water use.

**Do you have other comments or suggestions related to the scope of the EIS?**

Housing is desperately needed. Airbnb and other leasing arrangements need to be regulated. They are fine except

when they drive up housing costs or reduce housing availability, which should then be subject to additional review and taxation.

## Susan Helf

10/4/2017 11:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I support Alternative 2. Make it as easy as possible for homeowners to build ADUs and backyard cottages.

## Scott Cooper

10/4/2017 11:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the EIS address the topic of affordability through the lens of a homeowner looking to stay in their current house. Does building an ADU/DADU help them cover their mortgage/taxes and contribute to greater stability? Can ADU/DADUs be a tool to reduce displacement in increasingly expensive single family neighborhoods?

**Do you have other comments or suggestions related to the scope of the EIS?**

## Ellen Barton

10/4/2017 11:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Water run off - add requirements for rain gardens, permeable pavement

**Do you have other comments or suggestions related to the scope of the EIS?**

Will tree removal be necessary? If so, will new trees be planted?

## Michael Kostis

10/4/2017 11:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Overall, I'm in strong favor of Alternative 2. I do have some hesitations about not requiring off-street parking, but not enough to consider Alternative 1.

**Do you have other comments or suggestions related to the scope of the EIS?**

The change I am most excited about is the Maximum square footage change for a DADU to 1,000 square feet, excluding garage and storage areas. If it were even 800 square feet, but excluded the garage, I would be on board.

## Michael Connolly

10/4/2017 12:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

If you removed the owner occupancy rule, I would build immediately. If you want more housing, let me do it.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Eric Johnson**

10/4/2017 12:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think attached ADUs should be addressed along with detached.

**Do you have other comments or suggestions related to the scope of the EIS?**

I think this proposal is necessary and timely due to the rental housing shortage that is driving up prices for renters in Seattle. This would give renters more choices, flexibility in locations, and availability.

**Rene Fresquez**

10/4/2017 12:38

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Consider removing parking requirements when near bus lines

**Do you have other comments or suggestions related to the scope of the EIS?**

**Robert Murray**

10/4/2017 12:38

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking. No new building whatsoever (most definitely including "low-income" housing units) should be allowed to be built in the inner city without substantial allowance for vehicle parking. Thoughtful exceptions should be considered for Dadu and Adu units in and behind existing homes. Outside the downtown core and designated neighborhood cores, lot coverages should not exceed 75%.

**Do you have other comments or suggestions related to the scope of the EIS?**

The nature of the Growth Management Act is to encourage thoughtful in-city increased density, necessitating additional dwelling units in single-family zones. Population will increase- now determine the most efficient and affordable solutions where we already have the best infrastructure for transportation and utilities and ultimately the best access to jobs, services and entertainment. Every effort should be made to encourage safe, safely accessed, complete living units of reasonable size in all inner-city residential zones. Apodments in every basement and attic would substantially appease the housing shortage and help current residents afford to retain their homes by means of rental income.

**Gordon Padelford**

10/4/2017 14:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Potential per-approved designs or anything else that would help streamline the onerous process.

**Do you have other comments or suggestions related to the scope of the EIS?**

Please be bold in your potential options. The biggest potential impact is not doing enough to address our housing affordability crisis.

**Benj Wadsworth**

10/4/2017 14:46

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I strongly suggest that the EIS evaluate the NEGATIVE environmental impacts of NOT adopting Alternative 2, or to put it another way, the positive impacts of Alternative 2. Loosening restrictions on ADUs and DADUs, specifically removing the owner occupancy requirement and allowing both an ADU and a DADU on a lot, will create additional housing within the Seattle city limits and thereby help prevent urban sprawl, leading to a decrease in land conversion outside of the urban growth boundary and a decrease in traffic regionally. In addition, ADUs and DADUs create affordable housing options that enable lower and middle income people to live in Seattle's Single Family neighborhoods, a possibility that is becoming more and more difficult with rising housing prices.

The current owner occupancy requirement is creating a situation that is entirely counter to all of Seattle's housing goals. Developers and homebuilders are tearing down small existing homes and building the proverbial McMansions because this is their most profitable option in the SFR zone. As a result, we are seeing the construction of 3500+ sq ft houses that replace lower cost houses and effectively eliminate the option of ever creating an ADU or DADU on the effected lots, as the houses take up all available space and generally contain finished basements. One such house down the street from me in Wedgwood (not a particularly high income neighborhood) just sold for \$1.6 million dollars and was purchased by a family of three! This is not the outcome that anyone in Seattle desires. Eliminating the owner occupancy requirement will give builders additional options and result in more less-expensive housing options in the SFR zone, a positive impact for all of the reasons mentioned above.

Finally, I suggest considering a third alternative that allows duplexes and triplexes in the SFR zone. This is the direction that Seattle needs to move in order to meet its sustainability and equity goals.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jennifer Hawkins**

10/4/2017 14:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

This is a terrible idea. I bought in single family zone to have nice setbacks from neighbors. The current ADU BIG boxes towers over adjacent houses, create lack of privacy. Limit ADU's to NO higher than adjacent houses. Parking becomes even MORE problematic. My neighbor has three cars, another has two plus two for the ADU; and we only have on-street parking. Limit pavement and demand better landscaping/ fencing.

**Do you have other comments or suggestions related to the scope of the EIS?**

If you want density, build in CURRENT zoned areas for density, multifamily housing. The idea people will take the bus does not work in my neighborhood. The buses are already over-stuffed, and bus schedules have been reduced. The alternative is one has to transfer for a 2 mile bus ride or walk 15 minutes to a frequent bus.

## Joan Davis

10/4/2017 15:33

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I live in the Ravenna Cottages, 6318 5th Ave NE, which is perfect for me (900 sq feet total on 2 floors-9 units with garages, and ample storage rooms. ) I understand that Zoning doesn't allow for Cottage housing within Seattle City limits. I would recommend that Cottage housing be revisited.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Tegan Mulholland

10/4/2017 16:27

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Compare parking requirements without the assumption that only one or two adults live in single family houses today. I am a single family homeowner and my household includes four adults. If I converted part of my house to an AADU, the number of adults and number of cars would not be likely to increase.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Due to the topology of my neighborhood, we all have rear yards that aren't visible from the street. Some rear yards aren't even accessible from the street, and have to be accessed by alley. There's no reason to limit rear yard coverage in places where the yards are tucked away and not usable as outdoor spaces from current homes.

## Jon Jaffe

10/4/2017 19:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

If the developments are permitted to have rooftop decks, I would like to know how the City is planning to mitigate cooking smoke and noise issues. I am concerned about how green space will be added to offset what has or will be been lost to development. We should be encouraging development in communities with high walkability score that can be car-less. Many other communities do not have sufficient off street parking or can accommodate more traffic from cars.

## Joel Flank

10/4/2017 19:23

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I don't want lower barriers for ADUs. I want exactly the same barriers for them as any other construction project. It's adding a house to the neighborhood - so it needs to account for permitting, zoning, parking, sewer and other infrastructure requirements, impact on school capacity and road capacity, additional police and emergency coverage, etc. ADUs shouldn't be able to avoid any of these things or more - a new unit is a new unit, and there are costs to the city to manage that growth.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Mark Schletty**

10/5/2017 9:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Above "alternative 1" is reasonable. "Alternative 2" is a disaster designed to backdoor convert our single family zoned neighborhoods into 3 unit per lot multifamily rental zones. It needs to be rejected out-of-hand as the unconscionable intended deceit of the citizenry that it is.

**Marian**

10/5/2017 9:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Design Standards and Historical applications of this very necessary land use, exists for ADU's. in Santa Monica, CA, online; see also DPZ, Town Planners, or, The Congress for New Urbanism

**Do you have other comments or suggestions related to the scope of the EIS?**

This will retain the character of Seattle's historic housing as it creates jobs and opportunities.. This will allow all of us to live/ work/ walk in Seattle's neighborhoods: rolling along in a stroller, walking to the bus go to work, or heading for local coffee into old age.

We need all ages to be whole and healthy, to contribute to the community. THIS is economic development.

**ian**

10/5/2017 12:04

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

why EIS take so long.

**Do you have other comments or suggestions related to the scope of the EIS?**

Way to expedite the EIS process.

**Jeff McHegg**

10/5/2017 12:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I am vehemently opposed to the adjustment or removal of the owner occupancy covenant from the requirements for establishing an accessory and/or detached accessory dwelling unit. This owner occupancy is fundamental in maintaining a local and responsible building owner as a member of the neighborhood in lieu of detached real-estate investors and Air B&B operators who devour the city's (barely) affordable housing stock and add nothing to the need for affordable housing. The owner, living on site either in the primary residence or in the accessory dwelling ensures that there is someone in the neighborhood who is accountable. Maintain the full requirements for the

property owner to live on-site for 6 mos. out of the year except as exempt or due to hardship - allow no changes to this owner occupancy requirement.

The other proposed changes as presented are acceptable in my opinion.

## Jennifer Davison

10/5/2017 12:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I hope that the EIS will address the environmental impact of \*not providing ADUs\* and other affordable housing, including impacts to people's health and wellbeing when they have to live on the street; and to the physical environment due to the effects of homeless populations and the effects of further development into undeveloped landscapes.

## Kate Gregory

10/5/2017 13:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Not at this time.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm mostly concerned with soil permeability, tree canopy and aesthetics that fit the neighborhood. I agree with all the Alternative 2 suggestions, EXCEPT for #3. I feel very strongly that the owner must live in one of the dwellings. If the owner is not a resident, there should be a substantial fine or a fee added to the property tax.

## Claudia Bach

10/5/2017 17:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I believe that the newly outlined proposals are a positive move for our neighborhoods and support the efforts to increase ADUs and DADUs in all neighborhoods. It is important to not count the square footage of an existing detached parking garage in the square footage of a new DADU -- it makes sense to retain that parking, while creating a reasonable size DADU that may, or may not, be attached to the existing garage. I hope this issue will be addressed.

## James Miller

10/5/2017 19:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking

**Do you have other comments or suggestions related to the scope of the EIS?**

Regardless of what the City publically states and promotes, the majority of people in this City own a car and drive. The EIS should shift through the lies promoted by the City and truly use facts related to cars and parking. It makes no sense to use City parking and driving data that is intentionally skewed, purposefully omits critical data, and in some cases falsifies data for their own ends. An impartial EIS needs to see through this because allowing ADU destroys neighborhoods by not acknowledging the fact that we need places to park cars.

One of many examples of how the City has worked to manipulate the data. The City likes to quote that just over half the people working in Downtown Seattle get to work via means other than single occupant vehicles. To which you need to say "so what". The City data is misleading and irrelevant to the amount of cars in the City of Seattle. 1) What is important is all the cars using the City, not just the employees - I do business in the City and drive there all the time but I am not counted in their metric - don't let the City define the problem - and don't be as dumb as they hope you are - these are real issues and problems. 2) What is important is that the 'facts' that the City uses is self-reporting of a sample of employees - these are not real traffic counts, this is reporting by people who respond using their idealized self.... try asking people how many hours a week they exercise... then compare against actual data. 3) If parking was not a problem, then explain the rise of RPZ zones in the City of Seattle. 4) If no one drives, explain why the City parking garage is always full of City cars, leaving patrons nowhere to park when visiting DPD (or whatever they want to call themselves this decade). 5) In order to get their "data" about >50% don't arrive in single-occupant vehicles, why did the City need to expand the borders of Downtown to get that figure?

My point is this: there are so many instances in which the City purposefully misleads its citizens and traffic, parking, and car use. In the case of an EIS, someone has to ask the hard questions and not take the City at face value.

**Ian Crozier**

10/5/2017 21:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The cost of regulatory delay for the environment, economic segregation and housing affordability.

**Do you have other comments or suggestions related to the scope of the EIS?**

Scope must account for temporal aspect of decision-making process. How much value is lost for each month of maintaining growth quarantines and single-family zone segregation?

**John Shafchuk**

10/5/2017 22:26

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

NO

**Do you have other comments or suggestions related to the scope of the EIS?**

I think the changes to the current ADD and DADU are good and should be adopted. I'm okay with off street parking still being required.

**Joel Colvos**

10/7/2017 6:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Please don't let a handful of Queen Anne NIMBYS determine what is possible and needed for the rest of the city.

**Joel Miller**

10/7/2017 9:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please address the SDCI permitting process for ADU construction. Many simple remodels require a relatively easy to obtain STFI permit. However, an equally simple ADU construction requires full plan review. This is a much more complex process for non-professionals to undertake, and the plan review backlog current runs over 4 months. This added hurdle adds significant time and cost to homeowners wishing to add an ADU, discouraging homeowners from undergoing the necessary permitting and regulatory processes.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Roman Pohorecki**

10/7/2017 10:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Seattle calls itself a sanctuary city, but it's in name only. "You're all welcome here, just not in my neighborhood, ok?" This city MUST relax zoning laws for things like ADU or we will quickly become like San Francisco with median home prices well over \$1,000,000. Stop acquiescing to home owners who constantly want to dictate how others should build and live. Let density happen.

**Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 is so much better.

**tony soffe**

10/8/2017 6:51

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

All for it. Is there anyway for my email address to be updated throughout the process.

**Do you have other comments or suggestions related to the scope of the EIS?**

Would there be size requirements? ie; minimum or maximum square footage allowed? Or would it be based off the lot size?

**Ken Molsberry**

10/8/2017 15:08

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) In the Housing & Socioeconomics section, I believe "Potential impacts on neighborhood character of non-owner occupied multi-family development in single-family-zoned neighborhoods." should be added to the list.

2) In the Land Use item, "Potential impacts on vegetation, tree canopy, and environmentally critical areas (ECAs)", I believe "soil water retention" and "the value of private open space in an urban environment" should be added to the list.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Brendan Rahman**

10/8/2017 17:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Bravo for offering an alternative with no parking requirements. We should be worrying much more about the ADU impact on housing affordability (important) than its impact on parking (not important).

**Nancy Kuta**

10/8/2017 18:37

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please be sure there is adequate infrastructure throughout the city, not only for DADU units, but for the thousands of apartments which have recently been built by developers. I'm amazed that people are concerned about parking when creating parking spaces in large apartment buildings and definitely in apartments, has been a non-issue. These large buildings which house hundreds of residents have not been built to provide residents adequate parking. Residents may take public transportation to work which typically is nearby but many still own cars which they use on the weekends or occasional day because of their schedule. I don't see parking being a problem in single family neighborhoods where there is adequate parking.

**Do you have other comments or suggestions related to the scope of the EIS?**

Please allow these units to be built as quickly as possible.

**Tracy Domingues**

10/9/2017 8:41

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

i am concerned about the impact to changes in the parking ecosystem that this potential change will cause.

**Do you have other comments or suggestions related to the scope of the EIS?**

Clearly, Seattle needs to do something about the supply of housing in the city. I favor increased density in residential neighborhoods, particularly properties located on arterials in residential neighborhoods. However, I think that ADUs should be available to all properties in the city.

Personally, I am in favor of paid parking on all city streets. I do not support on-street parking permits, unless those are city-wide and paid parking is simultaneously instituted for those who do not have permits. When there are not permits contiguously on streets, the next available street without permits gets inundated. Many people who have on-property parking available to them, don't use it for their cars. If people who have garages and driveways choose to repurpose those spaces, then those people can pay for parking on the street. Also, I think it's unrealistic to think that small-sized ADUs won't have cars associated with them. Ideally, parking benefit districts would be

more persuasive to the people who live on the streets to paid parking on all streets.

## Jeff Ruehlmann

10/9/2017 11:05

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the height limit raised for non-gabled or asymmetrical roofs on DADUs.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Sharon Heiber

10/9/2017 11:13

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am writing to endorse the proposal that DADUs not be limited to property owners who live on-site. We would love to build a DADU (on our large city lot) if we could have the option of renting both our house and the DADU in the future. Thank you for your work on this process and taking my comment into consideration.

## Dennis Conner

10/9/2017 12:46

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

This concept of allowing up to three ADUs to SF properties and non owner occupied ADUs makes huge sense. It's a great way to add concentration in the City without creating large multifamily units like HALA proposed in SF neighborhoods. And it allows for that concentration to be spread throughout the City and not just in a few designated areas like HALA proposed. I like this idea.

## Eric

10/9/2017 14:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Minimum lot size for a DADU is indicated to be 3,200 sf under Alternative 2. As many lots in the city are platted at 3,000 (not 3,200) has there been or could there be any consideration to allowing the minimum lot size to 3,000 sf under alternative 2. I own a single dwelling home in the Phinney Ridge/ Green Lake neighborhood. We would consider adding a DADU unit over our existing detached garage to accommodate our family (owner occupied) if it were allowed. As a sidenote- I believe we are allowed to add over the garage under current zoning code so long as it was attached as any addition /connected to the main house (part of second story). It seems limiting to allow an addition over the garage as part of a whole house remodel/addition but not allow a more simple addition of a DADU over the garage on the grounds that it has its own entrance. If DADU's were allowed on 3,000 sf lots this would not be an issue.

**Do you have other comments or suggestions related to the scope of the EIS?**

**George Lee**

10/9/2017 17:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

PASS ALTERNATIVE 2!!!! MORE EASIER ADU/DADUS!

**Do you have other comments or suggestions related to the scope of the EIS?**

PASS ALTERNATIVE 2!!!! MORE EASIER ADU/DADUS!

**Jean Anton**

10/10/2017 19:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

possibility of separating a single family lot with a DADU and selling it separately

**Do you have other comments or suggestions related to the scope of the EIS?**

I believe alternative #2 is the best option on all counts

**Marie Baraldi**

10/10/2017 20:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No.

**Do you have other comments or suggestions related to the scope of the EIS?**

Interested in building a backyard cottage; I think more should be built in Seattle.

**Grace Carpenter**

10/11/2017 14:56

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Nothing else - this looks pretty comprehensive

**Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 looks very reasonable and addresses my concerns about DADU restrictions in Seattle. I would strongly support Alternative 2. I think more DADUs would help create more affordable housing.

**Leslie**

10/11/2017 15:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. Because of all the new rules AGAINST landlords, why not give them a tax INCENTIVE if they own and rent out an ADU?!

**Do you have other comments or suggestions related to the scope of the EIS?**

There are financial barriers to building and renting an ADU, so compensation from the city would make many more happen!

**Laurene K Lundberg**

10/11/2017 18:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Eliminating on-street parking leads to narrowed streets as cars line both sides. It makes a difficult passage for emergency vehicles (fire trucks), garbage trucks and delivery trucks. When you take out driveways, you eliminate possible vehicle turn-out areas. The streets become limited to one lane, forcing vehicles headed in opposite directions to back up to the nearest intersection.

**Jennifer Fujimoto**

10/11/2017 21:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Please definitely consider Alternative #2 for Topic 5 - Maximum square footage of 1,000 square feet, excluding garage and storage areas. In particular the exclusion of garage and storage areas opens up more possibilities for carriage house type DADUs and artist live/work spaces. The current 800 sqft inclusive max is prohibitive of this type of flexible solution.

**Rachel schilke**

10/11/2017 22:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Nope! Looks great

**Do you have other comments or suggestions related to the scope of the EIS?**

I am very much in favor of option 2!

**Denny Conner**

10/12/2017 10:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

It would be great if ADUs and DADUs could have separate metering if the property owner wanted. My wife and I have an ADU in our home and it's always guesswork to figure out how much electricity and water get used by the renters.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jeanne Merritt**

10/12/2017 14:49

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I strongly prefer Alternative One. My first concern is in regard to parking requirements. As a senior who has lived in West Seattle most of my life and in my current home for 24 years, I am finding that some of my friends have mobility issues and must park near my home. If the street is clogged with cars, such friends cannot visit and our quality of life suffers.

My second concern regards owner occupancy. I strongly prefer that one unit per lot must be owner occupied for at least six months per year.

**Choy Vong**

10/12/2017 20:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Do you have a model showing how a lot with 2 mothers-in-law look like? 60% of the back yard coverage means the counting is from the foundation back to the back of the property?

**Do you have other comments or suggestions related to the scope of the EIS?**

**Sylvia Schweinberger**

10/13/2017 14:30

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Special emphasis on looking at the Sewer Capacity within the city. We have had one large sewage spill due to a failed part and an overamount of drainage due to one large storm causing the only sewage treatment plant to fail. This allowed raw sewage to spew into Puget sound for months and cost millions of dollars to fix. Since then I have heard of one more sewage line break in the neighborhood just east of golden gardens at exit of the Locks. The sewage has to be trucked from one sewage pipe to another until this break can be fixed. No information on the cause but the amount of new buildings now must be straining sewer capacity. Also, supply water pressure is low in some neighborhoods already - look at Phinney Ridge. The city is required to supply a pressure of 36psi. There are lots of new buildings there and the amount of flow is being reduced. Will pump stations be required in areas at the top of hills that have minimum water pressure to accomodate all the new buildings. How will increases in sewage outflow affect the environment in puget sound in particular in relation to oxygen levels in the water and health of the ecosystem for animals like Orcas and salmon?

**Do you have other comments or suggestions related to the scope of the EIS?**

Reduced parking requirements especially in neighborhoods should be studied because I believe parking should be required for all buildings. Seattle is an old city and was not designed for the amount of cars people have now. I own two rental properties and have never rented to a person that didn't own a car. My properties do have off street parking but the neighborhood they are in has many homes that don't have garages. The neighborhood was built to accomodate parking on the street and the street parking is close to getting used up. This is in a neighborhood with good bus transportation to downtown and northgate, on Phinney Ridge. Even though people have

good transportation in a walkable neighborhood, they still own a car and the couples I rent to have one car per person - two car households. This is common - ask any apartment owner or apartment dweller. Do a study and not a biased study. Use DMV records and match them to the owners address. I'm sure you will find that the majority of apartment dwellers own cars. I read many articles about empty garages at apartments and how developers say they are too expensive to build. But apartment dwellers will try to save money if parking is a separate charge, by parking on the street. We need to be realistic and require that builders put in infrastructure for cars.

## Gerald Stewart

10/13/2017 14:49

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the name Backyard Cottage to be required instead of redefining that name as Accessory Dwelling Unit.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Dominic Aspria,

10/14/2017 7:53

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Leave our single family properties alone!!! with the new proposals the parking will be very limited!! Our Property tax will be higher even if I don't own these units on my property!!! If you want more low cost housing build more apartment houses in the area where they are already authorized and make them low cost!!!

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Tyler

10/14/2017 8:56

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Why doesn't the city consider allowing 2 detached 500 sq ft micro units if the owner chooses vs one 1,000 sq ft detached ADU? Overall I think this is a great step forward for the city though!

## Caleb Heeringa

10/14/2017 15:49

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see a third alternative studied that analyzes the environmental impact of adding duplexes, triplexes and denser forms of housing to single-family zones as suggested in the HALA plan. Many cities allow these sorts of denser housing options, and as long as city staff is investing resources in analyzing the impact of ADU/DADUs, it would be a missed opportunity not to use this EIS to take a more holistic look at the value of denser housing in a growing city like Seattle compared to the status quo, which is essentially suburban zoning patterns.

## **Do you have other comments or suggestions related to the scope of the EIS?**

Please ensure that any analysis of: tree canopy, vegetation, impact to environmentally critical areas, car ownership, water, sewer and stormwater, affordability, etc. take into account the fact that housing demand does not end at Seattle city limits and that a lack of housing in the city affects demand for housing outside the city. Please include an analysis of the carbon emissions related to infill housing compared to housing outside the city, further away from reliable transit, biking and walking infrastructure.

## **Emmy Anderson**

10/15/2017 9:28

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

1. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

2. Use Green Building incentives similar to other permit types:

Allow 10% increase in size and height for projects on lots over 4000 SF

Allow 20% increase for lots over 5000 SF

3. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired.

Allow Residential Small Lot zoning without MHA in Overlay.

Make parking requirements therein voluntary

4. Legalize non-conforming housing types and uses, such as duplexes, established before 1995. Let's not penalize properties that already provide extra dwellings. Let their owners maintain, upgrade and expand them without needing to avoid scrutiny.

5. Buffering detached houses from higher zones:

If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

6. Land use changes to make accessory dwelling units easier to built:

Allow exceptions for handrails and parapets over height limit.

Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total.

Allow separate metering of utilities.

When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks.

Extra height for flat roofs when used as a green roof.

7. Create incentive program for owners to rent to low income neighbors via property tax discount.
8. Study impact of split ownership of house and cottage structures. Seattle has no starter houses.
9. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established.
10. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, affordable housing would be sprinkled everywhere.

## Gail Bloom

10/15/2017 11:23

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

As a senior, I would like to build an ADU or actually DADU for myself so the I can live independently from my children - we could care for each other but have space for privacy. The new legislation makes that easier but it is still very limiting because of setbacks front and rear and 35% lot coverage. I need a single story unit with generous paths of travel - this is not possible with my property. I see other nearby home on much smaller lots with much more lot coverage so I do not understand how this is the case for them and not for my situation. My friends say that the neighbors have something called non compliant structures - can I have one? Is there a process for that?

### **Do you have other comments or suggestions related to the scope of the EIS?**

Parking is a requirement that is difficult to achieve. I have explored additional parking solutions on my property. I understand that drainage is a big concern, but planners at the counter have been unhelpful in the extreme in suggesting how to provide new spaces. Apparently there is nothing available besides parking on sod that is legal. In fact, the planner suggested if I wanted to do something different, I should do it after my occupancy permits were issued. Surely there is some material that could be used that meets the objectives of drainage and common driveway standards that can be approved. I don't want to be gamey or violate the law.

The existing owner occupancy standards seem onerous and impossible to administer. My property is held in a living trust. Must my death be reported to the City and then would my children lose their housing security if I was hospitalized or worse passed. These deed covenants remind me of racial covenants so prevalent of the past which are nearly impossible to remove... even though they are illegal.

Thanks for your consideration.

## Jayne Williamson

10/15/2017 19:41

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I totally disagree with the proposal to removing barriers for adding ADU or DADU for two reasons. My biggest objection is the no parking requirement. I think the city is blind to the fact that people live in the Seattle area because they like the outdoors and like to hike and ski and boat. Uber does not take you to the ski slopes or hiking trails or tow your boat. These same people may not drive to work but they do own cars and need a place to put

them. The best place to put them is on their own property and not on public property. Not only is it impossible to drive two cars in opposite directions down a street including the Broadview neighborhood now... but also having more cars on the street just invites more car break in crimes. Cars are more accessible to the criminals. Also saying that the owners only have to live in the property 6 months out of the year is crazy. Who is going to monitor that. We have a neighbor who is already planning on renting his house out as a duplex even though it is not zoned for such.... maybe disguising as a ADU or Airbnb? Is it the neighbors responsibility to turn them in? And then live next to them? Please please reconsider these changes..... I do think they will have a greater environmental impact than is predicted and those who are proposing the changes do not live in the neighborhoods that will be affected most. I live in Broadview where the lots are large and can accommodate a DADU and ADU on the same property.... We have no curbs or sidewalks and already overflow from the apartments and townhomes is pushing parking into the residential streets where it is unsafe to turn the corner due to poor visibility and unsafe for pedestrians. Our crime rate has skyrocketed in the past few years too. Do not give criminals more access to cars!

## Zelma Zieman

10/15/2017 19:53

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

With the changes proposed in Alternative 2, would like to see the EIS address neighborhood impacts to parking, traffic, and road wear and tear; impacts to city infrastructure especially stormwater runoff; other impacts to utilities such as water supply and rates, power supply and rates; impacts to the city's migration flyway plan and tree canopy programs; and finally, potential decrease in housing stock due to owner not required to occupy property for 6 months (i.e. will more properties become Air BnBs and therefore not available as local housing). In addition, are impacts to these items being mitigated with impact fees or passed on to the general public?

### **Do you have other comments or suggestions related to the scope of the EIS?**

Concerned that once properties with ADUs and DADUs are allowed, this changes the zoning such that the structures on site can be replaced with duplexes, triplexes and row houses. In other words, back door route for multi-family zoning.

## Jason Weill

10/15/2017 21:06

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Backyard cottages are a great way to create infill development to offer lower-cost housing for Seattle's struggling working- and middle-class citizens. I encourage the council to proceed with legislation to encourage ADU creation. Removing owner-occupancy restrictions and parking requirements will help encourage more housing units to be created.

## Jim Lamb

10/15/2017 22:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I wish we could consider allowing actual duplexes and triplexes in single-family neighborhoods. I'm concerned Alternative 2 doesn't go far enough.

**Do you have other comments or suggestions related to the scope of the EIS?**

One concern I've heard voiced by ADU/DADU opponents is that this will cause the price of single-family homes to go up because developers will be bidding on them. I would be interested to see the scope include an analysis of how this change would affect the price of real estate.

**Matt Schonwald**

10/16/2017 7:58

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I am in support of this additional dwelling

**Kate Krueger**

10/16/2017 9:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please investigate the impact of removing the new side sewer connection requirement for DADUs (match DADU and ADU sewer requirements).

**Do you have other comments or suggestions related to the scope of the EIS?**

**Gabe Levin**

10/16/2017 10:42

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, sewer capacity, CSO runoff impacts, tree canopy impacts, quality of tree canopy, increased traffic congestion, parking impacts, the desire of existing residents to endure these changes, the rate of adoption due to investor incentives in the proposal (ending the six month/year occupancy requirement invites investors to find nominee purchasers and flout a rule that expires after one year)

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes

**Gabe Levin**

10/16/2017 11:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, the city should maintain the current code but provide staff to help expedite resident homeowners' efforts to build their own ADU or DADU under today's code. That would encourage resident ownership which is the revision's stated intent.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jo Ann Brockway**

10/16/2017 12:00

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) Impact on the tree canopy in Seattle and, by extension, impact on the natural removal of air pollution, as well as aesthetics. I would like to see regulations that discourage cutting down trees in order to put in an ADU or DADU. 2) I believe eliminating the requirement for own occupation while adding the number of individuals housed on a lot is a recipe for conflict, noise and disorder. When the owner does not live in the neighborhood, he/she has less incentive to mitigate problems with the property, and renters have less incentive to be good neighbors. 3) Parking is already a problem in my neighborhood. There should either be a requirement for some proportion of off-street parking per some number of units or persons living on a property or a proportional increase in public transportation to neighborhoods based on increases in ADUs or DADUs.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Richard Ta**

10/16/2017 15:33

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I think it's great that the city is considering changing existing rules to make it easier to build a DADU. Regarding the 13 issues being studied:

Issue 1: I think a house should be allowed to have both an ADU and a DADU if these units conform to city requirements.

Issue 2: I believe the off-street parking requirement should be kept. Several Seattle neighborhoods - Capitol Hill, Eastlake and Ballard immediately come to mind - are becoming increasingly difficult for homeowners to find parking for their cars. I moved out of Eastlake mainly because the parking situation had gotten so awful. With land at a premium, many parking lots are being turned into residential or commercial buildings.

3: No change. Without the owner occupant requirement, there is the potential for "3-plex" investment properties all over the city, which will negatively transform the neighborhoods.

4: Reduce requirement to 3200 square feet. The DADU will still need to conform to other lot coverage requirements.

5: Alternative 2. The square footage of the DADUs should be increased to match the 1000 feet allowed for an ADU. The city should also give owners incentive to build a DADU AND provide off-street parking for the DADU by exempting parking and storage structures.

6: Alternative 2. I think height should be allowed to go up even further than the proposed 1-3 feet. For smaller lots with less usable lot coverage, the ability to build a usable 2 story DADU, if desired, would provide a quality living experience, vs. just a backyard studio for AirBnB-like purposes. Given the great amount of equity that most Seattle homeowners have gained in a short period of time, many owners can benefit from being able to build larger properties.

8 & 9: Alternative 2.

Thank you for considering my input.

Regards,

Richard

## Daria Sawochka

10/16/2017 19:01

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am opposed to dropping the owner occupancy requirement! What is wrong with having simple neighborhoods with space between homes?

### **Do you have other comments or suggestions related to the scope of the EIS?**

Too many people in other neighborhood no longer see the sun if a tall tube building is to their south. Plus, with population getting older, at some point, no one will live in homes with stairs up to the kitchen, then more stairs to bedrooms. It is not a family friendly design either. Stop the madness.

## Anne Morrison

10/16/2017 19:32

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

strongly opposed 30 yr Seattle resident. A single working mother, I saved for years to be able to buy my starter house, still here. 3 rentals on SF city lots with no owner accountable living there? You're putting triplex equival. w/ no parking requirement, in my neighborhood (Haller Lake) there are no sidewalks to walk to non-existing transit, cars will be swamping us. People who move to outer SF Seattle will have cars. Quiet streets here, know our neighbors, you're wrecking one of the few good things left about living in Seattle.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Three NEW plexes on a SF lot in Seattle will NOT be cheap rentals. Anything new now cost more than what it replaces, and here, times three. Please leave us as we are! There are plenty of multiple-zoned areas around not filled to capacity, I see them all the time. I know the developers can't wait to swarm SF neighborhoods; for once, please come down on the taxpayers side and demand a little more from developers, who have really been getting a pretty good deal the last few years.

## Sandra Whiting

10/17/2017 10:54

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

impacts of added impervious surface on generation and management of stormwater

### **Do you have other comments or suggestions related to the scope of the EIS?**

agree that loss of tree canopy is important to consider in EIS

## Andrew Fessel

10/17/2017 12:53

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Re: ADU EIS - Comments from Queen Anne Home/Property Owner - newly retired - planning to remodel a home just purchased and also add a DADU in order to create living accommodations for our daughter and son-in-law's family - and for my wife and I to provide nearby childcare.

Summary: in Support of Alternative #2 - with additional request that 35% lot coverage limit should be raised to 45%. Most important - current allotment of 800 sf does NOT allow for a DADU that contains living/occupancy basic and minimum needs of kitchen - living area - dining area - and two (small) bedrooms. 1000 sf would allow the minimal house components which 800 SF does not. This is an essential DADU regulation change.

Dear Aly: As a property owner of 2815 11th Ave. West in Seattle - I would like to offer my comments in support of the proposal to modify the rules that regulate when and where a property owner can create an ADU. I am a new Seattle homeowner and just commencing the renovation of an existing property and the addition of a DADU in West Queen Anne. Based upon my planning and preparations for this project over the past year - I would like to share my experience and recommendations with rationale for why the changes defined in Alternative #2 are essential for Seattle to adopt. Please see my detailed comments below:

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. A single family lot should be able to have an AADU and a DADU. We have a 1000 sf unfinished basement (including garage) that could be modified into an AADU, in addition to the DADU that we plan to place on the lot. We would use this 3rd living unit for another family group - either my older daughter and her husband, or our grandchildren to live when they are grown.
2. No off-street parking should be required. The streets (11th Ave. W. in front of our property - and 12th Ave. W. on back of our property) both have open unused parking space to allow for street parking of our multiple vehicles. We should be allowed to park on the street as many of our neighbors do - who either don't have garages or do not use those they have. I would prefer to allocate my property to gardens and play areas for our grandchildren, instead of parking spaces that will not be used.
3. No owner occupancy should be required for the house, AADU or DADU. As the property owner - if I decide to move (as my age and physical condition might require) to another location in or outside of Seattle - there is no reason why other members of my family should not be able to remain on my property. Or the then available AADU or DADU could be rented to provide some return for my investment in the property in order to pay for my necessary alternative living requirements. My property should be mine to occupy or not - as I see fit.
4. 3,200 square feet should be the minimum for DADU construction. I had to search the Seattle market for 15 months in order to find a property of the size (5300 sf) where a DADU could be easily added (house placed forward - access to street on back side of property). My large property size required a substantial portion of my project budget, leaving me fewer funds to create the style of living quarters that I desire and that will match the neighborhood. Being able to purchase and install a DADU on a smaller property would allow me to use my funds for renovation and construction instead of the expense purchasing large plots of land - very expensive in Seattle.
5. MOST IMPORTANT - the current limit of 800 sf is NOT BIG ENOUGH to allow for appropriate and necessary living space. The current limit of 800 SF means that either you cannot have a dining area, or a living area, or a kitchen sized for actual use - or that you only have one sleeping room. Sit down with an architect and sketch it out yourself. I have looked at dozens of DADU plans. None of them allow the 800 sf house to contain the essential spaces. If I could just have 200 more square feet up to the 1000 proposed - I could design and construct a house of the size to allow me the comfort and quality of life I deserve - and live on an equal basis with all other city land-

owners.

6. Height limits on DADUs should be higher than existing limits. The limitation on square footage already restricts the size of the additional unit (be it 800 or increase to 1000 sf). The feeling of being cramped in a small house can be greatly enhanced by building the rooms with higher ceilings. City regulations already limit my footprint - please allow the maximum height limit upwards!
7. 35 percent of lot area coverage for lots over 5000 square feet is unfair in comparison to the lot coverage of many existing properties in our surrounding Queen Anne West neighborhood. Modern living design is now focused on small spaces - small gardens and patios, with doors opening onto decks and gardens to allow indoor-outdoor living. I should not be required to limit by building coverage to just one-third of my lot. I paid over \$100 per square foot for just for my property value. I should be able to build on up to nearly one-half of that! Lot coverage should be allowed up to the level of 45% - maintaining a majority of the property as not covered by building structures instead of the current two-thirds requirement.
8. Up to 60 percent of the rear yard should be allowed covered by a DADU (and other structures) if the DADU is only one story. I will occupy my DADU as an older adult, at an age where stairs impose a substantial and growing challenge. Requiring my DADU to be two-story in order to adhere to lot coverage limitations imposes a physical and quality of life challenge upon me - such that I will not be able to access or utilize a substantial portion of my DADU structure located up a stairway. DADU regulations should be structured for DADUs with an understanding of the age and lifestyle of their very likely type of residents - older adults who cannot use stairs.
9. DADU entrance should be allowed on any façade. Fitting a DADU into an existing property while protecting the privacy and usage functions of all other adjacent domiciles is very challenging. Allowing for design flexibility as to where the front door is will also allow a great improvement in the location of interior rooms, best use of space, and design for quality of life within the DADU unit while also protecting the usage of surrounding structures.
10. DADU height limit exceptions should be allowed to allow for maximum interior space. The only relief from a small DADU footprint (limitations in the total of two dimensions) is to allow for the maximum possible in the remaining third dimension. Seattle should do everything possible to aid the quality of life for the DADU residents it is requiring to living in the small box footprint by allowing higher ceiling heights and the impact of light that upper windows can deliver.
11. Occupancy for a property with DADU and AADU should be allowed up to 12 persons. A DADU and an AADU should be able to hold 3 persons comfortably (two small bedrooms in each). The existing house (with 4 bedrooms) could hold another 5 or 6 persons. Twelve is an appropriate occupancy limit for this housing.
12. & 13. MHA and RRIO requirements as proposed seem appropriate.

Please let me know if I can offer any other information or perspectives to help you in your decision making.

Best regards,

Andrew Fessel

Property Owner - 2815 11th Ave. W, Seattle WA. 98119

## Max Hensley

10/17/2017 15:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

In addition to the items listed as part of Alternatives 1 & 2, consider the permitting and sewer access fees required for development of DADUs. Those fees can easily reach into the 5 figures and are a substantial additional barrier to development of new affordable housing units.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The EIS should consider as a comparison the common practice of purchasing a smaller/older home, knocking it down, and building a substantially more expensive single family home. In this real estate market, that is a more likely alternative when development of ADUs/DADUs is discouraged or barred than no action at all.

## Kelly Glenn

10/17/2017 15:43

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

potential to provide the type of housing most lacking (e.g. studios, 3 BRs, whatever that is) and to make a dent in the housing shortage, rather than become full-time AirBNBs

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Kristen Petersen-Motan

10/17/2017 15:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

The minimum lot size should definitely be relaxed. I live on a 3,000 square foot lot, but I still have a pretty large yard. I would love to be able to have the option to provide affordable housing for my community!

## Tom Lang

10/17/2017 16:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Limits on how the ADU/DADU can be rented? If there is a possibility these additional ADUs/DADUs will be short-term rentals (like Airbnb), the proposed changes will not increase affordability in the city.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I fully support the Alternative 2 proposed changes. Please increase density in this city - for the sake of affordability, equity, and justice.

## Shalini Nilakantan

10/17/2017 17:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am extremely concerned about turning quiet single family neighborhoods into congested spaces.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Let's not destroy the clean communities and neighborhoods we have built with single family homes. This brings together families and gives more spaces for children to play safely. Less congestion and less cars on the roads in our neighborhoods. The more families you cram into smaller spaces the more than it takes away from the quiet and peacefulness we have right now and don't want to lose.

## Sarah Shifley

10/17/2017 20:02

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should take into consideration broader parking reforms to incentivize use of transit instead of individual car ownership. Seattle must move away from fossil fuel transportation and more and more Seattle residents are realizing this and living without cars. City-wide parking reforms could off-set any concern regarding reduced availability of parking or additional car traffic in residential areas. For instance, the city could make all parking in the city either zoned or metered, increase the cost of parking permits and meters, and use the revenue from parking to maintain bus and bike infrastructure. The amount of permits in residential areas could also be limited. If neighborhoods are concerned about losing green space, the city could also put into place requirements for trees in the green strips along sidewalks.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The EIS should consider reducing the minimum lot size to allow ADUs and DADUs on smaller lots. The EIS should also consider increasing the amount of allowed rear yard coverage if doing so would facilitate construction of more ADUs and DADUs.

## Kathleen Brennan

10/17/2017 21:38

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Credits for remediation of additional CSO runoff due to building ADU/DADUs, e.g., rain gardens/cisterns.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I approve of Alternative 2 for all points except for #3 (Owner Occupancy). In order to prevent excessive involvement by predatory developers, retain the owner occupancy requirement for at least 6 months out of the first 2 years. Allow the maximum square footage to be up to 1000 excluding garage and storage areas.

## Karen Schmidt

10/18/2017 5:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow RV living as a DADU. Including RVs and Tiny Houses built to RV standards. Require water, sewer, and electrical hook-ups.

Allow DADUs to be on the side of the existing property (driveway). Or in the back.

Review and revise land use, parking, and DOT rules. (My understanding is that on an arterial it is currently not permitted to park a large RV in the driveway as moving it interferes with traffic. Suggest revising to restricting movement to non-peak hours such as 10am-3pm, and 6pm-6am.)

**Do you have other comments or suggestions related to the scope of the EIS?**

DOT traffic laws regarding large vehicles

Off street parking requirements for large vehicles

**Jon Krombein**

10/18/2017 9:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see the EIS specifically address how any changes to the current rules will affect existing single-family neighborhoods. I would like a clear commitment from the EIS that traditionally single-family neighborhoods are important to the character of the city and need to be maintained.

**David Ogden**

10/18/2017 9:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Garbage and sewer: if more people will be dwelling on the same size lot then it needs to increase and pay for additional garbage and sewer.

**Do you have other comments or suggestions related to the scope of the EIS?**

Remove the ability to have both an ADU and DADU.

**Brian Rulifson**

10/18/2017 10:00

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impacts to Tree cover quantity and quality in 10 year expectations for the expected lifetime of the individual projects, Impacts of Rainwater soil infiltration both to the environment (aquifer recharge, etc) and nearby dwellings (basement wetting), Impacts to solar access especially for installed Photovoltaic and other solar capture technology investments, DADU-related Fence building and the impacts thereof, Long-term impacts of ADU/DADU building near Urban Villages on the ability to expand Urban Village boundaries with meaningful associated densification.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'd like to know the economic impacts of the proposed changes to each councilmember. It would be great to know this would affect their individual property holdings.

**Kay Kirkpatrick**

10/18/2017 11:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

As a resident of a lower income, diverse neighborhood with smaller size homes on SF lots, I am concerned that this "starter" level type home will now become the target of "developer" type purchasers with the goal of really just creating small multi-family rental properties. This is certainly going to be the result of you remove the owner occupancy requirement. In fact it is already happening "under the table" on my street.

As the owner/creator of a DADU I wonder if this occupancy requirement will now also apply to me? Or am I still bound by the legal document I signed?

This subtle change will significantly increase neighborhood density and demand on drainage infrastructure, as well as traffic loads, disguised as a "cottage" type project. We are really asking if we can triple density citywide. This should be made very clear to the public, who don't really understand this. So the EIS needs to ask what is the impact to our infrastructure, urban canopy, and traffic if we triple our housing density.

A developer on my block who recently removed a small rental house of 500 sf and replaced with 5 huge homes - had to do quite a bit of runoff mitigation (water holding areas etc) as a result. By adding the ADU and DADU to the existing property, wouldn't we need to add similar requirements to those creating these?

**Leslie McClure**

10/18/2017 12:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

If Amazon becomes unhappy with Seattle and makes their 2nd headquarters their main location, like Boeing did, we will have packed 3 homes per lot onto each property for no reason and many will become derelict with no owner on the property.

Don't be short-sighted. Are you being reactionary instead of considering all possible future circumstances? Two homes per lot is reasonable. Crowding in three homes per lot will lose us a lot of trees and put up ugly housing in a hurry to house what may not be sustainable numbers of people living here in the future!

**Do you have other comments or suggestions related to the scope of the EIS?**

Light rail is years away for many Seattle neighborhoods, so those who can't walk to the stores and carry purchases back must use cars and must have parking spaces. To continue building without parking and changing current parking into buildings (like the low income housing at 132nd & Greenwood, which will take away 80 parking places and won't even put one per unit in the building.) is the opposite of what you're doing with mother-in-laws. Not considering parking is thinking of the future without considering the present. Both present and future must be considered!

## Patricia C. Hedtke

10/18/2017 13:23

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

limits to what areas this change would apply to

### **Do you have other comments or suggestions related to the scope of the EIS?**

3 living arrangements on a single family property is too much 2 perhaps if there is no subsidence in the area. Most areas between Greenwood, 85th, 1ave and 100th are an old wetland a Bog that suffers from crowned streets, broken sewers and subsidence. Putting denser housing in that area is shortsighted and dangerous.

## Marvin Jared Lemmon

10/18/2017 13:34

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No additional topics.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The removal of the existing off-street parking and owner-occupancy requirements should not be wholly vacated.

From my observations, Seattle is far behind in public transit to consider a complete vacation of the off-street parking requirement in areas of high density and narrow streets; especially in mixed uses areas with retail. The EIS should continue to include and consider this requirement in determinations of whether a new ADU would improve or diminish the health of an area by pushing vehicles into the street for parking. What that means I do not know, yet I left a neighborhood because there was density increase from up-zone so cars were pushed to streets when units were occupied. This had a visible effect of occupants parking on the street, limiting available parking. If the EIS looks at what impact this outcome has for current traffic flow, pedestrian safety, and retail impact then it should not be removed.

Unfortunately, I can only speculate on the owner-occupant vacation. And that this removal could generate absentee landlords for properties and from what is shared about absentee landlords taking over such plots to accomplish more density has not been all positive according to Seattle Growth Podcast. Indicating such situations diminish community and should be reserved for apartment complexes and not ADU properties. So would prefer to have the requirement not vacated.

## Jacob Lee

10/18/2017 13:44

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning.

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental road-block about what residential areas are for: people.

2. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
5. Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
6. Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
9. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
10. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

**Scott L Miller**

10/18/2017 14:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm highly in favor of allowing ADUs and DADUs per the scope previously approved by the Seattle City Council and subsequently appealed by the QA Community Council. A cost effective, easily implemented way to increase density within existing single family zones with sensible controls helping to reduce overall energy and carbon use, increasing the number of living units closer to workspaces and transit. Win, win, win. NIMBYs may have the louder voices but this is just common sense legislating at it's best. Strongly supportive and bringing this up with every other Seattle voter in our large circle of local friends.

**Kevin Van Meter**

10/18/2017 14:29

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Are ADUs that are potentially mobile (e.g. a tiny home on a trailer bed) accommodated in this proposal?

**Do you have other comments or suggestions related to the scope of the EIS?**

Thank you for working to increase Seattle's support of ADUs in Seattle.

**Kevin Van Meter**

10/18/2017 14:30

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Are potentially mobile ADUs accommodated in this Alternative (e.g. tiny homes on trailers).

**Do you have other comments or suggestions related to the scope of the EIS?**

Thank you for working to increase the opportunity for people to introduce ADUs to Seattle.

**Eric Cobb**

10/18/2017 14:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

**nicholas crosser**

10/18/2017 14:41

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

owner occupancy requirement - please remove

**Do you have other comments or suggestions related to the scope of the EIS?**

I currently live and work in the City of Seattle and was born and raised in Seattle. I have built a DADU and frankly it is the only thing that has allowed me to continue to be able to afford to live in this city as it has helped tremendously pay for the increase expenses of living in this city. I am extremely worried the current law of limiting homeowners to having to live on the property is too restrictive and out-right illegal. If my current employer had me transferred to another location there is no way I could afford to keep my house here in Seattle due to the own-

er occupancy requirement. I understand there is an ideology of an onsite homeowner making a better landlord however there are no facts to back this up. The focus should instead be on having better regulations for landlords and tenants in general without illegally limiting the property rights of the landlord. We are the ones helping fight urban sprawl by creating increased affordable housing in this city but by keeping the owner occupancy requirement along with the other restrictions of building an DADU the risk for the homeowner is just too great. There must be a better common sense approach otherwise the DADU's will just not get built and instead you will have larger McMansions being built in our neighborhoods for the rich as these will be the only folks that will end up being able to afford to live in Seattle.

## Jake Antles

10/18/2017 14:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I support the draft scope of the EIS and additionally would like to comment that I am VERY supportive of raising the Household Size Limits.

## Chris

10/18/2017 14:53

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. I very much understand why there is a huge push to create more housing in Seattle; it's simple economics... supply & demand. By creating more housing, supply increases and costs should reduce once supply hits critical quantity. I agree that this is the best idea to solve that simple model.

I also feel, however, that this initiative affects the demand side of the equation in a bad way, and possible effects of making ADU's more accessible will have a negative effect on our communities and long-term desirability of our housing. By allowing ADU's, micro-housing, low-quality/high-capacity housing, and other means designed to curb costs into single-family residential areas, the quality of life for existing residents diminishes, urbanization and increased density occurs in undesirable locations, and the city becomes increasingly inefficient.

In my opinion, current and recent elected officials have made decisions as leaders, and not representatives. As such, I do not feel that the current scope adequately studies the impacts to current residents.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Yes. Our city and surrounding neighborhoods are filled with cranes. It is clear that the city is experiencing growth beyond expectations formulated years ago.

One trick that developers and consultants like to employ is to evaluate the impacts of new development in contrast with existing current conditions or conditions at the time of a study of interest (e.g., per Consultant Study (2006)). These conditions are not applicable.

Rather than evaluate vs. current or historical data, please consider reasonable trends. West Seattle - the neighborhood I live in - has changed in character. From what I know, it has grown nicer with time, especially as the City of Seattle grows south and urban centers populate & appreciate in value. Meanwhile, our architectural reviews,

traffic studies, and other means of evaluating building permits (and in this case the EIS) hold new construction to archaic standards (e.g., low-quality building finishes, low-quality architecture, no traffic, lots of available street parking) that no longer apply. Please project using reasonable logic.

## Ryan Donahue

10/18/2017 14:54

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary.

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Wendy Heipt

10/18/2017 14:57

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

PARKING. PUBLIC TRANSPORTATION. EFFECT ON UTILITIES.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Can we keep single family neighborhoods (such as Madrona) single family? At least until you figure out infrastructure? Otherwise you're just piling people into neighborhoods that have no bandwidth to accept them.

## Sean Cassidy

10/18/2017 14:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Building height restrictions being removed

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Paul Nathan

10/18/2017 15:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Projected population in Seattle in 2035. We must build sufficient housing to ensure that all members of society can live in Seattle by that point. This is a key part of the scope: forcing the majority of the population to live outside of Seattle and commute in is a poor use of Seattle's resources and causes critical pressure on transit systems, interpersonal systems, and increases inequality within Seattle and the region.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 is a good start: please remove or significantly increase the limit to the number of unrelated people who can live on the lot. Please also allow 1-4 more stories on the new development.

## Kara

10/18/2017 15:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impacts to adjacent properties related to set back variances allowed because of existing structures

**Do you have other comments or suggestions related to the scope of the EIS?**

I am VERY supportive of ADUs, and plan to eventually build one ourselves in our SF zone in west seattle. Several of our neighbors have one, including our adjacent neighbor, who is building one right now. Because they have retained two existing walls of an old garage, they are not required to follow set back requirements. This concerns us, as we have had long-standing drainage issues that stem from that structure and we are worried they will re-appear and worsen with the new ADU structure. At no point have our neighbors alerted us that they were constructing the ADU (i believe the city should have required this, as it has a direct impact on our property in many ways beyond drainage, and I have heard of others complaining of similar situations). Please ensure that regulations address impacts to adjacent properties associated with "grandfathered in" structures. I would hate to see ADUs get a black eye because of their impact to neighboring properties. I very much support adding density to SF zones in ways that are as unobstrusive as possible and believe many others do as well, as long as it does not impact their property in negative ways.

**Garth Vander Houwen**

10/18/2017 15:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Reduce the power of NIMBY homeowners to match their population, not financial clout.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Mark Nelson**

10/18/2017 15:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Only Alternative 2 options that should be considered are: 5 and 9. Otherwise all of Alternative 1 (current laws) should be kept.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Scott Clawson**

10/18/2017 15:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am a property owner who is in favor of the changes and wanted to voice that here. please let me know if I should send this somewhere else

**Do you have other comments or suggestions related to the scope of the EIS?**

**A.J. Skurdal**

10/18/2017 15:44

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

The EIS should most certainly address the social and other neighborhood impacts of removing the owner-occupancy requirement for ADUs.

**Gabriel Avila-Mooney**

10/18/2017 16:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

none

**Do you have other comments or suggestions related to the scope of the EIS?**

I support Alternative 2. This may allow many people living in Seattle the ability to remain in their home as property taxes and expenses sky rocket due to gentrification and increased costs of living. Having an additional dwelling unit to rent for supplemental income will allow struggling families the ability to lessen the financial stress of living in a steadily less affordable region, which in turn will keep workers in the area. I don't see any down-sides to this.

**Cynthia Etter**

10/18/2017 16:26

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Would it be possible to establish some sort of rent cap so these ADUs don't just become a cash cow for the owners?

**Do you have other comments or suggestions related to the scope of the EIS?**

**Ellen Sollod**

10/18/2017 16:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

How do these changes effect the urban character of the neighborhood?

**Do you have other comments or suggestions related to the scope of the EIS?**

How can the City develop standards that encourage retention of the historic urban fabric while increasing density.

**Val Sporleder**

10/18/2017 17:03

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Property Taxes; There was no mention of taxes in the presentation and I wonder how those will be affected. Are home owners rates suddenly increased when a DADU is added to the property because they have 'improved' their land? Does the assessed value go up for the land AND the structures on it? How does this work and will people contemplating a DADU know what their taxes will be ahead of time or at least how they will be assessed so they can estimate and plan accordingly.

Zoning; If you are adding ADU and DADU to a property it really is no longer 'Single Family'. The SF zoning doesn't just refer to the physical structure but also implies certain amenities. More open space (yard, parking strip), parking (on and off street), less transient neighbors (owners rather than renters) which tend to be more thoughtful in construction and maintenance. I believe this needs to be looked out. This goes back to Owner Occupancy requirement. I believe this is a MUST to keep the expectations people have for a SF Zone. And to keep things "neighborly".

Not Market Rate Housing: Keep in mind how these potential 'Rentals' will be different than others. Because of the close quarters, owners are more likely to rent to family and friends and therefore charge differently. Or not rent out at all. Will they be able to do this or will law require them to rent as a landlord and follow those requirements? If they are renting out as an Airbnb that's a lot higher rate than grandma (one would hope). And does any of this matter? Building more DADU's does not guarantee added lower income housing.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Many of the barriers to DADU construction are cost related and the uncertainty of how they will be regulated. I also, don't think inviting developers into a SF zone is a good idea at all. They are NOT stakeholders in the neighborhood and no amount of regulation can force them into this role. Owner occupancy should remain! I like ADU and DADU and think more should be built. Everyone in my neighborhood has done a great job! However there are definite concerns. Like adding them with no parking requirement when we have no reliable public transient system is a difficult one for me as well. I've lived in neighborhoods where parking was a competitive sport and even without ADU and DADU's it is becoming a problem.

## **David Moehring**

10/18/2017 17:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

(A) Impact to Schools when the number in a household increase from 4 up to 12 persons. (B) The calculated capacity of sanitary and power existing verses what would be required to increase from 4 up to 12 persons across over 60% of the Seattle Land mass within the next 20 to 30 years. What infrastructure projects and anticipated escalated costs should the city be prepared for, and how the burden for these costs might be relieved. (C) Specific 20 year time period in with the 75 / 80 subdivision rule must not be changed; and / or making a 20-year time period in which residential lots may not be subdivided (for the purposes of making one parent lot into two development lots). (D) tree canopy impact must be included in the EIS - as 60% of Seattle's tree canopy is on SF zoned properties. A tree needs an approximate area of 30 feet by 30 feet to mature. (E) The proposed 3 dwellings per minimum 3,200 square foot lot equates to a density as high as 1 dwelling per every 1,066 square feet of lot area. This would put residential lots more dense the lowrise zoned lots that have an allowable density of 1 dwelling per 2,200 square feet of lot area. Accordingly, the EIS should separately examine other minimum lot sizes for 1 ADU; and the EIS should examine the minimum lot size for the proposed 1 ADU with 1 DADU. Particularly, proportionate to LR1 zones, the minimum lot size for a SF lot with just 1 ADU could be as low as 4,400 SF to match LR1. Similarly, the minimum lot size for a SF zoned lot with 1 ADU and 1 DADU should be no less than 6,600 square feet lot area.\*\* (F) The EIS should evaluate the affect of "Urban Heat Islands" when the amount of green space is significantly reduced on over 50% of the City's existing land area. The proposed maximum area of 1,000 square feet of ADU or DADU is the same as what is being provided in three-story rowhouses in lowrise zones. The spaces between dwellings of this density are paved and not capable of absorbing heat generated in dense areas. (G) The affect of urban heat island effect on wildlife should be quantified in a similar manner to how Seattle protects the Waterfront and Salmon populations.

## Do you have other comments or suggestions related to the scope of the EIS?

Pat

10/18/2017 19:05

### Are there additional topics or concerns that you would like to see addressed in this EIS?

#### Do you have other comments or suggestions related to the scope of the EIS?

Keep at least one parking spot requirement on the books, esp. for those properties being allowed two ADUs. Minimum of a 30 front frontage, and at least a 3000 sq. ft. full depth lot. Minimum 30 foot setback between laneway ADU and main house, and of course a sliding scale of ADU square footage based on lot size.

Ben Mitchell

10/18/2017 19:31

### Are there additional topics or concerns that you would like to see addressed in this EIS?

I think ADUs seem like a great tool to help address the shortage of housing in the city. The policy seems relatively undistruptive to the look and feel of neighborhoods, and I would advocate to look even beyond ADUs and look at more aggressive zoning changes to single family neighborhoods. I.e. allowing for duplexes, triplexes, and stacked flats. Zoning changes to allow for these kinds of homes, particularly in neighborhoods at low risk of displacement, I think are really important.

#### Do you have other comments or suggestions related to the scope of the EIS?

1) Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

2) Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

3) Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

4) Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

5) Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break

on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

6) Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

7) Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Joe Terrenzio

10/18/2017 20:02

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No, not for the EIS though I do have other concerns about ADU implementation.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Yes, particularly the application, inspection, and permitting process for ADUs. There are a significant number of properties and owners who would currently like to implement an ADU/DADU but do not because of the long waits for construction permits, unclear guidelines on what is required (separate heating for example), and potentially high costs for improvements or renovations to existing structures.

## Francine Friend Alexander

10/18/2017 22:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

our land is covered by a covenant that forbids us from having 2 buildings on any lot within our plat; thus, you HAVE to specifically exclude properties covered by Covenants forbidding secondary dwellings from your new land use codes or you will invite lawsuits and I don't want to pay for lawsuits

### **Do you have other comments or suggestions related to the scope of the EIS?**

you are going to create a parking and street access nightmare with this proposal...

## Rich

10/18/2017 23:27

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I'd like to understand the impact of removing the owner-occupancy requirement on (1) local ownership; (2) displacement; (3) housing costs; (4) crime rates; (5) everything else. I expect that this change will invite a ton of out-of-town investment in our housing stock, which will be converted into 3xUnit rentals. The owner-occupancy requirement limits this effect.

I'm not clear on the degree to which owner-occupied ADU sites drives changes in the cost and quality of housing and the surrounding areas, as compared to an influx of non-owner occupied ADU. I would like to learn that from the EIS.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Bonnie Miller**

10/19/2017 8:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Environmental concerns about more impervious surfaces, storm water runoff and loss of canopy.

**Do you have other comments or suggestions related to the scope of the EIS?**

Whether the unit(s) will have safe sidewalks to buses, whether the infrastructure can support additional services such as water and sewer,

**Glenn Herlihy**

10/19/2017 9:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

We built an ADU in 2015. The off street parking requirements dramatically and negatively influenced our design. We live near the light rail station where rental housing is needed very badly and cars are not needed. Please remove off street parking requirements.

Also please abolish owner occupancy requirements. While these may be comfort for rich people in rich neighborhoods they negatively impact under-served communities who desperately need more rental properties.

**Gayle Garman**

10/19/2017 10:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Increased storm-water run-off will be generated by the increased hard-surface areas of roofs and patios associated with increased coverage of lot areas. City storm-water infrastructure is already undersized for the increased intensity of rainfall resulting from a changing climate. At full build-out of the alternatives, what will be the the impact on the magnitude of storm-water run-off and what infrastructure improvements will be needed?

**Do you have other comments or suggestions related to the scope of the EIS?**

Decreased tree canopy in our neighborhoods and the consequent increases in storm-water run-off, ambient temperatures, air pollution, and decreases in wildlife, esp. birds.

**Harold McNelly**

10/19/2017 11:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

We are completely opposed to the proposed zoning changes in single family neighborhoods.

**Do you have other comments or suggestions related to the scope of the EIS?**

One in-law unit would be acceptable, additional cottage unit is unacceptable, including the provision to waive off street parking.

**Scott Brown**

10/19/2017 12:14

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Expanding maximum size of ADU up to 1500 ft<sup>2</sup>, not including a garage for parking, to provide dignity and quality of living such as ability to have visitors or family members in more than one bedroom. This will also make the very large capital investment required to build an ADU a more reasonable investment.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Paul Villa**

10/19/2017 12:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Remove the ordinance that requires a DADU have it's own sewer line from the unit to the street. It's cost prohibitive and unnecessary when one can easily tap into the existing sewer line. It'll allow more people to afford to build a DADU.

**Do you have other comments or suggestions related to the scope of the EIS?**

I prefer alternative #2.

**Curtis Bigelow**

10/19/2017 12:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

required separate sewer connection

**Do you have other comments or suggestions related to the scope of the EIS?**

can setback requirements be reviewed? Smaller seems better.

**Daphne Schneider**

10/19/2017 13:18

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I believe you have covered my concerns and interests.

**Do you have other comments or suggestions related to the scope of the EIS?**

I very much support Alternative 2, and urge you to continue to consider this as one way to provide options for

affordable housing. Taken in that light/seen through that lens, the more options the better. Thank you.

## Laura Villarreal

10/19/2017 13:49

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I support changing regulations to lower barriers to build ADUs. As Seattle grows, it's important to increase density in every neighborhood through a variety of measures - not just through MHA. ADUs reduce the entry barrier for middle income singles, couples, or families who want to live in a certain neighborhood, increase density without changing the culture of a neighborhood, and are a sustainable way for residents of a neighborhood to "age in place." I currently live in the Wallingford neighborhood.

## Mark Spitzer

10/19/2017 15:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

There is a reasonable 'third way' that incorporates features from both Alternative 1 (No Action) and Alternative 2. I think that something along these lines should be included.

## Donna DeShazo

10/19/2017 17:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I object to every one of the proposed changes. Our single-family residential neighborhoods are already too crowded with inadequate parking facilities for today's multiple vehicles per household; new housing is already exceeding average heights of the neighborhoods to the detriment of "open spaces," and removing owner-resident requirements simply turns single-family residential neighborhoods into multiple-resident/apartment house density...to no one's lifestyle improvement!

## Josh Hirschland

10/19/2017 23:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

While this seems like a good first step, I would like to have greater consideration given to upzoning single-family zoned areas, particularly including those located near bus lines, bike lanes, and current and future light rail stops.

**Do you have other comments or suggestions related to the scope of the EIS?**

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Allow larger DADUs, particularly on larger lots (e.g. those over 4000 SF)

Make parking requirements for additional units voluntary

Lighten restrictions on renting DADUs, both for short- and long-term leases

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings.

## Jennifer Beetem

10/20/2017 1:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think the public would benefit if there is a financial incentive for owners when Accessory Dwelling Units are rented on 9 month+ leases. For example: a small reduction of property tax for the creation of a lease-able unit of housing; a bonus property tax reduction for creation of a unit of affordable housing. Without an incentive, it may be substantially more lucrative for owners to vacation rental (AirBnB) their ADUs to visitors than to rent these units to Seattle residents. There is a serious shortage of apartments available for lease in Seattle that working people can afford and more ADUs can have a more positive impact on this population if the City evens the playing field with vacation rentals. The City should support a healthy mix of leased residential and short-term/vacation rental use of ADUs.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am glad loss of vegetation is on the radar. Is the city able to offset tree loss from construction of ADUs under the expanded rules by planting trees on public land elsewhere?

## Zach Lunden

10/20/2017 7:45

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the city to review required setbacks (especially in low-rise zones. Land is in scarce supply and we need to utilize this resource more efficiently by reducing or eliminating setbacks in our urban areas and increasing density.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Remove parking requirements and allow multiple ADUs and DADUs and remove the owner occupancy requirement.

## Denise Dennis

10/20/2017 9:01

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Please remove the off-street parking requirement, especially in neighborhoods with Light Rail stations. The off-street parking requirement makes it difficult to build a DADU when the house does not have alley access.

Also, please remove the requirement for the homeowner residency. This requirement reduces the value of the DADU.

## Zach Emmingham

10/20/2017 11:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

no.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the proposed removal of barriers to the construction of ADU's. In particular, I support the proposal to allow slightly larger backyard cottages, which will make them more viable as living spaces.

## Maxx Follis-Goodkind

10/20/2017 14:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

It would be great to somehow prioritize approval for ADU that was set aside as affordable housing for a designated period. My biggest concern is that units will get converted to Air BNB and have little impact on the need for additional housing.

**Do you have other comments or suggestions related to the scope of the EIS?**

The parking requirement seems silly considering how many people in Seattle, me included, that choose not to drive or have only one car for a family. If there is a major bus route within 1/4 mile of a residence then parking requirements seem unnecessary.

## Sofia Soto

10/20/2017 16:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock

about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

## Emily Johnston

10/20/2017 17:04

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

2. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. 3. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

4. Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand

alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

5. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

6. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

7, Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## marjorie rhodes

10/20/2017 22:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

If Seattle does not protect its single family neighborhoods (neighborhoods with only one dwelling per lot) then Seattle will never again be a livable city. There is a hideous house squeezed in between 2 other houses located about two blocks north of Roosevelt High School, west side of street. It should never have been allowed. It is an example of just how ugly Seattle is becoming. I am from here and Seattle used to be a beautiful city. Any rezones or redevelopment should only be allowed in the downtown area. Don't damage the rest of the city.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Beda Herbison

10/21/2017 8:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I'm in favor of this proposal

## Susan Francis

10/21/2017 11:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Holding us to the lot coverage standards of 35% appears to be a stricter standard than what has been allowed in the neighboring homes. Our home is a smaller, older home in Upper Queen Anne. Many of the homes around us are very substantial, have significantly more lot coverage than 35%, and their footprint does not seem to be an impediment to major remodeling projects. The lot coverage standard of 35% pushes the secondary unit into a two story building. This is at variance with our needs for a single floor plate home to age in place.

My daughter and her husband can not currently afford to buy a home in Seattle, but they would like to stay in the city. They both work professional jobs, but the expense of housing is forcing many younger people to the suburbs. They then have to commute into Seattle for their jobs which increases traffic congestion in Seattle and takes time away from their family.

### **Do you have other comments or suggestions related to the scope of the EIS?**

We support amendments to the planning code/zoning ordinance which encourages the production of secondary units in single family districts. As we envision our project, the existing unremodeled primary residence would be brought up to contemporary standards for our daughter and her family to live, and my husband and I would live in a DADU constructed on the rear portion of our parcel.

1. Parking: Off street parking solutions are difficult to understand. Planning counter staff have said that because of concerns regarding drainage, no non-permeable surfaces are allowed. However, they said there were no treatments allowed. We are supportive of installing permeable surface such as concrete pavers which allow water to sink into the ground. This is not a standard that adjacent homes are held to; we have seen neighbors install concrete which is not permeable when they do a remodel. Also, there is plenty of on street parking in our area.
2. Owner Occupancy: The current legislation seems unworkable in the extreme relative to a covenant for lifetime owner occupancy. My home is in a living trust and I don't want my children to have to sell the property and lose their housing security because I am gone. I have seen other jurisdictions which require owner occupancy for one year which seems reasonable.
3. Maximum square footage: The current maximum square footage does not net out enough space for easy paths of travel, mechanical and garage space, and our love of cooking, entertaining with family, privacy, and hobbies. The current legislation does not seem responsive to the needs of a senior citizen.
4. Lot coverage limit: 35% is not a reasonable standard. We should be able to build a single or two story unit in the back yard - this would not impact the surrounding neighbors in a negative way as most of the homes in the surrounding area are large and occupied by only 2 people.
5. Transportation: My husband prefers to take public transit. In our neighborhood, the buses are mostly empty so there is plenty of capacity.

In conclusion, please allow the lessening of restrictions for DADUs and AADUs. This would provide more diversity in Seattle residential neighborhoods and allow both young and old to live together on the same property.

## Joseph Herrin

10/21/2017 15:15

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

quality of design, quality of construction, sustainability, financing, maintaining the primarily owner-occupied character of seattle's residential neighborhoods

**Do you have other comments or suggestions related to the scope of the EIS?**

I have several comments to make regarding ADU/DADU zoning:

1. Do NOT allow DADU and ADU on the same property (2 vs. 3 residential units per lot). This reduces impacts to immediate neighbors
2. Owner MUST live on the property. If the property is sold, new owner must live on the property. In my view, what makes SF neighborhoods unique is that the folks that own the property also live there. A sense of ownership is a critical ingredient in promoting a strong sense of community. Adding density within SF zones, while maintaining a primarily owner/resident status, would seem the best approach.
3. I'm OK with no additional parking requirement, but in neighborhoods with serious parking issues there might need to be an accommodation of some kind
4. Do not allow DADUs to be built for use as short term rentals (ie AIR BnB) - only for long term rentals. Increasing density only to serve short term rentals does nothing to help the housing crisis.
5. Incentives should be built into the code that encourage sustainable construction and high quality design. Land Use has reached out to the AIA about developing a program where pre-designed, pre-permitted drawing sets can be made available for public use. While that scares me a bit, if it helps get better buildings built I might be able to get behind it. Other ideas include reduced permit fees and expedited review in exchange for meeting certain sustainability metrics and some type of incentive to participate in a voluntary design review process.
6. The City should consider financing incentives for homeowners to help make the cost of constructing a DADU 'pencil' financially. Current construction costs are such that the payback period is decades in length. For example, I was recently told of a financing package AirBnB offers where they lend money to create a rental opportunity then take a cut of the rental proceeds until paid back. Perhaps the city could use HALA development fees to finance this type of arrangement, leveraging those dollars to go further over time.

**Nicholas Efthimiadis**

10/21/2017 16:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on

lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay.

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Bill Baumann

10/21/2017 18:17

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

This is a real way to increase low-cost housing problems in Seattle. So far city politics has blamed landlords but done nothing create real options. I strongly support alternative 2.

### **Do you have other comments or suggestions related to the scope of the EIS?**

If restrictions are to be place on alternative 2, I feel it would be very reasonable to have two tiers; small landlords

(5-10 homes) and large landlords. Small landlords must hold themselves to a higher standard due to higher risk. City laws have increased this risk greatly. As such small landlords should be given greater freedoms to remain viable.

## Cheryl

10/22/2017 7:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I support the proposed ADU changes. However, I would like to see the # of Adults living in the primary residence and ADU limited to 4 total and 3 parking spaces min, so we don't run into boarding house situations like San Francisco faces which impacts street parking

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Chane Clark

10/22/2017 8:31

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I have not seen any reason the Seattle City Council has to change the existing zoning regulations in Seattle. Where is the EIS for our existing regulations?

### **Do you have other comments or suggestions related to the scope of the EIS?**

The scope of the EIS should include zoning as it exists today.

## Ellen Archibald

10/22/2017 19:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I would not like parking to ever be attached to development. We are moving toward a society with less reliance on cars. Lets think for the future, not the past.

## Danielle Gaarder

10/22/2017 20:04

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see this city continuing to move toward a public transport oriented future. As density increases, we should be DISCOURAGING personal vehicle use, not orienting our development plans around it. Tying development to parking is a bad decision that will negatively effect all residents of this city, even the ones wealthy enough to afford to live here AND own a vehicle.

## Daniel Worthington

10/22/2017 20:05

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I don't think there should be a parking space requirement for new development. Parking is not as important as affordable housing. Many Seattle residents are choosing not to have cars anyway. This is a climate justice issue in addition to a housing affordability issue. People who are priced out of living in the city are likely to move somewhere less dense where they will drive more.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Caitlin Morrison

10/22/2017 20:10

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

ADUs are an important way forward for Seattle's development. Requiring ADUs to have assigned parking spots is NOT the way forward. Requiring parking limits the amount of space for development and will promote the use of cars/increase traffic. Please please please consider the detrimental effects of requiring parking for new units for ADUs. It would actually be amazing if we could somehow reward and incentivize people to NOT need a parking spot.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The EIS needs to really look at the environmental impacts of requiring parking for the whole city, not just for the immediate environment.

## Claire Ireland

10/22/2017 20:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I think it is very important that we not require off street parking spots for ADU's. Seattle residents are moving away from relying on cars and requiring parking spots will only restrict the new housing development that we desperately need. I also think its important to do away with the restrictions in single family zones. Several years ago I was evicted from this type of cottage because my landlord was not straightforward with the zoning rules. because of my eviction I was forced to leave Seattle to find affordable housing. I have since moved back, but not without a lot of tears and unneeded stress. I had to leave a job that I enjoyed and could have advanced in to go back to a former job I hated that paid more. I am a productive member of this community with a lot to offer and I deserve to be here just as much as the wealthy amazon employees. Seattle is so strapped for affordable housing that we should be doing everything within our power to create more affordable housing for all of our community members!

## Emily Mitchell

10/22/2017 21:00

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. 1) One of the residences should really be owner occupied. The U-District can be studied as what happens when only renters, and not owners live on site. The neighborhood is perpetually trashed, because residents aren't invested. 2) Preserving the character of a neighborhood should be considered. As written, these changes are basically an upzone, changing the character, rather than increasing density within that neighborhood's character.

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes. There is a problem with the rear yard coverage limit. As suggested, it could result in 99% coverage (60% plus less than 40%).

**Bob D.**

10/22/2017 23:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Consider allowing two ADUs where both are AADUs. This will allow non-conforming triplexes in single family zones to have legal units that will have a permanent zoning status (if a non-conforming triplex burns down, the owner has only one year to construct another non-conforming triplex. This can be a very difficult timeline to meet).

**Do you have other comments or suggestions related to the scope of the EIS?**

**James Brandalise**

10/22/2017 23:13

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. I would like to see the topic of yard location addressed. I have a very long narrow lot, with the house situated at the rear.

According to current regulations, I do not believe I can build a DADU, because they are prohibited in front yards. So I have an 18,000 square foot lot--most of which is front yard--that is considered unsuitable for a DADU.

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes.

I am in favor of allowing both an AADU and a DADU on the same property.

I am opposed to having no off-street parking required.

I am in favor of having no requirement for an owner to occupy the house, AADU, or DADU.

**Deepali Baumann**

10/23/2017 9:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking MUST be addressed. Benefits/incentives to landlords/tenants with electric cars/hybrid/ORCA cards/no cars/off-street parking.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support ADUs and DADUs because this will bring rent down and allow low and middle income people more housing choices.

**Dottie Martin**

10/23/2017 10:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the option to build ADUs.

**Susan Shorett**

10/23/2017 10:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

**Susan Shorett**

10/23/2017 10:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

By changing the rule from a owner-occupied residential to a non-owner occupied dwelling, it increases the investment opportunities of many people who want to buy a property with more than one living arrangement but do not want to live there. I am a Realtor and had a listing in 2017 that had a legal ADU attached to a single family residence.. so the potential to rent out both units. I could not sell the property because everyone who could afford it, wanted it for an investment property. It is now a rental and AirBNB. The seller was upset that the zoning restrictions of the owner occupied ADU limited the buyer pool interested in her property. I think we need to make sure that zoning is changed to allow for non-owner occupied.

**Do you have other comments or suggestions related to the scope of the EIS?**

By removing the parking zone rule that requires a legal ADU to provide off-street parking, the pressure on already limited parking will not be good for Seattle streets. If we want to allow for higher density, we have to include a plan for increased cars and parking. We cannot only plan that residents will take the bus or ride a bike. Many people actually need a car and providing a place to park off-street is important. I believe all developers should be required to provide parking.

**Jared Banks**

10/23/2017 10:58

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the permit process streamlined and improved. We need to be able to fast track DADUs and ADUs.

**Do you have other comments or suggestions related to the scope of the EIS?**

I 100% support alternative 2. We need more DADUs and ADUs in Seattle. We need more homes. I live in Maple Leaf. Adding more DADUs and ADUs would improve the quality of life for residents and make our neighborhood more affordable. Please ignore the NIMBYs who resist change. Alternative 2 is the future.

As an architect focusing on residential, I see the huge demand for ADUs and DADUs.

**Bonnie Ellsworth**

10/23/2017 12:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I agree with allowing non owner occupied ADU'S (one only) with no off street parking. I don't agree to 2 ADU's on one property.

**Ellis**

10/23/2017 13:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

**Alex Mabery**

10/23/2017 14:31

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 is the way to go. We need to move this along as fast as possible. Alternative 1 (do nothing) is NOT an option.

**John Tullius**

10/23/2017 14:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I've heard some "stories" that the cost of building a DADU is often prohibitive due to the additional charge King County assesses for waste hookup. Is this true? And is there anything the city can do to offset this?

**Do you have other comments or suggestions related to the scope of the EIS?**

I prefer alternative 2 on most of the EIS suggestions. The exception is number 3. I think it is a good idea to have the owner have to occupy a portion of the property, at least in single family areas to avoid say worst case 3 separate parties on one small property without a responsible owner.

**Carol Curtis**

10/23/2017 15:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I don't agree with the change in #3 owner occupancy. Affordability is the big issue in Seattle. Allowing non-owners to have 3 rentals on one single family zoned property will make it more difficult for those who want to own and live in single family neighborhood to buy homes that are for sale. They will be outbid by moneyed interests who are in the rental business. Let's allow the property owners to utilize the value of their property. And owners will have a personal investment in keeping up their homes and supporting the neighborhood.

**Patricia Pronesti**

10/23/2017 16:30

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

New rules is my preference

**Do you have other comments or suggestions related to the scope of the EIS?**

I like the new rules

**Johannes Rich**

10/23/2017 16:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Hi,

I really think that the parking requirement for DADUs and ADUs should remain. It is already too hard to find parking as is, I can only imagine how much harder it will be if even 2% of the homes in my neighborhood (which has over 5000 residences) adds an ADU or DADU whose resident has possibly 1 or 2 vehicles.

To give incentive for homeowners to build DADUs with parking, the size restrictions should be changed. Max size limit for DADUs should go up to 1000 feet, like ADUs, and this size should NOT include garage/parking/storage space.

Allowable lot coverage should be increased, as should total building height to allow homeowners to have a second level that's tall enough for someone over 6 feet to stand comfortably in!

Thank you,

Johannes

**Chetan Sharma**

10/23/2017 19:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

This project should not be derailed by small groups of angry people. Please pass these rule changes with haste.

**Faith Lumsden**

10/23/2017 19:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I'd like to see you consider an alternative that allows a fully separate lot with a small lot size, say 3000-3500sf. And on that lot you could build the DADU. Have severely restricted development standards, although bigger slightly than the proposed size for DADUs. This alternative keeps the "triplex" issue away, and provides an incentive for people who want to own their cottage rather than just rent it. It might even get built with parking, because owners might want to park their car on their own lot. Or not. Who knows?

I think you'd see a lot of small cottages if they could be sold and owner occupied. I haven't thought about the condo idea, but that might be another approach to allowing owner occupancy of these small DADU units.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jason Nivens**

10/23/2017 20:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

No

**Penelope Scordas**

10/24/2017 9:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I think this is a horrible idea and will just add to the already increasing density this city is undergoing. To not have owners on the property and to not have parking is outrageous. I strongly and loudly say NO! to this proposal.

**Melissa Fessel**

10/24/2017 9:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The lot coverage limit of 35% should be increased.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the proposed changes to the ADU legislation. My husband and I are currently renting in Upper Queen

Anne. We have extensive ties to the community in that I worked as an ICU nurse at Harborview and obtained a doctorate in nursing practice from the University of Washington.

1. My parents want to build a DADU so that my family can live in the remodeled primary residence. This would enable us to afford to stay in the neighborhood we have lived in as renters, but also provide privacy between our 2 families.
2. 800 square feet, including a garage and mechanicals, is too small for a primary residence for my parents. They are retired, like to cook, and both have hobbies.
3. The owner occupancy limitation for life should not be required in case my parents have to move to a different residence.
4. The lot coverage limit and rear yard coverage limits are too restrictive. My parents would like to build a single story DADU so they can age in place. Also, the homes in the Queen Anne area are mostly large and cover more of the lot than is being required for those wanting to build a DADU.

Thank you for your consideration.

## David Rodgers

10/24/2017 10:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

This proposal would be, if approved, the end of Seattle's neighborhoods. I have lived in Seattle for over 50 years. My Grandfather moved to Seattle almost 120 years ago. My father was born in Seattle. My wife, children, and Grandchildren were born in Seattle. My family has roots here. My neighborhood, Phinney Ridge has been a wonderful neighborhood to be a part of. Neighbors know neighbors. Neighbors support neighbors. Our neighborhood is a "village". Recent changes to the greater neighborhood (urban village) have been painful. Driving around is no fun - too much traffic in too big a hurry. Trying to park your car in your neighborhood is more difficult by the day. The "quality of life" has been on a downward spiral for a long time. This proposal would be the final assault on single family homeownership in Seattle. It would kill the neighborhoods. Shame on Councilman O'Brien for proposing this.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Comments above

## Mark Donahue

10/24/2017 11:40

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

What is the practical implication of this? Under the proposed change could any home on a lot > 3200 sf essentially be torn down and converted into a triplex (or a duplex and a freestanding apartment)? Parking capacity and sanitation are two immediate and obvious concerns.

**Do you have other comments or suggestions related to the scope of the EIS?**

**matthew barrett**

10/24/2017 12:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Need to emphasize the dangers of offering only off street parking. We currently have a multiple unit building across our street and this building does not provide off street parking. All the units have multiple cars and they are forced to park on the street. This creates traffic jams, accidents, near accidents and forces children to run across traffic every day. Very dangerous for all involved. If the unit had off street parking, the issues in terms of traffic and accidents would be prevented. Units with no off street parking are very dangerous to Seattle' residents.

**Do you have other comments or suggestions related to the scope of the EIS?**

Need to emphasize the dangers of offering only off street parking. We currently have a multiple unit building across our street and this building does not provide off street parking. All the units have multiple cars and they are forced to park on the street. This creates traffic jams, accidents, near accidents and forces children to run across traffic every day. Very dangerous for all involved. If the unit had off street parking, the issues in terms of traffic and accidents would be prevented. Units with no off street parking are very dangerous to Seattle' residents.

**Lee London**

10/24/2017 16:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Our city has a housing crisis, and we need more affordable housing in single family zones. I would like to focus on the positive housing impact of allowing ADU's and DADU's with the same lens as MHA.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support alternative 2 as an easy way to provide more housing in our city.

**Jennifer Kattula**

10/24/2017 16:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes: Will the houses with ADUs be required to have additional off-street parking? What impact to parking will additional ADUs have on existing residents (homeowners and not)? What impact will additional ADUs have on green space / trees that may be replaced by ADUs? What recourse will homeowners or neighbors have for increased noise, waste and pollution? Why are homeowners not required to live in the unit?

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes. Currently, most houses don't even have one ADU. Why is the city wasting time on a proposal when existing ADU opportunities have not yet been maxed out? We have not yet seen the possible scope of impact from parking, noise and waste with additional housing units, let alone the impact from a community and aesthetic perspective. In addition, if these units are to increase housing, there should be a requirement that the homeowner live in the house for units with 1+ ADUs. Otherwise, this is no better a solution than replacing single family homes with

condos - that are not adequately planned for noise, waste or parking - as has been happening all over Seattle.

## Matthew Cohen

10/24/2017 17:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the proposal to analyze the impacts of waiving the requirement that the owner reside on the property occupied by a DADU. I believe that this rule change would improve the prospects for DADU development in Seattle, without adversely impacting neighborhoods.

## Ann E Prezyna

10/24/2017 19:31

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Tree canopy impact. the creation of urban heat islands because of the reduction in urban green space, and the effect on urban wildlife of diminished tree canopy and increased heat islands

**Do you have other comments or suggestions related to the scope of the EIS?**

## Michelle Blanchette

10/24/2017 22:46

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

This is truly a terrible idea. All this will do is create more Airbnb rentals, not permanent housing. More land will become impermeable to rainwater. More exhaust problems, more parking issues, more overcrowding of a city that long ago reached capacity. Stop this madness!

## Guy Hollingbury

10/25/2017 9:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the requirement for off-street parking to be kept in any proposal.

**Do you have other comments or suggestions related to the scope of the EIS?**

The lack of residential parking has become a major issue in Seattle. On-street parking is inadequate and is therefore not an acceptable solution. With any proposal to increase density housing It is unrealistic and irresponsible not to include provisions for parking for ADUs in the EIS.

## Jill Davies

10/25/2017 9:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

I don't agree with the change in #3 owner occupancy. Affordability is the big issue in Seattle. Allowing non-owners to have 3 rentals on one single family zoned property will make it more difficult for those who want to own and live in single family neighborhood to buy homes that are for sale. They will be outbid by moneyed interests who are in the rental business. Let's allow the property owners to utilize the value of their property. And owners will have a personal investment in keeping up their homes and supporting the neighborhood.

## Andrew Kidde

10/25/2017 11:11

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think the EIS should focus on this question

#### **Do you have other comments or suggestions related to the scope of the EIS?**

To meet the City's goals regarding climate change, we must dramatically reduce our greenhouse gas (GHG) emissions. We are failing to do that in our transportation system largely because of our reliance on cars. Eliminating off street parking requirements for ADUs will help to promote a new form of mobility that SDOT has described in its New Mobility Playbook (2017) and will help reduce our greenhouse gas emissions. Also increasing density with ADUs will help our neighborhoods attain densities that are transit supportive. The EIS should focus on these dynamics. GHG reduction is the most important task we have -- our children's welfare depends on it.

## matt barrett

10/25/2017 12:28

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Need to emphasize the dangers of offering only on street parking. We currently have a multiple unit building across our street and this building does not provide off street parking. All the units have multiple cars and they are forced to park on the street. This creates traffic jams, accidents, near accidents and forces children to run across traffic every day. Very dangerous for all involved. If the unit had off street parking, the issues in terms of traffic and accidents would be prevented. Units with no off street parking are very dangerous to Seattle' residents.

#### **Do you have other comments or suggestions related to the scope of the EIS?**

Need to emphasize the dangers of offering only on street parking. We currently have a multiple unit building across our street and this building does not provide off street parking. All the units have multiple cars and they are forced to park on the street. This creates traffic jams, accidents, near accidents and forces children to run across traffic every day. Very dangerous for all involved. If the unit had off street parking, the issues in terms of traffic and accidents would be prevented. Units with no off street parking are very dangerous to Seattle' residents.

## Hans Muir

10/25/2017 13:22

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to know how much additional capacity our infrastructure can handle, or if allowing these zoning changes will result in over utilization of existing infrastructure (such as sewer, etc..). Will upgrades be required, and if so where will the biggest impact be felt? How will the city make accommodations for the traffic and increased noise and air pollution?

### **Do you have other comments or suggestions related to the scope of the EIS?**

If people are not able to attend the meetings in person, what is the best way to have an impact on the process?

## Darcie Wells

10/25/2017 13:43

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

It would help me and others tremendously if owner-occupancy criteria were removed to allow more DADUs

### **Do you have other comments or suggestions related to the scope of the EIS?**

Please consider doing everything possible to allow more DADUs to increase density!!!

## Richard Glasman

10/25/2017 17:26

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

That DADU's would NOT trigger "full" alley/ street improvements if alley or street is currently unimproved. And that a provision for on-site stormwater detention be allowed.

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. I have never understood the idea that an ADU entrance needs to be further away from a property line than a building setback. Maybe it should be no closer than 10' to a neighbor's HOUSE, not the property line. 2. Will this change come with an accompanying property tax increased based on increasing property value because of new density potential? (just curious) (... I'm in favor of everything you are proposing)

## Lisa Marcus

10/26/2017 9:40

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think it's very important to allow development of ADU housing without linking them to off street parking. I think financial encouragement should instead be given to people who choose to use other greener methods of transportation like bikes, buses, and walking. And that our infrastructure for those should be improved dramatically on a very short timeline. Encouraging as much housing as possible in the city on currently single family lots keeps people from having to drive long distances to work, which reduces green house gas emissions. This is a climate issue and we need solutions like ADUs which provide housing working people can afford in the city where public transit, walking, and biking are accessible modes of transportation to work. Please make it as easy and flexible as

possible for people to choose to create these units!

Thank you for taking these issues into account.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Casey O'Connor**

10/26/2017 11:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, I would like to see whether tiny homes on wheels would be considered as DADU

**Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 gets the city of Seattle closer to providing more choices for affordable housing - I strongly urge its adoption. Too many of our citizens are being priced out of the city.

**Scott Bonjukian**

10/26/2017 11:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Social, racial, and economic equity issues created by not increasing production of ADUs

Impacts to climate change of not increasing production of ADUs

**Do you have other comments or suggestions related to the scope of the EIS?**

On-street parking should not be studied, and if it is the loss of on-street parking availability should not be considered a negative impact to the ENVIRONMENT.

**Lisa Richmond**

10/26/2017 12:01

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes! I think the city should consider the carbon emissions impacts of the alternatives. "No action" would contribute to sprawl and increased emissions, while the new DADU proposal could contribute towards the city's greenhouse gas emissions targets. The city should also consider the social and economic impacts of allowing households to create more on-site housing for extended family or rentals, which they cannot do in the current alternative. Finally, the transportation considerations currently seem to be primarily focused on individual car ownership and use. The city should evaluate how increased density would create additional demands on transit, and how the city can meet those new transit needs.

**Do you have other comments or suggestions related to the scope of the EIS?**

**William Gagne-Maynard**

10/26/2017 13:41

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

We are in desperate need of more housing in this city. I would urge the OPCD to strongly weigh the need for housing within city limits versus the relatively small impacts on parking. As more and more people move to Seattle, we must shift from a car-centric lifestyle to one that fully utilizes the wealth of other transportation offerings within the city.

**Tonya Hennen**

10/26/2017 13:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I was appreciative that the concern of housing affordability is being considered in this scope. Adding DADUs and making ADUs easier to build in our SFR neighborhoods is a great way to increase density while maintaining a residential neighborhood feel. In addition, the allowance for increased cottage size/lot coverage is likely to up our housing stock that is single story and more accommodating than the townhome model has been (plus more discreet and attractive).

I also favor removal of the owner occupancy requirement. A high percentage of the SFR neighborhoods is already rental stock, more than many residents realize.

Hopefully there is room for flexibility in the proposed alternatives; I appreciate concerns over owner-occupancy and parking availability, but for any of the alternatives there are ways to meet needs part way. Having owners occupy the first year or two could discourage simple investment, for example.

**Joseph A Sueno**

10/26/2017 15:31

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The city needs more housing to drive prices down and to prevent dislocation of it's current residents. Any way people like myself can my my property more hospitable to accommodate this shortfall is helpful. I really like the current proposal to increase ADU and DADUs to 2. But I would also suggest:

Up-zoning. I own a property in which most of my block is Low Rise 1 and they were grandfathered into it. My property is Single Family 5000. I would like to be able to make the process of rezoning to a more dense use easier.

**Do you have other comments or suggestions related to the scope of the EIS?**

I highly support any effort to increase density for homeowners of small properties. It will provide a financial incentive for homeowners and provide much needed housing to the city. All the benefits don't just go to big time developers.

**Michelle Rupp**

10/26/2017 15:38

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Anything at ALL you can do to lighten the regulations

**Do you have other comments or suggestions related to the scope of the EIS?**

I love that you are addressing this in our current housing market. I have a single family home, but am currently living with my mother in another neighborhood. We are super green and it seemed the best use of resource. My home is empty! I can't do an ADU on the first floor of my home because I don't live there. I will be doing it but have to move back into one floor - just ridiculous! It would be an amazing two family unit. I have plenty of parking on my property. It seems ridiculous that I can only rent out one floor when people are begging for affordable rental units. Lightening our ADU requirements is such a necessary and easy step. This city is changing and all of us in single family neighborhoods need to share in the burden of housing our population!

**Robert Kettle**

10/26/2017 15:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Follow-on inflationary impacts on the city.

**Do you have other comments or suggestions related to the scope of the EIS?**

The housing building boom underway has the sector at full speed and is quite inflationary for the city. Changing the zoning as proposed will only increase the inflationary pressures and make the city that much more unaffordable for the poor, the elderly and others on a fixed income. It is important for the city to step through the follow-on economic effects of the proposed changes before jumping in on this with both feet. Thank you.

**Casey Wescott**

10/26/2017 22:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I wholeheartedly support Alternative 2 and believe it would be a necessary solution to accommodate density whilst remaining the sense of community that single family neighborhoods enjoy.

**Lily Slater**

10/26/2017 22:42

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I support alternative 2, I think it would be good for the city to move forward and offer alternative housing options for people to live here. All demographics should be welcome in our city.

**Cooper**

10/27/2017 8:25

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Personal anecdote: My father is a carpenter and my sister has a good sized backyard in S Seattle. He has offered to help with building a DADU. Buying a home is a huge financial hurdle and plus we want to live close to family, rather than having to move even further away from family in the city where we could \*maybe afford to buy. For a couple planning to have children, and wanting to stay in that home for a very long time, 800 square ft limit felt like it might be a deal breaker. Those 200 extra square would make all the difference for us. Thank you.

**Christopher A. Grimm**

10/27/2017 11:18

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

no

**Do you have other comments or suggestions related to the scope of the EIS?**

no

**Susan Francis**

10/27/2017 13:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The lot coverage limit should be expanded beyond 35%.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support amendments to the planning code/zoning ordinance to encourage the production of secondary units in single family districts.

I own a modest house in Upper Queen Anne on a 5,300 square foot lot. My objective is to build a DADU for my husband and I to age in place and at the same time remodel the primary residence to bring it up to contemporary standards for a young family; my daughter and her husband.

1. Off Street parking solutions are difficult to understand and implement. We believe in the use of permeable surfaces, but zoning could not recommend any allowable treatments. There is plenty of on street parking in the area of our house and the surrounding residences do not seem to be held to the same standard.

2. There should not be a restriction on our deed that there be owner occupancy forever. My home is in a living trust and I don't want my children to have to sell the property and lose their housing security because my husband and I are gone.

3. The current limitation of 800 square feet (inclusive of mechanical, etc.) does not net out enough space for easy paths of travel, rooms that support our love of cooking, , entertaining with family, privacy, and hobbies. Obviously the proposed change is more responsive to my square footage concern, although it still encourages a multi-story unit which won't be suitable for me as a senior citizen.

4. The existing lot coverage standards appear to be more restrictive than what exists with neighboring homes. Many of these homes are very substantial or have significantly more lot coverage than 35%. We have noticed many of these homes being remodeled and their existing (non conforming) footprint does not seem to be an impediment to their remodeling projects. The lot coverage standard pushes the secondary unit into a two story

building. This is at variance with our needs for a single floor plate home to age in. These concerns also extend to coverage of the rear yard.

In conclusion, I think that DADUs should be allowable in a more flexible manner. Seattle is becoming a very expensive place to live. By having DADUs or ADUs that are affordable to build more middle income people, including seniors, will be able to live here. My daughter obtained a doctorate in nurse practice at UW and her husband is also a professional. They would like to remain in Seattle, not just as renters. The support we could give each other in the housing situation we are proposing would give them the opportunity to remain in Seattle.

## **Laura Loe (Bernstein)**

10/27/2017 14:15

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please study an Alternative 3 to look BEYOND backyard cottages to rezone Seattle for a walkable, resilient, climate-friendly city!

Please study the full impacts of the SF 2 recommendations in HALA.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I signed, along with over 300 people in less than one week, the petition:<https://www.change.org/p/sign-this-petition-beyond-cottages-2-address-seattle-s-housing-crisis>

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

PLEASE DO THIS AS SOON AS POSSIBLE WE ARE IN DUAL HOUSING AND CLIMATE CRISES!

## Jesse A Willard

10/27/2017 15:46

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please explore the possibility of adding more units, perhaps in the form of stacked flats.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I find it particularly upsetting that so many parks are surrounded by single family zoning. Parks help make density more livable, especially for families, and I would love to see all city parks surrounded by multifamily housing, especially parks that are well served by mass-transit. I would also like to see more neighborhood commercial zoning, or better yet mixed use zoning with commercial space at street level and apartments above. Four floors and corner stores!

## James Woodley

10/27/2017 16:44

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

**Jack J. Pollard**

10/27/2017 22:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I do not have any additional topics/concerns that I'd like to include in the EIS.

## **Do you have other comments or suggestions related to the scope of the EIS?**

I have two specific concerns with the EIS process:

1. I view the need for more affordable housing as a high policy priority for Seattle. Many of my friends are being forced out of the Seattle housing market because of the rapidly rising prices.

I don't know how the EIS process will weigh the relative benefits and costs associated with the ADU changes. But my hope is that the EIS weights the basic benefits of increased ADU housing as more important than the possible negative impacts. The consequences of not accepting and coping with the impacts of greater housing density is that Seattle will become a town affordable by only the top 25% of the population.

2. My second concern is more specific, and is about the parking alternatives currently presented. I believe there are other possible alternatives that could be explored:

a. First, the need for off-street parking could be eliminated if only one AADU or DADU exists. If both an AADU and DADU are present on a single-family lot, then one off street parking space could be required.

b. Second, Seattle neighborhoods vary significantly in off-street parking congestion. Therefore, I would examine the feasibility of off-street parking requirements being adjusted to the existing residential density.

For example, I have lived in the Green Lake neighborhood (on Stroud Ave. N) where parking is very tight, streets are narrow, and there are very limited off street parking possibilities. In contrast, where I live now in Rainier Beach (on S. Ryan St.), the neighborhood density is much lower, streets are wider, most houses have garages, and off-street parking is readily available.

My proposal is to use an objectively measureable assessment of available off street parking to analyze parking availability. I believe the city already has something like this created. This assessment could then be used to create requirements for off street AADU/DADU parking that are tailored to the specific Seattle neighborhoods, or at an even finer scale, by specific street segments.

## **Kalman Brauner**

10/28/2017 12:38

## **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Specific comments:

- Do not do anything that would increase current height restrictions
- Do not do anything that would reduce current setback requirements (setbacks from adjacent properties, streets and alleys.
- Do not do anything that would reduce the amount of off-street parking.
- Do not Ballard-ize any more of Seattle. Ballard is now an abomination. I used to enjoy Ballard. Poor Ballard.
- One accessory dwelling unit (ADU) per single-family-zoned lot is sufficient - perhaps more than sufficient.

General comments:

- I value Seattle's neighbors as they currently are: lawns, gardens, trees, squirrels, homes with significant setbacks from adjacent properties, homes with modest heights with few (no?) homes greater than two stories above grade level. I want these features preserved in the neighborhoods where these characteristics are the norm.
- If you must, increase density in communities that do not enjoy the characteristics I mention in the previous bullet. Among these communities are: Ballard (south of about NW 58th St - that area is already "gone"), Downtown, Belltown, Lower Queen Anne (Uptown), Northgate, Pioneer Square, Capitol Hill (alas Capitol Hill was lost long ago), the International District, and South Lake Union (poor South Lake Union).
- I don't want Seattle to turn into Manhattan (NYC), San Francisco, or Daly City (a suburb of San Francisco).
- I personally know (at least) seven people/couples who have moved away from Seattle primarily because of population pressures and its attendant congestion problems. Beginning about three years ago, my wife and I have begun thinking of joining these "expats." As we both love Seattle, we don't take lightly thoughts of leaving our city -- we have lived here for over 40 years.

Bottom-line:

- I understand that there is now great demand for housing and that this demand is causing housing to be unaffordable for many. I regret this, but I am not willing to sacrifice the city I love to mitigate this problem. Strive to find solutions other than those that would destroy the character of our lovely neighborhoods.

Kalman Brauner

2603 Queen Anne Ave N

Seattle WA 98109

206-282-2927

**Tashana Kolanowski**

10/28/2017 13:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think the allowing ADU's or DADU's to be operated with no owner on site is turning it into a multi-family and skirting the single family zoning. This should not be allowed. If it is allowed then the zoning should be changed. In the neighborhoods that I have experienced absentee landlords, these are the properties more often that fall into neglect, disrepair. Having the owner onsite offers huge benefits to the neighborhood they are living in and allows the surrounding owners someone contact if they have issues. Onsite owners also typically care more for the property they live in and have a better chance of intervening if a tenant starts being a nuisance (noise, property damage etc...) rather than an asset.

The Rental Registration is just silly. Please remove this useless ruling. Most property owners that I speak with that rent out their basement or other areas of the house know nothing about it and question why it is even a policy.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the ability to have two rentals in an owner occupied property. I see this more and more as a way for owners to be able to afford to age in place when they retire. Or downsize by renting out the larger spaces in their house while they live in the MIL or ADU or DADU. I also support this idea for the benefit of adding more housing availability to all price ranges of rentals. In a very expensive city, it is very difficult to find rentals close to the major employment centers that are not priced out of the range of hourly employees. The ability to have more than one ADU on your property also helps with density and allowing for more people to be able to live in the 'walkable' neighborhoods, reducing urban sprawl and taking some cars off the road.

**Paul Chapman**

10/28/2017 15:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I prefer Alternative 2 as outlined in the EIS.

I would like the EIS to also consider:

- Additional methods to increase the affordability of ADUs & DADUs by

1. Reducing the permitting requirements for ADUs. Under current regulations an ADU requires the full permitting process, which adds thousands of dollars and several months of delays to the construction process. ADUs should instead require only a Subject To Field Inspection permit plus a final habitability review.
2. Reduce or eliminate the permitting fees for ADUs & DADUs provided they are rented out full time for a period of at least 1 year (and not rented on AirBnB or similar)
3. Reduce or rebate the cost of sewer hookups. Perhaps the city could rebate a portion of the sewer fee every year in exchange for renting the unit at an affordable price point.
4. Reduce property taxes on the increased valuation of property with an ADU or DADU that is rented out full time at median rent or below.

- Ways to expand the number of city lots on which a DADU can be built by not including in the lot coverage limits existing structures that do not hinder water permeability. For example, decks higher than 36 inches should not count towards the lot coverage limit.

**Do you have other comments or suggestions related to the scope of the EIS?**

I prefer Alternative 2 as outlined in the EIS.

**Samantha Smith**

10/28/2017 23:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Being a single family homeowner, I welcome the expanded use of single family lots without creating large, intrusive apartment complexes. However, I think the elimination of off street parking requirements could cause potential safety issues in many neighborhoods. Lots of Seattle streets are already narrow and dangerous to pedestrians and cyclists alike; there are limited sightlines, few crosswalks, and side streets are often only wide enough for one car to pass at a time with parking on both sides of the street. Add in school zones and limited bike lanes, and

it's a disaster. Adding more street parking pressures to an already overcrowded city could be hazardous. We need to make sure we are taking everyone's safety into account. We need to grow better, no just bigger.

**Do you have other comments or suggestions related to the scope of the EIS?**

As to parking and related street safety, perhaps adding more crosswalks, bike lanes, lower speed limits In single family house neighborhoods, one side only parking on narrow streets, enforcing/enacting of the no parking within 30 feet of stop signs rule, and more permit parking streets (with caveats for low-income folks of course.) Or requiring ADUs to have at least one off street parking spot per unit, to keep more cars off the streets.

**Samantha Smith**

10/28/2017 23:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to add to my previous comment the need for increased/improved public transportation to single family home neighborhoods. Enticing tenants without cars to out of the way neighborhoods with better public transit systems would really improve parking and safety, and eliminate some (but not all) need for off street parking.

**Do you have other comments or suggestions related to the scope of the EIS?**

Adding more bus lines, better run times for buses, and more bike lanes would be a great improvement and discourage car usage.

**Susan Cook**

10/29/2017 11:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

All the concerns listed above are relevant and important, but do not address affordability of housing, as it gives so much more advantage to developers to create more megahomes that are not affordable!!!!

**Do you have other comments or suggestions related to the scope of the EIS?**

Seattle's single family neighborhoods have high quality of life with garden areas, walkable shopping districts and safe streets for families. Increasing density so drastically as CM O'Brien suggests will destroy the environment and safety for thousands of tax paying citizens and open the door to rampant development that solves no housing problems. City must also be sure to advertise open public meetings in the neighborhoods affected and approach this EIS seriously.

**Samantha Smith**

10/29/2017 12:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Perhaps a tax on non-occupant owners/developers could create revenue for the new infrastructure necessary, i.e. increased transportation, sewer/water, education, social services, etc. Also, I think the MHA should definitely apply to non-occupant owners; this will allow for increased housing affordability, discourage social-economic and racial segregation, and encourage in-community development. Let's grow better, not just bigger.

## Chuck Ross

10/29/2017 13:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please clarify that all of the elements of the 2016 proposed ordinance are included in the study.

Please study the effects on Seattle's aging sewer infrastructure and treatment capacity.

Please study the need for additional fire codes.

Please study the need for additional park space to accommodate increased density and dog ownership.

Please study the need for design review hearings for new DADU's.

Please study impacts to specific areas for the broad changes proposed. Example: should narrow, one lane streets in older neighborhoods be treated the same as a wide two lane road in a newer area.

Please study the effect of elimination of housing diversity options. No other major US city has abandoned single family home ownership.

Please study the cumulative impacts that result from the incremental impact of the proposal when added to other past, present, and reasonably foreseeable future actions and population increases.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Brady Hall

10/29/2017 15:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

no

### **Do you have other comments or suggestions related to the scope of the EIS?**

Updating the ADU regulations for a growing and evolving Seattle is crucial. I strongly agree with Alternative 2 in the proposed changes. Allowing an additional ADU, removing the parking requirements and removing the owner occupancy rule will allow Seattle to help deal with the current affordable housing crisis that is negatively affecting so many people. Cars are becoming less important as public transit and ride sharing services become more comprehensive. Density is the key to keeping Seattle growing and thriving for everybody, not just the people in higher tax brackets. There are so many lots that could easily accommodate one or two ADUs and give housing to people who need it and give the homeowner some extra cash. If set up and regulated properly it can be a win/win for everybody. As long as predatory landlords and speculators are kept in check this can only help a Seattle that is desperately needing housing relief.

## Susan Conn

10/29/2017 16:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

It's not clear, to me, what the ingress and egress regulations are for the proposed changes. If the existing home on the SF 5000 square lot has no driveway, garage, or alley access, would DADUs be allowed? I do have concern, as a renter, about the possible demolition of my home-which is a side by side duplex, and the possible construction

of one or two ADU units on the property.

**Do you have other comments or suggestions related to the scope of the EIS?**

I do agree that we in Seattle need more affordable housing options. However, there are existing duplexes and triplexes in my neighborhood, a single family zoned area that must have had either other zoning, or "grandfathered in" existing multiple units.

I could see the possibility of my landlord tearing down my duplex, displacing 2 people, and building 4 units that I honestly believe wouldn't be affordable, for myself, my neighbor, or any other working families with income that is below the Seattle median. It would however, be lucrative for the landlord.

**Eric Helgeson**

10/29/2017 16:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I support alternative #1 but not # 2 in any form .

I feel the owner should live there or we have the potential of absentee landlords with he problems too numerous to list but well know as that has been in the media (print/TV).

I also do not support the facade facing any direction.

**Do you have other comments or suggestions related to the scope of the EIS?**

**CHA'RON STEWART-SILANO**

10/29/2017 16:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

YES. 2 MEETINGS IN SEATTLE IS NOT EQUITABLE TO THE CITY AT LARGE.

**Do you have other comments or suggestions related to the scope of the EIS?**

I WOULD PROPOSE THAT THE PROJECT GO BACK TO COMMITTEE AND A SERIES OF MEETING HOSTED IN THE MOUNT BAKER, BEACON HILL, COLUMBIA CITY, HILMAN CITY, RAINIER BEACH AND RAINIER VIEW AREA BE CONDUCTED THROUGHOUT THE END OF THE YEAR.

THE OUTREACH FOR THIS PROJECT IS HORRIBLE (AS USUAL) IN ORDER FOR THE CITY TO GET TRUE AND HONEST FEED BACK FROM THE CITIZENS AND CONSTITUENTS. THE RECOMMENDATION IS THAT THIS SUBJECT BE HIGH ON THE PRIORITY FOR FURTHER DISCUSSION AND ADDED TO AGENDA FOR ALL NEIGHBORHOOD COUNCILS MEETING THROUGH THE END OF THE YEAR; RESPONDERS TO THIS DEADLINE SHOULD BE GIVEN MORE TIME TO RESPOND. CITY COUNCIL MEMBERS AND/OR A REPRESENTATIVE FROM THEIR OFFICE MUST BE PRESENT WHEN THE RECOMMENDATION ARE GIVEN VERBALLY.

**JB Eyttinge**

10/29/2017 17:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see a thorough analysis and plan to relieve the existing traffic congestion and parking space conditions dealt with first. The amount of traffic congestion in many neighborhoods results in dangerous situations as it is. I see that cars are often parked much closer than 30 feet to intersections. I am frequently on Queen Anne Hill and entering on to Boston Street from a side street is often a white knuckle experience as I am unable to see traffic on Boston as there are cars within 5 feet of the intersection blocking my ability to see fast moving traffic on Boston. Boston Street is only one example of many.

I would propose that any changes to a structure or additions of structures on a lot, which increase the number of living units, provide 1 off-street parking space for the each of increased number of units.

Let's do some basic due diligence steps and research the experience that other cities, counties, etc. have had with such actions before moving ahead.

**Rachael Ludwick**

10/29/2017 18:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should evaluate the environmental impact of increased density. Nearly all scientific studies indicate increased density has lower impacts on the environment. All proposed changes should be evaluated on predicted increase in density because that's what will keep people from moving outside of the city, adding long car commutes.

The EIS should also be evaluated in terms of racial parity and compensation for historical wrongs. Single family housing zones were formed explicitly to exclude non-white residents and continue to benefit the existing residents of neighborhoods, and those who can afford to buy into them. Non-white people around the world will be those harmed the most by the impacts of climate change so any environmental assessments we make should acknowledge that reality and that by failing to do as much as we can to decrease our impacts, we are harming people.

**Do you have other comments or suggestions related to the scope of the EIS?**

The proposals do not seem to include sufficient incentives to actually result in significant in-fill construction thus increasing density and lowering environmental impact. Even with these changes, it will only mildly relax the rules for building. There are no positive incentives such as decreased permitting fees. Some things we should do to change that include:

- \* waiving permit fees for ADU/DADUs
- \* accelerating or putting projects at the "front of the line" at the permit office if the owners commit to renting at below market rates for some period of time
- \* allow larger units or greater waivers for less environmentally damaging ("green") units
- \* where residential units are in close border to denser zones, allow permitted features of those denser zones to "bleed" over into the single family zone when building ADU/DADUs such as allowing additional height if the adjacent zoning allows it
- \* reduce the incentives to tear down one single family home and build a huge replacement single family home which doesn't increase density and privileges the wealthy

- \* allow shared and split ownership of lots with multiple units
- \* increase loan and funding sources for ADU/DADU buildings using the Office of Housing
- \* study an explicit city funded program to subsidize building ADU/DADU units if the owner commits to rent it at below market rates for some number of years
- \* similarly, study subsidizing building units to explicitly be used to provide transitional and long-term housing for single adults and smaller families experiencing intermittent homelessness (expand the Block Project)

## Neale Frothingham

10/29/2017 18:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the EIS assume current levels of in-migration and examine how much land is consumed without this change and with this change? Does this change reduce sprawl, and what are the environmental benefits of having more growth closer to transit, urban infrastructure, and jobs, vs. being more dispersed?

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Rachael Ludwick

10/29/2017 18:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I made a previous comment and neglected to include that my family built a DADU a couple years ago. The process was extremely frustrating, the unit ended up costing more than expected, partly because of the rules, and the new rules relax at least one issue we ran into. We built ours for a particular familial reason (a place for my retiring mother to live), but given our experience I don't see how any family without a strong incentive like ours would be willing to go thru the trouble.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Jean Jones

10/29/2017 18:44

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Allow owners of ADU units to live off site

## Timothy Becker

10/29/2017 20:16

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the owner occupied requirement removed from the regulation. The size requirements is not a concern. Thank you

**Do you have other comments or suggestions related to the scope of the EIS?**

**Kelly Morgan**

10/29/2017 21:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No more three story gargantuan houses! Require them to blend in with neighborhood more!

**Do you have other comments or suggestions related to the scope of the EIS?**

I think only one ADU should be allowed in addition to a space in the house. Give incentive for homeowners to provide off street parking.

**Andrew Katz**

10/29/2017 22:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage. Please expand EIS scope to include an Alternative 3 that encompasses other forms of gentle infill "missing middle" gentle-infill housing: duplexes, triplexes, townhouses, rowhouses, stacked flats, and apartments over corner stores.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm a 10-year Seattle resident and Central District/Capitol Hill renter. As I've become involved over the past 18 months as a volunteer advocate and leader in several community organizations focused on Seattle's housing shortage and homelessness problem--including the Capitol Hill Renter Initiative, the Transit Riders' Union and its Housing For All coalition, Housing Now - Seattle, the WA Low-Income Housing Alliance, and Seattle Tech For Housing--I've met a broad cross-section of my neighbors, all of whom worry about economic or physical displacement, and who desperately want a greater number of affordable housing options of various sizes and price points, for both rental and purchase. They vary in age, family size, income, and profession; what they have in common is a desire to remain part of their community, to feel housing security, and to have a voice heard by policymakers that used to be reserved primarily for wealthy property owners in prohibitively expensive neighborhoods. I believe expanding the scope of the EIS to include the following ten points would be an important step toward ameliorating the concerns I mentioned above. Thank you!

1. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
2. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary.

5. Upgrade non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
6. Buffer detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand-alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, apply brakes to gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
9. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
10. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

**Jodie Ramey**

10/30/2017 6:49

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

No changes! I chose my neighborhood because it was a single family street yet still close to the city. Now, I have a DADU behind my house that looks directly down into my backyard, into my kitchen and living room. Total invasion of my privacy. Street parking is becoming a premium and not requiring a parking spot with an ADU will add to the problem. Keep the owner occupancy, that way I know the renters will be somewhat quiet. Unless in a rural setting, no more than one ADU per lot. Quit forcing density on those of us who bought our homes because of the neighborhood.

## Julie

10/30/2017 7:22

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Renick

### **Do you have other comments or suggestions related to the scope of the EIS?**

I STRONGLY prefer alternative 1 (no change). While I object to many items in Alt 2, my biggest objection is removing the requirement for owner occupied. You have just opened the door for real estate investment companies to buy up blocks of houses and effectively triplex them. This will INCREASE the cost of more modest SF homes in city. This is sold as reducing the cost of housing and allowing modest income owners to remain in their houses. Over time, the owners who opt out of (or cannot) create ADU's will certainly be priced out as the land values and taxes escalate. Any units built in my neighborhood will certainly be higher income, increasing the value and cost of land. This is a land use change that is flying under the radar. If it is implemented, expect a huge backlash as the results become clear. The rich, of course are exempted from this as it will not be cost affecting in a 1.5 million dollar home. Just the middle class ones.

## Steven Grundmeier

10/30/2017 7:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I fully support these changes!

## Rochelle

10/30/2017 8:26

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

DO NOT ALLOW ANY MORE ADU AND DO NOT RELAX THE REGS ON PARKING ETC. With more density comes more strain on resources and infrastructure. Our sewers are failing, our streets need repair and our fire and police are understaffed and seattle is doing nothing about this but you want to encourage more growth? Not to mention quality of life issues, less privacy, more noise, no parking and since these will be rentals, a revolving door of people who are not invested in the community. This is crazy. This is all about greed, this is not about building affordable housing.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Seattle needs to STOP this war on families. First micro apartments, then high end developments that only include 0-2 bedrooms and now this! ADU will never be large enough to support a family. What they will do is bring in more single people to a family environment. We need safe spaces for our children which is why we work hard and save to purchase homes near schools and around other families. Seattle poorly regulates construction as it is so I fully expect that these will eventually have our neighborhoods looking like shanty towns for no good reason. Require developers to create affordable housing (e.g NOT the HIGH END apartments currently being built).

## stephanie cross

10/30/2017 8:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

parking - right now mass transit in Seattle isn't as robust as it needs to be and adding more people in these units in what was largely single family home locations will not only put a strain on infrastructure but especially on parking. This increases exponentially for dwellers who work from home and have clients coming and going (again in a largely single family residential area).

**Do you have other comments or suggestions related to the scope of the EIS?**

**Mary H**

10/30/2017 9:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I do not agree with removing the owner occupancy requirements as the intention of creating a ADU is to help the current owner while living there. I do not want to live in a neighborhood where there are potential triplexes that are all occupied by renters.

**Betsy Ross**

10/30/2017 9:29

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please consider the impact of short term rentals. Without restrictions, many ADUs will be used for short term rentals bringing additional traffic and congestion to neighborhoods without adding housing or creating affordability.

Please study the aging road and bridge infrastructure. In my neighborhood of Magnolia, all three bridges are in need of repair/replacement. Additional cars/buses will add further deterioration of the roads and bridges.

Please study emergency plans. In my neighborhood of Magnolia, there are few entry and exit points. In a major disaster, residents will be stranded.

Please study the loss of current affordable housing options due to removal of older, affordable dwellings in order to maximize return on investment.

Please study the effect of market forces on land and home values leading to inflation of home values creating less affordable options for all.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Christina Ellis**

10/30/2017 9:41

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I live in Wallingford and I am trying to build a backyard cottage for some friends who are being priced out of the city. These things listed below would help make the process easier for people like me!

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock

about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Scott Alspach**

10/30/2017 10:36

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My name is Scott Alspach and I'm writing to support the construction of more AADUs and DADUs in Seattle. Just last week the sale of my apartment building was covered in the Seattle Weekly where investors were quoted as seeking rent increases of 15%. My building has many elderly long term residents who may not be able to afford this increase. The lack of housing options in Seattle's Single Family Zones is causing our rent to rise and depriving us of other housing options.

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new

opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Donn Cave

10/30/2017 10:45

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

Issues raised in the SEPA appeal, and in particular I refer to points 9, 10 and 11 of the Hearing Examiner's Decision, call for another Alternative in order to clearly assess impacts. One of the Alternatives should omit the two regulatory changes that the appellants successfully argued could "alter the economic environment for development": owner occupancy, and the number of accessory units per lot. This would facilitate separate examination of the impact of these two changes, changes that were found to have the potential for "conversion of single-family equity asset property into income property" and hence particularly critical to production and impact - while arguably doing little for the typical homeowner considering an accessory unit.

## Michael Richards

10/30/2017 11:03

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes! 1) The adverse impacts of spillover parking from Urban Villages into single family residential neighborhoods is significant. Many neighborhoods are already at capacity. Adding additional cars to on-street parking, when there really is none available, has a very adverse impact on the livability of neighborhoods! Homeowners are more likely to need cars: more likely to have families and transport kids to activities inaccessible by bus; everybody doesn't work downtown!; unavailable parking discriminates against older residents, disabled residents, fails to consider the many hills and steep grades in the city, frequent adverse weather conditions, etc.. New buildings should be required to provide parking consistent with the number of anticipated residents with cars! It is stressful to all not to have available parking.

2) ADUs and DADUs need to a) have owner occupancy, b) provide parking, c) be limited in size, d) have significant setbacks from adjoining property, and e) have DADUs only on very large lots. In other words, there should be no change from the current regulations on DADUs

#### **Do you have other comments or suggestions related to the scope of the EIS?**

Yes! The 2 promotional shows scheduled for the so called "Scoping Meetings" are totally inadequate! They were nothing more than a marketing effort to sell a combined program of HALA, MHA, Amendments to a Comprehensive Plan, and OBrian's ADU proposal. The "scope" of the meetings was far too broad and did nothing to encourage public comment other than hand out forms. Topics were too many and too broad. The process should first allow for education of the public regarding what the issues are - then followup later with opportunities for transparent comment and dialogue. I felt these meetings clearly had a pre-determined agenda and outcome! The one I attended had overwhelming opposition to both the Amendments and the new program for ADU/DADUs

## Tonya Ricks Sterr

10/30/2017 11:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I want to see more density and fewer barriers to building great ADUs/DADUs. Building restrictions on DADUs in particular are egregious and need to be lessened.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 is the only sustainable option. Please choose Alternative 2. My next-door neighbors have an ADU and my behind-my-house neighbors have a DADU and it's GREAT. Our not-very-dense neighborhood needs more folks living there.

## Freya Johnson

10/30/2017 12:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the height limit relaxed. It is difficult to reach the allowed square footage on most lots with the current story and a half + dormer size limitations. These structures have an incredibly high cost/sf, which is eased with some economy of scale.

It would be great to see additional easing on lot size and coverage for lots in general but especially in urban villages and near areas of zoning that allow greater density.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Don't back down. We are in desperate need of additional density and economic diversity in our neighborhoods. Arguments on the other side boil down to entitlement mentality, irrational fears of diversity/change and other prejudices. Everyone should have access to housing in wonderful neighborhoods, with great schools and transit options regardless of their income.

## Patricia Simon

10/30/2017 17:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

NO

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am not in favor of any changes to the current law, particularly I oppose eliminating the requirement for off-street parking and owner occupation. Parking is already a huge issue and is getting worse and worse. To eliminate the parking requirement would exacerbate the situation beyond remedy. Likewise, eliminating the owner occupancy requirement would provide an incentive for larger entities buying up single family homes and using them as de facto hotels and/or transient housing. I oppose any changes for these reasons.

## Paul Chapman

10/30/2017 17:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

In addition to my previous scoping comments, please also include in this scope a study of replacing the zoning of all single family lots with RSL. This will allow more small-scale development across Seattle and provide landowners additional options for developing more affordable housing.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Brandon J. Kelly**

10/30/2017 19:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Increasing the DADU base height limit to 20' (not 16')

**Do you have other comments or suggestions related to the scope of the EIS?**

**Mark Stoner**

10/30/2017 19:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see a study of allowing ADUs on even smaller lots, potentially 2800 or 3000 square feet. There are plenty of people who are happy living in small houses, two of which can certainly be fit onto lots smaller than the proposed minimum lot size of 3200 square feet.

**Do you have other comments or suggestions related to the scope of the EIS?**

The list of topics looks very thorough to me. I really just want more lots to be eligible for the creation of ADUs, especially since the most central, walkable lots are often very small.

**Michael Ruffo**

10/30/2017 20:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

No. Just want to express my support and that I do not feel that there are any potential significant adverse environmental impacts

**Robert Heller**

10/30/2017 20:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS must address whether removal of the owner-occupancy requirement, especially, could result in increased property values, which could have the effect of increasing housing costs. The City has heard feedback that the owner-occupancy requirement is an "impediment" for non-owner-occupants who wish to buy properties in order to create ADUs. There is clearly demand from such non-owner-occupants who wish to invest in Seattle properties for that purpose. The EIS must study what effects on property values and housing costs (both purchase cost

and rental rates) may result from increasing the universe of potential buyers for single-family zoned residential property. The economics of the proposal, as affecting the motivation of real estate investors, must be thoroughly investigated. Special attention should be given potential impacts on property values and housing costs in areas of the City which are currently lower-income areas. Potential for demolition and redevelopment of properties that now contain smaller, lower cost homes must be examined.

**Do you have other comments or suggestions related to the scope of the EIS?**

Various studies on urban issues have addressed owner-occupancy as related to property maintenance, civic involvement, neighborhood cohesion, and other factors. Since the proposed action has potential to alter owner-occupancy rates, the EIS should survey the literature on this issue and also determine if the experiences of other cities may identify impacts related to changes in owner-occupancy.

**Rosalie Volpone**

10/30/2017 21:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

no

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes. I am not in favor of any changes to the current law, particularly I oppose eliminating the requirement for off-street parking and owner occupation. Parking is already a huge issue and is getting worse and worse. To eliminate the parking requirement would exacerbate the situation beyond remedy. Likewise, eliminating the owner occupancy requirement would provide an incentive for larger entities buying up single family homes and using them as de facto hotels and/or transient housing. I oppose any changes for these reasons.

**Barbara Bulzomi**

10/30/2017 22:31

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I am not in favor of any changes to the current law, particularly I oppose eliminating the requirement for off-street parking and owner occupation. Parking is already a huge issue and is getting worse and worse. To eliminate the parking requirement would exacerbate the situation beyond remedy. Likewise, eliminating the owner occupancy requirement would provide an incentive for larger entities buying up single family homes and using them as de facto hotels and/or transient housing. I oppose any changes for these reasons.

**Patrick Taylor**

10/30/2017 22:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The impact on affordability, green house gas emissions, sprawl, etc of not allowing additional housing

**Do you have other comments or suggestions related to the scope of the EIS?**

**Antoine McNamara**

10/30/2017 23:37

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allowing duplexes and triplexes in single family zones

**Do you have other comments or suggestions related to the scope of the EIS?**

**Midori Sumida**

10/31/2017 0:14

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am very concerned that the city will lift the requirements that the property owner of an accessory dwelling live on the premises. The last thing we need is for absentee owners to build these dwellings and have zero accountability to the others in the neighborhood other than complaining to the city's Department of Construction and Inspections. I am also concerned that the city will change the restrictions as a way to bypass single-family zoning by erecting structures that exceed the limitations that currently exist. We live in these neighborhoods that you want to change. Stop cloaking changes under the guise of increasing the lot of "affordable housing." It's a ruse and a facade. Single-family zoning is not the great Satan that some politicians and bureaucrats allege. Wanting to maintain the character of your neighborhood and community is not a crime. This attempt to obtain public comment drew the attention of those most interested in changing it: developers and housing advocates. The pretense to be interested and responsive in what people like me have to say is irksome.

**Do you have other comments or suggestions related to the scope of the EIS?**

1. Maintain the requirement that the property owner live on the premises of an accessory dwelling unit.
2. Do not increase the size to the structures such that they are full-sized homes masquerading as accessory dwelling units.

**Sandro Gvelesiani**

10/31/2017 8:51

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

As a homeowner, I support this measure.

**Lisa McNelis**

10/31/2017 9:14

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I agree with all the proposed changes except for the owner on site requirement. I think the owner should live on

the property. Also I'm not sure if there is an option for condominium sale of the units but I don't think that should be allowed. I think they should be allowed as rental only.

## Sheri Newbold

10/31/2017 10:23

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Part of the study of Alt 1 No Action should be how it creates the lack of choice in type of housing within Seattle and that impact. Also, study if Alt 1 No Action causes people to live outside Seattle and commute in and the related impacts of that.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The zones ought to be renamed. By calling the SF zones "single family" zones, it sets up an expectation that these areas will always be single family housing only. Other jurisdictions call the residential zones R-, and we ought to do the same in Seattle. IE the zone name is not a typology.

## Jody

10/31/2017 10:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I do not support this change. Seattle is famous for the charm of all of it's various neighborhoods which this will greatly alter. Please find other alternatives. We don't want this kind of change. Please do not go forward with this.

## Gus Catalano

10/31/2017 11:06

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please increase the Lot coverage limit. In many older homes in small lots that are one-floor the current lot coverage limit doesn't allow me to create a DADU that is big enough to be worthwhile. I'd have about 300sq ft to play with in my 4300sq ft lot with a house of about 1300sq ft (small ranch house), which is challenging.

Ideally I would make a garage with a DADU on top, and 300 sq ft is quite challenging to do this with.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Please have pre-approved DADU plans for small lots with garages in the first floor

## Jonathan Taylor

10/31/2017 11:10

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Land coverage ratio needs to be extended as well to at least match neighbouring districts (40+%). Otherwise looks good.

**Do you have other comments or suggestions related to the scope of the EIS?**

This initiative has my full support. We need to densify Seattle/King County; it's both environmentally sound and helpful for all communities.

**Ann Mueller**

10/31/2017 11:13

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Review impact of increased impervious surface and heat islands, removal of vegetation.

Impact of eliminating off- street parking especially if the existing SFR doesn't have off street parking.

Impact of speculative development where investors buy a SFR and add a AADU and/or DADU. What will ensure these are affordable? When owner occupancy is required there is some oversight of the renters and any impacts as well as better maintenance of rental units.

Impact on views and solar access. What is the justification of allowing increased heights?

Survey should be required and verification that the existing house is conforming.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Charles Pautz**

10/31/2017 11:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1.impervious lot coverage % and rainwater run-off mitigation.

2. If owners are not required to live on site, this will open the door for speculative development and the subsequent degrading of neighborhood character and community. This will reduce the quality of life for all residents, increase crime, traffic and parking congestion.

**Do you have other comments or suggestions related to the scope of the EIS?**

effect of on street parking- allowing alternative 2, allowing 12 unrelated people on 1 lot and no off-street parking will render street parking impossible.

**Mary Ellen Russell**

10/31/2017 11:18

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please also consider allowing larger DADU footprints. It seems unfair that DADU size is so tightly restricted regardless of the size of the existing house. It would make sense to allow DADU's with larger footprint sizes as long as the total lot coverage is kept below the required threshold. Also, one of the most pressing needs that Seattle has is affordable housing for FAMILIES. Allowing DADU's with a maximum 400 SF footprint does not do anything to address this issue. Larger DADU sizes could also help families stay in the city by allowing older residents to retire to a backyard cottage. This would be a more appealing and feasible option if the size of the backyard cottage was not so severely restricted. Many seniors need a living space all on one floor, and 400 SF is extremely petite for

that.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am very hopeful that the parking requirement will be loosened or eliminated. More and more people are using car sharing, biking, and buses rather than cars. With new light rail lines soon opening, it makes sense to start planning for a future of fewer cars, rather than setting aside so much space for storing vehicles.

## **Myra Lara**

10/31/2017 11:20

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I want to see addressed in the EIS a genuine consider more urban models of living versus suburban. Just looking at old lots compared to newer lots in Seattle proper, form and setbacks weren't as constrained or antiurban as they are now. Second, taking a strong equity approach is what we need to do as we move into a new phase in American city life: reverse white flight, globalization, and increasing income inequality. Lastly, framing this research around co-op living, multifamily/intergenerational parcels would help Seattle move into the future. I think this is also a way to incentivize infill development with "small" developers and owners versus corporate developers and out of state interests.

### **Do you have other comments or suggestions related to the scope of the EIS?**

MAIN GOAL: promote multifamily living in 70% of the land by increasing ownership opportunities and community-led development. Because the typical house is stick-frame construction, it is way more accessible both in labor and cost.

1. Waive permit fees for 2-5 years for AADU and ADU much like Portland. This opens up the opportunity to build with middle income folks.
2. Words matter and shape our conscious/subconscious words whether we like it or not. Change zone name from single family to residential: just looking at craigslist and facebook postings alone, one notices that it's not just "single families" living here, but friends, perfect strangers, couples, and did I say friends.
3. Green Building incentives are rad.
4. Allow residential small lot by default everywhere. If this sounds scary, how about re-legalizing duplexes and triplexes instead. I live near a lot of them in North Capitol Hill. Guess what? They look like really big housy-houses. RE-LEGALIZE THEM.
5. DADUs are already pretty small, so it makes no sense to apply typical residential code to it. Give it its own. Hire some computer science majors to make you a model of what all these parameters look like... that's all what building code is anyway: parameters.
6. DOUBLE OWNERSHIP. This is key to everything here. Did you know that 40-50% of all generations (millennials, genX, even boomers!) are rent burdened and can't even entertain the idea of ever buying? Because DADUs are way smaller than your average house, the price comes down. Imagine finally opening up 70% of the city to those shut out. DO. THIS.
7. Work with local credit unions (ideally a municipal/state bank) for construction loans. Find ways to incentivize community led development towards community ownership.
8. Whatever you do, DO NOT. LET. THESE. GO. UNDER. DESIGN. REVIEW. Residential zones already enjoy

being able to do what they want, however they want - it's the renter-majority/commercial zones that get this HOA-like nannying. I realize this was made to improve design, but it hasn't at all. Departures requested and granted can sometimes be dangerous (why are we granting exceptions with sight triangles, for example?!) and are never bold. If anything, they are to give the developer more rentable square footage, which furthers our distrust.

## Kim Retherford

10/31/2017 11:32

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

While I am for Alternative 2, I think there should be restrictions on opening DADUs to Airbnb. I agree that home owners should not have to occupy the unit, but these regulations should promote long term rentals to help with affordable housing.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Quan Johnson

10/31/2017 11:35

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

How to mitigate waste from additional residents and structures so that they won't over-stress waste management systems or create waste.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I'm in favor of Alternative 2

## Sam Winklebleck

10/31/2017 11:36

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I think Alternative #2 represents the best solution, but I would like to see some additional incentive to use DADU/AADU for long-term rentals as opposed to short term rentals.

## Lucas Roth

10/31/2017 11:51

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Make sure you study how much emissions would be avoided by people living closer to their work (and not driving our congested highways/streets)

### **Do you have other comments or suggestions related to the scope of the EIS?**

The main problem people have is ensuring street parking for existing single family neighborhoods. All of the suggestions are reasonable in my opinion but the natural compromise is to require an off-street spot for each ADU and keep the other suggestions intact. If that is provided then nearby homeowners' only gripe could be that they simply don't want more people living near them-- hardly a compelling argument in a city where housing costs are

skyrocketing and displacing so many.

## Kristi Johnson

10/31/2017 11:56

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My husband and I built an ADU. It's great, but the sewer capacity charge added to the cost significantly. Since multifamily SCC's are higher than a SFR, I'd like to see ADU SCC's lower than a SFR. A 1 bedroom 5-600sf home does not put the same load on the sewer and thus should not be charged the same as a full Single Family Residence.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Chuck Flaherty

10/31/2017 11:57

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

While the EIS general statement addresses the topic of vegetation and it's potential loss, neither proposed alternative specifically details anything relating to loss of trees or woody shrubs which exert the largest passive environmental impact on our air quality as well as substantial effects on water quality and run-off, heat/cooling mitigation, pressure on wildlife and other environmental impacts. Hopefully the specific rule making process will address these issues more thoroughly than either of the alternatives.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Include specific restrictions relating to loss of biome or remediation to replace biome in kind on the property in question, e.g., replace equivalent tree caliper size, replace destroyed plant material with equivalent material post-construction to lessen air, water, heat/cooling and wildlife habitat effects.

## red bike

10/31/2017 11:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

As a former resident of Seattle who was tired of paying \$1700/mo for a garbage apartment, I feel that ADUs are a very positive way to create more affordable housing in a comfortable setting. Seattle has been slow to adapt to new forms of alternative housing and we should strive to open more pathways to accommodate an already dense city that is continuing to grow rapidly. (ie. Portland and B.C Vancouver)

### **Do you have other comments or suggestions related to the scope of the EIS?**

I generally side with alternative 2 and hope to see many more ADUs.

## Jacob lee

10/31/2017 12:01

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I've lived in the city for \*only\* 3 years now, and have rented in the same place the whole time. I look forward to

buying in my current neighborhood, and settling in long-term, but current house prices prevent me from being able to do so. The more housing supply we have in the city, the lower rents & prices will become.

It's unrealistic for people to expect both affordable homes, and "i can retire if i sell my house" prices 40 years later. It's unrealistic for people to think they can have their 5000 sf or quarter acre plot anywhere within half an hour of downtown.

Seattle is becoming a world-class city, and part of that is densifying! We need people of all income levels living in all parts of this city. The more income levels, age levels, and other forms of diversity in a resident population, the healthier a neighborhood is. The more variety in housing stock, building age, unit type, the healthier a neighborhood is.

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC).

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

## Yani Maryani

10/31/2017 12:04

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

n/a

**Do you have other comments or suggestions related to the scope of the EIS?**

No owner occupancy requirement is the most that we'd like to see implemented. This will give flexibility for the home owner to move out in the event of job transfer and still maintain the ADE/DADU.

## Geoff Piper

10/31/2017 13:08

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No. Please proceed as quickly as possible.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am a wholehearted supporter of ADU's and DADU's and fully support option 2 in the listed alternatives.

## Erin Sanders

10/31/2017 13:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, off-street parking and traffic impacts.

**Do you have other comments or suggestions related to the scope of the EIS?**

Our neighborhood streets are getting more and more crowded and narrower. Many neighborhoods can no longer accommodate two cars going in opposite directions at the same time. Visibility is greatly reduced. Pedestrians on sidewalk corners cannot be seen. Visibility while going around corners and merging into oncoming traffic is reduced. Waiting for "gaps" to merge into traffic has become longer and longer. People can't even park in front of their own home there is so much congestion. How does removing the necessity to provide off street parking helping this problem?

## Janice Marie Nyman

10/31/2017 13:54

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Right now, I'm not in favor of permitting DADU's that are not associated with family properties. I feel it will create too much land speculation, and reduce our landscapes and quantities of big trees. I'd love to see included in the study an alternative that tries to even out growth by accommodating it in different forms: 1. The creation of business hubs in other areas of WA (Spokane, Olympia, Cle Elum, Ritzville etc.) . 2. Taller structures in Seattle's "gateway" commercial zones with excellent transportation, and little congestion. 3. Modest DADU growth, where it can occur without adding to transportation issues, loss of significant greenspace.

4. Renovation of large homes to duplex properties.

5. Perhaps it exists already and you can point me to it:

We need a DENSITY MAP of Washington, that shows some detail. This map can serve as a means of locating areas that have, or can easily have sufficient transportation. It can show us also places with low occupancy, lots of space, old buildings, under-utilized areas to meet our density challenges.

5. A look at big business-How would our density be affected if Microsoft, Amazon, etc. were split into 3-4 companies? Would that improve the economy over the entire US? Would it spread out wealth and density challenges and also enable new small business's to get a foothold?

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Buzz Tenenbom AIA

10/31/2017 14:07

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) I'd like to see the IMPACT of a DADU on LIGHT - in the rear yard, bulk of a house and a DADU (plus the neighbors' house and DADU) creates unusable rear yards, a beer can space or dog poop space if you will, between the main house and the DADU, which will be often in year around shade due to the DADU and the main house; light in light-starved Seattle is a premium and big bulk of buildings eliminate/block light;

2) DADU's are expensive; we never see them coming in below \$300K. So the rent on these will be high. A mortgage of \$300K at 4.5% plus insurance is around \$1200/month. And this includes \$0.00 profit for the owner. With a modest profit owners would have to charge \$1500/month!

-- 1a) Study the impact of high rents solving the housing problem. Does this really work? What is the population that can afford these?

-- 1b) Study the impact of people actually building DADUs if they would make little to no profit, yet with a big outlay of cash. Don't codify it if it won't get done.

3) Study the likelihood and impact of developers buying out homeowners if no owner residency is required, and then building triplexes on single family lots. This becomes a city/neighborhood like Cambridge, MA or Jamaica Plain in Boston. Is this what we want to see for Seattle?

4) Study whether prices are going up, staying level, or going down in other cities with DADUs, e.g. Portland OR and Vancouver BC. This will portend what will happen in Seattle.

5) Compare how developing denser urban villages will compare to increasing density versus DADU's in existing neighborhoods. Transit exists there as do services.

**Do you have other comments or suggestions related to the scope of the EIS?**

1) It is important to study how other cities have dealt with density, Copenhagen for example. Don't re-invent the wheel.

2) And it's important to scientifically/statistically determine whether DADU's in Portland, OR or in Vancouver, BC are or are not successful (there's lots of differing statements floating around! -- what's the truth?).

3) Most of this is hearsay, as to whether DADU's will actually help solve the housing problem. Hire an Urban Design firm, bring professionals on board, who can study the situation and make recommendations.

4) It is quite likely an improved train transit system would create other housing nodes region-wide that would be a better way to solve the housing problem than densify existing single family in-city neighborhoods -- think regionally!

5) Regarding the MHA -- There are a number of neighborhoods that are not slated for increased density, e.g. Magnolia. Transit reasons are not good enough reasons as transit can be increased! This sounds like some neighborhoods are getting preferential treatment. Is this politically motivated?

**David Messent**

10/31/2017 14:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I favor alternative 2. Seattle needs more density and the revisions outlined make ADUs more attractive to homeowners.

**Kyle Brooks**

10/31/2017 14:49

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

The EIS must consider environmental impacts in the world at large. Housing density reduces carbon consumption and reduces suburban sprawl.

**K Kinchen**

10/31/2017 14:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

You need to calculate that building more densely in established residential areas relieves pressure on outer-ring suburbs to expand in undeveloped areas. Ditto for parking requirements: we know that making parking too easy,

free, or cheap induces demand, and that has an environmental impact. In short, "EI" is not just whether a homeowner can park in front of their house or share their neighborhood with more people, it's how blocking infill development cumulatively contributes to worse overall conditions away from the immediate area.

## Sarajane Siegfriedt

10/31/2017 15:04

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

There is no rationale for raising the limit of \*unrelated\* individuals on the property from 8 to 12, not counting related family members. Even in a large house and two 1,000 s.ft apartments, this is asking for trouble. What is driving this request???

### **Do you have other comments or suggestions related to the scope of the EIS?**

The impacts and alternative for mother-in-law apartments (no change to utilities, lot coverage, footprint) are so different that they must be presented as a separate scoping alternative from backyard cottages. Mother-in-law apartments are not mother-in-law apartments without a homeownership requirement. It is this requirement that makes them naturally affordable, because homeowners are reluctant to raise rents unreasonable for fear of forcing out a trustworthy tenant. When someone shares your house, trust is far more important than chasing the last dollar of rent.

## Stephanie

10/31/2017 15:46

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Happiness Index or some metric taken into consideration. Allowing families to age in place, have additional income so 1 family member can work less- these do have an impact on happiness. I've never seen this type of metric in an EIS and I think it may be something to consider.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The extra costs for hooking up to current sewer line is really expensive. What about a sewer connection fee that is more appropriate for the cost of treating the 1 to 2 added toilets? Could that get handled from a SPU fee similar to what current residents see on their utility bill? encouraging greenroofs, cisterns and green infrastructure could be leverage through the RainWise program.

## Joseph Giampietro

10/31/2017 15:52

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

Yes:

1) Change to Height limits should better reflect the garage heights that are practical for Overhead Doors at the garage entry. Suggestion: please allow the height for 40 foot wide lots to be the same as those for over 50 feet wide. This will allow for a slightly taller and more usable garage level.

2) Ideally, the DADU lot should be allowed to be subdivided so that the occupant of the Backyard Cottage can also

own and establish a meaningful basis of future proofing the cost of housing. This also allows for equity improvement over time.

3) All of the proposed changes are reasonable and I recommend approval of all, as specifically noted:

a) allow both an ADU and a DADU on the same lot since the ADU will essentially be invisible to the neighborhood, and increased density will allow for diversity, affordability and transit improvement.

b) remove the parking requirement = lower cost & more units

c) owner occupancy should be removed as a requirement

d) reduce the minimum lot size to 3200sf.

e) allow 1000sf for each ADU and DADU not including garage or storage

f) Increase the height limit to allow for reasonable and comfortable interior rooms at both the lower level garage and the upper level living area.

g) all the other proposed changes as well.

Thank you!

Joe Giampietro, AIA, CPHC

(206)618-1545

## Michael Herschensohn

10/31/2017 15:52

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. The scope of the EIS does not evaluate the impact of these changes on the historic fabric of neighborhoods. While the historic preservation section of the EIS normally addresses the protection of city, state or federal landmarks, the Land Use, Housing & Socioeconomics and Aesthetics topic areas should be scoped to evaluate potential historic districts, local and national historic districts and the preservation of our neighborhoods historic built environment.

### **Do you have other comments or suggestions related to the scope of the EIS?**

No.

## Gregory Quetin

10/31/2017 16:01

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please take into account the costs of not allowing for more housing in our city. Single family homes are a luxury, having so much of the city limited to them is ultimately bad for a financially, environmentally, and culturally vibrant city.

**Do you have other comments or suggestions related to the scope of the EIS?**

Allow ADUs, allow more housing. Plan for a future city of less driving and more biking and walking.

**John Hornbirook**

10/31/2017 16:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I prefer option 2 - More units will help provide the housing we need and keep rental rates in check

**Andrew Abernathy**

10/31/2017 18:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm a homeowner in Magnolia in favor of alternative 2. While I agree that there is an important role for the city regarding housing restrictions, these proposed changes seem reasonable to me. We are a large and growing city and while I love a quiet neighborhood and large open spaces, I think these are reasonable extensions to what homeowners could do to slow the housing crush.

**Shaula Massena**

10/31/2017 18:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Grocery & transit access should mitigate parking issues, if DADU occupants have a realistic probability of being able to be car free. Perhaps a minimum walk score of 70?

**Do you have other comments or suggestions related to the scope of the EIS?**

I like human-scale density, vs highrises, and the interleaving of nature that happens in neighborhoods.

**Betsy Braun**

10/31/2017 19:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I could not see the EIS - the link in the previous webpage is broken. Apologies if you have addressed these issues already in the current document. I would like you to project the trending in transit ridership and alternative ridership like bike shares, uber, carpools and walking, and investigate the true net impact ADU's would have to traffic. I suspect as we abandon our cars in droves for other modes that the impact of ADU's on our existing traffic and parking is insignificant. We should not require an off-street parking space if it is not warranted - it adds huge cost and complexity to the requirements for building a successful ADU.

I also would like you to investigate the impacts requiring separate utilities hookups for the ADUs has on the utility

capacities. As we reduce our average # of people per household, (5 bedroom house with 2 people living in it, not 7) the actual net demand on our utilities infrastructure per dwelling continues to decrease. Providing separate hookups, and not allowing the dwelling to piggyback off the existing house's water, sewer, gas, electric and storm system places a huge financial burden on the viability of the ADUs. Please allow the owners to piggyback these utilities off the existing property if the existing utilities have appropriate capacity and come up with some sort of reasonable rent to cover them, to keep these units affordable.

I also would like you to do a serious evaluation of a couple of existing blocks in a neighborhood like mine. As I walk mentally through my neighborhood, I think every other house has an ADU or DADU already. The amount of net capacity that could be added may not be as big as you think. Has there been a representative sampling of some typical neighborhoods to determine how many ADU's could feasibly be built? I have virtually no yard, nor do many of my neighbors. The concerns raised about a horde of new ADU's may not meet the reality of the number of places they could be sited. Please take into consideration how many would be the maximum number of units that could be built and some sort of rationale as to how many might be built each year, to more fully understand the likely development trajectory over time.

We can and should easily absorb the capacity, and improve the diversity of the housing options in our neighborhoods. Too much of our land is locked up in single family zoning - we need to increase density in the urban cores. This is a great way to do so.

Thank you for your consideration -

Betsy Braun - Green Lake Resident since 1981

**Do you have other comments or suggestions related to the scope of the EIS?**

Thanks for taking this important growth strategy on!!!

**Bob D.**

10/31/2017 20:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow a maximum of two ADUs in single family zones. Because of different existing building types, allow either two AADUs or two DADUs or one AADU and one DADU. This has the advantage of making it economically attractive for owners to provide the additional ADUs. For example, a non-conforming triplex in a single family zone, might readily and at minimal cost be converted to single family home with two legal AADUs. This will help to keep rents down because the owner won't have as much capital cost to recover.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Chris Erickson**

10/31/2017 20:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

How about an additional alternative between 1 and 2, where you maintain all of the original rules, EXCEPT to drop the parking and residency requirement for ADU's/DADU.

**Do you have other comments or suggestions related to the scope of the EIS?**

Add another alternative as described above. If this cannot be added I would support alternative 2.

## Anne Shields

10/31/2017 20:28

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I strongly support the proposed changes that will allow additional square footage, additional height, more leniency in entrance location, and removing the inclusion of garage/storage space in counted square footage.

These changes will increase the chance that I am able to remain in my home of 20+ years upon retirement. I am a single mother in south Seattle who has managed to hold onto my own home, raised kids alone while working full time - but must count on generating income from my investment in my home to be able to retire eventually. I don't want to be forced to move from Seattle - away from my family and friends - but I have to find more retirement income options. A DADU on my property will allow me to stay put in Seattle, where I wish to remain.

Every month I get letters and offers from developers who would tear down my home and garage and very likely build more units on it that I would ever consider or that others in my neighborhood would find desirable. The current restrictions encourage people like me to sell to developers because we see few good alternatives as we grow older.

I am not opposed to new restrictions on how often a DADU can be placed in AirBnB rental; I think that preserves longer term rentals. That has been an acceptable rent control strategy in some cities.

## Michael J. Bondra

10/31/2017 22:34

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see the EIS extended to cover a third alternative whereby all SF lots are rezoned to RSL.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Denise Derr

10/31/2017 22:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) Fair and Accurate Representations

Is the city misleading the general public when communications describe larger triplex buildings in SFZ as "small secondary units"?

2) Quality of the Data

Was the city's small survey to identify "barriers to construction" biased or arbitrary?

3) Financial Bias

To what extent is the city commoditizing SFZ in opposition to homeowner right to private use?

#### 4) Alternative Approaches

Are there other incentives to ADU development using existing zoning?

#### 5) Destabilizing Development

What is the psychological impact on residents who's neighborhood radically change?

#### **Do you have other comments or suggestions related to the scope of the EIS?**

Does this action infringe on citizens private property rights?

What does "family friendly" mean?

What is positive for some maybe negative for another, who decides?

Why not have more demographic information on those who submit comments?

### **marjorie rhodes**

11/1/2017 0:38

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes! A front yard and back yard are open spaces. If you allow these open spaces to be filled in with houses then you are damaging the environment.

And this increased density will also result in more tree loss. Seattle has already lost most of its tree covering in just the past few decades.

#### **Do you have other comments or suggestions related to the scope of the EIS?**

In the 50's the government destroyed 10,000 single family homes inside Seattle to build the freeway here, forcing people out into the suburbs. Now the government doesn't want people in the suburbs. Make up your minds.

Overpopulation is the problem and nothing short of a reduction in population size can solve the problem. There is no use in trying to deal with the effects of a problem while deliberately ignoring the cause. Urban density vs. suburban sprawl has no real solution other than a decrease in the population.

Meanwhile, please keep in mind that people live in cities and cities need a good environment too. Density is bad for the urban environment where people live. As for long commutes? Start taxing employers who hire people who live outside the city. And the government should also hire only local folks. This will minimize commutes from the suburbs. If people are going to live in the suburbs then put some jobs out there.

### **Ron Hess**

11/1/2017 8:22

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

One of the most important barriers for the construction of affordable housing in Seattle is the almost impenetrable layers of the building / zoning / permitting process and the high cost of the permits and experts needed. The lack of new ADU's actually built over the past decade is testimony to the structural impediments already in place.

Attempting to jump start the process by cutting parking, increasing the number of units and unrelated persons allowed while ending the need for an owner to live on the property will simply not work if the purpose is for increasing affordable housing in SFZs.

Trying to retrofit a new DADU or ADU into an existing lot w/house is extremely difficult and costly, perhaps explaining why so few are actually built. In my opinion, if the full of range of proposals is passed, most new units will be built by developers after buying small homes on large lots in neighborhoods like Arbor Heights that were built with no sidewalks and curbs. These lots will become large, unwieldy tri-plexes with very negative effects on the nearby neighbors.

The fact is: The building process has become a vast industry of experts, consultants, engineers and inspectors, all with their hands out for large fees. It is impossible to build reasonably priced housing under these conditions and rearranging a few details will not matter against the overwhelming economics of our booming economy.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Chelsea**

11/1/2017 8:43

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Can we incorporate affordable housing/rental incentives into this EIS?

**Do you have other comments or suggestions related to the scope of the EIS?**

I fully support these changes- especially the removal of the on-site parking requirements, and adding lot coverage, additional height options for dormers, and a slightly larger DADU. Thanks!

**Jalair Box**

11/1/2017 9:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Sewer capacity study for expanded ADU/DADUs and tree/green cover to compliment the Urban Forest Stewardship Plan. fee to mitigation/planting fund or planting on-site.

<http://www.seattle.gov/environment/trees-and-green-space/urban-forest-stewardship-plan>.

**Do you have other comments or suggestions related to the scope of the EIS?**

I have a comment about the public participation component of the EIS. I have given CM Mike O'Brien feedback regarding the first iteration of the legislation. My feedback was the public participation was insufficient, in that there were only two public meetings, one in South Seattle and one in North Seattle. With respect to the EIS public participation process, this whole thing will go better if the City invested in a wider set of meetings to air the disagreements among citizens about this particular land use. Most people still do not understand the scope of the changes. I understand a "pro-urban" group is seizing the opportunity to expand the scope of the EIS even further. Okay, if that happens we the public need a 1) longer time-frame to absorb what is being discussed, and 2) multiple opportunities to feedback into the process. I'm pro ADU/DADU, if it is done well. It's so important to involve all the people in this process. Think about much wider channels of communication. Thanks.

## Michael Maddux

11/1/2017 9:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Nope. There is no more time for dithering.

### **Do you have other comments or suggestions related to the scope of the EIS?**

This is a phenomenal first step toward creating more affordable and healthy communities for moderate and low-income families. Low-impact density changes will ensure more families can live near great schools and parks throughout the city. Allowing more ADUs and DADUs not only means more affordable homes for young families, but also will make multi-generational housing a more realistic option for families who want to live together - but maybe have different doors to their space. Further, for people seeking to age-in-place, this affords a way to help ensure stability of income, and build community.

Additional steps should be considered by the city on how to help folks actually fund and convert/construct ADUs and DADUs, but for the purposes here, this is a necessary beginning to improving affordability and ensuring we have a welcoming city!

## Matthew Hagen

11/1/2017 9:37

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No - Alternative 2 is a great solution for Seattle.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Alternative 2 is a thoughtful approach to increasing density for the city. Removing the parking requirement would aid the development for these units based on my past experience of trying to get an ADU constructed.

## Barbara Kiley

11/1/2017 10:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Before we consider increasing Seattle density, we should first repair and increase capacity of City sewage treatment and roadways!

### **Do you have other comments or suggestions related to the scope of the EIS?**

Before we consider increasing Seattle density, we should first repair and increase capacity of City sewage treatment and roadways!

## M McCauley

11/1/2017 10:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

nope

**Do you have other comments or suggestions related to the scope of the EIS?**

Option 2 looks better. As a licensed professional environmental engineer, I spend my time working on ways to lessen environmental impacts. The environmental benefits of increased density in existing urban areas vastly outweigh the costs. The EIS work done to date is sufficient. We should skip any car parking requirements. Housing for people is important. Mobility and equity are impaired by car dependence.

**David Stitzhal**

11/1/2017 10:44

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Greetings. I would like to see the elimination of off-street parking requirements for ADUs and backyard cottages. Additionally, the EIS should include examination of how the proposed changes will affect housing supply, the promotion of walkable neighborhoods and other non-car transportation modes, and greenhouse gas emissions. Thanks for your time.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Matt Mitchell**

11/1/2017 10:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes. I support ADUs as they're currently zoned as a sensible way to create more housing, or allow extended family to live together as older relatives age. But, the easing of so many requirements (as is being proposed) seems excessive and like a huge overreach. Allowing the addition of two units instead of just one, as well as letting the main unit be no longer occupied by the owner/rented as well seems like a backdoor up zone of all of the city's single family neighborhoods. It certainly goes against the original idea and intention in creating ADUs. I am opposed to the allowance of two separate units, but especially opposed and concerned about the removal of the requirement that the main unit be owner occupied. This is effectively allowing triplexes on all lots currently zoned for single family housing.

**Bruce Meyers**

11/1/2017 10:58

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Lack of sewage treatment capacity for West point treatment plant. Increased runoff, need to get rid of combined sewage and storm water pipes in Ballard.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Angela Compton**

11/1/2017 11:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

More and more people are moving here every day. The neighborhoods with high walkability and transit access are the most highly desired for both convenience and ability to provide a healthy lifestyle. Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into these neighborhoods; especially where zones single-family. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage and create healthier living options for more people.

**Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay.

Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this

would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Thomas De Maria

11/1/2017 13:26

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No, I would like to say, as a single family home owner, please push forward Alternative 2. The additional requirements for homeowners to live on-site and also provide off street parking is antiquated thinking; it is virtually impossible for the city to support itself financially in 25 years with present land-use codes protecting SFR zoning at such a high percentage, unless you only wish to have wealthy homeowners supporting a limited tax base. Let's grow up and be a city, the SFR zones need to change for more inclusive housing, whether rentals or changing to LR-1/LR-2 to bring in more units.

### **Do you have other comments or suggestions related to the scope of the EIS?**

As a single family home owner, please push forward Alternative 2. The additional requirements for homeowners to live on-site and also provide off street parking is antiquated thinking; it is virtually impossible for the city to support itself financially in 25 years with present land-use codes protecting SFR zoning at such a high percentage, unless you only wish to have wealthy homeowners supporting a limited tax base. Let's grow up and be a city, the SFR zones need to change for more inclusive housing, whether rentals or changing to LR-1/LR-2 to bring in more units.

## Tim Blakely

11/1/2017 14:08

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

My wife and I have been planning on expanding our tiny 2br1bath house by transforming our bunker garage into another bedroom and small bath. That leaves us without a garage, so we decided to build a 2 car detached garage in the backyard. Since we're thinking about starting our family in the coming years, we thought it might be nice to extend the garage and build a small mother-in-law unit for our respective parents to stay in and help us with our newborns. Unfortunately the current DADU rules include the garage in the maximum square footage. If we were to build the mother-in-law unit on top of the small 2-car garage, that would limit the size of the unit to ~360sq ft in total; impractical if not impossible for our parents to reasonably live in. We were quite excited about the proposal to remove the garage from the square footage calculation, and are looking forward to that single change being implemented since designing a 600 sq ft apartment is much different than being constrained to a 360 sq ft one.

## Nick Kiest

11/1/2017 14:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impact on loans and sales by ownership covenant

**Do you have other comments or suggestions related to the scope of the EIS?**

My newly constructed house's original plans had a full ADU on the ground floor, but the builder removed it, as they had concerns that it would decrease the addressable market with required covenants. Similarly, the new construction next door has 90% of an ADU, but they made sure it did not count, so that they would not have to sell it with the owner occupancy requirement. So, one affordable house is being demolished to replace it with one expensive house, and explicitly not including a second affordable unit due to concerns around owner-occupancy rules. If those rules were removed, both the new houses would have had (likely affordable) ADUs. There were also (maybe unfounded) concerns that a bank might not give a loan to a property encumbered with an occupancy requirement, because it would reduce the ability of the homeowner to sell or rent to uphold the mortgage.

**Gretchen Bruce**

11/1/2017 15:13

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Approve Alternative 2 and speed up the permitting process. Liveability demands it - simply not desiring density doesn't stop people moving to Seattle and the need for housing. My neighbors who are building a DADU submitted paperwork in February, and didn't get permit until August! this is way too long.

Allow tiny homes/park model homes on wheels. These are affordable options, can be quite attractive, have a small footprint, and can be sited very quickly.

**Do you have other comments or suggestions related to the scope of the EIS?**

A TWIST ON OWNER OCCUPANCY: Require three to five years of owner occupancy when any of the units are created within two years of each other. This would preclude developers coming in, tearing down a small home and creating three new units that they rent out as absentee landlords. It would still allow a new homebuyer to benefit from the rental income from the AADU/DADU that makes homeownership possible. It would also allow an established homeowner to retain ownership when life situations change (a.k.a. jobs, aging)

Enthusiastic support for the brilliant comment by JC, submitted 10/20/2017 @ 1:37:20. She rightly noted the need to ensure units are rented 9+ months/year (a.k.a. to Seattle residents), not used as a vacation rentals thru airbnb.

Enthusiastic support for comment by SS from 10/10/2017 16:53:11 to waive/reduce permitting fees

Enthusiastic support for comments by EJ, 10/20/2017 17:04:25 re: ring of walkability, lot coverage details, small loans from OH

**Karen B**

11/1/2017 15:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impact on neighboring solar utilities; Impact on local noise, privacy, blocked views; Impact of increase impervious surfaces on drainage & sewer capacity; Impact of lost tree canopy on pollution & well-being, and bush habitat on wildlife and surface temperatures. Impact on property values when non-owner occupied properties suffer from lack of attention.

### **Do you have other comments or suggestions related to the scope of the EIS?**

While I embrace the use of ADU's and DADU's to provide affordable housing to both the property owner & the renter, the exclusion of owner occupancy serves only to line the pockets of developers and investors. Too much already!!! KEEP the occupancy requirement. Unattended rental units are notorious for slipping into disrepair and renters are less inclined to participate in the neighborhood well-being. KEEP the feeling of our neighborhoods intact. Let the neighborhoods decide!

Too much development without consideration to infrastructure. Strong need to look at how traffic is going to be handled - because people DO come with cars and will continue to for years to come; Our roads are overwhelmed. Additional burden on our utility system and sewer treatment plants should be addressed in advance, not in hindsight. Seattle should look at adopting Bellevue/Kirkland impervious surface requirements!

SMALL footprint is good for the planet and starts at home. 1000sf is overkill and is larger than our entire house. The builder is the only one to benefit because it is "easier" and "more cost effective", both very short term, self serving goals. A good designer can make small even better. KEEP 800sf.

## **Chris Mitchell**

11/1/2017 15:49

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Special provisions and lower barriers to entry (i.e., smaller lot size provision) for ADUs in Urban Villages. Also, explore the potential for combining a structure across two lots (i.e., one structure that houses two ADUs in adjoining lots across a property line). I would also like to see more information about the impact on increasing affordable housing stock that additional ADUs could create.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I think that smaller lot size provisions should be made for ADUs in Urban Villages to continue to encourage denser housing stock while preserving existing neighborhood assets and existing homes. I think this could be a valuable way to create more affordable housing in the city. I think that parking requirements should be removed and on-street parking should be given significant weight in determining the need for off-street parking so that garages (which are often unused) could be converted to housing stock.

## **Eddie Griffiths**

11/1/2017 15:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My wife & I are retired seniors living in a SF home in Wallingford which we purchased in 1978. I have several concerns about the proposed ADU's which directly impact our quality of life: 1] We are shocked that in the last 5 years SF homes in our immediate neighborhood have vanished. As we speak we are ALREADY AT MAXIMUM DENSITY. Because Seattle has the hottest real estate market in the country property taxes for seniors are intolerable--even without a mortgage. Where is relief for these imposed changes??? 2] Both road and home construction + overflow parking from nearby condos renders our 2 way streets either one way or impossible for trucks. Permits for new construction for either condos or ADU's must be DENIED absent mandatory off-street parking accommodations in design. 3] Large trees are human's best hope for remediating climate collapse and must be retained. 4] Current setbacks for lot coverage are insufficient now and can't be downgraded without substantial loss of privacy, views & quiet. 5] Existing school budgets are vastly overextended. Are developers going to fund new schools? 6] Existing sewer overflows are flowing into Lake Union. That's intolerable.

**Do you have other comments or suggestions related to the scope of the EIS?**

1] It is IMPERATIVE that proposed new condos, town houses and tiny homes be located ONLY ON ARTERIALS or commercial areas where there is adequate public transport. Again, off-street parking is MANDATED for all sites being considered.

2] Is there consideration of property tax incentives for S/F units considering ADU's?

3] My strong advise is to actively discourage the corporate ruination of Seattle by precluding tax incentives for mega corporations (like Amazon) to locate here.

4] In closing, I must comment with dismay that it really feels as though this process for me has been imposed top down. I felt neither appraised nor consulted and only made it to the public hearing by my astute wife's warning day of the event. We both are compassionate about intolerable suffering of homelessness and are eager to do our part. We'd rather it felt like an informed collaborative solution from our neighbors to the City Council.

We'll be attentive...because we love our city.

**Liselotte Kragh**

11/1/2017 16:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

no

**Barbara Bengtsson**

11/1/2017 16:44

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

In my view removing the off-street parking requirement plays an important role in reducing the harm caused by too many cars in the city such as congestion, and CO2 emissions as well as improving air quality in the city. I would like to see the EIS address the impact of not removing the off-street parking requirement with respect to climate change and traffic.

**Do you have other comments or suggestions related to the scope of the EIS?**

I believe Alternative 2 would contribute significantly to improving Seattle's housing situation and make the Seattle are more sustainable.

**Tonya Hamman**

11/1/2017 17:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Keep high density in multi level condos and apartments, give the folks in houses room to breath some sort of privacy and room for vegetation,parking and not make Seattle home owners like rats in a cage!

**Do you have other comments or suggestions related to the scope of the EIS?**

**Max Baker**

11/1/2017 17:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

Wouldn't it be grand to again create housing units in neighborhoods that were legal 50 years ago but have become nonconforming through rezone after rezone? We need affordable housing, be it ADUs or apartment buildings on every block.

**James Madden**

11/1/2017 17:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

At a minimum, the EIS should examine the ongoing loss of affordability that a no-build alternative would create. The proposal could be even more robust by looking at an alternative that goes beyond the allowed form of ADU's to other methods of adding units to large lot homes.

**Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Anca Scaesteanu

11/1/2017 18:33

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

#NAME?

## Roger Scholten

11/1/2017 19:14

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

You are effectively increasing the number of people living in single family zones by triple at minimum with potentially only 1 offstreet parking space. 8 unrelated adults living in a DADU or ADU will potentially mean 8 additional cars on our streets, and don't begin to think for a minute it will not.

We do not have any ADU or DADU units currently in our block, but already cars have filled up the few remaining spaces that do exist anymore over the past 5 years. Many of the roads servicing these smaller single family zones are already narrow, plugging them all with vehicles will not only greatly endanger safe driving through these neighborhoods, it will also inevitably lead to more children being struck because of the poor visibility caused by these congested streets.

Be realistic here, not how you wish things were, but how they really are and likely will remain.

**Do you have other comments or suggestions related to the scope of the EIS?**

Anyone renting out space on their property NEEDS to be owner occupancy, i.e. proof of living in the dwelling the majority of the year!

They need off street parking.

We need say in how our neighborhoods will remain single family zoned. Let's not destroy the very reason why people live in Seattle. It's families that make the backbone and stability in our community. It is the families that put in all the extra time into PTA and school volunteering to drive excellence in our Public Education system. It is the families that vote!

**Dale Bauer**

11/1/2017 20:38

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Packing too many people to close together - as has happened in Ballard - is ruining the feel of the city. Please preserve single family neighborhoods, they are what made Seattle appealing to me when I moved here in 1963. Their absence would make this a family where families might not want to settle.

**Ovidiu Todoran**

11/1/2017 21:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

No

**Todd Reidy**

11/1/2017 22:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

removing current owner-occupancy requirements is simply opening a loophole for developers to exploit. Also, existing neighborhood infrastructures need to be considered before lowering density barriers, i.e. can the local sewer and drainage systems in a given neighborhood handle 2x-3x the density?

**Do you have other comments or suggestions related to the scope of the EIS?**

The current requirements for ADU's are not restrictive. There is no need to further erode these barriers.

**Mike La Fon**

11/2/2017 10:08

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

A contentious building type from 10-15 years ago was the "4-pack" townhouse with "auto court". These have no design review, and didn't require design professionals. Perhaps DADUs, or projects where three dwelling units are being proposed (either 3 new construction, 2 new+1 exist, or 2 exist+1 new), should require an architectural stamp?

**Do you have other comments or suggestions related to the scope of the EIS?**

I would encourage detailed study of items 3 & 6+10. I would like to know the current number of single family properties in the city, and the ratio of property owners to number of SFR properties. Also, historically how has that ratio changed pre-2008 to today? Has the ratio risen (has the number of SFR properties been consolidated into a fewer number of owners since the 2008 recession)? What is the "turnover" rate among SFR properties (how many houses change hands) each year? This is a real concern for other municipalities around the nation, and it would be informative to know the extent to which it exists here, prior to eliminating the owner-occupancy requirement. The elimination of this requirement would effectively transform all SF zones into potential MF triplex properties. My suspicion is that the "churn" in the SFR housing market is not significant enough to transform SF neighborhoods as dramatically as that sounds, but that short-term effects would be to increase prices for SFR housing beyond the reach of most citizens, as the properties become more valuable as 3-unit development properties, without realizing the immediate benefits of increased housing availability. DADU and ADU development is clearly more effective at helping current homeowners stay in their houses while dealing with rising costs of living, so maintaining the owner-occupancy requirement makes sense. That's my anecdotal perception, but it's difficult to make an objective decision without the aforementioned data. Items 6 & 10 relate to roof form: Currently, the code seems preferential to gable and hip roof types. I assume that butterfly and shed roofs are held lower to avoid tall facades facing neighbors or streets, but I think those situations could be controlled through required setbacks and orientations, rather than a blanket limit on heights. Perhaps an exception could be allowed through a sun/shadow study that demonstrates certain requirements related to neighbors?

**Steven Stroiney**

11/2/2017 10:16

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please include the environmental benefit of more people living in the city (in the new ADUs, for example) rather than in far-flung suburbs.

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like the EIS to analyze alternatives that go beyond ADUs to allow more housing in current single-family zones, upzoning to RSL, RS1, & RS2. As discussed here: <https://www.theurbanist.org/2017/11/01/submit-adu-comment-new-november-16-deadline/>

**Carole Horwitz**

11/2/2017 10:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Owner occupancy should be addressed in the EIS. ADUs introduce more complexity to potential issues of noise and yard and home maintenance that come with rental properties on single family streets.

**Do you have other comments or suggestions related to the scope of the EIS?**

I have serious concerns regarding parking, tree canopy and soil permeability as well as height limits that impact

noise, shadowing and privacy. While those are listed as within scope, they must be dealt with thoroughly and honestly as they seriously impact health, safety, and livability. It is worse than naive to expect people not to have cars, and many neighborhoods are already not safe to drive through as cars line both sides of narrow streets. Seattle has a history of changing policies without providing the infrastructure to support them. This proposal appears to be another such instance in these areas of high environmental impact.

## Carole

11/2/2017 10:45

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Looks thorough as is.

### **Do you have other comments or suggestions related to the scope of the EIS?**

#3-retain owner-occupancy rule, otherwise these become boarding houses and/or investment properties, neither of which is good for a livable city. #5-max square footage of 1000SF seems too small and prohibitive for homes >2,000SF; suggest increasing to 1200 or 1400.

## Andre Vrignaud

11/2/2017 14:11

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

No comments, other than to strongly support Alternative 2 (which appears to make it much easier to build ADUs on smaller lots).

## George W Fisher

11/2/2017 15:11

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I know a couple of families who are going to have to leave Seattle to buy property. One family lives in a DADU. The problem with the DADU concept is that it requires a shared yard and is typically a rental. Something that should be in scope is a rowhouse. With your own small front and back yards, a rowhouse gives a sense of ownership on considerably less land than a single family home. As a home owner, I'd much rather have rowhouses with character popping up, than DADUs or ADUs, or stacked townhouses with no street frontage. I know my friends with young kids would rather have a rowhouse over being a tenant in someone else's yard.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Mike Williamson

11/2/2017 17:15

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Shoreline, Kirkland, Langley & others permit cottage communities in single family zoned areas as a compatible means to provide increased population density without tree removal, high rise construction and significantly high-

er cost per square foot. When properly planned and constructed, cottages can provide amenities of single family neighborhoods while increasing density to townhouse levels.

**Do you have other comments or suggestions related to the scope of the EIS?**

Maintaining green space and trees should be heavily weighted in the EIS process. The current preference for townhouses with no or very minimal setbacks ruin the green canopy that has been characteristic of older Seattle neighborhoods.

**Anna**

11/2/2017 20:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please consider the many long term benefits of density for people and the environment. Commuting from the exurbs to Seattle is expensive and environmentally destructive, and it is just plain stressful. Please reduce barriers to missing middle housing to improve equity and human well-being.

**Do you have other comments or suggestions related to the scope of the EIS?**

Please hurry. Growing families like mine can't wait. People on fixed incomes can't wait. Renters can't wait. We need missing middle housing ASAP.

**Bob D**

11/3/2017 8:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Why is the maximum square footage limited to 1000? Is this just a nice round number or is there any data or analysis behind selecting this number. Some buildings lend themselves to larger ADUs which would be more suitable for families. Recommend increasing the maximum square footage to 1500. To ensure that ADU square footage does not overwhelm the lot size, apply restrictions similarly to lot sizes in general.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Iskra Johnson**

11/3/2017 14:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am concerned about how a neighborhood's character and affordability will change if non-owners ie. speculators are allowed to purchase a property and make it into multiple rentals. So far new and remodeled construction within the city is uniformly MORE expensive than previous unremodeled or older construction. Simply increasing density within the city has not led to any decrease in rents or housing costs. I think if affordability is the goal then there should be relaxed requirements for ADU's so they can be tiny shed construction or other alternative styles of housing rather than having to pass the extensive permitting and specs now required. I DO think height and setback regulations should be conservative and spare neighboring properties and yards from intrusive heights, loss of privacy, overlooks and the blocking of light from out of scale structures.

Parking requirements should be closely tailored to neighborhoods block by block and where there is congestion and very little street parking already (or where new development is about to put pressure on parking) off-street

parking should be required. In neighborhoods like North Beach, Broadview, Lake City, where there is ample on-street parking there should be no requirement for off street parking for an ADU. I added a permitted ADU to my north Seattle property where not one person on my block uses their garage for their car, everyone parks in their driveway, and on each block there are dozens of spaces left on the streets for visitors. Over the months of permitting and building I got conflicting information from the city and had to redesign my remodel twice to allow for off-street parking of two cars with both driver and passenger side car doors open. This was excessive micro-management with no attention to the reality of the neighborhood that added thousands of dollars to the costs of my project. Meanwhile in high density south Capitol Hill monster apodments and other structures are allowed with no parking at all, forcing long time residents and their visitors to park many blocks from their homes. This makes no sense, particularly in light of the statistics on car ownership in Seattle (<https://www.seattletimes.com/seattle-news/data/booming-seattle-is-adding-cars-just-as-fast-as-people/>) which is on track to stay neck and neck with population growth. We can't ignore that people will have cars and want/need to park them in many neighborhoods, but the zoning and permitting needs to be fine-tuned to fit the needs of different parts of the city. In high density inner city areas it can't be assumed that "everyone will take the bus" and not need a car, because that does not allow a) for visitors or b) for people going to jobs that are not served by transit or c) entrepreneurs and small businesses which need to travel around the city in the course of the day by car.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Kathy Zeim**

11/3/2017 18:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

**C.Y. Lee**

11/3/2017 20:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I love this proposal

**Joe Whittinghill**

11/4/2017 7:39

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I believe the City should consider at least three alternatives in the EIS to ensure the issue is properly studied.

**Do you have other comments or suggestions related to the scope of the EIS?**

The City seems to be taking short cuts on what is a multi-decade if not permanent set of decisions. Frankly, I feel the same way about the Key Arena process. While it has been more transparent, it has been seemingly focused on finding ways to confirm the city's desire to renovate Key Arena at any cost to neighborhoods, and especially traffic which will affect all neighborhoods west of I-5, including Ballard, etc.

## Carol Levin

11/4/2017 9:38

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My concern is that adopting O'Brien's Proposal will negatively impact our neighborhoods without increasing the affordability of Seattle's housing. We have had tremendous growth in areas where single family zoning has been relaxed (i.e. Ballard south of 65th St NW) and this has increased the number of units per lot, increased traffic, but not necessarily increased availability of affordable housing for middle income and low income individuals or households. We have had a significant loss in tree canopy, destruction of existing solidly built homes, loss of views and light blocked, neighbors stopping speaking to one another, people moving out because they find their home next to a wall of condos, overcrowded buses, potholed streets from wear and tear of increased traffic, unequal access to internet services, and utilities that have not been updated in decades.

I'm concerned that while these proposed changes may be intended to benefit every day Seattle residents, both current and future homeowners, O'Brien's proposal is just another carte blanche for developers that will increase the profits of a few, while destroying the livability of this city.

I suggest that we consider alternatives that allow one single family home and one AADU or one DADU, but not both. They must require owner occupancy for at least 6 months. The AADU or DADU could be 1,000 square feet. Height limits and lot coverage limits should directly relate to the impacts on the neighborhood. There should be a design review process/commentary period. Find solutions that benefit current home owners, but that don't impact the neighborhood and neighbors.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I'd like the EIS to analyze the impact of these proposed changes to increase 3 residencies per single family lot on the social and economic impacts for our city's current residents. This could include an analysis of existing multi-housing zone areas and impact on housing affordability by looking at association of multi-housing zone and impact on average mortgage by home owners, or average rents being paid. I'd like the EIS to show evidence that City of Seattle multi-zoning policies to date have resulted in more affordable housing. To do this, I'd like an objective definition of affordability (by income level). I'd like the EIS to provide an analysis that estimates what the proposed change will result in to meet city of Seattle targets of affordability, based on what we have seen to date. I'd like an analysis of impact to date that provides information on the explicit numbers on single housing sales in areas where multi-zoning is permitted (Ballard, West Seattle, Central District) and an analysis of the residents that are moving out of Seattle. I'd like an equity analysis done, and that would include who benefits and who loses from these changes. For instance, please analyze the trends in housing developer's profits by major developers. What percent of new construction is individual owners, and what percent are by developers? Building permit data could be used for this.

## jay wescott

11/4/2017 13:47

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

Alternative two is a more than acceptable solution for a potential density "problem" as well as accommodates the feel of a neighborhood without becoming destructive. Overloading any given neighborhood by moving forward with a seven story mega-plex (or something of that sort) not only encroaches but completely crosses the line into destructive for many of our Seattle boroughs.

## Michael Crutcher

11/4/2017 13:47

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Does city government recognize that it's push for greater density threatens single-family neighborhoods and if not curbed can destroy the elements that make these neighborhoods great? Expanded accessory dwelling as proposed can ruin the light, air, view, vegetation, play space and parking availability protected by current single family zoning. These environmental elements make Seattle neighborhoods good places to live and raise families. They are not simply unnecessary adornments to be sacrificed by planners bent on adding population density.

I fear that city government sees an imaginary Seattle, one where every commuter rides a bicycle, no one has children who want a safe place to play and there is plenty of street parking available for the occasional Amazon delivery. In this imaginary Seattle, no one needs a car to go grocery shopping, or to Home Depot for tools and lighting fixtures -- these will magically arrive at one's doorstep. Elderly people gladly walk uphill six blocks in the rain to take a bus to get to their doctor.

This imaginary Seattle is just that -- a dream. Seattle is a city of steep hills, rainy weather and narrow (and pot-holed) roads. Bicycles are ridden by a hardy bunch of young, fit thirty-year olds. Rental bicycles are ridden one-way down hill, where they congregate in masses until picked up by the rental company trucks. In the current cold weather, auto traffic is jammed on streets forced to go on a "diet" while bike lanes carry one or two brave souls.

In residential areas where greater density is being achieved (Ballard, western Capitol Hill, etc.) Seattle's already narrow streets have been squeezed by cars parked on both sides of the street. One enters cautiously, with only for one car, and if someone is coming the other way, you must back out. This is what happens when builders have no requirement to provide parking, as is proposed for accessory units.

Where accessory units are built, neighborhoods are in an uproar. Tall, skinny buildings arise like foreign intruders. In their modern space efficient design, they defy the neighborhood character. Views are impaired. Trees are removed. The place is ruined. The neighbors complain and there is a TV story. Do the council members and planners not watch TV? Do they not have an example of this accessory dwelling wound in their own neighborhood? How can they possibly believe neighbors want this accessory dwelling proposal? Or are they so caught up in their urbanist dream that they can't see reality?

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. How the accessory dwelling unit proposal affects the qualitative neighborhood experience.
2. A realistic look at available on-street parking.
3. The impact of accessory dwellings on views and hence property values of adjoining properties.
4. The impact of increased lot-coverage on play space for children.
5. A thorough look at "light and air" and how these elements are affected by the proposal, a comparison with light and air requirements in other localities.
6. An economic forecast of who actually benefits from adding accessory dwelling units -- the current residents or developers who see a fast buck.

## Kari Koszdin

11/4/2017 17:40

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The narrowness of streets in some of these areas will be a major problem if you allow more units on the same lot. Right now, parking is allowed on both sides of the streets in many neighborhoods, so the streets are effectively one-way two way streets. If you are going south and another car approaches going north, for example, one car has to pull over to the side to allow the other car to pass. On some streets that is already a challenge. If even more cars are parked on the street, there may not be any place to pull over, forcing one car to back up down the street. This already happens occasionally but would be much worse if this proposal is enacted with no consideration to this problem. The problem is already particularly acute on streets with alley parking since those people tend to park on the street. Public transportation in Seattle is just not good enough for it to be realistic to have people live in these single family zones without cars. I am not sure what the solution would be- allow street parking on one side only? Have people pay for permits to be able to park in the neighborhoods that allow these additional units? Allow more flexibility on where cars can be parked on a property?

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am all for increasing density in the city as long as it doesn't just allow developers to build more expensive housing, and does give a break to people trying to rent affordable housing. This proposal could also be good for homeowners who want to add rental units to their property but cannot right now due to the parking requirement.

## Jennifer Goldman

11/5/2017 8:05

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No. I am writing in support. I want my single family zoned neighborhood (Bryant) and similar neighborhoods across the city to have more room for housing of all shapes and sizes. I am happy to see rules allowing ADUs and the removal of the unnecessary and detrimental parking requirement.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I hope to see zoning changes allowing the numerous teardown/rebuilds in my neighborhood to be duplexes, quads, etc., providing more room for families instead of just bigger and bigger houses that still are only for a single family. As a teacher, it's also really important to me to provide as much family housing as possible in all neighborhoods, to begin addressing the extreme housing segregation and associated school achievement gaps in our city.

## Don wells

11/5/2017 9:07

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. Permitting and process fees should be no charge to homeowners that are willing to rent a new DADU or ADU for two years at below market rate.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Eliminating the necessity of one off street parking space is a huge mistake and will further clog neighborhood streets.

## Juli Cummings

11/5/2017 9:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Some properties do not have back yards or side yards suitable for ADU's but do have front yards that would be appropriate.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I disagree with dropping the owner occupancy requirement. This goes from helping preserve existing housing and expanding the ability of property owners to keep their land to giving developers free reign. What would stop a developer from razing a home and building the maximum allowed in a single family area then selling it off? Not vested in the neighborhood, not concerned about the structures fitting in with the neighborhood. But then we already have that.

## Joe Mayo

11/5/2017 10:09

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

No

## Pesha Klein

11/5/2017 21:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I totally support this. This is so needed. These structures could be done thoughtfully and not change the feel of the neighborhood. My neighborhood has large lots with small homes and could support this type of in-fill while providing on-site parking and a yard. It will be the answer to staying in my home as I age and also provide affordable rents for younger people. Many neighborhoods age out together, it would be nice to have mixed ages living together and helping each other out.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see the City promote this to existing homeowners who wish to keep their home and add the units to it, rather than big developers that are looking to tear down existing small homes and maximizing the lot for three dwelling units. These very large boxes do not fit into the neighborhoods. I also support allowing homeowners to rent out the entire house after living there for a period of time rather than having the house be owner occupied for 6 months. Peoples lives change and they should be free to come and go while providing affordable housing.

## Doug Fowler

11/6/2017 9:04

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the removal of barriers to the creation of ADUs, including eliminating the requirements for parking and owner occupation. We need more housing in Seattle!

**Denise Derr**

11/6/2017 10:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

How many non-wage earners currently living in SF zones will be replaced by wage earners under the proposed zoning? (Non-wage earners include: children, full time students, recent graduates, full time home-makers, disabled citizens, the elderly and under-employed individuals.)

How many people living in SF zones currently receive unpaid care and how will the proposed zoning impact their services?

**Keith Howell**

11/6/2017 10:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

None at this time. I highly recommend adoption of all 13 items in Alternative 2.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am in total agreement with implementing all suggested changes in Alternative 2 of the Comparison of Alternatives as noted on the Accessory Dwelling Units EIS page. While the existing code rules were intended to promote accessory family housing, the way it is coded tends to prohibit ADU's and DADU's for the vast majority of single family residences in the city of Seattle. I believe the proposed changes would allow those who cannot build under the current code to do so. As anyone who lives here knows we have a housing crisis. I believe these code changes are necessary to help address this crisis.

**Daniel Mitchell**

11/6/2017 11:25

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see tiny homes on wheels included within the definition of a DADU. Also, I think that SDCI should offer free consultations with homeowners interested in an AADU or DADU, or both, to help determine whether and how the property would meet the eventual code requirements.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am very much in favor of Alternative 2. I think the City policies on backyard cottages and AADUs should be more allowing and flexible as a creative way to achieve more affordable housing stock in Seattle.

## Stephen Savage

11/6/2017 12:20

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

2. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

3. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

4. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

5. Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

6. Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

7. Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

8. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

9. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

10. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Brian Rulifson

11/6/2017 14:32

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

How does the DADU/ADU proposal affect the 2016 "Final Environmental Impact Statement for the Seattle Comprehensive Plan Update", "Alternative 5, Preferred Alternative: Guide Growth to Urban Villages near Transit"? The proposal appears to run counter to the "Preferred Alternative".

In DADU/ADU Alternatives which include reduction of vehicular storage (parking) how do these affect bicycle and other non-automobile ownership and ridership?

How is "equity" defined in this EIS? There is a lot of talk about "equity", and assessments based on "equity" but "equity" is not well defined and makes the subsequent arguments ambiguous.

How do the alternatives drive demand for park and recreation space? Unlike high-density zoned areas where each new resident creates a single new demand for open/greenspace, each ADU/DADU creates TWO residents demanding open space: 1 for the new resident and 1 for the existing resident who has turned greenspace into dwelling space.

How do the alternatives evaluated with respect to 10 minute walksheds in accessing Park and recreation space? Do the alternatives increase or decrease the relative population in close proximity to park space?

How are noise levels to be mitigated between the ADU/DADU and the Dwelling Unit? Current Noise codes using the dB(A) weighting are particularly inappropriate for close-proximity inter-structure noise. The dB(A) weighting (scale) is designed to artificially reduce the low frequencies which are most readily transmitted through structures and therefore does not provide good measure of inter-structure noise transmission. Because ADU/DADUs are by design in close proximity to the Dwelling Unit, consideration must be made. This is particularly important for alternatives where the owner does not occupy at least one of the units.

How would low-to-moderate income families be economically affected by living in a DADU/ADU further away from transit than in an Urban Village with close transit proximity? Would motor vehicle ownership increase or decrease? Would the additional commuting time/distance of living in a Non-Urban-Village Single Family neighborhood reduce the affordability of DADU/ADU rental units?

Assuming current rate-of-growth of DADU/ADU use as "AirBNB"-type nightly housing, what are the Greenhouse Gas, sewer, and solid waste impacts vs. traditional hotel accommodations in the urban core and urban villages?

What service life is a DADU/ADU construction project expected to have?

What impact does DADU/ADU construction have on future Urban Village areas' boundary growth?

Does DADU/ADU construction inhibit, slow, or reduce the effectiveness in the future of newly-created Urban Village areas' subsequent higher-density redevelopment?

**Do you have other comments or suggestions related to the scope of the EIS?**

**Liam Tevlin**

11/6/2017 14:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Change the name of Single-Family Zoning to Residential Zoning to address the equity and design challenges associated with the antiquated term

**Do you have other comments or suggestions related to the scope of the EIS?**

I urge you to allow for ADUs to be built and to provide the necessary information on their benefits to Seattle residents in these affected areas

**Leslie Nicholas**

11/6/2017 16:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I have a strong concern about rain water runoff. It's my personal opinion that our sewage overflow that enters into Puget Sound has increased due to the rapid development of impervious surfaces in our city. Increasing the percentage of square footage of dwellings on existing city lots, will likely have serious consequences for the water quality in Puget Sound, particularly if there are 2 additional dwellings allowed on each lot. One unit seems more reasonable.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm also concerned that developers will buy houses and knock them down in order to build the maximum amount of dwellings with the maximum amount of square footage permitted on each lot. Many historic and older homes could be devalued and demolished. I strongly believe lifting the owner occupancy requirement is a bad idea. I'm also concerned that increased back yard cottages will yield more vacation rental units rather than long term rentals, which could contribute further to the housing crisis. Some sort of financial incentive should be offered to home owners who rent backyard cottages to long term tenants instead of vacation rentals.

**Maureen**

11/6/2017 17:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

If this is to address the "affordable" housing problem, what guarantees are there that these will not be turned into Airbnbs or that they will be "affordable"? Is it intended that families with 2.1 children will live in them, or are they "mother-in-law" units for single people? Homes in SF neighborhoods are generally not within walking distance of grocery stores, hardware stores, restaurants, pharmacies etc. People WILL still want to use their cars for these errands, or to visit their friends across town, or to get to our great outdoors Northwest. Parking MUST be considered, because like it or not, the cars will be there and these old neighborhoods are already inadequate for parking. Infrastructure must be considered (sewer, water etc). Your new structure should not be allowed to block the sun of your neighbor, just because you want the investment. There is quantity and quality. Must be owner occupied... otherwise this will just be a developer free-for-all.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Ben**

11/6/2017 21:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I favour Alternative 2, and recommend waiving permit and service connection fees to encourage homeowner participation.

**Ned Abenroth**

11/7/2017 4:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

Let's get the new rules approved ASAP! Increase rental supply and take pressure off increasing rents.

**Rob**

11/7/2017 11:00

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. I would encourage the review of the current height limitations on lots less than 30 feet wide for permitting/encouraging building of an AADU. The city recently (2013 as i recall) implemented a height restriction to 25' on lots less than 30' wide. With roof limitations this effectively limits a dwelling on a lot less than 30' wide to a maximum of 2 stories. This discourages the building of AADUs in such structures and essentially eliminates the possibility of AADUs on narrow lots. If the city wishes to encourage the availability and density of housing within the city then the City should consider removing this recently implemented height limitation so as to encourage owners/builders to build AADUs within residential structures on narrow lots. At the very least there should be a provision for conditional permitting of structures up to 30' plus roof allowances on a case by case basis OR conditioned upon requiring the building of an AADU rather than the current outright prohibition on structures greater than 2 stories on narrow lots.

**Do you have other comments or suggestions related to the scope of the EIS?**

**rob**

11/7/2017 11:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow for 2 AADUs where appropriate. The city council's current proposal allows for 1 detached ADU (DADU) plus 1 attached ADU (AADU). Why not allow for 2 AADUs? One would think that 2 AADUs would have less impact on sight lines, lot line issues, neighbor conflicts, views, sunlight penetration, shadows, solar hot spots, tress, imper-

meable surfaces, environmental impact (building materials, etc.), etc. than 1 AADU plus 1 DADU. If the city wants to encourage ADUs and housing density and affordable housing then allowing for 2 AADUs makes more than the current proposal of 1 AADU plus 1 DADU. If a property owner can't accommodate even 1 DADU, but can accommodate 2 AADUs why not allow it? You can have up to 2 ADUs, only 1 of which can be detached.

Carrots work better than sticks in most cases and we should encourage home owners and builders to find creative, low-impact ways to accommodate additional rental living space. We have a housing affordability problem. ADUs help both sides of this issue - ADUs help property owners generate income to address ever increasing property taxes and home ownership costs and it helps those looking for an affordable place to rent. "Empty nesters" are often faced with unused/under utilized space while young people often don't need and/or can't afford space sized for families. If we want more housing, and especially more housing that does not consume more land, then we need to encourage "shared" housing space. Adopting city codes that encourage rather than prohibit or discourage shared housing is key. A friend of mine bought a small home in the city years ago when he was single. He later got married and had kids and doubled the size of the home. Now his kids are grown and he has way more space than he needs. The city should provide incentives for him (tax breaks, streamlined permitting, etc.) to share as much of this space as possible - no additional land consumed, no trees cut or building materials consumed and there will be little if any impact on utilities because the house was sized to accommodate 6+ people anyway. Why limit him to just one ADU?

**Do you have other comments or suggestions related to the scope of the EIS?**

We can't stop growth. It will happen. We can either manage it, (i believe the city is required by the state to have a growth management plan to comply with the growth management act) or just let sprawl happen. Sprawl magnifies transportation and utility problems. Density can be architecturally, visually and socially positive if we do it correctly. Yes, we have traffic problems, but those problems will only get worse if we force residents to commute from outside the city to/from work. Managing density is the key. Yes we have parking problems - address this by encouraging alternative modes of transport (car sharing, bikes, mass transit, etc.). Encouraging ADUs rather than simple "allowing" them seems like the lowest cost, most efficient way to address the problem.

**Michael Shriver**

11/7/2017 12:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

As a current resident of a backyard cottage, in a busy single family neighborhood core (Ballard), I support Alternative 2 in all cases. Having been able to find this unit was a lifesaver in an area where housing is extremely tight.

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to see some restrictions put on temporary/short-term/vacation rental usages for this type of unit (AirBNB) Additional Restrictions would help ensure that the new units that are created go towards permanent housing for Seattle residents, and not the profit of homeowners.

**Rob**

11/7/2017 12:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking is an issue for many home owners. The city should consider offering incentives for residents to not drive/own cars and for property owners to provide for off-street parking. If we can at least partially address the housing issue with ADUs then why can't we do the same for parking? The current city proposal eliminates the require-

ment for off street parking. I suspect this was a major impediment for property owners to build ADUs. Perhaps this impact can be offset by encouraging others to provide additional off street parking. Maybe i don't have room or can't afford or don't want to build a backyard cottage, but maybe i do have room for 1 or 2 more off-street parking spots. If the city offers, for example, a tax break or some other incentive i might be encouraged to make room for an off-street parking spot so that an ADU somewhere else in the neighborhood will have less parking impact. Maybe instead of a tax break i could choose to have a special parking permit that allows me to park down town for free or at a reduced rate. Maybe if i'm building an ADU and i do provide for off street parking i get my building permit fees refunded or reduced or ? A parking spot consumes much less space and costs much less to construct than a cottage/ADU.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Joe Sullivan**

11/7/2017 13:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

What is the impact of inadequate supply of housing? The social and environmental impacts of 1,000 new residents per week without increased housing supply will hurt our neighborhoods more than ADUs.

We will lose the diversity of fixed-income seniors, working people, and youth.

My father (70+ yo) can afford to stay in the city because he can rent out the cottage in his backyard. The new 20-something neighbors also give him social connection and reduce isolation. We should be looking for more opportunities to increase "middle housing" (between giant complexes and single family homes) because it strengthens the social vitality and inclusion of our neighborhoods.

Yeah, parking is rough, but those people are coming for the jobs and vitality of the city. NOT supplying affordable housing will not stop them.

**Do you have other comments or suggestions related to the scope of the EIS?**

I strongly support the cottage proposal:

1. Way more efficient to increase density in urban areas.
2. Increases affordability by subsidizing home ownership with additional rental income.
3. Most direct route to increasing supply--backfilling by existing/new homeowners.
4. Boosts neighborhood vitality and streetlife...more people on the streets means more interaction with neighbors, neighborhood businesses, etc.
5. Preserves historical neighborhood character because more rent (and value) can be extracted from a home by adding on...versus tearing it down and building to the lot line.
6. Drives transit access. This is a virtuous cycle. As neighborhoods become more dense, alternatives to the automobile (bus, bike, rideshare, etc.) become more valuable and more common. Many of the people resisting density are looking through the rear-view mirror.

I would really like my kids to be able to afford to live in Seattle. Without more supply, it looks like a long shot.

## Kyle

11/7/2017 13:40

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Impact on a property's ability to absorb rainfall, i.e. issues with runoff, flooding, water table, erosion, etc.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Thank you for pursuing changes to these regulations! As a property owner, this could allow me to use the resources I have to help provide an affordable place to live for someone. People are coming to Seattle whether we like it or not, and ADUs at least provide an alternative to even more apartment expansion. Also glad that you are proceeding with caution and proper analysis. This will have both good and bad impacts on Seattle, and we have to maximize the positive and minimize the negative as much as possible. As this will increase single-family neighborhood density, please especially take into account ADU proximity to existing single-family homes, impact to a property's ability to handle rainfall and runoff (i.e. flooding and erosion), the loss of green space and plant life, and additional mass transit expansion that will be needed. Thanks!

## Kelly Schmitt

11/7/2017 18:00

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I do not see anything in the scope that talks about the effect of having absentee owners. At least now, an owner must live in one of the units for 6 months and, by consequence, "put up with" the downsides of having multiple people living on lots in neighborhoods that were not designed for it. I do question whether this is enforced, however. Almost all the "problem" houses in my neighborhood (occupants of questionable character, junk cars parked on the streets, unkept lawns, etc.) are ones in which the owners do not occupy one of the units.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Currently, in neighborhoods zoned as single-family, such as my own, parking is already at a premium, and there is already a chronic problem of driveways being blocked. In addition, it is very difficult to navigate down streets, many of which are very narrow, when cars are parked on both sides (and some so narrow that it's cat and mouse to get by with cars on only one side). Increasing the housing density would exacerbate an already serious problem. Our public transit infrastructure is such that many people do not take buses, and insist on driving their own cars. I would argue that this is especially true of people that move further out of Seattle's core downtown/capitol hill/belltown neighborhoods. They want more peace and quiet, they want more space, they want to be able to have a car to use as they see fit. I do not live there, but people do not move to Laurelhurst, whether in an ADU or otherwise, because they want to give up their car and use public transit and become "urban." To assume that expanding ADUs in such areas will increase affordable housing options in Seattle is ridiculous. It's just something to make the current residents, who paid a premium for peace and quiet and space, which is now disappearing, more miserable.

## Chester Knapp

11/7/2017 22:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. Legal compliance - assess estimated number of illegal or unpermitted mother in law units under each alternative (assumption, no action would have a higher rate, action would have lower rate due to allowing existing MIL units to be legalized). And 'housing diversity' - would either scenario result in a more diverse housing stock.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Alex Bachleda**

11/7/2017 22:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I think it is great that you are trying to increase the creation of AADU's and DADU's. I hope this increased density brought on by AADU's and DADU's will give the residents of Seattle more affordable options when it comes to rent. And the inclusion of additions of the following items are also excellent "AADU 1,000 square feet, excluding garage and storage areas. DADU 1,000 square feet, excluding garage and storage areas". Overall this will be a boon for Seattle and make this a more livable and beautiful city!

**Adrian Down**

11/8/2017 7:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I strongly support the city's EIS in this area. We badly need more housing, and ADUs are one way to increase the stock of affordable housing in the city. I also strongly support removing the parking requirement for ADUs. We need to move away from cars and towards alternative forms of transportation for so many reasons, including environmental sustainability, cost of infrastructure, etc. Mandating parking requirements with ADUs increases housing costs, which we cannot afford to do, and locks us in to a car-dependent culture that will continue to weaken and destroy our valuable walk-able neighborhoods.

**Margaret kunz**

11/8/2017 9:13

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

What impacts will greater building bulk and lot coverage have on tree canopy and vegetation, storm water control and sunlight to neighboring homes.

What impacts will absentee ownership have on micro communities within neighborhoods, property upkeep, and local civic engagements?

If there is no owner occupancy required, how can the amount and impact of developer speculation be projected? Especially if 2 ADUs are allowed on a single property? How will speculation impact lower and middle income owners?

**Do you have other comments or suggestions related to the scope of the EIS?**

I support DADU building but only as listed under the current regulations. I think the current regulations protect land use, public service and utilities, aesthetics and socioeconomics and support home ownership while offering an affordable and attractive way for people to stay in their homes in retirement. Simultaneously increasing density and housing affordability.

MORE IS NOT BETTER -adopting the proposed changes in the DADU regulations will attract builders from outside of Seattle who see financial opportunity and not aesthetics in construction or the need to maintain property grounds ( absentee landlords). I fear a drastic impact to the fragile balance in the quality of our life in Seattle. Allow the current DADU and ADU to progress under the current guidelines/ regulations.

## Lindsay Lockhart

11/8/2017 9:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

This is a necessary change, and "neighborhood character" should not trump the need to expand affordable housing options in Seattle.

## Josh Gerak

11/8/2017 9:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Let's move this forward. No EIS is needed -- it's just a waste of money. We are not going to change people's car habits until gridlock forces them too. People will just start using cars less - bus, bike or on foot. We're already there.

**Do you have other comments or suggestions related to the scope of the EIS?**

Let's get this moving!

## Lorrie Scott

11/8/2017 12:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Here are my concerns with the proposed changes:

- removing the requirement that the property owner live on the property. I've lived in my home for 25 years and maintain it well, as do my neighbors. I do that because it maintains my property value and because I care about it. Down the street from me is a house, not owner occupied, used as Air B&B - clearly not maintained.
- I'm concerned that developers will buy up lower cost properties, easily outbidding families, in order to tear down the existing home and erect some poorly constructed big box with ADU/DADUs. Then rent it out with no concern for ongoing maintenance. Will those ADU/DADU be affordable? I'm guessing they will go for market price. And it creates a more transient population in existing single family neighborhoods. It changes the whole feel - neighbors don't know neighbors. At least having the property owner present creates a tie back to the existing neighborhood.
- parking can already be tight in neighborhoods. Removing the parking requirement just makes it that much worse.

- what about all the lovely trees in existing neighborhoods? Increasing the allowable square footage means more of the tree canopy is lost.

**Do you have other comments or suggestions related to the scope of the EIS?**

I get it that we need more housing. Some areas of the city have existing infrastructure and public transportation to manage increased numbers. And some really do not. Why not thoughtfully try out new guidelines in selected areas and SEE HOW IT WORKS OUT before opening up the entire city to this grand experiment? Or is the city saying: "here's the new Seattle. Move if you don't like it."

**Richard Lague**

11/8/2017 16:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. How many new living units would be built? How many units would we need to build to allow a person making an average wage in Seattle to pay only 50% of their income on rent?

**Do you have other comments or suggestions related to the scope of the EIS?**

What options does the city have to enact policies that would give people an incentive to forgo owning a car? (Increasing the density of our single family house neighborhoods will make parking very difficult -- unless we can get people to own fewer cars.)

**James Barger**

11/8/2017 19:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I think the scope of the EIS is exactly what seattle needs. With Our on going housing crises, Seattle needs a suite of options to combat the increasing costs of housing. Increased density, rezoning, and affordable housing are important tools and added numbers of ADU's, I believe will help drastically.

**Mahina Oshie**

11/9/2017 8:46

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am concerned about the proposed changes. More ADUs on existing property takes away from existing green space and increases congestion on streets that are already suffering from congestion. There will not be major transit improvements made to many neighborhoods effected by the proposed changes.

**Do you have other comments or suggestions related to the scope of the EIS?**

I disagree with allowing two ADUs on one lot. In addition, there should be an off-street parking requirement for any home with an ADU and if there is an ADU on a property there should be owner-occupancy for at least 6 months of the year.

## Theresa Nilsen

11/9/2017 9:03

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like you to include additional language that would prevent developers from adding additional units without off street parking to a single family lot. I do not want to see three houses go up on the lots next to us. I believe you are trying to go around the single family zoning and increasing the density without the need for the appropriate parking etc. You will be decreasing the value of my property while increasing the profit for developers who I believe do not contribute to the infrastructure of Seattle and that is why we are having the traffic problems etc. because our infrastructure has not kept up with the building boom. I do not want this to happen to the neighborhoods we live in. The city is breaking at the seams as it is. Keep the zoning as one house per lot.

## Therese Roberson

11/9/2017 9:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The permit process is too complicated for adu's given that no new structure is being built.

**Do you have other comments or suggestions related to the scope of the EIS?**

I believe the main residence needs to be owner occupied. I fear what would happen should these properties become investments rather than having an ownership tie to the neighborhood.

I fully support eliminating the parking requirements.

I believe the creation of two accessory units per lot should be

reviewed on a case by case basis.

## Andy Ball

11/9/2017 10:10

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

## George Guttman

11/9/2017 11:12

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The need for additional public transportation options in a city with ever increasing density.

**Do you have other comments or suggestions related to the scope of the EIS?**

## Mani Soma

11/9/2017 12:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Units must not be located adjacent to green belts to avoid increasing damage to the environment.

Units must not be located on land subject to frequent slide (e.g. Magnolia) and flooding.

**Do you have other comments or suggestions related to the scope of the EIS?**

1. The dwelling units must be used for housing and for increasing affordability, not for rental to short-term Net-based rental companies.

2. Parking must be addressed!!!

3. The owner must be an occupant of one of these units or the original house on the same lot. The owner must live there at least 50% time each year so this is not a vacation house and land being used to create additional dwelling units.

4. Units must be close to public transit and have access, within a short distance, to services and facilities such as markets, hardware stores, etc.

5. Mixed-use must be preserved and single-family housing cannot be displaced in the name of density. The character of the neighborhood and community is important and must be preserved.

**Graham Faassen**

11/9/2017 12:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I'd like to understand the environmental and public safety impact to increased street parking in neighborhoods such as Broadview that do not have shoulders or sidewalks on many of the streets. Increased street parking will make roads more narrow, continue to reduce safe walking spaces for pedestrians and reduce overall safety.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'd also encourage including owner occupation requirements for the main dwelling to limit the "Airbnb" use of additional dwellings.

**Ken Jensen**

11/9/2017 13:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Consider that housing in close proximity to grocery stores can reduce the resident's practical needs for costly car ownership and associated parking spaces. New multifamily developments with or near to grocery stores should be incentivized to permit higher density and lower parking requirements. More of these mixed-use developments in Multifamily, Neighborhood Commercial and Commercial Zones, especially in Urban Villages, could create more affordable housing that, in turn, could reduce the density pressure on Single Family Zones.

**Do you have other comments or suggestions related to the scope of the EIS?**

Comments per sequence of EIS issues:

1. Single Family lot size designation could contextually determine allowable quantity of ADUs.

2. Off-street parking requirements could relate to the Single Family lot size (and width) designation and existing street width.
3. Owners need not occupy any of the units, provided that RRIO issue # 13 addresses applicable concerns.
5. Larger Unit areas, without being penalized for garage and storage areas, may be more widely appealing to various owner and tenant demographics.
6. Minimal additional height allowance can add a story and consequently reduce the coverage.
8. Alternative 2 provides more design flexibility.
9. Alternative 2 provides more design flexibility.
10. Single family height limit regulations should apply to ADU's and incorporate issue #6.
11. An increase in household size to allow 12 unrelated persons per single family lot may incentivize the demolition of the existing house and construction of new structures to accommodate. Need to confirm this.

## Gordon Padelford

11/9/2017 13:59

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

- 1) In addition to ADU/DADU reforms please study a bolder rezone of SF 5000 to allow RSL, or similar zoning that keeps a similar form to current zoning, but allows for additional people to live on one lot.
- 2) Please consider creating a streamlined permitting process for pre-approved designs. These designs could reflect the culture of the pacific northwest by being required to incorporate natural materials such as wood and stone to help create an architectural sense of place.

### **Do you have other comments or suggestions related to the scope of the EIS?**

- 1) Move swiftly. The affordability crisis is now.
- 2) It's good to see parking minimums not being required. Most single family zones have a huge over abundance of parking.

## svend lee

11/9/2017 14:11

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I agree with alternative 2. However I think that if future DADU's along with existing dwellings on the same lot met added measures of preservation (energy and water/sewer), it might help to minimize or even cancel the increased load on the infrastructure.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The pressure on parking will serve as an incentive for more communal transportation solutions which in the end is beneficial to all. City wide, the space occupied by parked vehicles is ridiculous.

If financing is a challenge, why not a city fund to secure loans between lenders and borrowers. Not a subsidy but a investment.

The current state of single family zones is below the density to function efficiently and encourage healthy and vibrant neighborhoods. Looking at cities around the world makes it obvious.

## Corey Fitch

11/9/2017 14:12

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see an expedited permit process for DADU's included in the proposal

### **Do you have other comments or suggestions related to the scope of the EIS?**

I strongly support the expansion of ADU's and DADU's. The concerns about parking, traffic, etc are simply NIMBY responses of people fighting against change. Seattle is growing and that fact will not change any time soon so we must adopt public policies that support density and affordability.

## Lisa-Marie

11/9/2017 14:44

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am in support of the suggested changes: increase allowed sqft, not require parking, etc. I hope the EIS is completed quickly and new law will go into place.

## Nanette Westerman

11/9/2017 14:49

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I believe that one ADU or DADU is sufficient for any single family lot in Seattle. My current residence, in a single family zone, is about 2,400 square feet, and is quite large. DADU of 1,000 sf would be nearly half the size of my house - hardly a "small cottage," and would nearly cover the remainder of land on my lot. The 800 sf unit size is sufficient. Leave the law as it is, and concentrate on finding ways for more people to add ADA's and DADU's under the current law. I believe the current need can be met under current zoning.

## Moani Russell

11/9/2017 14:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

The primary home owner should have to live on the property at least 6 months out of the year. I see ADUs as a way for homeowners to afford to live in the city; not as a way for property owners to make money while not dealing with the consequences. ADU owners should have to deal first-hand with issues that arise from having up to 12 people living on one parcel of land. Owners should not be able to hide behind property management companies.

Seattle's tree canopy is vital to our air quality. I am concerned that trees will be razed to make room for ADUs. Also, if current yards/natural areas are turned into ADUs, then there will be more runoff going to our drain and sewer systems. Maybe ADU owners should have to mitigate this effects with green roofs, water recycling systems, and permeable surfaces. The city should also encourage homeowners to create ADUs out of existing sheds, garages and even patios.

**Nick**

11/9/2017 15:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please study the allowance of more flexible housing in all single family zones, including duplexes/triplexes, townhomes, rowhouses and perimeter block housing. Merely ADUs is not enough to address our substantial housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

Go big and bold! Study more than just ADUs - study more urban housing typologies to be allowed in all of Seattle

**Glenn Ritzma**

11/9/2017 15:56

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes.

(1) Address the massive increase in the powers of monopolized internet provide'rs lobbyist and price fixing, tying agreements, i.e. Comcast'S STRONGHOLD multiplied by 2/3 times.

(2) No lease should be consummated without certification that any/all tenants do NOT have (own, registered, rented, borrowed, etc.) a motor vehicle (verified through dept. of licensing and sworn statement subject to eviction) to be parked in the neighborhood. Otherwise, owner must provide off-street parking for each and every tenant needing it, that is aesthetically pleasing, or unobtrusive to that community.

(3) Owner occupation must be mandatory to insure no motel/AirBNB business activities are allowed under any circumstances with these zoning changes, AND, subject to penalty of enforcement as these schemas are RIPE FOR UNDERGROUND SEX TRAFFICKING [<http://knkx.org/post/seattles-underground-sex-economy-explained-five-points>]

(4) Lowering qualified lot size, while increasing number and size of units, is ludicrous and will increase further pressure on city utilities demands for greater infrastructure paid by all of us instead of landlords (profit takers) paying the entire expense.

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes, in other submittals

**kathi wheeler**

11/9/2017 16:13

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I just want to make sure we don't end up with a water run off mess on our hands with flooding and such because we don't have enough ground to soak up the rain.

**Do you have other comments or suggestions related to the scope of the EIS?**

Maybe a provision that if you are putting a DADU that is a tiny home under a certain size you could put more depending on the size of the lot? Grandfathering existing AADU & DADUs?

**John Schlosser**

11/9/2017 18:18

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

All agree that the EIS should help City decision-makers weigh the pro's and con's of changes to the ADU rules. The con's are well-discussed and understood: e.g., parking, traffic, sewer, privacy issues, etc. Please be especially careful not to over-estimate the "Pro's".

1. ADU's may not rent for less:

The EIS should clearly acknowledge that ADU changes will NOT solve housing affordability: eg., no rent limits and no City MFA \$ requirements. In our Capitol Hill neighborhood, the legalized ADU's cost owners \$150-250k to build and tenant pay "tech bro" (ie, high) rents.

>>The EIS should estimate expected units to be built AND rent levels, by neighborhood.

2. ADU's may not increase housing supply:

The EIS should also address the likelihood that ADU rule changes won't increase housing supply appreciably overall--just the \*type of housing. That is, a tenant renting an ADU is one less tenant for an apt, so increasing ADUs will reduce demand for (and developer desire to build) apartments.

3. Un-bundle the set of multiple rule changes:

Decision-makers need to know the separate impact of specific elements. Some, like allowing non-owner occupancy, are more impactful & controversial than others. You really need to find a way to separately evaluate the pro's and con's of each--not simply say "Here's the full package, take it or leave it."

>> For example, the EIS needs to analyze more than 2 Alternatives/Options.

4. Include non-zoning issues:

Issues such as minimum room sizes (building code) and SPU/King County sewer connection fees are not zoning but constrain ADU options. They need to be taken seriously by the EIS.

5. Effect of rule changes on existing non-licensed ADUs:

Seattle has many more ADU's than shown in public records because they are informally built. The EIS should carefully evaluate whether new rules for "legal" ADU's will result in higher rents once these low-cost informal ADU's are legalized.

The count of net new ADU's should carefully defend its methodology for estimating ADU's lost and well as gained/legalized.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jamice Bartanen**

11/9/2017 18:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes, please don't allow three units on one city lot! Ballard has been ruined by all the "progress", there are more apartments and transients living there than ever before. You are making Seattle unlivable for all! Single family homes encourage neighbors to get to know one another, to watch out for one another's children, to visit with each other. All the "ADU's" and large apartment complexes don't allow for communities to thrive. We don't want to be like New York, if we wanted to live like that, we would move there. Stop ruining our city!

**Jamice Bartanen**

11/9/2017 18:59

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, parking! I realize that the city leaders think everyone should take the bus... obviously with our traffic problems, that's not happening. It can't happen, not everyone works downtown and most folks don't want to take three buses to reach their destination! So, if you allow three units on one lot, there will be the added problem of parking! The streets are full of cars now, homeowners can't find a spot in front of their home and in some neighborhoods you have to pay a fee to park in front of your own home! Really, can't the leaders of this city find actual ways to fix problems without always creating many more problems with their progressive ideas??

**Do you have other comments or suggestions related to the scope of the EIS?**

Stop ruining our City! If you love New York or San Francisco so much, move there!

**Steven Herlocker**

11/9/2017 20:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I'd like to understand parking, congestion, and expected impact to theft and property crime by adjusting this zoning.

**Do you have other comments or suggestions related to the scope of the EIS?**

Single family neighborhoods are the backbone of our city. Please tread lightly wktg increased density for density

sake. Development is better served in areas on existing and future transit routes.

## Christopher Grierson

11/10/2017 9:15

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

I strongly support Alternative 2, as it creates more desperately needed housing within the city.

## Don Miles

11/10/2017 14:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I do not support the proposed changes to the ADU/DADU regulations in single family zones. I do support upzoning and the MHA program in urban centers and urban villages where new units and affordable housing will be built near existing and planned infrastructure and transit to accommodate growth.

Under current regulations ADUs and DADUs flood the AirBNB listings for short term rentals. This does not provide affordable housing and homeowners seeking investment income should buy rental homes or multi-family properties. Off site MHA funds should be made available for seismic upgrades to older brick apartment buildings if owners agree to set aside a percentage of their units for affordable housing. This preserves character buildings and affordable housing. Our single family homes and skinny (yield) streets are a valuable resource that should be preserved providing strong community ties and densities encouraging walking and alternative transportation.

**Do you have other comments or suggestions related to the scope of the EIS?**

Assess traffic, parking, pedestrian safety and school children access route impacts.

Assess heat island, impervious paving, tree canopy, storm water, sewer, water and power, noise, loss of light and shadow impacts.

Assess fire and emergency vehicle access impacts.

Assess loss of current affordable housing in existing smaller homes when an ADU and DADU development occurs.

Assess public safety and security impacts on neighborhoods with ADU and DADU development.

## Edip K Oner

11/10/2017 15:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the garage space to not count against DADU space.

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like the garage space to not count against DADU space.

## Maria Bruzas Zinkus

11/10/2017 16:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I would like to put in a vote for Alternative 2. My husband is retired and I am not far behind. We've lived in the city for nearly 30 years, raised our son here and would like to continue living in our home in our Queen Anne neighborhood. We would like to stay near family and friends in an walk-friendly neighborhood. Something we need to consider as we get older! Unfortunately it is getting close to impossible for us to live here because of rising costs! If Alternative 2 would be put in place, that would allow us to build an ADU in the back yard of a rental we own. This in turn would give us the extra income we need to stay and grow old in our home. Thank you, Maria.

## Jonathan Miner

11/10/2017 17:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No. The EIS should be minimal. It's odd that it's even needed for a zoning proposal of this sort. It should be self-evident to everyone that adding a couple hundred backyard cottages in Seattle will have far far less impact from an environmental perspective than building large apartment units that cover the entirety of a lot.

**Do you have other comments or suggestions related to the scope of the EIS?**

Let's get the DADU/ADU rules changed ASAP!

## P

11/11/2017 7:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

With the change in regulations how will we prevent investors and speculators from dominating this market?

**Do you have other comments or suggestions related to the scope of the EIS?**

I am opposed to changes to the regulations. ADUs should only be allowed where the owner lives on premises.

## Carole M Danis

11/11/2017 8:48

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am very concerned about the impact on our neighborhood of the proposed zonal changes to allow for ADUs and backyard cottages. I live on a highly congested street and area with multiple and massive rental/low-income developments. To allow ADUs and small cottages would further overwhelm the local area. I am concerned that city services would not be able to keep up with the needs of the residents, especially emergency medical care for the elderly and disabled population who live in the area. Other services which would be affected are fire department services, electrical and water capacity, impact on our streets, etc. If ADUs are to be allowed, the city services must be increased which doesn't seem likely. Thank you for consideration of my concerns.

## **Do you have other comments or suggestions related to the scope of the EIS?**

### **Dana Stahl**

11/11/2017 16:45

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. My neighborhood is in the study area. We have limited public transportation-there is one bus that runs during commute hours M-F only (much reduced from what it was 10 years ago), and the bus does not arrive reliably on time. This means that people living in this neighborhood must have cars. Potentially tripling the number of residents without requiring off street parking will be problematic.
2. (rumour has it) my neighborhood was promised sidewalks when it was annexed by the city some 50 or so years ago. With increased traffic to the area, this will impact pedestrian safety. Will sidewalks be added? Will there be additional controlled intersections and designated crosswalks?
3. I am concerned about sustainability and green spaces. There are many substantial trees in my neighborhood. Will there be prohibitions against removing trees of a certain size? I am concerned in reduction of offsets of greenhouse gasses that these trees provide.
4. Along the same lines-I would like to see a requirement for green roofs or rooftop gardens on properties in which a substantial amount of the property is taken up by buildings. For example, if buildings cover more than 60% of the property a green roof or rooftop garden should be required.
5. How will the proposal ensure that homeowners are allowed ADUs, but at the same time prevent developers from tearing down existing houses and putting in high end multiple housing units on these properties, that are out of the price range of the people that this proposal is intending to serve?

## **Do you have other comments or suggestions related to the scope of the EIS?**

### **Geralyne Rudolph**

11/11/2017 17:51

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. "Neighborhood" crime -- burglary, car prowling/theft, mail theft, home invasion, vandalism. A 50% increase in population (going from max 8 to max 12) will mean more stuff to steal, more thieves and tweakers roaming the SFR areas. This is a huge increase in risk, especially for homeowners who are not benefitting from a rental adu. Police staffing is currently inadequate, it will be nigh on useless if this is implemented, UNLESS police staff is first sufficient to address the current level of crime and then increased proportionately to the rise in population. Crime mitigation must be addressed.

## **Do you have other comments or suggestions related to the scope of the EIS?**

### **Geralyne Rudolph**

11/11/2017 18:20

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

- Enforcement of violations -- with three units on a lot, there will be some with far, far more than 12 people -- each unit at max size could easily sleep 12 (in alaska during the pipeline, a 2BR house rented out sleeping bag space at

\$10/night and had 47 tenants at once) -- a rash of flophouses for meth addicts and prostitutes could turn some alleys into drug and sex avenues, a far cry from a quiet lane of she-sheds, man caves, and guesthouses. and a distant owner who is not a tenant may not care that the rent money is being paid by the hour. Or maybe the owner is the crime boss. This proposed action is a dream come true for pimps and dealers, i can see their profits doubling at least and every child in the neighborhood at risk. It's just asking for trouble to not have some sort of well-funded enforcement program to make sure abuse of the code can be addressed, because it will absolutely guaranteed be abused beyond your wildest expectations. i like the idea of backyard cottages, but i can think of several ways it could endanger the community if left unregulated and unmonitored.

**Do you have other comments or suggestions related to the scope of the EIS?**

have several planned reviews (1 yr, 2 yr, 5 yr) to monitor the results of the change in code, and modify the code as needed based on the monitoring results.

**Camille Callner**

11/11/2017 20:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm very uncomfortable with owners of DADU's or mother-in-law units not having to be full-time occupants of the property. Consider the negligent landlord in the Roosevelt district who had various ramshackle properties, was a neglectful, disrespectful owner for decades. Those properties were ugly, and a health hazard and there seemed to be nothing the City could do about the situation. Also, the number of occupants on a property should be limited to no more than 6. I'm very concerned Chinese nationals will buy up properties, build extra buildings in the back and it will turn into a nightmare for Seattle neighborhoods.

**karina williams**

11/12/2017 2:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

not enough parking in area shortening lots is not a good idea. neighborhood is already suffering from congestion, not enough lanes for cars.

**Do you have other comments or suggestions related to the scope of the EIS?**

this should not be allowed without much more investigating on impact to neighborhoods. Cars are running our area over, but we do need to be able to drive around the city.

**Tom Allen**

11/12/2017 10:32

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

This is a needed change. Vancouver, BC has a wide array of ADU rentals and it helps local owners provide affordable housing.

## Jill Malone

11/12/2017 14:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

I think alternative 2 is a great choice. Seattle cannot currently keep up with the growth and not everyone wants to live in a condo or appt, This option will allow more people to live in a house without current lots being covered in townhouses or multifamily units that change the character and aesthetics of a neighborhood.

Density does need to be bearable and this seems like a great option.

I live and own my home in N Seattle [Wedgewood area] and this seems like a very reasonable solution to me.

Thank you for this opportunity to share my opinion . I just hope this effort isn't sidetracked by a lot of Seattleites who don't want any change to take place .

Jill Malone

Mark Malone

## Jeff Boyer

11/12/2017 15:50

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the city to clarify why the existing rules regarding DADUs should be changed. Is it because existing homeowner's are not able to build these due to cost, or regulatory or other factors? Or is it because the city wants/needs more affordable housing? If the goal is to aid homeowner's, then lifting the owner-occupancy requirement seems inconsistent. If the goal is to build more affordable housing, why is this being pursued via changing the DADU regulations as opposed to building more affordable units along primary and secondary arterials, where the growth is less likely to adversely affect the livability of the neighborhood? It would seem that two sides have developed, with one demanding more affordable housing, using DADUs, and the other scared that the livability of neighborhoods zoned single-family will be destroyed. The goal of aiding homeowners seems to have been forgotten. If, indeed, the goal really is to build more affordable housing, will these units be rented affordably? What will prevent homeowners from renting them at market rates? On Airbnb? From developing the property, having a relative live there from one year and then selling? Finally, how many DADUs are we expecting will be built under these new regulations? Enough to significantly impact the shortage of affordable housing? Enough so that it outweighs the risk to the livability of neighborhoods?

### **Do you have other comments or suggestions related to the scope of the EIS?**

Does this have to be an all or nothing approach? Why not 2 or 3 alternatives to the existing regulations? Why not the discussion of a phase-in approach? Why not a trial in one or more areas of the city first? And why has this

issue been so little publicized? I became aware of one open house, in Fremont, by accident. The space was too small to accommodate the attendees and then the presenters did not answer questions.

## Rebecca Craemer

11/12/2017 18:35

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

We are a small family who just bought a house in the Ravenna neighborhood. I'm writing about the owner occupancy requirement for ADUs and DADUs. We carefully did the math on a DADU and on many, many potential homes for an ADU. What we found is that it is simply not worth the investment of putting in the additional dwelling unit unless you (1) are comfortable living with a tenant and (2) plan to live long term in that home. Unfortunately, it is just not the nature of the labor market for us to commit long term, and it is very difficult to commit long term with children to living with tenants for most young families. If Seattle really wants more housing, they should make it financially viable for families like ours to maintain the property as a duplex. As it stands now, the rent is just about equal to the mortgage for our home, so unless it's a duplex it will only make financial sense to sell as a single family if we move, eliminating a potential dwelling. Removing the owner occupant requirement would allow for many families like ours to create more housing in high demand areas because you can count on the rent from more than one dwelling to maintain the property.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The parking requirements and lot size should be modified based on areas where there are actual parking issues and already pre-existing density. It simply doesn't make sense to have a one size fits all formula. The number of people issue should be more of a safety issue only, otherwise it is discriminatory against families, as a family like ours couldn't rent to another family. The one or two additional dwelling issue should really be considered through the frame of the total of rental dwellings that should be allowed per parcel.

## jean

11/12/2017 18:49

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think the lack of affordable housing in Seattle needs to be addressed. ADUs are a viable option. I think tiny homes (on wheels) should also be considered.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I agree with alternative 2, relaxing the guidelines to make ADU's a viable option

## Catherine Warren

11/12/2017 19:27

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

I support Alternative 2, which will allow more people to live within city limits and ease our severe affordable-housing shortage. I especially like the removal of the parking requirement. With fewer people owning cars, mandating

that each unit must have parking makes less and less sense.

## Shirley Nixon

11/12/2017 22:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS must include additional in-depth analyses of impacts on public safety and provision of emergency services if requirements for off-street parking are eliminated. Traffic congestion and blockages already occur with dangerous frequency on neighborhood streets that are effectively reduced to one lane because vehicles parked on both sides. The proliferation of delivery trucks on all city streets due to increased internet ordering and home delivery services must be measured and predicted, and mitigation measures developed. Emergency responders are and will continue to be unable to navigate clogged streets that were never intended to accommodate doubled and tripled residential density as being proposed here.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Michael M.

11/12/2017 23:56

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should consider the large environmental costs of not allowing housing to be built in the city. For every unit we don't build, one more family will live in the suburbs and commute. Per person, suburban detached housing uses more energy, paves over more land, and removes more trees than infill housing in Seattle proper. Additionally, long suburban commutes in single-occupancy vehicles are terrible for the environment. These very large costs should be considered when doing the EIS.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The city should not ban/restrict certain housing types when there are people such as myself that do not want to own a detached home and would prefer to rent an apartment or ADU. Why is my preferred housing restricted from being built in most places in the city, but you bend over backward to cater to detached housing dwellers? Why is that fair? I prefer that you remove housing restrictions, abolish zoning, and scrap this entire EIS process.

## John Barry

11/13/2017 9:48

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My introduction: I am a resident of Broadview as well as the owner of a second house that we rent to a family of limited means (one child at Viewlands, he works at a bike shop).

1. Reasonable range of alternatives
  - o Apodments along Greenwood. This seems to be the low cost entry point for housing in the city. This preserves single family zones which many of the apartment dwellers already take advantage of while walking their pets or strolling with their kids who come by and stomp in the puddles.
  - o Question: What has the effectiveness of ADU/DADU program in reducing housing cost increases and increasing race and social equity thus far?

2. Potentially affected resources and extent of analysis for those resources
  - o Increase of on-street parking will lead to increase in crime. Car break-ins.
  - o Deforestation. More owners will chop down their trees to make room for the ADU/DADU and increase value by giving the new structure a view of the water/mountains. I have always been a fan of the many large trees scattered across the Broadview neighborhood (additional raking taken into account).
  - o Proper vehicle registration. Many residents avoid the high car registration fees by registering their vehicles at a parent's house or other address outside the metro area. I would like to suggest that the car tabs be identifiable as to where they are registered. This was done with the monorail car tabs. It will encourage accountability of those who live here and take advantage of the resources our higher taxes enable.
3. Measures to avoid, minimize, and mitigate effects of the proposal
  - o Pedestrian safety. Broadview neighborhood has very limited sidewalks in our single family neighborhood. The proposed changes would force more cars to park on the street. With the absence of sidewalks pedestrians are forced further into the middle of the street with more cars parked on the street.
  - o Absentee landlord will significantly alter single family neighborhood dynamics. If the point is to allow more diverse demographics access to the quiet peaceful neighborhoods, then accountability must be maintained. To maintain accountability, the property owners must maintain residence (he/she needs to live on the property)
  - o I am concerned over the increased noise that will come with increased density. How will that be mitigated? In a similar vein, I am concerned over more pets poop and people smoking outside (because their lease doesn't allow smoking). I have an allergy to the smoke particles and to be honest, very few people enjoy other peoples smoke.
  - o Nuisance car alarms. This is made worse with more cars on street, increased car prowls, etc.
  - o How will the city prevent (or even limit) owners using their property for AirBNB instead of local housing?

**Do you have other comments or suggestions related to the scope of the EIS?**

**Joseph Pizzorno**

11/13/2017 10:33

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Reverse the changes in zoning that suddenly allowed so much higher housing density.

**Do you have other comments or suggestions related to the scope of the EIS?**

Essentially eliminating housing zone requirements is a terrible idea! The destruction of our communities all over Seattle is profoundly decreasing the quality of life for people who live here. I now see everywhere single family residents being destroyed and replaced with ugly multifamily high density buildings. The streets are now more crowded and people progressively less friendly. Why do you want Seattle to become downtown New York?

**Emily White**

11/13/2017 11:47

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Removing the owner-occupancy requirement will lead to landlords buying up and carving up large numbers of homes in single family neighborhoods. Profit will determine all decisions they make about keeping up the units and exterior,. It will completely change the architectural and neighborly character of our city. KEEP the owner-occupancy requirement!

**Do you have other comments or suggestions related to the scope of the EIS?**

Removing the owner-occupancy requirement will lead to landlords buying up and carving up large numbers of homes in single family neighborhoods. Profit will determine all decisions they make about keeping up the units and exterior, making them poor neighbors. It will completely change the architectural and neighborly character of our city. KEEP the owner-occupancy requirement!

**Gustavo Penengo**

11/13/2017 12:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

The new rules would create much better opportunities for design, current rules are too restrictive.

**Stewart Germain**

11/13/2017 12:33

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

As a resident of Columbia City I fully support the changes proposed in alternative #2. The additional flexibility is just enough to make ADU / DADU construction more financially viable, leading to much needed increase in density, particularly around light rail stations.

**Do you have other comments or suggestions related to the scope of the EIS?**

Identifying and implementing the changes a timely manner is critical. We have been "on the fence" for a few years, waiting to design/build our DADU

**Susan Bellan**

11/13/2017 12:51

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would appreciate the City understanding that people live in these neighborhoods you are talking about and that all items addressed should look at the impact on livability

**Do you have other comments or suggestions related to the scope of the EIS?**

I do have comments. To think that the City would actually entertain ADU's that do NOT require a person to be in residence on the main home on the property is, well - frankly - amazing! Basically, while the City is discussing the issue with AirBnB not being good for the City but then they are saying that people can build an ADU on their property and then - well - what, rent it? The intention of most people will not be to put their in-law in the ADU. The intention of most people who will take advantage of this new law will be to build two units, rent all three on their

property and simply make money. This is not a solution to homelessness, not a solution to density - it is simply a method by which you make the neighborhoods even more unlivable than they are already becoming. And, this doesn't even address the issue with parking and that impact. Honestly - it is great that Amazon has made this City "their own", but for those of us who a long time residents - we are actually considering our options to leave.

## Ross Budden

11/13/2017 13:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?  
Do you have other comments or suggestions related to the scope of the EIS?**

## P.R. Wickham

11/13/2017 13:15

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

NO to Proposed Accessory Dwellings for the following reasons:

- 1) Each Seattle neighborhood has the right to weigh in through the existing Zoning Changes Process on whether or not their zoned density changes
- 2) If the neighborhood residents agree to a zoning change, then only owner-occupied homes should be allowed to build. This would prevent real estate speculators from purchasing homes, building accessory buildings and (possibly) subverting the intent of this plan. There would also be more ownership of increased density for the neighborhood.
- 3) The Seattle City Council needs to manage the current homeless and low income housing (or lack thereof) BEFORE they attempt to take on more. There seems to be little oversight on the homeless/low income housing that Seattle is currently working with and on.
- 4) Seattle Gov't needs to stop allowing the Builders to pay a fee versus building affordable units in the buildings they are putting up all over the City right now. These Builders need to start putting a percentage of affordable units in EVERY building they are currently putting up. No exceptions and no more fees to get out of supplying this now. Seattle land is expensive and will only continue to get more so since we are land-locked. Seattle Gov't won't be able to buy any land with whatever fees they are collecting (and hopefully banking) on which to build affordable housing and still have enough left over to build quality, long lasting affordable housing. Also, the City of Seattle is NOT a Construction Company nor will they be able to build affordable housing as efficiently and economically as qualified Construction Companies can.
- 5) I live in a designated "steep slope area" that is also environmentally sensitive (Salmon runs). Increasing density without accompanying improvements to infrastructure is a recipe for disaster.

Everything rolls downhill...literally!

6) I would like our incoming Mayor Durkin and her team to reevaluate all existing housing proposals before the existing Seattle City Council does anything further.

7) Stop vilifying Single Family Residences and neighborhoods in Seattle. We have certainly paid enough property Taxes to have gotten a reasonable start on many housing issues facing our City. Utilize existing revenue sources appropriately and transparently. Goal and results driven.

8) The Seattle City Council needs to conduct Town Halls in each of the Districts during the Evening Hours when District residents can attend. Interactions within the City Districts

with the District residents might bring new insights and ideas to the City Council. Face-to-face is always better than email or voicemail feedback.

Thanks,

P.R. Wickham

**Do you have other comments or suggestions related to the scope of the EIS?**

**EB**

11/13/2017 13:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS must address the issue of increased waste water runoff that will surely result from increased lot coverage. The West Point waste water treatment facility is inadequate to handle existing levels of runoff, as shown by the catastrophic failure during what was an average storm in February 2017. Over the next four months, 230 million gallons of untreated waste water, including 30 million gallons of raw sewage, were released directly into Puget Sound. Fishery biologists at NOAA/NMFS recently reported that coho salmon are dying in streams feeding into the Sound before they have spawned, and that the death rate is directly related to the percentage of covered ground in the local area. The stated that the best means of filtering waste water is to allow natural drainage through compacted soil and gravel, as is found in backyards and parks. The consulting engineers brought in by King County in July 2017 to review the West Point collapse reported that the water treatment facility cannot support current levels of growth in Seattle. Any plan to increase density and ground coverage MUST address this critical issue of increased waste water runoff, and propose improvements in water treatment infrastructure to accommodate the increased runoff. Going forward with O'Brien's proposal without such discussion indicates that this is not a serious proposal and would make a sham of Council's pretensions to fostering sustainability and environmental quality.

**Do you have other comments or suggestions related to the scope of the EIS?**

Rather than increasing density and ground coverage in SF neighborhoods where there is still uncovered ground for water drainage, construction of high density "affordable" units should be concentrated in areas already developed with covered ground. I think that it would be better to build 10-20 story apartment buildings along Aurora, Lake City Way, and SODO, and mandate that most of these units be affordable. These corridors already have excellent access to transit. New construction can include retail on the ground floor so that residents don't need to drive to do their shopping. These areas are already environmentally compromised, so the impact of density there will be less drastic than if large amounts of remaining open ground and water drainage in SF neighborhoods are removed for new construction. Construction in these existing transit corridors also provides an opportunity for urban renewal of these marginal areas. With the development of new retail and pedestrian zones, this areas could enjoy economic revival.

The owner requirement should NOT be removed for ADU/DADUs. There is no good argument for doing so. Requiring that owners live on site will prevent developers from decimating neighborhoods by tearing down existing family housing and replacing it with multi-story, multi-occupant rental units. If you want this proposal to be taken seriously as an effort to increase affordable housing stock, then retaining the owner requirement is a good-faith measure to reassure residents that this isn't just a quid pro quo to developers for the sort-of mandatory requirement that they include or pay for some affordable units in their construction. Removing the ownership requirement will confirm the suspicion among many Seattle residents that O'Brien and other Council members are

beholden to developers.

Another good faith step to reassure Seattle residents would be to phase in the ADU/DADU proposal gradually by maintaining the current restriction that only one accessory unit per lot can be built, and by the owner, while easing up on parking requirement. Before undertaking a wholesale, irreversible replacement of SF housing by multi-occupant rentals, start with a gradual change (ONE accessory unit, off-street parking not required, only approved for resident owner), and let's see whether there is a surge in construction of such units. If after 5 years the capacity for ONE accessory unit per lot is saturated, and these units prove to be affordable, then we can discuss expanding the program to allow two accessory units per lot. A rush by Council to dismantle the current one accessory unit/owner ordinance would be widely seen as a sell-out to developers and nothing more.

## Becky Lenaburg

11/13/2017 13:18

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I do not support the removal of the owner occupancy requirements from the proposal regarding ADUs. Essentially the removal of this requirement will pave the way for the destruction of current smaller single family homes, largely homes that are more affordable, and turn decisions on development over to developers who do not live in the neighborhood or care what the consequences of their development are. The EIS does not address those issues.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Please consider the effect of the proposal on the appearance and environmental health of the neighborhoods, such as would tree removal be necessary, enforcing set backs, sidewalks or lack thereof, building materials, height limits, amount of developable area - none of these are sufficiently addressed. The owner occupancy requirements should not be removed. Nor should the minimum lot size be reduced or the or the rear coverage limit be increased. All of those changes are detrimental to the environment of the neighborhoods.

## Robert Heller

11/13/2017 13:19

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

This is the second comment I am submitting for the EIS Scoping process. It is essential that the EIS thoroughly address all of the issues raised in Hearing Examiner Decision W-16-004. The Hearing Examiner identified a number of issues requiring environmental analysis. The EIS should specifically provide data and analysis to respond to questions and issues raised in Conclusions 9, 10, 11, 12, 13, 14, 15 and 16 of the Hearing Examiner Decision. In addition, all other sections of the Decision should be reviewed to determine if they present other questions and issues which must be addressed in the EIS.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Short-term rentals such as AirBnB have potential for very significant income to the "hosts" providing such short-term rentals. The EIS must analyze to extent to which the proposed action may result in development of new dwelling units for short-term rental use, or conversion of existing dwelling units to such use. The overall relationship between the proposal and the potential for short-term rentals, especially regarding property costs as a function of rental income, must be thoroughly investigated. A number of comments have addressed concerns that the proposal would actually cause property prices to increase in certain neighborhoods due to purchase by investors/speculators. The potential for short-term rentals is certainly part of the economic equation that must

be considered.

## David Pope

11/13/2017 13:21

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

#### **Do you have other comments or suggestions related to the scope of the EIS?**

I am against doing away with the owner occupied requirements for accessory dwelling units in single family neighborhoods. As a life time resident of Seattle I see the need for more housing but not at the expense of single family neighborhoods. We need to support our single family neighborhoods by encouraging owners to increase housing units without tearing down existing housing by developers who only aim is to make money and leave without a stake in the neighborhood. I believe this will happen if we get rid of the owner occupancy requirements in single family neighborhoods. A diversity of neighborhoods is necessary for a livable and affordable city. Density should be concentrated in the core of our urban villages with less density in surrounding neighborhoods to support families. Please don't bow to developers who don't have any stake in our single family neighborhoods. Rather help the current families stay by giving them options for additional units which might help them offset the rising cost of living within Seattle.

## Kate Cunningham

11/13/2017 13:52

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I fear that developers will find loopholes and build with disregard for existing neighborhoods.

The topic of absentee landlords building and renting these unit should be extensively explored.

I think the owner occupancy is fundamental in maintaining a local and responsible building owner as a member of the neighborhood.

What if we keep the owner occupancy requirement?

How many units would we get if we still required owner occupancy?

What other restrictions could be in place for absentee landlords such that they are responsive to the neighbors - the way that a homeowner is responsive to her neighbors?

#### **Do you have other comments or suggestions related to the scope of the EIS?**

I support option 2 to increase density in all the neighborhoods. I myself would like to build a DADU; and I already have an ADU.

I support the no parking requirement in all SF areas and RPZs. Is there a way to incentivize homeowners and tenants to adopt a carless ownership lifestyle?

## Michael J Fies

11/13/2017 14:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

My concern is the obvious degradation and devaluation of my personal property if the proposed changes are allowed to impact our homes and way of living. Trees will be removed, sight-lines currently existing will be lost forever, quality of life on our properties will diminish severely, parking which is already difficult will become more chancy on a regular basis or impossible----all problems which are completely unnecessary if the proposal is not adopted. Government works best when it solves problems, not makes them worse and for existing property owners the proposed changes are worse. What are the results of the EIS conclusions for the changes?

**Do you have other comments or suggestions related to the scope of the EIS?**

I refer to the Queen Anne submission as a very professional and well thought out response in opposition to the proposed changes.

**Richard White**

11/13/2017 15:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I support the concerns raised by the Queen Anne Council. The requirement that owners occupy one unit must be kept to avoid neighborhoods being taken over by landlords instead of home owners. Furthermore, 3 units could mean 6 cars per lot even while the new law allows the garage and its 1-2 parking spaces to be converted to a unit. This will clearly impact the neighbors' ability to find parking in front of their own house.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support the concerns raised by the Queen Anne Council. The requirement that owners occupy one unit must be kept to avoid neighborhoods being taken over by landlords instead of home owners. Furthermore, 3 units could mean 6 cars per lot even while the new law allows the garage and its 1-2 parking spaces to be converted to a unit. This will clearly impact the neighbors' ability to find parking in front of their own house.

**Frank Buono**

11/13/2017 15:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Retail all single family residences

**Do you have other comments or suggestions related to the scope of the EIS?**

I only want Alternative # 1 no compromises

**Martins Blums**

11/13/2017 16:46

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Would like to add the following: (a) clearly calculate impact on parking in the city and traffic, (b) impact on pollution and biodiversity, (c) city's environmental goal to become carbon neutral, (d) impact on housing increase by price ranges, (e) what is the impact on non-resident ownership share of Seattle's housing.

**Do you have other comments or suggestions related to the scope of the EIS?**

The proposal claims to address housing availability and affordability. I request an Option 3 that would allow to address these issues more effectively. Both Queen Anne and Magnolia Communities have proposed better suggestions. The reason why I think the existing proposal is harmful is because it will increase housing only at the higher income groups (\$650K+) not addressing housing shortage where it is needed, it will increase congestion and pollution. In fact it will increase prices because it would drop owner occupancy requirements. I strongly request a third option that doesn't effectively eliminate all single family housing in Seattle

**Mathew Dailey**

11/13/2017 18:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please do NOT allow this zoning to move forward. I have been a homeowner on Queen Anne hill for more than 20 years. I located here because of the neighborhood, which is predominately single family. Do NOT ruin our neighborhood.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Valerie Wonder**

11/13/2017 21:18

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Yes - I support Alternative 2, especially the shift towards allowing both AADU and DADU on the same lot, removing the owner occupied requirement and allowing for larger DADUs. I also would like to see the City...

--Provide financial incentive and/or tax credits for homeowners who rent out their ADUs at below market rate.

--Offer small loans to reduce financial barriers to construction, and/or offer grants with requirement that homeowners offer a certain # of years of affordable rent.

--Offer incentives for green building/solar panels etc in construction plans

--Drop the lot size requirement from 3200 to 2800 sf (perhaps with smaller max size in these cases).

--Allow backyard building to be the main residence if existing structure is under 1000 sf.

--Reduce setback requirements even further.

**Dan Luong**

11/13/2017 22:43

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

The owner occupancy requirement is too restrictive and doesn't allow for life changes from the moment they buy a property with, or add an ADU. This only works for a small set of old homeowners that can afford to add ADUs, but not for anyone else who may change jobs, have to move, or any other life changes. Owner occupancy and will

not make building or adding ADUs worthwhile and will make the affordable housing situation in Seattle worse.

## Pauline Garstang

11/14/2017 10:07

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see a review of public school capacity, community center services, availability of parking and availability of public transport to meet the needs of the increased population as a result of the increase in ADUs.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Kyle Phelps

11/14/2017 11:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am for the original proposal. Upon approval of the legislation I plan to start working on a DADU myself.

## robert vets

11/14/2017 11:43

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

traffic congestion. specifically traffic congestion. ADUs/DADUs WILL (WILL) bring more cars to already difficult to access neighborhoods (the arterials are already burdened). For the assessments to be FAIR commute congestion needs to be more heavily weighted than normal SDOT procedures.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The owner occupied requirement should be assessed in BOTH scenarios - this is HUGE. Not requiring owner occupation will result in developers cheating the process to create townhome alternatives...they are already do so without permits. BTW, if this whole thing is to increase housing stocks - it won't.

## Cheryl Felak

11/14/2017 12:29

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the owner-occupied stipulation to remain - I think it is important for stability in the neighborhoods rather than having rentals crammed in together.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I live in the U. District and am curious about "duplexes" around my home - is the duplex the same as an ADU? Are the rules the same?

## Matt

11/14/2017 12:36

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like to see how we can increase density in urban villages AND in Single Family zones via ADUs. I would also like to see the permitting process expedited and parking minimums removed. I would also like to see us get aggressive the heights allowed.

### **Do you have other comments or suggestions related to the scope of the EIS?**

This is a HUGE way we can make Seattle more affordable for all. If we can take existing backyards and lots that currently do not allow ADUs because of outdated zoning code and allow housing to be built. Let's think big and be visionary to make an inclusive Seattle for all!

## Jessie Culbert

11/14/2017 12:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please remove barriers to the creation of ADUs and free up unused backyard space as a source of affordable housing and income for homeowners.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Consider regulation of short-term rentals to give priority to long-term tenants or eventually owners of small homes.

## M. Reinhardt

11/14/2017 13:26

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Enforcement - The City does not have the resources to properly enforce the existing regulations about ADUs. Proponents of ADUs brazenly talk about how they violate the regulations with impunity. The City needs to adopt a regulation allowing private citizens living within 2000 feet of an ADU to bring a private right of action to enforce the ADU regulations against violators.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Jason Petrait

11/14/2017 13:41

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

### **Do you have other comments or suggestions related to the scope of the EIS?**

Move it forward! We need more housing of all types, and these little places aren't an environmental concern.

## George Wilhelm

11/14/2017 13:53

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

YES! everything about this proposal concerns me, the results of this proposal are poorly thought out, lack of parking requirements, lack of requiring owners to live on property, lack of restrictions on commercial use of the property, and a lot more. Why are we wasting taxpayers money even studying this proposal?

### **Do you have other comments or suggestions related to the scope of the EIS?**

## Michael Kaiser

11/14/2017 14:24

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Study of potential for speculative real estate development on single family lots affected by Alternative 2.

-What are the likely loopholes to be exploited by developers, and what does that mean for existing building stock?

-What is the code-driven form of future development on these lots?

-What is the cost (in dollars) of maximizing an 'Alternative 2' lot, and what does that mean for affordability of housing on the property?

-If we are going about this in the name of affordable housing we should be able to see a range of realistic development scenarios.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am pleased to see that the City will be doing a proper EIS this time.

I am pro-density and pro-growth, and I recognize that the City has to change. My concern is that this is too much, too soon.

-I question whether we can add this much density, this quickly, without proper transportation options in place. The current transportation options do well at getting people downtown (slowly) but they are inadequate for the needs of families who have obligations all over town.

-I am also concerned that this does not take into account the reality of family life. We are making more small units, at the expense of larger units that a family needs to live close-in to the City. We need more 3+ bedroom places close to the City center. --Until the City does something to require developers to implement a mix of unit sizes in urban areas, we should not be going after single family homes. Single family homes fill a need for families, which is part of the reason why they are in such high demand right now.

-Lastly, we need more condominiums--for small families, or for people who don't need a single family house but want to invest in real estate rather than renting. Other cities manage to build condos, but our developers say they are turned off by political, legal and economic reasons. Let's address those, before we go after our high-functioning single family neighborhoods.

My family and I support density and growth, and we oppose Alternative 2.

## Rick Mohler

11/14/2017 15:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS is an opportunity to consider alternatives beyond those currently proposed under Alternatives 1 and 2 as follows:

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to being gradually downzoned over the past half century. In addition, the term 'single family' ceased to accurately apply to these neighborhoods upon the allowance of ADU's in 1994.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay - Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Provide exceptions for handrails and parapets over height limit.
- Decks over 18" and covered areas should not count toward accessory use square footage, but should have a separately calculated limit.
- Allow separate metering of utilities.
- When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to required setbacks.
- Allow extra height for flat roofs when used as a green roof.
- Use Floor Area Ratio to restrict the size of development and incentivize additional housing units. Currently, many modestly sized homes are being demolished to make way for very large single family dwellings. For example, on a 5000 SF lot, with lot coverage at 35%, and a height limit of 30' the code currently allows a 5250 SF house. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR could provide a disincentive for the construction of large single family dwellings and incentivize the construction of dwellings with mix of sizes and prices.
- Allow split ownership of lots with an existing house and new cottage, using a fee simple subdivision or similar mechanism, provided the cottage was legally established. Allow condominium-like agreements to facilitate

shared lot ownership between the existing house and new cottage. This could help to address the lack of starter homes in the city due to the high cost of land coupled with minimum required lot sizes.

- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.
- Allow a required off-street parking space to be accommodated in a driveway in a required front yard. Parking in the front yard is currently only allowed for non-required parking (additional vehicles) creating an incentive for car ownership and reducing the flexibility for off-street parking.
- Waive the required side yard setback for DADUs with an agreement between neighbors as is currently allowed for detached garages. This would allow adjacent neighbors to jointly construct two DADUs with a shared wall thus reducing costs as well as the impact on rear yards and neighboring properties. This should be considered for required rear yard setbacks as well.
- Acknowledge that lot area and width are not the only measures of a parcel's development capacity. Corner parcels and parcels with alleys have more development capacity than infill lots without alleys. The single family land use code previously acknowledged the increased development capacity of corner lots by allowing increased lot coverage based upon the width of the adjacent right-of-way. Consider expanding lot coverage for DADU's on corner lots and lots with alleys in response.

#### **Do you have other comments or suggestions related to the scope of the EIS?**

The successful appeal requiring that the city conduct an EIS of the proposed ADU/DADU legislation is an unfortunate turn of events. The 1970's legislation guiding the EIS process is profoundly out of date and, as a result, can yield a conclusion diametrically opposed to its stated intentions. The study will focus myopically on the immediate and adjacent impacts on parking, vegetation, solar access and aesthetics of Alternative 2 without taking account of broader regional impacts related to urban sprawl, loss of tree canopy, carbon emissions as well as regional housing, transportation and infrastructure costs of Alternative 1 (no action). While the EIS is unlikely to take any of these broad environmental and social impacts into account it will not preclude the city council from doing so in its review of the study.

#### **Edie Birk**

11/14/2017 15:50

#### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. You are proposing an "all or nothing" change with only the two options. I want to see a third option that retains owner occupancy but eliminates the parking requirement. But at least offer something other than a highly restrictive option and that silly bit of nonsense as a second option - there has to be something possible in between those.

#### **Do you have other comments or suggestions related to the scope of the EIS?**

#### **Alexandria Gray**

11/14/2017 18:56

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Please preserve the parking and the owner occupancy requirements. More ADUs will help the city's housing crisis, so I do want to see the regulations open up, but not at the expense of making the parking situation any worse.

**Eva Masumoto**

11/14/2017 19:03

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking. What is the answer to additional renters further impacting street parking?

Please publish the projected average rent of these additional units... I work with homeless families directly and I predict that the rent of these newly built units will be out of reach. Ask Mary's Place what families who are transitioning to housing are actually paying. Most are moving to the Tukwila area. The ambition to change these codes for homeless families is just propagated by developers. This only helps developers and landlords. Who is promoting this? Developers and landlords.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am very concerned that the owner of the property does not have to live on site. This is a huge detriment to single family home neighborhoods where people own and care for their property. PLEASE do CHANGE this so that owners must live on the property. THIS will mark the beginning of the decline of Seattle neighborhoods, as renters do not care for properties as an owner would. Neighborhoods will become too crowded, with NO parking, and developers who don't care about the state of our neighborhoods. Please do not do this.

**John Benavente**

11/14/2017 21:11

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

No

**Do you have other comments or suggestions related to the scope of the EIS?**

The alternates are extreme opposites. Where is middle ground? for example, alternate 2 (my preferred alternate): why can't it require 1 parking spot (for either the DADU or ADU)? Why can't it require it to be owner occupied? These are extremes, where is the middle ground? People who don't want an increase in density in SF zones will be forced to like alternate 1; people who are more moderate will be forced to select alternate 2, but may not because it seems way too developer friendly. Do we want international/national home buyers to start taking advantage of this? what was wrong with the owner occupied provision?

**D West**

11/14/2017 21:55

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

As an incentive, reduce the cost of hookup to the sewer system

Allow increased size

Keep setbacks

Do not allow absentee landlord

Allow both ADU & DADU on one property

Move decision process along!

Subsidize affordable standardized prefabs; clustered engineering & foundation pours/neighborhood clusters

Require on-site parking if the street merits it due to lack of available parking - don't make that cookie-cutter - allow DADUs parking exemption on streets that have space

**Do you have other comments or suggestions related to the scope of the EIS?**

**d west**

11/14/2017 22:03

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

max 8/property

**George Ostrow**

11/14/2017 22:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. Allow ADU, DADU, and SFR to each be independently owned, bought, and sold, using Unit Lot Subdivision mechanism.
2. Treat all space the same towards max square footage. So conditioned space, "storage," garage, porch (with a roof, which will get enclosed), basement, loft, all count as square footage because in effect they are all used as habitable square footage. However, balconies, decks, and other roofless surfaces are not habitable square footage, because it rains a lot here.
3. Would be ideal to triple unit density in SF zones by allowing ADU and DADU on same lot. This method of "stealth" densification does not change the physical appearance of the building from the street. In stark contrast to demolishing a house and building a townhouse four pack.
4. Would be a shame if removing barriers led to mass demolition of existing bungalows. So buildings built before 1940 can only grow towards the back or down below grade, not out towards the side or front or up, to preserve bungalow neighborhood character. Properly, ADU goes in basement and DADU goes in rear of existing bungalows. There are thousands of old bungalows which can readily accept ADU in basement and DADU out back.
5. Enable minor attachments (less than 5 feet wide) of DADU at all floor levels, not just ground level.
6. Goal of initiative is to increase affordable housing for people, not for their cars. The best zoning change Seattle ever made was to eliminate mandatory on site parking.
7. Goal is to create space for dwelling. Yes some will rent out short term as AirBnB. But long term tenants are a lot

less effort and over time owners will tire of the AirBnB hassle.

8. It's not just zoning or market forces. Building code requirements for fire separation, isolation of heating and electrical, acoustical separation, and so forth create unnecessary cost burdens that discourage ADU and DADU.

9. Substantial Alteration upgrades should not be triggered merely for creating an ADU.

10. Portland OR and Vancouver BC both have vigorous D/ADU programs. EIS absolutely needs to examine what those cities do, what their rules are, what the built results are, what works. No need to reinvent the wheel.

**Do you have other comments or suggestions related to the scope of the EIS?**

Primary task of new D/ADU legislation is to regulate what gets built. Not how people treat each other. Not how much they charge for rent. Not if they drive a car. Not if they share a heating device. Focus on what you want built (and not built) and leave the rest be. What gets built will be around for decades or a century. Who lives there and how they live there can and will change, as it should.

**Aaron Piper**

11/15/2017 8:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Infrastructure around more density.

**Do you have other comments or suggestions related to the scope of the EIS?**

Nope.

**Jo Seuk**

11/15/2017 9:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Where it relates to DADUs, the definition of "rear yard" should be expanded to include all areas of the lot that is not within the required 20 foot "front yard".

Single family homes that have existing detached garages in front of the main dwelling structure, but set back greater than 20 feet from the front lot line, should be considered as viable candidates for dadu conversion. As a side benefit, these garages would also get updated and improve the look of the neighborhood.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Christina Purdy**

11/15/2017 10:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

As an owner of a registered ADU, I support the concept of allowing an additional ADU or DADU. However, in the interest of maintaining the "single family" feeling, I would like to see the owner occupancy requirement retained. Having an ADU (or two) helps individual owners pay the mortgage while keeping a personal interest in the quality of the neighborhood. Allowing absentee landlords in a single-family neighborhood seems like a good way to

gradually cede the neighborhood to bigger landholders.

## Heidi Charleson and Lou Woodworth

11/15/2017 12:08

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

We strongly oppose the proposed rezoning to 3 residences on a single family lot. This is classic Seattle "social engineering" without addressing infrastructure and the deleterious impact on neighborhoods. A "one size fits all zoning policy" is the wrong approach for a large metropolis like Seattle.

I am a Queen Anne resident and am keenly aware of the serious degradation of our streets and sewers as well as our maxed out parking. The extensive proposed zoning change will only exacerbate the problems.

In addition, existing zoning laws already offer opportunities for development which are not being utilized. i.e. there are many L1 and L2 zoned lots which currently only support a single family dwelling. In Danny Westneat's 2015 Seattle Times article he sites "there's enough capacity under current zoning to add 224,000 housing units — 73 percent more than the current stock of 308,000"

Clearly the City Council should take a harder look at finding ways to increase housing without destroying Seattle's unique and desirable neighborhoods.

As a comment, Aurora Ave is a seriously overlooked area for housing development. As with Dexter Ave it has good public transportation, close access to the downtown, and would benefit from a "clean up" of prostitution and drug dealing.

Further, no tree grows to the sky and Seattle won't always be beneficiary to such explosive growth. Companies leave due to negative conditions; traffic, taxes, recessions. Prudent planning is essential.

In summary, the City Council needs to do a lot more "due diligence" in pursuing already existing zoned housing options rather than taking a "knee jerk approach" which will have future negative consequences.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## chrys kim

11/15/2017 13:20

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Full steam ahead Alternative 2 and beyond. We need more housing so Seattle stays a mix of generations, incomes, races. It will be much less boring.

Specific code suggestions:

1. Ease zoning envelope & location rules: Location of: existing small house in front becomes the DADU with larger house (30'/35' height) in back when SF rear yard abuts NC. This type of flexibility is to address privacy for both DADU owner, and the adjacent neighbors. Flexibility is critical for design of privacy, and seems to be one of the biggest issue with the "no" camp, including my street on N. 84th in Greenwood. Allow height flex for built privacy structures/screens, similar to fence height guidelines (not just plants).

2. When adding above Garage, ease 5' side setback, as most garages are 0' to 3' away from property line. Having

to shift 5' creates a small area that needs to be roofed. Allow to go straight up as long as enough width between Garage wall and structure on side of neighbor property.

3.If removal of parking become issue with another round of pushback, allow parking spots in front/side/rear set-backs.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Wider perspective from Portland seminar and beyond:

1. Education of general public on financial benefit/flexibility of & helping ease displacement of POC, elderly , Asian intergenerational structure (which still exists - moms want to stay in their neighborhood with people and neighborhood they know, not move (Wedgewood, Greenwood, Seward, Hillman, Beacon).
2. Cost. Initially ease costs/help owners build/financial incentives possibly for single parents/retirees/limited income group. From Harriet Tregoning - "using people who have equity in their home to build more housing" and "use of building more (adus/dadus) for disaster relief/displacement during, but after that, it increases the amount of housing supply". Other cities: Look to CA & Portland, DC how they reduced cost. Even people with most of the cash on hand are having a hard time deciding to build. Homeowners are the best bet in increasing low impact housing all around Seattle SF zones, one step up from Favellas!
3. Study & present positive impact on single family zones if allowed traditional residential uses (duplex, triplex, cottage clusters, corner stores, which used to be legal. Friends and neighbors with kids living in SF neighborhoods WISH these came back.
4. Get the positive word out: use of local media & organizations as part of educating, on the positive impact of change, a coalition similar to Portland.
5. Laws: Make changes at state level to build ADUs as a right, like California. Met many people outside of Seattle (Edmunds, Kirkland, Bellevue, Bothell) all close to retirement who wanted to build but neighbors objected.

## **Sabina Pelckmann**

11/15/2017 14:02

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

I have an existing ADU/mother in-law bsmt apt. I am 100% in favor of loosening some of the present regulations. I'm just listing four of the categories that are probably the most controversial.

Since I'm a designer I always look at the aesthetics and how the DADU's will/need to fit into the existing neighborhood and retain a light foot print. That is why I would advise creating a design commit to review any DADU proposed with the criteria that they would be in scale with the neighborhood.

- 1.Yes. Allow both an ADU and a DADU on the same property.
2. NO. Keep the homeowner requirements as is. If a homeowner is not required to live on the property it opens homes up for investors who have no interest in maintaining the character of the neighborhood and are only in it for the profits.
- 3.Yes and No. Require off street parking whenever possible and on a case by case basis.
4. Yes. Increasing the size requirement on DADU but with a design committees approval.

**Do you have other comments or suggestions related to the scope of the EIS?**

I do think there is some confusion by those who only hear "loosening regulations" and are concerned about over building.

WE ARE NOT PROPOSING TEARING DOWN OLD HOUSES TO BUILD 20 UNIT APARTMENTS. This proposal retains the character of neighborhood by allowing the homeowner to stay in their home and age in place or accommodate elderly parents or growing families. The proposal utilizes what is already existing (ADU) in the house. DADU's are small scale buildings (usually just a garage add on) with well defined height and lot coverage requirements that are intended to leave a light foot print.

**Joe Luckeyt**

11/15/2017 14:33

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

higher heights dadu's for 2 stories

**Do you have other comments or suggestions related to the scope of the EIS?**

Home ownership is the American dream and that dream is in question these days. We as a city and a society need to step forward and change the building code to give people a chance at pride of ownership.

Imagine ; if a couple were lucky enough to purchase a home before the prices went up so and started a family. In the event of a break up in the marriage the couple could establish a livable DADU in the back yard and both parents could live on the same property instead of one living in an apartment in Kent and the other in Everett sharing the transfer of kids on the weekends and clogging I-5.

Imagine if If you are getting along in years and you need some extra income. You could either take out a reverse mortgage that would quickly eat away at your equity or you could go into a partnership with someone that would purchase your unused backyard space and build a DADU. The two of you would own the property in a co-op arrangement sharing a pre determined neighbor lot line. That way each property partner could sell their portion if they needed to. Layers could work out all the other details. If Seattle wanted to, they could go a step further and create a separate tax lot for the DADU portion.

Hardly a day goes by without someone talking about Seattle's housing crisis. The frustration of price and low availability has moved many hopefully city residents to get on the freeway and head either North or South to find a home. That freeway congestion has to be reason enough to enact an alternative to Seattles archaic zoning codes and provide for alternative city living options.

The developers have had ample opportunity to convert their properties into mega apartment units but Seattle's homeowners have been stalled in their attempt to help provide housing solutions.

If you already own a home in Seattle you know what it's like to have a piece of heaven. If you don't, that hope for home ownership is but a distant dream plagued with high cost and endless offers and beg letters.

Seattle can help to solve this problem by taking an aggressive approach to opening up the barriers to development of single family properties. I approve of the proposed changes with respect to enlarged DADUs. This would provide the opportunity to build a structure that could be large enough for two bedrooms that could accommodate couple or a small family.

## Celeste McDonald

11/15/2017 14:45

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

ADUs seem like a great opportunity to expand affordable housing in the city without changing the aesthetic or accessibility of the city.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The City should follow the "Beyond Backyard Cottages" [1] recommendations to ease the construction of affordable units. This includes joint construction of backyard cottages on adjacent properties.

The City should study a third option: change Single Family Zoning to Residential Small Lot to determine the impacts of allowing small scale affordable development throughout the city.

Residential Small Lot development reflects the historic built environment which includes many houses on lots smaller than 5000 square feet, the minimum size required in current single family zones.

[1] <https://medium.com/@matthutchinsaia/beyond-backyard-cottages-10-ideas-to-address-seattles-housing-shortage-94eac2c22901>

## Marilynn Carlson

11/15/2017 14:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

My concern is how alternative 2 would reduce the quality of life in neighborhoods zoned for single families. We already have a parking problem in my neighborhood and the proposal would make it much worse. I would like to maintain the requirement for an owner to occupy one of the dwellings and to have off-street parking included on the property. Alternative 1 is a better balance between increasing density while maintaining quality of life. Alternative 2 goes TOO FAR TOO FAST.

### **Do you have other comments or suggestions related to the scope of the EIS?**

My concern is how alternative 2 would reduce the quality of life in neighborhoods zoned for single families. We already have a parking problem in my neighborhood and the proposal would make it much worse. I would like to maintain the requirement for an owner to occupy one of the dwellings and to have off-street parking included on the property. Alternative 1 is a better balance between increasing density while maintaining quality of life. Alternative 2 goes TOO FAR TOO FAST.

## Ryan Lum

11/15/2017 17:00

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

An argument against ADU's is that density would rise and neighborhood character would change.

First, we would like you to address whether or not density would rise. Is this historically something that has happened when ADU development has been encouraged in other cities? Provide evidence to support how likely it is that density would rise.

Secondly, please define neighborhood character. Specifically address what aspects of the "Neighborhood Character" community members are concerned with (Educational institutions, economic, etc.)

Can DADU's be annexed from land and sold as it's own property?

Will increased ADU's result in increased tax revenue for the City of Seattle? If so, how will this tax money be allocated. Will there be tax incentives for making ADU's affordable?

Will there be green building standards for ADUs?

What is the strategy moving forward with Air Bed and Breakfast and other similar organizations?

**Do you have other comments or suggestions related to the scope of the EIS?**

We would like to see public projections for the number of properties that would be eligible to build new ADUs, followed by the likelihood that they would or would not be built given the cost of building and family income within a given home. If a property meets the requirements to build, but does not have the means to, will this still have an affect on their property value?

Which ADU alternative suggestions could have the most negative impact on the environment? Which alternatives will be the most likely to be a catalyst for increased ADU construction?

Suggestion: Preferred list of companies to be sourced for ADU construction.

**Judith Malmgren**

11/15/2017 17:05

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

In re the EIS. The allowance of increased density via ADUs and DADUs are the following: 1) degradation of watersheds by decrease in green space and increase in impervious surfaces, 2) overloading of the already maxed out stormwater system which will over load the system resulting in sewage outfalls of huge proportion as occurred at the West Point Sewage Treatment plant last year which pollutes Puget Sound 3) overloading of our out of date and degraded city sewer system endangering the health and well being of home occupants and renters, 4) increased road pollution due to increased cars in neighborhoods that drain to watersheds (Carkeek, Piper's Creek, Thornton Creek) which affect the fledgling salmon runs restored by the Greenwood/Broadview/Blue Ridge communities. We live in a delicate ecosystem that needs constant vigilance to preserve. Let's not let our Mother Earth down in a misguided attempt to supply 'affordable' housing.

**Do you have other comments or suggestions related to the scope of the EIS?**

Increasing density in L3 and other areas with good transportation options and requirements that the housing be used for long term rentals not VRBO or AIRBNB are viable alternatives.

**Judith Malmgren**

11/15/2017 17:14

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am opposed to the removal of the owner occupancy requirement. It invites large corporations foreign and domestic to profit off single family neighborhood properties with speculation for the future. It removes individuals on lower incomes like teachers and public safety workers from the already scarce 'starter' homes available in

Seattle further increasing competition for a scarce commodity. It degrades neighborhoods we value for raising families and supporting our schools. The very small size allowed for the DADUs and ADUs make them unsuitable for families with children.

If 2500 DADU/ADU units were built in Seattle with the lower standards it would address .02% of needed housing given the annual influx of people moving into Seattle. It is not the responsibility of the citizens of Seattle to provide housing for employees of large corporations with billions of dollars of profits. That responsibility lies with the corporations and the city that has allowed irresponsible growth.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jennifer**

11/15/2017 18:37

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes - the impact on families with children - more density is not a solution for families who have heavily invested in this neighborhood of Wallingford

Also, as a homeowner, I deserve to have property safe from developers building large multi-plexes on their land, or towering dwellings that impact my privacy. I bought a house with expectations that my neighborhood and city block would not be up-zoned

**Do you have other comments or suggestions related to the scope of the EIS?**

The impact increased density has on well-being, crime like domestic disputes, sex offenders moving in too close to families and children and overall traffic increases and the risk of more cars in neighborhoods full of kids. Our city has a plentitude of services and stores and schools and playgrounds for children making this city unique and lovely. We owe it our residents who pay the bulk of taxes through property taxes to have a fair say and foresight into how we design our neighborhoods

**Al**

11/15/2017 19:06

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

What about sewage? One real estate person commented already that we should pay more attention to infrastructure problems before we put more density on top of our iffy sewage treatment problem and our traffic jams. I chose to live in a neighborhood where the wind goes whipping through pretty fast, and so I don't smell the problem, but I know it's there, and the sea life creatures know it too.

I am in favor of owners being required to live on site even though it would give me more freedom not to have that requirement. Right now my neighborhood is about average in the level of maintenance we all give the yards and paint jobs etc. I'd be disappointed to see it go down below where it is now just because some distant investor wants to make more money.

I could use some grant money to help make it possible to rent out the extra space.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Bill Badgeley**

11/15/2017 19:49

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Percentage of out of state ownership of Seattle property and the drain on local funds to non-local investors.

**Do you have other comments or suggestions related to the scope of the EIS?**

The EIS is based on two possible answer to a one-size-fits-all proposal. As such, it is inherently limited in its ability to address diverse location realities and concerns. I understand we need to be able to increase our housing base, but I think the City needs to include the neighborhoods and possibly sub-neighborhoods in how this may be accomplished. Challenging an EIS to manage change feels childish.

**Matt Hallett**

11/15/2017 20:26

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Only one alternative is presented for this proposal. At least two alternatives to accomplish the objective are required.

The objectives for this proposal are not clear.

Better objectives might be more affordable housing, more family housing, preservation of tree canopy and yards, and development compatible with existing single-family housing.

I want to see more about the actual impacts of this proposal on neighborhoods, public services, and natural resources.

There isn't enough here on Measures to avoid, minimize, and mitigate the effects of this proposal.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Matt Hallett**

11/15/2017 20:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The objectives in the EIS of the proposal should be to increase affordable housing units, to increase family-size housing units, to preserve the tree canopy and green-space, and to require development compatible with existing single-family housing.

The EIS should study an alternative that keeps the existing owner-occupancy requirements, while removing the parking requirements and changing the development standards for size and location of DADUs.

The EIS should study an alternative that keeps the existing owner-occupancy requirements and parking requirements, while changing the development standards for size and location of DADUs.

The EIS should study an alternative that keeps the existing owner-occupancy requirements and parking require-

ments and ADU size requirements, while changing the requirements for lot size and location of DADUs.

The EIS should study an alternative that keeps the existing owner-occupancy requirements and parking requirements and ADU lot location requirements, while changing the requirements for size of ADUs.

The EIS should study an alternative that keeps existing requirements for lots under 10000 SF, while changing the requirements for larger lots.

The EIS should study an alternative that keeps existing ADU requirements, with the City financing the King County Sewer Capacity fee for a DADU in exchange for that unit being an affordable rental housing unit in the City's Housing program.

The EIS should study an alternative that keeps existing ADU requirements, with the City financing ADU "in-law apartment" redevelopment in exchange for those units being affordable rental housing units in the City's Housing program.

The EIS should study an alternative that keeps existing ADU requirements, with the City developing neighborhood pre-approved plans for DADUs on different lot sizes.

The EIS should study the impacts of real-estate speculation in ADU rentals on affordable housing.

The EIS should study the impacts of AirBnB type short-term rentals for ADUs on affordable housing.

The EIS should study the impacts of the proposals on tree canopy, green space, play spaces, and recreation.

The EIS should study the impacts of the proposals on parking for neighborhoods including residents and small businesses.

The EIS should study the impacts of the proposals on sewers, sewage treatment, and water-quality.

The EIS should study the impacts of the proposals on public services including fire and police.

The EIS should study the impacts of the proposals on utilities including water and electricity.

The EIS should study the impacts of the proposals on transportation including traffic congestion, and the adequacy and availability and cost of public transit.

The EIS should study the impacts of the proposals on schools including overcrowding and playfield space.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Penny Vik**

11/15/2017 21:04

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I am very concerned about traffic congestion in our neighborhood on Queen Anne as it is. We have a grade school a block away with many children walking to school and parents in cars speeding to get their children to school. With potentially more people moving into the neighborhood there will be more traffic with street parking at a premium now. My husband and I have lived on Queen Anne for almost 30 years and 11 years ago when we decided to sell our first QA home we could not think of another community that we would rather live in so we bought our second home on QA as well. I know that time and progress don't stand still but there has been so much develop-

ment and change in the quality of many neighborhoods in Seattle it would be heart breaking to see it in my own backyard. Adding more small living facilities to neighborhoods will not make them more affordable. Please help save our small communities. I don't want to move out of Seattle.

Thank you.

**Do you have other comments or suggestions related to the scope of the EIS?**

It occurred to me that a new neighborhood of affordable housing could be constructed along parts of Aurora and bring with it a change to the landscape and attitude of an areas that has long been neglected. There are many dilapidated buildings, shoddy parking lots, motels etc., you know what I mean. I would imagine some of these properties could be purchased at a reasonable price, and with a conscientious developer with vision, an area that once was seedy could be transformed into a respectable, livable neighborhood. Please give this serious consideration.

Respectfully,

Penny Vik

**Susan Lantz-Dey**

11/15/2017 21:44

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

We need to be thoughtful in how we increase density. In our haste, we are building way beyond the capacity of the existing infrastructure, especially transportation, making things miserable for everyone. Density is increasing at the expense of greenspace and airspace, sunshine, privacy, affordability. People are being displaced as their neighborhoods get sold to developers. We need to pause and evaluate the outcomes of housing that has been occupied for a few years before we inflict that pain on the entire city.

2. Parking: is already an issue in most neighborhoods. Do not make the problem worse by eliminating the off street parking requirement. What % of residency in existing ADUs/DADUs and new apodments/apartments/ townhouses/condos close to bus lines own cars and compete for street parking? How does that compare to the assumptions going in? How will that % increased street parking affect the neighborhoods being targeted, for both residents and businesses?

3. Owner occupancy: Maintain requirement for owner to live on premises for half the year. All dwellings need long term contracts (minimum 6 months). The purpose of ADUs/DADUs is to increase affordable housing, not to create AirB&Bs.

7. Lot Coverage: Increasing impervious surface area will negatively impact runoff, tree canopy, biomass, air quality. People need Nature without having to go to a park to find it.

•  
11/15/2017 21:45

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Seattle is known for its charming neighborhoods. Adding less restrictions for the ADUs is definitely a way to break down the security, trust and comfort of these family neighborhoods. There has been a lot of research done on this and every point of restriction in the current ADU regulation needs to stand. The lot size requirement, the

extra parking place and especially the requirement that owner occupation is absolutely essential to keep pride of ownership and not exploitative absent landlord behavior.

**Do you have other comments or suggestions related to the scope of the EIS?**

Right now there are not that many ADUs in most neighborhoods so the impact is not significant. However, if everyone added an ADU, the neighborhoods would change dramatically....increased garbage, noise, cars, etc. It seems like the perfect way to destroy a family neighborhood and I believe Seattle still has a lot of families. Is destroying existing neighborhoods the way to solve the housing problem? Don't these old neighborhoods have value? We still have a lot of areas that could be developed and improved. Is it that necessary to destroy what is good about our city. We seems to have a reputation for doing that over the years, from tearing down beautiful landmarks, now to possibly destroying beautiful old family neighborhoods. Shame on Seattle for even considering this. We have height limits in our city....how about building to those in the city and also creating a decent culture in the city for those who already live in condos and apartments down town. There are very few every day type of restaurants and grocery stores for people to go who live in the city, and even fewer parks to walk in for those who live downtown. Don't trash our beautiful old neighborhoods.....they are our history, they are what makes us special and unique and desirable!!!!

**Jay Lazerwitz**

11/15/2017 22:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Opening up the scope of duplex-triplex housing in some or all single-family neighborhoods

**Do you have other comments or suggestions related to the scope of the EIS?**

Can the changes be neighborhood-specific, in regard to parking, tree cover, affordable housing?

**Steve Zemke**

11/15/2017 22:51

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Expansion and more detail in land use component to include: Need to assess impact on open space, trees and urban forest canopy volume and neighborhood tree canopy goals in Urban Forest Sustainability Plan. .

Requirement to conduct a detailed canopy impact assessment on each project and use of permits to tally tree loss so city can track changes over time and assess impacts on reaching city tree canopy goals..

Mitigation measures to compensate for replacement of canopy loss by planting trees with equivalent canopy volume either on site or off site by paying into a tree replacement fund.

Use of a 2 week public notice of trees being removed as SDOT does.

Use of incentives like added height if exceptional trees are saved on site by design change

Impact on environmental services provided by trees being lost, eg stormwater mitigation, air pollution reduction, neighborhood property valuation, animal habitat, visual screening, noise reduction, wind and heat patterns to cite a few examples.

**Do you have other comments or suggestions related to the scope of the EIS?**

Quantify impacts by number of ADU's and DADU's in each neighborhood expected, giving both a time frame and number of units expected with at least a low and high estimate of units.

Quantify expected monthly rental prices in neighborhoods over time

**Steve Hurd & Caroline Shelton**

11/15/2017 22:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

We support Alternative 2. This alternative prioritizes housing for people at all income levels by diversifying the housing alternatives available. ADUs offer a source of rental income for new home buyers, support diverse extended families and households and provide more opportunities for seniors to downsize and stay in the same neighborhood.

The No Action Alternative 1 will acerbate the growing stranglehold that the upper middle class holds on our single family neighborhoods. We are part of that upper middle class and single family homeowners. Instead of trying to erect a fence around our single family neighborhood, we, instead, look forward to sharing our neighborhood with others who, like us, simply want to stay in this City they love.

Alternative 2 rightly removes off-street parking restrictions. In so doing, it prioritizes people over cars. We do not see any kind of parking crisis in our neighborhood. Street parking, when it actually becomes scarce, can be managed through permit pricing. Access to free street parking should not be used as reason to block critically needed housing, particularly in a City with an increasing number of citizens who are choosing to forego car ownership for other means of transportation.

By creating a more reasonable approach to the permitting of new ADUs in single family neighborhoods, Alternative 2 will likely encourage the daylighting of many current unpermitted and unregistered units, resulting in safer housing. Many of the unpermitted mother-in-law units have provided essential housing and saved our city from a much more severe housing crisis. The existence of these units reflects real housing need.

Liberalizing ADU requirements, we can bring more of these units into a place where they are inspected and taxed.

Alternative 2 represents a modest and environmentally sound step in promoting more housing alternatives in single family neighborhoods. Many of these neighborhoods have lost population over the last several decades, due, in part, to exclusionary zoning. We would encourage the City to go further in the future and move from exclusionary zoning to truly inclusionary zoning, zoning that prioritizes more ADUs, duplexes and triplexes and discourages teardowns when a teardown would result in a larger single family home on the lot.

Steve Hurd

Caroline Shelton

4070 1st Ave. NE

## Mark D Cooper

11/16/2017 0:36

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

This proposed legislation is but the latest staggeringly stupid ideas coming from city hall that are supposedly addressing Seattle's housing crunch. In fact, it is an end-run around single-family zoning laws that would further encourage irresponsible development by speculators, and further erode Seattle's declining quality of life.

I am a single family homeowner in Seattle. When I moved to Seattle 20 years ago, I was charmed by the single family zoning, green spaces and small neighborhoods within an urban setting. Now that is systematically being destroyed.

Who benefits from this idiocy? Pushed by "urban density" zealots, it actually benefits speculators, developers and city politicians who get to simultaneously decrease the square footage people live in and thereby increase the tax base.

And actually it would benefit me! I could become a mini-slum lord by building three units on my property and skip town. Bye-bye Seattle as we knew it!

Obviously I don't want that. But the city council seems willing to roll over to developers.

The proposed legislation ( option 2) has a huge negative impact on the environment, as it has no consideration for transportation, parking, increased stress on sewer systems and related infrastructure. Stupid, stupid idea.

### **Do you have other comments or suggestions related to the scope of the EIS?**

This proposed legislation is but the latest staggeringly stupid ideas coming from city hall that are supposedly addressing Seattle's housing crunch. In fact, it is an end-run around single-family zoning laws that would further encourage irresponsible development by speculators, and further erode Seattle's declining quality of life.

I am a single family homeowner in Seattle. When I moved to Seattle 20 years ago, I was charmed by the single family zoning, green spaces and small neighborhoods within an urban setting. Now that is systematically being destroyed.

Who benefits from this idiocy? Pushed by "urban density" zealots, it actually benefits speculators, developers and city politicians who get to simultaneously decrease the square footage people live in and thereby increase the tax base.

And actually it would benefit me! I could become a mini-slum lord by building three units on my property and skip town. Bye-bye Seattle as we knew it!

Obviously I don't want that. But the city council seems willing to roll over to developers.

The proposed legislation ( option 2) has a huge negative impact on the environment, as it has no consideration for transportation, parking, increased stress on sewer systems and related infrastructure. Stupid, stupid idea.

## Dennis Haack

11/16/2017 3:15

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

We should be presented with more alternatives to the proposed changes. The objectives of this proposal should

be clearer. The loss of vegetation / canopy to site these additional buildings needs to be addressed more completely. The parking situation is not addressed -- cars are a reality, and these areas are already parked up and additional needs for parking are not addressed in this proposal. Additional sweage/trash concerns are not adequately accounted for, and the accessibility for fire and rescue services is not made--adequate access to the back yards and other areas where these units will be sited will be tight. Ongoing inspection of the units for code violations/ upgrades/ enlarging the units without permission are not accounted for, as this will happen.

**Do you have other comments or suggestions related to the scope of the EIS?**

Needs to address ongoing monitoring for compliance to the ordinance , parking, and trash/sewage., Aesthetics and neighborhood safety need to be better addressed.

**Andrew Engelson**

11/16/2017 7:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

no

**Do you have other comments or suggestions related to the scope of the EIS?**

I'm a home owner in Madison Valley, and have lived here since 2002. The home is a small 1920s cottage that my wife and I could afford on two salaries working for non-profits. We would no longer be able to live in this neighborhood had we not been lucky to buy 15 years ago. Please implement these measures to streamline the process of creating and permitting ADUs. We need more housing in the city to address affordability. My family has considered building a backyard cottage, but off-street parking is not possible on our site. We don't own a car and use transit and car sharing -- that's the model this city should be moving toward.

**Susan Roth**

11/16/2017 8:34

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

There are so many concerns with this crowding in of more people everywhere! My main concerns include shading, loss of views, loss of privacy, change of neighborhood character, impacts to wildlife, loss of tree canopy and infiltration capacity, lack of parking, more conflict, decreased property values due to devaluation of single-family homes into urban crowding.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Rob Fellows**

11/16/2017 8:36

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please see below

**Do you have other comments or suggestions related to the scope of the EIS?**

The Greenwood Community Council voted well over a year ago to support proposed changes to accessory dwelling regulations, but only is the requirement for owner-occupancy remained. My concern is that the independent impacts of removing the owner occupancy requirement will get lost if this issue is not considered independently

of the other proposed changes. I ask that a separate alternative be considered that includes all elements of the proposed changes, but without removing the requirement that a home-owner remains on the site.

In assessing this, the following impacts of removing the home-owner requirement should be disclosed:

- the effect on the rate of turnover and redevelopment
- the likelihood that new replacement buildings will be affordable
- the likelihood that existing affordable homes will be lost
- the likelihood the replacement buildings will continue to be sized and configured to support families
- the effect on the rate of home ownership, and on sales of properties to absentee financial investors as a commodity
- the effect on existing rental rates if property values increase due to this developer incentive

## Connie Buhl

11/16/2017 8:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. ADDITIONAL ALTERNATIVE: There should be a minimum of 3 alternatives.
2. NEIGHBORHOOD CHARACTER PRESERVATION: The EIS should discuss the competing City priorities of preserving historic neighborhood character, which includes maintaining - and not increasing - density.
3. NARROW SMALL LOTS VS. WIDE LARGE LOTS: The EIS should recognize that density differs all over the City and thus the proposed density increases should not be uniformly applied all over a city which is certainly not uniform to begin with. For example, older, high density neighborhoods with narrow lots, driveways consuming public parking, and parking on only 1 side of the street are already challenged to provide public street parking. This is in contrast to other neighborhoods with much larger lots, wider streets, parking on both sides of the street, alley parking, etc all of which contribute to mitigating the impacts such as proposed increased DADU/ADU units.
4. 1 OR 2 SMALL CHANGES MIGHT GIVE THE LARGE DESIRED RESULT: The City should consider only small incremental changes and quantify the impact. For example, if the City removed just the DADU/ADU owner-occupancy requirement, I believe that change alone would result in a significant increase in the number of ADU/DADU units and wouldn't do the damage packaged in the current proposal. In fact, I predict it would be huge. Couple that simple change with allowing parking spaces in the front 20ft of a property (but without new curb-cuts which would decrease public street properties) and, again, the results would likely be significant.

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. As a small real estate investor who has to decide how to invest my capital - any premise that this law will somehow create "affordable" housing is incorrect. Investors, savers - whomever - invest their money when they see the value proposition increasing. In the case of landlords - it is when we see rents increasing. I am not going to invest in building DADU/ADUs to create affordable housing with an expectation of having lower than market rate rent. I am going to do it to get market rent in an increasing market. (The City SHOULD NOT want market rents to decrease because the net effect is just like when the stock market goes down - recession or worse - foreclosures, bond failures, etc.) If the City wants a certain number of housing units in a certain price point, it is up to the City to provide that housing. Do not rely on the free market to provide a non-free-market solution to housing. It doesn't

work that way. To control its destiny and the supply of "affordable" housing, the City needs to be the owner/developer. No other solution will work. The only thing these proposed changes to development standards will do is enrich property owners. It will absolutely not increase the supply of affordable housing.

## **matt chadsey**

11/16/2017 9:02

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please review the lost ecosystem services from land converted from yards to buildings. The city is losing trees and permeable ground at a substantial rate - this loss results in lost habitat, increased flooding, and human health impacts among many other economic benefits. (Earth Economics in Tacoma does this type of analysis.) For example, in Wallingford there are already frequent CSOs into Lake Union of UNTREATED sewage. The ADUs and other measures will simply make that worse. These are real costs that should be included.

The impact of increased density on services - access to park space, mass transit, ability to park, etc.

The addition of these units will also drastically change the nature of the community. Removing the onsite owner requirement will encourage remote investors and managers that do not care for or contribute to the community in any way. This type of blind investment is what leads to dysfunctional neighborhoods and real estate bubbles that are already occurring in this region.

Decreased 'beauty' and historic nature of the community will also directly reduce property value and taxes of existing homes. Again, this is a direct economic cost to the city and residents.

The idea that ADUs will actually increase affordable housing is misguided - the value of living near downtown will always be high and these additions will just create more high-priced housing. This phenomenon should be carefully reviewed.

Finally, there is plenty of under utilized property along the major arterials - 15th, aurora, etc. These have low/no density and could easily be utilized to increase affordable housing options - an important goal.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The real impacts from other regions considering this type of change should be evaluated so that the data and assumptions can be tested in reality.

## **Steven Frankel**

11/16/2017 9:30

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow for both ADU and DADU on same property. Allow non-owner occupants to establish ADUs

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am a homeowner in the seattle area and am in favor of removing barriers to establish ADUs and DADUs. The cost of living continues to rise in this city and establishing low impact housing such as ADUs will help me continue to live here and help others be able to live in an affordable unit. Most people with ADUs or DADUs want tenants that stay long term and do not like dealing with turnover/re-listing a rental. For this reason it helps to keep the rents of these units affordable.

## Mike Dady

11/16/2017 9:39

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Regarding residency requirements, under the proposed changes I am concerned that investor/developer owned tri-plex style projects will encroach and eventually take over owner occupied or renter occupied housing in SFR zoned neighborhoods resulting in the degradation of long running intergenerational, social and community fabric. It is clear from our current hyper development phase that is this community that comes last, if even considered at all. The one-size-fits-all approach of removing parking requirements in SFR zones is ignoring the challenges of parking in areas of the city that are not well served by transit and are already tapped-out for parking. Some of these existing parking challenges are due to inadequate public investment in street improvements such as curbs, drainage, sidewalks and other modern amenities which when lacking do not utilize the public right-of-way in an efficient manner and or allow private property owners to "claim" as their own land that is in the ROW. The addition of up to possibly twelve inhabitants on what was once a single household parcel will add tremendous pressure on utilities such as sewer capture and treatment, as well as the fore mentioned parking pressures.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The proposed increase in the square foot allowance for DADU's and AADU's seems appropriate given the costs affiliated with their construction and the need for units that can accommodate a couple, or household of more than one.

## david lion

11/16/2017 10:32

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Comprehensive planning for city-wide infrastructure (utilities, traffic, emergency-services, schools, libraries) to address current density problems, and increased demands of increased density. Coordination with Metro's future plans. Coordination with Seattle Schools planning processes.

### **Do you have other comments or suggestions related to the scope of the EIS?**

I am against the following specific elements of Alternative 2 when applied to the entire City:

1) Number of Accessory Dwelling Units allowed on a single-family zoned lot.

Many neighborhoods are already densely packed, and do not have the headroom in infrastructure for such an increase in density. These infrastructure components include utility capacity, clear streets for increased traffic flow, on-street-parking, emergency service capacity, and access to mass transit / alignment with the long-term mass transit plans for growth.

2) Parking.

In dense neighborhoods, on-street parking is already in short-supply. Neighborhoods are waiting \*years\* to add Residential Parking Zones to defend residents ability to park near their houses. Any increase in urban density must recognize that people still use cars, and that cars need storage off-street.

In addition to the specific issues noted above, the more general issues of Road Capacity and Traffic Planning, Utility Infrastructure, Emergency Services Planning, and Public Transportation must be addressed and developed explicitly in conjunction with any city-wide changes to density.

Aspects of our city are already over capacity. Take for example our current arterial streets and freeways, almost parking lots at rush hours. We will simply make matters worse by allowing an increase in population by allowing increased housing and occupancy density unless we plan for and enact solutions that allow people to commute with ease, increase utility capacities, provide schools, libraries, and civic services for the increased population.

Thank you for your time and for developing a comprehensive plan that will address the issues that will arise from an increased population due to increased densification.

david lion

## **Darrell Howe**

11/16/2017 10:58

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should stress the need for the following:

1. Need to assess impact on open space, trees and urban forest canopy volume and neighborhood tree canopy goals in Urban Forest Sustainability Plan.
2. Requirement to conduct a detailed canopy impact assessment on each project and use of permits to tally tree loss so city can track changes over time and assess impacts on reaching city tree canopy goals.
3. Use of Mitigation measures to compensate for replacement of canopy loss by planting trees with equivalent canopy volume either on site or off site by paying into a tree replacement fund.
4. Use of a 2 week public notice of trees being removed as SDOT does so neighbors know what is happening.
5. Use of incentives like added height if exceptional trees are saved on site by design change
6. Impact on environmental services provided by trees being lost, eg stormwater mitigation, air pollution reduction, neighborhood property valuation, animal habitat, visual screening, noise reduction, wind and heat patterns to cite a few examples.

### **Do you have other comments or suggestions related to the scope of the EIS?**

The EIS should take into consideration the requirements set forth in the 2001 City of Seattle Tree Policy #060-P 5.6.1 which includes the need for Vegetation Management Plans for projects where clearing limits exceed "any combination of trees or other vegetation covering an area of 1000 square feet or more". This requirement is strengthened for ECA's to 750sf of vegetation cleared and not just tree removal. Please take a hard look at exemptions to this rule during the scoping process.

## **Vince Houmes**

11/16/2017 11:17

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Prioritize offering more housing choices, please

**Do you have other comments or suggestions related to the scope of the EIS?**

Please consider benefits of increasing density on climate change. The future is YIMBY.

**Charles Bigger**

11/16/2017 11:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The scope of topics listed seems suitable to me.

**Do you have other comments or suggestions related to the scope of the EIS?**

Are there other urban density his studies from around the country available to the panel? Surely similar studies will have been done for other urban density proposals. While every city will have it's own specific problems associated with increased density, there will be comparable issues common to all projects of this type.

In our city of Seattle, lot coverage, tree canopy, and absentee ownership are three very major items that must be fully studied and considered.

**George R**

11/16/2017 11:42

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

Proposal now makes it viable/feasible for me to implement DADU that was not feasible a year ago. I support and see value in these specific changes: 1) not requiring a separate off street parking spot specifically for DADU. 2) larger square footage not including the Garage square footage. Please approve those aspects of the proposals; today the inform Go/No Go

**Cathryn Palmer**

11/16/2017 11:56

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please address the objectives of increased affordable and family housing, consistent with existing single-family residences.

**Do you have other comments or suggestions related to the scope of the EIS?**

I am troubled by proposals to remove existing requirements for occupancy by the property owner.

**Eric Aderhold**

11/16/2017 12:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given that demand for housing that is not built as ADUs will often be satisfied by building housing elsewhere, I would like to see an analysis of where the additional housing constructed under Alternative 2 would otherwise be constructed under the "No Action" Alternative 1, whether that housing is built inside or outside the City of Seattle.

I would like to see that analysis include comparisons of impacts on the state's air quality, water quality, forests, and farmland under the two alternatives.

I would also like to see the study include a third alternative which goes slightly farther in the changes to single-family zoning:

\* Remove the 1,000 square foot limit on ADUs, allowing for a large house to be subdivided into two equal-sized units if the owner desires.

\* Create true "triplex zoning," allowing two ADUs in the same building rather than requiring that one be in a detached structure.

\* Allow first-floor commercial spaces on corner lots, with no required setback from the sidewalk to the commercial space.

\* Allow for lots with DADUs to be split to enable separate ownership of the DADU.

While these changes may not be under consideration by the city council at this time, an existing study of their impacts would be useful should they be considered in the future.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Andres Salomon**

11/16/2017 12:15

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please consider getting rid of the household size requirement for lots with (D)ADUs. In general, that requirement should be removed - it's classist and limits creative (and healthy) living arrangements like co-ops and co-housing. However, we can start by removing it for properties with (D)ADUs.

**Do you have other comments or suggestions related to the scope of the EIS?**

I wanted to build a DADU for my parents, but the owner-occupancy requirement and the parking space requirement (my family lives car-free, and it's silly that we'd need an additional parking space for the DADU) kept me from doing it. I strongly support Alternative 2, and look forward to the results of the EIS study.

**Eric Bronson**

11/16/2017 12:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

1. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
2. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

3. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
4. Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
5. Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
6. Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
7. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
8. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
9. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Gregory Hill

11/16/2017 12:28

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The EIS should offer a summary of the economic impacts to housing as a result of the changes.

1. What is the tax impacts projected for dwellings based on the new potential development opportunities?
2. What is the cost impact to home purchasing based in creating a non-owner rental market for three units per lot, versus one unit today (an ADU or a DADU)?

3. Past EIS documents have included graphic aids to help explain the impacts of revised development standards. A careful review of the previous literature by trained professionals shows potentially significant differences in lot coverage are possible, from current conditions, when greater lot coverage is allowed, combined with smaller lot sizes. The EIS should provide a clear set of graphics to explain this to laypersons.

4. Provide alternatives that have dramatically different outcomes by more dramatically limiting lot coverage, requiring owner occupancy, and by requiring more parking and greater dimensions of open space.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Julia H Tracy**

11/16/2017 12:37

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Loss of permeable surface. Loss of tree canopy.

**Do you have other comments or suggestions related to the scope of the EIS?**

Specific protections for mature trees.

**Sheryl Cababa**

11/16/2017 13:07

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The parking requirement needs to be removed for ADUs. We live in an area in which it would be impossible to add an off-street parking spot (the u-district), and which has great access to public transportation (light rail, busses). We should be able to increase density in our neighborhood without a parking requirement.

**Do you have other comments or suggestions related to the scope of the EIS?**

The parking requirement needs to be removed for ADUs. We live in an area in which it would be impossible to add an off-street parking spot (the u-district), and which has great access to public transportation (light rail, busses). We should be able to increase density in our neighborhood without a parking requirement.

**Adam Kennedy**

11/16/2017 13:19

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental road-block about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Christy Avery

11/16/2017 13:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

The impacts to groundwater levels (causing basement flooding in neighbors houses) from the additional paving; the impacts to our tree canopy; impacts to our stormwater treatment facility. The potential these will either be luxury homes or used as Airbnbs, neither of which help our affordability crisis.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jonathan Karakowski**

11/16/2017 14:25

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I think the list of topics for the EIS is fairly comprehensive although here is one additional item to consider: are crime rates and/or nuisance complaints (uncut grass, garbage, etc) correlated with large numbers of non-owner occupied properties? "Police" and "aesthetics" are on the list but it's not clear whether this includes potential changes in crime rates and other complaints.

**Do you have other comments or suggestions related to the scope of the EIS?**

I've read through quite a few of the comments and it seems clear that this single approach is not a good fit for the entire city of Seattle. As just one example, accessibility to transit (including future light rail) varies widely throughout the city. My suggestion is to study individual neighborhoods thoughtfully and make changes piecemeal if and when it appears to make sense environmentally and economically.

**Sylvia Schweinberger**

11/16/2017 15:09

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes, I would like to see the issue of increased sewer line requirements addressed. I would like to see parking required. I would like to see the rules for backyard cottages ( backyard adu's) remain as they are now with no changes. I would like to see the issue of increased power/electrical requirements raised. I would like to see builders be required to pay fees for these infrastructure improvements - i.e. increased electrical and sewer capacity. Also increased road capacity improvements.

**Do you have other comments or suggestions related to the scope of the EIS?**

**bruce parker**

11/16/2017 15:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

consider public financing options for DADUs and ADUs.

ADUs and DADUs increase the value of the property that they are on. While this creates an additional rental unit, the increased cost makes the property less affordable for a family trying to buy a home. If these units were able to be sold separately that would actually increase the number of homes for sale. I suggest that this might be achieved with minimal negative impact, by adding FAR in addition to lot coverage requirements in a way that allows smaller equally sized units on a lot. Emphasis on smaller built area than allowed under the current land use code.

**Do you have other comments or suggestions related to the scope of the EIS?**

1. Number of ADU's on a lot: Alternative 1 no action keep one per lot. DADU's built under current land-use regulations have an impact to the built environment but one generally in keeping with current development patterns in SFR zones. Allowing three units especially in combination with the removal of the owner occupancy requirement will lead to SFRs designed and built to be rentals with a much higher combined value. Because the combined

rentals will have a higher value than one smaller SFR there will be financial incentive to increase the demolition of naturally occurring affordable SFR housing. In addition, the higher combined value of three units will make their purchase that much less obtainable for a family and more appealing for an out of area investor. It has been well documented in the HALA literature that opportunity gaps exist based on proximity and home ownership. Ownership is one of the primary means of accumulating and maintaining household wealth. This is true for marginalized communities but also for middle class families. Allowing more than one ADU per lot, and eliminating the owner occupancy requirement, will reduce the amount of affordable housing available to families to own.

Additional alternatives: Portland and Vancouver give special consideration to alley lots and corner lots. Vancouver only allows DADU's on lots with alleys. These lots can more readily handle increased development with less impact to the urban fabric. The code should be amended to allow these lots to be segregated to create more small scale SFRs that can be sold independently.

2. Parking: Alternative 2 Remove parking requirement for ADU's. Not a politically palatable but removing the parking requirement will likely not have an environmental impact and will free up yard space for vegetation.

3. Owner Occupancy: Alternative 1- the current proposal to sunset owner occupancy after a period of time is good and should minimize the destruction of naturally occurring affordable housing by speculative developers. The period of time should be 3 years. However, owner occupancy should be required for all properties used short term rentals.

4. Reduce minimum lot size: Alternative 2 - we already design many cottages on lots less than 4,000 sq. ft in size and the size of the cottage on smaller lots is driven by lot coverage as it should be.

Additional alternatives: Portland and Vancouver give special consideration to alley lots and corner lots. These lots can more readily handle increased development without disrupting the neighborhood fabric.

5. Increasing the allowable cottage size from 800 to 1,000 sq ft.: Alternative 1 - increasing the allowable size 200 sq. ft. is a great idea and makes it easier to fit in two bedrooms. However, Alternative 2 excludes the garage and other storage from this calculation potentially allowing 2,000 sq. ft. ADUs. We frequently design cottages where the garage space is not intended for parking but as part of the cottage. The city can't and shouldn't mandate that garages are used for parking but not including this space in the allowable square footage will unnecessarily increase the allowable size and bulk of DADUs. And will have a negative impact on the character of neighborhoods, the amount of natural light and vegetation available. For the large increase in allowable square footage of Alternative 2 to be considered a corresponding reduction in allowable floor area ratio (FAR) should adopted capping the combined size of the two units. This would allow two smaller more equal sized units to be built.

Additional comment: In general the city needs to be more consistent on determining what is included in the allowable gross square footage. Seattle land use code includes all storage areas to the extent that some reviewers for SDCI want to include covered unenclosed exterior space. The current land use code could be tweaked and specificity added to allow more usable storage area.

Additional Alternative: Consider going to a combination of floor area ratio (FAR) and lot coverage restriction to encourage the creation of two more equally sized family friendly units.

6. Additional Height: Alternative 1 - while almost all of the cottages we design are built to the allowable height limit the current height limit is adequate for a two story structure. Additional height can reduce the amount of sunlight reaching neighbors yards. The multi-family code has provisions that allow additional height with a consideration for the impact of shading on neighboring properties. Something similar can and should be adopted for DADUs.

7. Lot coverage Limit: Maintain. Yards do have a value both for families raising children and as green spaces and as a way to reduce stormwater runoff.

In the world in which we live, small children have almost no opportunity for unsupervised outdoor play. Urban parks that require that children be constantly monitored by a caregiver cannot fill the void. Back yards provide a safe place for children to play, create, and be outside. The alternative is often additional screen time with the corresponding negative health effects.

Increasing lot coverage will decrease green space and tree canopy available for habitat for wildlife. Interconnected vegetated corridors can provide valuable habitat for pollinators and other wildlife even within an urban environment.

Increasing lot coverage will increase stormwater runoff. As we witnessed, when the west point waste treatment plant went down, we are at capacity for dealing with urban stormwater runoff. The best alternative is to allow stormwater to enter the ground where it can be filtered and recharge streams and lakes. The rainwise program recognizes the value of groundwater infiltration but also importantly that it is less expensive to provide point source treatment than to create new treatment capacity. While it is true that the new stormwater code does require increased on site stormwater management, most backyard cottages are below the size threshold to trigger these requirements.

8. Rear yard coverage: Alternative 2 Recognizing that yards do have a value both for families raising children and as green spaces and as a way to reduce stormwater runoff.

9. Location of entry: Alternative 2. Allow entries 5 ft from nearest lot line with written consent of the neighbor.

Additional Alternative: Allow the use of side yard easements and or the ability of zero lot line development for DADUs. This will make it easier to build cottages and more efficient use of yard space.

10. Rooftop features: Alternative 2 -allowing rooftop features, namely shed dormers to extend above the base ("eave height") will not increase the bulk of DADUs allowed under the current land use code and therefore have no environmental impact.

11. Household Size: See comment for number 1.

12. Mandatory Affordable Housing (MHA): Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

13. Maintain. Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

**Craig A. Norsen**

11/16/2017 15:27

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I feel the EIS should address more than only the two alternatives of no action and the full proposed change. There is significant public concern that the full proposed change goes too far, while at the same time there is a willingness on the part of many to see if the current code can be amended in thoughtful ways to allow an increase in housing stock in places where it is possible to do so with less impact than the full proposed change would have

when applied across all neighborhoods. I feel the third alternative proposed in the comments prepared by the Queen Anne Community Council Land Use Review Committee would be a good third alternative.

**Do you have other comments or suggestions related to the scope of the EIS?**

I view this issue as very significant, and that it warrants the full EIS review process. The proposed changes would have significant impact, and must be carefully studied and reported.

**B. Glebe**

11/16/2017 16:07

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. There needs to be a third alternative that is more nuanced, thoughtful, and appreciative of the fact that our single-family neighborhoods are a treasure. 2. The owner-occupancy requirement should not be changed because that will spell the end of normal families being able to buy a single-family home. They will always be outbid by developers and speculators. Houses will be converted into multi-family rentals. 3. Also, 3200 sq ft lots are too small to have both a ADU and DADU. Nowhere else in the country do they allow anything like this. It is a major experiment based less on data than on ideology. 4. The effect all of this would have on infrastructure (school capacity; capacity of utilities; roads; parking; public transportation), ecosystem (loss of tree canopy, increased surface water runoff).

**Do you have other comments or suggestions related to the scope of the EIS?**

Please consider the perspectives of homeowners too and not just developers and homeless advocates. The reality is that giving away our neighborhoods to developers is not going to make housing more affordable. All around the city you can see small relatively affordable single-family homes torn down and replaced with million dollar homes or townhouses. Housing is getting less affordable with all of this building, not more affordable. Please look at actual facts and data. If you want to make housing more affordable, rent control would be one answer. Also, what is the actual vacancy rate in this city for apartments? So many apartments have been built...are they really full?

**Paul Zemtsov**

11/16/2017 16:17

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Alternative Two will clearly add much needed housing stock to Seattle. By providing housing close to the employment center of Seattle and by increasing the density of the existing land, a number of benefits accrue to the environment. These include lower carbon emissions due to shorter commutes or commutes by foot, bike or public transportation. Other benefits include shorter commute times, and a richer urban lifestyle.

The EIS should compare the carbon footprint of Alternative Two, with the carbon footprint associated with the housing and commute patterns of suburban growth. I am sure that the equivalent number of housing units within, let's say, a 20 mile radius of Seattle would result in significant increases in carbon emissions due to increased commute distances, increased use of combustion engine vehicles due to lack of convenient public transportation, and increased carbon generated by significant investments in infrastructure (such as asphalt pavement, concrete, waste line installation, etc.)

With climate change an ever increasing threat it is important for the EIS to analyze the carbon reducing advantages of increasing urban densities, such as the proposed AlternativeTwo.

**Do you have other comments or suggestions related to the scope of the EIS?**

I support Alternative Two. Many older cities, including San Francisco support significantly higher housing densities without any loss in quality of life.

**Bruce Becker**

11/16/2017 16:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Neighborhoods can be greatly affected by the traffic, parking, limited sunlight, noise, and other factors when building sizes and lot densities are increased. I also think that larger buildings should pay to upgrade the infrastructure - sewer, sewage processing, water, roads, etc. These were funded by the existing owners who should not be expected to fund improvements needed to meet the demands that were unexpected because more density is allowed.

Many locations in Seattle have streets that cannot support more traffic because they are too narrow and/or have too many cars parked along them already.

**Do you have other comments or suggestions related to the scope of the EIS?**

1. No Action is my strong preference. A primary purpose of zoning is to control and preserve the nature of neighborhoods. This preservation of neighborhoods and the feel of neighborhoods needs to be preserved. Considering rezoning all, or substantially all, residential neighborhoods is a big mistake. Any change should be carefully considered on a limited basis and only where appropriate to observe the changes that take place.

2. Changing the number of units on a lot, from 2 to 3, including an AADU and a DADU is a big mistake. It changes single family zones to apartment-like zones instantly, with impossible parking, noise, etc. Removing the requirement of an owner-occupant is likewise a way to cause neighborhoods to decline. Investors are more invested if they also live at the location.

3. Parking is critical for most neighborhoods. Parking should continue to be required for every unit. I don't believe that apartment dwellers forgo owning automobiles except in unusual situations. However, as an inferior alternative, any lot that has an AADU or DADU can be prohibited from EVER receiving a Residential Parking Zone Permit. This would mean that parking would still be available to the existing houses that have traditionally depended on parking in front of the house (provided a Parking Zone is created).

4. The existing sizes - 1000 square feet for AADU and 800 square ft for DADU (including storage/garage) is PLENTY. Bigger units become less affordable which to some degree defeats the purpose of allowing the small units.

5. Sunlight/skylight are vital, and any decrease in lot size or increase in lot coverage or building height should not be allowed. These changes affect visual appeal of the neighborhood and street. Considerations of how any building affects a neighbors light should also be considered. Some houses have solar panel or passive solar heat gain from windows that should not be compromised by new buildings.

**B. Glebe**

11/16/2017 16:24

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I do have a concern about the proposed timing of the EIS. It is highly unlikely (at best) that you could adequately, much less comprehensively, study the myriad issues and effects of the sweeping change to our single-family neighborhoods being proposed by Councilman O'Brien AND have a draft EIS prepared by Spring 2018. It is not possible.

**Audrey Livermore**

11/16/2017 16:35

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

We support Alternate 2 for the following EIS objectives:

1. Number of ADUs allowed on a single-family lot
4. Maximum lot size for a DADU
6. Maximum height
7. Lot coverage limit
8. Lot coverage limit
9. Location of entries
10. Roof features

**Do you have other comments or suggestions related to the scope of the EIS?**

**Emory Baldwin**

11/16/2017 16:52

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please do not get rid of the owner residency requirement.

**Do you have other comments or suggestions related to the scope of the EIS?**

Require off street parking for ADUs, but not necessarily for the primary home.

**Amy Cash**

11/16/2017 16:54

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Seattle is experiencing a serious housing shortage, with rapidly rising rents, and with many people paying 50% or more of their income in rent. Population growth will continue and we should consider any and all opportunities to house people.

**Do you have other comments or suggestions related to the scope of the EIS?**

## Emory Baldwin

11/16/2017 17:20

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Please limit the number of unrelated adults who can occupy a property to 8. That is already double the current average household size of 4. Increasing beyond that would be too much of a change to neighborhoods.

**Do you have other comments or suggestions related to the scope of the EIS?**

I really do not want the city to get rid of the owner residency requirement. I fear that could lead to having a lot of "party houses" with renters who don't care about the neighborhood and so the quality of life will go down for neighbors.

## Alexander Tran

11/16/2017 17:26

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

I just want to add to the chorus of support for any work that supports ADU development. Its not a singular answer to the housing crisis but it certainly helps.

## Michelle

11/16/2017 17:26

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Parking

**Do you have other comments or suggestions related to the scope of the EIS?**

Parking - In neighborhoods without sidewalks, it is important that off street parking be provided, otherwise people are forced to walk in the street, which is quite dangerous, especially when the person can't step out of the way because cars are parked along the street.

Trees - Residential areas provide 72% of tree coverage in Seattle. It is important to take this into account when considering how much of a lot will be built on. (<http://www.seattlemag.com/news-and-features/struggle-save-seattle%E2%80%99s-urban-trees-face-development>)

## Land Use Committee of MCC

11/16/2017 17:53

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

See the 87-person signed petition emailed on November 16, 2017 for an outline of Alternative #3.

**Do you have other comments or suggestions related to the scope of the EIS?**

Please come to the Magnolia Public Library at 6pm on Tuesday, November 28th to address the concerns of resi-

dents. Thank you. David Moehring, Chairperson, Land Use Committee of Magnolia Community Council

## David Sucher

11/16/2017 17:55

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

IS OWNER-OCCUPANCY RESTRICTION LEGAL?

??Your department should ask the Law Department to offer a legal Opinion, (which will be published so the public can read it) answering this question "Is the non-owner occupant requirement even valid under both federal and state constitutions?" I know that lawyers have different opinions but at least opinion from City lawyers offers one perspective. ??

For example, I found legal opinion by City Attorney (City of Missoula) that "... generally zoning restrictions or conditions that limit the use of land based on identity or status of owner or occupant of land are held invalid by courts." Owner-occupants are given superior special status under current DADU law— is that even legal now?

??(And conversely, Seattle has no "owner occupancy" requirement for single-family houses and roughly 1 out of 7 such houses are rentals — so obviously city has not been destroyed by rental IN single family neighborhoods.)

### **Do you have other comments or suggestions related to the scope of the EIS?**

## David Sucher

11/16/2017 18:04

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Consider other "tweaks" to initial proposal which might make a difference in acceptability.

For example, anti-DADU opponents fear that there will be a vast increase in new DADUs (while at the same time arguing that the DADU plan won't do anything!). OK.

Suppose (as ONE example) that for the first 5 years the maximum number of permits issued for DADUs would be 1000....all issued once a year and in some sort of random drawing so that there is an equal chance for anyone to apply. Then, the person who was entitled to be required to submit plans in with 120 days.

Such a phase-in would give us a sense of

1. the expected demand for building DADUs and also
2. what they actually look like in our neighborhoods.

I think such a gradualist & evolutionary approach should be considered in the EIS.

### **Do you have other comments or suggestions related to the scope of the EIS?**

## David Sucher

11/16/2017 18:23

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

This might be a duplicate comment -- I didn't see confirmation so it may be a duplicate.

-----

**RATE OF DEVELOPMENT**

THE central question which determines the environmental impacts of any change to current DADU ordinance is the rate of growth or absorption (or whatever you want to call it) i.e. "How many DADUs will be built under different zoning code provisions?" That is the key number for determining the environmental impact. How the economists plan to forecast that I have no idea but I think it is the core question and I hope you will explain the methodology BEFORE the consultant launches off. Whether there is a cut-and-dried methodology is not likely so much of it is best guess and conjecture. And so much depends on local economy — Amazon is a freakish event and not likely such similar rate of growth will continue — but who knows?(Btw, what's interesting is that many DADU opponents offer as one of its arguments is that "DADUS are so expensive so that few will build them." I think that's a funny argument for people who oppose DADUs because they will destroy Seattle!)

STEEP SLOPES? The analysis should separate out lots which are identified and restricted by environmental conditions especially including the "steep slopes" section of the ESA...that's a significant number of lots which are already excluded.?

**Do you have other comments or suggestions related to the scope of the EIS?**

STANDARD OF REVIEW? City should determine the standard by which impacts are to be measured i.e. Should impacts be determined on the basis of what actually exists? Or What is legally possible with existing zoning? The difference can be significant. The impact statement must measure "before and after"/"now and then" based on asking different assumptions. It may be that the impact statement has to show both. I don't know what is legally required but I think it's important that the general public understand the expectations.?

URBAN FOREST? What are the facts on the existing "Urban Forest" and what are the desired and expected impacts from DADU 2.0.??

FRAME SCOPE IN QUESTIONS ? I don't know if your contract with the consultant team is amenable to such a framing but I would like to see provisions in the scope of work asked as questions....such as "Will DADU 2.0 (version XYZ) overload the utility systems?" I think that asking questions clarifies the intent to all.

**Deeann Glamser**

11/16/2017 19:04

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

This takes sf neighborhoods with small lots and already full curb parking and pushes them beyond critical mass. Sewers and water mains are outdated. What about livability, such as the city's pledge to save trees, once a priority? Moreover, no provision to keep rents affordable -- and control property taxes for long-time residents. All seems like a dream written for developers, land speculators, and Airbnb.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jeffrey Linn**

11/16/2017 19:08

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

In light of the affordability crisis that is plaguing the younger generations, I would like to see the potential for multi-generational housing of ADUs/DADUs discussed.

I would also like to see how the legalization of ADUs across the city could help to stabilize the finances of struggling middle-class homeowners by allowing them to use their properties to generate additional income.

Seattle is facing a historic housing shortage, resulting in escalating rents and no opportunity for home ownership among the middle class. One significant factor exacerbating this shortage is the fact that 57% of Seattle's residential land can only be used for detached, single family homes. ADUs and DADUs represent an enormous opportunity to increase the quantity and diversity of housing across the city.

**Do you have other comments or suggestions related to the scope of the EIS?**

The city should compare how it treats car storage to how it treats the addition of ADU/DADU housing. As I understand it, detached garages can be built to the lot line in many circumstances. This won't be allowed for DADUs in any circumstance. We should be treating housing for people more liberally than we treat storage for cars. Sadly, even with these proposals, it's still cars before people.

The City should follow the "Beyond Backyard Cottages" [1] recommendations to ease the construction of affordable units. This includes joint construction of backyard cottages on adjacent properties.

The City should study a third option: change ALL Single Family Zoning to Residential Small Lot to determine the impacts of allowing small scale affordable development throughout the city.

Residential Small Lot development reflects the historic built environment which includes many houses on lots smaller than 5000 square feet, the minimum size required in current single family zones.

[1] <https://medium.com/@matthutchinsaia/beyond-backyard-cottages-10-ideas-to-address-seattles-housing-shortage-94eac2c22901>

**John Barber**

11/16/2017 21:21

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Yes. See below.

**Do you have other comments or suggestions related to the scope of the EIS?**

The EIS should address the following:

Need to assess impact on open space, trees and urban forest canopy volume and neighborhood tree canopy goals in Urban Forest Sustainability Plan.

Requirement to conduct a detailed canopy impact assessment on each project and use of permits to tally tree loss so city can track changes over time and assess impacts on reaching city tree canopy goals.

Use of Mitigation measures to compensate for replacement of canopy loss by planting trees with equivalent canopy volume either on site or off site by paying into a tree replacement fund.

Use of a 2 week public notice of trees being removed as SDOT does so neighbors know what is happening.

Use of incentives like added height if exceptional trees are saved on site by design change

Impact on environmental services provided by trees being lost, eg stormwater mitigation, air pollution reduction, neighborhood property valuation, animal habitat, visual screening, noise reduction, wind and heat patterns to cite a few examples.

## Ben Wildman

11/16/2017 21:29

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Why is this EIS applied so broadly to such a large, diverse area with little if any regard to the amount of infill occurring and the specific type of existing housing?

### **Do you have other comments or suggestions related to the scope of the EIS?**

1. The impact on open space, trees and urban forest canopy volume and neighborhood tree canopy goals in Urban Forest Sustainability Plan need to be addressed.
2. A detailed canopy impact assessment should be conducted on each project to tally tree loss so city can track changes over time and assess impacts on reaching city tree canopy goals.
3. Mitigation measures should be implemented to provide for replacement of any canopy loss by planting trees with equivalent canopy volume either on site.
4. A 2 week public notice of trees proposed for removal should be implemented so neighbors can be informed of planned removals and have the opportunity to have the removal stopped.
5. Exceptional trees should be saved. No bonus or incentive should be provided. The definition of exceptional trees should be defined by a group of professionals knowledgeable about urban trees, including university professors, arborists, and others.
6. The impact on the environment provided by trees being lost, eg stormwater mitigation, air pollution reduction, neighborhood property valuation, animal habitat, visual screening, noise reduction, wind and heat patterns to cite a few examples.

## Makiko Tong

11/16/2017 21:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Pollution - impacted by increased number of cars brought by each individual especially during rush hours.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Mandating a proof of parking to purchase a car inside the City as mega-city like Tokyo is doing to restrict car ownership.

## Kevin Orme

11/16/2017 21:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) This EIS *\*must\** assess impact on open space, trees and city forest canopy volume and neighborhood tree canopy goals as already outlined in the Seattle Urban Forest Sustainability Plan.

2) The requirement of conducting a detailed canopy impact assessment on each project is critical - use of permits needs to be a central requirement, to correctly account for any/all tree loss so the City can track changes over time and assess impacts on reaching city tree canopy goals. Preferably there will be NO tree loss.

3) There needs to be *\*required\** mitigation rules to *\*adequately and accurately\** compensate for replacement of canopy loss by planting trees with equivalent canopy volume either on site or off site, at minimum by paying an *\*accurate\** amount into a tree replacement fund by any/all developers involved - *\*not\** deferred to a future property buyer or nebulous requirements that are usually the case today.

4) Use of a 2 week public notice of trees being removed - this is already done by SDOT, follow their example - so neighbors know what is happening and have adequate time to respond and provide input.

5) Use of incentives may be possible - to be discussed in an open and frank manner, *\*not\** decided behind the scenes administratively - if exceptional or heritage trees are saved on site by design changes to protect and accommodate them.

**Do you have other comments or suggestions related to the scope of the EIS?**

Thanks for the opportunity to respond and I look forward to hearing next steps.

**Lois E James**

11/16/2017 22:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

**Do you have other comments or suggestions related to the scope of the EIS?**

**Aidan Carroll**

11/16/2017 22:41

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Low-income housing, which is different from what the city refers to as "affordable housing." The latter has higher price/rent and is out of reach for many working families.

**Do you have other comments or suggestions related to the scope of the EIS?**

Thank you for proposing to reduce requirements on developers to build unnecessary parking. This wastes land and subsidizes driving and driving alone, an act which we must do everything in our power to reduce as fast as humanly possible.

Thank you also for proposing to expand legalization of Accessory Dwelling Units (ADUs), both detached and attached ("Mother-in-law apartments"), including in my neighborhood of North Wallingford. If permitted, we would strongly consider building one. This is an opportunity to create low-income and affordable housing as well as density, and a chance we cannot afford to miss.

It should preserve the tree canopy as much as possible and act to prevent corporations like AirBnB from taking advantage of our zoning changes to make a quick buck. But there is no reason to specifically act in the interest of "single-family homes." This is a lifestyle for the suburbs, not the city of the future. Everything we enjoy and more

as citizens in current oversized houses, we can have in apartments, tiny houses, or other innovative new housing options.

Don't let real-estate speculation hijack all your and our hard work on crafting this community plan, or fail to scale up our infrastructure with our growth, but do the right thing and act for density and livability, prioritizing the real needs of the community over the superficial ones of individuals more concerned with their views remaining vast, their cars remaining convenient, or their neighborhood schools remaining small when they still have room to grow.

## Edward Smalley

11/16/2017 22:42

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Allow exceptions found in section 23.44.041.B.3 for conversion of structures built between 1999 and 2010.

### **Do you have other comments or suggestions related to the scope of the EIS?**

Clarification is needed for Section 23.44.041.B.3. It appears the intent of this section is to do two things: 1) permit conversions of existing structures that comply with building codes, "if work requiring a permit is performed on the structure or has previously been performed without a permit", by allowing exception to "one or more of the development standards for accessory dwelling units, regardless of when the structures were constructed; and 2) allow conversions of structures built prior to 1999, even if they do not comply with current codes, BUT, "provided that any expansion or relocation of the accessory structure complies with the development standards for detached accessory dwelling units."

Two clarification recommendations: A: Please separate these two purposes into separate paragraphs to avoid misinterpretations; B: for existing structures built after 1999, modify language to reflect "if work requiring a permit is performed on the structure or has previously been performed with or without a permit".

## Richard Ellison

11/16/2017 23:31

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

1) No new ADU's should be allowed which remove Exceptional Trees.

2) Trees, especially Exceptional Trees, are greatly threatened by new ADU's, and the incentives provided by the City do not protect trees as originally hoped. Variances allowed in construction designed to save trees are rarely, if ever used by the developer.

3) The new Directive from the Mayor to enforce the existing Interim Tree Protection ordinance will still not change the law which allows maximum lot usage to maximize buildable areas on site. "Exceptional trees may be removed only if protecting the tree during construction would prevent the maximum allowed lot coverage from being achieved", is a loophole allowing an injury to the community and the environment. This is not effectively saving trees.

4) Rather than an Option to save Exceptional trees, when design alternatives exist that would result in a similar buildable area while saving the tree, it should be MANDATORY to preserve the tree. Use of incentives like added height if exceptional trees are saved on site by design change.

5) There is a need to assess impact on open space, trees and urban forest canopy volume and neighborhood tree

canopy goals as in Urban Forest Sustainability Plan.

6) There needs to be a requirement to conduct a detailed canopy impact assessment on each project and to measure 1) short term losses, 2) projected long term losses, and 3) cumulative impact on the neighborhood and Seattle area tree canopy.

7) The use of tree removal permits to tally tree loss should be required, and the City should be required to track changes in tree numbers and canopies over time and to help assess impacts on reaching city tree canopy goals.

8) Loss of large canopied trees reduces the habitat for many native bird species. Dr Steve Penland wrote a PhD thesis at the University of Washington detailing how reduction in the numbers of larger canopied trees results in a lower native bird species diversity and lower numbers of native bird individuals. There needs to be an estimation/evaluation of the cumulative impact of the potential losses of native birds with partial or full buildout of ADU's in neighborhoods and the city as a whole, not just piecemeal, project by project.

9) Use of Mitigation measures to compensate for replacement of canopy loss can in part be accomplished by planting trees with equivalent canopy volume either on site or off site by paying into a tree replacement and maintenance fund.

10) The lost soil areas which might allow replacement trees to grow will be limited with new ADU's. Allowing them to be built slimmer but taller units might allow for more soil area for trees to grow healthy to maturity. Soil improvement abatement (with organic nutrients to foster soil biodiversity) should be as part of mitigation.

11) Control of invasive non-native vegetation on site (English ivy, clamatis, holly, Japanese knotweed) should be a requirement of ADU development activities.

12) Use of a 4 week public notice period for trees being removed. Two weeks is not enough time to respond and prevent improper or illegal Exceptional tree loss.

13) Impact on environmental services provided by trees being lost, i.e. stormwater mitigation, air pollution reduction, neighborhood property valuation, animal habitat, visual screening, noise reduction, wind and heat patterns should be evaluated. This needs to be evaluated both for on-site and cumulative neighborhood impacts. For example, loss of large canopied trees in a neighborhood might affect normal flyway or migration pathways.

14) The trees and shrubs in the city form a sort of matrix of green for habitat. As the matrix thins, habitats become more like islands and the connectivity of green areas is reduced, resulting in a reduced in capacity for wildlife. Dr Jerry Franklin of the University of Washington is an expert on matrix-habitat issues.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Jeffrey Tucker**

11/16/2017 23:40

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

I would like the EIS to account for the large savings of vehicle miles traveled, carbon emissions, and paved land thanks to ADUs by comparing them to the next most likely locations for new residents in the Seattle area, which are mostly far away. Reducing net migration into the city proper does not mean those people simply don't exist -- most will move to the region one way or another, and if forced to the exurbs, they'll have to live a more environmentally impactful lifestyle. I'd also like the EIS to address the benefit that having more people brings to a neighborhood by increasing the potential market for all kinds of local businesses, which in turn benefits current

residents.

**Do you have other comments or suggestions related to the scope of the EIS?**

I'd like the EIS to recognize that blocking ADUs imposes large costs on their would-be residents. As Seattle homeowners on a flag-shaped split lot, my family would not be able to afford a house on a full lot in our current neighborhood, where we love living. More ADUs would provide similar lower-cost, flexible options to get more happy homes onto the limited land inside our borders. A full EIS needs to give equal weight to the benefits accruing to new residents as it gives to concerns of current residents.

**Marian Gillis**

11/17/2017 8:28

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Developers DO NOT need incentives. To work in lovely Seattle they must create affordable housing on every site.

**Do you have other comments or suggestions related to the scope of the EIS?**

**Karen vaage**

11/17/2017 8:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Analysis on the removal of tree canopy, as it pertains to wildlife, air pollution, wellness of human beings (mentally), temperature change and climate change. Replacing with a young tree, where there is no sun or adequate soil drainage will not replace the benefits of existing tree or supply needs of wildlife, etc.

Also, analysis on drainage runoff and analysis of parking if, I believe it was mentioned, that 12 unrelated individuals would be able to reside on one single family lot.

**Do you have other comments or suggestions related to the scope of the EIS?**

Please include an analysis of viewsheds, in areas that will be affected by allowing additional height to DADU.

Please include owner occupied in an additional alternative.

**Dave Leddel**

11/17/2017 10:57

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Distraction of single family neighborhoods by overpopulation, invasion of privacy in back yards that overlook other backyards, The city already can't enforce all building requirements. What will that allow builders to do? Unscrupulous builders building structures that are sub code without an educated homeowner to insist on a decent quality structure.

**Do you have other comments or suggestions related to the scope of the EIS?**

The city has already allowed construction of apartments that are unlivable in the summer. A lot of these areas could become tenements within a few years. If people can't live a decent life here they can always apply for a job somewhere else. Certain "view properties" seem to be exempted while other whole neighborhoods are not. Leads one to think that the decision process is unfair from the beginning

































































































































































































































































































































































































































































































































**Frank Buono**

11/13/2017 15:22

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Retain all single family zones as they are existing

**Do you have other comments or suggestions related to the scope of the EIS?**

Only Alternative # 1 and make no changes to # 1

**Joshua Reade**

11/13/2017 15:50

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Can Seattle's neighborhoods provide enough parking if the off-street parking requirement is removed? This doesn't seem to be the case as all and will adversely affecting current homeowners and/or renters.

**Do you have other comments or suggestions related to the scope of the EIS?**









































































































































































































# Appendix C: Written Comments

---

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Why was the owner living on site requirement taken away?  
This then becomes a commercial area

Do you have other comments or suggestions related to the scope of the EIS?

name Tamsen Spengler

email tamsenspangler@outlook.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

Side yard should be an option for ADU.

---

---

---

---

name Wendy Kenzell

email wendy@providingchoice.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

what I heard from most tonight is,  
Fear of Developers  
Partly concerns  
Drastic changes in character of neighborhoods

name Brian D Pope  
email bdpope32@gmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Is there a pathway to legalize the many ADUs and ~~no~~ ~~two~~ ~~or~~ ~~more~~ ~~low~~ units already in existence without having to bring all things up to current code? The structures are structurally sound.

Do you have other comments or suggestions related to the scope of the EIS?

---

---

---

---

---

name Bill Boldeur  
email ukseattle.bill@gmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

Removing owner occupancy is a great way to bring affordability and flexibility to the Plan. I hope understand the resistance but I think we can work together to find compromises that will work for those against this proposed change.

name William  
email do.william@yahoo.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

ELIMINATE THE REQUIREMENT FOR SEPARATE UTILITY METERING FOR ADU'S

Do you have other comments or suggestions related to the scope of the EIS?

IMPACT ON SCHOOLS  
IMPACT ON TREE CANOPY COVER  
WEST SEATTLE BRIDGE CAPACITY  
TRANSIT

name SUSAN RHODES

email srhodes@ltwire.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Allow flexibility to assign DADU designation to existing structure if it is net < 1000 sq ft

& allow construction of new large primary structure with ADU on remainder of lot.

Do you have other comments or suggestions related to the scope of the EIS?

---

---

---

---

---

name Karen Schmidt

email karen.h.schmidt@gmail.com

## SCOPING COMMENT FORM

①

Are there additional topics or concerns that you would like to see addressed in this EIS?

WHAT IS IMPACT OF Helping Homeowners AFFORD to build a DADA or convert a space into an ADU.

VS. Outsourcing it to investors by removing Owner occupancy requirement

WHAT is impact of outsourcing the ~~ADU~~ ADU/DADU to an investor ~~who does not live on-site.~~ who does not live on-site.

Do you have other comments or suggestions related to the scope of the EIS?

You can build them <sup>ADU/DADU</sup> now.

I would like to see assistance from the city to make it less expensive & simpler ~~for~~ for a homeowner to add an ADU or DADU.

name MIRANDA BERNER

email mirandasfia@yahoo.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

I'm very concerned about removing the owner-occupancy requirement completely from homes with ADU/PADUs as it creates an incentive for developers to create three rental units in SF zones at a fast pace.

Having a 1 or 2 year occupancy rule could address this

If like to see credits for rainfall runoff management on sewer hookup fees.

name Lawrence Brennan  
email LS BRENNAN@gmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

Which part of the Queen Anne lawsuit did you not understand?

name

Nisa Coan

email

---

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Owner Occupancy is top of my list. This is a must to preserve character of Single Family neighborhoods. If the lot is in an Urban Village or Multi-family Zone maybe this Requirement doesn't need to exist. But it's no longer a SF Zone neighborhood (not just the physical structure) if ~~but~~ the nature & spirit of a "Neighborhood" is not there.

Do you have other comments or suggestions related to the scope of the EIS?

1) Anticipate ways whatever 'use changes' you come up with can be exploited or loop holes than could potential be exploited.

Anticipate and write the code accordingly.  
~~Parking~~ <sup>Parking</sup>: when parking becomes a competitive sport it changes the friendliness of a neighborhood.

name Val Sparleder

email vsparl@yahoo.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Affordability is key. It is intertwined with homeownership, for mother-in-law apartments. The initial investment is low, likely self-financed & trustworthiness of a renter in your house counts more than ~~the~~ maximizing rent. MILs are naturally affordable,

Do you have other comments or suggestions related to the scope of the EIS?

Without homeownership, a mother-in-law apartment is just a duplex.  
I don't understand the drive to eliminate homeownership - who wants this?  
A mother-in-law with homeownership will be more affordable, less than market.

name

Sarajane Diegfueht

email

Sarajane.3h@comcast

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- PARKING MUST BE PROVIDED OR PROHIBIT OCCUPANTS FROM OWNING CARS
- NEED TO CODIFY TAX PROTECTIONS FOR CURRENT SFR THAT THEY WILL NOT BE TAXED ON WHAT COULD BE ON THE PROPERTY VS WHAT IS ACTUALLY THERE

Do you have other comments or suggestions related to the scope of the EIS?

- WILL CHANGES FORCE MORE DISPLACEMENT OF FAMILIES/CURRENT RESIDENTS?
- IMPACT ON WATER, SEWER, STREETS, PARKS, SCHOOLS, SHADE/LIGHT, MORE CONSTRUCTION = ↑ FLOODING, LACK OF DRAINAGE DUE TO MORE DEVELOPMENT
- ASSESS IMPACT FEES ON NEW DEVELOPMENT

name

BUILD CONDOS - NEED A PATH TO

email

HOME OWNERSHIP

BENITA BUCHANAN

Comment from 10/17 ADU EIS Public Scoping Meeting

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Using ACRONYMS is not conducive to communications with non-professionals

Do you have other comments or suggestions related to the scope of the EIS?

Eliminate ACRONYMS  
ADU / DADU / AADU  
from the document

name Sarajane Siegfriedt

email Sarajane3h@comcast.net

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- OVERALL LAND COVERAGE OF LAND
- NOT REQUIRING ADDITIONAL PARKING FOR ADDITIONAL HOUSING IS WRONG
- ENGAGE THE NEIGHBORS NOT JUST THE DEVELOPERS

Do you have other comments or suggestions related to the scope of the EIS?

I'D LIKE TO SEE SOME AERIAL (SIC) PHOTOS OF LAND IN SEA. THAT HAS BEEN COVERED BY BUILDINGS IN THE LAST 10 YEARS. (NOT JUST WHAT YOU THINK MAY HAPPEN WITH FUTURE ADUS) PHOTOS LIKE BEFORE NOW AFTER CAL. FIRES

name ANNE NOONAN

email NOONANDERSON@COMCAST.NET

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

I encourage:

- ① Allow both DADU i ADU on same prop
- ② remove owner occupancy requirement
- ③ remove off street parking requirement

name Lucas Roth

email lucas@raincityproperty.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Allow DADU to be an RV or RV like unit including Tiny Houses built to RV / POT code RV must be fully licensed & ~~have~~ lot must have water, sewer & power hook-ups.

Do you have other comments or suggestions related to the scope of the EIS?

People live in nice RVs & Tiny houses that have a value of \$30,000 - \$100,000 these are nice neighbors!

name Karen Schmidt

email karen.h.schmidt@gmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

I am heartily in favor of the ADU/DADU changes for single family zones.

To be clear, I do not favor widespread upzoning in large single family zones, but ADUs/DADUs can be added while retaining sf zone character, as per the Junctiona Neighborhood Plan.

name Sarah McCaghren

email sexthesarah2020@yahoo.com

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Allan	Goldman	Georgetown
Phone	Email	Council District
<input checked="" type="checkbox"/> CELL <input type="checkbox"/> OTHER 206-465-4314	ajgoldman@a-mac.com	

my son Lee Goldman (206-999-4552) just completed renovating a 7100 yr. old 4 plex in Georgetown. The original building had a garage in the front yard. He would like to build a DADU in the space where the garage used to be.

I spoke at this meeting. to Aly Penhucci regarding this issue.

Thank,

Allan

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
CATHERINE DONALDSON		Loyal Heights
Phone	Email	Council District
CELL OTHER	Catherinemdonaldson@gmail	

ADU EIS scoping needed for —

TRANSPORT  
On-street / off street parking  
what alternatives exist for managing on-street parking?

1 ADU + 1 DADU + 1 main = 3-6 cars in the street

1 main = 2 cars in the street (demand ↑)

large cars (trucks, SUVs) = congestion like Brooklyn, NY.

Is it reasonable to assume residents won't own vehicles?

- who lives in ADUs, do they own cars? Do they really use transit? Can residents of ADUs be required to be carless? (and main house w/o owner occupancy (Alternative 2))

UTILITIES

infrastructure - is city planning to build more stormwater, water, sewer resources in existing streets?

PTO →

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

Rental Registration

How will PROPERTY OWNERS be obliged to register for inspections?

Thank you for addressing these issues in the EIS.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Wendy	Kenzell	HighPoint
Phone	Email	Council District
CELL OTHER	Wendy@providingchoice.com	

I support 2 ADU's  
on property if  
property has 4000 sq  
for detached DADU.

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Louis	Manuta	WS Junction
Phone	Email	Council District
CELL 206-402-2057 OTHER	inlouof@verizon.net	

1- Any increase in density must include increases in infrastructure → transit, roads, sewer, water, schools, etc. To date, this has not been done adequately in our neighborhood.

2- For each new dwelling unit, there must be at least one parking space for that unit, including and especially including the urban village.

- *Lou Manuta*  
4533A 40th Ave SW

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Michelle	Eggert	All South I-90
Phone	Email	Council District
CELL OTHER	michelle@blurei.com	

where is the map of the ADU/DADU available online? I have never seen it online - it is not with the EIS options

(alternatives page & map)

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Lucas	Rath	Highland Park
Phone	Email	Council District
CELL OTHER	lucas@rathcityproperty.com	

we need more housing  
release the restrictions on ADU,

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

Andy Katz - D3/9/22  
(More options for Accessory Residences)  
(Capitol Hill Roster Initiative)

Are there additional topics or concerns that you would like to see addressed in this EIS?

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage. Please expand EIS scope to include an Alternative 3 that addresses these other forms of missing-middle gentle-infill housing!

Do you have other comments or suggestions related to the scope of the EIS?

1. **Change zone name from 'Single Family' to 'Residential.'** Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
2. **Waive building permit fees for 5 years for AADUs and DADUs.** Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. **Use Green Building incentives similar to other permit types:** Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. **Housing Opportunity Overlay.** Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
5. **Upgrade non-conforming housing types and uses, such as duplexes, established before 1995.** There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
6. **Buffer detached houses from higher zones:** If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. **Make accessory dwelling units easier to build.** Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand-alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. **Study using Floor Area Ratio to restrict size of development and incentivize additional housing units.** Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, apply

brakes to gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

9. **Double Ownership.** Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
10. **Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings.** One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.



March 6, 2016

Seattle Mayor Ed Murray  
 Seattle City Council Members  
 Nick Welch, Office of Planning and Community Development  
 Thomas Whittemore, Department of Neighborhoods  
 Seattle City Hall  
 600 Fourth Ave. 2nd Floor  
 Seattle, WA 98104

Re: Backyard cottage development; online community survey and PRCC position on proposed changes

*via: US Mail and email*

Dear Mayor Murray, Council Members, Mr. Welch and Mr. Whittemore,

We are writing on behalf of the Phinney Ridge Community Council (PRCC), and the community we represent, to comment on proposed changes to backyard-cottage (or "DADU") development rules contained in the Department of Planning and Development report, "Removing Barriers to Backyard Cottages."

Our response is based on discussions within our organization, as well as an online survey, which we distributed in our neighborhood and beyond. In our survey, we asked respondents to provide their opinions concerning each of the recommendations contained in the DPD report. Possible choices were "strongly support," "mildly support," "neither support nor oppose," "mildly oppose," or "strongly oppose." The survey also provided respondents with the opportunity to comment on the proposals if they wished.

**We received 363 responses to our survey; 269 of those came from ZIP codes 98103, 98107 and 98117--the ZIP codes that include the area that the PRCC represents.** In this letter we cite the survey responses from these three ZIP codes; however, responses from the broader community were largely consistent with those received from our area. We are happy to share the details of our survey with the City. We believe the responses to our survey results demonstrate a need for the City to proceed cautiously and judiciously in implementing any changes.

The attached report details the response to our survey and our recommendations. In summary, we find that the **owner occupancy requirement must be maintained**; the **present minimum lot size must be maintained**; new flexibility requires **contextual evaluations of parking and design elements**; new **design guidelines** must be implemented; three units on single-family lots (e.g., both an “in-law” apartment and a backyard cottage) should only **be permitted in limited numbers in each area**; and no additional density should be permitted unless **enforceable prohibitions against short-term rentals (“Airbnb”)** are in place.

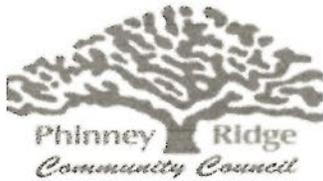
Thank you for the opportunity to comment. We Hope the City will take a thoughtful approach to this issue, and work with neighborhoods to find housing solutions that work for everyone. We would be happy to meet with City representatives to further discuss this issue, and our recommendations.

Sincerely,

Ted Inkley  
Andra Bell  
John Bito  
Jessica Dixon  
Mark Phillips  
Kelly Powers  
Marilyn Smith  
Mike Veitenhans  
Jan Weldin

Committee on Backyard Cottage Development  
Phinney Ridge Community Council

Attachment



## **Phinney Ridge Community Council Response to “Removing Barriers to Backyard Cottages” March 12, 2016**

### **Summary**

The PRCC's response to the potential code changes acknowledges value in making some changes that allow additional cottage development in single-family zones. Our response to individual proposals and the survey results are presented in the sections that follow.

We summarize our positions as follows:

1. The PRCC and our community are strongly opposed to eliminating the owner-occupancy requirement for accessory units, no matter what other changes are made.
2. We also oppose reducing the minimum lot size for backyard-cottage development. Under the present rules fully 60 percent of single-family lots in the City are eligible for cottages, which is ample for any anticipated growth. We are also against raising height limits above one-and-one-half stories, as we believe this would negatively impact adjoining properties.
3. The PRCC does believe that other modifications to rules concerning accessory-dwelling units could be made. As we explain below, however, we believe that the rules applying to development should depend on context, including lot size, parking issues and the like. The City should use backyard-cottage regulations as an opportunity to move away from its “one-size-fits-all” cookie-cutter zoning policies to develop a more nuanced approach toward density—one that will result in more attractive development and increase neighborhood acceptance of zoning changes.
4. Good design is critical. We note that both Portland and Vancouver, B.C., used as examples in the DPD report, have strict design standards for backyard cottages to ensure that they harmonize with the principal dwelling and surrounding neighborhood. Seattle does not have such regulations, and must enact them as part of any zoning changes.

5. Although the DPD report speculates that the proposed zoning changes won't overwhelm neighborhoods, no one can accurately predict what will happen were the changes to be enacted. The City thus should take an incremental approach, so results can be gauged. We also recommend a rule (such as that in Boulder, CO) limiting the number of accessory-dwelling units in a given area, at least initially. It is much easier, and more sensible, to loosen rules as results unfold rather than to radically change the rules and then try to tighten them once the unexpected occurs.
6. If the rationale for encouraging more accessory dwelling units is affordable housing, then there should be enforceable prohibitions against their use as short-term rentals, e.g. "Airbnb's". The idea is to increase housing stock, not create speculative investment opportunities.

## Potential Code Changes

The PRCC responses to the potential code changes set out in the DPD report are as follows:

### 1. Owner-occupancy requirement

First and foremost, the PRCC and our community strongly oppose eliminating the owner-occupancy requirement for those who build accessory dwelling units. We believe that eliminating this requirement would actually *decrease* the affordability of single-family neighborhoods and harm the quality of life in them without accomplishing the City's stated aims.

**Our survey respondents were strongly opposed to eliminating the owner-occupancy rule. About 59 percent were against changing this requirement, while only about 32 percent favored it—by far the highest negative response to any of the potential code changes.**

A number of survey respondents expressed the same concerns felt by the PRCC board: that loosening the rules governing accessory dwelling units while also allowing absentee ownership would drive up the price of single-family houses, encouraging speculative developers and investors to buy existing houses and either tear them down for bigger duplex-type units with backyard cottages, or use the property as an investment because of the increased development capacity. Many respondents also expressed the fear that allowing absentee ownership would decrease the incentive for landlords to maintain their property or ensure that their renters were good neighbors. Fears were also expressed that this change would lead to single-family properties being increasingly used as "Airbnb" type rentals. As one respondent noted:

Eliminating owner-occupancy invites treating properties simply as financial investment opportunities, which fuels speculation and contributes to

runaway housing costs. When owners live on a property, they're personally and socially invested in their community, and tend to better maintain their property and manage their tenants.

To reiterate: Of all the City's proposals, this is the one that we, and the community, most strongly oppose.

## 2. Eliminating off-street parking requirements

**In our survey, a bare majority of survey respondents (about 51 percent) opposed eliminating the off-street parking requirement, while only about 39 percent supported it.**

We believe that there is not a "one-size-fits-all" answer to the off-street parking requirement, and that the rules should be clear but flexible to take neighborhood context into account. For example, some single-family neighborhoods have large lots, garages and relatively few cars parked at the curbside. Others—including Phinney Ridge—have older homes on small lots, often without any off-street parking. In addition, parking is tighter in those single-family neighborhoods near commercial districts or dense multi-family areas than it is in relatively more isolated neighborhoods.

Thus, we recommend that parking requirements should vary depending upon the area, and number of accessory units on a property. Stricter requirements should be maintained for neighborhoods near commercial areas or "urban villages," since spillover parking is already a problem. In addition, any property owner who plans to build both an "in-law" apartment and backyard cottage should be required to provide one off-street parking space. Finally, property owners who construct accessory units should not be allowed to decrease the number of off-street parking spaces on their property in the process (a requirement which we understand is contained in Portland's backyard-cottage policies). However, we do not oppose eliminating the requirement for additional off-street parking for homeowners who construct *either* an "in-law" apartment *or* backyard cottage in other areas, where on-street parking is more likely to be adequate.

## 3. Reducing minimum lot size to 3,500 square feet

The PRCC is opposed to any reduction in the lot size on which backyard cottages may be built, an opinion reflected by a solid majority of those who took our survey. **About 55 percent of survey respondents opposed this change, while only about 31 percent favored it.**

To begin with, we do not see the present 4,000 square-foot minimum as being a hindrance to backyard-cottage development. As the Department of Planning and Development Report ("Removing Barriers to Backyard Cottages") notes, almost

75,000 of Seattle's single-family lots are eligible for backyard cottages under the present rules. This number is more than sufficient.

Moreover, the 4,000-square-foot-minimum rule serves several purposes. One is to help ensure that cottages do not impinge on neighbors' privacy. Another is the protection of vegetation and green space in the City. This is important for flood prevention, mitigation of pollution from runoff, and reducing global-warming inducing gasses. For example, A U.S. Forest Service-sponsored inventory has estimated that Seattle's trees store about 2 million metric tons of carbon, and sequester about 140,000 additional metric tons of carbon each year. And according to one estimate, half of Seattle's tree canopy exists on single-family lots. As one commentator has observed, to preserve those trees, you must preserve the yards.

#### **4. Allowing both "in-law" apartments and backyard cottages on the same lot**

**A plurality--about 48 percent--of survey respondents opposed allowing both types of accessory dwelling units on the same lot, while about 38 percent of respondents favored this change.**

The PRCC also does not believe in a "one-size-fits-all" answer to this question. Recall that every property-owner in a single-family zone is currently allowed to add an "in-law" apartment; thus there is a large capacity for accessory units in all neighborhoods regardless of backyard-cottage development.

Because of potential neighborhood impacts, we believe that three units (e.g., both an "in-law" apartment and a backyard cottage in addition to the principal dwelling) on single-family lots should only be permitted in limited numbers in each area. The number allowed should depend on context—for example, present housing density, lot size and parking issues. We believe it is best for the City to proceed cautiously with this change, so that its impact can be evaluated.

#### **5. Changing design standards**

##### **a. Removing garage and storage space from maximum floor-area calculation**

**In our survey, about 52 percent of respondents opposed this change, while only about 32 percent favored it.**

Once more, we believe that context is important and a "cookie cutter" approach is not appropriate. If the City were to raise height limits to two stories in addition to excluding garage and storage space from area calculations, it could lead to structures that overwhelm adjacent properties. On the other hand, more modest changes could encourage homeowners to add housing while at the same time alleviating neighborhood parking problems. We believe that the change in square-

footage calculations should be allowed on larger lots only; for example, those over 5,000 square feet.

**b. Raising height limits**

The PRCC and our community oppose the height-limit increases proposed in the DPD report (essentially, allowing two-story “cottages” on any 40-foot-wide lot). **About 54 percent of those who responded to our survey opposed this change, while only about 36 percent supported it.**

We believe that two-story structures might exceed reasonable expectations of the size of a “cottage” and would instead (especially if garage and storage areas were excluded from square-footage calculations) become additional, full-size houses. Especially on 40-foot lots, they could overwhelm yards, intrude on neighbors’ privacy and block access to sunlight.

Thus, we believe that height limits for wider lots should be at most one-and-a-half stories, allowing for gabled roofs but not a full-sized second floor. We also believe that design standards should ensure that cottages under no circumstances exceed the height of the principal dwelling unit or adjacent houses, or place neighbors’ lots in shadow. Strict design guidelines, such as those in Portland and Vancouver, would also help maintain compatibility and should be instituted.

**c. Changing standards for the location cottage entrances**

**In our survey, about 47 percent of respondents opposed modifying standards for cottage entrances, while about 35 percent favored this change.** Those who opposed this change expressed concerns about privacy and noise.

The DPD report notes that the present standards are designed to help respect privacy, but states that these standards “constrain” cottage design by forcing entrances to be somewhere other than the “optimal location.” The DPD report does not explain how this restriction reduces the number of cottages built or for whom another location might be “optimal.”

As with other proposals made by DPD in its report, we believe there is not a single answer and there should be a way to take context into account. Factors to be considered should include lot size and configuration, and the location of adjacent homes. Emphasis should be placed on protecting neighbors’ privacy.

###

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Lisa	McCherny	Rainier/Maple Leaf
Phone	Email	Council District
CELL OTHER	lisa@zwhnmed.com	

Our city needs an increase in affordable housing, therefore I support the new alternatives to the AADU / DADU.

My one concern involves owner occupancy - I feel that if there is no owner occupancy requirement, developers may end up owning neighborhoods, rather than homeowners.

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
PAUL	CHAPMAN	Wallingford
Phone	Email	Council District
CELL 206-307-4866 OTHER	PaulFChapman@hotmail.com	4

- ~~Reduce~~ Please study how to reduce permitting fees for ADU + DADU. Remove full permit process for ADUs
- Please study how to reduce/rebate/eliminate the sewer hookup fees so that more DADU can be built @ lower cost
- Please study how to increase lot coverage limits so that more DADUs can be built. e.g. don't include permissible structures like decks in the lot coverage calculation.

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Eddie	Inffitts	Wallingford
Phone	Email	Council District
CELL 206-898-5168 OTHER	eddiearwon@gmail.com	

From

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

Office of Planning and Community Development. PO Box 94649 . 600 4<sup>th</sup> Ave, 5<sup>th</sup> Floor, Seattle, WA 98124 . 2035@seattle.gov

# COMMENT FORM

**EVENT:** Comprehensive Plan Amendments and ADU EIS Scoping

OPTIONAL:

First Name	Last Name	Neighborhood
Elaine	Nonneman	Miller-Madison
Phone 206 325-6762	Email	Council District
CELL	enonneman@yahoo.com	3
OTHER w/o		

- Don't make homeless #'s the excuse for the city's Grand Bargain w developers
- This city allows massive development by outside + foreign investors to remain virtually vacant. Amazon is providing space for homeless in its complex. Make that a condition for ALL investor building.
- When property owners are footing the bill for ADU/DADU density, they should have design + scale latitude according to features of their lot. One-size-fits-all WILL NOT HELP!
- Keep requirement for owners to live on ADU/DADU properties. I'm surrounded by properties with absentee landlords + all need better maintenance!

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

Dept of Neighborhoods sponsored meeting at Hale's Thursday, October 26, 2017, 6 – 7:30pm

**Accessory Dwelling Units (ADU)** - The City of Seattle is asking for ideas on what Environmental Impact Statement (EIS) that will study the effects of removing barriers to creating accessory dwelling units (ADUs) and backyard cottages. An ADU is a secondary unit inside, attached to, or in the backyard of your home. We want to help you understand the purpose and process of the EIS and find out what is important to you.

Janis Fulton  
4336 Baker Ave NW  
Seattle WA 98107

1. HALA and Comprehensive Plan and Mandatory Housing Affordability (MHA). What's the difference?

2. HALA is promoting more <sup>density</sup> in the city. There are many instances in my zoned single family neighborhood of modest homes that are to my mind perfectly "affordable and livable" being bought, razed and "McMansions" extending from lot-line to lot-line being built in their stead. Why doesn't HALA repeal the regulations that allow developers to do this? Why do people with the means to buy a huge home get to be the ones that have a single family home, get to preserve their privacy and not share the lot with others? Why do they get to ruin their neighbors' privacy by looking down into their neighbors back yards from their 2<sup>nd</sup> story windows and blocking the sun that shines on their gardens and fuels their solar panels. The "McMansion" owners don't have to give up much at all compared to more modest homeowners.

**Less affluent homeowners are being asked if not told to give up privacy, collegiality, cohesiveness, neighborliness, light for our gardens or solar panels, on street parking and the essence that defines a Neighborhood.**

2. How many ADU's are rented as Bed and Breakfast's? How much money are these B&B's making for their owners compared to ADU's being rented long term. Hearsay has it that renting the units as B&B's makes more money than long-term rentals. What evidence do the architects of HALA give that ADU's will be rented long term when more money is to be made by renting them as B and B's and how does this help increase density?

3. The city touts ADU's as a way to increase affordable housing. When apartments, even ones of only 345 square feet, are renting for huge sums of money, why would an 800-1000 sq. ft. ADU with somewhat more privacy in a neighborhood rent for less?

2. Will the zoning designation change? And will that affect any of the regulations that presently define a single family zoned area?

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- You need to be transparent with the public-
- Needs to be a thorough environmental review
- Voters should have a say in this large transformation of Seattle - Let's have a referendum vote

Do you have other comments or suggestions related to the scope of the EIS?

- Need to have a realistic plan for mitigating increased waste water run-off that will result from increased ground coverage - West A is already unable to deal with existing run-off - This infrastructure needs to be →

name

Eliot Brenowitz

email

brenowitz(at)gmail.com

Comment from 10/26 ADU EIS Public Scoping Meeting

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Thank you for this Event. I'm a Resident in Ballard Renting living on a basemant \$1600 having a lot of problems with parking and tickets because not enough parking anymore. Beautiful friendly Neighborhood safe for me and my daugthes, Library, cinemas, Restaurant everything walking distances, but Developers are changing our City

Do you have other comments or suggestions related to the scope of the EIS? ☹️

I'm learning so much from differents opinions and people about why this is not good in our city and to our Neigborhood. Spanish is my first language, Latinos also have a VOTE but if is no education or information to our communities; will not be able to stand up or have idea why or for what we are voting

name \_\_\_\_\_

email \_\_\_\_\_

fxbarra42@gmail.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

neighborhoods need to be fully engaged in discussing alternatives. One alternative is to do nothing.

Do you have other comments or suggestions related to the scope of the EIS?

Multiple ADUs on any given block w/ no requirement for off street parking is totally unworkable in most neighborhoods in Seattle. If ADU EIS is passed as is, the neighborhoods will look like rats in a maze!

name

Marty Miller

email

marty.miller.cissp@gmail.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Exceptional tree Removal Not allowed in ADU's under any exemption.

Do you have other comments or suggestions related to the scope of the EIS?

This is the biggest land grab by Developers + the City yet. Like no neighborhood can joss please.

name

Richard Ellison

email

climbwall@msn.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- 1. unit size too large - mother-in-laws need to stay small size
- 2. keep hts low - all neighbors won't hate you forever after
- 3.

Do you have other comments or suggestions related to the scope of the EIS?

---

---

---

---

---

name Pat Carroll-Crippen  
email patutie1@comcast.net

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Please DO NOT require parking. Parking is not an intrinsic part of housing and this req. suppresses affordable housing.

Do you have other comments or suggestions related to the scope of the EIS?

YES. NO owner-occupied requirement. Let ADU's be a flexible option for young homeowners, empty-nesters, etc. - make them easy + cheap.

name E. Johnson

email enjohnst@gnail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- 1. more loss of mature trees of difficulty replanting if building lot line to lot line
- 2. Loss of light surrounding neighbors
- 3. ↑ traffic congestion, ↑ parking not mandated
- 4. Need owners on site - many new apts in Seattle have neglected green space, as developers/managers only want \$ from rent

Do you have other comments or suggestions related to the scope of the EIS?

---



---



---



---

name Pat Carroll Crippen

email patuties@a.comcast.net

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

I SUPPORT RELAXING OWNER OCCUPANCY REQUIREMENT.  
I SUPPORT DAOU & AADU ONE ONE LOT.  
PLEASE DONT CHANGE HEIGHT LIMITS ON DAOU.  
PLEASE DONT CHANGE LOT COVERAGE REQMT.  
THIS WILL RESULT IN LESS TREE CANOPY, & MORE =  
RUNOFF.

name Omar Jepperson

email omarwj@hotmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

PLEASE CONSIDER REDUCING SIZE  
OF LOT ACCEPTABLE FOR  
DADU TO 3000 SF

name ERIC

email ericadman01@hotmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Please also study putting duplexes & triplexes in SF zones.

Do you have other comments or suggestions related to the scope of the EIS?

Please be mindful of the future! Don't listen to the people of the past.

name Zachary Lubarsky  
email zach.lubarsky@outlook.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

I would like the EIS to address how each alternative ~~also~~ helps further (or not) the following goals from the GROWTH MANAGEMENT ACT -  
 concentrated urban growth, sprawl reduction, affordable housing, regional transportation, open space & recreation, environmental protection.

Do you have other comments or suggestions related to the scope of the EIS?

Additionally, I think the EIS needs to look at the impacts BOTH within the city and the larger county.

~~How~~ How will each option impact our region in terms of pushing affordability out & increasing transportation/commute times & climate impacts

name Brooke Brod

email brooke.brod@gmail.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Will there be specific "occupancy" requirements associated with ADU's.

What construction "criteria" will be applied.

Pest control programs

Waste management

Traffic control

Do you have other comments or suggestions related to the scope of the EIS?

It seems to me that the scope of owner-occupancy of off-street parking are "separate" issues or should be dealt with separately.

name Lawrence Bush

email lbush1953@comcast.net

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

PLEASE STUDY IMPACT OF FAILING TO ALLOW MORE HOUSING IN SINGLE FAMILY ZONES AND HOW IT WILL INCREASE DISPLACEMENT & GENTRIFICATION

Do you have other comments or suggestions related to the scope of the EIS?

SINGLE FAMILY ZONING WAS FOUNDED AS A MEANS TO EXCLUDE POOR HOUSEHOLDS AND SHOULD BE ABOLISHED

name MIKE ELIASON

email

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

look at many houses  
on one lot.

Do you have other comments or suggestions related to the scope of the EIS?

name clementine. 7  
email Brian

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

WHAT ARE THE COMPETING ECONOMIC ELEMENTS OF CHANGING FROM FAMILY HOMES TO INVESTOR-OWNED RENTAL UNITS  
WHAT WILL THE COST OF "HOME" BUYING DO WITH AN INCREASE IN PROSPECTIVE BUYERS

Do you have other comments or suggestions related to the scope of the EIS?

---

---

---

---

---

name GREGORY HILL

email greg.hill@ibigroup.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Consider leaving the ADU & DADU policy the way it is now!

- The proposed changes do NOT increase affordable housing. They will rent at Market rate!

Do you have other comments or suggestions related to the scope of the EIS?

- Must have Owner occupancy
- Must have restrictions (current) on size, scale, distance from neighbors, etc
- Limit ADUs per lot
- Require parking for each ADU

name Michael Richards

email Michaelrich@MSN.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Streamlined permitting process, maybe over-the-counter /STFI for ADUs under a certain threshold?

Do you have other comments or suggestions related to the scope of the EIS?

Strongly support the study of Alternative 2 points. Especially re off-street parking.

name \_\_\_\_\_

email \_\_\_\_\_

SCOPING COMMENT FORM

Alternative 1 only

Are there additional topics or concerns that you would like to see addressed in this EIS?

START Planning with each community residents, parking, infrastructure and costs to support growth, older housing cost of loss to middle income and less in city

Do you have other comments or suggestions related to the scope of the EIS?

go back to start and do ground up, not top down

name Steve Rabinello

email steverabinello@yahoo.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

---

---

---

---

---

Do you have other comments or suggestions related to the scope of the EIS?

YES TO ALL OF ALT 2  
AND ADD MAKE RSL & L ZONES  
AROUND GREENWOOD NEIGHBORHOOD  
THAT AREA CAN INCREASE URBAN  
VILLAGE.

name ji yun

email chrys\_kim@yahoo.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

I Endorse beyond backyard cottages proposals!

Do you have other comments or suggestions related to the scope of the EIS?

ⓐ would like to study third option that rezones single family housing to something denser like residential small lot

name Erin Sterling

email erin.sterling@gmail.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Current setbacks create restriction or reduce scale of potential DADU's. Why not 5' from property line? This also would prevent elimination of existing trees.

Do you have other comments or suggestions related to the scope of the EIS?

DADU's + ADU's shift some development costs to property owners, so decisions on them should defer to property owners.  
KEEP required occupancy of owners.

name Elaine Nonneman

email enonneman@yahoo.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

I endorse the MOAR recommendations for Beyond Backyard cottages and

Do you have other comments or suggestions related to the scope of the EIS?

Please consider an Option 3 where we increase the density further than an ADU/DADU - for example, replace existing SFS000 with RSH.

name Ben Anderson

email

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

Removing all off-street parking is not recommended. There should be at least one space required for pick-up, drop-off, the elderly and children's friends (assuming you want families to live in these zones) in ALL zones.

Do you have other comments or suggestions related to the scope of the EIS?

Why have things be black/white & remove all barriers, I think owner occupancy of one unit is needed. Too often you are generating "cash cows" for people rather than creating community & responsible ownership. Keep the requirement for owner occupancy.

name \_\_\_\_\_

email \_\_\_\_\_

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

- impact on the tree canopy
- study ~~whether~~ recent developments that have not required any off street parking. ~~Do residents~~ ~~have~~ what percentage of residents have/do not have vehicles? What has been the impact?
- Study impact of covering increased percentage of the lot. ~~Need~~ Need for permeable materials. Ensure that runoff water does not damage other lots.
- What is impact of increased density to adequacy of ~~the~~ sewer system? Water pressure?
- importance of rigorous design review to make <sup>compatible with</sup> neighborhood

name

Judie Clarridge

email

dclarridge@aol.com

Comment from 10/26 ADU EIS Public Scoping Meeting

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

What about middle class housing for teachers restaurant workers etc

Do you have other comments or suggestions related to the scope of the EIS?

name Rosemary Byrne

email rose.seabuck@msn.com

## SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

1. Measurement of impacts yearly, not just in 5-7 years or more
2. effect on tree canopy, transit and walkability and requirements for mitigation/amenities for livability as density increases
3. Consider incentivizing ADUs for homeowners as we have

Do you have other comments or suggestions related to the scope of the EIS? with solar, etc

2. look closely at impacts:
    - a. raising size of DADA (1000sq' is almost as big as our house!!)
    - b. reducing min. lot size
    - c. return owner occupancy - if you don't what is impact on community?
- Displacement of seniors?

name

LINDA CLIFTON

email

lclifton4@mindsping.com

SCOPING COMMENT FORM

Are there additional topics or concerns that you would like to see addressed in this EIS?

*or eliminating*

*Consider reducing setback requirements for decks. — ~~the~~ setback requirements for car storage are looser than requirements for housing. This is poor prioritization.*

Do you have other comments or suggestions related to the scope of the EIS?

*We need to encourage greater density in the vast expanse of single-family zones. Consider reducing permitting fees for ADUs & DADUs.*

name \_\_\_\_\_

email \_\_\_\_\_

November 14, 2017

RE: Hearing Examiner File W-16-004

Secondary Housing on Main Lot

Regulations concerning ADU and DADU in Seattle

Much of the city is zoned multi-family and should be built out to provide affordable housing before making changes to single family zones. Looking on line, for example at AirBNB one finds that many of the existing backyard cottages being used for short term rentals. Therefore, expanding their number will not provide affordable housing and will make our neighborhoods less desirable for long term residents.

I find the lack of on-site owner occupancy after one year troubling. Adding that to the situation where the regulations would then have both an ADU and a DADU would result in an apartment complex of 3 units----a rezone, if you will.

In addition, bulk and height of ADUs and DADUs are not addressed adequately.

The impact on street parking is not adequately addressed considering that 8 people can live in the 3 units. It seems reasonable that 6 of those would be adults and likely that a minimum of 3 cars would appear on the street.

When the number of units could increase 3-fold, the impact on the City of Seattle utilities (electricity, gas, water, sewer) has not be adequately addressed.

In Seattle, single family zoning is a unique asset to this city and the value of its narrower streets, sidewalks and walkability, unique diversity of housing types and strong neighborhood social networks. Neighborhood-based planning should be preserved.



William H. Bush  
660 W. Lee St.  
Seattle, WA 98119  
Ph: 206-282-3914

October 30, 2017

Hello Team HALA/MHA,

I am excited about the options that the ADU-DADU Alternative 2 offers!  
However, I feel that it is rather narrow and should be expanded to include more variations of ADU-DADU.

**1) Allow flexibility in designating which structures on the lot are the DADU and which are the Primary Structure+ADU.** If the existing primary structure is under 1000 sq ft (living space only, excluding garages, storage, unfinished basements), then existing structure may be designated as the DADU, and a new PrimaryStructure + ADU (duplex) may be constructed on the rest of the lot. Thus, it will be possible to have a DADU at the front of the lot, and the PrimaryStructure+ADU at the back of the lot.

**2) Permit the DADU and ADU to be a RVs or tiny houses (built to National NFPA 1192 Trailer Code, DOT compliant, licensed as an RV trailer).** Require that homes are fully licensed and include toilet, bathing and cooking facilities.

Allow utility hook-ups to be modified to add mandatory hookups for water, sewer, and electricity for each RV or TinyHouseRV.

Utilities: owner/builder will have the option of separate electricity and water meters for the DADU and ADU. Metering may be provided by Utilities (Seattle City Light and Seattle Public Utilities) or via private submetering, or only one set of meters for all units.

May require revisions to parking codes. By allowing parking-living of RV with RV parked on the side lot or rear lot of house.

Our family has a mobile home park in King County. We have had RVs for 20+ years. The RVs tend to be high end houses, very well cared for, who also take great care of the landscaping. **They are excellent tenants and great neighbors.**

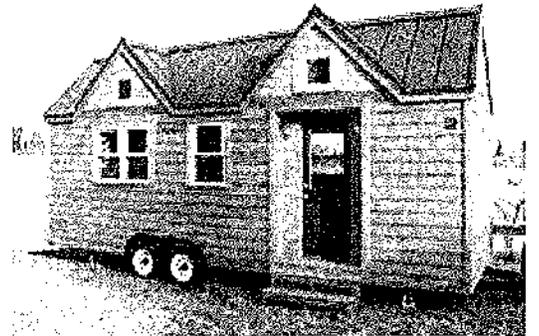
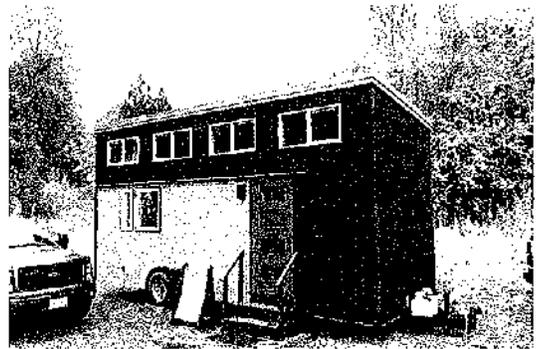
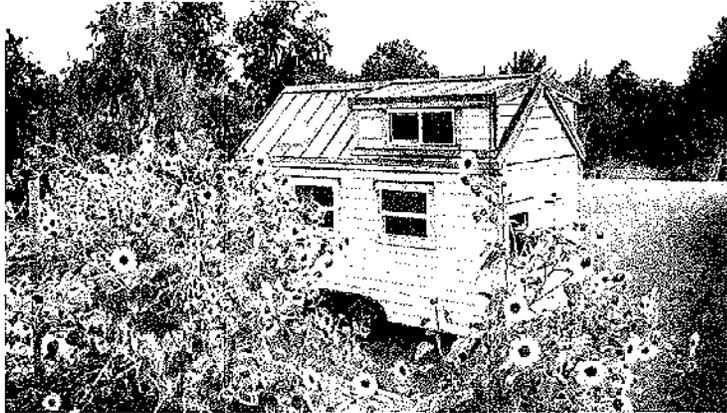
Tiny houses are a nationwide new trend in home ownership. Tiny house organizations report the largest barrier to tiny home ownership is finding land to park the house on. Due to land use regulation. Seattle can become a nationwide leader in allowing tiny houses in residential zoning!

Best regards,

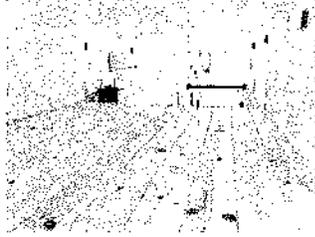
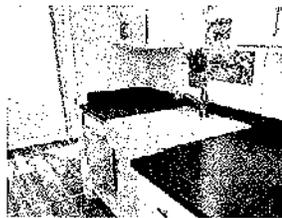
*Michelle Eggert*

Michelle Eggert  
4701 SW Admiral Way  
Seattle, WA 98116  
michelle@blaurei.com

<https://seattletinyhomes.com>

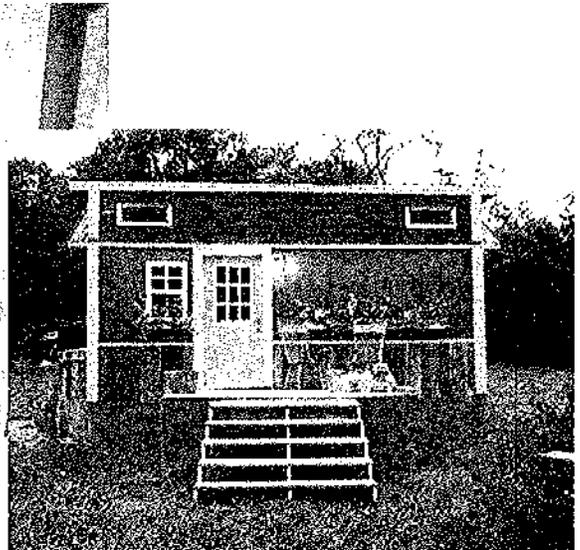
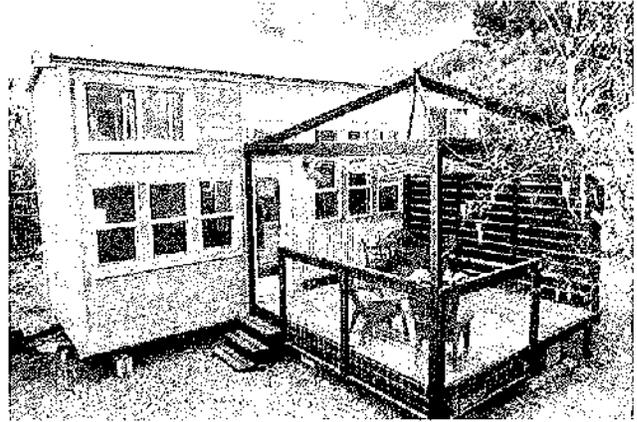


<http://www.tinymountainhouses.com/>



Total Square Feet	333 sq ft
Main Floor	201 sq ft
Master King Loft	92 sq ft
Twin Loft	39 sq ft
Sleeps	4-6
House Width	8' 6"
House Length	24'
House Height	13' 5"
Ceiling Height	10' 8"
Height To Loft	6' 9"
Loft Height	44"
Base Price	\$58,990

<http://www.tinymountainhouses.com/>

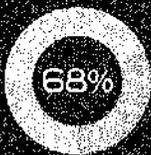


# TINY HOUSES

<http://thetinylife.com/what-is-the-tiny-house-movement/>

*And the people who live in them.*

The tiny house phenomenon redefines what makes a house a home, empowers the people for a better future and leads a movement that breaks the mold every day. Tiny house people come from all walks of life. This is their story.



**SIXTY-EIGHT PERCENT**  
of tiny house people have no mortgage,  
compared to 29.3% of all U.S. homeowners!

## YOU CAN BANK ON IT



55% of tiny house people have more savings than the average American, with a median of \$10,972 in the bank.

## A HOME THAT YOU OWN



78% of tiny house people own their home, compared to 65% of homeowners with traditional houses.\*

## ✕ THE REAL COST OF HOUSING ✕

The average cost to build a tiny house is \$23,000 if built by the owner.



The average cost of a standardized house is approximately \$272,000.



And \$209,704 interest on a 4.25% 30-year loan and it's \$481,704!



## TINY HOUSE, BIG LIVING



The average tiny house is 186 sq/ft while the standard U.S. house takes up nearly 2100 sq/ft. That adds up to nearly 11.3 Tiny Houses!

## APPROXIMATELY 2 OUT OF 5 TINY HOUSE OWNERS ARE OVER

# 50 YEARS OF AGE

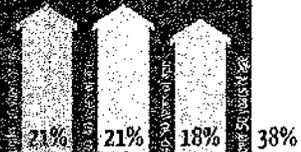


## ISLAND SAVINGS TIME

32% of tiny house people have more than \$10,000 saved for retirement.



62% of tiny house people have less than \$5,000 saved for retirement.



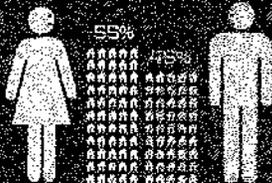
## GIVE YOURSELF SOME CREDIT

89% of tiny house people have less credit card debt than the average American, with 65% of tiny house people having zero credit card debt.



## THE FAIRER SEX WINS

More women own tiny houses than men.



# \$42,038

per capita income of tiny house people.

EARNING \$478 more annually than the average American.

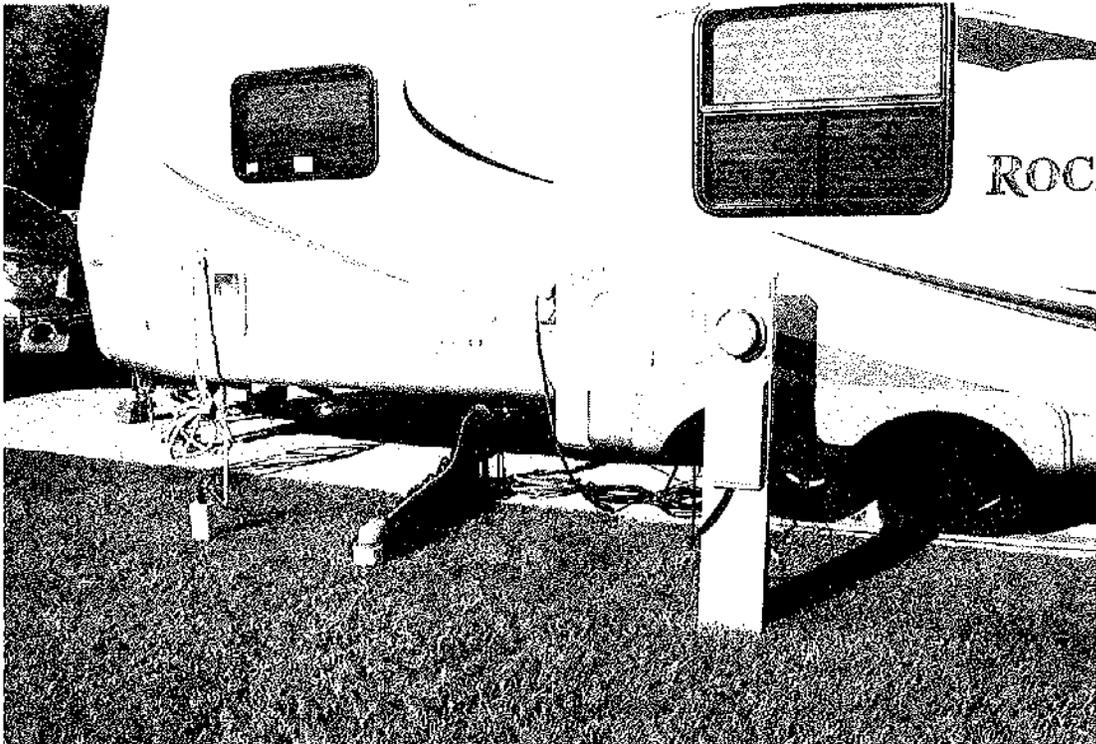
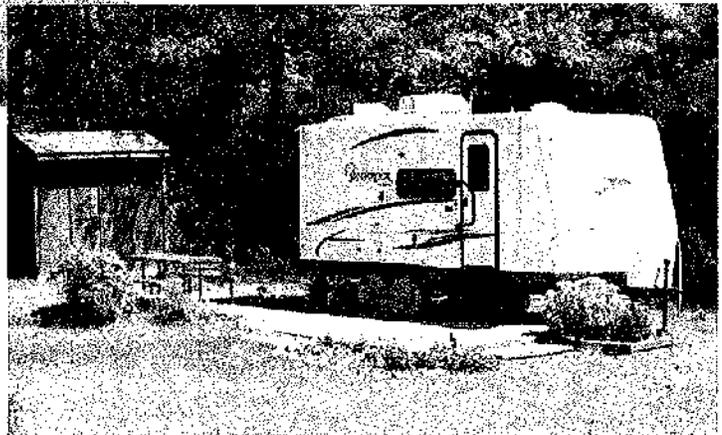
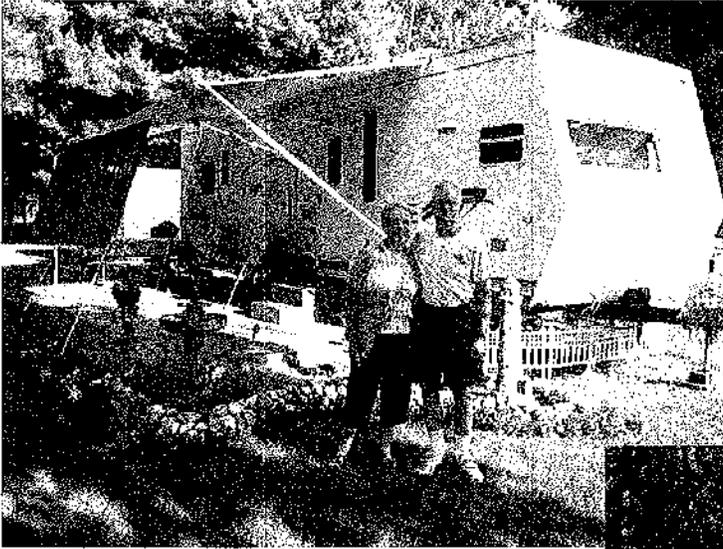


Tiny house people are twice as likely to have a masters degree, while they are on par with the average college graduation rates.



Source:  
1 - [http://www.tinyhouse.com](http://http://www.tinyhouse.com)  
2 - [www.irs.gov](http://www.irs.gov)  
3 - <http://www.fair.org>  
4 - <http://www.collegeboard.com>  
5 - <http://www.bls.gov>





Rec'd 10/31



ACCESSORY DWELLING UNITS EIS

SCOPING COMMENT FORM

ACCESSORY DWELLING UNITS EIS

SCOPING COMMENT FORM

The City of Seattle is proposing to change regulations in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADU) in single-family zones. The proposal involves allowing two ADUs on one lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of detached ADUs.

We are preparing an Environmental Impact Statement (EIS) that will analyze two alternatives and identify the impacts of each alternative. We want your feedback on what to consider and analyze as we explore small-scale housing options in Seattle's neighborhoods. Complete this comment form at the October 17 or October 26 public meetings or submit your comments by 5:00 p.m. on November 1, 2017:

by email to

ADUEIS@seattle.gov

online at

seattle.gov/council/ADU-EIS

In writing to

City of Seattle  
Council Central Staff  
PO Box 34025  
Seattle, WA 98124-4025  
Attn: Aly Pennucci

Are there additional topics or concerns that you would like to see addressed in this EIS?

Yes, a discussion of short-term / Air BNB rentals under Alternative 2 - Would they be allowed? Under what circumstances?

Do you have other comments or suggestions related to the scope of the EIS?

Yes, I want to reiterate my support for Alternative 2 & hope that the process will proceed in a expeditious manner. I have an aging mother in California who would like to live near her grandchildren.

name

John Ray-Keil

email

jraykeil@gmail.com

Rec'd  
11/14

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
**Petition to Seattle EIS Scoping for Accessory Dwelling Units (ADU and DADU) within Single-Family Residential Zones**

The undersigned Seattle residents *do not support* proposed Alternative #2 proposed for Accessory Dwelling Units (ADU) as we find the alternative's parameters are contrary to the goal of "livable communities", diverse affordable housing options, and consequential reduction of Seattle's heritage and exceptional trees and 'green canopy'.

Therefore, this petition calls to broaden the scope of the Environmental Impact Study (EIS) regarding the City's proposed incentives for Accessory Dwelling Units (ADU). The EIS shall include the additional environmental impact parameters for all Alternatives being considered:

- A mandatory evaluation period 2 and 4 years after implementation to ensure any Attached and Detached ADU legislation is achieving the intended goals.
- Incremental impacts to Seattle's designated Tree Canopy and goals for 30% coverage by 2037.
- Given increased density proposed by the City with Alternate #2, the EIS shall require enforcing tree protection rules for proposed ADU developments in accordance with similar provisions for *Lowrise Zones* including Streamlined Design review (including SMC 23.41.018, 23.09.320, 23.44.008, 23.45.015 and 25.11.060 to 070).
- Analyze the demand for additional public park space in residential areas where open space is replaced by ADU on single-family lots.
- Impact with or without ADU financing options incentives for existing homeowners (verses only speculative ADU development.)
- Impacts of short plat subdivisions of lots over 6,000 square feet by those owners and developers looking to further increase the potential number of dwellings within single-family residential zones.

In addition to the expanded scope of the EIS for all alternatives as outlined, this petition calls for additional **Alternative Number 3** (hereafter 'ALT 3') to be studied within the Study:

<u>Criteria</u>	<u>ALT 1 (No Change)</u>	<u>ALT 3</u>
<b>Number of ADU Allowed on a single-family lot</b>	One Attached ADU or one Detached ADU, but not both.	Same as ALT 1. If at least 80% of the Attached ADU gross floor area is below the primary dwelling, then both a detached ADU and attached ADU is allowed.
<b>Parking</b>	One off-street parking space is required for the ADU unless within Urban Village.	Same as ALT 1. Exception to ADU parking only allowed if frequent transit options are demonstrated for the property.
<b>Owner Occupancy</b>	Owner must occupy the primary residence or ADU at least 6 months in a year.	Same as ALT 1. Owner must occupy the primary residence or one ADU at least 6 months in a year.
<b>Minimum lot size for a DADU</b>	4,000 square feet	Same as ALT 1: 4,000 square feet
<b>Maximum square footage of ADU</b>	Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 800 square feet <i>including</i> garage and storage areas.	Similar to ALT 1: Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 1000 square feet <i>including</i> garage and storage areas.
<b>Maximum Height of ADU</b>	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Same as ALT 1.
<b>Lot Coverage Limit (of Primary Residence)</b>	35% of lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for lots under 5,000 square feet	35% of parent lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for parent lots under 5,000 square feet

**Criteria (continued)**

**Rear Yard Coverage Limit**

**ALT 1 (No Change)**

40% of a rear yard can be covered by DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.

**ALT 3**

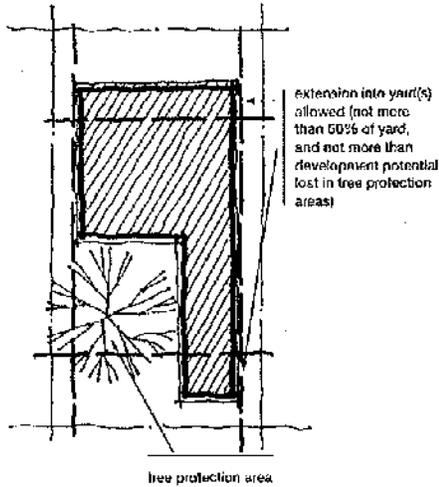
Provide 150 SF of private amenity area for each ADU plus 150 SF of common amenity area for all ADU. (Similar to SMC 23.45.522 - Amenity area.) This area excludes required side and rear yard setbacks less than 10 feet in width. Remaining rear yard can be covered by DADU and accessory structures (like a garage).

<b>Location of entries</b>	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right of way.	Same as ALT 1.
<b>Roof features</b>	No exception to the height limits are allowed for roof features on accessory structures.	Exceptions to the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
<b>Household Size</b>	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU.	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU. If the lot qualifies for Attached and Detached ADU, the limit = 12.
<b>MHA Requirements</b>	Not applicable	Same as ALT 1
<b>Rental Registration and Inspection Ordinance</b>	No change to present requirements.	Same as ALT 1

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2</b>
<b>Number of ADUs allowed on single-family lots</b>	A single-family lot can have one ADU or one DADU, but not both.	A single-family lot can have one ADU or one DADU.
<b>Parking</b>	One off-street parking space required for each ADU or DADU unless the lot abuts an alley or street.	No off-street parking required.
<b>Accessory structures</b>	An accessory structure other than a garage on the ADU/DADU lot cannot be taller than the ADU/DADU structure it serves.	No height limit for accessory structures on ADU or DADU.
<b>Maximum lot size for a DADU</b>	4,000 square feet	3,000 square feet
<b>Maximum square footage</b>	ADU: 1,000 square feet, including garage and storage area. DADU: 800 square feet, including garage and storage area.	ADU: 1,000 square feet, including garage and storage area. DADU: 1,000 square feet, including garage and storage area.
<b>Maximum height</b>	No change from existing height limits, which vary by zoning and range from 10-29 feet.	Height limit is 13 feet from the ground level to the top of the roof.
<b>Setback requirements</b>	15-foot minimum setbacks for side and rear setbacks and 10-foot minimum setbacks for front setbacks.	10-foot minimum setbacks for side and rear setbacks and 10-foot minimum setbacks for front setbacks.
<b>Rear yard coverage limit</b>	40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	60 percent of a rear yard can be covered by a DADU and other accessory structures. For DADUs with no off-street parking, and accessory structures on accessory structures, a less strict coverage limit.
<b>Location of entries</b>	DADU entrances cannot face the nearest side or rear lot line unless the lot abuts an alley or other public right of way.	DADU entrances can be on any lot side if setback is 10 feet from the lot line if located on the facade of the nearest side of the lot to the adjacent lot or alleyway.
<b>Roof features</b>	No exception to the height limit are allowed for roof features on accessory structures.	Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
<b>Household size</b>	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU.	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU. If the lot has an ADU and a DADU, the limit = 12.
<b>MHA requirements</b>	Mandatory Homeing Affordability (MHA) does not apply to the creation of ADUs on Single-Family lots.	Mandatory Homeing Affordability (MHA) does not apply to the creation of ADUs on Single-Family lots.
<b>Rental Registration and Inspection Ordinance (RRIO)</b>	Property owners using one or more units on a single-family lot must register the units with the city and pay a fee and must have a minimum number of units.	Property owners using one or more units on a single-family lot must register the units with the city and pay a fee and must have a minimum number of units.

Figure 1 – (above) for reference, current alternative as published by the City of Seattle

**Figure 1. Example of tree protection in single family zones**



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 8:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3 c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications-CAD/scan242.pdf>

**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

*Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.*

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name David Crippen Signature David Crippen  
 Street Address 6811 Phinney Ave N. or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes No Date 11/17

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_

Street Address \_\_\_\_\_ or email \_\_\_\_\_

Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

---

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_

Street Address \_\_\_\_\_ or email \_\_\_\_\_

Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

---

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_

Street Address \_\_\_\_\_ or email \_\_\_\_\_

Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

---

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_

Street Address \_\_\_\_\_ or email \_\_\_\_\_

Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

Rec'd 10/31

October 27, 2017

Hi Aly,

We didn't exchange names last night at the EIS public scoping meeting, but I'm Jack Pollard. I was the really big guy wearing the baseball cap. It was a pleasure to meet you last night! I told you some about the Star Community, and our housing effort.

You seemed interested in Star Community, and our housing model, so I decided to give you a little more information. The Star Community housing model emphasizes both affordability and density, and has a strong emphasis on community values and interpersonal connection. This is how we do it...

As background, the Star Community is an association of about 35 people, ages 18-67, plus some children (including a brand new baby due any day!). We live together cooperatively in five 7-8 bedroom houses in Seattle (Green Lake, Capital Hill, Beacon Hill, Seward Park, and Rainier Beach). We have been organized for about three years. We just bought our first house, the Rainier Beach property, and rent the others. Star Community has no formal organization or structure, and no specific membership requirements. Instead, Star Community has several shared, core values, including personal transparency, interpersonal support, creation of a healing culture for ourselves and for the wider world, and living a rich, rewarding life without needing a lot of money.

Specifically, in terms of housing, Star Community is creating shared, cooperative, affordable housing. By this I mean:

- a. Shared Rental (or Mortgage) Costs. Our average room rent across the five houses is approximately \$650/month, substantially below Seattle apartment rents;
- b. Ensured Affordability. Room rents are modified to make sure that everyone can afford a reasonable room. Our goal is that everyone who wants to join Star Community and share our mission will be able to do so. So far, we've been able to do this;

- c. Shared Food Costs. With shared meals and shopping, food costs are minimized, meals are healthier, and social connections at mealtimes are strengthened;
- d. Development of Interpersonal Skills. Star Community emphasizes the development of skills and practices that help us maintain personal transparency, build interpersonal relationships, and navigate the inevitable conflicts that come with shared living. We have weekly shared events where we discuss ongoing personal and interpersonal processes;
- e. Creation of Shared Events. We routinely create shared events that strengthen our social and community connections (e.g., movie nights, workshops, and large celebrations such as Thanksgiving). Most events are open to individuals outside of Star Community. With so many members having so many interests, we have at least two to three shared events each week.

I bring all this to your attention because there are ways in which our housing model is not supported by Seattle housing regulations. In fact, the regulations are sometimes adversarial.

- a. Eight Unrelated Person Limit. The limit of eight unrelated persons in a dwelling unit is one barrier. There are large homes for rent in Seattle in the 8+ bedroom range. They could be adapted to our housing model, where perhaps 10-12 people could share the house. But the economics of rental pricing require more than eight people live there to afford these properties, and thus we can't utilize the space.
- b. Congregate Housing. We have explored the possibility of creating (either by purchase or construction) congregate housing in Seattle. The advantage of congregate housing is that a boarding house-like living situation can be created that is not subject to the eight unrelated person limit. Practically speaking, congregate housing is possible in only very limited situations in Seattle. Star Community has given up trying to construct a building under congregate housing regulations. It would be great if the congregate housing regulations were liberalized to allow for more flexibility.

c. There is No "Boarding House" Option. We believe the city's housing philosophy should be amended to support an updated "boarding house" model. In a boarding house model, multiple bedrooms share a kitchen/living space along with multiple (but not necessarily private) bathrooms. This is conceptually different from studio or one bedroom apartments, where every unit has its own bath, bedroom, and living space. Because the boarding house approach amortizes the costs of the kitchen/living/bathroom spaces over more people, it creates more affordable living spaces with fewer resources. This is the model that Star Community is *de facto* implementing. If this model was officially possible, it could be implemented in the city creating more affordable and higher density housing.

It's worth noting that an individual working at minimum wage is not able to reasonably afford even a studio apartment, much less an ADU. The Boarding House option would make this possible.

Also, I want to acknowledge that the boarding house model sometimes generates fears of transiency, and the associated problems. There is a simple remedy: require a large majority of the leases in the boarding house model to have a minimum lease length (e.g. 12 months).

Thanks for your time on a rather lengthy letter—didn't mean to write so much!

Best Wishes,



Jack Pollard

[jack\\_j\\_pollard@yahoo.com](mailto:jack_j_pollard@yahoo.com)

206-683-3789

PS—I've appended my already submitted comments on the AUD EIS.

I have two specific concerns with the EIS process.

1. I view the need for more affordable housing as a high policy priority for Seattle. Many of my friends are being forced out of the Seattle housing market because of the rapidly rising prices.

I don't know how the EIS process will weigh the relative benefits and costs associated with the ADU changes. But my hope is that the EIS weights the basic benefits of increased ADU housing as more important than the possible negative impacts. The consequences of not accepting and coping with the impacts of greater housing density is that Seattle will become a town affordable by only the top 25% of the population.

2. My second concern is more specific, and is about the parking alternatives currently presented. I believe there are other possible alternatives that could be explored:

- a. First, the need for off-street parking could be eliminated if only one AADU or DADU exists. If both an AADU and DADU are present on a single-family lot, then one off street parking space could be required.
- b. Second, Seattle neighborhoods vary significantly in off-street parking congestion. Therefore, I would examine the feasibility of off-street parking requirements being adjusted to the existing residential density.

For example, I have lived in the Green Lake neighborhood (on Stroud Ave. N) where parking is very tight, streets are narrow, and there are very limited off street parking possibilities. In contrast, where I live now in Rainier Beach (on S. Ryan St.), the neighborhood density is much lower, streets are wider, most houses have garages, and off-street parking is readily available.

My proposal is to use an objectively measureable assessment of available off street parking to analyze parking availability. I believe the city already has something like this created. This assessment could then be used to create requirements for off street AADU/DADU parking that are tailored to the specific Seattle neighborhoods, or at an even finer scale, by specific street segments.

# **Appendix D: Email Comments**

**ADUEIS**

---

**From:** sarajane3h@comcast.net  
**Sent:** Monday, October 02, 2017 3:35 PM  
**To:** ADUEIS  
**Cc:** O'Brien, Mike  
**Subject:** Separate Mother-in-law legislation

I will attend the High Point hearing.

My #1 concern, as I testified before, is that the cost, complexity, impacts & affordability of a mother-in-law apartment are completely different from a backyard cottage. Therefore, they should be treated separately in legislation.

Mother-in-law apartments do not have sewer, structural, lot coverage, garden shade or tree removal problems. Except for off-street parking, all the complexities surrounding these units are related to backyard cottages, but not to mother-in-law apartments.

Mother-in-law apartments are naturally affordable as long as the home is homeowner-occupied, because the homeowner values a trustworthy tenant over maximizing rent. They can be greatly incentivised, as in Portland, by 1) forgiving the permitting fee, and 2) appointing one staff as navigator to simplify permitting, since each homeowner only does this once. That person should be accountable to a goal for producing more units and tracking their affordability.

Mother-in-law apartments typically cost 10% to 40% of the cost of backyard cottages. They are most often homeowner-funded by an equity loan. The large difference is another major factor leading to naturally affordable mother-in-law units, but a need to charge market-rate rents to recover costs for new backyard cottages.

Finally, please avoid using acronyms in community outreach regarding this legislation if you truly want to communicate with the public.

Sarajane Siegfriedt  
11811 33rd Ave. NE  
Seattle 98125

Sent from XFINITY Connect Mobile App

**ADUEIS**

---

**From:** Andrew Dempsey <Andrew.Dempsey@homestreet.com>  
**Sent:** Monday, October 02, 2017 4:51 PM  
**To:** ADUEIS  
**Subject:** ADUs

I would love to see you remove barriers to the building and construction of ADUs. Specifically I would love to see the following changes:

Parking square footage not included in the overall square footage limits  
Dropping the additional parking requirements  
Dropping the lifetime owner occupancy requirements and replacing with a 5 year ownership requirement.  
Limiting the back of lot and side of lot setbacks to just 2 feet for 1 story DADUs

These are just a couple of ideas that could help add some desperately needed affordable housing options.

***Andrew R. Dempsey***

Senior Loan Officer  
NMLS ID #698257

T: [206.389.4414](tel:206.389.4414)  
M: [206.660.2382](tel:206.660.2382)  
F: [206.621.2565](tel:206.621.2565)  
E: [andrew.dempsey@homestreet.com](mailto:andrew.dempsey@homestreet.com)  
W: <https://www.homestreet.com/person/andrew-dempsey>



There's no place like **[HomeStreet] Bank**

-----  
CONFIDENTIALITY NOTICE: The information in this message may be proprietary and/or confidential, and is intended only for the use of the individual(s) to whom this email is addressed. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this email and deleting this email from your computer. Nothing contained in this email or any attachment shall satisfy the requirements for contract formation or constitute an electronic signature.

## ADUEIS

---

**From:** Robert Kirby <kirby-bragg@comcast.net>  
**Sent:** Monday, October 02, 2017 4:56 PM  
**To:** ADUEIS  
**Subject:** ADU's

Dear Sir or Madam

I am in favor of ADU's. As a 68 year old 30 year resident in my current house, I have been thinking about the future when my wife and/or I might need some help with activities of daily living and how we might stay in our current house.

I can think of other situations that may favor such zoning changes as well.

The parking issue is the only potential problem I would question. In areas where parking is tight, and off street parking is not available, there should probably be some mitigation or limitation so that current residents are not hurt by any increase in density.

Best  
Robert Kirby  
6235 NE Princeton Way  
Seattle, WA 98115

**ADUEIS**

---

**From:** Sandra Wires <wires1@yahoo.com>  
**Sent:** Monday, October 02, 2017 5:43 PM  
**To:** ADUEIS  
**Subject:** Opinion on backyard cottages

Hi - I really do not like the idea, its going to make the neighborhoods higgledy piggedly if not slum-like in quality. Green areas and trees will be removed, more pavement and generally people are going to try to get as much rent as possible for even the smallest space which isn't going to help the homeless at all. What I want first and foremost is Housing First to Scale, get the homeless inside decent apartments for free, without having to give up all their addictions first. Most of them are untreated mentally ill and need services but first they need a roof over their heads. I feel most people in Seattle would donate huge amounts for such a solution as it will allow us to hold our heads high in that we are really helping the helpless. and it will show by getting the tents and garbage off the streets everywhere we go. I am sick of being broken hearted every time I drive into Seattle and see the sadness and sickness over and over and it looks like we don't care when its year after year! When are we going to put Housing First to Scale into effect?

Thank you!

Sandy Wires

**ADUEIS**

---

**From:** Thor Christensen <thorc@hotmail.com>  
**Sent:** Monday, October 02, 2017 8:38 PM  
**To:** ADUEIS

I'm writing to share my perspective about the proposed DADU legislation. My wife and I own a small (<1,000 sf) old house in Wedgwood that we currently rent to a nice family with young children. It has a large yard and a detached garage (usually used for storage). We would love to tear down the garage and build a DADU as an additional rental unit that could house another family at reasonable cost. But because we do not live at the property that is not an option, and while the proposed legislation makes progress in that direction it will not change our situation. Houses close by are selling for quite a good amount and are then torn down to make way for large new houses. Unless we can build a DADU on the lot in the next 5-10 years it is increasingly likely that the small old house will be torn down and the possibility of housing two families on the lot at reasonable cost will be gone. I do not think that removing the old house would improve Seattle, but that's what the economics will encourage us to do. I know some people worry that absentee owners will not maintain properties, but I can assure you that a lot with two rental houses would make up a significant amount of income for my family, and we would have every incentive to maintain it and keep tenants happy.

I hope you can take our situation into consideration, as I know there are many other people in the same position.

Thor

## ADUEIS

---

**From:** brett youngstrom <brett.youngstrom@gmail.com>  
**Sent:** Monday, October 02, 2017 9:18 PM  
**To:** ADUEIS  
**Subject:** Support for ADUs

Hi,

I am writing to express my support for the City's proposal to allow both an in-law apartment and a backyard cottage on the same lot, remove the existing off-street parking and owner-occupancy requirements.

Regards,  
Brett Youngstrom  
4525 Renton Ave S  
Seattle, WA 98108

## ADUEIS

---

**From:** Scott Amick <scott.amick@gmail.com>  
**Sent:** Tuesday, October 03, 2017 8:18 AM  
**To:** ADUEIS  
**Subject:** ADU EIS comment

I support the proposed changes to allow more housing to be built in the city with one exception noted below.

Changes are: allowing both an in-law apartment and a backyard cottage on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages.

The only change I would make is the parking space rule could be eased only at properties with fully built-out streets on both sides of their block (i.e. curb, gutter and sidewalk). I'm OK with parking being scarce but not when it means cars are blocking sidewalks or there are no sidewalks at all. This change to the rule should help focus sidewalk, curb and gutter investments on streets that really need them while striking a compromise with neighborhoods that have fully built streets and lots of development capacity without squeezing in towering full sized houses. SDOT, SDCI and OPCD need to coordinate efforts on this.

Thanks,  
Scott

Scott Amick  
206-914-4648

## ADUEIS

---

**From:** Jessica Clawson <jessica@mhseattle.com>  
**Sent:** Tuesday, October 03, 2017 8:38 AM  
**To:** ADUEIS  
**Subject:** EIS scoping comment

Please study:

- 1) The impacts of what would occur in the city if ADUs are not allowed—how many fewer units would be built, how much less affordable would the city become?
- 2) If there was an incentive to retain existing onsite houses or limit the size of existing onsite houses in order to build an ADU what would the impact be on “neighborhood character”? Would incentivizing ADUs/not demolishing existing houses and building huge single family mega houses lead to more density and a balance of neighborhood character? I’m thinking of the strategy in Melbourne where incentives are given for retaining existing structures.

Thank you!

Jessica M. Clawson  
Partner

[MCCULLOUGH HILL LEARY, PS](#)

701 FIFTH AVENUE, SUITE 6600

SEATTLE, WA 98104

TEL: 206.812.3388

DIRECT: 206.812.3378

FAX: 206.812.3389

[JCLAWSON@MHSEATTLE.COM](mailto:JCLAWSON@MHSEATTLE.COM)

[WWW.MHSEATTLE.COM](http://WWW.MHSEATTLE.COM)

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

**ADUEIS**

---

**From:** Julie Gaskill <julie5346@gmail.com>  
**Sent:** Tuesday, October 03, 2017 9:53 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Unit Proposal

Dear OPCD,

We believe allowing THREE dwellings or families on a single-family lot is a terrible idea for Seattle. It would cut down on bird and wildlife habitat, create noise, friction, parking difficulties and adversely affect the quality of life in our single-family neighborhoods.

The City's proposal would allow BOTH an in-law apartment and a backyard cottage. We think allowing ONE ADU is acceptable—that doubles density and brings the homeowner enough income to afford living here. But TWO ADUs on the same lot would destroy Seattle's unique single-family neighborhoods. Developers would take the three-family concept and run with it—creating high-end dwellings, even less breathable green space, and condemning two-thirds of the families on these lots to renting forever. It seems undemocratic to have a wealthy landowner renting out two spaces.

Better to cluster walkable villages around the Metro-link stations and on throughways like Aurora Ave, with high-rises and affordable condos so everyone who would like to, can afford a little piece of Seattle, instead of being able only to rent.

Allowing THREE families on a single lot would destroy Seattle's beautiful neighborhoods. Mayor Murray recommended this and there was a huge public outcry. Seattle does not want this!

Thank you,

Julie Gaskill and Richard Carter

**ADUEIS**

---

**From:** joel tufel <joeltufel@hotmail.com>  
**Sent:** Tuesday, October 03, 2017 11:27 AM  
**To:** ADUEIS  
**Subject:** Comments regarding ADU enlargement proposal.

I live in Maple Leaf.

Here our houses are closely spaced, often ten feet apart.

There is no privacy on these two sides.

Only the backyard can be private and often our bedrooms face that way.

In the back there can be natural space, light and vegetation, with access to a garden or recreational area.

This has always been the character of single family home ownership.

Our City Council has already removed the protection of this experience by allowing added housing structures in our backyards.

If my neighbors build two story 800 square foot buildings behind their homes, I too will be exposed to these new houses.

Then I will have lost all protection and privacy that I hoped for by investing in the biggest investment of my life.

There will be lights out there at night, sounds of music and television and conversations at times I may be trying to sleep.

In the summer with windows open by all, the opportunity for conflict and friction is obvious.

My sunlight may be blocked. Trees will be removed. View lines I chose when I bought my house will be blocked.

**I will have lost the benefits that motivated me to buy my house.**

**I would never have bought my house if there was another house in the next door yard.**

It is like a taking by government by eminent domain, my loss for the suggestion of a greater good benefit. But I see no good for myself or my neighborhood.

Maple Leaf is not a walkable community.

There is no close-by market here to shop for food.

It's all about managing our movement with cars.

Do you do all your food shopping by using public transit? Or bicycle?

Try that some time.

All I see with "backyard cottages" is diminished quality of life.

Crowding. Friction. Loss.

Cities will benefit from new designs for living

We might build differently for greater density and efficient use of space and energy.

But encouraging the development of second houses on our small lots is a recipe for loss and conflict.

Why not just require that no citizen can live in more than 800 square feet of residential space. Efficient use of available space will be achieved in this way too.

Keep the townhouses, condominiums and apartment buildings in the districts zoned for them. We had these discussions already and drew our overlay districts and zoning standards. This was our contract for ownership.

There are vast land areas that our Light Rail passes through that is where we need to turn for future development.

The Growth Management Act speaks about "**concurrency**", the idea that we grow within the urban growth boundaries in a way that enhances our lives, that does not ruin our quality of life.

**I see the trashing of our quality of life. I see loss. We are creating a big mess.**

Count this discussion as my vote to not further damage my neighborhood by relaxing our zoning codes any further.

Sincerely,  
Joel Tufel

## ADUEIS

---

**From:** Aaron <amlebeau@yahoo.com>  
**Sent:** Tuesday, October 03, 2017 1:30 PM  
**To:** ADUEIS  
**Subject:** DADU public comment

Aaron Lebeau  
12252 3rd Ave NW  
Seattle, WA 98177

I recommend the council consider lifting the garage space in coverage calculation or raising the total coverage of 800 sq ft. I think the allowable back yard garage coverage should be the same with or without the DADU. I do not see how a flat 800 sq ft garage has less of an impact to the environment than a 600 sq ft garage with 600 sq ft apartment above. The lot coverage would be less. I simply think the lot coverage and the same height restrictions of the main dwelling unit (house) make more sense.

Or at a minimum, I recommend raising the allowable total square feet to 1200 sq ft. A 600 sq ft garage is a 3 car garage and allows for 600 sq ft unit above, which is a comfortable sized 1 bedroom and would allow for one garage space to be used for the occupier of the DADU.

Thanks  
Aaron

Sent from my iPhone

**ADUEIS**

---

**From:** Sarah Lloyd <sarah.lloyd@curbed.com>  
**Sent:** Tuesday, October 03, 2017 3:45 PM  
**To:** ADUEIS  
**Cc:** Pennucci, Aly; Welch, Nicolas  
**Subject:** Re: Beginning the environmental review process for ADUs and backyard cottages

Hi Aly and Nicolas,

Pardon me for the 101 question here, I wasn't covering this issue when it first came up. Is the City plan the same as [O'Brien's plan last year](#)?

On Mon, Oct 2, 2017 at 12:42 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Good afternoon,

Today we announced the beginning of the [environmental review process](#) to study the potential effects of removing barriers to building accessory dwelling units (ADUs) in single-family zones. ADUs include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs). The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of the study, and we want your input on what to consider and analyze as we explore allowing more ADUs in Seattle's neighborhoods.

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The City's proposal involves allowing both an in-law apartment and a backyard cottage on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, we're preparing an EIS to review the potential environmental impacts of this proposal.

During the scoping phase, you can help us determine the alternatives we'll study, potential environmental impacts to consider, and possible measures to avoid or reduce the effects of the proposal. **Comments are due by 5:00 p.m. on November 1, 2017.** You can give us your input in several ways:

- **online** <http://www.seattle.gov/council/adu-eis>
- **by email** at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- **by mail** to Aly Pennucci, Council Central Staff, PO Box 34025, Seattle, WA 98124-4025
- **in person** at our two public scoping meetings
  - October 17, 2017, 6:00-7:30 p.m. at [High Point Community Center, 6920 34th Ave SW](#)
  - October 26, 2017, 6:00-7:30 p.m. at [Hale's Ales](#) (in the Palladium), [4301 Leary Way NW](#)

For more information, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).



**Aly Pennucci**, AICP | Legislative Analyst

City of Seattle | Council Central Staff | [206.684.8148](tel:206.684.8148)

PO Box 34025 | Seattle, WA | 98142-4025

--

**Sarah Lloyd** | Curbed Seattle Editor  
[seattle.curbed.com](http://seattle.curbed.com) | Twitter: [curbedseattle](https://twitter.com/curbedseattle)



Curbed is part of [Vox Media](#), home of [Vox.com](#),  
[The Verge](#), [SB Nation](#), [Polygon](#), [Eater](#), [Racked](#), and [Recode](#)

**ADUEIS**

---

**From:** stixrood@comcast.net  
**Sent:** Tuesday, October 03, 2017 5:32 PM  
**To:** ADUEIS  
**Cc:** Delaunay, Pete; Preston, Anne; Ron; McAleer, Colleen; Barbara; info@carymoonformayor.com; info@jennyforseattle.com; bryanhaworth@comcast.net; Kaplan, Martin; cleman@u.oo.net  
**Subject:** Scoping Comments Accessory Dwelling Units EIS

The current proposal presentation of two fixed alternatives may not meet the intent of the State Environmental Policy Act to identify the objective to be achieved and to compare the impacts associated with alternative ways of achieving housing objectives.

The concern expressed in this comment is that the proposal and alternatives as described on the City website may not fully comply with State Environmental Policy Act (SEPA) guidelines. Complying more fully with SEPA could allow solutions to be tailored to individual neighborhoods and increase public acceptance and understanding of the proposal, particularly in neighborhoods concerned with protection of single family character. My comment does not reflect any position on the City alternatives; the EIS process is intended to provide the information needed for an informed decision. My comments are intended to improve the process of informed decision making as is the intent of SEPA.

*WAC 197-11-060 (3) states (iii) **Proposals should be described in ways that encourage considering and comparing alternatives.** Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions. A proposal could be described, for example, as "reducing flood damage and achieving better flood control by one or a combination of the following means: Building a new dam; maintenance dredging; use of shoreline and land use controls; purchase of floodprone areas; or relocation assistance."*

The guidance in this WAC can apply directly to the wording of the current proposal by the City, and increase compliance, if the proposal were described as "increase the total supply of housing units and number of affordable and family oriented housing units". Individual actions in the proposed legislation then become the alternative ways of achieving housing objectives.

Alternatives would include (as stated in City proposed legislation)

1. Allow an ADU and DADU on a single family lot
2. No off street parking required for ADU or DADU
3. No owner occupant requirement
4. 3200 minimum lot size requirement for a DADU
5. Increase DADU allowed square footage to 1,000 sf.
6. Allow 1-3 foot increase in height.
7. Increase rear lot coverage for a DADU from 40 to 60 percent.
8. Allow DADU entrances on side and rear lot lines if they are 10 feet from the lot line.
9. Allow projections for dormers.
10. Increase the number of people allowed to be living on a single family lot from 8-12.

Some alternatives might be grouped to create a tiered approach typical in land use EIS analysis. For example measures forecast to create many units, measures forecast to have limited effect on housing supply but which might mitigate impacts; etc.

Analysis of each measure could include the number of housing units expected to result in various socioeconomic categories as well as potential impacts in the areas of the environment such as parking, traffic, public services, land use and aesthetics. This approach could create impact/benefit information which would help identify which measures create the most housing with the least impacts.

The comment I hear frequently from neighbors is a concern over erosion of character and quality of life in single family areas. This concern could easily be addressed by rewording the proposal and alternatives to the manner suggested by SEPA guidelines.

Another comment I have heard very strongly from neighbors is that a "one size fits all" approach may not be appropriate. If alternatives are mixed and matched to individual neighborhoods, this concern is addressed. For example, it is easy to see that not requiring on-site parking may work well in some neighborhoods with wide streets and access to transit and not so well in others with narrow streets and steep slopes. As an example of how mitigation measures might be developed to address these types of concerns, a policy to expand the neighborhood parking permit program as part of the reduction in parking requirement might increase acceptance.

Thank you for considering my comments, I remain a strong supporter of increasing the development of ADU's and DADU's as a cost effective and expedient way to address our current housing crisis and believe that if measures were selected on a neighborhood basis with community participation to meet density goals, the proposal acceptance and success would be high.

Carl Stixrood  
2510 Boyer Avenue East  
Seattle, WA

## ADUEIS

---

**From:** Tom Marshall <tomasaurus@gmail.com>  
**Sent:** Tuesday, October 03, 2017 5:54 PM  
**To:** ADUEIS  
**Subject:** Support for Accessory Dwelling Units proposed change

I support the proposed changes for Accessory Dwelling Units. The city needs more density and it should be affordable. Fewer regulations will help us get more affordability.

Thanks,  
Tom Marshall  
5008 39th Ave S  
Seattle 98118

**ADUEIS**

---

**From:** Martha Barkman <mbarkman@mackurban.com>  
**Sent:** Tuesday, October 03, 2017 6:13 PM  
**To:** Jessica Clawson; ADUEIS  
**Subject:** RE: Melbourne incentive

Hi Nick – Australia has a shockingly light land use code so there are good and bad consequences that arise out of their “hands off” approach, but they are even more possessive than Seattle on holding onto SF homeownership – so to handle all the growth they are allowing 70+ story condos downtown and rezoning much of the industrial lands to housing/commercial instead.

Both Melbourne and Sydney allow “outright” a second home on your SF lot (that’s their way of not rezoning SF) the homeowners then rent out the other unit – there were quickly complaints that neighborhoods were losing their “backyards” so now they are implementing new land use standards on how big the footprint of the second structure can be. Below isn’t a good picture but you can see the new modern ADU behind the 100 year old “heritage” house in front.



Regarding the retail, what they actually did was not a bonus but the “upzones” in some areas are happening a half block off the main retail streets (see below). This keeps the charming older buildings that the neighborhood loves but also provides cheap rent and character for the retailers. The retail was mostly mom and pop but very healthy. In the half block behind they rezoned to 6 to 8 storeys for new “middle ring” multifamily ---- this seemed like a really cool way for

Seattle to preserve its neighborhood pedestrian/retail cores and yet still get the denser housing in there too ---- of course more SF has to go as a result but the saving of the character buildings in front seemed to be a good tradeoff.....happy to chat if you want more detail.



**MARTHA BARKMAN**  
Vice President of Development

1411 4th Ave, Suite 500  
Seattle, WA 98101  
T 206 753 2414  
C 206 793 2121  
F 206 623 8232  
[mbarkman@mackurban.com](mailto:mbarkman@mackurban.com)



The information in this message is confidential and subject to the terms of our electronic communication policy. Please see the link below for more info:  
[E-Mail Privacy/Confidentiality Notice](#)

---

**From:** Jessica Clawson [mailto:[jessica@mhseattle.com](mailto:jessica@mhseattle.com)]  
**Sent:** Tuesday, October 03, 2017 1:36 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Cc:** Martha Barkman <[mbarkman@mackurban.com](mailto:mbarkman@mackurban.com)>  
**Subject:** RE: Melbourne incentive

Hi nick!

The Runstad fellows went there this year (I am not a fellow so I did not get a free trip to Australia, sad), and that's how I learned about it. They do it more for commercial development but essentially the developer gets a density bonus for building behind the old commercial buildings and retaining the old commercial buildings—this also helps with commercial affordability. I'm copying Martha Barkman who was a fellow and was telling me about this—she might be able to help with more information about the incentives and the program there.

On DADUs/ADUs, I thought the same idea could be applicable to help retain “neighborhood character.” I live in Magnolia where every little house is being demolished to build a mega house. I'm obviously not against development and change is a constant, but it's a shame that only one family can live on the lot in the huge mega house. What if the right to build a DADU was tied to keeping the old house in place or at least restricting the size of the “front house” to the same or similar size/footprint as the original? It could be a good for density, affordability, and neighborhood character/size issues.

Jessica M. Clawson  
Partner

[McCULLOUGH HILL LEARY, PS](#)

701 FIFTH AVENUE, SUITE 6600  
SEATTLE, WA 98104  
TEL: 206.812.3388  
DIRECT: 206.812.3378  
FAX: 206.812.3389  
[jclawson@mhseattle.com](mailto:jclawson@mhseattle.com)  
[www.mhseattle.com](http://www.mhseattle.com)

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

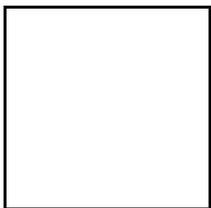
---

**From:** ADUEIS [<mailto:ADUEIS@seattle.gov>]  
**Sent:** Tuesday, October 03, 2017 1:23 PM  
**To:** Jessica Clawson <[jessica@mhseattle.com](mailto:jessica@mhseattle.com)>  
**Subject:** Melbourne incentive

Jessie,

I'd like to learn more about the Melbourne incentives to retain existing structures that you mentioned. Can you point me to information about it?

Thanks for bringing it up. Your suggestions are super helpful.



Nick Welch  
Senior Planner  
City of Seattle, [Office of Planning and Community Development](#)

O: 206.684.8203 | F: 206.233.7883

[Facebook](#) | [Twitter](#)

## ADUEIS

---

**From:** Victoria N. McCormick <homelessgrouch007@gmail.com>  
**Sent:** Tuesday, October 03, 2017 7:54 PM  
**To:** ADUEIS  
**Subject:** RE: Accessory Dwelling Units

Thank you!

On Oct 3, 2017 5:26 PM, "ADUEIS" <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Victoria N. McCormick [mailto:[homelessgrouch007@gmail.com](mailto:homelessgrouch007@gmail.com)]  
**Sent:** Monday, October 02, 2017 8:48 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Accessory Dwelling Units

Dear Administrator:

Please note that without the missing middle component numerous people would be homeless! Including me. Retrofitting a garage into a living space made so that I was Not a burden on society. Please realize that this warrents consideration for which is doable with your help. I throughly believe that you are part of the problem or you are part of the solution!

Do you know how to save a life?

Cordially,

Accessory Unit Dweller

VMC

## ADUEIS

---

**From:** John Schlosser <John.Schlosser@sgsi.com>  
**Sent:** Wednesday, October 04, 2017 5:25 AM  
**To:** ADUEIS  
**Subject:** ADO Proposed changes-Scoping

In the EIS pls incl analysis of following issues:

1. Net increase in units:

The what extent will each proposed ADU alternative \*divert\* demand to SF zones from areas already zoned for MF housing.

le, ADU changes may \*not result in significant incremental expansion of housing supply, rather soak up demand otherwise supplied by development in MF zones areas. Critics of HALA proposals, incl the ADU changes, suggest that existing zoning capacity is sufficient, and that measures like ADU zone liberalization, will not have the desired effect.

2. Owner-occupancy:

The likely nbr of SF-zones properties that will flip from owner-occupied to renter-occupied—if new ADU rules allow ADU's with no owner-occupied covenant. It is hard to overstate the impact of owner-occupancy on neighborhood character.

3. Which ADU change is most impactful?

The extent to which \*each\* separate element of AD-related zoning change contributed to increased supply of ADU's. The proposed alternatives include a bundle of changes, each with potential positive impacts (incl units) and negative impacts (utility/services/parking capacity, etc). In addition, of course, there are ADU policy alternatives related to ADU's but not strictly zoning.

Eg.,

A. (Non-zoning): Reducing sewer connection and City Light connection fees; reducing Building Department ADU license/permit fee; building code changes.

B. Reducing parking requirements.

C. Allowing 2 ADU's if one is detached, 1 non-detached & Main is owner-occupied.

D. Allowing non-owner occupancy.

Etc.

The point is, the EIS van and should analyze \*which\* specific changes are more powerful (or necessary) in obtaining the desired effect.

Maybe doing A and B (above) would be most impactful, or A and C or?

4. Timing:

Today's high rents/prices are unarguably driven by a \*sudden increase in demand (cf Amazon and tech etc). Housing production has taken a while to catch up. This is normal.

But supply \*is catching up: eg., real estate industry reports move-in incentives dbl over past year. As 10,000's of new units become available ... and Amazon builds HQ2 elsewhere ...this supply-demand mismatch will resolve naturally — perhaps even without ADU zoning change.

Bottom line: The analysis of incremental ADU units should be based on \*average\* or equilibrium housing market conditions—\*not current high-heat conditions. Zoning law will stay on the books indefinitely so must be helpful long term—during recessions as well as boom times. Please insist your EIS consultant consider this in their analysis.

Thanks,  
John Schlosser

**ADUEIS**

---

**From:** John McAlpine <johnm@paceengrs.com>  
**Sent:** Wednesday, October 04, 2017 9:02 AM  
**To:** ADUEIS  
**Subject:** RE: Comments about ADU's

One more item.... I just added this to the October 2, 2017 West Seattle blog article about DADU's.

*@WS Guy.... I agree too. I built a DADU about 3 years ago. I live in the DADU and rent out my house. I share my yard with the renters and interact with them daily. Of course I'm not going to pick the first person through the door. I interview every possible tenant. I want to make sure I get along with them. I don't believe the City understands this. It's different for the landlord that actually lives on the same lot with the renter....and actually interacts with the renter. I have a wonderful young couple living there now and I couldn't be happier. My rent is below the asking price elsewhere, because I want to help, but also because I want to pick who I want to share my life with. Again....the City, I feel, is disconnected from this.*

---

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Tuesday, October 03, 2017 5:27 PM  
**To:** John McAlpine <johnm@paceengrs.com>  
**Subject:** RE: Comments about ADU's

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** John McAlpine [mailto:johnm@paceengrs.com]  
**Sent:** Tuesday, October 03, 2017 8:10 AM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** Comments about ADU's

Good Morning,

I'm happy to see the City is relooking at the requirements for backyard cottages. I originally built one in the backyard of my sister's home for our mom to move into. I was so pleased with the outcome that I built one in my backyard.

Here's what upset me. When I was all done with the project I received a letter stating I need to pay \$15,000 (I believe) for a sewage fee connection. I found that to be absurd. It's a small cottage for one person. The most current edition of the Washington State Department of Ecology Criteria for Sewage Works Design Table G2-2: Design Basis for New Sewage Works states the average person per dwelling uses 100 gallons of water per day.

<https://fortress.wa.gov/ecy/publications/documents/9837.pdf>. I rent my main house and live in the cottage. I've had up to 6 people living in the rental house. That's a lot of wastewater entering the system (600 gpd). I currently have 4 people living in the house (400 gpd). I live in the cottage at 100 gpd, per DOE. What I'm getting at is the cottages use a fraction of the water the main house uses. A \$15,000 connection fee is grossly high. I could add 5 bathrooms to my main house and no additional fees will be requested.....but I add the cottage fixtures and it's \$15,000. I hope I'm making this somewhat clear? I'm not the most articulate person.

Please revisit the connection fee for these small dwelling units.

Sincerely,

John

## ADUEIS

---

**From:** Marisa Wallace <iliveinthewater@gmail.com>  
**Sent:** Wednesday, October 04, 2017 10:49 AM  
**To:** ADUEIS  
**Subject:** AUD support

To Whom it May Concern,

I would like to lend my support and full encouragement of the proposed expansion and approval of AUD's in Seattle.

This is important work.

Best,

Marisa Wallace  
Seattle, WA

## ADUEIS

---

**From:** chuck flaherty <cherrilaneco@yahoo.com>  
**Sent:** Wednesday, October 04, 2017 11:14 AM  
**To:** ADUEIS  
**Subject:** ADU

Seattle City Council,

It is an admirable idea to allow more separate living units in all parts of the city and I do support that concept. My only concern is that we don't end up allowing too much lot coverage and lose too much natural vegetation, i.e., trees and shrubs. The city seems to be doing reasonably well at encouraging new and preserving established canopy throughout the city and we need to make sure this is applied in any ADU rules or regulations.

Thank you.

**Chuck Flaherty**

Magnolia Garden Center  
3213 W. Smith St., Seattle WA 98199  
206 284-1161 fax 206 284-0081

## ADUEIS

---

**From:** Jim Ives <jives@metzlerna.com>  
**Sent:** Wednesday, October 04, 2017 11:18 AM  
**To:** ADUEIS  
**Cc:** Barb Ives  
**Subject:** Don't do it!!!

Adding housing units without requiring off-street parking is a huge mistake. 'Mike O'Brien's Ballard' is now musical chairs in finding off-street parking in these new dense O'Brien neighborhoods. It is HIDEOUS!! Just say no. Plus there is NO guarantee that these units will be rented so median wage-earners can afford. **Just say no!!!**

**Jim Ives**

**[METZLER](#)**

700 Fifth Avenue, 61st Floor  
Seattle, WA 98104  
206-224-3905  
206-224-3935 fax  
[www.metzlerna.com](http://www.metzlerna.com)

## ADUEIS

---

**From:** Carol Hiltner <carol.hiltner@gmail.com>  
**Sent:** Wednesday, October 04, 2017 11:35 AM  
**To:** ADUEIS  
**Subject:** topics to consider

parking  
indoor air quality when the ADU shares a ventilation system with the main dwelling

**ADUEIS**

---

**From:** Daiga Galins <Daiga.Galins@lakesideschool.org>  
**Sent:** Wednesday, October 04, 2017 11:50 AM  
**To:** ADUEIS  
**Subject:** ADU's and traffic/parking

Dear City Council members and fellow citizens,

Please, please be mindful of the incredible traffic and parking messes that will result from denser housing. We all know that traffic is already unbearable on most arterials, but it's also becoming increasingly so on small neighborhood streets. It can take inordinate amounts of time, for example, to turn from a small neighborhood street onto a modest-size arterial because of the volume of cars flowing (or crawling) along the arterial. Small neighborhood streets are becoming increasingly unsafe as cars race through to avoid lights or try to find faster routes when arterials are blocked. As was reported in the Seattle Times not long ago, most who move here are not coming carless. We're naïve to think so. The vast majority come with cars, and those cars have to be parked somewhere. Those cars are used for commuting and travel, and they are choking our streets.

The city's recent bike share programs appear successful (during the dry and sunny summer months, anyway), but as an avid cyclist, I'm willing to bet that ridership goes way down once the rain hits and the days grown short and dark. And that means more traffic.

Please don't be naïve about traffic and parking impact when considering ADU's and other density planning.

Thank you,  
Daiga Galins

**ADUEIS**

---

**From:** Alice Wesley <alicebjoem@gmail.com>  
**Sent:** Wednesday, October 04, 2017 11:59 AM  
**To:** ADUEIS  
**Subject:** Support for adding more housing on "single family" lots

I live in an apartment building with some 300 senior residents. We're nice people, very responsible citizens and good neighbors. There's really no good reason for people on "single family" lots to be so leery of us.

When it is so hard for even single young people to afford rent near their work in our city, not to mention young families with children, it seems to me extremely snooty and unkind to use government regulations to keep these people out of "single family" zones. I strongly support allowing property owners in all zones to build one or two additional dwellings on their lot.

Is parking a problem? Well, let the Council permit the construction of one parking building per residential block.

Alice Blair Wesley  
725 Ninth Avenue # 103  
Seattle 98104  
206.407.1782

**ADUEIS**

---

**From:** Linda Purdy <purplady@hotmail.com>  
**Sent:** Wednesday, October 04, 2017 12:04 PM  
**To:** ADUEIS  
**Subject:** ADU budget

Thank you for the opportunity to give input this way. I see 3 issues related to Seattle housing.

1. There needs to be safe, temporary housing for the many on the street. Something that is easy to put together, maintain and move. Something like the ADUs on PalletShelter.com. These are being used by FEMA and I think they are a local company with a great mission.

2. The money that is being given to the city from building developers needs to be used for permanent low income buildings with housing. Something like what Plymouth housing has done only more so. The mistake the city has made is giving developers an easy way out. They should either pay more or build lower income housing in the buildings. It doesn't need to be for the poorest even. The middle income people can't afford the city anymore either. Or those working 1 - 2 minimum wage jobs.

3. The current idea of ADUs in back yards or neighborhoods may help some but they should not completely change the character of the neighborhood. These may also give middle income people an option. They will help the least amount of people out of these 3 ideas.

I hope this input helps.

Get [Outlook for Android](#)

## ADUEIS

---

**From:** Mary Kollar <mary@ajkollar.com>  
**Sent:** Wednesday, October 04, 2017 12:25 PM  
**To:** ADUEIS  
**Subject:** Adu

I live in the most historic neighborhood on Capitol Hill. I oppose ADU's. Already this hill has been stripped of any aesthetic historical charm by boxes of ugly cheap construction within yards of mansions that once belonged to the founders of our city. Soon our city will have all the charm of what the Soviets built in Warsaw Mary Kollar

Sent from my iPhone

**ADUEIS**

---

**From:** rpence@cablespeed.com  
**Sent:** Wednesday, October 04, 2017 2:21 PM  
**To:** Pennucci, Aly  
**Subject:** Fwd: Fwd: Supporting Backyard Cottages

Hi Aly,

Thanks for getting back to me on this matter. Below are my thoughts from last year, forwarded as per our phone conversation.

-Roger Pence-

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

From: rpence@cablespeed.com  
 To: Rob Johnson <Rob.Johnson@seattle.gov>  
 Sent: Mon, 09 May 2016 03:20:01 -0400 (EDT)  
 Subject: Fwd: Supporting Backyard Cottages

Hi Rob, since you are the Land Use chair now, I should've included you in this original message.

Cheers

-Roger-

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

From: rpence@cablespeed.com  
 To: Nicolas Welch <nicolas.welch@seattle.gov>, Mike O'Brien <Mike.O'Brien@seattle.gov>  
 Cc: Diane Sugimura <diane.sugimura@seattle.gov>  
 Sent: Thu, 05 May 2016 21:23:12 -0400 (EDT)  
 Subject: Supporting Backyard Cottages

Hi Mike and Nick,

First, thanks for the two great public meetings last winter. Nick, your presentations were excellent, covering all the relevant issues in an open and friendly way. And Mike, you added your part in an equally engaging manner. You both made it very clear you were there to listen and learn, and not just to sell something. Gold stars for each of you!

What I especially appreciated was the decision to do the Q&A in the open. It was healthy for skeptics to hear the conversation about how we can get more backyard cottages with minimal negative impacts. It's hard for people to stand opposed to something when they hear their concerns being discussed in such an open and candid manner -- and when they hear their neighbors and others like themselves buying into the program. Much more effective than the "control" mode often used, where citizens are divided up into separate discussion tables after a presentation.

Now to the substance of my comments. I'm trying to balance interests here -- code changes that should result in more cottages, but in ways that people don't find disruptive or undesirable. My judgement is influenced strongly

by the positive vibes I was getting at your public meetings, and also by the chatter I engage in online and with neighborhood friends. Do it right, and we can put good code changes in place with minimal pushback.

#### OWNER OCCUPANCY REQUIREMENT

Backyard cottages arose as a tool homeowners could use to generate additional income to offset increased property taxes and other living costs. While cottages also increase housing supply, people view that as a secondary result. So it's important to keep the requirement that the homeowner lives on the property, at least for a period of years after construction.

But as the discussion showed at the meetings, people's circumstances change over time. I believe it would be entirely reasonable that after a period of perhaps five years, an owner be allowed to rent out both units. But when that owner sells the property, the owner-occupancy requirement should return for another five-year period. The reason being that the City wants to support a stable base of owner-occupied houses in non-transitional SF neighborhoods. I don't think we want investors buying up such properties to turn solid and traditional SF neighborhoods into rental neighborhoods. There should be enough room for investor rental housing in LR and NC zones.

I would loosen up a bit on the definition of ownership interest. A parent or child of the owner could reside in one unit and fulfill the owner-occupancy requirement. I think the intent of the restriction is to prevent the property from becoming just another parcel in an investor's real estate portfolio. Allowing residence of other family members fulfills that intent.

#### OFF-STREET PARKING REQUIREMENT

Yes, remove the requirement, for all the obvious reasons. Most SF neighborhoods where cottages would be built have plenty of on-street parking available. The only area where this could be a problem would be in SF neighborhoods close to activity centers and major institutions, such as areas where Residential Parking Zones are in place. If the decision is made to keep a parking requirement, it should be applied only in those areas where parking is tight.

#### ALLOWING BOTH ADU AND DADU ON SAME PARCEL

I suggest allowing one of each, at least on larger lots. Given the costs involved in building these units, I expect few homeowners would be building both. It shouldn't be a big issue.

#### MINIMUM LOT SIZE / YARD COVERAGE

The real issue isn't lot size, it's the size of the back yard. Better to set a minimum back yard size and ignore total lot size. Whether a home has a small or large front yard should be immaterial to allowing a cottage in the back yard. If the back yard is large enough and has legal access, that should be sufficient.

Also, increase maximum yard coverage for back yards, perhaps up to 50-55 percent. Or consider allowing a minimum 4-500 SF unit in a qualified back yard, that meets all setback requirements, even if that would exceed the maximum yard coverage.

I would also remove the overall lot coverage maximums. Again, the operative issue is the size and coverage of the back yard. The rest of the lot should be immaterial.

#### GROSS FLOOR AREA

With all the interest in tiny houses, micro apartments (apodments) etc., it's hard to make a case for significant increases in allowed floor areas for cottages. These are auxiliary units, not primary houses. I grew up in a 3-bedroom post-war house with all of 864 SF. We lived just fine. It's quite possible to design and build a 2-bedroom cottage within the existing 800 SF, but if you have to increase maximum cottage size, limit it at 900 SF. The larger these cottages get, the more they begin to look like main houses and the greater the potential for blowback.

#### COTTAGE HEIGHT MAXIMUMS

I can't grasp the rational behind variable height limits based on lot widths. Set height limits for typical 1-1/2 story cottages (with roofs pitched at say 3 in 12) at about 22 feet regardless of lot or yard size. If surrounding houses (main house and neighbor houses within a 50-foot radius of the cottage) are 30 feet or taller, allow cottages to be built up to 4 feet shorter than the tallest of the neighboring houses. This allows some design flexibility and still keeps the cottages appropriately scaled.

#### CONVERSION OF EXISTING GARAGES

Allow conversion of existing garages regardless of non-conforming setbacks. Allow walls on non-conforming setback to rise vertically. If the garage space is uninsulated and unheated and the unit has a functioning garage door (i.e. it's useable to park an automobile), then do not count that space as part of the cottage size.

-----

I'm happy to discuss these issues with you further, if that would be helpful. As the mayor has noted, the "numbers just aren't there" for significant housing increases in SF neighborhoods, but these changes would allow some increase without significantly changing the character of SF neighborhoods. I've been around a long time, and I believe that the above changes would be acceptable politically.

But you do need to re-run those two meetings when you've got a proposal ready to send to council. Show folks that you heard them, explain how your proposal responds to their issues, and why the changes won't lead to bad results. I expect most of the feedback will be positive, and who knows, new ideas could still emerge that might improve the legislation.

Cheers

-Roger Pence-  
(206) 718-5465

## ADUEIS

---

**From:** kkildall <kk@uw.edu>  
**Sent:** Wednesday, October 04, 2017 2:40 PM  
**To:** ADUEIS  
**Subject:** Comments

Hello,

I am a Wallingford resident and I am excited about the potential for changes in regulations regarding ADUs. Here are my reasons:

- inexpensive way to increase density
- maintains character of neighborhoods
- increases ability of low and middle income renters to stay in the city
- increases ability of low and middle income owners to stay in the city with additional income
- activates underused and sometime unsafe alleys

Concerns:

- People are often worried about parking in this neighborhood. Most people currently do not use their off street parking, so there would be little impact.
- Infrastructure is ill-equipped in handling increased population: I would like to see investment in bike lanes, pedestrian crossings, open space and community spaces.

Kristin Kildall

## ADUEIS

---

**From:** Linda Schwartz <lbschw@gmail.com>  
**Sent:** Wednesday, October 04, 2017 6:11 PM  
**To:** ADUEIS  
**Subject:** comments on how to encourage more ADUs

Hello,

We have an ADU already and have been quite unhappy with the whole RRIO registration fees, inspection fees and inspection process. The first thing you might consider is making these kinds of units exempt from participation in the RRIO - we are not the slumlords the RRIO program needs to crack down on!!! We have the unit in our home and, as a result, like to keep a good tenant when we find one. We've kept our rents below market rate for the past 7-8 years to ensure this but the RRIO process is making me want to convert the space back into something we'd use for ourselves and be DONE with the City!

--

Linda Schwartz  
1132 NW 64th St  
Seattle, WA 98107

## ADUEIS

---

**From:** Linda Schwartz <lbschw@gmail.com>  
**Sent:** Wednesday, October 04, 2017 6:11 PM  
**To:** ADUEIS  
**Subject:** comments on how to encourage more ADUs

Hello,

We have an ADU already and have been quite unhappy with the whole RRIO registration fees, inspection fees and inspection process. The first thing you might consider is making these kinds of units exempt from participation in the RRIO - we are not the slumlords the RRIO program needs to crack down on!!! We have the unit in our home and, as a result, like to keep a good tenant when we find one. We've kept our rents below market rate for the past 7-8 years to ensure this but the RRIO process is making me want to convert the space back into something we'd use for ourselves and be DONE with the City!

--

Linda Schwartz  
1132 NW 64th St  
Seattle, WA 98107

**ADUEIS**

---

**From:** Jodi Williams <jodiwms@comcast.net>  
**Sent:** Wednesday, October 04, 2017 6:31 PM  
**To:** ADUEIS  
**Subject:** RE: Neighbor already does this...

Thank you for the info. I truly appreciate it.

Tried the link but says they have a high volume of inquiries and can't take anymore...

I'll see about calling them later this week.

Appreciate the help.

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

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Wednesday, October 04, 2017 12:02 PM  
**To:** jodi a williams <jodiwms@comcast.net>  
**Subject:** RE: Neighbor already does this...

Hi Jodi -

The type of land use/activity permitted on a property is specific to the current and historic zoning for that property so the specific address is needed to determine if a three unit building is a permitted use at that location and if it was established lawfully. The Seattle Department of Construction and Inspection is the best source for that information - you can submit a specific question online at: <http://web6.seattle.gov/dpd/LUQnA/?Type=1>, or you can call them at (206) 684-8850. You could also visit the applicant services center (see details below).

Visit the Applicant Services Center  
700 5th Avenue, 20th Floor  
M, W, F: 8:00 a.m. - 4:00 p.m.  
T, Th: 10:30 a.m. - 4:00 p.m.  
(arrive before 2:00 p.m. for walk-in service)

Best,  
Aly Pennucci, Council Central Staff

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

**From:** jodi a williams [mailto:jodiwms@comcast.net]  
**Sent:** Tuesday, October 03, 2017 5:16 PM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** Neighbor already does this...

My neighbor already has her three story house divided into three separate units. Does this mean she is illegally doing this? I've always wondered but couldn't track down how to find out. She is also now running a business out of her carport as well. It's a pain... Especially for parking.

Please advise. Thank you.

**ADUEIS**

---

**From:** phrenophred <phrenophred@gmail.com>  
**Sent:** Wednesday, October 04, 2017 8:04 PM  
**To:** ADUEIS  
**Subject:** Feedback on proposal.

While I am sympathetic to the general goals of this proposal, it goes too far, and does not include some basic safeguards to ensure the coherence and integrity of Seattle's neighborhoods.

Specifically, there are significant issues with removing the owner occupancy requirement. As far as I can tell, the only function of removing this is to open up single-family zoning to duplex and triplex development (albeit under a softer, gentler, but nonetheless deceptive guise). If that is the intention of this proposal, be explicit and deal with the issue head on.

All of the reasons given for making ADU and DADU development easier include the implied the presence of an owner. For example: retired individual or couple (or young family) wants to make additional income off rent. Family/couple/adult child wants to create space for aging parents, or young families. Family/couple/individual wants to create housing for displaced/homeless (as in Portland).

Maintaining the owner occupancy requirement helps ensure (in most cases) a connection to and responsibility for the neighborhood. Such a connection could go a LONG WAY in helping to prevent some of more egregious development. Without this connection, you are potentially destroy the Integrity of many neighborhoods. Just look at Ballard.

Given how much this proposal is looking to ease building requirements in terms of height, square footage, massing, and lot coverage, maintaining this owner occupancy requirement as is seems all the more necessary. That is, unless the city doesn't mind creating neighborhoods full of absentee landlords, and lots that are now bursting at the seams and perhaps even without occupancy at all. Think international investment patterns and the Vancouver problem!

While I have some concerns about removing the parking requirement, they are secondary to the owner occupancy requirement. Further, I believe potential problems could be addressed if the city instituted zone parking in all areas where these Adu Dadu restrictions are eased. Instituting zoned parking might also go a long way in addressing some of the parking concerns already existing in neighborhoods experiencing rapid high-rise development. Especially if the zone parking is allotted in ways that reflect the use and intent of that development.

For example, the efficiency apartments that are being developed with the assumption that only a small number of residents have a car receive only a small number of zone parking permits. Other permits can be obtained but they must be purchased by the residents at a fairly steep price. Similarly for single zone housing. The city can allot a limited number of parking permits per house, that might be one or it might be two. but whatever that limit is, it should be maintained even if a house has DADA or ADU development. If more street parking is needed, then the residence of said development can purchase it at a fairly steep price.

Thank you for considering my feedback.

Erica Lilleleht  
Greenwood

**ADUEIS**

---

**From:** Alice & Joe Wesley <alicebjoem@gmail.com>  
**Sent:** Wednesday, October 04, 2017 10:48 PM  
**To:** ADUEIS  
**Subject:** Support for adding more housing on "single family" lots

I live in an apartment building with some 300 senior residents. We're nice people, very responsible citizens and good neighbors. There's really no good reason for people on "single family" lots to be so leery of us.

When it is so hard for even single young people to afford rent near their work in our city, not to mention young families with children, it seems to me extremely snooty and unkind to use government regulations to keep these people out of "single family" zones. I strongly support allowing property owners in all zones to build one or two additional dwellings on their lot.

Is parking a problem? Well, let the Council permit the construction of one parking building per residential block.

Alice Blair Wesley  
725 Ninth Avenue # 103  
Seattle 98104  
[206.407.1782](tel:206.407.1782)

**ADUEIS**

---

**From:** wmethner@yahoo.com  
**Sent:** Thursday, October 05, 2017 8:01 AM  
**To:** ADUEIS  
**Subject:** Housing

With respect to all

Although I appreciate the efforts to provide housing for lower income people what are you doing to enable senior citizens to stay in their homes that they have worked all their lives to own and maintain.

My spouse and I recently retired and are now on a fixed income. We both worked in support services for health care for 30 plus years. We were not doctors or nurses so our income and future resources are not even middle class income but not low enough to qualify for assistance. We have worked hard all these years to afford and maintain our house that we bought in 1993.

At the rate that property taxes are increasing we will be taxed out of our house. Already our property taxes are almost more than our mortgage. We have to have a car because the closest bus stop is more than a mile away. When we rented a shelter at Greenlake for a club event, we couldn't use the shelter because the homeless people said it was their home.

So do you think I support higher property taxes, higher transportation fees and taxes, more fees for parks... More taxes for city funded drug den housing.... Hell NO!

With respect

Wayne W. Methner

Sent from my iPad

Wayne W Methner  
17850 28th Ave NE  
Lake Forest Park, WA 98155  
C: 206-234-5724  
wmethner@ yahoo.com

**ADUEIS**

---

**From:** Beth Pearson <BethP@kcha.org>  
**Sent:** Thursday, October 05, 2017 8:17 AM  
**To:** ADUEIS  
**Cc:** 'ehl.michael@yahoo.com'  
**Subject:** ADUs in Seattle Neighbors

Hi –  
I'm a big supporter of making ADUs more feasible in Wallingford. I think it will help increase low income residents and also preserve the neighborhood character.

Pros:

- encourage residential density where we need and want it/avoid sprawl
- allow homeowners to make money from their property, rather than having to sell to developers. ADUs will allow low & moderate income people to stay in expensive neighborhoods, much like AirBnB. (I do think we should consider somehow 'marketing' this to Seattlites; maybe homeowners could be incentivized to lease to lower income people, like young couples, single moms, the elderly or disabled?)
- it could bring people of various income levels together. If we can house lower income people among us, we will reduce prejudice and fear, and help support of culture of community and reaching out.

Cons:

- parking, of course. I'm all for regulating this use, as needed. Lots of older folks have retired or have kids that have left the nest. They use one (or no) car and adding an ADU and additional car would be a neutral impact. Having an ADU should be a privilege and ones that create parking problems should be restricted.
- Usual noise and other nuisance laws need to be enforced. I'd rather have an ADU in my neighbor's backyard than chickens (which are on 3 sides of me now!)
- Landlords renting out an ADU should be required to maintain health, safety and other standards, be responsible for the enforcing their lease, carrying insurance, etc. So, this may have to be a licensed use. If so, we need to try to keep the bureaucracy minimized; people will ignore the law if it's hard to understand and follow.

Thanks for taking comments.

**Beth Pearson**  
**1917 N. 48<sup>th</sup> St.**  
**Seattle, WA 98103**

**ADUEIS**

---

**From:** Steven Richmond <GardenCycles@hotmail.com>  
**Sent:** Thursday, October 05, 2017 9:32 AM  
**To:** ADUEIS  
**Subject:** Fw: One Step Closer to Lowering Barriers for ADUs - We Want Your Input!

Density is good in cities to prevent sprawl in higher value habitat, so I support ADU's to increase housing supply, but any new development needs mitigation for stormwater - for the added cars, pets, and tree loss.

Evergreen vegetation (as opposed to lawns that do little to intercept/infiltrate stormwater) needs to be increased, but the blinders I see in landscaping around new developments is soil health. Designated growing areas should have woody matter (woodchips, sawdust, nurselogs) worked *into* the soil, not just on top, to increase the soil sponge and fungal filtration that cleans stormwater. And it grows plants really well, even if nitrogen is lacking the first year (easily compensated with compost). Beware too much compost leaches nitrogen into Puget Sound in winter rains. At least mix any compost with 50% sawdust (GroCo has this and is an excellent soil additive).

In a perfect world, I would incentivize evergreen vegetation and soil health, rather than regulations that can't foresee every circumstance, because it gives options to developers to balance density with environmental mitigation.

If utility fees (stormwater, wastewater, conservation district) could be repackaged (City/County partnership), this larger sum could be reduced using an algorithm that considered density-benefits, tree cover, soil health, absence of invasive plants, raingarden capacity, etc. It would be an optional program that landowners could apply for to get the fee breaks.

Thanks.

Steven K. Richmond / Garden Cycles  
GARDEC\*932JF; <http://gardencycles.com/>  
(206) 650-9807; fax (206) 763-0144

---

**From:** Councilmember Mike O'Brien <mike.obrien@seattle.gov>  
**Sent:** Wednesday, October 4, 2017 10:30 AM  
**To:** gardencycles@hotmail.com  
**Subject:** Office Hours: Budget Edition // One Step Closer to Lowering Barriers for ADUs - We Want Your Input!

Trouble seeing the message? [View this email in your browser.](#)



## Office Hours - Budget Edition



Thank you for participating in Office Hours and volunteering throughout the summer. Now that fall has returned, it is time to talk about how we can create a [City Budget](#) that works for every community. For this reason, I am doing office hours for the budget a little differently this year. For “Office Hours,” I hope to lead more of a conversation between neighbors so that we can determine office priorities together. I will present what folks in the community have said previously, and everyone will then have an opportunity to give further input. Here are more details:

- Date: Wednesday, October 11
- Time: 5pm-6:30pm
- Location: Phinney Neighborhood Association, Room 7

I hope you can join me!

---

## One Step Closer to Lowering Barriers for ADUs We Want Your Input!

Housing affordability is one of the biggest issues we face in Seattle today. The City has identified a need for providing a mix of housing types at prices accessible to people at all levels of income for homeowners and renters alike. I believe lowering the barriers to creating accessory dwelling units (ADUs) – also known as backyard cottages and mother-in-law units - is an important part of addressing affordability across the city. We’re beginning the environmental impact statement (EIS) process to analyze potential effects of encouraging more ADUs in Seattle.

### ***Share your feedback!***

The first phase of the EIS process is to determine the scope of the study, and the City wants

your input on what to consider and analyze as we explore allowing more ADUs in Seattle's neighborhoods. During the scoping phase, you can help determine the alternatives the City will study, potential environmental impacts to consider, and possible measures to avoid or reduce the effects of the proposal.

**DEADLINE:** Comments are due by 5:00 p.m. on November 1, 2017. You can share your input in several ways:

- **Online** at [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS)
- **By email** to [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- **By mail** to Aly Pennucci, City Council Central Staff, PO Box 34025 Seattle, WA 98124-4025
- **In person** at our two public scoping meetings
  - October 17, 2017, 6:00-7:30 p.m. at [High Point Community Center](#), 6920 34th Ave SW
  - October 26, 2017, 6:00-7:30 p.m. at [Hale's Ales](#) (in the Palladium), 4301 Leary Way NW

For more information, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

**What is an EIS?** An EIS is a tool to inform decision making about the positive and negative effects of a proposal. The proposal might be a project, like construction of a new building or road, or a new policy or plan that could affect the environment. Washington's State Environmental Policy Act (SEPA) requires Environmental Impact Statements so that the public, tribes, and other public agencies can help identify a proposal's environmental impacts, as well as strategies for reducing or avoiding them. Decision-makers can then approve, modify, or deny the proposal as appropriate.

[Read more about our proposed ADU policy and the EIS timeline here.](#)

In community,



Councilmember Mike O'Brien

Email: [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)

Phone: (206) 684-8800

Online: [Council Website](#)

 Facebook

 Twitter

 Website

 Email

*Copyright © 2017 Seattle City Council, All rights reserved.*

You signed up to receive updates from Councilmember Mike O'Brien. Thanks for staying in touch!

**Our mailing address is:**

Seattle City Council  
600 4th Ave  
Seattle, WA 98104

[Add us to your address book](#)

Want to change how you receive these emails?

You can [update your preferences](#) or [unsubscribe from this list](#)

**ADUEIS**

---

**From:** Michael <misha913@hotmail.com>  
**Sent:** Thursday, October 05, 2017 10:53 AM  
**To:** ADUEIS  
**Subject:** increasing density with accessory dwelling units

This effort comes a bit too late for my neighborhood. I live in Fremont on N. 35th st. and my neighbor's small house and mine are the only houses left on the block. In the last several years there are more than 2000 new apartment units within a 2 block radius of my house. It was always congested because of Fremont commercial traffic and now, thanks to the city's allowing the developers to do away with off street parking - too expensive?? Try to find a place to park! - near fisticuffs are breaking out over parking places. Road rage? more like parking spot rage. 30 years ago when I first bought my house the developers had to build 1.5 parking places per dwelling unit. AND THAT WAS TOO LITTLE! Every new unit is so expensive it required 2 incomes to pay for the mortgage. Now developers get a free ride and homeowners get to pick up the tab for upgrading and expanding sewers, water mains, electrical lines, other utilities, not to mention the deterioration of other utilities such as internet service, U.S. Mail delivery as apartment bldgs. overtax the letter carriers' time on their routes. Garbage pick up has been knocked out of shape, as well. Now the City has allowed delivery trucks to clog bus zones, two-way turn lanes, handicapped zones and frequently (check out Woodland Park Way N. between N. 35th St and Bridge Way- or better yet. Stone Way- and you'll see what I mean) just double park.

Nothing the City does is going to ameliorate the deterioration in my neighborhood but now this destruction is starting in Wallingford! I don't think covering the close-in areas with slap-dash stapled together apartment buildings is going to improve the situation. Let's get busy tunneling subway lines in all directions from Seattle, esp. under the Sound so Bremerton can "share in our prosperity". If transportation were seriously better, people would seriously prefer to not live in an inner-city rabbit warren.

Accessory dwelling units - better than tearing down buildings that were better-built than today. Of course density will increase but the City will still benefit from increased tax base. The variety of housing that will be available will be an attraction rather than the uniformly hated apartment blocks, such as in Germany, where I used to live. BTW there'd be less stress on the landfills, as well.

I could add two studio units on top of my new-ish garage. After the site across the alley to the south is developed this winter, there won't be a view from that deck, anyway. My single lot - 30'X120' could provide 2 units in the basement and 2 over the garage and still have 3 off street parking places. And you wouldn't see a thing change from the street. If you gave homeowners a little discount from their taxes for, say, 5 years, the City could radically increase infill and not really further uglify Seattle.

The argument of last century over pressure on neighborhood parking places is pointless, these days. The charm of these neighborhoods is what draws people here. Seattle's neighborhoods have coalesced in the past few decades into real communities, with real, unique, variety. You destroy that at your peril. People who move in here (lower Fremont), now, soon start to hate it and the crime and vandalism you have brought here in the last 3 decades. We don't enjoy throngs of rowdy, rude, malicious drunks who fill our streets after dark.

I challenge you to find ANYONE who likes what you've unleashed in Ballard. Let small property owners do the infill and keep it varied to the eye and to our lives.

Sincerely, Mike Russell

206. 612.2283

## ADUEIS

---

**From:** GWEN J BOYER <boyergj@msn.com>  
**Sent:** Friday, October 06, 2017 11:24 AM  
**To:** ADUEIS  
**Subject:** ADU: Seattle and Tax Incentive

Suggestion:

What about considering a tax reduction for home owners turning their basements or garage into an ADU. It's very expensive to remodel, and I'm a senior living on a reduced budget. The tax reduction would help with this initial expense. It could be for a set number of years.

Gwen Boyer

Boyergj@msn.com

Sent from my iPhone

**ADUEIS**

---

**From:** Cynthia Thichava <cthichava@gmail.com>  
**Sent:** Saturday, October 07, 2017 2:23 PM  
**To:** ADUEIS  
**Subject:** Re: Beginning our environmental review process for ADUs and backyard cottages

Council Members,

So pleased to see this study is finally happening. I own a single family home in West Seattle and have been very interested in building an ADU for our adult daughter to live in since 2014. We are retiring in Seattle and having our daughter close by makes it possible to "age in place".

Affordable housing in Seattle is nearly impossible to find. For the past 3 years our daughter has lived in our home as our renter. She commutes via bus to her job at a non-profit downtown. She has no interest in driving. I believe the parking requirement should be removed for private homeowners, especially since the builders of large complexes have no obligation to provide parking for their tenants.

I also believe the owner occupancy rule should be less restrictive. Spring of 2018 we plan to move to our West Seattle home full time. Our daughter will have to move out as there is not enough room for the three of us. Had the ability to build an ADU without the parking and owner occupancy rule, the transition to a cottage over our existing one car garage would have been smooth. Instead she is faced with a move and expenses associated that could have been avoided had we been able to build this cottage.

Small scale housing is a needed commodity.

Looking forward to the results of the EIS.

Cynthia A. Thichava  
 4055 41st Ave SW  
 972-762-7406

On Mon, Oct 2, 2017 at 3:02 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Good afternoon ,

Thank you for your ongoing interest in policies for accessory dwelling units (ADUs) and backyard cottages in Seattle.

Today we announced the beginning of the [environmental review process](#) to study the potential effects of removing barriers to building ADUs and backyard cottages in single-family zones.

The first phase of our Environmental Impact Statement (EIS) is scoping, where we ask for input about the alternatives we should study, potential impacts to consider, and possible ways to mitigate those impacts. Comments are due by 5:00 p.m. on November 1, 2017.

You can give us input during scoping in several ways:

- **online** <http://www.seattle.gov/council/adu-eis>
- **by email** at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- **by mail** to Aly Pennucci, Council Central Staff, PO Box 34025, Seattle, WA 98124-4025
- **in person** at our two public scoping meetings
- October 17, 2017, 6:00-7:30 p.m. at [High Point Community Center, 6920 34th Ave SW](#)

- October 26, 2017, 6:00-7:30 p.m. at [Hale's Ales](#) (in the Palladium), [4301 Leary Way NW](#)

Thanks again for participating in our effort to encourage more small-scale housing options in Seattle's neighborhoods. For more information about the EIS, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

## ADUEIS

---

**From:** Gmail <bernieob.bo@gmail.com>  
**Sent:** Monday, October 09, 2017 11:56 AM  
**To:** ADUEIS; Herbold, Lisa  
**Subject:** NO ADDITIONAL DWELLING UNITS IN WEST SEATTLE

Dear City Council and Ms Herbold,

NO ADU's

I am strongly in disagreement with the proposal to move forward with ANY additional dwelling units in the West Seattle neighborhood.

NO ADU's

There isn't the infrastructure of mass transit to accommodate the population. I doubt if there is the infrastructure in place for all utilities.

NO ADU's

As a 25 year resident of West Seattle it is an exceptional neighborhood in that we have:

Waterfront  
Water Taxi  
Sidewalks  
Parks  
Multi-generation family businesses

NO ADU's

With all of the recent development of condominiums in West Seattle the city has facilitated corridors that only accommodates transient pedestrian traffic rather than places for people to gather for free like in a central plaza. West Seattle neighborhoods and central business district run the threat of being taken over by large tall square blocks that keep the population from the light of day. The city is facilitating an accelerated development with little regard to the QUALITY of living in the neighborhoods.

Again NO ADU's in West Seattle.

Thank you

Bernard (Bernie) O'Brien  
6048 49th Ave SW  
Seattle, WA. 98136

Sent from my iPhone

**ADUEIS**

---

**From:** Jessica Gallery <jwtgallery@gmail.com>  
**Sent:** Monday, October 09, 2017 1:28 PM  
**To:** ADUEIS  
**Cc:** Levy, Susie  
**Subject:** Re: Question about ADUs/ Backyard Cottages

Thank you for responding.

Based on your answer below, it sounds like there is no such pilot program in existence, but other solutions are being examined.

Thank you again.  
Jessica

On Mon, Oct 9, 2017 at 10:04 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Hi,

Thank you for your comment. The EIS is focused specifically on changes to the land use code. In addition to that work looking at the land use code, CM O'Brien's office is working with the Office of Housing to develop programmatic opportunities to create rent/income restricted units, including looking into financing tools for interested homeowners. I have copied Susie Levy from CM O'Brien's office so she has your information.

Best,

Aly



**Aly Pennucci**, AICP | Legislative Analyst

City of Seattle | Council Central Staff | [206.684.8148](tel:206.684.8148)

PO Box 34025 | Seattle, WA | 98142-4025

**From:** Jessica Gallery [mailto:[jwtgallery@gmail.com](mailto:jwtgallery@gmail.com)]  
**Sent:** Sunday, October 08, 2017 12:30 AM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Question about ADUs/ Backyard Cottages

Hello,

I live on a block that is L Zoned- multi unit. There are still single family homes that exist, but many have sold to developers and are now multi unit buildings. Or, the single family residence remains but is a rental, with a large 3 story town house in the back where the back yard use to be.. These town houses can range from 700K to 900k in my neighborhood, Magnolia.

Is the city of Seattle considering a program like the pilot program in Portland where the city would pay for the construction of a backyard cottage in exchange for a family to be hosted for a few years in the dwelling paid for by the City? After a period of time, the resident that has offered their backyard space can then keep the dwelling and use it to rent or to provide housing for their own family?

I did not see anything on your website regarding such a program, which is unfortunate. I am not in a position to build a backyard cottage, but would be open to allowing a a family in need into a backyard cottage on my property. As long as that cottage was well constructed, and I could use it for my own extended family after a period of time.

Please advise is there is such a program being considered.

Thank you,

Jessica W.T. Gallery

## ADUEIS

---

**From:** Joan Davis <joandavis3@gmail.com>  
**Sent:** Monday, October 09, 2017 5:24 PM  
**To:** ADUEIS  
**Subject:** Cottage Housing

I live in the Ravenna Cottages, built in 2001 as a Demonstration Project by Threshold Housing when Paul Schell was Mayor. Nine 900 sq ft cottages surround a lovely courtyard, each with a garage and capacious storage room.

What prevents any more Cottages from being built in the City of Seattle? Zoning, I imagine. But can you revisit this?

Joan Davis  
6318 5th Ave NE  
Seattle, WA, 98115

## ADUEIS

---

**From:** Phyl Stewart <Phyls76@comcast.net>  
**Sent:** Monday, October 09, 2017 7:49 PM  
**To:** ADUEIS  
**Cc:** Herbold, Lisa  
**Subject:** Rezoning

Dear Councilmember Herbold,

I understand you are about to vote on a zoning change that would allow people in West Seattle to build up to 2 ADU's on a single lot with no additional parking requirements and are removing requirements for the owner to live on premises????

This will triple the density and number of cars in our neighborhoods and open the door for speculative development. I live in West Seattle and it is already highly congested on our streets with off street parking to the point where we have to pull over to let cars coming from the opposite direction pass because the streets are not wide enough to accommodate parking on both sides AND 2 way traffic.

If YOU lived next door to a lot that was sold to a developer who then built 2 additional rental units with no off street parking available I doubt that you would be happy with the resulting negative impact on your daily life, sleep, parking, commuting, shopping...living.

Please not NO on this short sighted and money (rather than quality of life) based proposal to protect our neighborhoods from this devastation.

Thank you so much.

Phyllis Stewart  
West Seattle resident.

**ADUEIS**

---

**From:** Michelle McCormick <mccormick-michelle@comcast.net>  
**Sent:** Thursday, October 12, 2017 8:27 AM  
**To:** Herbold, Lisa  
**Cc:** ADUEIS  
**Subject:** ADU

Dear Councilwoman Herbold,

As a West Seattle home owner I am opposed to the zoning change proposal to allow 2 ADR's per lot without requiring the owner to live on the premises and with no additional parking requirement for the following reasons:

- There is very little parking in my neighborhood as it is, and adding the potential for an additional 2 cars per ADU, and 2 ADU's per lot will greatly increase the number of cars and create an untenable parking situation. This is really unfair to permanent residents.
- Removing the requirement for property owners to reside on the property is a mistake. Allowing owners to live off- site will result in speculative development by investors who have no interest in the quality of life issues associated in a neighborhood full of rentals.
- After 20 years in my house I have observed that renters in my neighborhood where the owners live off-site, are generally not vested in the neighborhood, do not maintain their properties, and do not participate in the neighborhood community.
- Most of the serious crime in my neighborhood (drug houses, gang activity, murder) has originated on rental properties where the owners live off site.

I am in disbelief that such an unfair and short-sighted zoning change is even being proposed. This is in essence "taking of property".

Thank you for your consideration.

Michelle McCormick

**ADUEIS**

---

**From:** Glenn Pittenger <glenn.pittenger@gmail.com>  
**Sent:** Thursday, October 12, 2017 3:23 PM  
**To:** ADUEIS  
**Subject:** Re: ADU EIS Scoping period comment opportunity

Hi Aly & Nick,

I'd like to add 1 more comment, or suggestion for an alternative 3 in the scoping.

If one of the goals here is to get more people to build DADUs to create more housing, I think we should recognize that one of the reasons that more people aren't doing this, is that a lot of people don't want to become landlords nor do they want to spend the money to build a DADU, or go through all of the work of being involved in the design & construction of a DADU -- even if they contract that out to an architect/builder.

Thus, I think one way to get more dwellings in the SF zones, of a DADU scale, is to allow lots that qualify for a DADU, to instead, do a lot division such that the 2nd lot becomes an RSL lot and allows a dwelling sized somewhere between an RSL cottage and a DADU. This wouldn't work for all lots, but it would work for most corner lots that have room for a DADU, and there are many thousands of those in Seattle. The owners of those lots would then be allowed to divide off part of their large lot, and sell it to somebody else that wants to develop the RSL/DADU. I think for this to work, it would need to be RSL without any MHA requirement.

The idea is a synthesis of DADUs, RSL, and David Nieman's article from Crosscut published back in 2013, about allowing 2 houses on corner lots. <http://crosscut.com/2013/04/seattle-density-one-corner-two-houses/>

Regards,  
Glenn Pittenger

On Tue, Oct 3, 2017 at 5:28 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Glenn Pittenger [mailto:[glenn.pittenger@gmail.com](mailto:glenn.pittenger@gmail.com)]  
**Sent:** Tuesday, October 03, 2017 3:41 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Cc:** Levy, Susie <[Susie.Levy@seattle.gov](mailto:Susie.Levy@seattle.gov)>; O'Brien, Mike <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>  
**Subject:** Fwd: ADU EIS Scoping period comment opportunity

I'm writing to officially record my full support for the proposed ADU/DADU changes being proposed by council member Mike O'Brien. I believe those changes are documented on the ADU/DADU website as "alternative 2".

I've owned my property in the Green Lake / Roosevelt / Maple Leaf area (my lot is on the border of all 3 neighborhoods) for 24 years, and am a 3rd generation Seattle resident. I've been waiting for these changes, for many years, to entice me to consider building a DADU on my property ([8267 4th Ave NE](#)).

Of particular interest to me, is the provision to expand the allowed size of the DADU to 1000 sq ft (from 800), and allowing the sq footage of any attached garage to not be counted against the sq footage of the DADU. I'm also supportive of the height increase. And, I'm supportive of allowing both an ADU and a DADU on the same parcel/lot.

I understand there is some controversy and opposition to these changes, in particular allowing both a DADU/ADU on the same property, and removing the off-street parking requirements.

One suggestion that I'd make, which might help lessen some of the opposition, is to consider allowing both an ADU/DADU only on lots over a cert size, such as 5,000 sq ft or 6,000 sq ft. (and only lots smaller than 5,000 sq ft, allowing only one or the other). This might help reduce the fear that some have about "tripling" the density in the Single Family zones. By setting a lot size minimum, any tripling would only occur on larger lots -- and these larger lots happen to be fairly rare in the areas like Queen Anne & Wallingford -- where some of the opposition to the DADU changes are most vocal.

You might also consider making the same compromise for removing the parking requirement -- perhaps only remove the requirement for one of the ADUs, but not both. Meaning, if a person wants both an ADU & DADU on their property -- they must provide off street parking for one of the units.

While I fully support the proposed changes, I can understand why some neighborhoods fear a one-size fits all approach. Neighborhoods where the average lot size is near or below 4,000 sq ft, and where on street parking is already very crowded, might not be the best place to allow both an ADU & DADU on a lot, but neighborhoods where the average lot size is closer to 5,000 sq ft or larger -- and where on street parking is not tight, might see lower impact. In my area for example, the average lot size is just about exactly 5,000 sq ft, and on many streets, on street parking is abundant.

Getting the average lot size for lots by neighborhood, is rather straightforward, and I'd be happy to forward my own data analysis on the topic if you are interested, but it is something that any competent GIS person could get for you from the city/county parcel data.

Feel free to reach out if you have any questions about my support, or about the compromise ideas I forwarded.

Kind Regards,

Glenn Pittenger

[8267 4th Ave NE](#)

[Seattle, WA 98115](#)

----- Forwarded message -----

From: **O'Brien, Mike** <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>

Date: Mon, Oct 2, 2017 at 1:26 PM

Subject: ADU EIS Scoping period comment opportunity

To: "O'Brien, Mike" <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>

Cc: "Levy, Susie" <[Susie.Levy@seattle.gov](mailto:Susie.Levy@seattle.gov)>

Hello,

Thank you for your ongoing interest in our efforts to lower the barriers to creating accessory dwelling units (ADUs) as an important part of addressing affordability across the city. ***We're beginning the environmental review process to analyze potential effects of encouraging more ADUs in Seattle, and we want your input.***

Today the City of Seattle begins the environmental review process to study the effects of removing barriers to creating ADUs in single-family zones. The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of the study, and we want your input on what to consider and analyze as we explore allowing more ADUs in Seattle's neighborhoods. All of the information about the EIS process can be found [here](#).

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The City's proposal involves allowing both an in-law apartment and a backyard cottage on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, we're preparing an EIS to review the potential environmental impacts of this proposal.

During the scoping phase, you can help determine the alternatives to study, potential environmental impacts to consider, and possible measures to avoid or reduce the effects of the proposal. Comments are due by 5:00 p.m. on November 1, 2017. You can share your input in several ways:

- **online** at [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS)
- **by email** to [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- **by mail** to Aly Pennucci, City Council Central Staff, PO Box 34025 Seattle, WA 98124-4025
- **in person** at our two public scoping meetings
  - October 17, 2017, 6:00-7:30 p.m. at [High Point Community Center, 6920 34th Ave SW](#)
  - October 26, 2017, 6:00-7:30 p.m. at [Hale's Ales](#) (in the Palladium), [4301 Leary Way NW](#)

For more information, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

Thank you for your involvement through the process, and we will continue to keep you in the loop as we move forward.

Best,

Mike O'Brien

**Councilmember Mike O'Brien**

Chair, Sustainability and Transportation Committee

[Seattle City Council](#)

[206-684-8800](tel:206-684-8800)

Follow Mike on:      

[Sign Up for Mike's E-Newsletter](#)

*Note that all messages are subject to public disclosure*

**ADUEIS**

---

**From:** Cool B <coo.barimani@gmail.com>  
**Sent:** Thursday, October 12, 2017 3:34 PM  
**To:** ADUEIS  
**Subject:** Citizen Input: ADU's, DADU's

Hello,

By lifting some of the restrictions on ADU's and DADU's, Seattle could potentially add to its current (very limited) mix of housing stock, especially for those who are seeking modestly sized housing options that are affordable. Further, current homeowners (particularly in south Seattle) who are struggling to not become displaced by external factors (such as income tax and utility rate hikes) would potentially be able to add an income stream by renting out their own ADU's and DADU's.

Seattle has already allowed a huge portion of its poor and vulnerable populations to go homeless or become displaced and it is shameful to continue our current path of government overreach at the expense of primarily middle- and lower-class citizens. The percentage of homes currently with ADU's and DADU's in Seattle is extremely low and this needs to be changed, in addition to pro-infill policies in general, in most neighborhoods and especially in south Seattle where population density is less and lot sizes are larger on average.

Thank you for your consideration.

Regards,

Coo A. Barimani  
Cell: 360.393.0006  
[coo.barimani@gmail.com](mailto:coo.barimani@gmail.com)

## ADUEIS

---

**From:** grscruggs@gmail.com on behalf of Greg Scruggs <gregory.scruggs@gmail.com>  
**Sent:** Friday, October 13, 2017 9:23 AM  
**To:** ADUEIS  
**Subject:** Re: I support expanded ADUs

I support alternative 2 but not the no owner-occupancy provision. Eliminating the off-street parking requirement is essential.

On Fri, Oct 13, 2017 at 9:18 AM, Greg Scruggs <[gregory.scruggs@gmail.com](mailto:gregory.scruggs@gmail.com)> wrote:

My wife and I just bought a home in Squire Park. It's on a 4800 SF lot zoned for single family with no off street parking -- it's in a donut hole between two urban villages but well served by transit. We bought it with the hope that future ADU legislation would allow ADUs on our property even without the onerous and unnecessary off-street parking requirement so that eventually my widowed mother-in-law can move here and help us take care of our children, if/when we have them.

Regards,  
Gregory Scruggs  
323 15th Ave

## ADUEIS

---

**From:** Andrew Rosenkranz <andrew@pacificmarketresearch.com>  
**Sent:** Friday, October 13, 2017 2:44 PM  
**To:** ADUEIS  
**Subject:** Changes to the EIS

Hello,

I am a Seattle resident and homeowner, and I would like to voice my concern and initial opposition to the proposed changes to the EIS to allow three units in place of any single family home in Seattle.

I do not approve of the changes, and there has been no study of the impacts, and no efforts to identify and mitigate the impacts to homeowners, property, and neighborhoods. In fact, the measure implies there will no impacts on neighborhoods, which doesn't even make sense.

Instead, I'd like to see a measured and thoughtful approach that takes in to account the needs and interests of people who live in the neighborhoods.

Thank you for your consideration,  
Andrew Rosenkranz  
(206) 852-4400

**ADUEIS**

---

**From:** Gabe Levin <gabe.levin@gmail.com>  
**Sent:** Friday, October 13, 2017 3:42 PM  
**To:** ADUEIS

*Dear Aly,*

*The proposed densification of 100,000 single family home sites in the City of Seattle is no small matter. People move to Seattle in order to enjoy a single-family home nestled into a mosaic of densities. The environmental problems with adding residential density are many and won't be recognized until it is too late.*

*I live in a doubly environmentally critical area, a Steep Slope in a Shoreline Area near Portage Bay. Already we flood sewage and sheet flows into Portage Bay several times per year. Adding impervious area and tripling the number of cars will not help that.*

*Our neighborhood has limited public transit. New arrivals have a car at a rate of just under one per adult. The proposed ADU/DADU legislation would more than triple the amount of cars on our streets while taking away off-street stalls. Talk of autonomous vehicles is just talk. For now and the foreseeable future, working adults in Seattle have cars.*

*There are exceptions of course, areas where adding density makes sense, on top of light rail stops, for example. Those sites should encourage tall, type I construction with a variety of densities greater than the silly "five over two" stick built microstudios we have overbuilt.*

*But the majority of Seattle's land area is made up of single family homes, whose gardens and outdoor areas are cared for by their resident owners. Adding density and rewarding non-resident investment on lots as small as 3,200sf will have predictable negative impacts on quality of life, congestion, parking and sitewater issues, in addition to blocking natural light from reaching the neighbors. Here are a few:*

- 1) allowing DADUs on ever smaller lots will have a negative impact on tree canopy in single-family neighborhoods, especially urban areas with many smaller lots. Seattle is already losing its tree canopy at an alarming rate, and this change in the law would accelerate that trend.*
- 2) Combined sewer overflows are already a problem in many neighborhoods, and this legislation will add housing units that will contribute more sewage, which will increase pollution in our lakes and waterways.*
- 3) While it is true that current regulations already allow 8 unrelated people to share a single-family home, that is more of a theoretical possibility than a common occurrence. Changing the rules to allow and encourage more DADUs on single-family lots, and to allow both a DADU and an ADU on the same single-family lot, will significantly increase the average number of adults living on a single-family lot, which will lead to more cars in the block/ neighborhood. The proposed legislation increases the limit for a residential lot to 12 and makes it much more likely that 12 unrelated adults will live on one 3,200sf lot. BOTH of these factors must be taken into account in an EIS.*
- 4) Many homes already have inadequate water pressure, and sewer lines are failing as they pass the 100 year mark. In older neighborhoods like those impacted by this legislation, there are areas served by side-sewers that are often old and inadequate for today's density, tripling the density will accelerate the failure rate.*
- 5) There is no doubt that developers are poised to exploit every detail of these new regulations to make as much money as possible, that's OK, that's America, but the behavior of institutional capital must be considered when we make a change to an inventory of 100,000 home sites.*

*At certain points in the market cycle, like today, a complete tear-down and rebuild will make economic sense. With our city's densification process opened up to global capital, the tear downs will happen very quickly. The City estimated that less than 4,000 new ADUS would be built due to this legislation. If the City's estimates are correct, then there is no reason to enact these legislative changes; they will not make any real difference in affordable housing.*

*If, however, the City has failed to anticipate the likelihood that developers and speculators will take full advantage of these new regulations to buy up single-family homes with ADUs and DADUs more than one year after the ADUs and DADUs are permitted (perhaps even encouraging home owners to permit them through providing financing), then the environmental impacts must be calculated based on a near tripling of residential density across today's urban environment.*

*Please do not support the DADU/ADU legislation.*

*Thank you,*

*Gabe Levin*

*206 973 9172*

**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Friday, October 13, 2017 4:22 PM  
**To:** aileen langhans; Johnson, Rob  
**Cc:** ADUEIS  
**Subject:** RE: The Proposed changes to AADU/DADU regulations:

Good afternoon Aileen,

The analysis of alternatives will take the better part of 2018 to consider. I cannot speak to analysis that has not yet taken place. Your requests for additional analysis and questions of anticipated impacts are best placed within the EIS process at this time as the Council does not currently have legislation on ADU/DADUs.

Again, I encourage you to participate in the EIS process including:

- **Providing Direction During The Scoping Phase-** helps determine what types of analysis should be done and factors to consider
- **Commenting on the Draft Environmental Impact Statement-** comment on analysis and alternatives
- **Reviewing the Final Environmental Impact Statement-** Will included a preferred alternative
- **And Engaging in the Legislative Process-** as City Council Considers legislation and potential amendments

Please let me know if you would like to schedule a time to speak on the phone or ways to make sure that the UPCC has access to information throughout the process to stay informed and engaged.

All the best,

Spencer Williams, AICP, Assoc. AIA  
Legislative Assistant to Councilmember Johnson-District 4  
E: [Spencer.Williams@Seattle.Gov](mailto:Spencer.Williams@Seattle.Gov)  
O: (206) 684-8168  
C: (206) 384-2709

[Click Here to Sign Up for Rob's Newsletter](#)



---

**From:** aileen langhans [mailto:aileenmargaret@yahoo.com]  
**Sent:** Friday, October 13, 2017 3:35 PM  
**To:** Johnson, Rob <Rob.Johnson@seattle.gov>; Williams, Spencer <Spencer.Williams@seattle.gov>

Cc: ADUEIS <ADUEIS@seattle.gov>

Subject: RE: The Proposed changes to AADU/DADU regulations:

Dear Mr. Spencer,

With all due respect, I thought that Mr. Rob Johnson was supposed to represent District 4, address our concerns and represent the needs and issues facing his constituents. As far as I am concerned, the central city government is not interested in any specific negative impacts within the proposal that might face specific neighborhoods and cause grievous damage. **That is exactly why the city council was divided into districts, so that each section of the city receives representation. So, I expect Mr. Johnson to actually take that responsibility seriously.**

As for the two open house events, I don't believe I will be able to get a ride to either one, as they are too late in the evening (with the sun setting earlier each night) and are too far away. I am not able to drive because of visual issues (which also make it difficult to devour the pages of online documents), so I must depend on my sister.

Furthermore, my many experiences communicating any comments with city officials have been disappointing: Whenever I would sign a specific form at any open house requesting more information, I was NEVER contacted. And, whenever I brought issues to city representatives, I NEVER received any follow-up, although they were quick to say, "We will get back to you." I am beginning to think I would have better luck if I were to place my comments in a bottle and toss them out into Lake Washington or Puget Sound. Or perhaps I should carve them into rock slabs to be rediscovered by future archaeologists.

Please be honest: is the proposal finalized, with the only loose end being the writing of the EIS, a task which the city is now required to perform because of a decision by the hearing examiner? Or, is the city open to making meaningful revisions to the proposal based on input during this brief comment period? It appears from your comments below ***(The City is currently in the scoping phase for the Environmental Impact Statement which will assess and study the potential impacts related to changes in ADU/DADU policies.)*** and from past contacts, that the city merely needs to acknowledge that there could be negative impacts; there is no requirement that the proposal be amended to address and minimized these impacts. Correct me if I am wrong.

While I appreciate your prompt response, I am not impressed with how easily you have dismissed my letter and passed it off to someone else, who has NO ties to our district and no responsibility to represent its residents.

Sincerely,

Aileen M. Langhans

On Friday, October 13, 2017, 1:59:58 PM PDT, Williams, Spencer <[Spencer.Williams@seattle.gov](mailto:Spencer.Williams@seattle.gov)> wrote:

Good afternoon Aileen,

Thank you for your message and concerns. I have forwarded your comments, via this email, to staff working to complete the ADU/DADU review.

More information about the city's strategies to encourage backyard cottages can be found at <http://www.seattle.gov/opcd/ongoing-initiatives/encouraging-backyard-cottages>.

The City is currently in the scoping phase for the Environmental Impact Statement which will assess and study the potential impacts related to changes in ADU/DADU policies. **I encourage you to provide comment on that draft scope which can be found at <http://www.seattle.gov/council/adu-eis>. You can comment by the following methods:**

[See the proposed EIS scope](#) (I have also included the scoping document and supportive materials that will be at the public meetings on this message)

- [Online comment form](#)
- In writing at the EIS Public Scoping Meetings/Open Houses. These meetings will provide an opportunity to learn more about the proposed land use code changes and provide input on the environmental review process:
  1. October 17, 2017, 6:00-7:30 p.m.  
Location: High Point Community Center, 6920 34th Ave SW, Seattle, WA 98126
  2. October 26, 2017, 6:00-7:30 p.m.  
Location: Hale's Ales (in the Palladium), 4301 Leary Way NW, Seattle, WA 98107
- Via e-mail to: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- In writing to: Aly Pennucci, PO Box 34025 Seattle, WA 98124-4025

Your comments and questions are best directed to the EIS Process.

Thank you for your attention to this issue. For questions on the proposal, you can reach out to the staff member listed on the project page Nick Welch ([nicolas.welch@seattle.gov](mailto:nicolas.welch@seattle.gov)).

All the best,

**Spencer Williams, AICP, Assoc. AIA**

Legislative Assistant to Councilmember Johnson-District 4

E: [Spencer.Williams@Seattle.Gov](mailto:Spencer.Williams@Seattle.Gov)

O: (206) 684-8168

C: (206) 384-2709



---

**From:** aileen langhans [<mailto:aileenmargaret@yahoo.com>]

**Sent:** Thursday, October 12, 2017 5:53 PM

**To:** Johnson, Rob <[Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov)>

**Cc:** Aileen Langhans <[aileenmargaret@yahoo.com](mailto:aileenmargaret@yahoo.com)>

**Subject:** The Proposed changes to AADU/DADU regulations: URGENT RESPONSE REQUESTED!

## **RE: Accessory Dwelling Units – Proposed changes**

Dear Council Member Johnson:

It is with a deep frustration and sincere mistrust that I send this most urgent correspondence. The City of Seattle is in the process of creating an Environmental Impact Statement on the proposed expansion of the DADU/AADU regulations, but regrettably, only after being challenged through an appeal process. I have attended several meetings and other events promoting these proposals, but I am still uncertain about some of the changes and how their implementation will actually achieve the anticipated and promised results, while minimizing any potentially destructive impacts.

**I hereby request a response to each of the following specific concerns as soon as possible:**

- The expansion of regulations to permit accessory dwelling units on properties without the owner occupancy requirement is quite disconcerting. During the city meetings I have attended, the city stated that these units will

be a practical way of increasing density by providing affordable housing for more families. The city shared the following benefits that will result from the change – helping families make their mortgage payments, providing housing for extended family members, and/or providing income to help with catastrophic expenses that would otherwise crush their budgets. All of these examples involve owner occupied properties. SO, exactly how will this expansion of the law be advantageous to the absentee owner and speculator, while contributing positively to our neighborhoods? In other words, how will their benefits outweigh the potential negative impacts the city failed to acknowledge until challenged? **Please provide me with specific examples that justify this most aggressive and radical change. If you fail to do so, then please explain the role these property owners played in drafting the change.**

- Given the just released plan for flexible parking, will the city finally realize and acknowledge that releasing the property owner from providing any off-street parking for its accessory dwelling renters will lead to the dumping of more cars onto the streets? **Surely this will only exacerbate the parking dilemma.**
- The reduction in lot size requirements and the increase in square footage allowed for accessory dwelling units will cause a loss of open yard, with the following problems: loss of vegetation, loss of habitat for other species with whom we share our earth, and an increased risk of the spread of fires from building to building. **Please explain why these changes are needed, what negative challenges will be faced, and how the so-called improvements will outweigh and dwarf any serious impacts. Again, please be specific!**
- Seattle is making these changes city-wide, without any assessment of and reflection on how they will disproportionately impact various neighborhoods. City Officials are quick to denounce the single-family neighborhood as deleterious to a growing population, given the need for affordable housing; but they fail to acknowledge that many of our homes which appear to be single-family from the streetscape actually contain hidden pockets of dense, affordable housing units, purchased by aggressive developers with deep pockets. The deconstruction of these homes into sub-leased rental units, in some homes as many as 16 units and most often without permits and/or official registration through the RRIO program, leads to an inaccurately low inventory by city departments of the true number of affordable units presently existing in our neighborhood. The problem is amplified by the fact that up to 8 unrelated adults can live in each home, which, in turn, has created much destruction to the integrity, health and vibrancy of our neighborhood, through excessive noise, garbage, parking violations, rambunctious parties, etc. And, since most of these tenants are transient, they have no ties to the neighborhood and no true sense of community spirit – an honorable goal which the city claims will be achieved through its generous amendments. Furthermore, although the city claims to be concerned about the health and safety of its renters, many of these units are not inspected, because they are not even documented in the RRIO application forms. **Please explain how the City will seek to offset any and all potentially negative impacts within those communities most likely to be compromised by the fruits of the new regulations.**
- Enforcement seems to be chronically and conspicuously lacking in any legislation passed in our fair city. **Given the poor implementation of the RRIO regulations, how does the city propose to demand compliance from these property owners? Again, be specific.**

There are many other issues that I believe need to be addressed prior to final approval of the new regulations, but these are of greatest concern to me and to our University Park Neighborhood.

**I am on the board of UPCC and our next meeting is on Thursday, October 19th, with a community-wide meeting to follow, on Wednesday, October 25th. I would sincerely appreciate your response in a timely manner, so that we can have a productive discussion about the topic at both meetings.**

Thank you for your dedicated service on behalf of the citizens of Seattle.

Sincerely,

Aileen M. Langhans

UPCC board- secretary

## ADUEIS

---

**From:** cgjanzen@comcast.net  
**Sent:** Friday, October 13, 2017 7:14 PM  
**To:** ADUEIS  
**Subject:** I support Alternative 1!

Dear Council:

In regard to your EIS for doing away with pretty much all regulations on ADU's, I prefer Alternative 1, no action.

Where are three families going to park since the entire lot and parking areas will be taken up with buildings? It's foolish to think none of them will own cars.

I find it ironic, that on the one hand, the City of Seattle gives out excess trees with instructions to be planted in yards, and now wants to pretty much do away with yards in favor of allowing them to be overly developed.

I hate the idea of allowing taller buildings and allowing them to be built anywhere on the property. Having no regulations is a developer's dream as they are already taking down house after house and replacing them with huge, ugly houses with attachments that take up the entire lot. This will be even worse.

This idea was trotted out a couple of years ago and the people were so outraged, it was taken off the table. Why is it back now?

I know if my neighbors start selling out to developers or sell to people using the lot for three rental units, I will be moving. Demolishing our neighborhoods to cram more people into high priced units is great for developers and landlords, but changes the character of the neighborhood. Basically, the city is taking away single family zones with Alternative 2, and I vehemently disagree with that.

Sincerely,  
Gayle Janzen

**ADUEIS**

---

**From:** Ginger Gibson <ginger.gibson@comcast.net>  
**Sent:** Saturday, October 14, 2017 12:37 PM  
**To:** ADUEIS  
**Subject:** NO to O'Brien's Backyard Cottage Legislation

To whom it may concern:

I am writing to express my strong opposition to Councilmember Mike O'Brien's Backyard Cottage Legislation. I live in Queen Ann, one of Seattle's oldest and loveliest neighborhoods. Seattle neighborhoods are comprised of small lots with houses in close proximity to each other. Zoning and building codes are in place to protect our neighborhoods. Councilmember O'Brien's plan is fraught with high-impact and long term problems that will be impossible to unravel once in place.

Seattle is an old city with old infrastructure that will not support the surge in density that Councilmember O'Brien's proposal will bring. Many Seattle homes do not have garages for parking. Doubling or tripling the number of cars per household is irresponsible and not feasible considering the already limited street parking available throughout our city neighborhoods.

Councilmember O'Brien's proposal opens the door to developers to create rental properties with transient populations. We are in danger of losing the sense of history and continuity of our unique neighborhoods. I believe this will contribute to the decline of our neighborhoods and the quality of life we enjoy in Seattle. Please do NOT allow Councilmember O'Brien's legislative proposal to go through without a thorough study and professional analysis of the profoundly negative impact his proposal would have on our city.

Thank you.

Sincerely,

Virginia Gibson  
416 Wheeler Street  
Seattle, WA 98109

**ADUEIS**

---

**From:** Darrell Gibson <digibson@me.com>  
**Sent:** Saturday, October 14, 2017 2:41 PM  
**To:** ADUEIS  
**Subject:** Single-Family Rezone

To Whom It May Concern:

I am writing to express my opposition to Council Member O'Brien's proposed Backyard Change Legislation.

I live in the Queen Anne neighborhood and am very familiar with the difficulties of living in an area that is undergoing a huge change in population density with no foresight into the effects it will have in the future. The infrastructure of the QA neighborhood cannot handle the population as it is with regards to sidewalk and automobile use which can plainly be seen by simply walking the streets of the area. The sidewalks and roads are in poor condition and the City has and continues to do little or nothing about them - this problem will only get worse with an increase in the usage by more autos in the area. The water and sewage infrastructure cannot at this time handle the usage of our current residents and adding two, three or four times the population in our neighborhood would prove disastrous.

The neighborhoods of the inner city are for the most part comprised of homes on very small lots and our zoning and building codes are supposed to be in place to protect the areas from the type of proposal this Council member has made. Simply thinking through the effect of limited parking on our narrow streets with an increased population would negatively affect all the citizens in the neighborhood.

I don't know who's pushing this non-sensicle proposal forward through this Council member but it is quite obvious that this change would be negative for homeowners and result in the areas developers creating more and more rental properties with transient populations which do nothing for the stability of the neighborhood.

My vote is a strong NO with regard to O'Brien's proposed change without a thorough study by an independent board ensuring that any and all changes with regard to our City's building and zoning codes does NOT affect homeowners who have worked for many years to enjoy a property they can be proud of.

Sincerely

Darrell Gibson  
416 Wheeler St.  
Seattle, WA

## ADUEIS

---

**From:** Craig Woodson <crwoodson@msn.com>  
**Sent:** Monday, October 16, 2017 9:25 AM  
**To:** ADUEIS; Pennucci, Aly; O'Brien, Mike  
**Cc:** Kaplan, Martin  
**Subject:** ADU/DADU ideas

Dear Aly Pennucci,

Thank you and Councilmember O'Brien both for taking action to tackle our citywide problem with housing. The ADU and DADU proposals are forward thinking and will go a long way to lessening the challenges we face as a community. Of course, once again, there will be resistance to these ideas from existing homeowners but I think utilizing some of the following zoning/land use tactics could go a long way in helping you implement your vision.

1) The major pushback from the prior attempt to expand citywide accessory housing was the traffic and associated parking problems created, the contention that doing so will ruin existing SF zoned areas and the claim that developers will build a triplex on every lot. To combat this it seems prudent to prioritize areas on existing transit routes for rezoning. The traffic is already there and the presence of the bus line(s) defeats the claim of a quiet SF neighborhood. An added bonus is that dense housing will be placed where transit is and then fan out from those arterials into the traditional SF neighborhoods surrounding those arterials.

2) By prioritizing the arterials with aggressive zoning changes you can truthfully and confidently respond that the impact to SF neighborhoods will be rather gradual as the land along arterials will be developed first and provide the lions' share of the needed housing. By creating supply on the arterials for the developers that the neighborhood associations have such anxiety about, the incentive to create ADUs and DADUs in SF zones will become somewhat less attractive to those same speculators. While ADUs and DADUs will still and should still be built, it would eliminate the argument that developers will descend on every peaceful little SF neighborhood and ruin it. If more can be made building on or near bus lines they will do so and all this consternation about a triplex on every lot would be curtailed.

3) A sensible way to decide what zoning density goes where might be to use the existing number of bus lines on a street as a guide. This will both protect lightly traveled neighborhoods and place denser housing where denser transit is. Additionally homeowners that have purchased along a bus line cannot legitimately argue that you are transforming/ruining their quiet SF neighborhood when it never was one in the first place. A very basic plan could be:

Full ADU/DADU expansion\* or L1 zoning on streets with 1 bus line  
 L2 for 2 bus lines  
 L3 for 3 bus lines  
 L4 or MR for 4 bus lines and up.

\*You could also phase in the ADU/DADU expansion by initially allowing it in SF neighborhoods that are within a block or two of a bus line. A year or so after that you could expand it another few blocks and so on. That

way you are creating a transition zone of sorts between the L2/3/4 etc. zoning on the arterials and the SF neighborhoods while at the same time making the ADU/DADU a short walk from rapid transit.

I think by prioritizing housing density along arterials you will greatly reduce the concerns of existing neighborhood organizations that ADUs and DADUs will ruin their neighborhood and be built anywhere and everywhere. Without the specter of developers buying up entire blocks (that would not happen but fear motivates) and abusing this land-use change, the ADU and DADU footprint can be expanded and then mature/blossom in a more organic/natural manner. Under these conditions I believe the vast majority of the ADUs and DADUs built will be by existing homeowners who wish to remain in their home but need some income from their most valuable asset. Certainly these homeowners do not want to destroy their own neighborhood or the value of their home so they are the very definition of good shepherds for this land use change.

Hope you consider these ideas as you wrestle with all the moving parts and competing interests regarding this housing crisis we find ourselves in. Thank you and best of luck.

Kind Regards,

Craig R. Woodson

**ADUEIS**

---

**From:** Aldan Shank <aldanshank@gmail.com>  
**Sent:** Monday, October 16, 2017 3:50 PM  
**To:** ADUEIS  
**Subject:** in favor of ADUs

Dear City Council,

I'm writing to express my strong support for the City allowing the construction of accessory dwelling units (ADUs) in Seattle.

I am a 35-year-old male living in the basement of a house owned by my friends. At some point, I would very much like to move out and into a place of my own, but there seem to be very few renting options that I can afford, let alone purchase options, which seem like a far-off fantasy.

I have privileges that many people do not: I am white and male. I have a decent office job that pays in the high \$60k range (I have student debt, but I am paying it down). The situation is difficult enough for me; I can't imagine what it must be like to be a person of color, and/or a woman, and/or an immigrant, and/or someone with an hourly wage.

ADUs seem like a great way to increase the stock of housing in Seattle without tearing down old structures or erecting lots of tall, new apartment complexes (which often don't contain affordable units for non-tech workers like me). ADUs alone won't solve our housing crisis, but it seems like they could be one part of a multi-faceted solution that could drive down rent costs and provide more places for our booming population to live.

I love Seattle and don't want to move out of the city--it's been my home for 11 years. But that is exactly what I'll have to do if rent prices don't stabilize. Please accelerate the environmental impact study and vote to approve ADUs as one way to increase the housing stock and thereby lower rent costs for everyone.

Thanks,  
Aldan Shank  
206 356 1913

**ADUEIS**

---

**From:** Lorin Boynton <loring@u.washington.edu>  
**Sent:** Monday, October 16, 2017 11:46 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Unit Environmental Review Process

Dear Aly,

I find the proposed densification of 100,000 single family home sites in the City of Seattle very concerning.

I live in Portage Bay. Already we flood sewage and sheet flows into Portage Bay several times per year. Adding impervious area and tripling the number of cars will not help that.

Our neighborhood has limited public transit. Any new arrivals have a car at a rate of just under one per adult. The proposed ADU/DADU legislation would more than triple the amount of cars on our streets while taking away off-street stalls. I am fortunate to have a garage where I park my car. I often see neighbors driving up and down the street in the evening looking for parking as it is so limited. Recently, one of my neighbors parked his car in the alley as he couldn't find street parking and it was broken into that night.

Careful thought needs to be put into figuring out where it makes sense to add housing density in Seattle- near light rail stops, for example, seems to make sense.

The majority of Seattle's land area is made up of single family homes, whose gardens and outdoor areas are cared for by their resident owners. Adding density and rewarding non-resident investment on a 3,200sf lot will have predictable negative impacts on quality of life, congestion, parking and sitewater issues, in addition to blocking natural light from reaching the neighbors.

Here are a few:

- 1) allowing DADUs on ever smaller lots will have a negative impact on tree canopy in single-family neighborhoods, especially urban areas with many smaller lots. Seattle is already losing its tree canopy at an alarming rate, and this change in the law would accelerate that trend.
- 2) Combined sewer overflows are already a problem in many neighborhoods, and this legislation will add housing units that will contribute more sewage, which will increase pollution in our lakes and waterways.
- 3) While it is true that current regulations already allow 8 unrelated people to share a single-family home, that is more of a theoretical possibility than a common occurrence. Changing the rules to allow and encourage more DADUs on single-family lots, and to allow both a DADU and an ADU on the same single-family lot, will significantly increase the average number of adults living on a single-family lot, which will lead to more cars in the block/ neighborhood. The proposed legislation increases the limit for a residential lot to 12 and makes it much more likely that 12 unrelated adults will live on one 3,200sf lot. BOTH of these factors must be taken into account in an EIS.
- 4) Many homes already have inadequate water pressure, and sewer lines are failing as they pass the 100 year mark. In older neighborhoods like those impacted by this legislation, there are areas served by side-sewers that are often old and inadequate for today's density.

5) There is no doubt that developers are poised to exploit every detail of these new regulations to make as much money as possible, that's OK, that's America, but the behavior of institutional capital must be considered when we make a change to an inventory of 100,000 home sites.

Please do not support the DADU/ADU legislation.

Thank you,

Lorin Boynton  
877 E Gwinn Pl

## ADUEIS

---

**From:** Barbara Davidson <babsemail@gmail.com>  
**Sent:** Tuesday, October 17, 2017 10:26 AM  
**To:** ADUEIS  
**Subject:** single family to 3

To Whom It May Concern,

Please, please do not change the zoning of single family units to allow 3 units on the same property!

These units are environmentally wrong. They wrong for our neighborhoods. Just do not do it!

Sincerely,  
Barbara Davidson  
22 West Lee St.  
98119

206-789-0866

## ADUEIS

---

**From:** William Horn <billanderika@icloud.com>  
**Sent:** Tuesday, October 17, 2017 12:55 PM  
**To:** ADUEIS  
**Subject:** Rezoning

**IT IS OUTRAGEOUS THAT SEATTLE WOULD WANT TO CONVERT SINGLE FAMILY NEIGHBORHOODS TO MULTI-FAMILY!!**  
OUR NEIGHBORHOODS ARE JUST FINE THE WAY THEY ARE;. But of course this is Seattle and the liberal agenda. We are sick and tired of these ridiculous ideas presented by the Seattle City Council.

**ADUEIS**

---

**From:** Karen Sticklin <Karen.Sticklin@highlineschools.org>  
**Sent:** Tuesday, October 17, 2017 2:14 PM  
**To:** ADUEIS  
**Subject:** accessory dwelling units

Hi, I live in West Seattle and support most of the proposed changes. Here in West Seattle, we definitely don't need off street parking, at least not in my neighborhood. I hesitate to allow these units in homes that are not owner occupied as that can change the neighborhood feel. With owners and renters together, we get a great mix of folks.

One additional comment: homeowners that create additional housing on their property, either attached or detached, should have a streamlined permitting process with 1/10<sup>th</sup> of the cost. This is the best way to add housing to a neighborhood and still preserve the neighborhood and we should encourage it!

Karen Sticklin

## ADUEIS

---

**From:** Diane Johnson <julycreek@comcast.net>  
**Sent:** Tuesday, October 17, 2017 5:33 PM  
**To:** ADUEIS  
**Subject:** comment for EIS regarding ADUs

Hello.

I am requesting that the City of Seattle leave most of the existing restrictions in place for Accessory Dwelling Units (ADU) in residential zones.

I don't want City to boost density much or else the residential areas will become noisy and devoid of enough parking like the crowded L-zones areas that are full of rentals.

My husband Mark and I would like density to only go up to only 2 units maximum per parcel, consisting of the primary house plus only 1 ADU regardless of whether it's attached or detached.

It seems ok if owner lives elsewhere.

Please provide at least 1 off-street parking space for each unit.

Thank you.

Diane Johnson and Mark Olsoe  
In West Seattle

**ADUEIS**

---

**From:** Rose Yu <rosehyu@me.com>  
**Sent:** Tuesday, October 17, 2017 7:55 PM  
**To:** ADUEIS  
**Subject:** ADU comments

Hello,

I think if an owner has both an ADU and a DADU then it would seem adding an off street parking space might be prudent. It might be important to look at it from neighborhood to neighborhood as there are certain areas where parking is already really tight.

Examples: I would suggest showing a few examples of what's possible now on a 4K lot and what would be possible on a 3.2K lot. It is hard to imagine with just words. It would also help if you had not just architectural renderings but examples of built ADUs and DADUs.

Lastly, what if you did some preliminary calculations on what it would mean in terms of alleviating some of the supply problems with housing if 10% of single family households who have adequate space added one of these. What if 25% did. Give us the vision of what it means when we all pitch in as concerned citizens to make our neighborhoods more affordable and accessible to others.

It would be nice if you gave some design guidance so that we can see how aesthetically this could work within an older neighborhood.

Thanks,  
Rose Yu

## ADUEIS

---

**From:** Dan Allison <dan5619@gmail.com>  
**Sent:** Tuesday, October 17, 2017 8:22 PM  
**To:** ADUEIS  
**Subject:** Dadu

Please make the proposed changes to the Dadu rules. Having additional housing will help ease the housing crisis in Seattle.

Thanks,  
Dan

## ADUEIS

---

**From:** Debra Thompson Harvey <debra@debrathompsonharvey.com>  
**Sent:** Tuesday, October 17, 2017 8:26 PM  
**To:** ADUEIS  
**Subject:** City of Seattle ADU EIS

### 1. Reasonable range of alternatives

Alternative 2 is preferable to me for these reasons:

- Alternative 2 allows for housing affordability while increasing density.
- Alternative 2 allows our elderly people to age in place while receiving rental income from their homes.
- Alternative 2 is a powerful disincentive to all of the tearing down and the overpriced unsustainable building that is happening daily in every neighborhood.

### 2. Measures to avoid, minimize, and mitigate effects of the proposal

- Additional pressure on our roads, sewers and water pipes must be addressed and avoided.
- There is no additional need to provide off-street parking if our transportation system continues to keep pace with the increased demand.

•

### 3. Other comments or suggestions related to the scope of the EIS

1. **Change zone name from 'Single Family' to 'Residential.'** Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
2. **Waive building permit fees for 5 years** for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. **Use Green Building incentives** similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. **Housing Opportunity Overlay.** Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
5. **Upgrading non-conforming housing types and uses, such as duplexes, established before 1995.** There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
6. **Buffering detached houses from higher zones:** If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. **Make accessory dwelling units easier to built.** Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. **Study using Floor Area Ratio to restrict size of development and incentivize additional housing units.** Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
9. **Double Ownership.** Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot

ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

10. **Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings.** One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## ADUEIS

---

**From:** vpardee <vpardee@aol.com>  
**Sent:** Wednesday, October 18, 2017 7:59 AM  
**To:** ADUEIS  
**Subject:** An example of DADU happening right NOW!!!

My friends in Port Townsend are in the process of adding a DADU to their site.  
I thought you (& the city of Seattle)  
Might be interested in seeing how the process is moving.

Vicki Pardee  
[Vpardee@aol.com](mailto:vpardee@aol.com)

Begin forwarded message:

**From:** [bkdproductions@gmail.com](mailto:bkdproductions@gmail.com)  
**Date:** October 14, 2017 at 11:19:43 AM PDT  
**To:** Vicki Pardee <[vpardee@aol.com](mailto:vpardee@aol.com)>  
**Subject:** Fwd: Arrived

Cute eh!

Sent from my iPhone

Begin forwarded message:

**From:** Bonnie Hamma <[bkdproductions@gmail.com](mailto:bkdproductions@gmail.com)>  
**Date:** October 13, 2017 at 5:03:07 PM PDT  
**To:** hamma and mcgee <[bkdproductions@gmail.com](mailto:bkdproductions@gmail.com)>  
**Subject:** Arrived

40 min and done













Sent from bk's iPad

## ADUEIS

---

**From:** Lisa Power <lisa@lisapowersalon.com>  
**Sent:** Wednesday, October 18, 2017 8:57 AM  
**To:** ADUEIS  
**Subject:** RE: eis for accessory dwelling units

Thank you for your response!!  
Lisa

----- Original message -----

**From:** ADUEIS <ADUEIS@seattle.gov>  
**Date:** 10/18/17 8:48 AM (GMT-08:00)  
**To:** Lisa Power <lisa@lisapowersalon.com>  
**Subject:** RE: eis for accessory dwelling units

Lisa,

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** Lisa Power [mailto:lisa@lisapowersalon.com]  
**Sent:** Tuesday, October 17, 2017 3:37 PM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** eis for accessory dwelling units

To Whom it may concern,

It has come to my attention that the council is looking to change the zoning for single family residences. As a former home owner in Magnolia for 17 years I want to protest this zoning change and keep the current zoning laws intact. It is possible now to do additional living accommodations the way the code is now. By trying to change it to your proposal you would be destroying the fabric of the neighborhoods throughout Seattle. People should be able to live in a traditional quiet area if they so choose. I am supportive the ongoing upzones in targeted neighborhoods and I have been very involved in this process. It seems unnecessary to ruin our beautiful neighborhoods by allowing up to 3 separate units on one small plot of land.

Please keep our neighborhoods in tact and I request no changes to the current zoning.

Sincerely,

Lisa Power

**ADUEIS**

---

**From:** Louis Manuta <inlouof@verizon.net>  
**Sent:** Wednesday, October 18, 2017 1:46 PM  
**To:** ADUEIS  
**Subject:** Re: Comment on ADU and West Seattle Urban Village Proposed Changes

Thank you for the confirmation.

Just to clarify, in paragraph 4, I meant to state there are NOT enough bus only lanes.

Thanks.

Lou Manuta.

Sent from my Verizon iPhone

> On Oct 18, 2017, at 8:49 AM, ADUEIS <ADUEIS@seattle.gov> wrote:

>

> Louis,

>

> Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

>

> Best,

>

> Aly Pennucci & Nick Welch

>

> \* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)

>

> -----Original Message-----

> From: Louis Manuta [mailto:inlouof@verizon.net]

> Sent: Tuesday, October 17, 2017 7:53 PM

> To: ADUEIS <ADUEIS@seattle.gov>

> Subject: Comment on ADU and West Seattle Urban Village Proposed Changes

>

> I attended the open house at the High Point Community Center tonight and left written comments, but these issues are so important that I want to e-mail more detailed comments as well.

>

> Any time a community faces a major change as we are here to accommodate additional residents and to make housing more affordable, the following three things must exist in equal measure: competence, creativity, and credibility. All too often, one or more of these requirements has been lacking in Seattle's growth proposals. Now is no different.

>

> My wife and I relocated to West Seattle in July 2015 from NY, first renting an apartment and then purchasing a townhouse in the alley between 40th and 41st Avenues SW in May 2016 (4533A 40th Avenue SW). Even in this short period of time, we have seen big changes and on-going issues in our neighborhood and throughout the city. While NY has made more than it's share of mistakes with housing, roads, infrastructure, etc., Seattle as a new city should have

been looking at what works and what doesn't work in these older cities and make fewer mistakes. Unfortunately, I am not seeing that.

>

> Which brings me to tonight's Open House. I have attended several of these types of meetings over the past couple of years and it really, honestly appears as if the people behind the proposals have never been to the West Seattle Junction. It would be hypocritical of me to be opposed to increased ADUs as we live in a townhouse that was built in the former backyard of a single-family home. But to give us the false choice of supporting additional AADUs and DADUs only if we don't want there to be an off-street parking requirement, is plain wrong. There is a lack of off-street parking in the urban village right now and that is only going to get worse as the population increases. It is laughable to think that future residents will not need a car. That is a delusional position to take. Maybe you can take transit to work (I emphasize maybe —there aren't enough buses that run through West Seattle and there are enough bus only lanes), but what about other appointments and kids' after school commitments? Where do guests and visitors park? There needs to be additional options for those of us who support increased density but realize we need additional parking to go along with it.

>

> For the West Seattle urban village, the growth has been steady since we moved here. But, what about infrastructure? If there are requirements, for example, to increase sewer capacity when a single family lot all of a sudden has three townhouses in addition to the single-family house, I don't see it. We had a problem last year when the toilets in the 3 townhouses on our lot and the house all flushed at the same time. Several hundred dollars in repairs later, it became apparent that there was not a sufficient capacity increase when the townhouses were built about 14 years ago. We have the plumber's drawings to prove it. I'm sure we're not alone.

>

> Sewer, water, roads, transit, schools, green space — they all have to be increased when the density increases. It seems like an after thought here and that is plain wrong.

>

> In summary, I do not appreciate false choices when it comes to our home and our neighborhood. Knocking down single-family houses so that another apartment building can be constructed without adequate consideration for the impact on infrastructure is a mistake. I don't believe actions are matching up to policy goals. I agree that increased density will help with increased demand for housing, but unless these other issues are addressed at the same time, Seattle will no longer be a livable city.

>

> Thank you.

>

> Lou Manuta.

**ADUEIS**

---

**From:** Ron Sievers <rons@orangerecordings.com>  
**Sent:** Wednesday, October 18, 2017 2:25 PM  
**To:** ADUEIS  
**Subject:** Re: October OPCD Newsletter

I am all for AUDs. I also do not believe the own should need to occupy them. They should be available for rent to others. Bigger the better.. **Alternative 2!**

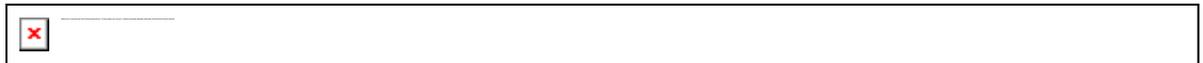
On 10/18/17 2:16 PM, The OPCD Team wrote:

OPCD's newsletter.

[View this email in your browser](#)



**OCTOBER 18, 2017**



## Your Input Needed on Accessory Dwelling Unit Environmental Review

The City of Seattle is conducting an environmental review process to study the effects of removing barriers to creating accessory dwelling units (ADUs) in single-family zones. ADUs include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs). The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of the study, and we want your input on what to consider as we explore allowing more ADUs in Seattle's neighborhoods.

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The City's proposal involves allowing both an in-law apartment and a backyard cottage on the same lot, removing the existing off-street parking and

owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, we're preparing an EIS to review the potential environmental impacts of this proposal.

During the scoping phase, you can help us determine the alternatives we'll study, potential environmental impacts to consider, and possible measures to avoid or reduce the effects of the proposal. Comments are due by 5:00 p.m. on November 1, 2017. You can give us your input in several ways:

- **online** at [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS)
- **by email** to [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- **by mail** to Aly Pennucci, City Council Central Staff, PO Box 34025 Seattle, WA 98124-4025
- **in person on** October 26, 2017, 6:00-7:30 p.m. at [Hale's Ales](#) (in the Palladium), 4301 Leary Way NW

[Learn More](#)



## Join Us to Discuss Comprehensive Plan Amendments

The Seattle Department of Neighborhoods will be hosting an open house to discuss Comprehensive Plan Amendments related to how we grow and build housing in Seattle. The City of Seattle is working to ensure that the language in existing Neighborhood Plans is consistent with the 2016 Comprehensive Plan and Mandatory Housing Affordability (MHA), a policy that would require developers to contribute to affordable housing. You will have a chance to review Neighborhood Plan language and help choose new language that is consistent with the City's updated vision and plan.

**Neighborhoods involved: Aurora-Licton Springs, Fremont, Northgate, Roosevelt, Wallingford**

[October 26](#)

6 - 7:30pm

Hales Brewery (in the Palladium)

4301 Leary Way NW, Seattle

[Learn More](#)

## Seattle Design Commission seeks new Commissioners

The Seattle Design Commission is recruiting to fill two upcoming vacancies on the Commission, one for a licensed Architect and the other for a licensed Professional Engineer. The recruitment closes on December 1 and both positions will start their two-year terms in March 2018.

Established in 1968, the Seattle Design Commission advises City officials on design excellence in City funded capital improvement projects, in the City right-of-way, or constructed with City funds. The Commission also advises the Mayor, City Council, and City departments on projects or policies that impact Seattle's public realm. You can see the scope of our work at [www.seattle.gov/designcommission](http://www.seattle.gov/designcommission).

The 10-member commission is comprised of architects, artists, urban designers, urban planners, landscape architects, civil engineers, a member-at-large, and one member from Get Engaged, the YMCA Young Civic Leaders Program. Commissioners are appointed by the Mayor and confirmed by the City Council.

[Learn More](#)

## Central Area Design Guidelines Begins Environmental Review

The Central Area Design Guidelines will guide future development to reflect the unique historical character of the Central Area community; retain the rich

characteristics valued by the community's long term residents as well as its new and future residents; and facilitate inclusive and equitable growth and development.

The creation of a Central Area Design Review District and Board will support equitable and inclusive community engagement and process specific for those most impacted by displacement, maximize the effectiveness of the Central Area Design Guidelines, and help guide future development to respond to the unique Central Area historical character and identity.

We have refined our Central Area Design Guidelines based on public input and are ready to move the legislation forward. On October 16, 2017, we published the State Environmental Policy Act (SEPA) Determination of Non-Significance for the draft legislation, draft Central Area Design Guidelines and a Director's Report. The public comment period will close on October 30, 2017.

[Find out more](#)



## **Mandatory Housing Affordability, new Arts & Cultural District coming to Uptown**

On Oct 11, Mayor Tim Burgess signed legislation to implement new zoning in Uptown that will generate an estimated 600 rent-restricted homes for low-income people, create new incentives for cultural spaces, and advance the vision of the Uptown Urban Design Framework. The mayor also signed legislation establishing the Uptown Arts and Cultural District and calling for an update to the Seattle Center Master Plan. The celebration at KEXP marked a great milestone for the Uptown community and capped an extensive public process that began in Nov 2013 to create a vibrant future for the Uptown Urban Center.

[Continue Reading](#)



## Save the Date: Capitol Hill Design Guidelines Open House

Capitol Hill is experiencing a phase of rapid growth. Since the neighborhood design guidelines were adopted in 2005, nearly 50 new building designs have gone through the Design Review program and received development permits. As the neighborhood continues to grow, the City of Seattle is teaming up with Capitol Hill Housing, the Capitol Hill EcoDistrict and local community members to update the existing Capitol Hill Neighborhood Design Guidelines, which will serve as a guide for future development throughout all areas within the Capitol Hill Urban Center. The new guidelines will define the qualities of architecture, urban design, and public space so that new buildings support and enhance the character of the existing community fabric.

**Thursday, November 16, 5:00 - 7:00 pm (brief presentation at 6:00 pm)**

**Pike/Pine Room of 12th Avenue Arts**

**1620 12th Avenue, 2nd Floor**

[Continue Reading](#)

## Mayor Burgess signs executive order to expand language access to City services

Mayor Tim Burgess has signed an [executive order](#) intended to increase the City's capacity to serve limited English proficient immigrant and refugee residents. Mayor Burgess issued the following statement:

“Seattle is a vibrant city because of our immigrants, and local government needs to expand our efforts to hear and speak with them in the languages in which they are most comfortable. We are a city of so many first languages, so today, with this Executive Order, I am directing all City departments to update and prioritize implementation of our Language Access Program,” said Mayor Burgess. “In their day-to-day lives, and in a crisis, Seattle’s foreign born and immigrant populations

deserve a city that can hear and speak to them. In a time of increased division and xenophobia, it is important that we stand firmly behind Seattle’s values and redouble our commitment to inclusivity and equity.”

According to 2010 US Census data, over one third of Seattle’s foreign-born households are linguistically isolated, with no one in the household 14 years or older who has English proficiency.



## Seattle-King County Immigrant Legal Defense Network services now available

[Traducción Española](#) | [dịch tiếng Việt](#) | [中文翻譯](#) | [한국어 번역](#)

The [Seattle-King County Immigrant Legal Defense Network \(LDN\)](#) provides legal aid and information to vulnerable immigrants and refugees. To qualify for FREE Legal Defense Network assistance, one must:

1. Be an immigrant in detention, facing deportation, or in danger of losing their immigration status;
2. Live or work in the City of Seattle or live in King County; AND
3. Have a household income below [200% of the federal poverty level](#).

Immigrants wanting to see if they are eligible for free legal services, should first call one of these community navigators:

- [Filipino Community of Seattle](#): (206) 280-8406
- [South Park Information and Resource Center](#): (206) 767-7445
- [West African Community Council \(WACC\)](#): (206) 349-0892

Unlike in criminal trials, individuals do not have a right to legal representation in civil immigration proceedings. However, studies have shown that people who were

represented in U.S. immigration court were up to ten times more likely to obtain relief. Legal services are provided by:

- [Northwest Immigrant Rights Project](#) and [Colectiva Legal del Pueblo](#) (for adults and families): **(206) 816-3870**
- [Kids in Need of Defense](#) (for unaccompanied children): **(206) 359-3266**

The Immigrant and Refugee Legal Defense Fund will continue to fund the LDN through to December 31, 2018.



Join us for an ice cream social. Chat with your neighbors, read the Georgetown Mobility Study, and learn about what the City is doing to address other community priorities. Families welcome!

The Duwamish Valley Program is working to advance environmental justice, address racial and neighborhood-level disparities, reduce health inequities, and create stronger economic pathways and opportunities in South Park and Georgetown. The program will seek to deliver coordinated investments that address City and community priorities, as well as build strong partnerships with the community and partners to support collective action.

As part of this effort, SDOT's Georgetown Mobility Study is evaluating street improvements to increase safety and health, and improve conditions for people walking, biking, and driving. The Georgetown community requested the study during the development of the Seattle Freight Master Plan.

---

**Join us:**

Wednesday, October 25

6:30 - 8:00pm

**[South Seattle College Georgetown Campus](#)**

Building C, Room C122 | 6737 Corson Ave S

---

For more information:

**Georgetown Mobility Study:** Diane Wiatr | [GeorgetownMobility@seattle.gov](mailto:GeorgetownMobility@seattle.gov)

**Duwamish Valley Program:** Alberto Rodriguez | [Alberto.Rodriguez@seattle.gov](mailto:Alberto.Rodriguez@seattle.gov)

## Seattle/King County Clinic Offers Free Medical, Dental, and Vision services

Healthcare organizations, civic agencies, non-profits, private businesses and volunteers from across the State of Washington are operating a giant free health clinic in KeyArena at Seattle Center **from October 26<sup>th</sup> to 29<sup>th</sup>**. The four-day volunteer-driven clinic provides a full range of free dental, vision and medical care to underserved and vulnerable populations in the region.

Visit the [patient information page](#) for more information or [volunteer](#) to serve those in need. Seattle Center Foundation relies on tax-deductible [donations](#) to help provide the necessary equipment, supplies, food and resources for the Seattle/King County Clinic.

[More Info](#)

## Upcoming Events

### **Design Commission Meeting**

October 19, 8:30am - 4:30pm, **Seattle City Hall**

### **Free Citizenship Clinic**

October 21, 10:00am, **Beacon United Methodist Church**

### **ADU Public Scope Meeting**

October 26, 6:00 - 7:30pm, **Hale's Ales (in the Palladium)**

**Lake City Neighborhood Alliance Meeting**

November 9, 6:30 - 8:30pm, **Lamb of God Church**

**Rainier Beach Action Coalition**

November 9, 6:30 - 8:30pm, **Neighborhood Health Clinic**

**More Events**



**Tim Burgess, Mayor**  
**Samuel Assefa, Director**

City Hall, 600 Fourth Ave, 5th Floor  
Seattle, WA 98104

*Copyright © 2017 Seattle Office of Planning and Community Development. All rights reserved.*  
You are receiving this email because you signed up to receive news updates for the City of Seattle's  
Office of Planning and Community Development.

**Our mailing address is:**

Seattle Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

[Add us to your address book](#)

Want to change how you receive these emails?  
You can [update your preferences](#) or [unsubscribe from this list](#)

**ADUEIS**

---

**From:** jillcrary@comcast.net  
**Sent:** Wednesday, October 18, 2017 2:45 PM  
**To:** ADUEIS  
**Subject:** ADU EIS scoping comment

I would like to see the added off-street parking space requirement removed from the current ADU language. It is an unfair and onerous requirement. I could remodel my very small single family house into a very large single family house - as many of my neighbors have done - and have 1 or 2 additional cars as a result of that remodel - as many of my neighbors have done - without any additional parking requirement.

But if I try to add a 800 sq ft detached ADU to compliment my small house (880 sq ft) on my 5,000 sq ft lot, I would have to create a driveway to do so. The parking area in front of my house has become the parking place of choice for my neighbors' additional cars, but I can't take advantage of my extra lot size without adding parking. This restriction stacks the deck against any greater density on my Phinney Ridge block and moves up the date when I will have no choice but to sell to a developer who will max out the lot size for another huge single family house, since houses have now passed the \$1M on my block. This is the story happening all over Seattle and will not advance any of our affordability goals.

I don't see how Seattle will ever affect the variety of housing choices needed just by the rezone in urban centers, urban villages and low-rise multiple zones. The total area of all those combined is too small to affect the level of chance needed. We have to make significant changes in leveraging single family areas into housing types that are affordable, or we are shutting down the possibility of home ownership to the next generation.

Thanks

**ADUEIS**

---

**From:** Richard Lunt <richardluntmachinery@msn.com>  
**Sent:** Wednesday, October 18, 2017 2:52 PM  
**To:** ADUEIS  
**Subject:** Comment on EIS on assessor dwelling units

Thank you for the opportunity to give input. I am strongly opposed to allowing both attached and detached units, especially without off street parking spaces in single family zones. I understand the need to create additional housing, but allowing one or the other type of unit, with off street parking, is sufficient. The regulation should also preclude the owner from AirBnBing, etc. the second unit to assure that the unit is used to address the housing crisis, and not to add to the vacation rental stock. One of the major factors in Seattle's attractiveness is the quality of its neighborhoods; the majority of neighborhoods have single or duplex homes. Many families want a residential experience. Unlike many other cities where single family homes are on very large lots, the majority of Seattle's homes are on much smaller lots. We have already addressed the issue of density many years ago. I have never heard anyone address that issue. It seems as if there is a "war" against single family home owners, characterizing us as rich elites who don't understand the current plight of newcomers to our city. That is not true..most of us vote for every housing and social services levy to support those struggling and to make our city a better place. Most of us have had regular jobs all our lives and are not part of the elite. We have saved and scrimped to be able to live in a quiet neighborhood. We are asking that the character of our neighborhoods be preserved; without us being vilified. The city has stated values of making neighborhoods safe for children and older adults and the proposed rezoning plan goes against that by putting too many cars on our streets. I feel like these comments are wasted because the City has already decided what it wants to do, but I felt it was important for just a "regular" single family homeowner to share the comments that I have heard from many of our neighbors.

Kathleen Southwick  
2563 10th West  
Seattle WA 98119

**ADUEIS**

---

**From:** Maggi Johnson <MJohnson@johnsonsoutherland.com>  
**Sent:** Wednesday, October 18, 2017 3:07 PM  
**To:** ADUEIS  
**Subject:** Energy code leniency?

A suggestion for something to consider as you study the impacts of ADUs: Should ADU's have to comply with the same energy code requirements as houses or could ADU's be "grandfathered in" if they are in a building that was originally built for another use or at an earlier time when the energy codes were more lenient.

We have a neighbor who would like to convert a building on their property into an ADU. It was permitted as an unheated studio and met the code when built. To bring it up to current code for insulation for a living space would be prohibitive, which is too bad because it would make a neat little housing unit for someone. Because a person living there would be living in such a small space, I wonder how their energy footprint would compare per person to someone living in a much bigger, better insulated house.

Thank you.

**Maggi Johnson, ASLA, LEED AP**  
Principal  
**Johnson+Southerland**

Phone: 206.723.8275 ext. 223  
3827B South Edmunds Street  
Seattle, WA 98118

<http://www.johnsonsoutherland.com>

**ADUEIS**

---

**From:** Michael R. Wolf <MichaelRWolf@att.net>  
**Sent:** Wednesday, October 18, 2017 3:17 PM  
**To:** ADUEIS  
**Subject:** Imbalance - Increasing pillow count without increasing park, bus, bike, and culture count

In the 17 years I've been in Ballard, the population has increased 50% as many lots have 2-6 times the number of pillows for people to sleep on at night.

The Ballard Bridge remains the same width.

Do the math!!!

We cannot single-car-and-pave ourselves out of this kind of 2X, 3X, and (for SLU) 50X population density increase. We need to think at levels beyond the single lot (DADU's and AADU's) and beyond the single car or some ratios get out of balance.

One of the great reasons to live in Ballard has been a WalkScore (and BikeScore) that rivals Manhattan. The BusScore isn't keeping pace.

Please don't approve more density if the infrastructure does not keep pace.

By infrastructure, I mean the kinds of physical limitations that typically prevent over-growth (water, sewer, electricity), but I want to make sure that the aesthetic, "spiritual", and "soft metrics" do not get eroded to decrease the livability, so let's keep a BusScore, ParkScore, TreeScore, OpenSpaceScore and CultureScore at the current (or increasing) levels.

I actually like that we are creating more density where I live instead of invading the suburbs and natural areas around this beautiful city. It means that the rural resources continue to add to my (weekend) quality of life. I'd like to make sure that my (daily) quality of life keeps pace. To that end, we need to plan longer term than next year, and to plan for bigger levels of scale than a particular plot. We need a long term plan that includes plot-, block-, neighborhood-, and city-level planning that doesn't let growth destroy the livability and quality of life that is attracting this growth.

Thanks,  
Michael Wolf

P.S. I'm in Ballard, and have seen a crane from my window for at least 5 consecutive years and have seen landscape be replaced by hardscape. Please don't export this imbalance to other neighborhoods. Let's learn from being unable to get a seat on a bus or have access to green space within a few blocks from our front door.

P.P.S. Related -- Lawns and trees are currently removed when density increases. I'd like to *\*require\** that all green space get *\*displaced\** to the roof instead of eliminated. This would create micro-parks at the dwelling level that would place less strain on the (not yet sufficient) parks-per-person ratios for pocket parks, and neighborhood parks.

--

Michael R. Wolf

MichaelRWolf@att.net - LinkedIn.com/in/MRWolf - +1-(206)-679-7941

All mammals learn by playing

**ADUEIS**

---

**From:** Sandy Kraus <sndkrs35@gmail.com>  
**Sent:** Wednesday, October 18, 2017 3:27 PM  
**To:** ADUEIS  
**Cc:** Sandy Kraus  
**Subject:** ADU input

Thank you for giving the citizens of Seattle a chance to have an input in this new proposed zoning change EIS. I don't have any positive things to say about the proposal. Before throwing out the existing zoning requirements OPCD should be looking at making minor changes to the code to help simplify the process for homeowners to add either an ADU. Only one ADU should be allowed per home and there should be a requirement that the owner must live in one or the other ADU. And off street parking should be required for each unit per lot.

Sandy Kraus

Here are a list of concerns that I have and which I think should be studied in the EIS:

1. Where will the occupants of these ADU's park? Given the scarcity of existing parking in Seattle in all areas including residential areas, potentially tripling the number of occupants in the single family neighborhoods this could be a big issue.
2. Many of our homes are old and our sewer and water systems are made for a single family situation but not for another extra living unit or two. Additionally, will the water and sewer systems be able to handle the extra load?
3. What about the extra electricity needed to operate 3 separate units per lot? How will that affect City Light?
4. Storm water runoff will also be an issue if additional structures will be built in our backyards which will reduce the amount of pervious surface in our yards and gardens resulting in additional runoff.
5. Water availability might also be an issue with hotter/dryer summers in Seattle. If we allow increased density in Seattle, will our existing water supply be able to provide enough drinking water for all of the residents? We got somewhat lucky this summer as we had a sufficient water reserve in the reservoirs but we might not be so lucky in the future. We need to look at climate change to see how this new proposal will fit into our new reality of climate.
6. There are single family neighborhoods that seem low density, but in reality they aren't. One case in point is the neighborhood where I live in on Portage Bay. Although we mostly have single family dwellings in this area, the houseboats along the south shore of Portage Bay create a "high density" area. This impact is made even more severe because there is very little parking for the houseboat owners who have to find parking along Fuhrman Ave E/Boyer Ave E and other side streets in the area. On top of that we are impacted by the proximity to the University of Washington just across the University Bridge from students, faculty and staff using our neighborhood as free University parking!
7. Traffic issues should increase with the increase in density. Thanks to Metro/King County, our neighborhood also lost the #25 bus which wound through Montlake, Portage Bay, Boylston St, Lakeview Blvd and eventually into downtown via Eastlake Ave E. Gone! We have the #49 bus but it is already very crowded and doesn't serve all of the areas that the #25 used to serve.

8. Affordability issues should also be addressed. If my single family home on a 3000 sq/ft lot can now have two additional units, then the value of my home just increased by quite a bit. If the City were to eliminate the requirement that the owner of the property must live in one of the units, then many single family homes in Seattle will soon be bought up by people who want to add these new properties to their rental portfolio.

9. This ADU proposal would have a strong impact on property taxes. Taxes would increase for all existing residential single family homes even if we didn't add new units as the new value would be determined by the "potential value". This would tend to drive lower income people out of Seattle to find property tax relief somewhere outside of the city. We would soon lose our middle class homeowners in Seattle.

## ADUEIS

---

**From:** Drew Collins <drewcoll@gmail.com>  
**Sent:** Wednesday, October 18, 2017 3:32 PM  
**To:** ADUEIS  
**Subject:** Adus

I totally support and encourage the allowance of ADUs across the city, without parking requirements, and streamlined design review.

Drew Collins  
Capitol Hill, Seattle, WA

## ADUEIS

---

**From:** Patricia DeVore <pattydandjoeyj@hotmail.com>  
**Sent:** Wednesday, October 18, 2017 5:18 PM  
**To:** ADUEIS  
**Subject:** Online form etc

First your online form for comments on accessory dwellings doesn't work. The error code is that the site can't be reached.

As for accessory dwellings either attached or detached I think it's a fantastic way to go to increase living spaces for those who need it. There are far too many homeless people on our streets and if these dwellings can provide homes they could also reduce the number of homeless.

Thank you for the opportunity to give our comments to you on this matter.

Sincerely,

Patty DeVore

Sent from my T-Mobile 4G LTE Device

## ADUEIS

---

**From:** Ann pot-staton <annpot@comcast.net>  
**Sent:** Wednesday, October 18, 2017 8:54 PM  
**To:** ADUEIS  
**Subject:** Tree units on single family home lots

This idea slapped on the whole city does not sound well thought out. It might work in certain areas, but not without some research.

I vote No as it now stands.

Sincerely  
Ann Pot-Staton  
6716 47th Place SW  
Seattle 98136

**ADUEIS**

---

**From:** Laurie Lohrer <laurielohrer@hotmail.com>  
**Sent:** Thursday, October 19, 2017 7:52 AM  
**To:** ADUEIS  
**Subject:** Comments for DADU EIS

We own a home in "single family" zoned district in Ballard. In 2013, the neighboring property owner constructed a DADU, located just 6' west property line, and close to full allowed 23' height restriction.

DADUs are exempt from density limits, sited a mere 10 feet from adjoining homes, require a single parking spot, and there are no mechanisms by which opposing neighbors can influence their design, location, nor are they granted the ability to veto or reject their construction.

The City's own website recommends that those building DADU's provide courtesy of advising neighborhood of their intent and confer on options. That never happened. The first signs were building permit posting and construction starting.

Here's the impact of ADU policy on our neighborhood: the average home on my block is 1,200 sq ft and situated on a 4,475 sq ft lot; 36% of the homes are less than 1,000sq for. As such, under current law, DADU's have the capacity to increase total developed square footage by 66% on my block.

Other negative impacts include loss of green space, nuisance issues, parking, noise, congestion, increased density, light pollution, animal control etc.

For example, the DADU next door casts a huge shadow from west, that we were forced to abandon the large garden we previously used to grow our produce. The property owner could easily have located the DADU site further west, which would have adjoined the west neighbor's unused parking area. However, that location apparently was less desirable to the DADU owner, as would have cast the shadow on their backyard, not ours.

Parking congestion has resulted from DADU inhabitants NOT using the narrow "off street" parking area, rather using the street. So at night, we all jockey for parking near our residences.

Finally, re environmental impact, without a major upgrade to our water treatment capacity, resulting increased density from ADU's (and huge condo building booms across the City ) WILL impact West Point's capacity to keep up with sewage treatment The city needs to remember 2016 when West Point overflowed and dumped raw sewage into Puget Sound and plan according!

Parking congestion, neighbor notification prior to project, upgraded water treatment facilities and impacts of density increases all need careful review before changes are made to City of Seattle current ADU policies.

Laurie Lohrer  
2847 NW 62nd St,  
Seattle WA 98107  
253-310-7135 cell

## ADUEIS

---

**From:** Joseph Woods <joseph@woodsdesignnw.com>  
**Sent:** Thursday, October 19, 2017 10:25 AM  
**To:** ADUEIS  
**Subject:** Comment on ADU Review

Hi there,

Not sure if this is the proper place to leave this idea, but thought it could have some environmental benefits. My thought is that most/all if the existing semi or un-finished basements in Seattle have ceiling heights that don't meet the current code minimum for new construction. It's my understanding that this limits the ability to create an ADU in a space with a 6'-8" ceiling (very common from what I've seen). I think you might look into loosening that requirement to give a little more flexibility to home owners who are considering a basement ADU. The environmental impact of this would be the allowance of extra density while minimizing the impact to lots and open space by utilizing some of these existing basements as apartment units.

Thanks for reading and best of luck with the EIS!  
Joseph Woods

[Woods design NW](#)  
440 Virginia St.  
Seattle, WA 98101  
ph: 206.229.7817

## ADUEIS

---

**From:** Klaus Kerl <klauskerl@gmail.com>  
**Sent:** Thursday, October 19, 2017 11:48 AM  
**To:** ADUEIS  
**Subject:** ADUEIS

Please add the option of allowing legal duplexes on all corner lots, plus an ADU.

This would help keep Seattle housing costs reasonable for years to come, as there must be thousands of available corner properties, with beautiful double street exposures and good access.

Klaus Kerl  
retired city planner (AICP).

**ADUEIS**

---

**From:** sarajane3h@comcast.net  
**Sent:** Thursday, October 19, 2017 1:48 PM  
**To:** ADUEIS  
**Subject:** Homeownership requirement

I want to call attention to the ADU DADU EIS scoping meeting that was held Tuesday night at High Point, because Nick Welch, the Planner in charge, said that his current proposal is \*no homeownership requirement\* at all.

This can only be a favor to developers and invites speculation, driving out homeowners. As a homeowner, I requested legislation to liberalize the regulations and make it easier for low-income seniors to create rental revenue to offset escalating property taxes.

There is no such thing as a mother-in-law apartment without homeownership. It is the personal relationship with a trusted tenant who shares your house that keeps the rent reasonable, instead of chasing the last dollar. Otherwise it's just a duplex. The homeownership requirement is the key to mother-in-law apartments creating naturally affordable housing, at no cost to the city.

Sarajane Siegfriedt

Sent from XFINITY Connect Application

**ADUEIS**

---

**From:** Ginnie Hance <hancegk@gmail.com>  
**Sent:** Thursday, October 19, 2017 2:57 PM  
**To:** ADUEIS  
**Subject:** ADUs, DADUs, and the EIS

**Thank you for considering the changes to the ADU/DADU laws.**

As a home owner/resident in the city of Seattle within the Morgan Junction Urban Village, I have long believed ADUs and DADU regulations were too tight. Requiring owner occupation and limiting the home to only one ADU or DADU not only puts undue restrictions on home owners, but the rules are inconsistent with other current house renting laws.

Current city law allows up to 8 non-related tenants with no parking restrictions to rent any single family home throughout the city of Seattle. How is this different than renting a home with one or two ADUs and a DADU? Shared vs separate kitchens/baths?

Updating the ADU/DADU restrictions will make rental laws more consistent, add to the housing inventory and help individual home owners rent parts of their home, or entire home for increased income. In our current housing crisis and rising cost of living in Seattle, changing the ADU and DADU restrictions is a simple fix that makes sense.

Please change these laws soon.

Thank you for your time and attention to this,

Ginnie Hance

Morgan Junction Urban Village home owner and landlord.

(I manage our family owned 33 unit apartment building with 4 retail spaces, two single family homes and two homes with ADUs - ours and my parents - all within the Morgan Junction Urban Village boundary)

206-718-5214

FYI Vancouver BC has, from its beginning has allowed ADUs and DADUs on all single family lots throughout the city. It's time for Seattle to catch up!

## ADUEIS

---

**From:** Susan George <seattlesue@msn.com>  
**Sent:** Friday, October 20, 2017 8:12 AM  
**To:** ADUEIS  
**Subject:** Think Broadview!

I'm all for increasing density in the Broadview area. The average lots are 8,000-15,000 w/ plenty of extra parking.

How do we help homeowners with increasing density w/o Destroying the neighborhood. How can we open the door and loosen restrictions but ensure integrity?

I look forward to your meetings in D 5 and would like to be a part of the Conversation.

Susan George

Sent from my iPhone. Sorry for any spelling errors and / or brevity!

206.696.6464

**ADUEIS**

---

**From:** Amy Roy <rtdamd@comcast.net>  
**Sent:** Friday, October 20, 2017 9:31 AM  
**To:** ADUEIS  
**Subject:** Proposed land use changes for ADUs

To City of Seattle City Council members:

I am strongly opposed to the proposed land use changes for ADUs in the city of Seattle, and particularly Alternative 2 proposals. I live in the Ballard Salmon Bay/ Sunset Hill neighborhood where there are already a number of 'backyard cottages" that are as large as the original dwelling and have significant negative impact on the community environment. I am experiencing an increasingly crowded street with a greater number of parked cars than I have ever seen before. One of the benefits of a single family home neighborhood is the presence of backyards where children can play, birds and wildlife can coexist with us and enhance our quality of life, and open space and greenery can help filter storm water runoff. Increasing buildings with impervious surfaces and subsequent increased toxic storm water runoff has a severe negative impact on the water quality of our region. The greater Ballard neighborhood has been dramatically changed with the building of multiple huge apartment and condo complexes and it is becoming more generic and anonymous, a very sad loss of what was a unique Seattle neighborhood that had contributed to what had made Seattle a desirable livable city.

Please do not make these negative changes to Seattle zoning laws and preserve our quality of life with maintaining green and open spaces.

Amy Delay  
3016 NW 61st Street  
Seattle, 98107  
[rtdamd@comcast.net](mailto:rtdamd@comcast.net)

## ADUEIS

---

**From:** Sidney Patten <sidpatten@comcast.net>  
**Sent:** Friday, October 20, 2017 10:52 AM  
**To:** ADUEIS  
**Subject:** Proposed Upzoning

Dear Aly Penucci, City Council Central Staff,

We strongly oppose the proposed up zoning of our single family neighborhoods. It will increase parking and traffic congestion, increase the neighborhood density and diminish the

privacy and sense of community we have so much enjoyed. We ask you to make NO changes in the existing zoning regulations, particularly on Queen Anne where we have been

residents for 44 years.

Thank you.

Sidney & Irene Patten  
1621 11th Ave. West  
Seattle 98119

**ADUEIS**

---

**From:** Beth Day <bethday@gmail.com>  
**Sent:** Friday, October 20, 2017 6:00 PM  
**To:** ADUEIS  
**Subject:** ADU Public Scoping

Hi! I am writing in support of increasing ADUs in Single Family Zoning.

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One

of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Thanks!  
-Beth Day

•

**ADUEIS**

---

**From:** vpardee <vpardee@aol.com>  
**Sent:** Saturday, October 21, 2017 9:30 AM  
**To:** ADUEIS  
**Subject:** Re: West Seattle

I would like to be involved in a citizen advisory capacity. Please keep me posted.

Sincerely,  
Vicki Pardee  
[vpardee@aol.com](mailto:vpardee@aol.com)  
206/769-5556

On Oct 21, 2017, at 8:25 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Vicki,

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** vpardee [<mailto:vpardee@aol.com>]  
**Sent:** Friday, October 20, 2017 2:22 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Fwd: West Seattle

Please consider the following as my  
Scoping Comment Form

Vicki Pardee  
[Vpardee@aol.com](mailto:Vpardee@aol.com)

Begin forwarded message:

**From:** vpardee <[vpardee@aol.com](mailto:vpardee@aol.com)>  
**Date:** October 20, 2017 at 2:19:17 PM PDT  
**To:** [jon@electjongrant.com](mailto:jon@electjongrant.com)  
**Subject:** West Seattle

Thank you for coming to WS last night. I liked your positions on developers. Once upon a time, we may have needed them. To get things done quickly & right. That set the bar. Now there is no doubt about if a development will succeed, but HOW we want SEATTLE to look once they are done. And gone.

I hope you are aware of the Seattle 2030 vision for Seattle...it appears city departments have any idea what the others are doing. Doesn't sound like a vision to me.

These Urban Villages: Alaska Junction for example, allowed 2foot tall signage to scream at us every time we return to our "Urban Village."

I would really like some time to explain how WS density growth-being able to add ADU&DADU's is the only way many can afford to stay where they bought homes. And that City owned property - lack of management and infrastructure (drainage / slope retention), threaten adjacent property owners; note landslides originating on City owned land...and the lawsuits lost by City afterwards.

Seattle is going to allow in-fill development. In R-1 zones. In many areas of the city, these properties are bound on one side by City owned land. And WS, Magnolia, Beacon Hill...

Are all surrounded by City owned steep slope. If we do not MANAGE it (drainage/restoration) it becomes a liability to every adjacent property owner. These landslides are happening all the time now. There is too much run off!

Thank You,

Vicki Pardee

[Vpardee@aol.com](mailto:Vpardee@aol.com)

**ADUEIS**

---

**From:** Maureen Brinck-Lund <molundia@gmail.com>  
**Sent:** Saturday, October 21, 2017 3:53 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Unit rules changes

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrade non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

- Buffer detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restrict maximum FAR to make tear-downs/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

**ADUEIS**

---

**From:** Monica Johnson <svbaloo@mac.com>  
**Sent:** Saturday, October 21, 2017 4:39 PM  
**To:** ADUEIS  
**Subject:** ADU & DADU

## To Whom it May Concern,

I am wholeheartedly in favor of allowing more options as outlined below. In my work as a realtor I often wished that the rules allowed more flexibility, it would have allowed many of my customers and single people the option of staying in the homes they had lived in for so many years, and also to more easily afford their purchases. This absolutely makes sense as we transition to a more dense and vibrant city.

Best regards,  
Monica Johnson

Are there additional topics or concerns that you would like to see addressed in this EIS?

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

Do you have other comments or suggestions related to the scope of the EIS?

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new

cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## ADUEIS

---

**From:** Bryan Kirschner <contact@bryankirschner.me>  
**Sent:** Sunday, October 22, 2017 5:59 PM  
**To:** ADUEIS  
**Cc:** O'Brien, Mike; Herbold, Lisa; Johnson, Rob; Gonzalez, Lorena  
**Subject:** Accessory Dwelling Units EIS: Scoping Comment

We would like to offer comments on the Accessory Dwelling Unit Environmental Impact Statement (“ADU EIS”) in three parts.

First, we would like to state categorically that we believe “Alternative 2” is superior to “Alternative 1 (No Action).” We believe “No Action” is unresponsive to the need for more affordable housing options, the urgency of doing our part as a city to fight climate change, and issues of class and racial equity.

Second, we would like to express our support for ten suggestions offered by an organization we support, [More Options for Accessory Residences](#) (MOAR). These are incorporated document as Appendix 1.

While we fortunate enough not to feel pressured by the rising value of our home and its concomitant property taxes, as homeowners we can readily see ways that the changes represented by Alternative 2 and the further suggestions offered by MOAR might be helpful if our circumstances were different.

Finally, we would like to offer specific comments and recommendations considering conditions in our neighborhood, and the city’s stated commitments to the environment, equity, and affordability.

1. The Washington State Department of Ecology’s [“SEPA Handbook”](#) states “The primary purpose of an EIS is to provide an impartial discussion of significant environmental impacts, and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts.”

The city’s [request for comment](#) states “The City of Seattle is proposing to change regulations in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADUs) in single-family zones.”

We suggest the city expand the scope of the EIS to include an “Alternative 3” assessing the environmental impacts of choosing to continue to enforces a definition of “single family zones” as predominantly “Single Family 5,000,” “Single Family 7,200” or “Single Family 9,600” on more than 18,000 acres of city land. In our area of Wallingford, as in many older neighborhoods, most lots are smaller. In our case, we live on a 2,500SF lot, between a neighbor on 4,000SF lot and a neighbor on a 1,500SF lot. Clearly, smaller lots can be compatible with single family zoning, since

places like the one we live in exist. *Prima facie*, attaching smaller pieces of expensive city land to each home will be more affordable to each individual household and more transit-friendly.

The city ought to provide an impartial discussion of the environmental consequence of enforcing large-lot minimums and the potential benefits of relaxing them.

2. We suggest the city include in its assessment of “Potential impacts to availability of on-street parking” a -based inquiry into “parking slack.” By that I mean the on- and off-street capacity that exists but is underutilized. For example: we live in an area currently zoned single family; 12 homes front the street on our block. As a rough qualitative assessment, we have at least 12 underutilized off-street spaces, calculated by subtracting owners’ vehicles from off-street potentially usable spaces if we assume all garages are used for cars and driveways would be filled to capacity. (This might require parking in tandem, but lots of people including ourselves do that all the time.) In addition, we park a car in front of our driveway apron, which is technically illegal but ought not to be and could certainly be managed through some form of parking sticker: that would effectively add more on-street capacity if the owners of properties with curb-cuts vacated other street space.

3. We suggest the city include in its assessment of the “Potential elimination of existing housing,” “Housing & Socioeconomics,” and “Housing affordability” a strong empirical focus on the affordability of “one home, on a big lot” to median income and below households, people of color, and recent immigrants. By way of example, in our area (Northwest Wallingford) all the single family detached homes with values on Zillow of \$700,000 or less were either small (ranging from 550SF to 1140SF) on small lots (ranging from 2000SF to 5775SF) or both (details are listed in Appendix 2). The implication that ought to be explored is that in many areas “one home on a big lot” is out of reach as an affordable option; subdividing homes, lots, or both is the only path toward affordability.

4. Some claim 20% or more of single family homes in Seattle are rentals. If this is true, we suggest this is dispositive as a reason to eliminate an “owner occupancy” requirement. By definition these homes are not owner-occupied, so lack of owner occupancy does not seem to be a problem. And if this trend continues, statistically one in five ADUs or DADUs (or both) would wind up sitting idle and empty over time. Finally, in view of the “Feasibility of development scenario” consideration we believe it is a significant public benefit if for-profit builders or small landlords are able to try to make a living addressing the market of people who can only afford a home in an ADU, a DADU, or a single family home only by subsidizing their mortgage with rent from one or both.

5. Scientific consensus is that exposure to some pollutants such as Nitrogen Dioxide (NO<sub>2</sub>) materially declines after 50-500 meters from major roadways and commercial centers, with substantial evidence for 150m-300m being an important buffer (see for example [Review of evidence on health aspects of air pollution – REVIHAAP Project: Technical Report](#)). Seattle’s current zoning scheme largely “zones in” multi-family housing along arterial roads and “zones them out” of land more than 300m from arterials and commercial centers. The EIS ought to assess the impact of “No Action” versus greater liberalization of ADUs and DADUs in providing housing options in more healthful areas (e.g., greater than 300m from arterials and commercial centers) affordable to lower income and minority households.

Thank you for your consideration and your hard work.

Bryan Kirschner & Holly Ferguson

1608 N 49<sup>th</sup> St, Seattle, Washington 98103 (Northwest Wallingford)

[contact@bryankirschner.me](mailto:contact@bryankirschner.me) or 206-295-5880

## Appendix 1

Source: Beyond Backyard Cottages: 10 ideas to address Seattle's housing shortage, by Matt Hutchins, resending More Options for Accessory Residences (MOAR), via Medium, referenced October 22, 2017.

1. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
2. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
5. Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
6. Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

9. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
10. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

## Appendix 2

Zillow single family detached house values in Wallingford from 50<sup>th</sup> to north side of 45<sup>th</sup>, Stone Way N to Wallingford Avenue; all values we were able to find below \$700,000, week of October 15-21, 2017:

Desc	SF	Lot	Zillow Estimated Price (000\$)
1BR/1BA	550	5000	647
1BR/1BA	660	2401	636
3BR/1BA	750	5775	577
2BR/1BA	720	2000	591
2BR/1BA	840	2583	681
2BR/1BA	920	3500	659
3BR/1.5BA	1140	2880	649

**ADUEIS**

---

**From:** Dhruv Agarwal <dhruvybaby@gmail.com>  
**Sent:** Sunday, October 22, 2017 10:52 PM  
**To:** ADUEIS  
**Subject:** Importance of ADU's

I am a property owner in Seattle. I think that there is a big opportunity for the city to allow affordable housing through common sense reform of ADU regulations to allow non owner occupied properties to have up to 2 ADU's

Many times the basements, attics, back half of houses make excellent low rent options. They allow properties to be much better utilized and since it is within existing properties with only some new construction, the rent on these units is much less expensive.

I would like to see the max sq footage on ADU's raised to 1200 sq ft since it allows for 3 bedroom units which are sorely needed for families in Seattle and which new apartment buildings do not provide enough of.

Thanks  
Dhruv

--

949-231-7742 (Cell)

## ADUEIS

---

**From:** Christopher Kerl [mailto:chris.kerl@comcast.net]  
**Sent:** Sunday, October 22, 2017 1:12 PM  
**To:** ADUEIS@seattle.gov  
**Cc:** Christopher Kerl <chris.kerl@comcast.net>  
**Subject:** In support of greater density -- Please allow ADUs and DADUs in SF zones

Hi,

I am a resident and homeowner living in the Portage Bay neighborhood, and I would like to voice my support for legislation allowing for greater density in Seattle single-family zones, specifically permitting both ADUs and DADUs on lots like mine.

I believe it is a reasonable solution to address the increased demand for housing in the city while balancing concerns about maintaining neighborhood character. I am in fact already building a DADU on my alley, which will be an attractive and valuable addition to the neighborhood—see picture attached.

I think both ADUs and DADUs up to at least 1000 sf (and even larger on big lots perhaps) should be allowed with up to 12-14 residents total. Further, I do not believe there should be any owner-occupancy restrictions on such developments, but if there are concerns about investors possibly adversely impacting the market it may be reasonable to put limits on such ownership—perhaps up to a maximum of five such properties per single owner.

Allowing for ADUs and DADUs will give homeowners greater flexibility in handling housing concerns of aging parents and children, as well as providing additional financial support to families, and will also create more needed housing for Seattle.

Thank you,

Christopher Kerl

Christopher Kerl | Attorney at Law | C.A. Kerl PLLC  
2366 Eastlake Avenue East, Suite 228 | Seattle, WA 98102

Tel: (206) 328-8500 | Fax: (206) 328-5364  
Email: [kerl@kerl-law.com](mailto:kerl@kerl-law.com) | Website: [www.kerl-law.com](http://www.kerl-law.com)

CONFIDENTIALITY NOTICE: This e-mail and any attachments thereto are intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby notified any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you receive this email in error, please immediately notify the sender by reply to this email and permanently delete the original copy and any copy of any e-mail, and any printout thereof.

## ADUEIS

---

**From:** Paul Shukovsky <paulshukovsky@hotmail.com>  
**Sent:** Monday, October 23, 2017 1:22 PM  
**To:** ADUEIS  
**Subject:** ADU EIS scoping comment

Please consider the impact of requiring parking for the construction of AADU on elderly and handicapped homeowners who need to build an AADU to accommodate the creation of accessible living space in an otherwise un-accessible home.

Current parking requirements for homes without alleys behind them make it very difficult if not impossible to convert an existing attached garage into a AADU.

Thanks for you careful consideration of this important public policy issue to address current discriminatory zoning regs toward disabled people and the elderly.

Regards,

Paul Shukovsky

## ADUEIS

---

**From:** Leslie Hoge <leslie@hogedesign.biz>  
**Sent:** Monday, October 23, 2017 1:46 PM  
**To:** ADUEIS  
**Subject:** Re: Unable to comment on the website form

Hi Aly and Nick,

Thanks for looking into that. I am on a Mac and use Safari, but maybe I wrote too much?! Anyhow, your email address was easy to find.

Would there be any point in printing out the email and snail mailing it to you as well?

Thank you,  
Leslie  
206.384.7969  
-----

On Oct 23, 2017, at 1:42 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Leslie,

Thank you for emailing your comments. I'm sorry you had some trouble with the online comment form. We will look into the issue you described.

We'll consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** Leslie Hoge [<mailto:leslie@hogedesign.biz>]  
**Sent:** Monday, October 23, 2017 1:35 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Unable to comment on the website form

Hi,

Your website says that "Cannot contact reCAPTCHA. Check your connection and try again."  
I've tried three times.

I've read the proposed changes to the Accessory Dwelling Units via the EIS and have comments. They're listed below. Thank you for your consideration.

-----  
**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. Vegetation/trees/plants/permeable surfaces and issues related to drainage and sewer systems. Potential for our neighborhoods to turn into concrete jungles.
2. Cost increases of properties with two additional units--and cost of property tax increases to the rest of the neighborhood.

-----  
**Do you have other comments or suggestions related to the scope of the EIS?**

Yes, many. I'm alarmed at the weakening of the existing regulations--neighborhoods will lose their individual characteristics and will become overly dense.

**COST:** I understand that Seattle needs to increase density, but you're handing our neighborhoods to profit-driven developers with these changes. How will an average person ever be able to buy a house in a single family neighborhood? It's bad enough now, but we normal people will be outbid by a developer every time.

**QUALITY OF LIFE:** We live in single family neighborhoods because we like the space, the trees, the yards, the relative quiet and many other reasons; I know that we need to compromise on density as the city grows, but you also need to protect and consider those who live in these neighborhoods.

**INFRASTRUCTURE FIRST!** Think about putting in infrastructure upgrades before adding this much density. I think you're approaching this problem backwards. Lay the groundwork first. Right now, streets are congested, parking can be challenging, the bus can be packed with standing room only.

See notes below, line item by line item:

**#2: keep parking requirement.** If half the homes on our block expanded to the maximum allowable density, we would be unable to park there any more.

**#3: Keep owner occupancy and monitor it.** Otherwise, you're handing developers a bonanza. Again, normal people won't be able to afford to buy a house because developers will outbid them every time. And developers tend not to care at all about a neighborhood (witness the giant generic boxes everywhere--those sure don't create more affordable housing; what they replace was Seattle-style affordable). Developers will max out all size limitations and will use cheaper materials. They'll downgrade the neighborhoods with no regard to others who live and own there.

**#4: Keep as is at 4,000 sf.** 3200 is too small and will impact neighbors.

**#5: Keep size limits as they are:** 1000 ADU including storage & garage; 800 DADU (which is larger than my first house). Otherwise, you're impacting neighbors' privacy and violating the overall scale and feel of a given single family neighborhood.

**#6: Keep existing height** to protect neighbors from intrusiveness.

**#8: Keep existing coverage.** Again, for neighbors but also we need green space, plants and permeable surfaces for our physical and mental health, plus the sewer system won't be as overrun if it's all hard surface.

**#10: No exceptions for height...**again to maintain some sense of neighborhood.

**#11: Keep the limit of 8 per lot.** Twelve people on a 3,200 sf lot with no parking? That will have terrible impact on any neighborhood. We don't live on Greek row at the university for a reason. Plus it's hard enough now to get a seat on the Metro. Even adding 6 people to half of the properties on my street

will add about 80 people to my block. The impact to streets—for parking and driving—to metro capacity, to water, sewer and garbage will be huge and untenable.

Thank you,  
Leslie Hoge  
206.384.7969

-----

**ADUEIS**

---

**From:** Farmer, LaKecia  
**Sent:** Monday, October 23, 2017 3:23 PM  
**To:** Pennucci, Aly  
**Subject:** FW: ADU & DADU EIS comments

ADU/DADU EIS comments.

**LaKecia Farmer**

Legislative Aide to Councilmember Mike O'Brien  
[Seattle City Council](#)  
 206-684-8800

Follow Mike on:      

[Sign Up for Mike's E-Newsletter](#)

*Note that all messages are subject to public disclosure*

---

**From:** Leslie Hoge [mailto:leslie@hogedesign.biz]  
**Sent:** Monday, October 23, 2017 1:36 PM  
**To:** O'Brien, Mike <Mike.OBrien@seattle.gov>  
**Subject:** ADU & DADU EIS comments

Hi,

Your website says that "Cannot contact reCAPTCHA. Check your connection and try again."  
 I've tried three times.

I've read the proposed changes to the Accessory Dwelling Units via the EIS and have comments. They're listed below. Thank you for your consideration.

-----  
**Are there additional topics or concerns that you would like to see addressed in this EIS?**

1. Vegetation/trees/plants/permeable surfaces and issues related to drainage and sewer systems. Potential for our neighborhoods to turn into concrete jungles.
2. Cost increases of properties with two additional units--and cost of property tax increases to the rest of the neighborhood.

-----  
**Do you have other comments or suggestions related to the scope of the EIS?**

Yes, many. I'm alarmed at the weakening of the existing regulations--neighborhoods will lose their individual characteristics and will become overly dense.

COST: I understand that Seattle needs to increase density, but you're handing our neighborhoods to profit-driven developers with these changes. How will an average person ever be able to buy a house in a single

family neighborhood? It's bad enough now, but we normal people will be outbid by a developer every time.

QUALITY OF LIFE: We live in single family neighborhoods because we like the space, the trees, the yards, the relative quiet and many other reasons; I know that we need to compromise on density as the city grows, but you also need to protect and consider those who live in these neighborhoods.

INFRASTRUCTURE FIRST! Think about putting in infrastructure upgrades before adding this much density. I think you're approaching this problem backwards. Lay the groundwork first. Right now, streets are congested, parking can be challenging, the bus can be packed with standing room only.

See notes below, line item by line item:

#2: keep parking requirement. If half the homes on our block expanded to the maximum allowable density, we would be unable to park there any more.

#3. Keep owner occupancy and monitor it. Otherwise, you're handing developers a bonanza. Again, normal people won't be able to afford to buy a house because developers will outbid them every time. And developers tend not to care at all about a neighborhood (witness the giant generic boxes everywhere--those sure don't create more affordable housing; what they replace was Seattle-style affordable). Developers will max out all size limitations and will use cheaper materials. They'll downgrade the neighborhoods with no regard to others who live and own there.

#4. Keep as is at 4,000 sf. 3200 is too small and will impact neighbors.

#5. Keep size limits as they are: 1000 ADU including storage & garage; 800 DADU (which is larger than my first house). Otherwise, you're impacting neighbors' privacy and violating the overall scale and feel of a given single family neighborhood.

#6: Keep existing height to protect neighbors from intrusiveness.

#8: Keep existing coverage. Again, for neighbors but also we need green space, plants and permeable surfaces for our physical and mental health, plus the sewer system won't be as overrun if it's all hard surface.

#10: No exceptions for height...again to maintain some sense of neighborhood.

#11: Keep the limit of 8 per lot. Twelve people on a 3,200 sf lot with no parking? That will have terrible impact on any neighborhood. We don't live on Greek row at the university for a reason. Plus it's hard enough now to get a seat on the Metro. Even adding 6 people to half of the properties on my street will add about 80 people to my block. The impact to streets—for parking and driving—to metro capacity, to water, sewer and garbage will be huge and untenable.

Thank you,  
Leslie Hoge  
206.384.7969

-----  
Hoge Design  
206.384.7969  
-----

## ADUEIS

---

**From:** Chaitanya Sharma <natehc1984@gmail.com>  
**Sent:** Monday, October 23, 2017 7:13 PM  
**To:** ADUEIS  
**Subject:** Writing in support of alternative 2

Hi there,

I wanted to express my support for alternative 2 (the "action") alternative, in regards to encouraging ADUs in Seattle. I have no doubt that a small number of people will be very loud in their opposition to this. But loud people don't necessarily represent the majority. Please make a decision in the best interests of the majority, not in tune with a small number of very angry rich people who want to maintain the exclusivity of their neighborhood.

Thanks.

--

**Chaitanya Sharma (Chetan)**

## ADUEIS

---

**From:** Austin Valeske <avaleske@gmail.com>  
**Sent:** Tuesday, October 24, 2017 1:17 AM  
**To:** ADUEIS  
**Subject:** Additional Comments on DADU EIS

OPCD,

I'm submitting this as a comment on the DADU EIS

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to

share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Thank you,  
Austin Valeske

## ADUEIS

---

**From:** Steve & Paula <albright@seanet.com>  
**Sent:** Tuesday, October 24, 2017 8:52 AM  
**To:** ADUEIS  
**Cc:** LEG\_CouncilMembers  
**Subject:** Comment on Councilmember O'Brien's Initiative to Allow Every Single-Family Home to Become a 3 Unit/Triplex

Attention: Aly Pennucci

We vote a strong "NO" to Councilmember Mike O'Brien's initiative to trade in single-family dwelling status into a free-for-all no-holds-barred zoning on Queen Anne, and in Seattle. We are opposed to this initiative.

We live here for a reason: quality of life.

This proposal merits a NO vote.

Sincerely,

Steven J Albright and Paula Cipolla

2616 2<sup>nd</sup> Ave North  
Seattle, WA 98109  
206-282-5063

**ADUEIS**

---

**From:** Brian Rulifson <rulifsonb@asme.org> on behalf of brgovmail@rulifson.com  
**Sent:** Tuesday, October 24, 2017 11:46 AM  
**To:** ADUEIS  
**Subject:** RE: EIS Scoping responses

Hello Aly Pennucci & Nick Welch,

Unless you have some evidence that the below mentioned public records are not yet public records, I'd like access to them immediately.

The legislature finds that the rights of citizens to observe the actions of their public officials and to have timely access to public records are the underpinnings of democracy and are essential for meaningful citizen participation in the democratic process. All too often, however, violations of the requirements of the public records act and the open public meetings act by public officials and agencies result in citizens being denied this important information and materials to which they are legally entitled. Such violations are often the result of inadvertent error or a lack of knowledge on the part of officials and agencies regarding their legal duties to the public pursuant to these acts. Also, whether due to error or ignorance, violations of the public records act and open public meetings act are very costly for state and local governments, both in terms of litigation expenses and administrative costs. The legislature also finds that the implementation of simple, cost-effective training programs will greatly increase the likelihood that public officials and agencies will better serve the public by improving citizen access to public records and encouraging public participation in governmental deliberations. Such improvements in public service will, in turn, enhance the public's trust in its government and result in significant cost savings by reducing the number of violations of the public records act and open public meetings act.

I'm certain that Councilmember O'Brien, in his training required by RCW 42.56.150 knows about the RCW 42.56.520 prompt responses required. (<http://app.leg.wa.gov/RCW/default.aspx?cite=42.56.520>)

I'll admit to you that this is the first time I've read through that section of the RCW, but it certainly appears that the information I've requested is within the scope of a timely access request. It is, after all, public data gathered and administered with public money and does not fall into a privileged category.

I look forward to hearing from you.

--Brian Rulifson  
Resident of Fremont

PS> I'm no lawyer. I'm pretty much assuming that the city council is either bound by state law in this matter, or has an equivalent set of disclosure laws on the books. :-)

---

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Tuesday, October 24, 2017 8:52 AM  
**To:** brgovmail@rulifson.com  
**Subject:** RE: EIS Scoping responses

Hi Brian –

Thank you for the email. We will publish all comments received as an attachment to the scoping report after the comment period closes.

Best,

Aly Pennucci & Nick Welch

---

**From:** Brian Rulifson [<mailto:rulifsonb@asme.org>] **On Behalf Of** [brgovmail@rulifson.com](mailto:brgovmail@rulifson.com)  
**Sent:** Wednesday, October 18, 2017 10:08 AM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** EIS Scoping responses

Hello City,

I'd like to see the in-progress results from the EIS Scoping survey that you're taking on google forms.

While I would prefer to view these public records as a spreadsheet, shared as read-only to the email address [brgovmail@rulifson.com](mailto:brgovmail@rulifson.com), having access to or being sent a csv of the file would also be ok.

Here's a link to how to do those things, just to make sure you can see how easy it is.

<https://support.google.com/docs/answer/139706?hl=en>

Thank you!

--Brian Rulifson  
[brgovmail@rulifson.com](mailto:brgovmail@rulifson.com)  
Resident of Fremont

**ADUEIS**

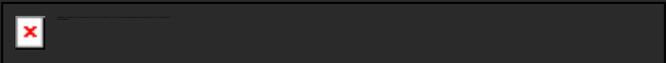
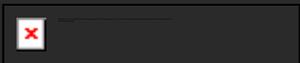
---

**From:** Victoria N. McCormick <homelessgrouch007@gmail.com>  
**Sent:** Tuesday, October 24, 2017 6:33 PM  
**To:** suburbanpoverty@gmail.com; alex.kingsbury@globe.com  
**Cc:** ADUEIS; nbrodeur@seattletimes.com  
**Subject:** Fwd: Local Headlines: How the graying of America is stretching local tax dollars

The one about the elderly is a good one.  
Not everyone makes enough to put money aside for retirement.

----- Forwarded message -----

From: "The Washington Post" <[email@washingtonpost.com](mailto:email@washingtonpost.com)>  
Date: Oct 24, 2017 4:30 AM  
Subject: Local Headlines: How the graying of America is stretching local tax dollars  
To: <[homelessgrouch007@gmail.com](mailto:homelessgrouch007@gmail.com)>  
Cc:



Essential news for the Greater Washington area



# How the graying of America is stretching local tax dollars

Rising demand for services for the elderly is taking a toll on local governments that must also tend to schools, roads, parks and other needs.

By Antonio Olivo • [Read more »](#)



---

## Bad news for Metro riders: Arcing insulators are back with a vengeance



Metro says water infiltration led to high number of arcing events this past summer.

By **Martine Powers** • [Read more »](#)

---

## A year together as a married couple, ended by a bizarre accident



An out-of-control SUV hit the D.C. residents as they stood by their bicycles in Dewey Beach, police say

By **Paul Duggan** • [Read more »](#)

---

## Eagles make the big plays, pull away from Redskins on 'Monday Night Football'



Carson Wentz outshines Kirk Cousins with his arm and his legs as Philadelphia wins key NFC East showdown, 34-24

By **Liz Clarke** • [Read more »](#)

---

## Suspect in deadly Md. workplace shooting will first face trial in Del.



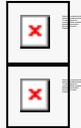
Radee Labeeb Prince, 37, allegedly shot five co-workers in Maryland, killing three and injuring two, before driving to his home state of Delaware and shooting an acquaintance.

By **Ellie Silverman** • [Read more »](#)

---

ADVERTISEMENT





Perspective

### **This Marine notified families when a loved one was killed. His advice: Use common sense.**



Gerald Merna spent a year as a casualty notification officer. He knows it takes humility, humanity and heart to do the job.

**By Petula Dvorak • [Read more »](#)**

### **Washington Nationals TV analyst charged with assault in fracas at his Va. home**



Former major leaguer Ray Knight was arrested early Sunday after a fight with an acquaintance, police said.

**By Justin Jouvenal and Chelsea Janes • [Read more »](#)**

### **Northam touts 212k weekend door knocks in Virginia — while DNC was fretting about race**



Democratic gubernatorial campaign says field operations are better than Clinton, McAuliffe at a similar point

**By Fenit Nirappil • [Read more »](#)**

### **Gillespie goes after Northam with TV ad on felon rights restoration**



The Republican candidate for Virginia governor is using law-and-order themes, and critics call it fearmongering.

**By Laura Vozzella and Fenit Nirappil • [Read more »](#)**

---

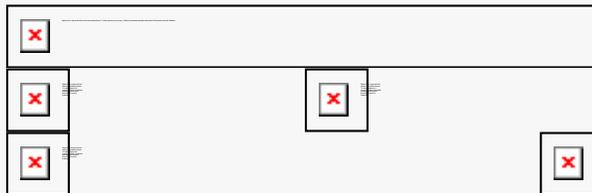
## Early showers then warm this afternoon, and cooler temperatures roll in tonight



Starting tomorrow, mornings will be chilly and highs will only peak in the 60s.

By Matt Rogers • [Read more »](#)

ADVERTISEMENT



---

## Five die in D.C.-area traffic incidents in three days

Two pedestrians and a motorcyclist were among those killed.

By Justin Wm. Moyer and Lynh Bui • [Read more »](#)

---

## Man who ran naked from woman's home charged with attempted rape, robbery



Khary Edwards, 23, broke into a Camp Springs home and attempted to sexually assault a woman

By Lynh Bui • [Read more »](#)

---

## Virginia schools chief to retire



Superintendent of Public Instruction Steven Staples will depart at the end of the year.

By Debbie Truong • [Read more »](#)

## Swastika spray-painted on school sign in Prince William County

'I couldn't make sense out of it,' said the school's executive director and founder.

By Sarah Larimer • [Read more »](#)

### Recommended for you



### Get the Going Out Guide newsletter

What to do and where to go in the Washington area, in your inbox twice a week.

[Sign Up »](#)

Share Local Headlines:  Twitter  Facebook

Trouble reading? [Click here](#) to view in your browser.

You received this email because you signed up for Local Headlines or because it is included in your subscription. For additional free newsletters or to manage your newsletters, [click here](#).

We respect your [privacy](#). If you believe that this email has been sent to you in error or you no longer wish to receive email from The Washington Post, [click here](#). [Contact us](#) for help.

©2017 The Washington Post, [1301 K St NW, Washington DC 20071](#)



...

## ADUEIS

---

**From:** Evelyn E Dial <dialophone@gmail.com>  
**Sent:** Wednesday, October 25, 2017 8:01 AM  
**To:** ADUEIS; O'Brien, Mike; Herbold, Lisa; Johnson, Rob; Gonzalez, Lorena  
**Subject:** Addressing Seattle's housing shortage

Hi there,

My name is Evelyn Dial and I am a Seattle resident and renter. I am very concerned about housing affordability in Seattle and my family's ability to stay in our home and neighborhood. In my view, modifying the regulations on ADUs and DADUs in Seattle would be a great first step to addressing the housing shortage in our city. With that in mind, here is a list of proposed changes put forward by the group More Options for Accessory Residences (MOAR). Thanks for taking the time to look them over.

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Sincerely,  
Evelyn Dial

--

Evelyn Elsbeth Dial

**ADUEIS**

---

**From:** nicole nicolaisen <n\_nicolaisen@yahoo.com>  
**Sent:** Wednesday, October 25, 2017 8:17 AM  
**To:** ADUEIS  
**Subject:** DADU feedback

To whom it concerns,

I would like to add my comments to this DADU issue as a homeowner in West Seattle. We currently own a home with a detached garage totaling more than 800sq feet. We would like to convert part of it into an apartment for rental and future place for our parents, which would solve two challenges for us. With the current rules, it seems like we would be unable to do this, as the existing garage is larger than 800sq ft. I am a proponent for the allowance of 1000 sq feet spaces for this reason. As an alternative, which wasn't on the list, is if the existing garage is over 800sq feet, why not allow part of the space to be converted to maximum size (800-850) but leave the rest of the garage in its original size. In our neighborhood, there is plenty of street parking, as most homes have driveways where owners park their cars.

I am a huge advocate for affordable rent in Seattle as I have lived here since 1992 and am a WA state native.

I never had to worry about cost of rent when I was younger as it was always affordable, even if I had to have a room-mate. We are fortunate to have a home that was purchased before the market went totally crazy and became unattainable to people like us, who have never made more than the median income, in fact, we have been well below the average wage for Seattle, but still manage to budget and exist in Seattle.

To allow these changes for homeowners, who don't make 6 figures, would be a huge opportunity. For people like us, this would be much needed extra income that would allow us to stay in this city. In addition, this would add so many more affordable spaces for renters who desperately need them.

Thank you for listening.

Sincerely,

Nicole Nicolaisen

[Be the change you wish to see in the world - Ghandi](#)

Reflexology information:  
[www.west-seattle-reflexology.com](http://www.west-seattle-reflexology.com)

## ADUEIS

---

**From:** Erin Menser <emmenser@gmail.com>  
**Sent:** Wednesday, October 25, 2017 6:01 PM  
**To:** ADUEIS  
**Subject:** ADU EIS

I am writing to let you know that I believe that any rezoning should include an extremely thorough review of all impacts that would be resultant from such changes. In addition, I believe that all Seattleites should be thoroughly informed on the results of this impact study, so that they can make informed consent or dissent.

In addition I want to point out that this decision will effect over 300,000 households in Seattle and would be the single largest change in zoning for the history of Seattle. To allow such an event to go unexamined is extraordinarily ignorant and a decision that would leave many people, myself included, feeling as if the city does not have its citizens interests in mind.

Thank you,  
Erin Menser

Sent from my iPhone

## ADUEIS

---

**From:** Judy Bendich <jebendich@comcast.net>  
**Sent:** Wednesday, October 25, 2017 9:23 PM  
**To:** ADUEIS  
**Subject:** Comments about proposed DADus and ADUs

Dear Person:

I am commenting on the proposal to change regulations in the Land Use Code to make it easier to build accessory dwelling units in single-family zones throughout the City of Seattle.

1. The two public meetings the City scheduled to discuss this issue were in the south end on October 17 at High Point Community Center in West Seattle, and one is scheduled October 26 at Hale's Brewery in Fremont. These take place in the middle of the week in the evening at very limited locales with limited public transportation access. It will be hardly surprising that many communities do not show up and that many people do not even know about this proposal. The public notice is inadequate.
2. Assuming there were such units, not addressed are what regulations will be in place to assure that the landlord does not discriminate on the basis of race, ethnicity, religion, sex and sexual identity, families with children, persons with disabilities, and socio-economic status. What enforcement regulations will be in place?
3. What regulations will be in place to assure these units are not simply air-bnbs with short-stay, rapid turnover clientele?
4. The owner-occupied requirement should not be eliminated. This assures that there is a real homeowner who lives on site with a vested interest in maintaining the property and assuring that the tenant is complying with reasonable neighborliness, such as noise levels or not throwing garbage everywhere; this assures that a neighborhood be a real neighborhood rather than mega-corporate-absentee property managers.
5. The rental of these units must be to long-term *bona fide* tenants (not absentees or quick turn-overs) to prevent short-term air-bnb rentals.
6. The whole premise of loosening up housing density standards in single family areas, and the premise of HALA, is to increase housing opportunities for "affordable" housing. But that is not what this proposal does. Here, there is no *quid pro quo*. The City seeks to increase density, eliminate parking requirements, increase height of the buildings, but gives nothing in return to the neighborhood except an opportunity for the property owner to make an extra buck. These rental units must meet Mandatory Housing Affordability (MHA) - open and accessible to people with low income and limited means. This should not be simply another opportunity for get-rich schemes by the property owner or developer, charging as much as possible, and cramming as many people as possible into the units. The City needs an enforcement unit to assure the units are affordable and remain so. The only exception would be for units occupied by the homeowner's immediate family members (*real* mother-in-law apartments). Once the family member has vacated, the unit must be affordable and should be subject to other requirements discussed in these comments.
7. The units must not exceed the height of the principal dwelling and must not cast a shadow on adjacent properties. We Seattlites get little enough sunshine as it is during the fall, winter and early spring. Taking sunshine away diminishes the property values and property uses for adjacent home owners.

8. There is no discussion in the materials the City provided, nor any assessment by the City, of the strain and impacts on current infrastructure on a neighborhood by neighborhood basis. For example, the sewer line in my neighborhood is over 100 years old. A small part of it disintegrated in the last few years, and it took the City four months to replace 90 feet of pipe during which time it closed down the street, destroyed abutting property while jackhammering to remove the pavement, etc. etc. The City simply did not have adequate SPU personnel to promptly fix the sewer line. With an aging infrastructure and increased density such problems will occur with greater frequency, and the City does not currently have the resources to deal with these problems. Added housing will only increase the problems. The City has not adequately assessed this issue.
9. Assuming some of these units can actually accommodate families, what is the future impact on schools, and other services? Due to variability, impact needs to be determined on a neighborhood by neighborhood basis. The City has not assessed this issue.
10. With respect to any home owner who decides to build such units, adequate notice should be provided to the local community (at a minimum a five-block circumference). The home owner should be required to provide the proposed building specifications with adequate time and opportunity for the local community to object. And, there needs to be a process for objections and appeal to a neutral person, such as a hearing examiner.
11. Once the unit is built, there needs to be a process to assure that all the criteria described above continue to be met. And there needs to be a mechanism for the neighborhood to participate in that process.

Sincerely,

Judith and Arnold Bendich

1754 NE 62nd Street  
Seattle, WA 98115  
(206) 525-5914

**ADUEIS**

---

**From:** Denise Beard <dkbeard@comcast.net>  
**Sent:** Wednesday, October 25, 2017 10:02 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units EIS

**Importance:** High

Dear Aly Pennucci,

I am writing to express my strong disagreement to the change in regulations to remove barriers to to the creation of Accessory Dwellings in single Family Zones, which effectively wipes out the single Family Zoning.

I am especially appalled by the City's proposal to eliminate the owner occupancy requirement. Any one can see that all this will do is encourage developers & non local people to buy up single family properties as they are put up for sale as speculators & investors. Any one also can see clearly that these developers would charge market rates & above market rates ( in order to recoup their investment).

for these new units.

I can see the side that believes that individual owners who wanted to build an ADU on their property ( while living there), might be willing to do so & might offer to rent at somewhat lower than market rate, though I think it is naive to believe that they also would not be seeking to recoup the money they invested in building a housing unit. I know I would, as the cost to build one of these would be prohibitive for me unless I could be assured I could charge enough to pay back my costs & make some kind of profit. Lets's be honest, the vast majority of people are not going to spend in the neighborhood of a quarter of a million dollars out of the goodness of their hearts & essentially act as a non profit. I can totally understand why landlords would expect to be fairly compensated for their investment. And non resident developers would be STRICTLY doing this to make a profit. Period.

The ONLY ones who will benefit from this up zone are the developers & speculators. As always.....

There are a variety of other reasons why I oppose this proposal.

1. Parking requirements: Developers & most City Leaders are pushing the fallacy that millennials & the newcomers to the city as well as many other city residents do not drive or own cars in order to promote their own agendas.

One developer on QA ( trying to push a non conforming multi family project in a SFZ & in a Historically Designated Building) is using this as part of his sales tools, that people driving cars is going the way of the horse & buggy. So, he is not planing to provide enough off street parking spaces as units. Seriously?

This is disingenuous at best. In 2014, 64,376 new drivers licenses were issued in King County. In January & February of 2015, 10,616 licenses were issued to newcomers. I think we can all agree that the vast majority of these newcomers were likely millennials coming for jobs. Hmmm, seems that they are all coming from wherever they came from & are bringing their cars. They might not drive them much once they arrive ( due to horrific traffic & lack of parking) so it is highly likely those new cars stay parked...somewhere. Probably on the street or in the garages developers have provided & should be providing with their new multi family projects. To add more living units to Single Family Neighborhoods will only add to the congestion, danger on those narrow streets ( with cars parked all up & down both sides) to pedestrians.

2. We have Urban Village Designations in this city, until those areas all across the city are maxed out in terms of density it is wrong to eliminate SFZ. Those Urban Village designations are near services, mass transit so all new development should go there.

3. As a life long Seattle resident who recently retired ( not by choice, I was laid off, Ageism is alive & well) my husband & worked our you know whats off to buy our first house in the city. We were well into our 30's & in 1987 scrimped & borrowed a down payment from my in laws to get into our first home... 750 sq feet. We brown bagged lunch for 30 years, we did not every go out from lattes unless it was a special occasion such as a co workers birthday or going away, did not take vacation, etc, etc, etc in order to achieve the dream of home ownership in a safe, single family neighborhood, Queen Anne, which is where I lived in college, is where my aunt & Grandma once lived. We traded up twice to be in our current house ( 1400 sq feet, built in 1901 & desperately in need of a major remodel) , where we have lived nearly 21 years. We love our neighborhood, we cherish our smallish but lovely back yard, where we can enjoy trees, nature & PRIVACY in the middle of the city & where our 2 dogs can have a place to play. We should not be vilified because we want to keep our yard, the character of our neighborhood, would like to be able to park near our home so when we unload groceries we are not packing them from blocks away. We do not want be living cheek by jowl with hordes of other people. Why do you think the experts all say that parks, nature & green space is so important for mental health? Because when you pack people in like sardines with no privacy, it is not healthy. I might also add, that we struck a contract with the city when we bought. We made our decision based on the fact that this was a SFZ & over the years we certainly have paid the price of that in our ever rising property taxes. Now the city wants to renege on that contract.

4. We are growing very weary of having only the needs of the city's newcomers be considered. It's one thing to balance needs, but the city only cares about the newly arriving tech workers ( which is the reason low income people are being pushed out of affordable housing, there has been zero planning on the city's part to deal with the out of control growth.) | Instead, the older, retired & mostly white SF homeowners are being vilified, being called NIMBY, racist & blamed for the current housing problem.

We did nothing to create this mess & many of us "old timers" feel we are paying a very high price. If the city wants us to leave due to escalating property taxes & loss of quality of life, then be prepared for that. We are the people who created these great neighborhoods that all the new arrivals are flocking to. So much for all the so called diversity the city & others are calling for. Young highly paid tech workers & the homeless are the only 2 groups the city seems inclined to want to help. I feel as a lifelong resident that I am unwanted & unwelcome in my own city AND it's somehow my fault that the city through it's lack of planning & greed has become unaffordable to many & there is a housing shortage.

I am dismayed that the city is still trying to ram this up zone through & greatly fear what it will do the the quality of life in this city. Strong neighborhoods are what make a city great & livable.

Sincerely,  
Denise Beard  
1532 7th Ave W  
Seattle, WA 98119

**ADUEIS**

---

**From:** Jeannie Hale <jeannie.hale@outlook.com>  
**Sent:** Thursday, October 26, 2017 11:48 AM  
**To:** ADUEIS  
**Cc:** Colleen McAleer (billandlin@aol.com); Burgess, Tim; Johnson, Rob; Herbold, Lisa; Harrell, Bruce; Bagshaw, Sally; Gonzalez, Lorena; Harris-Talley, Kirsten; Juarez, Debora; O'Brien, Mike; Sawant, Kshama  
**Subject:** ADUs & DADUs  
**Attachments:** LCC7113DADU and ADU comment LTR October 2017.doc

Dear Aly,

Attached and pasted below are scoping comments from the Laurelhurst Community Club (LCC) and the ADU/DADU issue.

Colleen and Jeannie  
LCC

October 26, 2017

Aly Pennucci  
Legislative Department  
P.O. Box 34025  
Seattle, WA 98124-4025

Re: Comments on Changes for Detached and Unattached Accessory Dwelling Units

Dear Ms. Pennucci:

The Laurelhurst Community Club (LCC) offers the following environmental scoping comments on the proposed changes to regulations in the Land Use Code removing restrictions on accessory dwelling and detached accessory dwelling units (ADUs and DADUs). We support the “no action” alternative or development of a third alternative that would more adequately preserve and protect single family neighborhoods. The current proposal would essentially duplex or triplex single-family neighborhoods with no assurance that affordable housing would be created.

The Laurelhurst neighborhood was developed with many less than standard size lots and before two cars and garages became the norm. Most of our streets are narrow. We are located adjacent to two major institutions. We find we must continually work to maintain the residential character of the neighborhood, minimize the impacts of traffic, continually work on parking issues, and keep the stress of urban living down to a healthful level. The changes proposed at this time threaten to decrease the quality of our living environment. Neighbors are already experiencing the increased pressures from units now permitted.

Single-family homes should not be allowed to have both an ADU and a DADU. Alternative 2 would allow a single lot to have both an ADU and a DADU. This raises many issues that must be studied in the environmental impact statement (EIS), including loss of privacy to adjacent property owners, parking issues, shading caused by the DADU and loss of trees, vegetation and the ability of neighbors to garden on their own property.

Parking requirement of one space off street for each dwelling unit must be retained. The EIS should include a thorough study of parking availability in single-family neighborhoods including the history of the city granting parking waivers under the current code. Despite the boost in transit hours from Metro, bike lane additions, street cars with limited routes, and the new operation of Sound Transit's Light Rail service, Seattle is not at all equipped to eliminate cars for transportation. Witness the gridlock from South Lake Union that occurs daily, gridlocking I-5.

Family wage earners need their cars to drop off kids at school and daycare, run to various job sites, and stop at the grocery store on the way. With nowhere to park their vehicles without a required off-street parking spot, Seattle's single-family neighborhood streets will be reduced to one lane for through-passage or residents may end of parking blocks away while hauling in groceries or assisting a disabled family member into the home. In Laurelhurst, for example, 42nd Avenue NE is impossible to drive through, except in one direction because of vehicles lining each side. Wallingford, Capitol Hill, Fremont and Queen Anne are also experiencing the same overflow of cars. Adding dwelling units without off street parking will make this worse for existing homeowners, and impossible for small businesses throughout them, to attract customers. No parking means no stopping to shop or attend a restaurant.

Require owner occupancy. The EIS should analyze the many issues raised by eliminating this requirement. The home with an ADU and a DADU, plus the principal home would essentially be a commercial venture, rather than single-family zoned. Should the zoning then be changed to neighborhood commercial? Or, should the city consider upzoning certain areas? LCC does not support these approaches, but it seems as if the City is trying to do this in an underhanded manner and the issues should be studied. Transient, short term occupants for quick cash defeat the premise of increasing affordable, permanent residences—another related issue to study in the EIS.

With owners on the premises, there is "skin in the game" for having some good neighbor relationships with tidier maintenance, reasonable noise, and not just absentee landlords. In contrast with absentee landlords, homeowners in residence can be expected to have an immediate, active interest in who rents these extra units, and are more likely to work to ensure that the impacts which result from this increase in the density of development will be manageable. We need that assurance of owner commitment firmly in the Code.

Minimum lot size should not be decreased, for DADUs. The existing code allows for a lot as small as 4000 square feet to build a "cottage". Reducing the lot size coverage to allow for 40% coverage results in a loss of privacy, and will wipe out trees and plants and light for adjacent properties. The EIS should explore these issues. Other cities such as Santa Cruz and Boulder require 6,000 square feet for backyard cottages, 6000-8500 in Denver and 10,000 in Lexington, MA, and Mukilteo. These areas are also rapidly adding population growth, but are using a reasonable formula in adding more to the built environment.

Open back yards provide extra breathing room for those residents with kitchen gardens, and a place for their children to exercise and explore nature in their yard. Allowing too much built structure in the single-

family lot zones creates a “back door” opportunity for developers who have no stake in its outcome, except profitability, and these added accessory units cannot be reversed, once built.

The 1,000-maximum square footage should include garages and storage area and square footage for DADUs should not be increased from 800 to 1,000 square feet. The EIS should study how many garages and storage areas could or already have been converted to accessory units. Would exclusion of these areas allow creation of an additional accessory unit? Storage areas should be defined. Do they include linen closets and kitchen cabinets? Larger DADUs raise issues regarding privacy of adjacent neighbors and should be explored in the EIS.

The maximum height of DADUs should not be increased by one to three feet. Currently heights range from 15 to 23 feet depending on lot width. It’s possible that an extra three feet could mean a second story on a DADU. The EIS should explore this issue and include the height resulting from pitched rooflines. Particular attention should be paid to the privacy of adjacent neighbors, view lines, and light for gardens, trees and plants which are vital to a healthy urban environment.

Rear lot coverage limits should not be increased from 40 to 60 percent: This raises issues such as those mentioned in changes to height limits and minimum lot size increases and should be studied in the EIS. Destruction of tree canopy is also an issue for study in the EIS. The City of Seattle signed an Urban Bird Treaty agreement on May 22, 2017. With that commitment, the City must protect the habitat of wildlife saving the trees and greenery we have, by preventing lot coverage within the built environment.

The EIS should study the privacy impact of allowing DADU entrances on any façade. Currently, entrances cannot face the nearest side or rear lot line unless the lot line abuts and alley or other public right-of-way. This approach provides some protection to adjacent neighbors.

The number of unrelated people allowed to live on a single-family lot should not be increased from 8 to 12 and other options should be explored. The EIS should examine the impacts of both 8 and 12 unrelated people living on a single-family lot. Both numbers are too high and create maintenance issues, excess noise and lack of parking. Other jurisdictions limit the number to 5 or 6 unrelated people and the EIS should study these options.

The EIS must address the affordability issue for lower and middle-income families. ADUs and DADUs do not solve the issue. These accessory units require financing and bank loans just like any new house, and few lower income families qualify for a mortgage. It is a false assumption that adding more structures on single family lots does anything for housing the working class, but rather just gives homeowners a way to flip their back yards into another profit center for renters or student housing. Even if these units are rented, they are expensive to build, and rents would be high, so they do not add to the affordable housing stock.

Displacement impacts and the impacts on existing housing, the potential elimination of housing and destruction of our tree canopy require study in the EIS.

We appreciate the opportunity to provide environmental scoping comments.

Sincerely,

Colleen McAleer, Vice President

Jeannie Hale, President

3137 West Laurelhurst Drive NE  
Seattle, Washington 98105  
206-525-0219  
[billandlin@aol.com](mailto:billandlin@aol.com)

3425 West Laurelhurst Drive NE  
Seattle, Washington 98105  
206-525-5135  
[jeannie.hale@outlook.com](mailto:jeannie.hale@outlook.com)

cc: Mayor Tim Burgess and Members of the Seattle City Council

**ADUEIS**

---

**From:** Ronald Chase <rdchase1@yahoo.com>  
**Sent:** Thursday, October 26, 2017 12:13 PM  
**To:** ADUEIS  
**Subject:** Comments on EIS

### Comments of ADU Proposal EIS

A proposal to further loosen already loose zoning (compared to other major US cities) in what are supposedly single family zoned neighborhoods should not be decided by a simple vote of the city council. A major flaw, perhaps the major flaw in the Councilmember O'Brien proposal is that it is proposed city wide. A more reasonable and democratic way to look at zoning in single family neighborhoods would be by a vote of property owners in those neighborhoods, perhaps by council member districts. My impression from discussions with friends who live in my and other Seattle neighborhoods is that no one is in favor of this proposal; that it is something being pushed by investors and developers and city government ideologues.

EIS: Any increase in density, particularly in the form of construction of backyard cottages on very small lots would unavoidably change the lives of neighbors in both an aesthetic sense and in the practical sense of overcrowding. Such crowding is likely to cause discord among neighbors, related to noise, parking, and lack of control of how the property is used (in the case of absentee owners, prohibited now but unwisely permitted under O'Brien's proposal. The other face of discord among neighbors is increased isolation of individuals involved.

Another environmental concern is the increased possibility of landslides and run off from storms that can result from reducing the land area and vegetation that help absorb water. Few of Seattle's neighborhoods are built on flat ground. The EIS needs to include a thorough assessment of watercourses, including seasonal springs, and how such watercourses would be affected by overbuilding in existing neighborhoods.

As to the scope of the EIS, an option should be included that tightens the existing zoning rather than loosening it; for example, increasing the lot size on which a backyard cottage can be built to 4500 or 5000 square feet, rather than reducing it to 3200 square feet, and limiting the height of any such building to less than the height of the existing structure.

From a personal standpoint, if the small house next to me was sold to a developer who builds on it a triplex, that structure would change the character of the entire block. People have chosen to invest time and money to create a place to raise families and or to live their retirement years in neighborhoods that contain people of all ages. My neighborhood is one of those. The zoning changes proposed by O'Brien would slowly but surely destroy such neighborhoods (which is possibly the long term goal of those proposing these changes). In the process, a home that could be affordable to a family would be replaced by triplexes, each one of which would be more expensive to buy than the original home. This is not theory; it has happened in other cities and is happening now in Seattle.

Ron Chase

## ADUEIS

---

**From:** christine yokan <christine.yokan@gmail.com>  
**Sent:** Thursday, October 26, 2017 2:45 PM  
**To:** ADUEIS  
**Subject:** EIS ADU/ DADU legislation

Aly Penuchi  
 Council Central Staff

Dear Ms. Pennucci:

I am writing concerning the EIS scope for the proposed ADU/DADU legislation and neighborhood densification. I am an owner of a single family house with a registered ADU in Seattle. Although I would benefit financially from the opportunity to develop or sell my property for development as three units, I am strongly opposed to the proposed changes in the ADU/DADU legislation.

***It is unacceptable that this proposal is being considered before the City has made any serious effort to facilitate the addition of ADU and DADU housing under the existing regulations that protect neighborhoods.*** The proposed changes would dramatically, adversely, and irreversibly alter the character of the neighborhoods which make Seattle a desirable place for families and residents of all ages. They would cause faster gentrification; destroy existing affordable housing stock; dislocate longtime residents; erode support for community amenities; and degrade the environment.

I urge you to consider the following in the EIS process:

- 1) An assessment of the ***transition of property ownership from owner-occupant to non-resident investor and institutional capital pools over time and the impacts of that change***, including the displacement and elective relocation of current residents to areas outside of Seattle.
- 2) An assessment of the ***loss of existing housing stock and the impact on the cost of available housing***. If this legislation passes, substantial numbers of single family dwellings, including with ADUs, will be torn down and replaced with multiple units that are significantly more expensive per square foot. This will *reduce* the number of dwellings suitable for families.
- 3) An assessment of the ***impact of increased parking density on the displacement of mobility-limited individuals and families with children***. This change would force seniors and residents who cannot walk many blocks to public transportation to move out of their homes. This is already occurring in my neighborhood; residents of new apartment buildings in the University District that lack parking bring their cars from over a mile away and leave them unattended and illegally parked for weeks, impeding seniors and young families from going about their daily activities.
- 4) An assessment of ***the likely increase in the cost of single family homes*** that will result from making every property a potential multi-plex development. Reducing the supply of single family homes will drive up the cost of home ownership, not make it more affordable. Increases in property taxes driven by the increase in property values will further dislocate residents.
- 5) An ***assessment of additional costs to the City from the loss of homeowners voluntarily contributions to parks and community amenities***. Many homeowners in my neighborhood contribute time and financial resources to maintain

our neighborhood park and view these contributions as long term investments in our community. A transition to non-resident ownership will mean a loss of similar resources all over the city.

6) An assessment of the **increased traffic danger, injury and loss of life, and impedance of emergency vehicles from worsening overcrowded street parking**. Streets in many single family neighborhoods have unmarked intersections and heavy parking on both sides. They are so crowded that traffic moves in a single lane and must be prepared to yield. The assessment should be required to include the number of cars that will be added to streets and the impact on traffic, emergency vehicle mobility, and resident and driver safety.

7) An assessment of the **dangers that additional lot coverage, building sizes and a substantially greater number of residents per property pose to existing houses and infrastructure**, particularly in neighborhoods with hills, substantial underground water (streams), older sewer systems, deteriorating roads and alleys, and proximity to bodies of water.

8) Assessment of the potential **loss of existing ADUs**. Existing legislation provides protections to owners of principal residences who rent ADUs, particularly with regard to tenant deposits, screening, etc. These protections would likely be removed as the ADU/ DADU market transitions to non-owner occupied ownership. Loss of these protections would cause owner occupants to return the ADU areas of their homes to personal use, resulting in loss of existing housing.

9) An assessment of the risks and obstacles that presently discourage owners of single family houses from developing ADUs or DADUs and a plan for how the City could encourage development under the existing ADU/ DADU requirements.

**The City should not expend any resources to consider a radical change in zoning before a serious effort is undertaken to facilitate the development of additional housing under the existing ADU and DADU regulations. The existing regulations already balance maintaining neighborhood character and avoiding adverse impacts with the need for new housing.** Steps such as streamlining and assisting owners with permitting, allowing standardized ADU/DADU plans that meet current regulations, working with lenders to develop financing options, and simplifying rental regulations for owner-occupied properties could facilitate ADU and DADU development without bringing about wholesale and destructive changes to Seattle neighborhoods.

Thank you for consideration of my comments.

Christine Yokan

**ADUEIS**

---

**From:** h <nobhillnorth@aol.com>  
**Sent:** Thursday, October 26, 2017 3:34 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units EIS

As you know, this second proposed legislation follows an earlier attempt to pass it with a totally inadequate EIS and without the opportunity for public comment. Given the opportunity now, I have several thoughts regarding its efficacy.

Seattle's overcrowding situation is intolerable on so many levels. Adding to it by allowing three residences per property will only increase the misery. Seattle's neighborhoods aren't equipped with the infrastructure to support the population increase. With all of these additional residences, the city will need to build and staff more fire stations, more police stations, more schools and more hospitals. My neighborhood was built in the 18<sup>th</sup>-19<sup>th</sup> centuries. Most of the infrastructure has not changed since that time. These multi-family residence properties would seriously overtax the existing services (e.g. water, sewer, electricity, gas, phone, cable and web service). Even newer neighborhoods would have their services seriously stressed, as they weren't built for that kind of increase either. The character of all our neighborhoods will permanently change to a conglomerate of eclectic architecture and poor design crammed into smaller spaces (Seattle's current 4,000 sf allowance is already the smallest in the country). In the proposed legislation, boarding houses would also be allowed causing an even greater impact on the community.

Parking has spiraled out of control and tripling residential allowances without providing even nominal additional parking will encourage illegal parking putting people and property at even greater risk. Too many parked cars will block vision, block traffic and block emergency vehicles resulting in a greater number of injuries and deaths. How will emergency vehicles access these 'backyard cottages' when the home provides an effective barricade?

Traffic will go from really bad to nearly impossible, especially since the mass transit system isn't expected to be complete for another twenty years. If a mainline route is blocked, surface streets would no longer be an advantage and the city would be in gridlock. The traditional neighborhood is dying. A more fitting reference would be the "Capital Hill Colony", the "Ballard Hive" or the West Seattle Warren. There will be no such thing as a 'quiet neighborhood'. Privacy will be non-existent as you stare into your 'backyard neighbor's' living room (or they into yours). If sixty percent of a property has structures, how much will be allowed for ingress/egress? There won't be any trees or garden space left.

With today's wanton greed, removing property ownership requirements will breed rampant speculative development, affordable housing displacement and single-family neighborhood conversion removing all things good about our neighborhoods.

The city owns a great many vacant properties where more affordable, permanent housing can be built along with the infrastructure to support it. Some of these properties are a safety hazard and need to be rebuilt. Most are within a reasonable distance from Seattle. Yes, it would be expensive but the sale of one could fund the improvements of another. I urge you to take a look at some more reasonable options before condemning us all to a miserable, overcrowded and unsafe city.

Berta Nicol-Blades

**ADUEIS**

---

**From:** DAVID C SUTHERLAND <davelors@msn.com>  
**Sent:** Thursday, October 26, 2017 4:12 PM  
**To:** ADUEIS  
**Subject:** Re: zoning changes

I am very opposed to an accessory dwelling that takes away any existing yard/open space especially in small lots. We all need some open space. Seattle does not have enough parks now and there is no open space left to build new parks. People with families (children) need some yard space or is all this talk about having families live here a bunch of lies. Who are we building this city for - a lot of young single types? I like Portland's idea of having some open space/park within a half mile of residential areas. Seattle seems to think we can all live like rats in stacked cages.

I am also very opposed to removing existing off street parking and owner occupancy requirements. Many people still need their cars especially if they have children. When and if we ever get enough transit that works for everybody, then we can talk about no cars. I think owner occupancy is somewhat important to help prevent renter slums.

Loretta Sutherland  
1816 Federal Ave. E, Seattle  
206-329-8335

## ADUEIS

---

**From:** dxberger@aol.com  
**Sent:** Thursday, October 26, 2017 4:23 PM  
**To:** ADUEIS  
**Subject:** Opposed to Mike O'Brien's suggestion re: 3 units on each housing lot

The present backyard cottage/ADU rule is fine and should NOT be changed. In fact, it would be great to encourage more ADUs and back yard cottages. The proposed rule from Mike O'Brien is an invitation to speculators and others who are not invested as citizens in this city.

Respectfully,  
Deborah Berger

**ADUEIS**

---

**From:** Levy, Susie  
**Sent:** Thursday, October 26, 2017 5:38 PM  
**To:** Pennucci, Aly  
**Subject:** FW: off Street parking for Accessory Dwelling Units

**From:** Andrew Kidde [mailto:akandrew37@gmail.com]  
**Sent:** Thursday, October 26, 2017 1:53 PM  
**To:** Herbold, Lisa <Lisa.Herbold@seattle.gov>; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Burgess, Tim <Tim.Burgess@Seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>  
**Subject:** off Street parking for Accessory Dwelling Units

Dear Councilmembers,

I am writing to urge you to change the City's Land Use code by eliminating the off-street parking requirement for Accessory Dwelling Units (ADUs) and Detached Accessory Dwelling Units (DADUs). The City is launching an EIS process in anticipation of this decision.

Requiring off street parking for ADUs adds expense to construction, introduces design constraints on many lots, and does not support the City's new mobility vision. Additional housing is *desperately needed* in our overheated housing market, and ADUs and DADUs have the potential to deliver a lot of housing. Also, many backyard cottages are attractive structures that add gentle density, diversity, and character to neighborhoods.

To meet the City's goals regarding climate change and to reduce unhealthy air pollution, we must dramatically reduce our use of cars powered by gas. So far we are failing to make progress with this crucial goal. Electric cars are expensive and will not solve the problem alone. We must promote healthy transportation (walking and biking), car share services (electric ones), and transit. This approach is what SDOT has called "the new mobility." See the New Mobility Playbook (2017).

Eliminating off street parking requirements for ADUs will promote this new form of mobility by simultaneously discouraging car use and also increasing density so neighborhoods can attain transit supportive densities. Encouraging this shift will reduce vehicle miles travelled and the associated GHG emissions and local air pollution. This is so important — our children's welfare depends on it.

I am concerned that this EIS process will take a long time. The events of this year have demonstrated that climate change is on a faster timetable than we thought. We need to adapt our city to the realities of climate change as fast as possible. So let's expedite this EIS process and eliminate the off street parking requirement post haste.

Thanks for your attention.

Sincerely,

Andrew Kidde

5131 S Mead Street

Seattle WA 98118

Steering Committee: South Seattle Climate Action Network

Leadership Team: 350 Seattle

**ADUEIS**

---

**From:** svenliden1@gmail.com on behalf of Sven Liden <sven@liden.cc>  
**Sent:** Thursday, October 26, 2017 7:50 PM  
**To:** ADUEIS  
**Cc:** Destiny Bassett  
**Subject:** I support the ADU Land Use Code changes

I am writing to express my strong support for the proposal to [change regulations](#) in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADUs) in single-family zones.

I am a long-time Seattle resident (since 1991), and have seen the city grow substantially in that time. As new residents arrive, housing and rental prices have skyrocketed - and we need to look forward, not backward. Every economist from liberal to conservative agrees that the only way to address a housing shortage problem is by increasing the supply of housing. In addition to that, you will allow residents who can't easily afford increases in living costs and taxes to stay in their homes by letting them create more rentable space.

Why should the only people who can benefit from denser neighborhoods be developers who can afford to tear down a single family house and build 4- or 6-unit townhouses? By loosening the regulations on ADUs, you will allow existing residents to stay in their homes and to create more affordable housing for everyone.

The Backyard Cottage Ordinance was passed in 2009, and Not-in-my-backyard fear mongers at the time worried that every house on their block would be overrun by backyard cottages. The reality was that it barely made a dent in creating additional housing. It's so prohibitive that barely anyone wants to do it... additional parking requirements, requirements that the owner has to live there 6 months/year - there are **way** too many costs and hurdles.

I believe that this code change will be tremendously beneficial for the city, and places like Vancouver that have a more flexible ADU model are evidence of such. This code change to the ADU model will allow homeowners who don't think of themselves as a landlord to BECOME a landlord by making a simple pathway to create more housing.

Thank you!

Best Regards,

Sven Liden  
1354 E Interlaken Blvd  
Seattle, WA 98102  
(206) 786-7473



## ADUEIS

---

**From:** Jan Boyd <jan-boyd@live.com>  
**Sent:** Thursday, October 26, 2017 10:45 PM  
**To:** ADUEIS; O'Brien, Mike; Herbold, Lisa; Gonzalez, Lorena; Johnson, Rob  
**Subject:** ADU

Hello,

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. As a resident of Seattle since 1960, I support ADUs and greater density in Seattle.

Jan Boyd

**ADUEIS**

---

**From:** MIKE STECKLER <mikepammikealex@msn.com>  
**Sent:** Thursday, October 26, 2017 11:51 PM  
**To:** ADUEIS  
**Subject:** ADU Proposals

A few years ago I looked into building a DADU in my backyard but was put off by the limits of what I could create.

I'm a responsible person that doesn't want to impact my neighbors with an unattractive housing unit but when I looked into the current restrictions I would have to tear down my garage and build a two story 20x20 box.

I would welcome the new proposals as I would be able to build an attractive structure and provide ample off street parking for my tenant and myself.

I do feel that it's every homeowners responsibility to their neighbors to provide their own off street parking as to not impact the property owners that choose to not participate in an ADU plan.

Furthermore I would much rather have a responsible ADU next door rather than 8 unrelated people living in one house with all of their cars parked all over the neighborhood as the current law provides.

If the new ADU land use code proposals aren't ratified I fear we will be inundated with the alternative of "8 unrelated" house conversions sprouting up throughout our beautiful city.

Mike Steckler

Sent from my iPad

**ADUEIS**

---

**From:** Pennucci, Aly  
**Sent:** Friday, October 27, 2017 7:57 AM  
**To:** ADUEIS  
**Subject:** FW: Comments on EIS scoping regarding changes in ADU and DADU code - from Northeast District Council

---

**From:** Barbara Krieger [mailto:bb2906@comcast.net]  
**Sent:** Thursday, October 26, 2017 5:23 PM  
**To:** Pennucci, Aly <Aly.Pennucci@seattle.gov>; Burgess, Tim <Tim.Burgess@Seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>; Herbold, Lisa <Lisa.Herbold@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Johnson, Rob <Rob.Johnson@seattle.gov>  
**Cc:** Harrell, Bruce <Bruce.Harrell@seattle.gov>; Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; Harris-Talley, Kirsten <Kirsten.HarrisTalley@seattle.gov>  
**Subject:** Comments on EIS scoping regarding changes in ADU and DADU code - from Northeast District Council

**Northeast District Council (NEDC)**

October 26, 2017

Aly Pennucci  
 Legislative Department  
 P.O. Box 34025  
 Seattle, WA 98124-4025  
[Aly.Pennucci@seattle.gov](mailto:Aly.Pennucci@seattle.gov)

Re: Comments on EIS and proposed Changes for Detached and Unattached Accessory Dwelling Units

Dear Ms. Pennucci:

The Northeast District Council (NEDC) presents environmental scoping comments on the proposed changes to regulations in the Land Use Code removing restrictions on accessory dwelling and detached accessory dwelling units (ADUs and DADUs). We support the “no action” alternative, or development of a third alternative that would more adequately preserve and protect neighborhoods, with the proviso that neighborhoods have input to the alternative.

The Northeast District encompasses diverse neighborhoods and housing stock/landscapes (University, Ravenna, Laurelhurst, Portage Bay, Roanoke Park Roosevelt, Wedgewood among others). There are many different size lots, some very hilly, houseboats and docks without parking, blocks with and without alleys. There should be no “one size fits all” code regarding ADUs and DADUs, but rather a code and EIS that examine the local conditions, and includes resident input.

Many homeowners have views, or have invested in solar panels so that shading of panels would occur with a too-high DADU, or in the winter with a 1-3 foot increase in building height. In the event of a flat roof DADU with the new alternative maximum footprint, views and privacy would be compromised. Any height and scale/mass increase should avoid shading of neighbor investments such as solar panels.

One unit on a lot must be owner-occupied. While the EIS may study the effect of an absentee landlord, common sense suggests that maintenance, neighborhood stability, crime, and community sensibility are improved with owner-occupied units. The scoping EIS should include investigation of financial incentives to retain the character of the housing, such as keeping the neighborhood bungalow or brick character of the buildings, in return for a delay in property tax increases for several years. Formerly in Seattle, when a house was substantially remodeled (eg a second floor added), one could apply for a several year respite from an increase in property taxes. Similar financial incentives should be investigated to encourage rain gardens, tree planting, green landscaping, etc., on sites where density is increased by an ADU or DADU.

Single-family homes should NOT be allowed to have both an ADU and a DADU as presented in Alt 2. Parking requirement of one space off street for each dwelling unit must be retained, with pervious surfaces preferred and climate resilient features such as rain gardens required. We may expect an increase in winter rains and stormwater flows, especially in hilly neighborhoods. Thus the protective aspect of the tree canopy (softens rainfall and lessens soil erosion), rain gardens in the yards, and even gardens of residents will be important to future mitigation of adverse climate change impacts. Hopefully incentives will be given for additional tree plantings.

The EIS should study the privacy impact of allowing DADU entrances on any façade. Currently, entrances cannot face the nearest side or rear lot line unless the lot line abuts and alley or other public right-of-way. This approach provides some protection to adjacent neighbors.

The number of unrelated people allowed to live on a single-family lot should not be increased from 8 to 12, and other options should be explored. The EIS should examine the impacts of both 8 and 12 unrelated people living on a single-family lot. Other jurisdictions limit the number to 5 or 6 unrelated people and the EIS should study these options.

The EIS must address the affordability issue for lower and middle-income families. Even if these units are rented, they are expensive to build, and rents would be high. The earlier suggestion of a respite from a property tax increase for some short time period could be linked to a ceiling on the rent of the DADU or ADU, but only for owner occupied units. Similarly, if these units are short term rentals in say, Air BnB or other program, the ADU and DADUs should be registered and taxed.

Displacement impacts and the impacts on existing housing, the potential elimination of housing and destruction of our tree canopy require study in the EIS.

We appreciate the opportunity to provide environmental scoping comments.

--	--	--	--

Sincerely,

Barbara Krieger and Jorgen Bader for the Northeast District Council

cc: Mayor Tim Burgess and Members of the Seattle City Council

**ADUEIS**

---

**From:** DeForest, Stephen E. <sdeforest@foxrothschild.com>  
**Sent:** Friday, October 27, 2017 8:29 AM  
**To:** ADUEIS  
**Cc:** DeForest, Stephen E.  
**Subject:** Scoping Comments

Limiting the scoping process to two alternatives – ALT #1: no change to the existing regulations, and ALT #2, allowing two ADUs on one lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and located of detached ADUs/DADUs – would severely limit the opportunity for community input. For that reason I urge that the City of Seattle add a third, and possibly a fourth alternative. Having just two alternatives would put in an untenable position those individuals who support more affordable housing but oppose removing all restraints on developer exploitation of single family neighborhoods. For example, deletion of the ownership requirement, coupled with a reduction of lot size to 3200 square feet, would enable a developer to purchase and then subdivide a 9600 square foot lot into two lots, and build 3 housing units (house, ADU and DADU) on each of the 6 3200 square foot lots, resulting a possible 18 unrelated renters. With the elimination of any parking requirements for the ADU and DADU units, parking in the street could become a free-for-all, and traffic congestion a nightmare. Many residential streets have the equivalent of 3 lanes. With parking on both sides, that leaves one lane for through traffic. If the parking spots are all taken, the intersection at the end of the block would be totally clogged. In many neighborhoods, including Magnolia where I live, only those tenants who live near a bus route or light rail, could conceivably not own a car, but this would depend on where they work, or attend school, or access medical facilities. The carte blanche which ALT #2 would give developers would also likely result in a significant loss of tree canopy, as they may cut trees in order to maximize the area for construction, and the size of, the structures.

Please add another alternative, or two, that is/are critically needed to make the scoping meaningful.

Sincerely,  
Stephen E. Deforest

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

**ADUEIS**

---

**From:** Matt Hutchins <matt@castarchitecture.com>  
**Sent:** Friday, October 27, 2017 9:16 AM  
**To:** ADUEIS  
**Subject:** Re: Beyond Backyard Cottages: 10 ideas to address Seattle's housing shortage

Aly & Nick

I hope last night's melodramatic open house wasn't too hostile. I appreciate you all doing community outreach even when, especially when, the community is less than receptive.

Anyway, as of this morning, we have **292 supporters who have endorsed the ADU EIS comments**, and I know many of them appreciate your efforts as well. I hope that we'll see some of those recommendations studied as part of Alt 3.

Thanks!

On Fri, Oct 27, 2017 at 7:37 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Hi Matt,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process. And thank you for sharing links to the responses posted online.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Matt Hutchins [mailto:[matt@castarchitecture.com](mailto:matt@castarchitecture.com)]  
**Sent:** Wednesday, October 25, 2017 10:01 AM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>; O'Brien, Mike <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>; Herbold, Lisa <[Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov)>; Johnson, Rob <[Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov)>; Gonzalez, Lorena <[Lorena.Gonzalez@seattle.gov](mailto:Lorena.Gonzalez@seattle.gov)>; Burgess, Tim <[Tim.Burgess@Seattle.gov](mailto:Tim.Burgess@Seattle.gov)>; Assefa, Samuel <[Samuel.Assefa@seattle.gov](mailto:Samuel.Assefa@seattle.gov)>; Nyland, Kathy <[Kathy.Nyland@seattle.gov](mailto:Kathy.Nyland@seattle.gov)>  
**Subject:** Beyond Backyard Cottages: 10 ideas to address Seattle's housing shortage

Dear Councilmembers, Department of Neighborhoods and Office of Planning & Community Development,

Over the last few months there have been intense online discussions about backyard cottages in conjunction with the ADU EIS. Recently a new group, **MOAR**, formed and met in person to brainstorm the many ways we could make backyard cottages more frequent, and in turn, the city more affordable.

*MOAR (More Options for Accessory Residences) is a group of citizens concerned with the future of the city, housing availability and affordability. We have diverse backgrounds, experiences and housing situations, but we're all Seattleites who want our city to allow more options for accessory residences. For us, our neighbors, and future generations.*

We put our thoughts and experiences together into a petition, "[10 Ideas to address Seattle's housing shortage](#)".

Please see the attached PDF that includes the names of over 220 people who have already signed this petition in just three days.

If you visit the petition website ([link](#)) you will see the fantastic reasons people have given for supporting MOAR's ideas for new housing options.

MOAR's petition will also be submitted as an official response to the request for public comment to the Environmental Impact Statement for the Accessory Dwelling Unit. We are sending these comments to [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov).

We ask that you continue the difficult work to educate Seattleites about the important connections between housing choice, affordability and climate justice.

If you have any questions for the group, please feel free to contact me. Thanks!

--

Matt Hutchins

[206.501.7051](tel:206.501.7051)

--

Matt Hutchins, AIA  
Principal, CAST

206.256.9886

[www.CASTarchitecture.com](http://www.CASTarchitecture.com)

**ADUEIS**

---

**From:** Tom Leahy <taleahy@comcast.net>  
**Sent:** Friday, October 27, 2017 11:06 AM  
**To:** ADUEIS  
**Subject:** Comments about proposed DADUs and ADUs

To Whom It May Concern:

We are commenting on the proposal to change regulations in the Land Use Code to make it easier to build accessory dwelling units in single-family zones throughout the City of Seattle.

1. The two public meetings the City scheduled to discuss this issue were in the south end on October 17 at High Point Community Center in West Seattle, and one is scheduled October 26 at Hale's Brewery in Fremont. These take place in the middle of the week in the evening at very limited locales with limited public transportation access. It will be hardly surprising that many communities do not show up and that many people do not even know about this proposal. The public notice is inadequate.
2. Assuming there were such units, not addressed are what regulations will be in place to assure that the landlord does not discriminate on the basis of race, ethnicity, religion, sex and sexual identity, families with children, persons with disabilities, and socio-economic status. What enforcement regulations will be in place?
3. What regulations will be in place to assure these units are not simply air-bnbs with short-stay, rapid turnover clientele?
4. The owner-occupied requirement should not be eliminated. This assures that there is a real homeowner who lives on site with a vested interest in maintaining the property and assuring that the tenant is complying with reasonable neighborliness, such as noise levels or not throwing garbage everywhere; this assures that a neighborhood be a real neighborhood rather than mega-corporate-absentee property managers.
5. The rental of these units must be to long-term *bona fide* tenants (not absentees or quick turn-overs) to prevent short-term air-bnb rentals.
6. The whole premise of loosening up housing density standards in single family areas, and the premise of HALA, is to increase housing opportunities for "affordable"

housing. But that is not what this proposal does. Here, there is no *quid pro quo*. The City seeks to increase density, eliminate parking requirements, increase height of the buildings, but gives nothing in return to the neighborhood except an opportunity for the property owner to make an extra buck. These rental units must meet Mandatory Housing Affordability (MHA) - open and accessible to people with low income and limited means. This should not be simply another opportunity for get-rich schemes by the property owner or developer, charging as much as possible, and cramming as many people as possible into the units. The City needs an enforcement unit to assure the units are affordable and remain so. The only exception would be for units occupied by the homeowner's immediate family members (*real* mother-in-law apartments). Once the family member has vacated, the unit must be affordable and should be subject to other requirements discussed in these comments.

7. The units must not exceed the height of the principal dwelling and must not cast a shadow on adjacent properties. We Seattlites get little enough sunshine as it is during the fall, winter and early spring. Taking sunshine away diminishes the property values and property uses for adjacent home owners.
8. There is no discussion in the materials the City provided, nor any assessment by the City, of the strain and impacts on current infrastructure on a neighborhood by neighborhood basis. For example, the sewer line in my neighborhood is over 100 years old. A small part of it disintegrated in the last few years, and it took the City four months to replace 90 feet of pipe during which time it closed down the street, destroyed abutting property while jackhammering to remove the pavement, etc. etc. The City simply did not have adequate SPU personnel to promptly fix the sewer line. With an aging infrastructure and increased density such problems will occur with greater frequency, and the City does not currently have the resources to deal with these problems. Added housing will only increase the problems. The City has not adequately assessed this issue.
9. Assuming some of these units can actually accommodate families, what is the future impact on schools, and other services? Due to variability, impact needs to be determined on a neighborhood by neighborhood basis. The City has not assessed this issue.
10. With respect to any home owner who decides to build such units, adequate notice should be provided to the local community (at a minimum a five-block circumference). The home owner should be required to provide the proposed building specifications with adequate time and opportunity for the local community to object. And, there needs to be a process for objections and appeal to a neutral person, such as a hearing examiner.

11. Once the unit is built, there needs to be a process to assure that all the criteria described above continue to be met. And there needs to be a mechanism for the neighborhood to participate in that process.

Sincerely,

Tom and Jennifer Leahy  
1615 NE 63<sup>rd</sup> Street  
Seattle, WA 98115

## ADUEIS

---

**From:** Brooke Brod <brooke.brod@gmail.com>  
**Sent:** Friday, October 27, 2017 11:32 AM  
**To:** ADUEIS; Gonzalez, Lorena; Johnson, Rob; O'Brien, Mike; Herbold, Lisa  
**Subject:** ADU EIS Scoping Proposals

October 27, 2017

To Whom it May Concern:

Seattle is not an island; we are part of a tightly interwoven region that includes other large and small cities, that includes rural areas and farmland, stunning natural resources, open space and parklands, and so much more. The land use decisions we make will have impacts far beyond our city limits and so I am asking that the Accessory Dwelling Units EIS include analysis on the regional impacts of each alternative that are aligned with some of the key planning goals we have set through other planning processes.

First the EIS should address some of the key goals of Vision 2040, the regional strategy for creating a sustainable future for the central puget sound region.

- **Environment.** The region will care for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, reducing greenhouse gas emissions and air pollutants, and addressing potential climate change impacts. The region acknowledges that the health of all residents is connected to the health of the environment. Planning at all levels should consider the impacts of land use, development patterns, and transportation on the ecosystem.
- **Development Patterns.** The region will focus growth within already urbanized areas to create walkable, compact, and transit-oriented communities that maintain unique local character. Centers will continue to be a focus of development. Rural and natural resource lands will continue to be permanent and vital parts of the region.
- **Housing.** The region will preserve, improve, and expand its housing stock to provide a range of affordable, healthy, and safe housing choices to every resident. The region will continue to promote fair and equal access to housing for all people.

In addition to the regional strategy the EIS should also address how each alternative furthers the goals of the Growth Management Act, which calls up on us to address:

- **Urban growth** by encouraging development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
- **Reducing sprawl** by limiting the amount of sprawling, low-density development.
- **Housing** by encouraging the availability of affordable housing to all economic segments of the population of this state and promoting a variety of residential densities and housing types while encouraging the preservation of existing housing stock.
- **Conservation** by helping to discourage growth and development into productive forestlands and productive agricultural lands while also retaining our open spaces and protecting habitat for fish and wildlife.
- **Environment** by ensuring our policies and plans state's high quality of life, including air and water quality, and the availability of water.

I would like to see the EIS explain how each alternative will help move us closer (or not) to achieving these important goals. What will be the potential impacts to reaching our climate change goals? What will be the potential impacts on sprawl throughout the region? What will be potential impacts of forcing more people to drive into the city from further away? What will be the impact on the preserving public lands and rural lands and overall conservation throughout the wider region?

And I believe an EIS that helps both the council members and the public see how our policies in the context of wider regional impacts on the environment, economic opportunity, and equity will be enormously beneficial in making the case for greater density by allowing for smart in-fill development in more of our neighborhoods here in Seattle. A single individual's love for one tree shouldn't trump the opportunity to save 100 trees in the forests that are only an hour or two away from our city center. A single individual's love for one particular block should trump the need prevent the paving over of important rural lands or wildlife habitat to make room for more sprawling development simply because we are unwilling to make more room in our own neighborhoods for people. One person's desire to preserve a parking spot, shouldn't trump the need to reduce car travel into the city from places like Renton, Federal Way, Bothell and beyond.

And EIS that demonstrates these wider trade-offs we have to make in our policy is critical and will help us shape a more productive conversation about the policy choices we make. I sincerely hope that you will include this type of broader analysis in the EIS.

Thank you for considering my suggestions.

Sincerely,  
Brooke Brod  
5813 17th Avenue NE  
Seattle, WA 98105  
(646) 418-5092

**ADUEIS**

---

**From:** Cheri Adams <cheriad@windermere.com>  
**Sent:** Friday, October 27, 2017 11:33 AM  
**To:** ADUEIS  
**Subject:** Comment on EIS for ADU/Backyard Cottages

To Whom it May Concern:

I attended the meeting at Hale's Ale's last night. I am against any changes to the existing rules and codes. They were well thought out and create a pathway for more in-city housing. The current codes allow for one additional residence on a single family lot. Why don't you put some energy into promoting and streamlining the current codes to make it easier for people to remodel or develop their properties?

The Alternative 2 (O'Brien Proposal) has changes that would very negatively impact livability in Seattle, taking away tree canopy, light, and if you take away the owner occupancy requirement, will change the character of neighborhoods.

1. Number of residences allowed on a single family lot: Two is enough (Three is too many).
2. Parking: Keep the parking requirement. Buses do not often go where people need to go, so they will drive, and have cars which will end up on the street.
3. Owner occupancy: Keep the owner occupancy. If you remove this, you are setting up a land grab by investors, many of which have no regard for neighborhood harmony.
4. Minimum lot size: Keep at 4,000 sq'. With three residences on a 3,200 square foot lot - where are the trees and light???
5. Maximum square footage: Keep existing requirement.
6. Maximum Height: Keep existing limit to not further shadow the neighbors.
7. Lot coverage sq': Keep existing requirements.
8. Rear yard coverage: Keep existing limit.
9. DADU entrances: Keep existing requirement to protect the neighbors.
10. Roof Features: Keep existing rules.
11. Household size: Really? Up to 12 people living in three residences on a 3,200 square foot lot? With no parking? This is crazy!

Thank you,

Cheri Adams  
206-789-7700

## ADUEIS

---

**From:** Chinook Book <aaron.richey@chinookbook.com>  
**Sent:** Friday, October 27, 2017 2:17 PM  
**To:** ADUEIS  
**Cc:** Aaron Richey  
**Subject:** Please approve proposed ADU changes

Hello,

I am a concerned citizen from the Maple Leaf neighborhood who believes this city must increase density and increase rental housing units in order to accommodate growth. This seems like a no-brainer to allow landowners to take more control over options, generate income (and spread income across lower and middle income property owners), and create more units in central neighborhoods.

Please approve the changes proposed to the Single Family zoning.

Thank you,

Aaron

Sent from my iPhone

## ADUEIS

---

**From:** Kate Martin <katemartinseattle@gmail.com>  
**Sent:** Friday, October 27, 2017 2:38 PM  
**To:** ADUEIS  
**Subject:** ADUEIS Comments and Scoping Suggestions

Good Afternoon.

Here are some comments and suggestions that I'm submitting today for the ADUEIS scoping process.

### ADUEIS Comments:

- **Keep Owner Occupancy Requirement:**  
I would suggest keeping the owner occupancy requirement.

Home ownership provides a stable place to live and containable, predictable costs and helps people build nest eggs. Renting spaces in your own house to others helps pay the bills and expands the number of people we can house on 5,000 sf lots. Often owner-occupants rent rooms out at fair prices. I don't know what you have in mind for dealing with Airbnb, but having the owner-occupied house could keep that in check too. Otherwise, we could wind up with no additional affordable housing for people that actually live in Seattle. Perhaps develop policy about that because I can imagine non-occupant developer folks building the lot out to the max and having them all be Airbnb. I'm not against Airbnb. If it helps someone to stay in their house, I'm particularly sympathetic, but no owner occupant could be potentially troublesome revolving door of 12 people all the time, none of whom may live in Seattle. As far as home ownership, which we can see statistically that it has been in decline since the 60s and that is an impact we shouldn't stand by and watch happening. The owner occupancy requirement could help address this. A few people could buy a house together therefore making it way more affordable to get on the homeowner train. If there was both an ADU and a DADU, 3 people or 3 couples or 3 families could pool resources and buy together or even develop together. This would be optimal. We should encourage that.

Additionally, having the owner on-site keeps the housing - with up to 12 people living in them - neighborly and the continuity of owner occupancy helps strengthen the social fabric of the blocks in our neighborhoods. Not having an owner occupant with up to 12 people living on a site is potentially disastrous. I live with the maximum number of allowable people, 8, in my home in PhinneyWood that I own and share with 7 others. I don't even have to go away for 2 weeks and things start to fall apart. I get a house sitter now when I go away to keep things in check even though I like my housemates very much. There's just something about when the cat's away the mice will play kind of phenomenon that happens without fail otherwise. Without an owner occupant on site and such large groups proposed to be on one lot, I imagine the tone could easily become likened to the boarding houses in the University District where anything goes and no one cares. That has a huge social impact in that it winds up driving out owners that can't take the mayhem, understandably. Additionally, if developers just start buying up SF lots and putting the maximum allowable structures on them, then investors will buy those properties for their rental portfolios and there likely goes any semblance of affordability or civility for that matter. Owner occupancy (and owner occupied development) of SF lots to include an ADU and DADU are things that can really help keep Seattle a place where families can own and stay for a lifetime and beyond.

- **Reconsider Rear Yard Coverage Limit:**  
I would suggest deleting that idea of allowing one-story structures in rear yards to cover up to 60% of the rear yard.

We shouldn't be encouraging one-story DADUs of that 1000sf size. I do like the idea of not counting garages or storage in the DADU size and that's a nice improvement, but that can be accomplished with a 2-story building with the coverage restriction we already have at 40% of rear yard when an alley is present, which is where DADUs work the best. Perhaps upping the rear lot coverage allowed to 45% or something in that magnitude is more reasonable. Even a decent size 2-car garage is less than 500 sf. Encourage people to build down and up when new construction is involved. Basements only cost about \$20K - \$30K on a 500sf footprint, so then the DADU could be a kind of townhouse with some of the unit below, some with a garage on alley level and some on the second floor. That could house a nice size group or family without covering the precious land needed for patios, gardens, trees, etc. I rebuilt my 1954 house in 2008-2009 to the maximum building envelope and that is how I can share my house with 7 others. We should encourage that. I have a plan to build my DADU after this EIS is finished. On my 5000 sf lot, I will have my house, 2 off alley parking spaces and my "townhouse style" DADU as I described it, all without covering more than 35% of my lot or more than 40% of my rear lot. There's lots of trees and gardens all around for everyone to enjoy, too. Maybe the policy should take a look at lots without alleys with these things because they often include long driveways from the front to the back which is such a sad use of the land after you've covered so much with 2 buildings.

#### **ADUEIS Scope Suggestions:**

- **Consider including all rear yard accessory structures in this scoping.**

It would make sense to allow people to build all rear-yard accessory structures up to the physical parameters outlined for DADUs. That way when some is building a garage or a wood shop or an office or whatever in the backyard, they can build it up to whatever size up to the maximum building envelope allowable and nickel and dime themselves over time with the further finishing out of the spaces. For instance, frame and dry in a two-story garage with basement. Rough in all the utilities at that time. A few years later, finish the upstairs. A few years later, finish the basement. And so on. We just can't have people building little garages that are too small for much of anything and that have no future housing potential because they don't want to or can't afford to jump all in on a DADU. Just like people finish basements in their houses and attics in their houses, this is the same idea. Once you have the rough space, it's a lot easier to move forward later when more money is available. The DADU process all in one bite is a bit daunting. People are paying over \$200K for them – all at one time. That certainly is a big reason we've seen so few of them. Meanwhile, if we extended the physical constraints to be common for all rear yard accessory structures, they could spend \$75K to get a structure and throw another \$50K in later and so on.

Thank you for this opportunity to submit comments and suggestions.

Kind regards,

Kate Martin  
412 NW 73<sup>rd</sup> St  
Seattle, WA 98117-4927

[katemartindesign.com](http://katemartindesign.com)  
site plans + floor plans  
voice + text (206) 579-3703  
[houzz.com/pro/katemartinseattle](https://houzz.com/pro/katemartinseattle)

**ADUEIS**

---

**From:** Bruce A. Finlayson <bafinlayson@mindspring.com>  
**Sent:** Friday, October 27, 2017 9:32 PM  
**To:** ADUEIS  
**Subject:** Proposed ADUs Environmental Impact Statement

Dear Person:

I oppose Alternative 2 for the following major reasons.

In Alternative 2, an investor can build a home, an attached accessory dwelling unit (AADU) and a detached DADU, and rent out all three of them. That is not appropriate for an area zoned for single family residence.

In Alternative 2, no off-street parking is required. That is not reasonable when up to 12 people can live there (with a residence, AADU and DADU). There is absolutely no reason to allow 12 people to come together, and have no parking required at all. The wish that all the new residents in Seattle should ride their bikes to work may pass muster in City Hall, but it certainly isn't visible to me where bicycle improvements have been made. (I rode a bicycle to work for 42 years.)

The definition of 'related' has been interpreted by the weak-kneed city inspectors as people living together regardless of the 'relation'; with the city not defining 'related' this allows any number of people to live there, again without parking. I live near the Sisley properties and city inspectors would allow an eighth person in a front porch with plywood walls, no windows, and extension cords hanging down between a window of the house and the front porch so that the eighth person on the porch could have electricity. I do not trust city inspectors.

Seattle residents, and voters, have bought houses in areas zoned for single family residence. They contribute to the community and expect the City of Seattle to honor its commitment. While one or two AADU in a block is acceptable to me, making it possible for one AADU in every lot on a block is changing the character of a neighborhood. If a block now has 14 dwelling units, with AADU there could be 28 and with an additional DADU there could be 42. That is essentially taking away property rights that were established by the City of Seattle when the single family residence was purchased. If an AADU or DADU is added to a single family residence, it is absolutely essential that the owner must occupy either the main house or the AADU.

Alternative 1 should be retained but there needs to be added a maximum density of houses with ADUs in an area. Alternative 2 would degrade the quality of life in Seattle.

Bruce A. Finlayson

6315 22<sup>nd</sup> Ave NE

Seattle, WA 09115

206-524-3375

[bafinlayson@mindspring.com](mailto:bafinlayson@mindspring.com)

## ADUEIS

---

**From:** annemarie dooley <annemarie.dooley@gmail.com>  
**Sent:** Saturday, October 28, 2017 6:32 AM  
**To:** ADUEIS  
**Subject:** ADU-EIS

To Whom it May Concern

I live in Wallingford (District #4). I have lived here for 16 years. I am concerned with the proposed rule change to allow all single family units to have 3 units built on them

My first concern is that the neighborhoods were not consulted.

I am in favor of increased housing availability. I was in favor of the homeless shelter that opened in my kids preschool (40th and Meridian) a few years back. I would love more density and more kids on the street.

What I worry is that will become a free for all for developers . This happened 2004-2006 especially. It will also bring many more cars on the street. What I would love to see is more density in terms of bikers and walkers from local residents

-Annemarie Dooley  
3509 Meridian Ave N  
Seattle

**ADUEIS**

---

**From:** julian perez <pere\_jc@hotmail.com>  
**Sent:** Saturday, October 28, 2017 8:15 AM  
**To:** ADUEIS  
**Cc:** Johnson, Rob  
**Subject:** Comments after Hales Palladium meeting

I live at 1908 N 35th St in lower Wallingford. We have been resisting out of control developers for a few years now. We saw how Ballard neighborhood turned into condo hell and became too dense too quickly and made getting in and out even harder than it was previously. It began when AMLI bought the plastics factory kitty corner from our house and built a 400+ unit complex and admitted under pressure from the community, that their priority in the project was "profit" not Community. We realized that the neighborhood regulations on development and remodels was an unenforceable document that AMLI did not have to respect. Our concerns then were the following:

- 1) not enough parking spaces in their planned garage forcing overflow into our narrow already crowded streets
- 2) Family neighborhood with small children would now be at higher risk of motor vehicle/pedestrian accidents
- 3) AMLI wanted to build work/live spaces on main floor of new structure on Wallingford Ave which were not successful in our previous neighborhood of Greenlake. Those spots are still not full over a year after completion of this large project and we have no useful amenities like a credit union or Bartells
- 4) more density on an outdated sewer system. Most of the neighbors on Meridian and Burke are digging up and replacing their sewer lines because they are 100 years old and failing at their own cost. A serious injustice to be responsible for the sewer line after it leaves your property.

Please see attached photos for some of the examples of what the proposed O'Brien legislation would do to Family neighborhoods. This was the next addition within 1 block from my house. Built on the site of a historic Seattle home not identified for preservation until after bought by the developer and quickly demolished (we usually have little to no warning when this happens). This violates our unenforceable neighborhood rules and regulations for new development. We are a neighborhood of 100 year old Craftsman style homes. The character is what draws families with children. This builds a core group of parents that organized in years past for strong schools. My fear when this was built is that we would see an influx of single folks or couples without children who would begin to dilute our voice, thus making an inhospitable neighborhood for families with children.



The second is an even denser construction project on Wallingford between N 35th St and N 36th St. It is 2 dwellings on a lot with higher roof tops than the original house. Crowded. Cut down old trees. Lost most of the neighborhood character. They added a bit of color to building and did some nice landscaping. There 2 units (second not seen here) with car ports.



3rd photo is another one build even more dense and higher. 3 units this time. On even smaller lot. Characterless. Cut down all the trees on that lot. What about our canopy? What about global warming? What about this neighborhoods watershed and basement flooding events? Cutting down trees is not going to help that. Where does this end?



And the cou d' etat... the latest property sold and demolished. I currently see a similar foundation construction to #1 above. Who knows how dense it will be or how high the rooftops will go. We are all aware of the loop holes developers can use to pay a small fine and build higher to add more units!



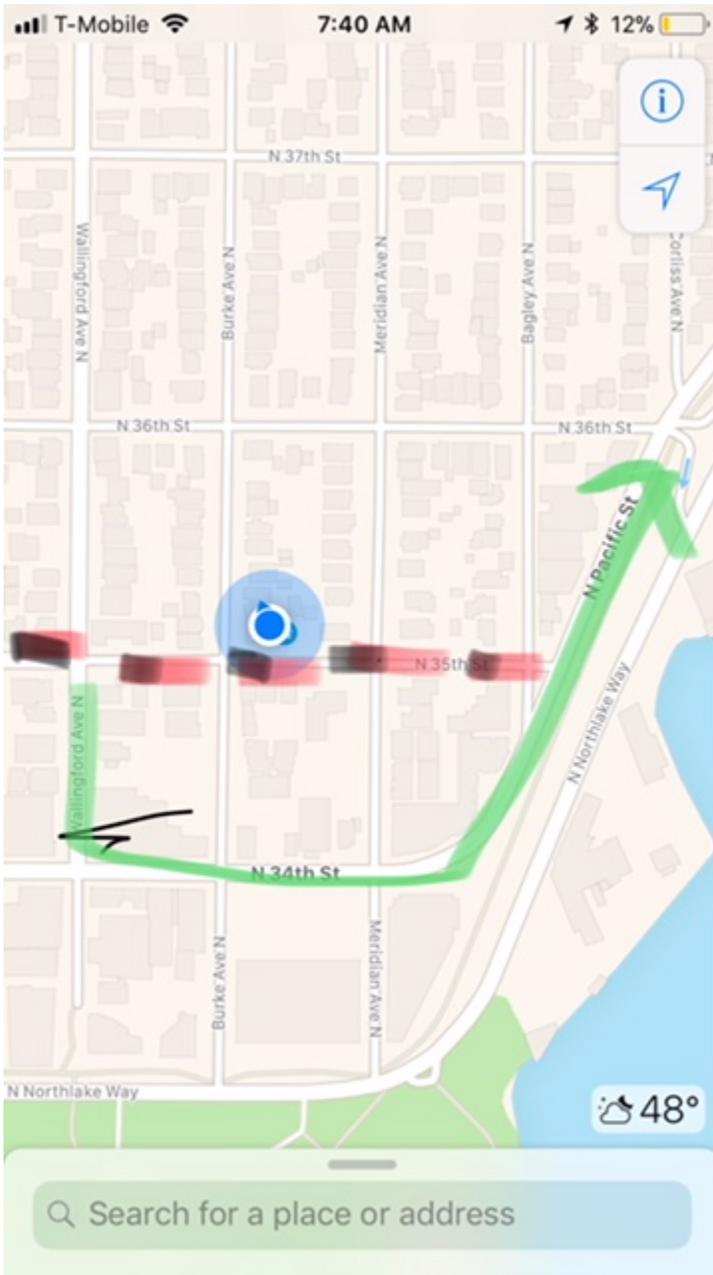
This is an example of a very nice remodel done on the same street with a rentable basement. This is the spirit of the original O'Brien and HALA proposals where folks could be incentivized to remodel basements, add 2nd stories, or build a mother-in-law and rent to a displaced Seattleite.



Across my street is an example of the real life implications of building more units on your back yard. There is a blue complex behind the green house too. Owner has all four structures on 2 adjacent properties.



Crowded, poor visibility of neighbors, and this driveway is the highest incidence of accidents on our crowded narrow street already with poor visibility and people that use it as a thoroughfare to get from the west side of N35th St to N Pacific St. At least they have a pitched roof, thus preserving some of the appearance of the rest of the neighborhood. The red is how people race thru probably guided by navigation systems that don't discriminate tiny streets from arterials. The green is how the street signs direct traffic along the arterial.



Last is a good example of condos built many years ago where a mental asylum used to stand. Great job! Colorful, pitched roofs, in neighborhood style. They attract couples with kids. Home run while increasing density.



So densification can be done thoughtfully, in style, with neighborhood buy-in and preserve character of the area, and attract families with kids. The above photos show the race to the bottom of city development. It's sad. And I'm upset because I spent a hell of a lot of money on my house as a HOME. It's not my investment. My neighborhood and my neighbors are my investment. I'm seeing things change and it threatens the dream where I want to raise my daughter in a quiet safe place in the city with great schools. We are very sympathetic to homeless people's situation. We are progressive voters. We vote for tax increases on our property racks every time one is on the ballot. I care for dozens of homeless and nearly homeless patients in my family medicine clinic at Sea Mar. I am not a NIMBY. This is about smart growth. This is about justice and putting the responsibility for housing the displaced residents of Seattle squarely in the shoulders of the responsible parties -Amazon and the Mayors office.

It is a good thing that Amazon is looking for another HQ because Seattle can't stand anymore of this out of control growth

This is my family. Remember us when you attempt to ramrod legislation that threatens the family environments if Seattle. Destroying environment is the best way to make anything extinct.



Si Se Puede!!!

Julian Perez

**ADUEIS**

---

**From:** Jeannie Hale <jeannie.hale@outlook.com>  
**Sent:** Saturday, October 28, 2017 10:06 AM  
**To:** ADUEIS  
**Subject:** RE: ADUs & DADUs

When is the deadline to submit scoping comments? Thanks for your message.  
 Jeannie

---

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Saturday, October 28, 2017 6:34 AM  
**To:** Jeannie Hale <jeannie.hale@outlook.com>  
**Subject:** RE: ADUs & DADUs

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** Jeannie Hale [<mailto:jeannie.hale@outlook.com>]  
**Sent:** Thursday, October 26, 2017 11:48 AM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Cc:** Colleen McAleer ([billandlin@aol.com](mailto:billandlin@aol.com)) <[billandlin@aol.com](mailto:billandlin@aol.com)>; Burgess, Tim <[Tim.Burgess@Seattle.gov](mailto:Tim.Burgess@Seattle.gov)>; Johnson, Rob <[Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov)>; Herbold, Lisa <[Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov)>; Harrell, Bruce <[Bruce.Harrell@seattle.gov](mailto:Bruce.Harrell@seattle.gov)>; Bagshaw, Sally <[Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov)>; Gonzalez, Lorena <[Lorena.Gonzalez@seattle.gov](mailto:Lorena.Gonzalez@seattle.gov)>; Harris-Talley, Kirsten <[Kirsten.HarrisTalley@seattle.gov](mailto:Kirsten.HarrisTalley@seattle.gov)>; Juarez, Debora <[Debora.Juarez@seattle.gov](mailto:Debora.Juarez@seattle.gov)>; O'Brien, Mike <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>; Sawant, Kshama <[Kshama.Sawant@seattle.gov](mailto:Kshama.Sawant@seattle.gov)>  
**Subject:** ADUs & DADUs

Dear Aly,

Attached and pasted below are scoping comments from the Laurelhurst Community Club (LCC) and the ADU/DADU issue.

Colleen and Jeannie  
 LCC

October 26, 2017

Aly Pennucci

Legislative Department  
P.O. Box 34025  
Seattle, WA 98124-4025

Re: Comments on Changes for Detached and Unattached Accessory Dwelling Units

Dear Ms. Pennucci:

The Laurelhurst Community Club (LCC) offers the following environmental scoping comments on the proposed changes to regulations in the Land Use Code removing restrictions on accessory dwelling and detached accessory dwelling units (ADUs and DADUs). We support the “no action” alternative or development of a third alternative that would more adequately preserve and protect single family neighborhoods. The current proposal would essentially duplex or triplex single-family neighborhoods with no assurance that affordable housing would be created.

The Laurelhurst neighborhood was developed with many less than standard size lots and before two cars and garages became the norm. Most of our streets are narrow. We are located adjacent to two major institutions. We find we must continually work to maintain the residential character of the neighborhood, minimize the impacts of traffic, continually work on parking issues, and keep the stress of urban living down to a healthful level. The changes proposed at this time threaten to decrease the quality of our living environment. Neighbors are already experiencing the increased pressures from units now permitted.

Single-family homes should not be allowed to have both an ADU and a DADU. Alternative 2 would allow a single lot to have both an ADU and a DADU. This raises many issues that must be studied in the environmental impact statement (EIS), including loss of privacy to adjacent property owners, parking issues, shading caused by the DADU and loss of trees, vegetation and the ability of neighbors to garden on their own property.

Parking requirement of one space off street for each dwelling unit must be retained. The EIS should include a thorough study of parking availability in single-family neighborhoods including the history of the city granting parking waivers under the current code. Despite the boost in transit hours from Metro, bike lane additions, street cars with limited routes, and the new operation of Sound Transit's Light Rail service, Seattle is not at all equipped to eliminate cars for transportation. Witness the gridlock from South Lake Union that occurs daily, gridlocking I-5.

Family wage earners need their cars to drop off kids at school and daycare, run to various job sites, and stop at the grocery store on the way. With nowhere to park their vehicles without a required off-street parking spot, Seattle's single-family neighborhood streets will be reduced to one lane for through-passage or residents may end of parking blocks away while hauling in groceries or assisting a disabled family member into the home. In Laurelhurst, for example, 42nd Avenue NE is impossible to drive through, except in one direction because of vehicles lining each side. Wallingford, Capitol Hill, Fremont and Queen Anne are also experiencing the same overflow of cars. Adding dwelling units without off street parking will make this worse for existing homeowners, and impossible for small businesses throughout them, to attract customers. No parking means no stopping to shop or attend a restaurant.

Require owner occupancy. The EIS should analyze the many issues raised by eliminating this requirement. The home with an ADU and a DADU, plus the principal home would essentially be a commercial

venture, rather than single-family zoned. Should the zoning then be changed to neighborhood commercial? Or, should the city consider upzoning certain areas? LCC does not support these approaches, but it seems as if the City is trying to do this in an underhanded manner and the issues should be studied. Transient, short term occupants for quick cash defeat the premise of increasing affordable, permanent residences—another related issue to study in the EIS.

With owners on the premises, there is "skin in the game" for having some good neighbor relationships with tidier maintenance, reasonable noise, and not just absentee landlords. In contrast with absentee landlords, homeowners in residence can be expected to have an immediate, active interest in who rents these extra units, and are more likely to work to ensure that the impacts which result from this increase in the density of development will be manageable. We need that assurance of owner commitment firmly in the Code.

Minimum lot size should not be decreased, for DADUs. The existing code allows for a lot as small as 4000 square feet to build a "cottage". Reducing the lot size coverage to allow for 40% coverage results in a loss of privacy, and will wipe out trees and plants and light for adjacent properties. The EIS should explore these issues. Other cities such as Santa Cruz and Boulder require 6,000 square feet for backyard cottages, 6000-8500 in Denver and 10,000 in Lexington, MA, and Mukilteo. These areas are also rapidly adding population growth, but are using a reasonable formula in adding more to the built environment.

Open back yards provide extra breathing room for those residents with kitchen gardens, and a place for their children to exercise and explore nature in their yard. Allowing too much built structure in the single-family lot zones creates a "back door" opportunity for developers who have no stake in its outcome, except profitability, and these added accessory units cannot be reversed, once built.

The 1,000-maximum square footage should include garages and storage area and square footage for DADUs should not be increased from 800 to 1,000 square feet. The EIS should study how many garages and storage areas could or already have been converted to accessory units. Would exclusion of these areas allow creation of an additional accessory unit? Storage areas should be defined. Do they include linen closets and kitchen cabinets? Larger DADUs raise issues regarding privacy of adjacent neighbors and should be explored in the EIS.

The maximum height of DADUs should not be increased by one to three feet. Currently heights range from 15 to 23 feet depending on lot width. It's possible that an extra three feet could mean a second story on a DADU. The EIS should explore this issue and include the height resulting from pitched rooflines. Particular attention should be paid to the privacy of adjacent neighbors, view lines, and light for gardens, trees and plans which are vital to a healthy urban environment.

Rear lot coverage limits should not be increased from 40 to 60 percent: This raises issues such as those mentioned in changes to height limits and minimum lot size increases and should be studied in the EIS. Destruction of tree canopy is also an issue for study in the EIS. The City of Seattle signed an Urban Bird Treaty agreement on May 22, 2017. With that commitment, the City must protect the habitat of wildlife saving the trees and greenery we have, by preventing lot coverage within the built environment.

The EIS should study the privacy impact of allowing DADU entrances on any façade. Currently, entrances cannot face the nearest side or rear lot line unless the lot line abuts and alley or other public right-of-way. This approach provides some protection to adjacent neighbors.

The number of unrelated people allowed to live on a single-family lot should not be increased from 8 to 12 and other options should be explored. The EIS should examine the impacts of both 8 and 12 unrelated people living on a single-family lot. Both numbers are too high and create maintenance issues, excess noise and lack of parking. Other jurisdictions limit the number to 5 or 6 unrelated people and the EIS should study these options.

The EIS must address the affordability issue for lower and middle-income families. ADUs and DADUs do not solve the issue. These accessory units require financing and bank loans just like any new house, and few lower income families qualify for a mortgage. It is a false assumption that adding more structures on single family lots does anything for housing the working class, but rather just gives homeowners a way to flip their back yards into another profit center for renters or student housing. Even if these units are rented, they are expensive to build, and rents would be high, so they do not add to the affordable housing stock.

Displacement impacts and the impacts on existing housing, the potential elimination of housing and destruction of our tree canopy require study in the EIS.

We appreciate the opportunity to provide environmental scoping comments.

Sincerely,

Colleen McAleer, Vice President  
3137 West Laurelhurst Drive NE  
Seattle, Washington 98105  
206-525-0219  
[billandlin@aol.com](mailto:billandlin@aol.com)

Jeannie Hale, President  
3425 West Laurelhurst Drive NE  
Seattle, Washington 98105  
206-525-5135  
[jeannie.hale@outlook.com](mailto:jeannie.hale@outlook.com)

cc: Mayor Tim Burgess and Members of the Seattle City Council

**ADUEIS**

---

**From:** Kal Brauner <KalAmy@comcast.net>  
**Sent:** Saturday, October 28, 2017 12:52 PM  
**To:** ADUEIS  
**Subject:** Comments on an EIS for Accessory Dwelling Units (ADUs)

I submitted these same comments about 20 minutes ago via the on-line comment form at <https://www.seattle.gov/council/adu-eis>. HOWEVER, when I received the email confirmation a few minutes later I saw that all of my formatting (bullets, extra lines, etc.) had disappeared. ☹️ As I think that this formatting aids in reading (or scanning) my submittal, I thought that I'd resubmit my comments by email with the formatting intact.

Kal Brauner

=====

Specific comments:

- Do not do anything that would increase current height restrictions
- Do not do anything that would reduce current setback requirements (setbacks from adjacent properties, streets and alleys).
- Do not do anything that would reduce the amount of off-street parking.
- Do not Ballard-ize any more of Seattle. Ballard is now an abomination. I used to enjoy Ballard. Poor Ballard.
- One accessory dwelling unit (ADU) per single-family-zoned lot is sufficient - perhaps more than sufficient.

General comments:

- I value Seattle's neighbors as they currently are: lawns, gardens, trees, squirrels, homes with significant setbacks from adjacent properties, homes with modest heights with few (no?) homes greater than two stories above grade level. I want these features preserved in the neighborhoods where these characteristics are the norm.
- If you must, increase density in communities that do not enjoy the characteristics I mention in the previous bullet. Among these communities are: Ballard (south of about NW 58th St - that area is already "gone"), Downtown, Belltown, Lower Queen Anne (Uptown), Northgate, Pioneer Square, Capitol Hill (alas Capitol Hill was lost long ago), the International District, and South Lake Union (poor South Lake Union).
- I don't want Seattle to turn into Manhattan (NYC), San Francisco, or Daly City (a suburb of San Francisco).
- I personally know (at least) seven people/couples (Gary & Mark, Patti King, Don Goodman, Jan Ott, Ken Small, Joe Catellani, Dick Beckenbaugh, Dick Fuhr) who have moved away from Seattle primarily because of population pressures and its attendant congestion problems. Beginning about three years ago, my wife and I have begun thinking of joining these "expats." As we both love Seattle, we don't take lightly thoughts of leaving our city -- we have lived here for over 40 years.

Bottom-line:

- I understand that there is now great demand for housing and that this demand is causing housing to be unaffordable for many. I regret this, but I am not willing to sacrifice the city I love to mitigate this problem. Strive to find solutions other than those that would destroy the character of our lovely neighborhoods.

Kalman Brauner

2603 Queen Anne Ave N  
Seattle WA 98109  
206-282-2927

**ADUEIS**

---

**From:** Hans Rasmussen <jhans.rasmussen@gmail.com>  
**Sent:** Sunday, October 29, 2017 8:27 PM  
**To:** ADUEIS  
**Subject:** Re: Public Comment for ADU EIS Scoping

Woops, please disregard this last e-mail, it was intended for my friend who feels & thinks very similarly on this issue.

Thanks

On Sun, Oct 29, 2017 at 8:25 PM, Hans Rasmussen <[jhans.rasmussen@gmail.com](mailto:jhans.rasmussen@gmail.com)> wrote:

you should consider sending something similar to this (or a copy of it) to the ADU Environmental Impact Scoping committee of the City's Office of Planning & Community Development.

The parts after the bolded verbiage are from MOAR - More Opportunities for Accessory Residences, which I think is an offshoot of Seattle for Everyone

----- Forwarded message -----

**From:** Hans Rasmussen <[jhans.rasmussen@gmail.com](mailto:jhans.rasmussen@gmail.com)>  
**Date:** Fri, Oct 27, 2017 at 2:54 PM  
**Subject:** Public Comment for ADU EIS Scoping  
**To:** [adueis@seattle.gov](mailto:adueis@seattle.gov)

Dear ADU EIS Scoping Committee,

Seattle needs more housing and living opportunities. This is a moral and pragmatic imperative. ADU's and DADU's on single-family lots would be a smart, simple, cost-effective way to provide accessible forms of housing spread across the city.

Parking requirements for these types of units should be waived because those parking requirements would render many ADU/DADU project infeasible due to existing conditions or constrained spaces. Also, cars impose an overwhelmingly negative environmental impact and should not be a codified requirement to live in this city.

On-site living requirements for owners should be eliminated because they create an economically segregating force, which is more powerful and nefarious than ever in this time of extremely high real estate values. The SF zones have unintentionally become elite enclaves in which the barrier to entry is greater than the lifetime incomes of many Seattle citizens. \$400k for a teardown, or \$500k for a true starter home, + owner occupied requirements means that all sorts of people are de facto prohibited from living in the majority of Seattle (SF zones occupy ~60-70% of land in Seattle, depending on how you crunch the numbers). It is immoral to continue these codified systems or rules that create such a segregated society.

Our policy visions need to match the scale of the problem. 50k units in 10 yrs is a start, but doesn't go far enough when looking at population growth trends and projections, and the low carbon footprint unique to habitation in Seattle. Seattle has incredible leverage or potential to reduce GHG/carbon emissions by providing space here for people to live. Our housing/zoning policies are not just about our small corner of the

planet, or the comfort of the few at the expense of the many. We need to be thinking about how we can affect a global impact on climate change mitigation, while providing the sorts of lower-cost space solutions that incubate businesses & ideas. Providing more space & flexibility within the planning & zoning boundaries of this city would allow for the growth this city so desperately needs. Below are a few ideas that thoughtful & engaged citizens (MOAR) have generated that could help us move forward. Ideas like these would provide more tools and opportunities to fill our desperate need

### **Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

### **Do you have other comments or suggestions related to the scope of the EIS?**

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to build. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for

condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Thank you for your service to this great city,

Hans Rasmussen  
301 14th Ave E, 98112

## ADUEIS

---

**From:** Mark Holland <solarhound@gmail.com>  
**Sent:** Sunday, October 29, 2017 9:02 PM  
**To:** ADUEIS  
**Subject:** ADU/DDU EIS SCOPING COMMENTS

ADUEIS,

Additional Comments:

Sewer line upgrade to 6 inch diameter should not be required for ADU/DADU's in single family zones.

Architectural style should be compatible with the existing house.

DADU's should have the first floor at ground level and be ADA accessible.

1. Number of ADU, DADU on a lot.

I support alternative 2, to allow one ADU and one DADU on a lot, as space allows.

2. Parking.

I support alternative 2.

3. Owner occupancy.

I do not support alternative 2.

Removing the owner occupancy requirement could lead to speculative development that could turn people against the whole concept of ADU/DADU's.

The owner occupancy requirement should be reduced to 3 months, instead of eliminated, to allow more flexibility for owners, prevent speculative development, and maintain neighborhood character.

4. Minimum lot size.

I support alternative 2.

5. Maximum square footage.

I support alternative 2.

#### 6. Maximum Height.

I do not support alternative 2.

I do not support raising the maximum height limit, except for narrower lots that would need the extra height to get a second floor.

23 feet is more than enough height for a 2 story structure, so there is no need to go higher.

Raising maximum heights will lead to bulkier structures that will upset neighborhoods and sour attitudes toward ADU/DADU development.

#### 8. Rear yard coverage limit.

I do not support alternative 2.

I am concerned the change to 60% coverage from 40% will result in the loss of too much green space and tree canopy coverage.

An increase to 60% coverage will also reduce outdoor open space for building occupants.

Lot coverage should remain at 40%, and instead encourage 1.5 to 2 story structures for extra interior space, and more outdoor ground level open space.

#### 9. Location of entries.

I partly support alternative 2 with exceptions.

The change to "any facade" is good, but the ten foot requirement from the lot side line is too wide a requirement, given that building side setbacks are only 5 feet in most houses.

Side setback requirements should be 5 feet for entrances, and rear setbacks should remain at 10 feet.

#### 10. Roof Features.

I do not support alternative 2, which seems redundant with 6. Maximum Heights.

The reason given for raising heights for roof features, like dormers, does not make sense because dormers are generally no higher than the roof peak, making a height increase unnecessary for most roof features.

Again, as with 6. Maximum Height, 23 feet is plenty for a two story structure. Increased height should only be allowed on narrower lots where the added height is needed to get a two story structure.

#### 11. Household size.

I support alternative 2.

Thank you,

Mark Holland  
2218 14th AVE. S.  
Seattle WA. 98144

## ADUEIS

---

**From:** Erin Bell <gbells3@yahoo.com>  
**Sent:** Sunday, October 29, 2017 9:10 PM  
**To:** ADUEIS  
**Subject:** Increasing square footage in garages with ADU

I would like to see the square footage to be increased in garages with upstairs Andy's. We are building on for our mother-in-law and would like to have less restrictions.

Erin Bell

[Sent from Yahoo Mail on Android](#)

**ADUEIS**

---

**From:** Mike.Barrett Susan.Ward <barrettmw@msn.com>  
**Sent:** Monday, October 30, 2017 8:52 AM  
**To:** ADUEIS  
**Subject:** proposal re ADUs and DAdUs

Generally, I am in favor of backyard cottages and separate units in houses. Many single people, couples, or single parents with a child or two can live comfortably and affordably in these units. I lived happily in an approximately 300 sq ft backyard cottage in Fremont for three years, and had single friends who lived in attached units in houses.

Backyard cottages can fit into the environment of a neighborhood, preserving green space, sunlight and privacy for neighbors, and be affordable for many. And only if some restrictions are put on them. The current height restrictions are appropriate. The current lot coverage restriction is appropriate. And the requirement of owner-occupancy is critical.

Without the owner-occupancy rule, we will soon have 2-3 rental units on a lot rather than 1-2 with one home owner. We decrease personal investment in the neighborhood. Concern with noise levels and maintenance of the lot will go down. Stability will decrease; turnover of residents will go up. This also results in fewer people on a block knowing each other, interacting, or watching out for each other.

Without the current lot coverage and structure size limits, more canopy is lost. More rainfall becomes storm runoff, having less soil to absorb it, and potentially contributes to another sewage disaster, such as that we had last winter. Residents have less green buffer between structures, and less privacy.

Greater height allowances on backyard structures block sunlight, skies, and open views from other houses, hemming them in.

Keep these current restrictions on ADU's and DADUs: maximum height of 15-23 ft depending on lot size, maximum backyard coverage of 40% including other structures, maximum square footage for DADUs of 800 sq ft including garage and storage structures, and home ownership in one unit.

And that backyard cottage I lived in once? It's now an air b& b. If you seriously want these units to increase the number of living units available in the city, this has to be dealt with. Air b&bs take units off the market for city renters. Restrict the number that can become air b&bs.

Thank you,

Susan Ward  
10330 Wallingford N  
Seattle 98103

206 527 4351

## ADUEIS

---

**From:** Jennifer Tanner <jenlovesbuster@gmail.com>  
**Sent:** Monday, October 30, 2017 9:58 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling proposed changes

The changes sought by Mr. O'brien are disastrous.

We already have the ability to add accessory dwellings without destroying the quality of life in any neighborhood in the city.

The proposed changes would obliterate the regulations that already allow these dwellings while keeping the quality of life for everyone involved intact.

Nobody benefits from the proposed changes except developers. Even the potential renters, who may believe they are moving into a neighborhood, will find they are moving into a chaotic nest of transient renters who intend to leave at the earliest possible financial convenience because they are moving into an area where all of the neighborhood qualities have been destroyed.

The proposed changes do not even require an owner to live on the premises. This means that developers will be buying older - and more affordable housing - to add more newer housing that will STILL rent for far more than the prior dwelling.

If we are going to be living cheek-by-jowl, the quality of life in a neighborhood matters. This proposal dooms that.

Please leave the accessory dwelling rules alone, as they are. Please stop feeding developer hogs at the municipal trough.

- Jennifer Tanner

## ADUEIS

---

**From:** Jim Codling <jimc@motoroilsupply.com>  
**Sent:** Monday, October 30, 2017 10:52 AM  
**To:** ADUEIS  
**Subject:** O brien nonsense

This proposal might fit San Francisco but not our city. We don't want the slum lords putting in mini houses in their back yards, bad enough but no parking NO that is a deal killer, these clowns that want the income from these little facilities need to move out to duval or someplace else ,, Stop the nonsense from O Brien and Sawant >>>>>>> stop enough  
Jim codling

**ADUEIS**

---

**From:** Nils Finne <nils@finne.com>  
**Sent:** Monday, October 30, 2017 11:11 AM  
**To:** ADUEIS  
**Subject:** Proposed zoning changes for backyard cottages

As a practicing professional architect for over 30 years, I would like to express my concerns about the proposed changes to the single family zoning regulations in the City of Seattle. I urge you to postpone action until all the ramifications of the proposals have been explored and documented. It is clear that the single family neighborhoods of Seattle are a vital part of the city's urban fabric, and the proposed changes have the capacity to introduce sweeping changes that could be very regrettable.

I find it striking that there is little or no visual documentation of the physical impact of allowing three residences on every single family property in the City of Seattle. It is true that planners often have little 3-dimensional understanding of the physical impact of zoning regulations. Why not commission a series of renderings and even videos showing the impact of the proposals on a typical neighborhood such as Wallingford or Queen Anne? The visual images should then be published in the *Seattle Times* so everyone can understand the issues at hand.

I would like to urge the City to work cooperatively with the neighborhoods and the Neighborhood Community Councils. These important local community groups have been left out of all discussions concerning the new zoning changes.

The proposed legislation by Councilmember O'Brien also commented "**no impact**" on all 109 questions concerning the environmental impact of the new legislation. The new policy greatly increases density with no required parking, reduces yard setbacks and increases building heights. **It is absurd to claim "no impact" to these changes.**

I urge the City to conduct a rational and sober process to evaluate and consider the proposed zoning changes. Otherwise, the character of our city may be irreparably damaged.

Sincerely,  
--Nils Finne, AIA

Nils Finne, AIA  
**FINNE** Architects  
3800 Woodland Park Ave N, Suite 300  
Seattle, WA 98103 tel. 206-467-2880  
[www.FINNE.com](http://www.FINNE.com)

**ADUEIS**

---

**From:** edgarrett2@comcast.net  
**Sent:** Monday, October 30, 2017 12:00 PM  
**To:** ADUEIS  
**Subject:** Single Family Lot Rezoning

Seattle City Council:

I am writing today to comment on the effect to the city regarding the Alternative 2 rezone of single family lots to allow multiple dwelling units.

The elimination of property ownership requirements will encourage rampant speculative development, affordable housing displacement, and conversion of every single-family neighborhood to three-unit rental communities.

The removal of requirements for providing a parking space on site for every residence can possibly turn the streets into one lane passages for two way traffic, as the demand for on street parking will increase. The no parking requirement for multiple new residences assumes they will be taking public transportation. The bus schedule in my neighbor has been reduced to a point making auto ownership and usage mandatory.

Reduction of the allowable minimum lot area from 4,000 sq. ft. to 3,200 sq. ft. will squeeze in more bulk, less open space, less trees, and less privacy, greater lot coverage with buildings together with more cars. More storm water runoff and less vegetation to absorb the water will place greater strain on the storm water sewer system. The Broadview neighborhood already has drainage issues.

Increasing allowable heights and larger footprints allowing for much larger backyard houses and garages results in drainage, light and privacy issues as well as a reduction in tree canopy,

Increasing the allowable number of unrelated people that occupy a property from 8 to 12 impacts the limited neighborhood infrastructure, a potential proliferation of boarding houses replacing single family homes, and much greater impacts to parking, traffic and mobility.

Alternative 2 will negatively impact the quality of life in the single family zones.

**In summary:**

Alternative 2 is out of scale and character for single family development.

It is incompatible with Single Family zoning.

It could potentially eliminate existing housing.

It will negatively impact vegetation, tree canopy, environmentally critical areas and the storm water sewage system.

Demand for on-street parking will outpace supply.

The visual character of the neighborhoods will be changed for the worse.

I strongly support Alternative 1 (No action).

Ed Garrett

**ADUEIS**

---

**From:** Mark von Walter <mvonwalter@comcast.net>  
**Sent:** Monday, October 30, 2017 12:05 PM  
**To:** ADUEIS  
**Cc:** Juarez, Debora; Sandy Motzer; Sandra Perkins; Ray Robinson; Kaplan, Martin  
**Subject:** Extend HALA ADU EIS Scoping

Seattle City Council  
 Aly Pennucci, City Council Central Staff

**PLEASE extend HALA EIS scoping**

With well over 200,000 potential new residential units already allowed by current zoning on underdeveloped Seattle properties, there is no immediate or compelling reason for the massive HALA ADU zoning changes proposed when so much housing opportunity already exists. The proposed HALA land use changes are the largest and most complex Seattle has ever experienced, but public scoping has been extremely limited. Significantly more time and community interaction are necessary to insure equitable community scoping before widespread rezoning proceeds, and alternatives need to be presented. There is no urgency given the generous housing provisions in existing zoning.

**infrastructure planning needs to be reviewed**

The EIS has not dealt with most of the significant issues that would be caused by the massive rezone. Increased infrastructure demands for public utilities, transportation, parking, policing, social services, and schools are significant. HALA would be much more than a zoning change, it is a significant re-envisioning of our city. The scope of changes requires ongoing community input, and extensive expert planning on how to accomplish the infrastructure needs. The EIS needs to comprehensively address each infrastructure and service issue before, not after a massive zoning change is enacted.

**neighborhood impacts are inequitable**

HALA's city wide ADU "one size fits all" up zone of all 300,000 Single Family properties ignores the unique physical and demographic characteristics of each Seattle neighborhood, and the variety of residential opportunities they offer. The HALA ADU zoning proposal was developed with minimal community input, and it ignores existing neighborhood planning. Existing SF neighborhood character would be dramatically changed. Significant reductions in SF lot size, addition of three units per lot, and eliminating parking as a city wide policy would affect all neighborhoods, and it inequitably impacts lower density neighborhoods typical in north Seattle. Large lot size platting patterns, intersecting ECAs, undeveloped alleys, lack of sidewalks, and greater distances to services pose a much larger HALA impact when compared to denser city neighborhoods. The EIS should evaluate the variability of impact on all neighborhoods.

**Economic impacts of HALA need to be evaluated**

Concerns of affordability are misconstrued; increasing the development potential of all SF sites will increase the land values, making them even less affordable. Property taxes will increase. The EIS needs to define impacts of both higher prices and resulting the tax increases on 300,000 existing single family homes.

The EIS should evaluate impacts of eliminating owner occupancy requirements for ADU development. Resulting developer speculation and investment pressure from out of the area will also impact affordability of existing SF homes based on experience in other cities.

The EIS should also consider the economic impacts of dramatic up zoning in some Urban Hubs. For example, Lake City HUV, which has lagged behind in the recent development boom, is currently zoned with 65' and 85' height limits, and it has a development potential of three to four times its existing residential population. HALA proposes some up zones to 140', a significant increase. This up zone was made by the HALA committee without neighborhood or property owner interaction, and was not part of recent envisioning or neighborhood planning. The EIS needs to consider the possibility that major height increase might actually reduce development by increasing the land values, in turn tempting land owners to wait longer for the market to afford much costlier building projects. The issue needs community level planning involvement.

HALA up zones would provide huge capitol gains for land owners, particularly in commercial zones. In order to equitably provide affordable housing, disabled housing, and homeless housing the EIS should evaluate a capitol gains recapture tax system. Development fees also need to be part of the review. Funding is particularly needed in our north end neighborhoods that lack sidewalks and alley improvements. A high percentage of low income and minority populations live in neighborhoods which need a disproportionate amount of public improvements.

**HALA discriminates against three classes of Seattleites**

HALA also poses some troubling discrimination issues. HALA ignores the lack of housing opportunities for Seattle's share of 21,000 the disabled population in King County. Land values in the city have forced most of our disabled population out of the urban area into less expensive suburban sites. Access to families, friends and services are unjustly strained. Seattle needs take responsibility for providing its fair share of disabled housing with at least the same determination it supports affordable housing. The EIS should identify the needs and provide quantified solutions for our disabled population.

A second discrimination issue is the the negative impact HALA has on seniors. High property taxes are already a significant issue for retired Seattle home owners, but HALA SF up-zoning and the resulting property tax increases will be an even greater burden. Adding to the financial impact of higher taxes, parking reduction will make mobility problematic. From personal experience, aging limits the of range pedestrian activities. Cars become more necessary for routine mobility. Eliminating parking requirements adds to street parking congestion and makes it more difficult, or even impossible in some neighborhoods, for senior access. The EIS needs to address mitigations for disproportionate impacts on seniors.

HALA's ADU zoning also discriminates against families with children. Like seniors, limiting parking has an impact on families with children who depend on vehicle travel for safe convenience. Lot size reduction, and increased density in existing SF will result in loss of yards for family recreation. It will discourage families with children who need recreation spaces traditionally offered on single family lots. The EIS needs to examine the scope of suburban exodus that HALA will cause among families with children.

**HALA alternatives**

Instead of HALA's universal ADU up zoning, it makes much more sense to address housing affordability and availability in an incremental process, neighborhood by neighborhood, with ongoing community input. By centering development density in and around Urban Hubs, more new housing would be accessible to services and transportation, and existing SF neighborhoods would not be subjected to drastic changes. The hubs could progressively and thoughtfully be enlarged over time as demand increases. The EIS needs to evaluate alternatives to HALA's blanket SF rezones.

Mark von Walter, Architect  
Cedar Park  
LCFF Planning and Land Use Committee Co-chair

Copy:  
CP Debora Juarez D5  
Sandy Motzer LCNA  
Ray Robinson LCFF PLUC  
Sandra Perkins FOCP  
Martin Kaplan QACC LURC

**ADUEIS**

---

**From:** L D Zobrist <lzobrist@aol.com>  
**Sent:** Monday, October 30, 2017 12:17 PM  
**To:** ADUEIS  
**Cc:** Kaplan, Martin  
**Subject:** Accessory Dwelling Units Environmental Impact Statement - Single Family Zoning Changes

Aly Pennucci, City Council Central Staff,

Our names are Lee & Jaclyn Zobrist and we live at 1615 11th AVE W in Seattle. We both grew up in Seattle and on Queen Anne Hill. We moved back to Seattle and Queen Anne with our family in the mid-1970's at a time when it was popular around the country for families to leave the city for the suburbs, resulting in many urban cores around the country losing their vitality and character.

Seattle mostly avoided this deterioration in part because of our strong, diverse neighborhoods for families surrounding the urban core, neighborhoods such as Capitol Hill, Fremont, Queen Anne, Central District and West Seattle, to name just a few, each with their own character and unique features. Single family neighborhoods with generally beautiful homes and yards have been an envious feature commented on by visitor to our city and has been an attracting feature for highly skilled workers coming to our city. We dare not destroy this special character of our city in a rush to accommodate the influx of new residents during this current boom. Booms come and go, but once housing changes have been implemented, we have to live with the effects for years to come.

We strongly object to the proposed zoning changes beyond what the city has already instituted, not long ago, until the full accumulate effects of the earlier changes have been studied over time to know what additions can be considered, if any, or what mitigations are required to maintain the vitality and character of Seattle. This current proposal is wildly extreme in its goals and dangerous to the livability of our city and would have great impact on our neighborhood. We urge that the EIS address all of the risks of these changes.

We have seen the effects of already existing zoning changes that allow three structures to replace one home on a small city lot. An architecturally beautiful home gets torn down and replaced by three unattractive three story, plus a roof deck, box houses lined up on the same lot leaving no yard. These changes are not enhancing our neighborhood, and they are causing serious parking and traffic problems on the narrow streets of our older neighborhoods.

Expanding an already generous recent expansion of single family zone from two to three living units on even smaller sized lots without parking and without any owner occupancy is the invitation for remote owners and speculators to destroy many of the existing classic single family home in our neighborhood in order to take advantage of getting to three units per small lot. These homes are replaced by multiple structures not in the character of our neighborhoods and adding significant parking and traffic woes to our narrow urban streets. As it is in many places now, vehicles can only travel in one direction at a time on a block because all on-street parking is full allowing only one traffic lane. It is important that the EIS thoroughly examine each of these factors in detail by neighborhood to assess the cumulative impact on each community based on the street capacity and infrastructure conditions of each neighborhood, to eliminate the "one size fits all" neighborhoods of the city proposal.

In summary, the proposed changes to single family zoning appear excessive in nature on most points and without adequate study of the impacts these changes will cause to the environment, the character of our neighborhoods, the

attractiveness of our city and on a personal note, the ability to continue to live in our home and conduct our lives with such potential increased density that this proposal will create.

Lee & Jaclyn Zobrist

---

This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

**ADUEIS**

---

**From:** Amy Carlson <amy.carlson@comcast.net>  
**Sent:** Monday, October 30, 2017 12:33 PM  
**To:** ADUEIS  
**Subject:** EIS for Accessory Dwelling Units

I was unable to submit my comments through the web. Below are my comments. Please respond to let me know that you have received these comments.

Comments on an EIS for  
Accessory Dwelling Units (ADUs): both Detached (DADU) and Attached (AADU)

Neighborhoods are the strength of Seattle. Why would we would we want to do anything to destroy that. I value Seattle's neighbors as they currently are: lawns, gardens, trees, squirrels, homes with significant setbacks from adjacent properties, homes with modest heights with few (no?) homes greater than two stories above grade level. I want these features preserved in the neighborhoods where these characteristics are the norm.

Do not do anything that would reduce the amount of off-street parking. Many of the older homes in Seattle have not provided for off street parking. In a neighborhood that is noted for single family homes, we currently have issues with enough off street parking. With the proposal of increasing the current allowable ADU's makes no sense . There is no indication that the number of cars in these neighborhoods are going to go down.

We currently have made major revisions in what is called urban villages. We have not evaluated the impacts of those changes to the livability of those neighborhoods. . Among these communities are: Ballard (south of about NW 58th), Downtown, Belltown, Lower Queen Anne (Uptown), Northgate, Pioneer Square, Capitol Hill, the International District, and South Lake Union. Before we make whole sale changes to our neighborhoods, evaluate the impacts of previous changes.

Sincerely  
Amy Carlson  
2603 Queen Anne Ave. N  
Seattle, WA

Amy Carlson  
2603 Queen Anne Ave N  
Seattle WA 98109-1822  
206-282-2927  
current: [Amy.Carlson@comcast.net](mailto:Amy.Carlson@comcast.net)  
stable: [Amy@TuringMachine.net](mailto:Amy@TuringMachine.net)

**ADUEIS**

---

**From:** Pam Johnson <pamelaj@windermere.com>  
**Sent:** Monday, October 30, 2017 1:31 PM  
**To:** ADUEIS  
**Subject:** comments on EIS for ADU/DADU changes and design review

To whom it may concern,

I recently attended your Scoping meeting at Hale's Ales on Thursday. There was much good information available...almost too much...and felt with the time available the program should have been divided into two separate meetings, with one devoted exclusively to the ADU/DADU discussion. The Q &A wasn't nearly long enough and the sound system was very poor.

The meeting reinforced my position, however, that we need very few changes in the current ADU/DADU policy. Both types of dwellings are underutilized in Seattle currently, and perhaps our energy should be spent in promoting the benefits of the program as it exists, with some tweaks.

Major concerns with Alternative 2, the O'Brien proposal: Owner occupancy requirement, minimum lot size, maximum square footage and height, lot and yard coverage and household size. Changing these guidelines from the existing plan would result in loss of trees, light, neighborhood scale and compatibility. Eliminating the owner occupancy requirement will lead to speculation by developers who have no stake in the neighborhood, and allowing 12 unrelated people in three structures on a 3200 square foot lot is a bad idea. And no parking? I'm trying to visualize this unpleasant scenario being acceptable to most adjacent property owners. Also, the cost of constructing a DADU is pretty high and out of the reach of many. While they may help alleviate some of the housing shortage, the rents most likely wouldn't be affordable. Better to promote the ADUs as far more cost effective and affordable. If people are really concerned about privacy, they probably wouldn't consider building either option. The third option: changing SF zoning to RSL seems like a gift to developers without adding to affordability, and if much of the current infill is any indication, would give little consideration to the visual character of their surroundings.

Then there's the issue of design, as outlined on the Seattle Planning Commission website. The backyard cottage examples cited are quite attractive for the most part and, reading the Design Review Board's neighborhood guidelines would lead one to believe that every new structure built in Seattle will be "aesthetically pleasing" and "timeless," respecting "neighborhood character." Even a cursory glance around any Seattle neighborhood reveals these guidelines ignored as the proliferation of formulaic, banal structures is becoming the norm. I don't believe people in general object to density, but they do object to ugliness, which is what we are getting. Alan Durning, the density advocate, mentions Seattle becoming more like Paris or Barcelona, among other beautiful, densely populated cities. Well, no. We will never be these cities, for obvious reasons, nor should we try. We haven't evolved that way as a much newer city. What Seattle could look to would be a city like Copenhagen, which has been more successful than most in integrating top-notch modern design with its historic fabric. Closer to home, look at the Grow development on Bainbridge Island. Good design doesn't have to be expensive, and we will be living with the results of our decisions for decades. It's imperative that we seriously consider what we want to look like without cramming more people into poorly-designed and built structures, just for expediency. Do we want to be Copenhagen or Hong Kong?

I look forward to more public hearings on these subjects.

Thank you.

Ned Johnson (M.Arch)

Pam Johnson (student of architectural history and lover of good modern design)

Pam Johnson

Managing Broker  
Premier Properties Director  
Windermere/Madison Park  
Office: 206.324.0000  
Mobile: 206.612.7754

**ADUEIS**

---

**From:** Welch, Nicolas  
**Sent:** Monday, October 30, 2017 3:24 PM  
**To:** ADUEIS  
**Subject:** FW: EIS for Adu and Dadus

**From:** Terry Abendroth [mailto:tabendroth@gmail.com]  
**Sent:** Monday, October 30, 2017 2:52 PM  
**To:** O'Brien, Mike <Mike.O'Brien@seattle.gov>; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>; Herbold, Lisa <Lisa.Herbold@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Burgess, Tim <Tim.Burgess@Seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>  
**Subject:** EIS for Adu and Dadus

Once again I am appalled at the city's outreach to neighborhoods. It appears the City of Seattle and certainly the Hala group are pushing for changes to single family zones regardless of environmental impacts or the citizens who live here. I attended a meeting put on at the Wallingford Center with Mike O'Brien which turned out to be an "info" mercial for Dadus or backyard cottages which looked a bit like lovely Martha Stewart designs.

My understanding of single family zones is that the touted 60%+ of the land is not accurate. This zone actually takes in the public schools and other quasi government buildings and land. That the actual amount of land currently designated single family is around 35%.

The impacts to this limited land, allowing multi-family perhaps on most pieces, can not be overstated.

I therefore support an open and fair assessment of the possible impacts through an honest EIS which is well-publicized with give and take and answers. One-sided decision making does not further our city, nor the residents, nor future residents.

Terry Abendroth

**ADUEIS**

---

**From:** Fran Conley <fran@roanokecap.com>  
**Sent:** Monday, October 30, 2017 4:41 PM  
**To:** Bagshaw, Sally; Johnson, Rob; Sawant, Kshama; Gonzalez, Lorena; O'Brien, Mike; Juarez, Debora; Harrell, Bruce; Gonzalez, Lorena; "Kirsten.HarrisTalley\"@seattle.gov; ADUEIS  
**Subject:** Proposed changes to permit accessory dwelling units.

Any change to permit more accessory dwelling units should consider the following:

1) Impact on local community "neighborliness". Particularly now, people want and choose specific neighborhoods. With so many institutions breaking down, neighbor are frequently a source of identification, unity, and strength. Many people have worked all their lives to have a home of their own, and this home should not be taken from them.

One way to address this is to have similar housing units together, not one small bungalow next to a big apartments building.

2) What if this DADU doesn't work? Dont ruin all the neighborhoods at once, and then say "woops!" Maybe an experiement is ok, but not everywhere.

3) It's good for the city for people to walk in their neighborhoods.

It's good for the people. A neighborhood of small homes, or big one, or apartment buildings can be pleasant. A hodgepodge of everything , without unifying architecture, setbacks, or greenery, does not make for pleasant walking.

4) Why not try incentives... ie infrastructure? A neighborhood of

3-to-5 story buildings can be pleasant if there is some unifying architecture and greenery, and IF before ok'ing this zoning the city plans for the parks, walkways, libraries, bus service, and small stores the area will need. IT is essential to understand the costs of densification, and to have the developers pay a large share of these costs.

The primary obligation of the city and its representatives is to support the people who are already here, the people who elected them. It is not to support developers, or people who may or may not move here in the future. Let's build out within the existing codes, and take the time to identify areas where the city can put in rich infrastructure and then permit significant densification.

Thank you,

Fran Conley

## ADUEIS

---

**From:** Jessica Westgren <jwestgren82@gmail.com>  
**Sent:** Monday, October 30, 2017 6:39 PM  
**To:** ADUEIS  
**Cc:** Johnson, Rob  
**Subject:** Alternative 2- Voicing my Support

Good evening,

I was unable to attend the meeting this last Thursday, on October 26th, to offer my support for Alternative 2 for Accessory Dwelling Units EIS. My name is Jessica and I am a renter in Wallingford. I am a founding member of Welcoming Wallingford and lament not being able to be at the event, especially after hearing the protest that was organized by the Wallingford Community Council. I hope to stress with this email that the WCC does not speak for the neighborhood of Wallingford as a whole.

Alternative 2 would be a wonderful zoning change that will unlock more affordable housing. My neighborhood can, and should, do it's part to absorb the density that is spreading across Seattle. I have broken down the aspects of Alternative 2 which I believe will be great for housing affordability in our single family neighborhoods.

**1. A single-family lot can have an AADU and a DADU:** the majority of our home lots are 5000 sq ft. That is more than enough space to add both an AADU and a DADU. I think if a homeowner wants to edit their house to add on another rental and then also add another rental in their yard, we should allow them to have that option.

**2. No off-street parking required:** This is probably the most important aspect of Alternative 2. We do not require homeowners to use their garages or driveways for their cars. Why should we make that requirement of renters? Until there is a requirement that single family homeowners *must* supply their own parking, then it is not equitable to expect the same of the renter population. Convenient, free, curb-side parking is **public** space and does not belong to the homeowners in the neighborhood. They may have enjoyed having this public space as an amenity, but the reality is that that space is **public** and should belong to anyone, regardless on it they are property owners.

I also reject the notion that all renter's have cars. In a neighborhood like Wallingford, we have access to both North/South bus lines, East/West bus lines and the Burke Gilman bike trail. Just because an AADU or a DADU is built doesn't mean that a car is going to come along with the new tenant. Again, it is not equitable to penalize renters who have cars but allow property owners with cars to own public roadway space.

**3. No owner occupancy:** Thank you for considering this amendment. Requiring an owner to live on property has nothing to do with neighborhood safety. The arguments I have seen from neighborhood councils quote concerns that if the owner doesn't live on site, the renter will not treat the property with care. It is a stereotype to assume that renters will not care for their living environment. As a renter in her mid-thirties, if I was able to find an affordable DADU or an AADU, I would do everything I could to be considered a valuable asset to the community. Renters know that if they find a good deal on a home that they should do whatever they can to stay in good standing with their landlord and neighboring units. This belief aside, if we truly want more affordability, we need to minimized barriers to entry. Owner Occupation is definitely a barrier for people who are hoping to add an accessory unit.

**11. Household size:** If we are going to reduce barriers to building additional units on their property, then it makes sense that we increase the allowable household size. Arguments can be made that occupancy standards are discriminatory. There is no occupancy standards to single family homes if everyone is related. However, if a group of people who are not related by blood or family want to live together, then they are held to occupancy standards. Having Alternative 2

acknowledge the reality that increasing the units you have on a single family property should lead to the reality that more persons can live on that property, is a good first step.

I would like to close by thanking you for reading this email and considering my position. I have many peers who would love to be able to find a DADU and an ADU, and as you are aware, it can be hard to get feedback from the renter populations when it comes to complicated city land-use proposals. Knowing that you read my email and comments makes me feel like I have done right by my neighborhood, my demographic, and my fellow-renters.

Thank you for your time and attention.

Sincerely,

Jessica Westgren

**ADUEIS**

---

**From:** Sandra Perkins <sandraperkins@seanet.com>  
**Sent:** Monday, October 30, 2017 8:08 PM  
**To:** ADUEIS  
**Subject:** Comments re Scope of EIS ADU/DADU legislation

To whom it may concern:

My husband and I own a single family home in the Cedar Park neighborhood in NE Seattle. I am submitting these comments re the scope of the Accessory Dwelling Units Environmental Impact Statement. I am very concerned that this proposed legislation will have drastic negative impacts on my neighborhood and single-family neighborhoods all across the city.

I ask that the City please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Seattle's single-family neighborhoods are incredibly important to the character of the City, and this proposed legislation could ruin them forever.

**Introduction - CM O'Brien wants to Completely Reverse the Existing Backyard Cottage Legislation:**

This new legislation proposes to overturn the existing codes and was formally titled "Removing Barriers to Backyard Cottages (DADU) and Accessory Dwelling Units (ADU)." The existing code was studied from 2006 through 2009 by the Seattle Planning Commission who consulted with experts and professionals from around the country who identified potential significant impacts to single family properties and neighborhoods. During that review, the Seattle Planning Commission arrived at the current code that took into consideration many potential significant impacts to all single-family zoned neighborhoods and almost every property and home. Some 8 years later, the very same assumptions and codes remain current in relationship to environmental impacts, even though CM O'Brien and others think we should give up our rights as single-family homeowners and renters.

CM O'Brien's new proposed legislation seeks to overturn every code the Seattle Planning Commission and experts felt was critical in protecting and preserving the rights of every homeowner, renter, neighborhood, and single-family zoned land while offering opportunities to increase density. In addition, as was presented during the QACC appeal hearing and memorialized within the hearing tapes, almost every proposal CM O'Brien seeks to overturn is unprecedented anywhere in the U.S. The City studied 59 other cities across the U.S. and in no city, do their codes allow for what CM O'Brien proposes; in fact, considerably less and even less than our existing codes.

**Comparison of Alternatives - Potential Impacts**

'At the start of the EIS process, the City invites us, the public, to comment on what the City should study during a specific scoping period. The scoping period alerts the City to areas of concern early in the process. During this period, the public helps the City identify topics that need the most thorough review and the range of issues they should study.'

**Proposed Scope**

In December 2016, because of the QACC appeal, the Seattle Hearing Examiner ruled in her decision that a thorough review of the proposal's potential environmental impacts through an EIS was necessary and required by the law. Based on this decision, the City has preliminarily identified the following elements of the environment for analysis in the EIS. The current code is listed in Alternate 1 and is noted as No Action. Alternative 2 is CM O'Brien's proposed changes and are listed in **red**. The concerns in italics were expressed within the QACC Appeal, proven in the hearings and further explained within the [Hearing Examiner's Decision](#). I have added my own comments to those concerns.

**Alternative 1 (No Action-Leave Existing Code)**

**Alternative 2 - O'Brien's Proposal**

- |          |  |  |   |
|----------|--|--|---|
| <b>1</b> | <b>Number of residences allowed on a single-family lot</b> | <b>A single-family lot can have one House, plus either one AADU or one DADU, but not both.</b> | <b>A single-family lot can have one house, plus an AADU and plus a DADU - 3 residences.</b> |
|----------|--|--|---|

***Concerns:*** *During the Seattle Planning Commission (SPC) comprehensive study between 2006 and 2009 of allowing Backyard Cottages on single family properties, the SPC believed that in order to preserve the character of the neighborhoods like every other city in the United States, they should limit the number of residences per lot. The SPC determined that if a house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft was reasonable considering all the other codes defining single-family properties, open space, setbacks, tree canopy preservation and lot coverage. In addition, the SPC believed that allowing a Mother-in-law (AADU) residence of similar size to be constructed within a home also preserved the character of the neighborhood. The SPC, along with every other city in the U.S. did believe strongly that allowing both to be built in addition to a home would forever change the character and convert these properties to multi-family use and negatively impact scale, and the character of the neighborhoods. The SPC also felt strongly that increasing the number of residences, people and families per site may have significant impacts upon utilities like water service, sewer and storm water drainage, and electrical, phone and broadband as well. Remember that when the City was platted 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or tripling the density on a single-family lot and neighborhood street.*

*I agree completely with the SPC's findings on these matters, and I ask that the alternative of "make no changes" be analyzed and adopted by the City. This proposed change would have far-reaching and drastic impacts on my neighborhood and other single family neighborhoods across the City, and would unduly burden infrastructure in most single family neighborhoods.*

- |          |                |   |  |
|----------|----------------|---|--|
| <b>2</b> | <b>Parking</b> | <b>One off-street parking space required for an AADU or DADU unless the lot is in an urban village.</b> | <b>No off-street parking required.</b> |
|----------|----------------|---|--|

***Concerns:*** *Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge have wider streets, newer utilities and bigger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence. The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may contribute 6 or more*

*cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.*

*This proposed change should be carefully analyzed, as changing this requirement would alter forever the character of single family neighborhoods. While the City would like to imagine that Seattle citizens can give up their cars and ride transit or bicycles, this is wishful thinking that is not supported by facts. New residences need to provide for off-street parking. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |   |                        |   |  |
|---|------------------------|---|--|
| 3 | <b>Owner-occupancy</b> | <b>An owner must occupy either the main house or the AADU/DADU 6 months a year.</b> | <b>No requirement for an owner to occupy the house, the AADU, or the DADU.</b> |
|---|------------------------|---|--|

**Concerns:** *The Seattle Planning Commission together with other cities across the U.S. believed strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, the SPC required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment to their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year. In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family rental properties and either add them to their portfolios or sell them with little regard for their neighbors or neighborhoods. CM O'Brien wants to eliminate all ownership requirements and allow developers to accumulate and convert single family homes to multi-family properties allowing for three homes per property. During the QACC appeal, the City's own witnesses agreed that there would be speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.*

*This is the worst feature of the proposed legislation. It is completely unacceptable. I ask that the alternative of “make no changes” be analyzed and adopted by the City. This part of the legislation would completely destroy single-family neighborhoods in Seattle.*

- |   |                                    |                          |                          |
|---|------------------------------------|--------------------------|--------------------------|
| 4 | <b>Minimum lot size for a DADU</b> | <b>4,000 square feet</b> | <b>3,200 square feet</b> |
|---|------------------------------------|--------------------------|--------------------------|

**Concerns:** *Originally between 2006 and 2009 the Seattle Planning Commission determined through careful comparison studies concerning lot size around the U.S. in cities that allowed Backyard Cottages that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that has remained in the code. Now CM O'Brien wants to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon their own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000.*

*Even the City's own evidence does not support this change, which would have negative impacts on neighborhood all over Seattle. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |   |                        |  |   |
|---|------------------------|--|---|
| 5 | Maximum square footage | AADU 1,000 square feet, including garage and storage areas DADU 800 square feet including Garage and storage areas | AADU 1,000 square feet, excluding garage and storage areas DADU 1,000 square feet, excluding garage and storage areas |
|---|------------------------|--|---|

**Concerns:** Originally between 2006 and 2009 we on the Seattle Planning Commission determined through considerable research that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., the SPC felt strongly that Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air and trees, and preserving the qualities of single family neighborhoods with respect to privacy, etc. 300 Backyard Cottages have been built under this current code since 2010 and due to the expense and lot coverage restrictions, they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger homes, and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most cases opening up the size limits would severely impact others while on some lots of much greater size, perhaps some new accommodation might be able to be considered.

This proposed change would have negative impacts all over Seattle. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- |   |                |   |   |
|---|----------------|---|---|
| 6 | Maximum height | No change from existing height limits, which vary by lot width and range from 15-23 feet. | Height limits are 1-3 feet higher than existing limits, depending on lot width. |
|---|----------------|---|---|

**Concerns:** The SPC felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. I agree with the SPC, and I feel strongly that that any proposed increases directly correspond to lot sizes well above the minimums already set at 4,000 sq ft.

- |   |                    |  |
|---|--------------------|--|
| 7 | Lot coverage limit | 35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet. |
|---|--------------------|--|

**Concerns:** Again, I strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under CM O'Brien's proposal, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference is allowable square feet of coverage could translate to much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- |   |                          |   |   |
|---|--------------------------|---|---|
| 8 | Rear yard coverage limit | 40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage) This limit applies in addition to the overall lot coverage limit. | 60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent. |
|---|--------------------------|---|---|

**Concerns:** *Again, I strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The 20% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |   |                            |   |   |
|---|----------------------------|---|---|
| 9 | <b>Location of entries</b> | <b>DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.</b> | <b>DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).</b> |
|---|----------------------------|---|---|

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would have the greatest impacts. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |    |                      |   |   |
|----|----------------------|---|---|
| 10 | <b>Roof features</b> | <b>No exceptions from the height limit are allowed for roof features on accessory structures.</b> | <b>Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.</b> |
|----|----------------------|---|---|

**Concerns:** *The exceptions CM O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom. I see significant opportunities for common abuse and believe it should remain limited as is. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |    |                       |  |   |
|----|-----------------------|--|---|
| 11 | <b>Household size</b> | <b>Any number of related people, or Up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.</b> | <b>Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.</b> |
|----|-----------------------|--|---|

**Concerns:** *The current code allows 8 unrelated to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. The City has seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. CM O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within CM O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts and burdens. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

12 MHA requirements                      **Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.**

***Concerns:*** *I do not have concerns about this.*

13 Rental Registration                      **Property owners renting one or more units, including in Single Family & Inspection Ordinance                      zones, must register for inspections to ensure housing is safe and meets (RRIO)                      basic maintenance requirements.**

***Concerns:*** *I do not have concerns about this.*

Please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Thank you for considering my comments.

Sandra Perkins  
13226 42<sup>nd</sup> Ave NE  
Seattle, WA 98125

## ADUEIS

---

**From:** Michael Ruffo <mruffo@gmail.com>  
**Sent:** Monday, October 30, 2017 8:34 PM  
**To:** ADUEIS  
**Subject:** Support for ADUEIS

Hello,

I'd like to express my support for this regulatory change. I'd also like to express that I don't feel that there are any potential significant adverse environmental impacts.

Thank you,

Michael Ruffo  
3227 19th Ave S.  
Seattle, 98144

**ADUEIS**

---

**From:** Dale Durran <dale\_tmp1@mac.com>  
**Sent:** Monday, October 30, 2017 8:41 PM  
**To:** ADUEIS  
**Subject:** Comments regarding the Scope of EIS ADU/DADU legislation

To whom it may concern:

I and my wife own a single family home in NE Seattle. I am submitting these comments regarding the scope of the Accessory Dwelling Units Environmental Impact Statement. I am very concerned that this proposed legislation will have drastic negative impacts on my neighborhood and single-family neighborhoods all across the city.

I ask that the City please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Seattle's single-family neighborhoods are incredibly important to the character of the City, and this proposed legislation could ruin them forever.

**Introduction - CM O'Brien wants to Completely Reverse the Existing Backyard Cottage Legislation:**

This new legislation proposes to overturn the existing codes and was formally titled "Removing Barriers to Backyard Cottages (DADU) and Accessory Dwelling Units (ADU)." The existing code was studied from 2006 through 2009 by the Seattle Planning Commission who consulted with experts and professionals from around the country who identified potential significant impacts to single family properties and neighborhoods. During that review, the Seattle Planning Commission arrived at the current code that took into consideration many potential significant impacts to all single-family zoned neighborhoods and almost every property and home. Some 8 years later, the very same assumptions and codes remain current in relationship to environmental impacts, even though CM O'Brien and others think we should give up our rights as single-family homeowners and renters.

CM O'Brien's new proposed legislation seeks to overturn every code the Seattle Planning Commission and experts felt was critical in protecting and preserving the rights of every homeowner, renter, neighborhood, and single-family zoned land while offering opportunities to increase density. In addition, as was presented during the QACC appeal hearing and memorialized within the hearing tapes, almost every proposal CM O'Brien seeks to overturn is unprecedented anywhere in the U.S. The City studied 59 other cities across the U.S. and in no city, do their codes allow for what CM O'Brien proposes; in fact, considerably less and even less than our existing codes.

**Comparison of Alternatives - Potential Impacts**

'At the start of the EIS process, the City invites us, the public, to comment on what the City should study during a specific scoping period. The scoping period alerts the City to areas of concern early in the process. During this period, the public helps the City identify topics that need the most thorough review and the range of issues they should study.'

**Proposed Scope**

In December 2016, because of the QACC appeal, the Seattle Hearing Examiner ruled in her decision that a thorough review of the proposal’s potential environmental impacts through an EIS was necessary and required by the law. Based on this decision, the City has preliminarily identified the following elements of the environment for analysis in the EIS. The current code is listed in Alternate 1 and is noted as No Action. Alternative 2 is CM O’Brien’s proposed changes and are listed in **red**. The concerns in italics were expressed within the QACC Appeal, proven in the hearings and further explained within the [Hearing Examiner’s Decision](#). I have added my own comments to those concerns.

- **Alternative 1 (No Action-Leave Existing Code)**

**Alternative 2 - O’Brien’s Proposal**

1 Number of residences allowed on a single-family lot

A single-family lot can have one House, plus either one AADU or one DADU, but not both.

**A single-family lot can have one house, plus an AADU and plus a DADU – 3 residences.**

***Concerns:*** *During the Seattle Planning Commission (SPC) comprehensive study between 2006 and 2009 of allowing Backyard Cottages on single family properties, the SPC believed that in order to preserve the character of the neighborhoods like every other city in the United States, they should limit the number of residences per lot. The SPC determined that if a house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft was reasonable considering all the other codes defining single-family properties, open space, setbacks, tree canopy preservation and lot coverage. In addition, the SPC believed that allowing a Mother-in-law (AADU) residence of similar size to be constructed within a home also preserved the character of the neighborhood. The SPC, along with every other city in the U.S. did believe strongly that allowing both to be built in addition to a home would forever change the character and convert these properties to multi-family use and negatively impact scale, and the character of the neighborhoods. The SPC also felt strongly that increasing the number of residences, people and families per site may have significant impacts upon utilities like water service, sewer and storm water drainage, and electrical, phone and broadband as well. Remember that when the City was platted 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or tripling the density on a single-family lot and neighborhood street.*

*I agree completely with the SPC’s findings on these matters, and I ask that the alternative of “make no changes” be analyzed and adopted by the City. This proposed change would have far-reaching and drastic impacts on my neighborhood and other single family neighborhoods across the City, and would unduly burden infrastructure in most single family neighborhoods.*

2 Parking

One off-street parking space required for an AADU or DADU unless the lot is in an urban village.

**No off-street parking required.**

***Concerns:*** *Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge have wider streets, newer utilities and bigger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one’s residence. The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city’s neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may contribute 6 or more*

*cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.*

*This proposed change should be carefully analyzed, as changing this requirement would alter forever the character of single family neighborhoods. While the City would like to imagine that Seattle citizens can give up their cars and ride transit or bicycles, this is wishful thinking that is not supported by facts. New residences need to provide for off-street parking. I ask that the alternative of "make no changes" be analyzed and adopted by the City.*

- |   |                        |   |  |
|---|------------------------|---|--|
| 3 | <b>Owner-occupancy</b> | <b>An owner must occupy either the main house or the AADU/DADU 6 months a year.</b> | <b>No requirement for an owner to occupy the house, the AADU, or the DADU.</b> |
|---|------------------------|---|--|

**Concerns:** *The Seattle Planning Commission together with other cities across the U.S. believed strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, the SPC required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment to their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year. In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family rental properties and either add them to their portfolios or sell them with little regard for their neighbors or neighborhoods. CM O'Brien wants to eliminate all ownership requirements and allow developers to accumulate and convert single family homes to multi-family properties allowing for three homes per property. During the QACC appeal, the City's own witnesses agreed that there would be speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.*

*This is the worst feature of the proposed legislation. It is completely unacceptable. I ask that the alternative of "make no changes" be analyzed and adopted by the City. This part of the legislation would completely destroy single-family neighborhoods in Seattle.*

- |   |                                    |                          |                          |
|---|------------------------------------|--------------------------|--------------------------|
| 4 | <b>Minimum lot size for a DADU</b> | <b>4,000 square feet</b> | <b>3,200 square feet</b> |
|---|------------------------------------|--------------------------|--------------------------|

**Concerns:** *Originally between 2006 and 2009 the Seattle Planning Commission determined through careful comparison studies concerning lot size around the U.S. in cities that allowed Backyard Cottages that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that has remained in the code. Now CM O'Brien wants to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon their own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000.*

*Even the City's own evidence does not support this change, which would have negative impacts on neighborhood all over Seattle. I ask that the alternative of "make no changes" be analyzed and adopted by the City.*

- 5 **Maximum square footage**      **AADU 1,000 square feet, including garage and storage areas DADU 800 square feet including Garage and storage areas**      **AADU 1,000 square feet, excluding garage and storage areas DADU 1,000 square feet, excluding garage and storage areas**

**Concerns:** Originally between 2006 and 2009 we on the Seattle Planning Commission determined through considerable research that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., the SPC felt strongly that Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air and trees, and preserving the qualities of single family neighborhoods with respect to privacy, etc. 300 Backyard Cottages have been built under this current code since 2010 and due to the expense and lot coverage restrictions, they have been mostly respectful of neighbors and neighborhoods. **Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger homes, and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most cases opening up the size limits would severely impact others while on some lots of much greater size, perhaps some new accommodation might be able to be considered.**

This proposed change would have negative impacts all over Seattle. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- 6 **Maximum height**      **No change from existing height limits, which vary by lot width and range from 15-23 feet.**      **Height limits are 1-3 feet higher than existing limits, depending on lot width.**

**Concerns:** The SPC felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. I agree with the SPC, and I feel strongly that that any proposed increases directly correspond to lot sizes well above the minimums already set at 4,000 sq ft.

- 7 **Lot coverage limit**      **35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.**

**Concerns:** Again, I strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under CM O'Brien's proposal, a 3,200 sq ft lot could cover 1,480 sq ft which equates to 46.25%. This huge difference in allowable square feet of coverage could translate to much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. **This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size.** I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- 8 **Rear yard coverage limit**      **40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage) This limit applies in addition to the overall lot coverage limit.**      **60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.**

**Concerns:** Again, I strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The 20% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. I ask that the alternative of “make no changes” be analyzed and adopted by the City.

- |                       |  |  |
|-----------------------|--|--|
| 9 Location of entries | DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way. | DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way). |
|-----------------------|--|--|

**Concerns:** The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would have the greatest impacts. I ask that the alternative of “make no changes” be analyzed and adopted by the City.

- |                  |  |  |
|------------------|--|--|
| 10 Roof features | No exceptions from the height limit are allowed for roof features on accessory structures. | Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses. |
|------------------|--|--|

**Concerns:** The exceptions CM O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom. I see significant opportunities for common abuse and believe it should remain limited as is. I ask that the alternative of “make no changes” be analyzed and adopted by the City.

- |                   |   |  |
|-------------------|---|--|
| 11 Household size | Any number of related people, or Up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU. | Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12. |
|-------------------|---|--|

**Concerns:** The current code allows 8 unrelated to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. The City has seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. CM O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within CM O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts and burdens. I ask that the alternative of “make no changes” be analyzed and adopted by the City.

12 MHA requirements                      **Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.**

***Concerns:*** *I do not have concerns about this.*

13 Rental Registration                      **Property owners renting one or more units, including in Single Family & Inspection Ordinance                      zones, must register for inspections to ensure housing is safe and meets (RRIO)                      basic maintenance requirements.**

***Concerns:*** *I do not have concerns about this.*

Please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Thank you for considering my comments.

Dale Durran  
13033 42nd Ave NE  
Seattle, WA 98125

## ADUEIS

---

**From:** Michelle Sink <michellesink@hotmail.com>  
**Sent:** Monday, October 30, 2017 9:08 PM  
**To:** ADUEIS  
**Subject:** Comments on the scope of EIS ADU/DADU legislation

---

To whom it may concern:

My husband and I own a single family home in the Cedar Park neighborhood in NE Seattle. I am submitting these comments re the scope of the Accessory Dwelling Units Environmental Impact Statement. I am very concerned that this proposed legislation will have drastic negative impacts on my neighborhood and single-family neighborhoods all across the city.

I ask that the City please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Seattle's single-family neighborhoods are incredibly important to the character of the city, and this proposed legislation could ruin them forever.

Thank you for considering my comments.

Michelle Sink  
13533 41st Ave NE  
Seattle, WA 98125

**ADUEIS**

---

**From:** Richard Lewis <rmlewis@uw.edu>  
**Sent:** Monday, October 30, 2017 9:45 PM  
**To:** ADUEIS  
**Subject:** Proposed changes to ADU/DADU rules

To whom it may concern,  
There is no question that we need more density in the city. The problem is if you increase density too quickly you will cause housing prices to fall. This will negatively impact the amount of property tax collected. Without having a plan to cover that shortfall, essential public services are likely to suffer. The housing problem was a long time in the making and a more thoughtful approach to increasing density than the, "just let the market decide" method might be prudent. Allowing for all single family properties to be converted into triplexes without an owner-occupant rule will flood the housing market too quickly to maintain a stable tax base. It might recover in time or not. I do not have sufficient information to predict.

If I could be so bold to recommend, change one rule at a time. First eliminate the parking requirement and look at the impact. Then perhaps move to the reduced lot size requirement and look at the impact. Introduce one change at a time and compare the number of additional permits issued to what would have been issued. That would make it easy to see if the additional density requirements are being met. If just enough additional housing is being produced it shouldn't be a problem to keep housing prices flat for a long enough time to let inflation fix our affordable housing problem without creating a bigger budget problem. While I am not an economist by training, I am a data scientist with a MBA and I would be happy to help assess the impacts of the policy change if it would be helpful.  
Thank you for your time and consideration.  
Rick Lewis

## ADUEIS

---

**From:** mark a. foltz <markafoltz@alum.mit.edu>  
**Sent:** Tuesday, October 31, 2017 12:52 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units EIS: Scoping Comment Form

Please see the attached for my comments on the ADU EIS. If you have any trouble viewing the attachment, please let me know.

Thank you,  
Mark



ADU/DADU EIS Scoping - Google Docs.pdf

## ADUEIS

---

**From:** Joseph Pizzorno <mail2@drpizzorno.com>  
**Sent:** Tuesday, October 31, 2017 9:11 AM  
**To:** ADUEIS  
**Subject:** No to converting single family zoning to high density!

Please stop converting livable Seattle into high density, poor life quality, high density crowding!

I have watched what happened in Ballard and it is terrible. Looks like the only ones helped by this are the developers.

We do not have the road or utility infrastructure to handle an ever increasing population density.

Dr. Joseph Pizzorno, ND  
Editor-in-Chief, *Integrative Medicine, A Clinician's Journal*  
President, SaluGenecists, Inc  
Treasurer Board of Directors, Institute for Functional Medicine  
Founding President, Bastyr University

Newest book: *The Toxin Solution*  
[www.thetoxinsolution.com](http://www.thetoxinsolution.com)

**ADUEIS**

---

**From:** Tiare Mathison <tiare2@icloud.com>  
**Sent:** Tuesday, October 31, 2017 9:25 AM  
**To:** ADUEIS  
**Subject:** Support for Expanding Housing

Dear Leaders.

Thank you for taking the comments submitted seriously. My thoughts are based in stories.

My houseless neighbor, Josh, sleeps behind a local business, gets coffee from a local cafe, and I make him breakfast 5 days out of 7. He has limited mobility due to an injury received in a fight at a previous shelter. His case manager has found a spot for him in pioneer Square but Josh is afraid to go there. He wants to live in Wallingford. He had been a renter here but it turns out, with an unsavory Landlord. Also, Josh is schizophrenic and smokes like a chimney. He is a perfect candidate for an ADU or a Tiny House.

I walk all over Wallingford, Roosevelt and the University neighborhoods. There are plenty of streets with mixed housing, single family dwellings, apartment buildings, duplexes, etc, that appear to have been here for quite some time. How is it that single family dwellings are the only way to go in some parts of Wallingford? This reinforces the “haves against the have-nots”. Sharing lots with multiple dwellings makes house g so much more affordable.

I know this reality very well. I am a renter and due to the economic downfall of 2008-2010, I will never be able to buy a home again. Mixed use housing makes it possible for me to stay in Wallingford where I work.

Thank you.

Rev. Tiare Mathison, Pastor  
Wallingford Presbyterian Church  
1414 N 42nd  
Seattle, WA. 98103  
641-840-0109  
Tiare2@me.com

## ADUEIS

---

**From:** Levy, Susie  
**Sent:** Tuesday, October 31, 2017 11:28 AM  
**To:** Karen Juhl; ADUEIS  
**Subject:** RE: Backyard cottages

Hi Karen,

I am forwarding your comment to my colleague who is capturing the comments for the EIS.

Thanks!  
Susie

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

**From:** Karen Juhl [mailto:karen.e.juhl@gmail.com]  
**Sent:** Wednesday, October 25, 2017 10:01 PM  
**To:** Levy, Susie <Susie.Levy@seattle.gov>  
**Subject:** Backyard cottages

Hi Susie,

I wanted to reach out to you regarding the backyard cottages and the proposed changes. I was wondering what the process is for submitting requests for consideration in changing the square footage requirements to the current changes from the propose 3200 to 3000

Thanks,

karenjuhl

**ADUEIS**

---

**From:** Kim Klaffky <kim@lakere.com>  
**Sent:** Tuesday, October 31, 2017 11:54 AM  
**To:** ADUEIS  
**Subject:** Support of ADU DADU Legislation

To Whom It May Concern:

We support the proposed updates to Seattle's ADU/DADU legislation.

ADU/DADUs increase available housing options for renters in the city rather than encouraging sprawl and increased traffic issues by sending potential tenants to surrounding cities. Larger unit size also helps provide space for families by being able to accommodate what is frequently only a studio or one bedroom under existing rules.

More flexibility with the legislation also supports existing homeowners, as well as people buying (or hoping to buy) in the Seattle by providing income opportunity that can make home ownership more affordable. Whereas minimum lease lengths of 30 days or more may be helpful to curb AirBnB-like trends, long term tenants are good neighbors and the income can permit people to stay in their home as costs of home ownership rise.

My husband and I are in the Cedar Park neighborhood in Seattle and support ADU and DADU legislation that provides flexibility and increased affordable housing options by utilizing existing homes as resources to accommodate people being able to afford living in their home, access to income opportunity to help become people become home owners, and access to affordable homes for renters.

Thank you.

Sincerely,

Kimberly Klaffky and John Kelly

**ADUEIS**

---

**From:** Andrew Kirsh <andrewkirsh@hotmail.com>  
**Sent:** Tuesday, October 31, 2017 1:21 PM  
**To:** ADUEIS  
**Subject:** Scoping comments

The HALA/MHA DEIS used faulty calculations to assert that upzoning single-family zones to Lowrise would have a negligible effect on tree canopy coverage. It greatly overestimated Lowrise tree canopy by assuming that Lowrise zones are built out, whereas in fact, Lowrise zones contain many parcels with single family houses and high tree canopy coverage, and it is these parcels that contribute most of the tree canopy in Lowrise zones. For example, an analysis of five blocks in the Capitol Hill Lowrise zone revealed that 56-90% (average, 73%) of the tree canopy coverage on each block was contributed by parcels that still have houses, which had far higher canopy coverage than parcels with Lowrise structures. Any tree canopy coverage figures you use to assess impacts on tree canopy coverage should reflect the actual structure types on specific parcels, not the zoning map. The map is not the territory.

For the potential beneficial impacts of Alternative 1, what is the potential for increasing the city's tree canopy in unplanted backyard open spaces that would be lost in Alternative 2? What are the benefits of retaining trees that would be destroyed under Alternative 2?

For the impacts of Alternative 2, what is the potential loss of tree canopy due to destruction of trees to make room for ADUs? The impact of Alternative 2 on tree canopy should recognize both the opportunity cost above and the loss of existing trees.

How much will Alternative 2 incentivize the destruction of existing SF houses and scraping of lots to rebuild closer to the street to maximize the backyard area available for ADUs, with concomitant loss of trees, green space, and replacement of existing older houses with new houses that are more expensive (gentrification)?

How will tree canopy loss be mitigated, given that replacement in the ROW is not possible if street trees are already present and/or if overhead utilities preclude the planting of trees that will reproduce the canopy volume lost to ADU development? Because many of the benefits of trees are local (cooling, cleaner air, psychological benefit of nature in the living environment, aesthetics) and not mitigatable through planting at remote sites, legislation to protect existing trees is preferable to attempted mitigation but, at the least, tree removal should require a fee to support the maintenance and expansion of Seattle's urban forest. Any proposed action that would require the removal of an Exceptional Tree should trigger design review.

How much will Alternative 2 incentivize the clearing of trees before houses are put on the market, in order to make them more attractive for ADU construction by prospective buyers?

Once a parcel with the original house and one or two ADUs is put on the market, how much will the cost be increased by the presence of the ADU(s)? What effect on housing affordability will this *de facto* conversion of single-family to multifamily properties have?

It is known that increasing the area of impermeable surface around the Sound increases harmful bacterial

counts in the Sound and sewer/stormwater releases. How will increasing impermeable surface area in large areas of the City affect Puget Sound's ecology?

How will increased stormwater runoff be mitigated? How much will mitigation of increased stormwater runoff cost the average taxpayer in Seattle?

What impacts of increased noise and light will occur under Alternative 2?

The allowance of both an AADU external to the original structure and a DADU on the same property allows excessive lot coverage. There should be an additional alternative that maintains significant open, green space.

**ADUEIS**

---

**From:** marian gillis <mariangillis@gmail.com>  
**Sent:** Tuesday, October 31, 2017 1:14 PM  
**To:** ADUEIS  
**Subject:** Re: Scoping comment period extended for ADU/Backyard Cottage Environmental Impact Statement

YES.

We need ADU's that are regulated by design ( see Santa Monica, online).  
 This si the best way to impact the housing crisis for everyone.

I have been fortunate to enjoy a middle class life and to own and develop many homes.  
 The cost of housing in Seattle today, is open to a very small market, that makes it risky.

Most of that market is serving, out of Seattle investor's, who often purchase and hold a property, making it a dark dead space. This is not good for neighborhoods. Having active homes and people is in our best interest as community members of all ages and needs.

Neighborhoods serve a variety of people from birth to death. A 6 year old and a 66 year old need sidewalks, eyes on the street; we need each other.

When housing is for a small select few, we loose what distinguishes us from the rest and gives us Value in every sense of the word.

MG

Limited Electrical Power

[https://www.ecowatch.com/whitefish-contract-cancellation-2503767937.html?utm\\_source=EcoWatch+List&utm\\_campaign=193bda8a35-EMAIL\\_CAMPAIGN&utm\\_medium=email&utm\\_term=0\\_49c7d43dc9-193bda8a35-85397421](https://www.ecowatch.com/whitefish-contract-cancellation-2503767937.html?utm_source=EcoWatch+List&utm_campaign=193bda8a35-EMAIL_CAMPAIGN&utm_medium=email&utm_term=0_49c7d43dc9-193bda8a35-85397421)

Electrical Power+

[326455921http://www.independent.co.uk/environment/germany-grids-paying-electricity-customers-renewable-energy-power-surplus-wind-solar-generation-a8022576.html?utm\\_content=buffer1acda&utm\\_medium=social&utm\\_source=twitter.com&utm\\_campaign=buffer](http://www.independent.co.uk/environment/germany-grids-paying-electricity-customers-renewable-energy-power-surplus-wind-solar-generation-a8022576.html?utm_content=buffer1acda&utm_medium=social&utm_source=twitter.com&utm_campaign=buffer)

On Tue, Oct 31, 2017 at 11:00 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Good morning,

On October 2, we began the environmental review process to [study](#) the effects of removing barriers to creating accessory dwelling units (ADUs), often called in-law units and backyard cottages, in single-family zones. The first phase

of the Environmental Impact Statement (EIS) process is to determine the scope of our analysis. Thank you to everyone who has submitted comments with suggestions for what we should consider in our study.

We know there's a lot of interest in this topic, and we want to make sure we're hearing from everyone who would like to participate. To give people more time to submit comments on our [alternatives](#) and [proposed scope](#), **we are extending the scoping comment period 15 days to November 16**. We have also published the [comments](#) received as of October 30 through the online comment form, by email, and at the two scoping meetings. (We are still reviewing comments and may not have posted every comment received to date; we will post all submitted comments with the final scoping report.)

### **What are we proposing?**

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The objectives of our proposal are to:

- make it easier for property owners to permit and build ADUs and backyard cottages
- increase the number and variety of housing choices available in single-family zones
- encourage creation of small-scale, family-friendly homes affordable to a range of households

The proposal we're studying involves allowing both an attached and detached ADU on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, this EIS will review the potential environmental impacts of the proposal.

### **What is scoping?**

Before we begin the environmental analysis, the scoping phase is a chance to hear your ideas for the alternatives and types of impacts we should focus on. Scoping is not when we consider *whether* to implement certain policy changes — that occurs after we've completed the EIS process, and you'll have opportunities to weigh in on the proposal then.

You can send us a scoping comment in several ways:

- use our [online comment form](#)
- email us at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- write to Aly Pennucci, City Council Central Staff, PO Box 34025, Seattle, WA 98124-4025

For more information about the ADUs, backyard cottages, and the EIS process, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

Thank you for being involved in this project.

Aly Pennucci and Nick Welch

## ADUEIS

---

**From:** Rudy Young <rudyyoungaia@gmail.com>  
**Sent:** Tuesday, October 31, 2017 1:27 PM  
**To:** ADUEIS  
**Subject:** Remove parking requirements for DADU on small lots.

I would like to remove the off street parking requirements for DADUs on small lots. There are numerous narrow lots in Seattle that cannot easily accept an additional parking space without impacting the lots appearance. Meaning adding a parking space on a cramped lot will make the yard into a parking lot!

I would say eliminate added parking space for lots less 40' wide or less than 3000 sf (numbers are just a guess and would need refining).

All other aspects of the DADU requirements would remain the same (no 2 story DADU off of alley of small narrow lot for instance). Maybe also ensure lot is within certain distance of major bus lines (just like the multi family code)

Would like to participate and assist with diagrams etc if needed.

Rudy D Young AIA  
Architect. WA OR CA  
Mobile 206-419-4082

**ADUEIS**

---

**From:** Paul Shukovsky <paulshukovsky@hotmail.com>  
**Sent:** Tuesday, October 31, 2017 1:52 PM  
**To:** ADUEIS  
**Cc:** Paul Shukovsky  
**Subject:** Scoping comment on proposed attached dwelling unit regulation changes

Please carefully consider the negative impact on neighborhood diversity--particularly with respect to elderly and physically handicapped persons--if the new regulatory environment maintains any parking regulations that create barriers to the construction of ADUs.

In particular, attached garages in houses that do not back up to an alley are often functionally prohibited from being converted into ADUs--including handicapped-accessible ADUs--by current parking regulations requiring off-street parking as measured by distance from the street.

The consequence of the current regulations means that elder people or others who become handicapped and seek to create accessible living space in their homes by converting an attached garage into an ADU are often foreclosed from that option if they don't back up to an alley. Under current regulations, often times the portion of the attached garage closest to the street and the space between the front of the garage (driveway) and the street must be maintained as off-street parking. This impediment to converting such an attached garage to an ADU should be eliminated.

Although I would like see such barriers completely disappear, one possible compromise would be to greatly diminish the number of feet required for off-street parking as measured from the street to accommodate just the width of sidewalk and parking strip as well as the length of a subcompact such as many of the hybrid or electric vehicles on the market.

The new regulations should explicitly remove such regulatory barriers, thereby allowing handicapped people to remain in their homes and Seattle's elderly population to age in place. Such a course would serve these special populations and underscore the city's commitment to address pivotal diversity issues in our neighborhoods that cross all racial, gender and ethnic lines.

Paul Shukovsky  
Seattle resident  
Paulshukovsky@hotmail.com

## ADUEIS

**From:** don\_news@mail-2b8z3.getresponse.com on behalf of Seattle Department of Neighborhoods <newDON@seattle.gov>  
**Sent:** Tuesday, October 31, 2017 2:49 PM  
**To:** Pennucci, Aly  
**Subject:** Seattle Department of Neighborhoods Newsletter

View this email [online](#) if it doesn't display correctly



**Seattle  
Neighborhoods**

**NEWSLETTER**

### Message from the Director

*I recently saw a post that said “bring back the neighborhood voice.” I thought this was interesting, and it raised a few questions for me.*

*First, where did the neighborhood voice go? That’s really a rhetorical question. I can honestly say that the neighborhood voice is alive and well and it never went away. In fact, it has been amplified...but we can discuss that in a future post.*



*The bigger question I had was what is the neighborhood voice, or better yet, WHO is the neighborhood voice? The statement “bring back the neighborhood voice” makes it sound like there is just one voice that represents all neighborhoods—one voice being the representative opinion.*

*That’s a huge responsibility, as well as unrealistic. This is exactly why we are working so hard to broaden access points and create more opportunities to participate. There is not one voice that speaks for all of us just as there is not one way to engage everyone.*

View this email [online](#) if it doesn't display correctly

*Who is the neighborhood voice? It's you, and me, and virtually everyone we know. We are all unique with our experiences, and we have a wide array of opinions. It's one of the few things we all have in common - we are neighbors! So, bring back the neighborhood voice? We are working to lift it up, move it forward, and have it be heard.*

**- Kathy Nyland, Director of Seattle Department of Neighborhoods**



**Get Helpful Tips and Information for Calling 911**



**Get up to \$5,000 in Funding for Your Community Project: Apply by December 1**



View this email [online](#) if it doesn't display correctly

**Seeking New Commissioners to Join the Seattle Youth Commission**

**Join the Conversation about the City of Seattle's Annual Comprehensive Plan Update**

## OTHER CITY NEWS

**Scoping Comment Period Extended for ADU/Backyard Cottage Environmental Impact Statement** *To give people more time to submit comments, the scoping comment period has been extended 15 days to November 16. ([more](#))*

**2017 Seattle Public Safety Survey** *The purpose of the survey is to solicit feedback on public safety and security concerns from those who live and/or work in Seattle. A report on the survey results will be provided to the Seattle Police Department. ([more](#))*

**Engaging Aging Forum to Focus on Women, Equity, and Optimal Aging** *Save the date! Age Friendly Seattle is hosting this forum on November 6. Equity topics include economic security, the intersection of ageism, racism, and sexism, caregiving, home ownership, employment, women's health, and more. ([more](#))*

**Park Inspection Volunteers Needed for New Program** *A new program invites community members to assist Seattle Parks and Recreation in regularly surveying our parks in a systematic and transparent way. ([more](#))*

**Read the City of Seattle Growth and Livability Report** *This report highlights how City planning, policies, partnerships, and investments across multiple departments are working together to maintain a high quality of life as we grow. ([more](#))*

**Green Seattle Day is November 4** *Join hundreds of volunteers planting thousands of plants in parks throughout the Emerald City. All community members are welcome! ([more](#))*

**Free Sandbags for Flood-Prone Areas** *Storm season is underway and Seattle Public Utilities (SPU) is offering a limited number of free, filled sandbags to households or business owners in flood-prone areas. ([more](#))*

**The Why, When and How of Encampment Cleanups** *Learn about the City's strategies for addressing the public health and safety issues that accompany many of the unauthorized encampments around Seattle. ([more](#))*

**Attend an Advocacy Camp on November 16** *Advocacy Camp informs young professionals interested in local, state and national politics how to best advocate for the issues most important to them and their community. ([more](#))*

**Civic Cocktail - City Hall in Motion & #MeToo: November 1, 6pm ([more](#))**

**Seattle Renters' Commission Meeting: November 6, 6pm ([more](#))**

## ADD YOUR VOICE

View this email [online](#) if it doesn't display correctly

The City of Seattle wants your feedback. The projects listed below are currently open for public comment. Let us know your thoughts.

- Accessory Dwelling Units Environmental Impact Statement (EIS) ([Learn More](#))
- Puget Sound Regional Council's Draft Centers Framework Proposal ([Learn More](#))
- Seattle Resilience Survey ([Learn More](#))
- 2017 Seattle Public Safety Survey ([Learn More](#))

For a full list of projects open for public comment, visit our [website](#).

## **SOUTH SEATTLE** *(neighborhoods south of I-90)*

**Lincoln Park South Play Area Renovation Survey** *Seattle Parks and Recreation is interested in finding out more about how you use the south play area at Lincoln Park and what you'd like to see for improvements.* ([more](#))

**Historic Georgetown Steam Plant Powers Graphic Novel** *The Seattle Office of Arts & Culture, in partnership with Seattle City Light has selected David Lasky and Mairead Case to create a fictionalized graphic novel about the historic Georgetown Steam Plant.* ([more](#))

**West Seattle Community Access and Parking Questionnaire** *Provide your feedback by October 31.* ([more](#))

**Longfellow Creek Celebration** *Bring your neighbors, friends, and family to celebrate over 25 years of community engagement with Longfellow Creek on November 5, 2017.* ([more](#))

### **EVENTS**

- Boo Bash at the Beach: October 31, 4-7pm ([more](#))
- Judkins Park Station Access Study Final Workshop: November 2, 5:30pm ([more](#))
- Columbia & Hillman City Neighborhood Meet & Greet: November 2, 6:30pm ([more](#))
- South Park Resource Fair: November 4, 10am-2pm ([more](#))
- Delridge Grocery Cooperative Annual Member Meeting: November 4, 10am ([more](#))
- Somali Health Board's 5th Annual Health Fair: November 4, 9am ([more](#))
- Longfellow Creek Celebration: November 5, 1-4pm ([more](#))
- Know the Code - Understanding Seattle's Rental Regulations: November 6, 1pm ([more](#))
- Free Bilingual Legal Clinic: November 8, 6pm ([more](#))

## **CENTRAL SEATTLE** *(neighborhoods between the Ship Canal & I-90)*

**Changes for Late Night Parking in Capitol Hill** *To better manage parking in Capitol Hill, Seattle Department of Transportation will now charge for parking until 10 pm so that visitors have an easier chance to find parking near their destinations.* ([more](#))

**Seattle Parks and Recreation Needs Input for Renovation of David Rodgers Park Play**

View this email [online](#) if it doesn't display correctly

**Area** *This project will replace play equipment, provide access for people with disabilities, and improve safety and other features at the park.* ([more](#))

**Landmarks Preservation Board to Consider Nomination of 55 Bell Street Building for Landmark Status** *The public is invited to attend the meeting on November 15 and make comments regarding the nomination.* ([more](#))

## EVENTS

- Swedish First Hill Standing Advisory Committee Meeting: November 1, 5:30pm ([more](#))
- Queen Anne Community Council Meeting: November 1, 7:30pm ([more](#))
- Light Up Your Ride 2017 - Bicycle Commuting & Safety Meet-up: November 2, 7-9am ([more](#))
- Judkins Park Station Access Study Final Workshop: November 2, 5:30pm ([more](#))
- Seattle Hmong New Year 2017: November 4, 11am-6pm ([more](#))
- Madison Park Community Council Meeting: November 6, 7pm ([more](#))
- Belltown Community Council - OVG KeyArena Presentation: November 8, 6pm ([more](#))
- Stop the Bleed Training: November 11, 9am-12pm ([more](#))
- Capitol Hill Design Guidelines Update Open House: November 16, 5pm ([more](#))
- North Downtown Mobility Action Plan Community Workshop: November 18, 10am-4pm ([more](#))

## NORTH SEATTLE *(neighborhoods north of the Ship Canal)*

**Seattle Parks and Recreation Begins Repairs on Burke-Gilman Trail Sections in Northeast Seattle** *This project will repair sections of the trail, remove areas of asphalt in disrepair, remove invasive roots that are causing upheaval, and replace those sections with new asphalt.* ([more](#))

**Northwest Seattle Community Meeting Scheduled for November 6** *Northwest Seattle residents, employees, and businesses are invited to a community open house as well as an informational meeting for Seattle City Light's seven surplus properties in the area.* ([more](#))

**28th Avenue Street Murals in Lake City** *Working through Seattle Department of Transportation's "Pavement to Parks" program, 28th Avenue NE is receiving a vibrant street mural in addition to painted crosswalks to bookend the street to provide safer pedestrian passage.* ([more](#))

## EVENTS

- University/Ravenna Neighborhood Meet & Greet: November 1, 6:30pm ([more](#))
- Lake City World Dance Party: November 3, 6-9pm ([more](#))
- Ballard Community Open House: November 6, 6-7pm ([more](#))
- City Light NW Seattle Property Disposition Community Information Meeting: November 6, 7pm ([more](#))

View this email [online](#) if it doesn't display correctly

- Aurora Licton Urban Village November Meeting: November 9, 7pm ([more](#))
- City of Seattle/University of Washington Committee Advisory Committee Meeting: November 14, 6:30pm ([more](#))
- Lake City Community Conversation: November 15, 6:30pm ([more](#))
- Christie Park Addition Public Meeting: November 16, 6pm ([more](#))

## RESOURCES

[Land Use Bulletin](#)  
[Seattle Area Construction Look Ahead](#)  
[Seattle Department of Transportation Alerts](#)  
[Seattle Customer Service Bureau](#)  
[Office of the Mayor](#)  
[Seattle City Council](#)  
[Seattle Parks & Recreation Activities](#)  
[Seattle Public Library Events](#)

## TAKE ACTION

[Submit an Event to Our Online Calendar](#)  
[Submit Public Comment](#)

## FOLLOW US

**Facebook:** [SeattleNeighborhoods](#)  
**Twitter:** [@SeaNeighborhood](#)  
**Instagram:** [seattle\\_neighborhoods](#)  
**YouTube:** [Seattle Neighborhoods](#)  
**Neighborhoods Blog:** [Front Porch](#)

*Header image: Participants at the 2016 Northgate Neighborhood Halloween Pumpkin Party - a Neighborhood Matching Fund project (photo by Thomas Uemoto)*



**Seattle**  
Neighborhoods

**Street:** 600 4th Avenue, 4th Floor; Seattle, WA 98104  
**Mail:** PO Box 94649; Seattle, WA 98124-4649  
**Phone:** 206-684-0464 **Fax:** 206-233-5142  
**Website:** [seattle.gov/neighborhoods](http://seattle.gov/neighborhoods)



Seattle Department of Neighborhoods, PO Box 94649, Seattle, WA 98124, United States

You may [unsubscribe](#) or [change your contact details](#) at any time.

## ADUEIS

---

**From:** Glenn Pittenger <glenn.pittenger@gmail.com>  
**Sent:** Tuesday, October 31, 2017 3:07 PM  
**To:** ADUEIS  
**Subject:** More comments for DADU EIS scoping

Since you are allowing us more time, and since you have published some of the current feedback, I'm submitting an additional suggestion, which I believe is a good compromise between Alt 1 & Alt 2. I also feel it minimizes the issues raised by some.

Alternative 1.5 — a compromise to keep the majority happy, on both sides of the debate

1. Allow the smaller lot to host a DADU as proposed in Alt 2
2. Allow the larger size & increased height as proposed in Alt 2
3. Don't count garage or storage against the DADU, as proposed on Alt 2
4. Keep off street parking requirement except in areas with frequent transit (using city/metro def) or in areas where SDOT can document plentiful parking (25% availability on a street measured 3 different days and times in a week). An example of the 25% availability — 85th Ave NE between 4th Ave NE and Latona is never more than 50% full for on street parking, and could actually use more on street parking to help calm traffic on this residential street (it is used as a shortcut by speeding drivers).
5. Keep owner occupancy requirement but allow it to be satisfied if the owner's main residence is in the city of Seattle and the owner is an identifiable individual/family (not an LLC/Corp). Allow individuals/families to have, at most, 2 properties that have DADUs that are on properties not directly occupied. Also make waivers straightforward to obtain, such as a person doing a 2 year peace corps trip upon retirement, or a person spending a few years away for grad school, a person living with an ill relative, etc.
6. Allow only both a DADU & ADU (as proposed in Alt 2) in cases where the lot is over 6,000 SqFt and both ADUs have off street parking (except in cases with frequent transit or plentiful on street parking as noted earlier)
7. Allow greater flexibility for parking access and placement. Such as allowing curb cut-throughs even in cases where the property has an alley (currently, DPD rules preclude curb cut-throughs when a lot has an alley).
8. Allow greater flexibility around DADU placement. Allow in side yards, or even in front yards. Also allow increase the allowed coverage in the requires rear yard.

### Reasoning:

Allowing 1000 SqFt cottages increases the ability to move houses from other properties (set for demolition), onto a new lot that can host it as a DADU, helping to preserve old architecture and affordable architecture, and helping to reduce the cost of a new DADU (a small house can be moved for around \$40K).

Allowing higher heights and not counting garage square footage against the DADU allows for a DADU to be built over a garage.

Allowing 2 ADUs on a property, only for larger lots, decreases the impact of the expanded DADU program in areas that might already be fairly dense.

Keeping the parking requirement (except in areas with frequent transit or plentiful parking) reduces the on-street parking impact.

Keeping the owner occupancy requirement (with noted exceptions) decreases the stated fear that corporations will turn all of the SF parcels into corporate owned triplexes.

Regards,  
Glenn Pittenger

Also, this comment is not part of my suggestion, but information to be used to analyze the issue raised by those that say we don't have the needed infrastructure, such as sewer capacity. It would be useful to leverage the work published by Sightline that shows that many areas of Seattle currently have less density than they did in 1970, and most of these areas are in the existing Single Family zones. Allowing more ADUs in these areas, might get them back to the populations they had in 1970.

**ADUEIS**

---

**From:** Welch, Nicolas  
**Sent:** Tuesday, October 31, 2017 3:10 PM  
**To:** ADUEIS  
**Subject:** FW: accessory dwelling units

---

**From:** Levy, Susie  
**Sent:** Friday, October 20, 2017 3:07 PM  
**To:** Barbara Lycett <blycettlandscapes@gmail.com>  
**Cc:** Pennucci, Aly <Aly.Pennucci@seattle.gov>; Welch, Nicolas <Nicolas.Welch@seattle.gov>  
**Subject:** RE: accessory dwelling units

Thank you Barbara for this feedback. I am including my colleagues who are working on this as well to capture your comments.

Best,  
Susie

**From:** Barbara Lycett [<mailto:blycettlandscapes@gmail.com>]  
**Sent:** Monday, October 09, 2017 12:07 PM  
**To:** Levy, Susie <[Susie.Levy@seattle.gov](mailto:Susie.Levy@seattle.gov)>  
**Subject:** accessory dwelling units

Hello Susie,

I am writing in response to Mike O'Brien's request for feedback from the community on Accessory Dwelling Units (ADUs). As a landscape designer working in Seattle, I have a lot of clients who are interested in adding ADUs to their properties. The primary barrier to such construction on most Seattle lots is the city's Stormwater Code. Other barriers include lot coverage and restrictions related to wetlands. The code seems to have been based on principals that work well for large buildings and subdivisions, but do not translate to urban single family lots.

The Stormwater Code includes many good ideas for reducing, slowing, collecting and filtering stormwater. However, most of the code is very poorly implemented by housing developers and builders. I understand that the council wants to reduce restrictions and I'd like to highlight some of the problems that I've run across with stormwater code failures:

- The biofiltration and rain garden systems often fail within two years and require inordinate amounts of maintenance, largely because the builders and the city inspectors do not understand basic horticultural principals. They install the wrong plants in the wrong places. Homeowners do not know how to maintain their systems.
- The code requires builders to replace trees they remove and they often either plant the trees too close together or plant them incorrectly and the trees fail within a few years.

- City inspectors do not check to make sure that stormwater overflows are handled correctly, resulting in pools of water collecting on sidewalks and walkways.
- Builders never use the proper soils required by the Stormwater Code. They use cheap imitations sold by Pacific Top Soils. City inspectors cannot tell the difference, but any landscaper or horticulturist can. Use of incorrect soils results in failure of the the stormwater infrastructure.
- The code is based on many stormwater solutions that simply don't work, defeating the purpose. For example, the code permits the use of so-called permeable pavers. These pavers clog up within one to two years, resulting in a call to a landscaper to install drains feeding into the combined stormwater and sewage system.

I'd be happy to talk with you further about this issue. I will be out of town for about a month but can be in contact via email. The bottom line is that properties with ADU's should be allowed to have more non-permeable surface area and to have their roof drains enter the combined stormwater and sewage system.

Regards,  
Barbara Lycett

Barbara Lycett, APLD  
Certified Landscape Designer  
Barbara Lycett Landscape Design  
[blycettlandscapes@gmail.com](mailto:blycettlandscapes@gmail.com)  
206-784-2521

## ADUEIS

---

**From:** D.B. Hurley <specshipx@hotmail.com>  
**Sent:** Tuesday, October 31, 2017 3:24 PM  
**To:** ADUEIS  
**Subject:** DADU

I think the exemption from off-street parking is a great idea. In multi-family housing areas they have no such requirement. What about installing city sewer lines on alleys? In hilly Seattle, this would make sense since the road is often above the grade of the backyard.

Brad Hurley  
6601 39th Ave SW  
Seattle, WA 98136

**ADUEIS**

---

**From:** Gregory Vouros <gcvsea@yahoo.com>  
**Sent:** Tuesday, October 31, 2017 3:25 PM  
**To:** ADUEIS  
**Subject:** ADUEIS Comments

I would like to know who exactly is requesting that attached and detached accessory dwelling units be allowed in single family zoning. I doubt it is the current owners of those single family homes, who purchased those homes with the understanding their neighborhoods would not be over developed. I do think it is the advisory group of developers whose members the city selected as a way to rubber stamp the city's intent to increase density within the city at all cost.

The proposal to eliminate off street parking requirements is THE most short sided part of this proposal, unless the City staff acknowledges that their intent is to create a shortage of on street parking as a means to discourage residents from owning cars and forcing them to use our inadequate public transportation system. Our streets do not have adequate parking as it is, as caused by the City's installation of bike lanes, "parklettes", the abundance of no parking zones, the increase in 3 minute parking zones, etc. Seattle is intent on removing as many parking spaces off property and on property as possible from its streets.

How about building the public transportation infrastructure BEFORE attempting to dramatically increase the number of potential riders? The current proposals illustrate extremely poor planning if any at all.

I would also like the city to clearly state that if ADUs are approved, the owners of the property CAN NOT subdivide the parcels. I say that because I think that will be the next domino to fall, just as the requirements to have the units be owner occupied.

I am not sure who is driving this bus, but it is not the owners of the parcels.

Greg Vouros  
2120 8th Ave West

## ADUEIS

---

**From:** Brook Ellingwood <brook@brookellingwood.com>  
**Sent:** Tuesday, October 31, 2017 3:37 PM  
**To:** ADUEIS  
**Subject:** ADU EIS Comments.

I am a long time resident of Seattle, having moved here in 1990. I have been a homeowner since 1999. Our current house, which we purchased over 10 years ago is in an urban village and two years ago we added a legal ADU to the basement.

Following are my opinions on the ADU EIS.

1. Number of ADUs allowed on a single-family lot.

I support Alternative 2: A single-family lot can have an AADU and a DADU.

This can help extend the lifespan of existing housing stock and preserve overall neighborhood character, while relieving housing pressure.

2. Parking

I support Alternative 2: No off-street parking required.

This can make it practical for more homeowners to create ADUs. Absorbing the extra cars is painful at first, but over time other transportation options will make it possible for more people to not own cars.

3. Owner-occupancy

I *strongly* support Alternative 2: No requirement for an owner to occupy the house, AADU, or DADU.

This will help homeowners maintain investment in their properties as they age through different life stages, while also relieving housing pressure.

4. Minimum lot size for a DADU

I *somewhat* support Alternative 1: 4,000 square feet.

I do, however, believe many smaller lots could support DADUs well, and would like to see a relaxed procedure for obtaining a variance when it makes sense.

5. Maximum square footage

I support Alternative 2:

AADU 1,000 square feet, excluding garage and storage areas

DADU 1,000 square feet, excluding garage and storage areas

6. Maximum height

I *somewhat* support Alternative 2: Height limits are 1-3 feet higher than existing limits, depending on lot width.

I'm not sure I understand the cases in which this would matter.

7. Lot coverage limit

I have no opinion.

8. Rear yard coverage limit

I support Alternative 2: 60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.

Existing rules seem arbitrary and can create a lot of unusable space.

9. Location of entries

I support Alternative 2: DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

This will make it practical for more homeowners to build DADUs, relieving housing pressure.

10. Roof features

I support Alternative 2: Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.

This not only will allow more interior space, but will also make it easier to design buildings similar in style to historical housing stock, helping preserve the character of neighborhoods.

1. Household size

I \*somewhat\* support Alternative 2: Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

My support is tempered by concern that the city should not find itself in the position of telling people what “related” means.

12 MHA requirements

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

Perhaps it should apply to one unit if there is both an AADU and a DADU?

13 Rental Registration & Inspection Ordinance (RRIO)

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

I support this.

--

Brook Ellingwood  
C: 206.484.5419

**ADUEIS**

---

**From:** Elaine <elainescherba@gmail.com>  
**Sent:** Tuesday, October 31, 2017 3:40 PM  
**To:** ADUEIS  
**Subject:** Fwd: Comments re Scope of EIS ADU/DADU legislation

To whom it may concern:

My husband and I have owned our single family home on Queen Anne for over 30 years. We strongly support the comments and concerns submitted by Sandra Perkins (see below).

Decisions about our neighborhood should be made by those of us who live here and own property. The City Council, elected by the citizens, should represent their neighborhoods and not the big-money interests of developers and corporations like Amazon.

We live in our single family neighborhoods because we like them. If we wanted to live in high-density settings, we would have chosen to live elsewhere. Queen Anne hill already suffers from severe traffic congestion related to South Lake Union development. Additional density will only add to the problems. I also believe the EIS will conclude that it will do nothing to make housing more affordable to the poor or middle class. The O'Brien Proposal will simply provide more housing for highly compensated programmers who prefer a short commute to South Lake Union jobs.

In addition, regarding the language of O'Brien's Proposal to destroy our single family neighborhoods, please have the courtesy to discontinue referring to multi-family, non-owner occupied dwellings without off-street parking as "single family lots". The language is as offensive as the proposed changes.

Sincerely,

Elaine Scherba  
509 Crockett Street  
Seattle, WA 98109

---

**From:** Sandra Perkins [<mailto:sandraperkins@seanet.com>]  
**Sent:** Monday, October 30, 2017 8:08 PM  
**To:** 'ADUEIS@seattle.gov'  
**Subject:** Comments re Scope of EIS ADU/DADU legislation

To whom it may concern:

My husband and I own a single family home in the Cedar Park neighborhood in NE Seattle. I am submitting these comments re the scope

of the Accessory Dwelling Units Environmental Impact Statement. I am very concerned that this proposed legislation will have drastic negative impacts on my neighborhood and single-family neighborhoods all across the city.

I ask that the City please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Seattle's single-family neighborhoods are incredibly important to the character of the City, and this proposed legislation could ruin them forever.

### **Introduction - CM O'Brien wants to Completely Reverse the Existing Backyard Cottage Legislation:**

This new legislation proposes to overturn the existing codes and was formally titled "Removing Barriers to Backyard Cottages (DADU) and Accessory Dwelling Units (ADU)." The existing code was studied from 2006 through 2009 by the Seattle Planning Commission who consulted with experts and professionals from around the country who identified potential significant impacts to single family properties and neighborhoods. During that review, the Seattle Planning Commission arrived at the current code that took into consideration many potential significant impacts to all single-family zoned neighborhoods and almost every property and home. Some 8 years later, the very same assumptions and codes remain current in relationship to environmental impacts, even though CM O'Brien and others think we should give up our rights as single-family homeowners and renters.

CM O'Brien's new proposed legislation seeks to overturn every code the Seattle Planning Commission and experts felt was critical in protecting and preserving the rights of every homeowner, renter, neighborhood, and single-family zoned land while offering opportunities to increase density. In addition, as was presented during the QACC appeal hearing and memorialized within the hearing tapes, almost every proposal CM O'Brien seeks to overturn is unprecedented anywhere in the U.S. The City studied 59 other cities across the U.S. and in no city, do their codes allow for what CM O'Brien proposes; in fact, considerably less and even less than our existing codes.

### **Comparison of Alternatives - Potential Impacts**

'At the start of the EIS process, the City invites us, the public, to comment on what the City should study during a specific scoping period. The scoping period alerts the City to areas of concern early in the process. During this period, the public helps the City identify topics that need the most thorough review and the range of issues they should study.'

### **Proposed Scope**

In December 2016, because of the QACC appeal, the Seattle Hearing Examiner ruled in her decision that a thorough review of the proposal's potential environmental impacts through an EIS was necessary and required by the law. Based on this decision, the City has preliminarily identified the following elements of the environment for analysis in the EIS. The current code is listed in Alternate 1 and is noted as No Action. Alternative 2 is CM O'Brien's proposed changes and are listed in **red**. The concerns in italics were expressed within the QACC Appeal, proven in the hearings and further explained within the [Hearing Examiner's Decision](#). I have added my own comments to those concerns.

**Alternative 1 (No Action-Leave Existing Code)**

- |   |   |   |  |
|---|---|---|--|
| 1 | Number of residences allowed on a single-family lot | A single-family lot can have one House, plus either one AADU or one DADU, but not both. | A single-family lot can have one house, plus an AADU and plus a DADU - 3 residences. |
|---|---|---|--|

**Concerns:** During the Seattle Planning Commission (SPC) comprehensive study between 2006 and 2009 of allowing Backyard Cottages on single family properties, the SPC believed that in order to preserve the character of the neighborhoods like every other city in the United States, they should limit the number of residences per lot. The SPC determined that if a house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft was reasonable considering all the other codes defining single-family properties, open space, setbacks, tree canopy preservation and lot coverage. In addition, the SPC believed that allowing a Mother-in-law (AADU) residence of similar size to be constructed within a home also preserved the character of the neighborhood. The SPC, along with every other city in the U.S. did believe strongly that allowing both to be built in addition to a home would forever change the character and convert these properties to multi-family use and negatively impact scale, and the character of the neighborhoods. The SPC also felt strongly that increasing the number of residences, people and families per site may have significant impacts upon utilities like water service, sewer and storm water drainage, and electrical, phone and broadband as well. Remember that when the City was platted 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or tripling the density on a single-family lot and neighborhood street.

I agree completely with the SPC's findings on these matters, and I ask that the alternative of "make no changes" be analyzed and adopted by the City. This proposed change would have far-reaching and drastic impacts on my neighborhood and other single family neighborhoods across the City, and would unduly burden infrastructure in most single family neighborhoods.

- |   |         |  |                                 |
|---|---------|--|---------------------------------|
| 2 | Parking | One off-street parking space required for an AADU or DADU unless the lot is in an urban village. | No off-street parking required. |
|---|---------|--|---------------------------------|

**Concerns:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge have wider streets, newer utilities and bigger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence. The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

*This proposed change should be carefully analyzed, as changing this requirement would alter forever the character of single family neighborhoods. While the City would like to imagine that Seattle citizens can give up their cars and ride transit or bicycles, this is wishful thinking that is not supported by facts. New residences need to provide for off-street parking. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |   |                        |   |  |
|---|------------------------|---|--|
| 3 | <b>Owner-occupancy</b> | <b>An owner must occupy either the main house or the AADU/DADU 6 months a year.</b> | <b>No requirement for an owner to occupy the house, the AADU, or the DADU.</b> |
|---|------------------------|---|--|

**Concerns:** *The Seattle Planning Commission together with other cities across the U.S. believed strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, the SPC required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment to their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year. In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family rental properties and either add them to their portfolios or sell them with little regard for their neighbors or neighborhoods. CM O'Brien wants to eliminate all ownership requirements and allow developers to accumulate and convert single family homes to multi-family properties allowing for three homes per property. During the QACC appeal, the City's own witnesses agreed that there would be speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.*

*This is the worst feature of the proposed legislation. It is completely unacceptable. I ask that the alternative of “make no changes” be analyzed and adopted by the City. This part of the legislation would completely destroy single-family neighborhoods in Seattle.*

- |   |                                    |                          |                          |
|---|------------------------------------|--------------------------|--------------------------|
| 4 | <b>Minimum lot size for a DADU</b> | <b>4,000 square feet</b> | <b>3,200 square feet</b> |
|---|------------------------------------|--------------------------|--------------------------|

**Concerns:** *Originally between 2006 and 2009 the Seattle Planning Commission determined through careful comparison studies concerning lot size around the U.S. in cities that allowed Backyard Cottages that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that has remained in the code. Now CM O'Brien wants to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon their own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000.*

*Even the City's own evidence does not support this change, which would have negative impacts on neighborhood all over Seattle. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

- |   |                        |  |  |
|---|------------------------|--|--|
| 5 | Maximum square footage | AADU 1,000 square feet, including garage and storage areas DADU 800 square feet including Garage and storage areas | <b>AADU 1,000 square feet, excluding garage and storage areas DADU 1,000 square feet, excluding garage and storage areas</b> |
|---|------------------------|--|--|

**Concerns:** Originally between 2006 and 2009 we on the Seattle Planning Commission determined through considerable research that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., the SPC felt strongly that Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air and trees, and preserving the qualities of single family neighborhoods with respect to privacy, etc. 300 Backyard Cottages have been built under this current code since 2010 and due to the expense and lot coverage restrictions, they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger homes, and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most cases opening up the size limits would severely impact others while on some lots of much greater size, perhaps some new accommodation might be able to be considered.

This proposed change would have negative impacts all over Seattle. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- |   |                |   |  |
|---|----------------|---|--|
| 6 | Maximum height | No change from existing height limits, which vary by lot width and range from 15-23 feet. | <b>Height limits are 1-3 feet higher than existing limits, depending on lot width.</b> |
|---|----------------|---|--|

**Concerns:** The SPC felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. I agree with the SPC, and I feel strongly that that any proposed increases directly correspond to lot sizes well above the minimums already set at 4,000 sq ft.

- |   |                    |  |
|---|--------------------|--|
| 7 | Lot coverage limit | 35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet. |
|---|--------------------|--|

**Concerns:** Again, I strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under CM O'Brien's proposal, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage could translate to much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

- |   |                          |                                  |
|---|--------------------------|----------------------------------|
| 8 | Rear yard coverage limit | 40 percent of a rear yard can be |
|---|--------------------------|----------------------------------|

covered by a DADU and other accessory structures (like a garage) This limit applies in addition to the overall lot coverage limit.

**60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.**

**Concerns:** *Again, I strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The 20% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

**9 Location of entries**

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

**DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).**

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would have the greatest impacts. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

**10 Roof features**

No exceptions from the height limit are allowed for roof features on accessory structures.

**Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.**

**Concerns:** *The exceptions CM O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom. I see significant opportunities for common abuse and believe it should remain limited as is. I ask that the alternative of “make no changes” be analyzed and adopted by the City.*

**11 Household size**

Any number of related people, or Up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

**Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.**

**Concerns:** *The current code allows 8 unrelated to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. The City has seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. CM O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within CM O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts and burdens. I ask that the alternative of "make no changes" be analyzed and adopted by the City.*

12 MHA requirements                      **Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.**

**Concerns:** *I do not have concerns about this.*

13 Rental Registration & Inspection Ordinance (RRIO)                      **Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.**

**Concerns:** *I do not have concerns about this.*

Please protect single-family neighborhoods from being converted to multi-family. If legislation like this passes, it will not be undone.

Thank you for considering my comments.

Sandra Perkins  
(address)

**ADUEIS**

---

**From:** Joe Giampietro <joeg@nkarch.com>  
**Sent:** Tuesday, October 31, 2017 3:55 PM  
**To:** ADUEIS  
**Cc:** Pennucci, Aly  
**Subject:** Comments on the EIS scoping for ADU-DADU regulations

Comments on the scope of the EIS:

- 1) Change to Height limits should better reflect the garage heights that are practical for Overhead Doors at the garage entry. Suggestion: please allow the height for 40 foot wide lots to be the same as those for over 50 feet wide. This will allow for a slightly taller and more usable garage level.
- 2) Ideally, the DADU lot should be allowed to be subdivided so that the occupant of the Backyard Cottage can also own and establish a basis of future-proofing the cost of housing; also allows for equity improvement over time.
- 3) All of the proposed changes are reasonable and I recommend approval of all, as specifically noted:
  - a) Allow both an ADU and a DADU on the same lot since the ADU will essentially be invisible to the neighborhood, and increased density will allow for diversity, affordability and transit improvement.
  - b) remove the parking requirement = lower cost & more units
  - c) owner occupancy should be removed as a requirement
  - d) Reduce the minimum lot size to 3200sf.
  - e) Allow 1000sf for each ADU and DADU not including garage or storage.
  - f) Increase the height limit to allow for reasonable and comfortable interior rooms at both the lower level garage and the upper level living area.
  - g) Agree with all the other proposed changes as well.

Thank you!

**Joe Giampietro**, AIA, Certified Passive House Consultant  
T: 206.933.1150 D: 206.494.9717 F: 206.933.1154  
[joeg@nkarch.com](mailto:joeg@nkarch.com) mobile number: 206.618.1545

**NICHOLSON KOVALCHICK ARCHITECTS**

Architecture | Landmark Resources | Development Consulting  
Pacific Northwest | Mid-Atlantic  
310 First Avenue S, Suite 4S, Seattle, WA 98104  
[www.nkarch.com](http://www.nkarch.com)

*Winner of the Green Builder Media Home of the Year Award for Stream Belmont in Seattle's Capitol Hill neighborhood, a project NK designed for Stream Real Estate LLC. It was constructed with a Net Zero carbon footprint and is on track for LEED H-Gold certification. View the project here: <http://www.nkarch.com/press/nk-receives-green-builder-home-of-the-year-award/>*

*Winner of the [AIA National Housing Award](#) for our Park Passive project.*

## ADUEIS

---

**From:** Georgi Krom <georgikrom@comcast.net>  
**Sent:** Tuesday, October 31, 2017 3:56 PM  
**To:** ADUEIS  
**Subject:** Please study impacts on additional housing

Attention City Council,

I am a Seattle homeowner concerned about plans to add new ADU/Backyard Cottage/DADU units to single family neighborhoods. I do not believe the city has studied the impacts of these proposals.

New housing units sprinkled throughout tight city neighborhoods will impact parking, traffic and change the character of our city. It is not a positive direction.

I suspect these will not be charming cottages but tall, bulky structures. There are already lots of new apartments being built now and they make sense near existing transit areas.

Keep Seattle neighborhoods distinctive. Do not allow new backyard buildings to max out small city lots without studying the damage it could do.

Sincerely,

Georgi Krom  
Queen Anne

**ADUEIS**

---

**From:** Jeanne Merritt <merritt113@hotmail.com>  
**Sent:** Tuesday, October 31, 2017 4:41 PM  
**To:** ADUEIS  
**Subject:** ADU Comment

To ADUEIS Group:

I favor increasing density, but doing so thoughtfully. Removing parking requirements results in clogged streets that are unsightly, plus unsafe for children, pets and seniors. It creates a hardship for seniors who might want driving friends to come over-- If the friends can only walk limited distances and parking is not readily available they will no longer visit.

Removing the owner occupancy requirement sets us up for slum landlords who buy a cheap house and construct a second cheaper house on the property without regard to existing neighbors.

I am a senior who lives in West Seattle not far from the "Urban Village". I watched the developers get a windfall by not providing parking for tenants. But tenants still have cars, and those cars are all over the neighborhood. An increase in density should not mean a decrease in the quality of life here.

So ADUs, yes, but please maintain offstreet parking requirements and owner occupancy requirements.

Thank you.

Jeanne Merritt  
Powered by Cricket Wireless.

**ADUEIS**

---

**From:** Barbara Warren <bpw.wa04@comcast.net>  
**Sent:** Tuesday, October 31, 2017 7:46 PM  
**To:** ADUEIS  
**Subject:** Comments re Scoping for ADU EIS

To: Aly Pennucci, [ADUIS@seattle.gov](mailto:ADUIS@seattle.gov)  
Re: Scoping Comments for ADU/DADU  
From: Barbara Warren, [bpw.wa04@comcast.net](mailto:bpw.wa04@comcast.net)  
Date: October 31, 2017

The EIS study areas are broadly defined. Below are my suggestions for priority areas to study in order that the program will actually achieve the goal of providing more affordable housing without unintended countervailing adverse impacts:

1. Whether the proposed dimensions and lot coverage changes would exacerbate Seattle's storm water run-off problem, and/or sewage treatment capacity due to tree canopy loss and increased impervious surface. This should be studied for various watersheds, as the results may vary locally. The sewage treatment capacity is already being challenged by the climate change induced changes in rainfall patterns as was dramatically demonstrated by this year's total shut down of the West Point Treatment Plant.
2. Whether parking requirements alternatives should be developed in neighborhoods that already have parking problems.
3. Whether removal of the owner-occupancy requirement will actually produce affordable housing?

My biggest concern is removing the owner occupancy requirement, as that opens the door to absentee landlords who are not as likely to be concerned with building quality, maintenance or aesthetics, rather than profits. My own experience as a legal services attorney representing low-income tenants was that they often were at the mercy of their landlords. Do the economics of these transactions only work if very high rents are charged, or too many students are packed in? While, it may produce more units, would it further exacerbate the already overpriced market for families looking to buy a single family home in Seattle, without the benefit of adding truly affordable units?

My proposed alternative solution to this would be to study an exception for the ownership requirement limited to non-profit housing organizations whose mission is to provide affordable housing, and for limited equity land trusts. The economics of the rents to be charged without this provision should also be studied. This alternative would assure that the units that were being produced would increase the stock of ground related affordable housing in all neighborhoods, including housing for some larger families, or families that preferred to live in larger extended family units, where children would have a place to play.

Another policy alternative would be to create a program to offer low-interest loans, or loans repayable at transfer, for low-income homeowners to build an ADU, or DADU to help avoid displacement due to rising

property taxes, accommodate extended family, or add an accessible unit for seniors, who want to have their family members take over responsibility for the main house.

## ADUEIS

---

**From:** GWEN J BOYER <boyergj@msn.com>  
**Sent:** Tuesday, October 31, 2017 8:18 PM  
**To:** ADUEIS  
**Subject:** ADU Comments

- 1). Does this include single family home basement rental units?
  - 2) implementing a tax reduction for those home owners converting unfinished basements to a space suitable for renting would be helpful in off-setting the cost of remodeling.
- Contractor remodel Estimates for basements range from \$75,000-\$200,000.

Sincerely,  
Gwen Boyer

Sent from my iPhone

**ADUEIS**

---

**From:** NANCY WEITKAMP <nancyweitkamp@msn.com>  
**Sent:** Wednesday, November 01, 2017 6:29 AM  
**To:** ADUEIS  
**Subject:** Comments re Scope of EIS ADU/DADU legislation

To whom it may concern:

The neighborhood that I live in (Cedar Park) has one road that serves all houses from NE 123rd to NE145th. All people who live in this area must use 42nd Ave NE to reach their homes. That includes everyone living just off 42nd Ave NE as well as on the waterfront. I haven't done a count of the population served but it must be well over a 1000 households.

Already, with ADUs added to our neighborhood, people are parking on the one street that carries all the traffic. It is a narrow street to begin with and when people park along the street, traffic is forced to wait when there is oncoming traffic. I can't imagine what we would do if all the lots were rezoned to triplex AND with no parking requirement. How can that possibly not be impactful?

Changing all areas to triply dense zoning, without regard to the specifics of each area, is a recipe for disaster. You can't assume that all people will relinquish their cars just because there will be no parking provided. Using a bicycle in this climate, and with the inherent dangers of traffic, is unlikely for those of us who are older and that pretty much covers most of my neighborhood.

Aside from the impracticality of upzoning every single family lot, the quality of life will be diminished. Our neighborhood is called Cedar Park because of all the old growth trees. What happened to protecting that part of our beautiful city?

We live next door to Lake City which has absorbed an unbelievable amount of growth in the past two decades. It makes more sense to add growth near transportation hubs and ours is not one of them. We are so far from light rail and the freeway that adding density in our neighborhood would just add to the already horrendous traffic situation, not to mention the air pollution.

Isn't it obvious that all these changes proposed by the EIS ADU/DADU legislation are going to impact every neighborhood in major ways and that the people who live in these neighborhoods should have some input into their own futures? My understanding is that the city council is elected to represent us, not control us. It seems that people who have lived in Seattle more than five years are considered expendable. Perhaps we don't make big bucks and aren't of the millennial generation but are interests should matter, too.

Nancy Weitkamp  
12711 42nd Ave NE  
Seattle, WA

**ADUEIS**

---

**From:** Susan George <seattlesue@msn.com>  
**Sent:** Wednesday, November 01, 2017 9:56 AM  
**To:** ADUEIS  
**Subject:** I would like to start the conversation in my neighborhood

Broadview could be the perfect neighborhood for backyard cottages/ADUs on a bigger scale.

The average size lot is 8,000 to 12,000sq ft. Most homes have 3/more parking spaces because this neighborhood has driveways . (We don't have sidewalks but we have plenty of room for extra cars.

Unfortunately our neighborhood has never had anybody from the City to come out and talk about backyard cottages and ADUs. I have brought this up to O'Brian, who is the big supporter. It didn't surprise me that QA CC force the issue of environmental impact on neighborhoods. This idea was launched in neighborhoods that are already dealing w/ congestion. Seattle has many neighborhoods with great commuter buses. Not everything has to be Wallingford, Queenanne and Ballard.

You need to think bigger, out of the box.. I have a lot of great ideas to make this successful in our neighborhood, Broadview. Showing success will encourage other neighborhoods to get behind this too! If you're interested, let's talk. I am the owner of [BroadviewSeattle.org](http://BroadviewSeattle.org), a neighborhood website that has been successful for eight years without advertising.

warm regards,  
Susan George

Sent from my iPad. Sorry for any spelling errors and/or brevity!

Susan George

[www.seattlesue.com](http://www.seattlesue.com)

## ADUEIS

---

**From:** Barbara Kiley <barbara.kiley@outlook.com>  
**Sent:** Wednesday, November 01, 2017 10:14 AM  
**To:** ADUEIS  
**Subject:** Before increasing the density in Seattle, repair and increase capacity in City Sewer Treatment and roadways--not after!!! Thank you, Barbara Kiley- a Magnolia grandmother

**ADUEIS**

---

**From:** mishaw09@aol.com  
**Sent:** Wednesday, November 01, 2017 11:10 AM  
**To:** ADUEIS  
**Subject:** Yes to Backyard Cottages - ONLY IF AFFORDABLY PRICED

Hello

I am the owner of a Co-op apt and an older woman. I have had some difficulty getting hired to a reliable job as I have gotten closer to retirement age. My Property taxes have gone up nearly 50% since 2013 (48.5%) My homeowners insurance has gone up 30%. My neighborhood has LESS PARKING for residents - SDOT took away RPZ areas in favor of metered parking - while ours is one of the highest growth neighborhoods due to DOLU Forcing higher buildings & massive density increase into our neighborhood against the preferences of the people who have lived here for decades. THERE ARE NO AFFORDABLE APTS BEING BUILT for Single adults or older adults in our neighborhood, only "luxury" units aimed at Amazonites.

I WANT Nearby Areas TO ALLOW Backyard Cottages - But ONLY IF SOME are DESIGNATED LOW INCOME singles, Lowincome ELDERS & Lowincome VETERANS. Otherwise its just more scrooges profiteering and forcing people like me out of the city. I have lived in the core of Seattle for 30 years and was driven out of my neighborhood of 26 years - Capitol Hill - by absurdly skyrocketing rents.

I have worked most of my career in DT & 1st Hill HOSPITALS - meaning when it snows I can WALK to WORK this keeps hospitals open & functioning. GET A CLUE YOU NEED TO KEEP US IN THIS CITY. ACTING IN 5 years or 10 years is of no use to anyone but those already wealthy enough to not find themselves in this position.

Also - "Safe" Injection Sites are not supported by actual valid reproducible scientific/epidemiological data. It might save a couple of lives from having narcan close at hand but it Does NOT clean the neighborhood of used needles nor prevent use - SPEND THAT MONEY ON TREATMENT FACILITIES & TREATMENT BEDS! Treatment works. NO TAX FUNDED INJECTION SITES IN SEATTLE!

Sincerely

Misha W

" Never make someone a priority in your life as long as you remain an option in theirs."

## ADUEIS

---

**From:** Jean Amick <jeangamick@gmail.com>  
**Sent:** Wednesday, November 01, 2017 2:18 PM  
**To:** ADUEIS  
**Subject:** Please

Make law say original, larger dwelling must be owner occupied - always, not just 3-5 years. If to provide local housing inventory then should not be rentable to air BnB etc.

~ Jean  
206-601-6123

**ADUEIS**

---

**From:** HARRY SELLERS <HESELLERS@msn.com>  
**Sent:** Wednesday, November 01, 2017 2:37 PM  
**To:** ADUEIS; Kaplan, Martin  
**Subject:** Scoping Comments re EIS for Accessory Dwelling Units EIS

To Whom It May Concern:

The original issuance of a DNS for major legislation impacting city development was extraordinary. An EIS is a necessary addition for changes of this magnitude. The scoping for the EIS should, at a minimum, address the three items listed below:

1. Schools. The city appears to be rushing forward with increased density with little regard to schools. The local elementary school, West Woodland, is over capacity even though a new school, Cascade Elementary, can absorb some capacity. The principal indicates that the crowding will worsen even without proposed city changes.
2. Traffic. Traffic routinely backs up from Phinney all the way to 3rd NW. Many drivers now use the residential streets to get around this problem. What will happen to traffic with the increased density the city proposes?
3. No Ownership Requirements. Allowing 3 DU's with no owner occupancy is a recipe for rampant speculation, worsening traffic and parking, and more crowding in the schools.

Here locally there are at least 3 building(s) which are scheduled to be torn down and newer, and probably larger, buildings as replacements. Quite simply, why are these radical changes necessary when there is already a reasonable accommodation for growth and renewal?

Sincerely,

Harry Sellers  
221 NW 62nd St  
Seattle, WA 98107

## ADUEIS

---

**From:** Doug Trumm <doug@theurbanist.org>  
**Sent:** Wednesday, November 01, 2017 2:57 PM  
**To:** ADUEIS  
**Subject:** Go Big on ADU study

To whom it may concern,

The City of Seattle should leverage the Accessory Dwelling Unit (ADU) environmental impact statement (EIS) to begin planning for broader changes outside Seattle's urban villages. As long as we are taking the better part of a year to study parking and tree canopy, we should craft the EIS study to be broadly applicable. Doing so may speed up the rezone process and allows to replace swaths of detached single-family zoning with a more flexible zoning that allows missing middle housing types, such as duplexes, triplexes, rowhouses and courtyard apartments.

I support the effort by More Options for Accessory Residences (MOAR) to make it easier to build ADUs. The group's [policy suggestions](#) include:

- Green building incentives;
- Reduce permitting fees for ADUs;
- Apply a FAR limit to single-family zones to curb the trend of teardowns for mansions;
- Make ADUs easier to build;
- Split ownership of the lot i.e. via fee simple subdivision;
- Reduce (or eliminate) off-street parking requirements;
- "Upgrade non-conforming housing types and uses, such as duplexes, established before 1995."
- Convert single family zoning to Residential Small Lot in "a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit..."

The City of Seattle should make sure their EIS makes it possible to carry out reforms like the above. And we should move quickly given the severity of our affordability crisis.

### Future MHA rezones in Single-Family Zones

MOAR proposes excluding the overlay Residential Small Lot (RSL) from the Mandatory Housing Program (MHA) program. It'd certainly be better than the alternative: detached single family also with no MHA requirement.

In the long-term, RSL likely won't be a generous enough zoning type to be the workhorse zoning in our existing single-family zones. Lowrise 1 (LR1) and Lowrise 2 (LR2) would be a better fit and allow a fuller range of the [Missing Middle](#) housing typologies. It'd also allow a clearer increase in capacity, providing a clear opening to apply the Mandatory Housing Affordability program to the large patches of the city that are being let off the hook in our current plan. Whether as part of this legislation or not, I urge to the Seattle City Council:

- Upgrade high-opportunity, low displacement risk single-family zones to LR1 or LR2;
- Use MHA to capture increasing land value and fund affordable housing development.

### Apply the Racial Equity Toolkit

Equity would seem to dictate that everybody should contribute to solving our affordability crisis. Somebody who builds a 6,000 square foot mansion should pay into the City's affordable housing trust fund just as surely as someone who builds apartments. We need to apply our land value capture strategy citywide. As Sightline's recent [home price map](#) demonstrated, many neighborhoods are seeing million dollar homes increasingly dominate their housing stock. There's no good reason that the builder or owner of a million dollar home can't pay MHA fees.

Tons of land value is being accrued across Seattle as our city booms. If we do not seek to capture this value and harness it for building affordable housing, we won't be doing our due diligence, and we won't be carrying out the Housing Affordability and Livability Agenda to its fullest.

The ADU EIS can give us information to make the case for changing single family zoning, especially in the wealthiest and most exclusionary parts of Seattle. Parking studies are going to required down the road as we try to convert some areas of single family to RSL, LR1, or LR2. Rather than let obstructionists delay us, let's broaden the scope of the EIS and use it to build a more affordable future.

I also published these comments here:

<https://www.theurbanist.org/2017/11/01/submit-adu-comment-new-november-16-deadline/>

Thank you for your consideration.

Sincerely,

**Douglas Trumm**, *Publication Director*

[The Urbanist](#) | 320.237.4771



**ADUEIS**

---

**From:** Marlow Harris <MARLOWHARRIS@msn.com>  
**Sent:** Wednesday, November 01, 2017 4:07 PM  
**To:** ADUEIS  
**Subject:** I support allowing more ADU's and DADU's in Seattle

I am a real estate professional in the City of Seattle. Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

- 1.
2. **Waive building permit fees for 5 years** for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
3. **Use Green Building incentives** similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
4. **Housing Opportunity Overlay.** Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
5. **Upgrading non-conforming housing types and uses, such as duplexes, established before 1995.** There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

6. **Buffering detached houses from higher zones:** If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
7. **Make accessory dwelling units easier to built.** Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
8. **Study using Floor Area Ratio to restrict size of development and incentivize additional housing units.** Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
9. **Double Ownership.** Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
10. **Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings.** One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing,

and having an additional source would help many owners create their own.

Marlow Harris

Residential and Investment Consultant

Windermere Real Estate 1112 19th Ave. E., Seattle WA 98112

Website: <http://www.SeattleDreamHomes.com>

Connect on Facebook: <https://www.facebook.com/SeattleDreamHomes>

Twitter: <http://twitter.com/marlowharris>

Office: 206-329-3795 Cell: 206-226-7014 Fax: 206-328-1716

**ADUEIS**

---

**From:** Alexandra Immel <alexandra@alexandrainmelledesign.com>  
**Sent:** Wednesday, November 01, 2017 6:28 PM  
**To:** ADUEIS  
**Subject:** D/ADU comments

Comments on the ADU issues being considered:

I am in favor of the increased density that additional ADUs and DADUs will bring to our neighborhoods and of the ability to have 2 accessory dwelling units on an appropriately sized single family lot. Additional units will bring more taxes and more services to our neighborhoods.

We need to address the parking by increasing our public transportation.

As a building designer who has designed multiple ADUs and DADUs I want to give you the benefit of my experience. My clients are mostly interested in offsetting the rising costs of property taxes and to increase their income and leverage the most from their property and the ones making a substantial investment to create a DADU (usually upwards of \$200K) are not considering creating affordable housing, they are considering renting out on AirBNB at \$100/night or allowing their adult children to live there, or an elderly parent.

In contrast, basement apartments are often lower quality spaces and lend themselves more to affordable housing. Our clients are spending about \$120K to create a basement apartment and are more willing to rent this to a steady tenant who is predictable and less likely to pay top dollar.

My clients are always interested in the bottom line and if you give incentives to create what you want to encourage, they are likely to overcome other obstacles. I suggest that in the cases where you allow creation of the "Block" project house for homeless citizens, you also allow them to create a second ADU for their own rental. I worry enormously that my own adult children will not be able to afford to stay in the City because of housing costs, so continuing to allow the creation of more units in my opinion is a good idea. But we have to address public transportation at the same time or the saturation will make this an unlivable City and all this growth will backfire for the next generation.

Alexandra Immel  
Alexandra Immel Residential Design LLC

## ADUEIS

---

**From:** Welch, Nicolas  
**Sent:** Thursday, November 02, 2017 11:24 AM  
**To:** ADUEIS  
**Subject:** FW: Regarding Seattle EIS Scoping for Accessory Dwelling Units (ADU, AADU and DADU) within Single-Family Residential Zones

---

**From:** J Katzenberger [mailto:bscg\_katzenberger@outlook.com]  
**Sent:** Thursday, November 02, 2017 10:56 AM  
**To:** Welch, Nicolas <Nicolas.Welch@seattle.gov>; Pennucci, Aly <Aly.Pennucci@seattle.gov>; Kelly, Jason <Jason.Kelly@seattle.gov>; Goldberg, DavidW <DavidW.Goldberg@seattle.gov>  
**Subject:** Regarding Seattle EIS Scoping for Accessory Dwelling Units (ADU, AADU and DADU) within Single-Family Residential Zones

---

The proposed alternatives to Land Use Code present some unintended, but easily foreseeable, adverse consequences for livability and affordability in single-family residential zones. Please consider the following:

### EIS Consideration

- A single family lot should be allowed an AADU or a DADU, *but not both*
- Owner occupancy in at least one of the units must be enforced
- Mandatory Housing Affordability requirements must apply to AADUs and DADUs

### Why:

- Developer speculation is already driving up housing prices in Seattle. Without an owner-occupancy rule, there is strong incentive for developers to scrape a lot, removing the existing home and trees, in order to build more expensive houses maximizing ADU / AADU / DADU density loopholes

### **EIS Consideration**

- No more than 40% of a rear yard may be covered by an DADU

### **Why:**

- The 60% proposed coverage can result in drainage issues for neighbors, and also the larger community, as the cumulative impact of multiple DADUs removes open space – See the City *Rainwise* program for reference

### **EIS Consideration**

- Owner/builder must ensure sufficient *emergency access* to all units
- Owner/builder must designate and provide sufficient space for waste management storage and pickup

### **Why:**

- An unintended consequence of removing parking requirements is that, in many cases, it removes driveway access to units. Time is critical during strokes and heart attacks, how long will it take to get a gurney from the street to that DADU? And newer ambulances are wider than before
- Neighborhoods where density has increased to 3+ units per lot are experiencing loss of mobility on sidewalks and streets on waste/compost/recycling pickup days because developers failed to create waste management pickup areas. Some sidewalks are impassible to ADA / elderly due to the number of receptacles

### **EIS Consideration**

- Height limits for DADUs may not exceed existing height limits

**Why:**

- Neighbor privacy and CHILDREN NEED SUNSHINE

**EIS Consideration**

- ***Mandatory*** open space compensation, such as parks or P-Patches, where DADUs are allowed

**Why:**

- AADUs / DADUs lead to loss of drainage area
- AADUs / DADUs lead to loss of recreation area
- AADUs / DADUs lead to loss of wildlife / pollinator habitat

**EIS Consideration**

- ***Mandatory*** neighborhood evaluation *at least every two years* to document and assess community impacts. To include, but not limited to:
  - Home valuations
  - Drainage capacity, flooding, erosion
  - Transportation capacity
  - Bike / pedestrian collisions
  - Tree canopy loss or gain

**Why:**

- SDCI and OPCD currently have no mechanism for tracking the cumulative impacts of density (!!!) By the time an issue is identified, it becomes costly to fix, if it can be fixed at all

- The City of Seattle failed to learn from what happened in Vancouver where speculators and international interests drove home prices to untenable levels before the problem was identified and a foreign investment tax was assessed

### EIS Consideration

- Parking requirement may be waived only if proposed AADU / DADU is within a ¼ mile of reliable transit

-

### Why:

- A car-less society is a nice idea, but families still need to transport children, the elderly, the disabled and infirm. They still need to pick up groceries. They still need to park their car within a reasonable distance from their home. Don't penalize families for their transportation needs. Not everyone has the disposable income to use Uber to pick kids up from school or Amazon Fresh to get diapers for the kids or Depends for the parents
- I voted five times for a monorail that *passed four times*, but it never materialized. "Future" or proposed transportation options are speculative and should not be used as a basis for increased density

Finally, I don't live in a single-family zoned area, nor am I planning to move to one. I don't see SF people as rich NIMBYs trying to be exclusive, I see them mostly as long-time residents who voted over and over to tax themselves for better schools, parks, libraries, and emergency response. They worked hard to provide a good home for themselves and their children and are now seeing their quality of life diminished because mostly well intentioned urbanists (backed by less well intentioned real estate speculators) see density, and *density alone* as the panacea to housing affordability.

Most welcome new neighbors and the improved infrastructure growth brings (or is supposed to). They are being vilified and shouted down by a one dimensional, specious argument that density automatically leads to affordability. Please listen when they ask for common sense regulation regarding open space, tree canopy, wildlife habitat and mobility infrastructure. Open a dialog.

The "build, baby, build!" mentality has led to displacement of affordable housing in favor of maximizing developer profits. I have faith that our City planners know better and, having reviewed multiple case studies, understand the value of housing diversity, including existing single family zones, in creating sustainable, affordable communities where children can thrive.

Instead of “build, baby, build!” lets try, “What do babies and their parents need?”

Best regards,  
J. Katzenberger

## ADUEIS

---

**From:** Jean Durning <jeandurning@outlook.com>  
**Sent:** Thursday, November 02, 2017 1:15 PM  
**To:** ADUEIS  
**Subject:** More places for folk to live, please

Please free up people's imaginations to build all kinds of apartments and small houses on their lots. The city could Approve some basic small house designs to speed up issuing permits, but also let people be creative. No more McMansions for small families--turn them into duplexes or triplexes. Let the city consider shared ownership-- maybe the owner keeps owning the underlying land but could sell the small house to someone living in it. Allow as many options as possible, so we can get families with children back into neighborhoods again

Jean Durning, Seattle resident since 1959  
206/922-2668  
900 University St , Apt 2-W, Seattle 98101

Sent from my iPad

**ADUEIS**

---

**From:** Patricia Fels <patriciatusafels@gmail.com>  
**Sent:** Thursday, November 02, 2017 2:50 PM  
**To:** ADUEIS  
**Subject:** Re: cottages and EIS

It seems that my comments were not included in your list. When I checked out the comment page, only saw: "please see attached letter".

So, here is the letter:

To: City of Seattle

Date: October 18, 2017

Re: Backyard Cottages & EIS

I am an architect who has designed and guided through the City permit process at least a dozen cottages. I am a big believer in the accessory dwelling unit. Density could be doubled in a neighborhood without a single big multi-complex being built. With the addition of cottages, the scale of the neighborhood is maintained and the city gains households. Historic buildings and landscapes are preserved. Local people building a cottage mean local people control their city, not developers from far and wide. Also, I find that cottage rents are more affordable than those of most of the new large apartment complexes. This is obviously because homeowners don't have the massive costs of acquisition and infrastructure installation that developers face. Homeowners can fit a cottage onto their property and usually hook up to existing water, sewer and power.

So, why is the City so afraid of the cottage?? Or, why is DCI so stingy. DCI treats 800 SF structures as if they were major construction. They tend to nit-pick. They say they are "protecting" citizens, but what they are doing is making housing un-affordable. Some examples:

**Parking** – a client who lived in North Seattle where there is ample space for parking on the street, ran into the 2-space parking problem. She had a driveway with plenty of room for two cars, but the city insisted that no car be parked in the first 20' (setback). Of course, every house in the neighborhood has cars parked in driveways in the first 20'. But the city wanted her to extend that driveway deep into her lot, so the cars would be setback 20'. This lot is beautifully landscaped with good tree coverage; the lot also had a large street

setback (no curbs) that provided setback from the road. Instead of responding to the particular geography (easily visible from google map), DCI demanded the driveway be extended.

**Height** – I personally believe that the height limits are good. But I also believe that no owner should have to provide a survey to prove the height calculations. They are costly, time consuming and most homeowners don't even know how to get one. Another client had a slightly sloped lot; we averaged the height and kept walls at the height allowed. DCI sent the plans back and wanted elaborate calculations of each elevation to prove the height. I was able to provide the calcs, but my time doing this added of course to the cost of the project, which is supposed to be affordable.

**Area** – The present limitations work excellently for owners of 5000 SF lots. But the City should definitely consider a small percentage increase for larger lots and/or properties with a garage/cottage combination. Throughout Seattle (Capital Hill, North Seattle, Columbia City, ...) there are alleys with garages facing these alleys. Many owners would love to convert them into rentals. Garage with a cottage above is a great opportunity to expand housing in Seattle. Here's an example:

cottage project was on a SF7200 zoned lot. An existing garage (on an alley) was going to be expanded with a 2<sup>nd</sup> floor cottage. The garage was to continue as the homeowner garage. DCI would not allow the garage square footage to be considered separately. 800 SF was to be the total amount and there was no 'believing' that the garage was for the homeowners, cottage for renters. This type of inflexibility is harmful to everyone. A more rational approach would be an allowance for an existing 'homeowner' garage (say 200-250 SF) in DADUs where the zoning is SF7200 or greater.

DCI requires the full range of documentation for these small structures. Besides the construction drawings there are energy and structural calculations, forms, forms and more forms, including covenants that must be recorded with King County. For sure, this makes work for staff and architects, but does NOT help affordability of rentals. Owners must pay for much more elaborate permit drawings than should be required for a 600 SF – 800 SF structure. DCI even requires that a structure with living space of 500 SF have an air infiltration test to meet the energy code. As an architect well versed in energy conservation I can tell you that these small homes are immensely energy efficient – common sense wise. They have natural ventilation, natural light and a small footprint to heat. To require an air infiltration test is madness.

None of the DADUs or ADUs qualifies for "Subject to Field Inspection" (STFI), which would vastly reduce the amount of paperwork. DCI requires that each unit go through the full permit process. Even when an owner wants to place an ADU inside their home with no structural work they do not qualify for "Subject to Field". This, once again, is counterproductive. Inspectors in the field are perfectly capable of insuring code compliance.

We as a country used to allow the building of small houses without a staff of experts. Builders and owners built the majority of the now-treasured bungalows of Wallingford. Their affordability resulted from a lack of many of the upfront costs that the City now levies on homeowners trying to build a backyard cottage.

I have been a longtime advocate for cottages, back to the original legislation and the first “trial” cottages. As I see Seattle swamped with huge, impersonal apartment complexes, I feel even more strongly the need for cottages. They provide a positive response to many of the issues we are now dealing with: affordability, density, neighborhood scale, tree/vegetation preservation, and local control.

Patricia Tusa Fels

PTF Architects

206-353-4174

On Oct 24, 2017, at 8:49 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Patricia,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)

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

From: Patricia Fels [<mailto:patriciatusafels@gmail.com>]

Sent: Thursday, October 19, 2017 7:50 PM

To: ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>

Subject: cottages and EIS

Please see the attached letter concerning cottages.

## ADUEIS

---

**From:** Nancy Ritzenthaler <nancyrwhidbey@hotmail.com>  
**Sent:** Thursday, November 02, 2017 4:06 PM  
**To:** ADUEIS  
**Subject:** Input to ADU, DADU EIS

Dear Sirs

Thank you for your work on the updated Backyard Cottages rules. In general, I believe that the new proposed rules are well thought out and fair. Significant public input has been incorporated into the decision, and they do align with HALA goals. I understand that there are factions in the community who want to see no changes to single family zoning, and to keep the existing DADU rules. I've read through the concerns of the Queen Anne group, headed by a Queen Anne architect (whose firm builds very large single family homes in Seattle and Sun Valley). I believe that the 60% of the land zoned single family SHOULD be part of the conversation, and should contribute to adding diversity of housing and our vibrant city life. Seattle's single family zoned neighborhoods should not be walled off zones where the 1% live. They should accommodate a variety of income levels and diversity. Single family houses in Seattle are so expensive now that only high income people can afford to buy, or afford the taxes to stay. The backyard cottages regulations allow a broader range of people to enjoy our beautiful city, perhaps with a garden that they can tend. It encourages the development of smaller houses on lots, which is what Seattle needs to address our housing crisis.

Specific comments regarding the regulations:

1. Owner occupied restriction. Example: Our 11040 sq ft rental property in West Seattle includes a 1963 garage that we would like to convert into a backyard cottage, in addition to the vintage 1963 1400 sq ft rambler that we rent out long term. While it makes sense to eliminate the owner occupied requirement as proposed, it makes little sense to have a 12 month vacate period before a DADU can be rented out. In our case, the main house has been rented out for the past 15 years. The vacant garage could instead provide additional rental housing stock. After we complete the project with a DADU ready for renters, why does it then need to sit vacant for 12 months? If non owner-occupied is to be allowed, I respectfully submit that we do this right away without this token but ultimately useless nod to the anti-development faction. This will not stop small developers from seeing this opportunity. In fact, Seattle needs this kind of additional family oriented rental housing stock right away, and should be encouraging people to build DADUs. Adding a 12 month waiting period provides zero benefit to anyone. As per the stated goals Policy LU64: *"In order to create attractive and affordable rental opportunities and provide greater flexibility for homeowners, permit accessory dwelling units in single-family zones, subject to regulations design to limit impacts and protect neighborhood character."* Furthermore, the proposed Seattle 2035 Comprehensive Plan Update current under consideration by the City Council includes the following policies:
  - Policy H 3.4 directing the City to *"Promote use of customizable modular designs and other flexible housing concepts to allow for households' changing needs, including in areas zoned for single-family use."*
  - Policy LU 7.5 directing the City *"Encourage accessory dwelling units and other housing types that are attractive and affordable to a broad range of households and incomes and that are compatible with the development pattern and building scale in single-family areas."*
2. This is a request for clarification. The proposed regulation change allows garage space and storage space plus up to 1000 feet of living space. Could this be garage space for 2 cars and an undefined amount of storage space, with the upper limit mainly dependent upon lot coverage rules?

3. Many Seattle lots are 50 foot lots. Please apply the new 16” height limits at “50’ width and above”, not at “greater than 50’”. Otherwise, those with 50’ lots miss out on building to a reasonable 16’ height. Or provide a more sliding scale without such large breaks between 14’ and 16’ in height.
4. I note that there are Zero proposed restrictions or regulations covering on using the new backyard cottages for either short-term rental/Airbnbs. As a policy matter, I sincerely believe that if no restrictions are placed on use of backyard cottages, that most cottages will end up on the short term rental market, rather than providing badly needed long term housing for Seattle residents.

My most important feedback is this. If the City’s policy goal is to provide more housing for residents, then do everything possible to make it easier to rent the new backyard cottages to residents. Eliminate any restriction on owner occupancy, even in the first 12 months. Let them be built and then start renting them out long term right away. However, to encourage keeping them in the long-term rental pool, place a covenant on these properties that disallow STR use, for at least the first five years.

Thank you for your time and effort to address these important housing issues in Seattle.

Nancy Ritzenthaler  
1401 Sunset Av SW  
Seattle WA 98116

**ADUEIS**

---

**From:** Ronald Chase <rdchase1@yahoo.com>  
**Sent:** Thursday, November 02, 2017 4:18 PM  
**To:** ADUEIS  
**Subject:** Comments on Scoping the EIS

1. Any assessment of the environmental impact of this proposed rezoning should take into account the likelihood that some portion, perhaps a significant portion, of any housing units added would be used for short term rentals to non-city residents (Airbnb, for example). Given the provision that would create absentee landlords, this means that a single lot in a crowded neighborhood could be used by three entirely different renters and be occupied by in excess of the already excessive provision to allow 12 unrelated people per lot (who would enforce the limit when a large group of unrelated people rent a house for a short stay from an absentee landlord? Vacationers or conference attendees' parties in hotels are commonplace. What happens when unruly short term renters decide to party in family neighborhoods? Several recent newspaper articles describing such problems in New Orleans show that this is not a far-fetched notion. Conflicts with neighbors would be inevitable.)
2. Climate change forecasts show Seattle getting wetter and warmer. It is not enough for an EIS to evaluate rainfall and runoff based on historical records. The best available forecasts for future decades for the impact on a city with fewer trees and with more impermeable surfaces, which would result should this proposed zoning change occur, should be taken into account.
3. Councilmember O'Brien's proposal to change the zoning in every single family zoned neighborhood in Seattle is a triumph of ideology over sanity, as is the apparent decision to limit the EIS options to No Change citywide or dramatic change citywide. In many close in neighborhoods this proposed change seems more a attempt to stick a city councilmember's finger in the eye of family neighborhoods rather than a carefully considered action, but it is possible that in neighborhoods more distant from the city center, with larger lots and less density, some change might be justified. We will never know if the only options are No Change or what is essentially an attempt by ideologues to eliminate single family housing in Seattle.

Ron Chase

**ADUEIS**

---

**From:** Jean Rempfer <rempfer\_332@yahoo.com>  
**Sent:** Thursday, November 02, 2017 5:01 PM  
**To:** ADUEIS  
**Subject:** RE: ADU

Hello Aly Pennucci and Nick Welch,

Ours is a long, narrow house with one ADU already. If the south part could be a second ADU, with us living in the middle part, this also would help both us and the two families who would live on either side of us.

There are three kitchens, three full baths, and four bedrooms in this house now, with a kitchen, bedroom, and bath on either side of us. It's like this now, with a fenced yard for each section. If triplexes were allowed this would offer three families the comfort of a house and yard without the high cost of renting a free-standing house.

Thank you for reading my ideas, I think they are a win-win solution

Take care,

Jean

[Sent from Yahoo Mail on Android](#)

On Wed, Nov 1, 2017 at 5:28 PM, ADUEIS  
<ADUEIS@seattle.gov> wrote:

Jean,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process. **Note that we extended the comment period 15 days to November 16.**

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Jean Rempfer [mailto:rempfer\_332@yahoo.com]  
**Sent:** Wednesday, November 01, 2017 1:30 AM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** ADU

Hello,

I rent out an ADU attached to my home in order to help pay the property taxes, so that my 82 year old husband, my daughter who has Autism, and I myself can hang on to the home. I am 72. Since my husband has no right hand, he got into self-employed lawnmowing years ago in order to help support the family. He still work and I help him when I can.

But we are going to someday be too old to work, and I would very much like to be allowed to rent out both sides of this ADU, instead of our being forced to live in one side. We could then live at my brother's place, and we would have enough money, if we can even work at all, to set aside for special needs our daughter may have when we are gone. Right now we are barely breaking even.

Both sides of the home would be rented out, then, and the families in them would have good housing and fenced yards for children and pets. This would be cheaper than each family paying for its own separate house, and a good place for kids.

I hope that the requirement that owners live on-site can be waived.

Thank you so much,

Jean Jones

[Sent from Yahoo Mail on Android](#)

## ADUEIS

---

**From:** aileen langhans <aileenmargaret@yahoo.com>  
**Sent:** Friday, November 03, 2017 12:03 PM  
**To:** ADUEIS; Welch, Nicolas; Aileen Langhans  
**Subject:** Re: RE: Comment Letter from the Langhans family

Please respond to the email below.

Thanks,

Aileen

On Wednesday, November 1, 2017, 9:26:49 AM PDT, aileen langhans <aileenmargaret@yahoo.com> wrote:

Dear ADUEIS,

The letter submitted on the 31st is an update of the previous one sent on the 30th, before my sisters were able to proofread its contents. Please delete that one, as they are almost redundant. The updated version is more accurate and more grammatically correct.

Please contact me that you received this message and have removed the original letter.

Thank you,

Aileen

On Wednesday, November 1, 2017, 8:17:46 AM PDT, ADUEIS <ADUEIS@seattle.gov> wrote:

Aileen,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process (**the comment period has been extended 15 days to November 16**).

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** aileen langhans [mailto:aileenmargaret@yahoo.com]  
**Sent:** Tuesday, October 31, 2017 9:35 AM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Cc:** Aileen Langhans <aileenmargaret@yahoo.com>  
**Subject:** Comment Letter from the Langhans family

Dear Scoping Staff for the ADU EIS process:

The Langhans family of the University District respectfully submits our comment letter regarding the proposed changes to AADU/DADU regulations. (see attachment, please)

On behalf of our family, I wish to thank you for holding two open houses; unfortunately our schedule prevented us from attending. But, we have seriously reviewed as much written material as possible, reflecting on how the implementation of this proposal will impact the neighborhood which we have called 'home' since 1955. We believe that our concerns also reflect those of the many other unique and diversified single-family neighborhoods throughout Seattle.

We appreciate the City's outreach process, including opportunities yet to come during the entire EIS process. And we thank you, in advance, for your serious consideration and contemplation of our specific comments.

Sincerely,

Aileen M. Langhans

PS. On a less serious note: Hope your Halloween Day is filled with "good witches"

**ADUEIS**

---

**From:** Tessa Barsic <tessa.barsic@gmail.com>  
**Sent:** Saturday, November 04, 2017 9:28 AM  
**To:** ADUEIS  
**Subject:** Comments for ADU EIS

As a citizen of Seattle's Bryant neighborhood I want to highlight the importance greenspace requirements as the city's ADU zoning laws are reviewed. So many of the new buildings, be they multi dwelling or single family, going up in Seattle are built to within feet of the property line. Builders routinely remove all mature trees and landscaping. This creates the potential for mass erosion problems and will make our city an Emerald City no longer. Allowing a more lenient ADU policy, particularly one allowing more than one ADU on a single family lot, will add to the increasingly over built look of Seattle. Yes, we have a severe housing shortage problem. But "solving" that problem at the expense of our green leafy city solves nothing.

Sincerely,  
Mrs. Tessa Barsic

## ADUEIS

---

**From:** Andy Damis <andy@andydamis.com>  
**Sent:** Saturday, November 04, 2017 12:50 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units EIS

I am in support of all the topics as changed in Alternative 2.

Since RRIO was implemented, most of the original concerns about many of the proposed changes have been ameliorated or eliminated entirely.

The code changes are reasonable and will go a long way in encouraging the growth of this important sector of housing.

These changes should be implemented ASAP in order to address the severe affordable housing shortage in Seattle caused by the unbridled growth we continue to experience.

Andy Damis  
523 28th Ave E  
Seattle, WA 98112  
206-351-9243

## ADUEIS

---

**From:** David Cox <davidacox604@gmail.com>  
**Sent:** Sunday, November 05, 2017 12:52 PM  
**To:** ADUEIS  
**Subject:** ADU/DADU changes

I am happy to hear there is scrutiny of the rules holding back implementation of ADU/DADU units in the city.

I particularly want to comment on the proposed changes to parking requirements. These would totally stop us from adding a DADU to my large lot, something we would like to do in the future.

While I would very much like to see the requirement for off-street parking removed, I also suggest that this be modified a bit to look at the parking density for a neighborhood in deciding if off-street parking requirements can be removed. Some neighborhoods could not support it.

My neighborhood can, so I am looking forward to this change.

Thank you

David A. Cox  
1710 NE 86th St  
Seattle, WA 98115-3242  
206-890-9470  
[davidacox604@gmail.com](mailto:davidacox604@gmail.com)

--  
Dave

**ADUEIS**

---

**From:** Low Cook <lowcook@hotmail.com>  
**Sent:** Monday, November 06, 2017 6:29 AM  
**To:** ADUEIS  
**Subject:** ADU EIS

I am totally against allowing multiple ADU units in neighborhoods and against removing the off street restriction.

Neighborhood density decreases the quality of life by adding traffic, noise and demand for infrastructure. Try living next to a boarding house yourselves and witness first-hand the impact on a single family neighborhood. Parking, waste services, energy, communication pipelines and pedestrian safety are costs unfunded.

Get [Outlook for Android](#)

**ADUEIS**

---

**From:** Kim <kmfrost1965@comcast.net>  
**Sent:** Monday, November 06, 2017 7:01 AM  
**To:** ADUEIS  
**Subject:** ADU bill

I am vehemently opposed to allowing small dwelling units on single family homes. We do not have the infrastructure to support this, namely parking, then public transportation. We need to maintain the integrity of our neighborhoods. If people want city living in smaller spaces, there are plenty of condos/apartments available in the city. Plus, there is a tremendous amount more that are developed. Keep the neighborhoods in tack.

Thank you,  
Kim Frost

*Kim*

*'forget the rules, find your own voice, fight to be heard—with ever greater inclusivity and diversity!'*

**ADUEIS**

---

**From:** cynthia goodwin <cynthiacgoodwin@yahoo.com>  
**Sent:** Monday, November 06, 2017 7:54 AM  
**To:** ADUEIS  
**Subject:** ADU public Feedback

I support increasing the ease of putting a small house or ADU in my back yard.

I have lived on Beacon Hill for 25 years - I see that the young people who graduate (my son's friends) from Franklin High School cannot continue to live in this area but they work here. And they are working at QFC or the restaurants that the higher income new residents use daily.

I live in a small craftsman style house 3 blocks from light rail on 25th. I have a house to my self. I still work and I will age in place.

- my house won't be available for a new family
- I can easily make room for younger renters who don't yet have a car
- they can access light rail for work

We need to use the current residential homes to make space to help the lower income, but socially and economically contributing, young people.

Please don't make the lot size requirements too big for the homes of the respective areas. My lot is not big like some of the lots in other parts of the city.

With empty nesters, having a small unit will not tax their water system since we are not a young family with a lot of members. And the person renting will move on as their social unit or family grows. The unit I am thinking of would accommodate a single person.

Thank you- Cindy Goodwin

Cynthiacgoodwin@yahoo.com

Sent from my iPad

**ADUEIS**

---

**From:** RICHARD SCHWARTZ <cruzahome65@gmail.com>  
**Sent:** Monday, November 06, 2017 10:23 AM  
**To:** ADUEIS  
**Subject:** Backyard dwelling units

In the past, legislation allowing backyard dwelling unit expansion has targeted specific areas of the city, not the entire city. This approach provides an economic advantage (rental income) to some but not others. As a retired person trying to live on a fixed income in an increasingly high cost of living city I don't think where you live should be a factor in whether this income option is available. If it is going to be available to some it should be implemented city wide and available to all.

Thank you,  
Richard Schwartz

**ADUEIS**

---

**From:** JON <jonboyce@comcast.net>  
**Sent:** Monday, November 06, 2017 3:43 PM  
**To:** ADUEIS  
**Subject:** Backyard cottage EIS

Hello:

I am very discouraged the City is embarking on a plan to turn single-family neighborhoods into high density living areas by allowing additional living spaces on almost every lot in the City. I thought we went through a Comprehensive Planning process to identify Urban Villages in the City that make sense. Increase the density in areas where there are services and transportation infrastructure reasonably close to where people live. This proposal takes a shotgun approach to the City regardless of whether there are walkable areas to services, whether there are transit lines close by, and whether there is adequate parking to accommodate all the people living in these new structures.

The areas I would like to see included in the scoping process and made part of the EIS include:

Purpose statement:

I would like to see a clearly articulated purpose statement for the project. I don't believe increasing neighborhood density will improve affordable housing. I live in a neighborhood where \$1 million homes are torn down and replaced by triplexes on the market for \$700,000 each. That approach isn't helping create affordable housing.

Alternatives:

I would like to see an alternative focusing this proposal only on areas previously identified by the City as Urban Villages.

Elements of the environment:

NATURAL

Air

I would like an extensive evaluation of the impacts to air quality in the City from this proposal. Increasing density in neighborhoods all across the City will mean more cars - more cars driving around looking for existingly rare parking spaces on the street - more cars wasting gas and emitting fumes - in every neighborhood.

Water

I would like a thorough examination of the affect on surface water runoff in the City by covering every lot in the City with more structures instead of seeping into the ground by the current lot coverage restrictions. What impacts will that have on our existing sewage system and what will the costs to citizens be to upgrade those systems to handle all the new living spaces.

## BUILT

### Relationship to plans

I would like a complete discussion of how this proposal relates to existing land use plans like the Comp Plan. How will this proposal impact the approach the City worked to achieve in the Comp Plan by working with each neighborhood?

### Aesthetics

What impacts will there be to the look and feel of our neighborhoods by adding 1 or 2 extra buildings on every lot? Each neighborhood in Seattle has a distinct feel to it and that has been one of the charms of the City and drawn people here. What happens when all neighborhoods have a congested look with nothing but houses crowded together on every street?

### Recreation

Increasing density will increase population. Increasing the population will increase demand for City services for Parks. What will the impact be of this proposal on our existing Parks system? Will there be a need to purchase more property in the City to accommodate the increasing population and what will the cost be to citizens?

### Transportation

Rigorous analyses of the impacts to transportation within the City will be essential to this EIS. If the proposal allows additional living structures to be built on almost every lot, what is the worst case scenario in terms of traffic throughout the City? What will be the change in level of service at intersections throughout the City? How many intersections will need a new stoplight to mitigate traffic flow issues? What will that cost be? How will it affect the movement of commercial traffic within the City serving the small businesses in the various neighborhoods? What is the estimated increase in traffic/pedestrian/bike accidents associated with this proposal?

### Public Services

Increasing density with backyard cottages throughout the City will impact all public services. I would like the EIS to address the impacts to schools, fire and police services, solid waste/recycling, parks (see above) and busing. Where will the funding come from to scale up these services to address these impacts from an increased population throughout the City.

I urge the City to focus this proposal to areas like the Urban Villages where the neighborhoods have already agreed that it made sense to develop higher densities near existing services. Use that as a starting point and then go through the process of working with the neighborhoods to expand the Urban Village boundaries. This scattered, broad brush approach that is the focus of this EIS could cause impacts to the neighborhoods that are unrepairable.

Sincerely,

Jon Boyce

**ADUEIS**

---

**From:** Dawn Mullarkey <dawn.mullarkey@gmail.com>  
**Sent:** Tuesday, November 07, 2017 8:50 AM  
**To:** ADUEIS  
**Subject:** Single families who have invested in this city are being punished

Building infrastructure to support proposed zoning should ideally happen before growth, but at the very least should be concurrent with zoning plans - Transportation, parking, congestion, access, social services, emergency services – are all infrastructure issues critical to the success of any zoning effort and must be considered. To make sweeping zoning changes without infrastructure commitment is irresponsible city management.

In 2015, Danny Westneat wrote a column in the Seattle Times about single family zoning research that included this information -

'a study of Seattle's developable land found that there's enough capacity under current zoning to add 224,000 housing units — 73 percent more than the current stock of 308,000'. Those figures have likely changed in two years, but it's valuable data nonetheless. And, would seem to indicate that the city's current direction of changing all single family lot zoning to multiple structure zoning is unwarranted.

**ADUEIS**

---

**From:** B Stamnes <rstamnes@yahoo.com>  
**Sent:** Tuesday, November 07, 2017 2:01 PM  
**To:** ADUEIS  
**Subject:** Re: scoping comments

Comment on Crown Hill Rezoning

West Broadview has suffered sewer backup into homes and basements. The solution presented by SPU is to route additional flow into pump station in Carkeek Park after the canal expansion has been completed. We are concerned that adding the tremendous amount of sanitary sewage from the rezoning of Crown Hill will take the extra capacity either in Carkeek Park or in the Canal storage/pumping facility, preventing resolution of the West Broadview sewer backup due to lack of capacity.

The impact, like this, and including this, on surrounding areas should be a part of the scoping of the EIS

Bob Stamnes

---

**From:** ADUEIS <ADUEIS@seattle.gov>  
**To:** B Stamnes <rstamnes@yahoo.com>  
**Sent:** Tuesday, November 7, 2017 11:47 AM  
**Subject:** RE: scoping comments

Bob,  
 Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process. **Note that we extended the comment period 15 days to November 16.**

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** B Stamnes [mailto:rstamnes@yahoo.com]  
**Sent:** Thursday, November 02, 2017 11:02 AM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** scoping comments

There are areas of Seattle that are experiencing sewer overflows into homes and basements as well as extensive drainage issues, like that found in Broadview. These areas should be excluded from any further development until the City has improved the infrastructure for these utilities ensuring no further drainage or sewer backups after considering the potential impact from these added sources.

The EIS should also consider the appearance of the neighborhood and ensure it does not change due to additional cars on the street, additional overhead wires, etc.

Bob Stamnes

**ADUEIS**

---

**From:** Arn Slettebak <aslett5308@comcast.net>  
**Sent:** Tuesday, November 07, 2017 5:22 PM  
**To:** ADUEIS  
**Subject:** DADU

Attached Accessory Dwelling Units in single-family zoned neighborhoods are a terrible idea. The quality of life will be further degraded if they are permitted. Biodiversity in the city will suffer due to the loss of a more diverse flora (trees, shrubs and forbs), which in turn presently supports many species of resident and migratory birds (for example). The consequent over-crowding will also further impact the parking situation on the streets (as well as on the individual properties).

**ADUEIS**

---

**From:** Josh Gerak <joshgerak@gmail.com>  
**Sent:** Wednesday, November 08, 2017 9:42 AM  
**To:** ADUEIS  
**Subject:** Comment about ADU/DADU changes

Mike O'Brien's proposed changes to the DADU / ADU laws are a good first step to address the housing affordability crisis in Seattle. These should be implemented immediately.

Seattle has changed permanently. Gridlock is upon us, now. We need people to live IN the city, not outside of it. Until mass transit gets ramped up, we need more people living in city. Modifying the requirements for DADU and ADU is an immediate step forward.

Sure, some homeowners are going to lose street parking. But that is a small price to pay to expand affordable housing. As our city grows, more and more people are opting for alternative transportation methods. Many are moving into the city without cars, so the impact will not be as severe as many fear.

Those living in ritzy neighborhoods must bear the burden of higher density, just like the lower economic areas. It should be the choice of a homeowner to be able to add an ADU or DADU. This extra income also offers the ability of a homeowner to afford to live in Seattle.

Please implement these changes immediately!

--

All the best,  
Josh Gerak  
Seattle Resident & Property Owner  
206-300-0349 phone

## ADUEIS

---

**From:** John Clark <gorai@comcast.net>  
**Sent:** Wednesday, November 08, 2017 4:27 PM  
**To:** ADUEIS  
**Subject:** Comments re adus changes

Living in a dense, vital neighborhood I would change nothing. Given the crisis in affordable housing I realize change is needed.

I would like to see the option of adu's and dadu's in what are now single family home lots with regulation and oversight of the developments to include light and vegetation effects on the neighborhood, Traffic and parking effects, and ensure quality work by requiring the owner to live in one unit. Also to only allow long term leasing so it is really affordable housing and not hotel beds.

I live in Queen Anne.

I am not sure if this is the correct site for my comments, if not, please redirect me!

Thank you

Pat Gorai

**ADUEIS**

---

**From:** Greg Kromholtz <g.kromholtz@comcast.net>  
**Sent:** Thursday, November 09, 2017 10:56 AM  
**To:** ADUEIS; O'Brien, Mike  
**Cc:** Kromholtz, Susan  
**Subject:** Accessory Dwelling Units EIS

I am a property owner on 9<sup>th</sup> Ave NW in Broadview and would like to offer my following comments on this topic:

1. I am not categorically opposed to changes to regulations regarding ADUs, but I do not support a one-size-fits all approach. I think these changes should be focused on areas that are good candidates for becoming urban villages. Such areas should:
  - a. Have good public transit access
  - b. Have nearby (within a few blocks) existing commercially zoned areas that people can walk to obtain their everyday needs (groceries, pharmaceuticals, hair salons, hardware, etc.)
  - c. Generally be on or near major arterials (which is compatible with the above).
2. I do not support pushing high density housing into existing, quiet, single-family neighborhoods that do not meet the above criteria.
3. If the city is open to a flexible approach rather than one-size-fits-all, I could support the addition of a limited number of ADUs in neighborhoods described in 2. Limits I would suggest include:
  - a. Ensuring that, in neighborhoods that do not have excellent public transit offerings, there is adequate parking for one additional car per ADU added. We need to be realistic and recognize that in neighborhoods that do not meet the criteria in 1. people moving into new ADUs will need cars to conduct their lives. Just increasing population density in these areas will only increase street crowding.
  - b. In neighborhoods as described in 2. the number of additional ADUs should be limited to ensure the character of the neighborhood is preserved. For instance, limiting the number of new ADUs to a maximum of X units per square mile and the number per block to no more than one for each three existing single-family homes on a block.
  - c. All AADUs or DADUs should have an owner occupation requirement in such neighborhoods, to maintain local owners with pride in their neighborhood, which is critical to maintaining the character of such neighborhoods.

Sincerely,

Greg Kromholtz  
Broadview

## ADUEIS

---

**From:** Robert Drucker <robert@druckerarchitects.com>  
**Sent:** Thursday, November 09, 2017 3:32 PM  
**To:** ADUEIS  
**Subject:** ADU EIS Scoping comment

Recognizing that the City of Seattle is not a monolith, but rather is an assemblage of neighborhoods, each with its own history, land-use patterns, and neighborhood plans:

All E.I.S. topics should be addressed separately for each neighborhood, to ensure that any ADU changes are appropriate for the specific location. The seven Council Districts are not an appropriate division as they bear no relationship to the aforementioned history and land-use patterns; the original 13 neighborhood boundaries should be used. In fact, the E.I.S. should be formatted into 13 separate sections, each section including each of the E.I.S. study topics.

Robert Drucker

### Robert Drucker Architect

3226 Northwest 69th Street, Seattle Washington 98117

*Certified Sustainable Building Advisor*

*LEED Accredited Professional*

*Registered Architect*

w.206.706.5740

[robert@druckerarchitects.com](mailto:robert@druckerarchitects.com)

**ADUEIS**

---

**From:** Tom Donnelly <tdonnelly727@gmail.com>  
**Sent:** Thursday, November 09, 2017 3:52 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling units

A couple of thoughts on ADU's.

First, they should fit the theme or general design of the neighborhood. For example in a 1920's neighborhood a rectangular box which seems to be the current popular cheap design would not fit the neighborhood "flavor".

Second, if the City is really serious about ADU's as one of the solutions to the housing issue then the utilities should be run down the alleys. As it stands now the ADU has to be tied to the water, sewer, and electricity that supplies the main house and these utilities almost always are located in or over the street in front of the main house.

I also feel that an upgrade of the utilities will be needed in order for this level of density to be accommodated. Since the City doesn't feel like charging developers of larger buildings for providing funding for infrastructure, I would hope the homeowners would not be further burdened either.

The environmental impact of not supplying improved utilities will be either a breakdown of a critical system possibly with a sanitary danger.

Bottom line, if the City wants increased density it will have to find funds for it and the homeowners are tapped out.

Tom Donnelly  
727 N 70th ST.  
Seattle, 98103

**ADUEIS**

---

**From:** Deborah Fishler <deborahfishler@earthlink.net>  
**Sent:** Thursday, November 09, 2017 4:00 PM  
**To:** ADUEIS; O'Brien, Mike  
**Subject:** Accessory Dwelling Units EIS

1. I am not categorically opposed to changes to regulations regarding ADUs, but I do not support a one-size-fits all approach. I think these changes should be focused on areas that are good candidates. Such areas should: a. Have good public transit access b. Have nearby (within a few blocks) existing commercially zoned areas that people can walk to obtain their everyday needs (groceries, pharmaceuticals, hair salons, hardware, etc.), and c. Be ON major arterials (which are compatible with the above).
2. I do not support pushing high density housing into existing, quiet, single-family neighborhoods that do not meet the above criteria.
3. If the city is open to a flexible approach rather than one-size-fits-all, I could support the addition of a limited number of ADUs in neighborhoods described in 2. Limits I would suggest include: a. Ensuring that, in neighborhoods that do not have excellent public transit offerings, there is adequate parking for one additional car per ADU added. We need to be realistic and recognize that in neighborhoods that do not meet the criteria in 1. people moving into new ADUs will need cars to conduct their lives. Just increasing population density in these areas will only increase street crowding which is already happening because the City has approved the construction of apartments and condos with inadequate parking space requirements. b. In neighborhoods as described in 2. the number of additional ADUs should be limited to ensure the character of the neighborhood is preserved. For instance, limiting the number of new ADUs to a maximum of X units per square mile and the number per block to no more than one for each three existing single-family homes on a block. c. All AADUs or DADUs should have an owner occupation requirement, to maintain local owners with pride in their neighborhood, which is critical to maintaining the character of such neighborhoods.

Thanks for listening.

Deborah Fishler

**ADUEIS**

---

**From:** Roseanne <roseanne@net-venture.com>  
**Sent:** Thursday, November 09, 2017 6:30 PM  
**To:** ADUEIS  
**Subject:** Comments on proposed ADU/DADU code changes

Please accept these comments on the proposed ADU/DADU code changes. Please, could you let me know these comments were received?

Thank you,  
Roseanne Lorenzana

---

**Comments from Roseanne Lorenzana  
Beacon Hill neighborhood**

**A. Comments on Codes**

1. Eliminate requirement for DADU to be in rear yard, as some existing homes have more front yard space than backyard space.
2. State lot coverage as a maximum for all habitable structures, rather than dictate only rear yard coverage.
3. Since the point is to increase density, make setbacks consistent or similar to LR1 zoning.
4. Provide a streamlined review process. A streamlined process is available for other upzones, such as LR1.

**B. Comments on Owner-Occupancy Requirement**

I am concerned about the proposed removal of the owner-occupancy requirement. Without commenting on that requirement, instead I provide the following recommendations to encourage owner-occupants to develop ADU/DADUs. Emphasis is on "existing owners" so as to discourage developers who could create triplex multi-family developments without owner occupancy. Owner-Occupancy could be determined by real estate tax documentation:

- (1) Provide credits to existing owner-occupied SFR to offset fees and financial burden associated developing ADU/DADU. Give additional credit for:
  - Green building performance
  - Off street parking
  - To encourage geographic dispersal of ADU/DADU, give credit for creating ADU/DADU outside an urban center, urban village or station area overlay district.
- (2) For owner-occupied SFR that create ADU/DADU, give 5 year real estate tax break. This would require owner-occupancy for the full 5 year period.
- (3) Provide credits to existing owner-occupied SFR to offset fees and financial burden associated with SPU required side sewer, SDOT required street repair/improvement and SCL required upgrade of electrical service.

**C. Comments on Neighborhood Involvement**

Identify areas where affordable housing needs are high and displacement risk is high, such as the Beacon Hill neighborhood. Require the City to work with those neighborhoods to develop an Affordable Housing Special District Overlay to create alternative development standards unique to that group of properties. Such an ordinance can add a new subsection that encourages affordable housing. An example is provided by the proposed changes to the King County Comprehensive Plan and the Vashon-Maury Island Community Service Area subarea plan regarding an affordable housing incentive Special District Overlay. However, unlike the proposed Vashon Island plan which only gives density credits to encourage affordable housing (and since allowing up to 2 ADU/DADU in essence is a density credit) give credit for:

- Green building performance
- Off street parking
- To encourage geographic dispersal of ADU/DADU, give credit for creating ADU/DADU outside an urban center, urban village or station area overlay district.

## ADUEIS

---

**From:** Matt Tilghman-Havens <mtilghmanhavens@gmail.com>  
**Sent:** Thursday, November 09, 2017 9:41 PM  
**To:** ADUEIS  
**Subject:** Parking requirements

I would ask that the scope of the EIS include study of the impact that current parking requirements have on the cost of developing ADUs (the expense of the status quo) versus elimination of the parking requirement.

Further, it would be valuable to get a sense of the opportunities afforded by expanding allowable square footage for DADUs on various lot sizes.

We have a housing shortage! We must address it!

Thank you for your service to our city!

Matt Tilghman-Havens  
630 32nd Ave, Seattle 98122

## ADUEIS

---

**From:** Joanna Plattner Mattson <joannapmattson@gmail.com>  
**Sent:** Thursday, November 09, 2017 10:53 PM  
**To:** ADUEIS  
**Subject:** Please don't rush into zoning changes for single family homes

Hello

I am writing to urge the city to reconsider its plan to eliminate single family home zones in the city at a time when local schools are bursting at the seams.

In addition, allowing more density in expensive neighborhoods is unlikely to increase affordability. For every historic home that is torn down to make room for three units it's inevitable that the new units will be designed and priced to appeal to wealth buyers - this is how developers maximize profits.

I am strongly opposed to Mike O'Brien's proposal.

Joanna Mattson  
1515 5th Ave west  
Seattle 98119

## ADUEIS

---

**From:** Anne Rose <obanelar@gmail.com>  
**Sent:** Friday, November 10, 2017 11:22 AM  
**To:** ADUEIS; O'Brien, Mike  
**Subject:** Proposed Seattle Single Family Lot Rezone Plan

Seattle City Council:

I am writing today to comment on the Alternative 2 rezone proposal of single family lots to allow multiple dwelling units.

Alternative 2 is out of scale and character for single family development.

It is incompatible with Single Family zoning.

As there is no requirement for owner occupancy, the most likely scenario is that developers will buy a single family home and build 2 additional units and rent out the property for up to 12 people.

With no requirement for parking, the demand for on-street parking will quickly outpace the supply. We have very limited bus service in our neighborhood, and the walking distance to a grocery store is many blocks, making a car necessary.

In all probability these homes and units would be used for AIRBNB and VRBO, which does nothing for increasing housing availability or affordability.

This plan will negatively impact vegetation, the tree canopy, locally environmentally critical areas and the storm water sewage system, which is barely handling the current demand.

The visual character of our beautiful neighborhoods will be changed for the worse.

The rezoning and converting of properties owned and occupied by current Seattle residents deserves a full and complete study of the consequences. Every current Seattle resident homeowner has the right to be absolutely informed and provide input and comment upon this largest proposed change in land use in the history of Seattle.

I strongly support Alternative 1 (No action).

Anne Rose

[obanelar@gmail.com](mailto:obanelar@gmail.com)

**ADUEIS**

---

**From:** John Mensher <gailjohn72@gmail.com>  
**Sent:** Friday, November 10, 2017 2:29 PM  
**To:** ADUEIS  
**Subject:** Re: Back Yard Buildings--

Thanks so much for your reply. I need to add our address: Gail and John Mensher: 1612 8th Avenue West; Seattle 98119

On 11/10/17 1:06 PM, "ADUEIS" <ADUEIS@seattle.gov> wrote:

>Gail and John,

>

>Thank you for your comment. We will consider all comments at the end of  
 >the comment period as we determine the final scope of the study for the  
 >Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.  
 >Note that we extended the comment period 15 days to November 16.

>

>Best,

>

>Aly Pennucci & Nick Welch

>

>\* Accessory Dwelling Units (ADUs) include backyard cottages, known as  
 >Detached Accessory Dwelling Units (DADUs), and in-law apartments, known  
 >as Attached Accessory Dwelling Units (AADUs)

>

>-----Original Message-----

>From: John Mensher M.D. [mailto:gailjohn72@gmail.com]  
 >Sent: Tuesday, November 07, 2017 2:01 PM  
 >To: ADUEIS <ADUEIS@seattle.gov>  
 >Subject: Back Yard Buildings--

>

>Dear Sirs,

>

>We would like to add our voices expressing dismay at the proposal to  
 >allow backyard house constructions (dadus) in all of Seattle regardless  
 >of environmental impacts, lack of required parking spaces,  
 >transportation and congestion issues and much more. We have seen the  
 >effect of jamming poorly built structures on Queen Anne; they destroy  
 >the neighborhood integrity of small but historic homes as they require  
 >chopping down trees that once provided oxygen, removed carbon dioxide  
 >and absorbed rain water run-off from our fragile environment. And these so-called "affordable"  
 >housing units are not that at all but expensive with the ubiquitous  
 >"luxury" descriptions given them no matter how small. In fact, many  
 >dadu owners are renting them on vacation websites for exorbitant prices  
 >to out of towners, not for actual Seattlelites.

>

>In addition, companies such as the Tolt brothers are laying waste to  
>large sections of our community to install over-height, crowded units  
>where once there was a children's home and open spaces. What have they  
>given to the city in return? One wonders how this happens! Do the  
>contractors pay taxes or donate to improving remaining open spaces or  
>just grease some palms? Presumably all those new "home owners" will be  
>property tax payers but are the proud owners of dadus in their  
>backyards facing seriously higher property taxes? Those of us holding  
>the line against backyard in-fill certainly see our property taxes  
>shooting up for no apparent rationale or improvements. Where is the  
>attention to fixing bad roads and streets beat up by construction crews and big machinery?  
>Are we mostly just paying for the Big Dig and Bertha?

>

>How about planning locations for new units on main arterials where bus  
>lines and walkable shopping areas are nearby and where commercial  
>buildings are already zoned? How about insisting on parking spaces (dig  
>that hole deep enough!) for each new unit? Not everyone is willing/able  
>to bike to the grocery store despite the influx of dangerous (for the  
>lack of required helmets!) green and yellow bicycles. In sum, if the  
>city council actually approves this dadu expansion as written, it will  
>be hastening the decline of neighborhoods that actually make Seattle  
>livable. Don't do it!

>

>Sincerely,  
>Gail and John Mensher

>

>

>

**ADUEIS**

**From:** Cynthia <cynthjy@aol.com>  
**Sent:** Friday, November 10, 2017 3:11 PM  
**To:** ADUEIS

Hello, I appreciate the residents being able to give input on the ADU DADU issues in Seattle. I tried to fill out the online questions, but had some difficulty with the online questionnaire....below are my preferences and I have to say I like the idea of AADU and DADU's so much better than the high rise condo/apartments buildings to help keep the neighborhood character in Seattle yet allow for growth. cynthia

1. alternative 2 is my preference AADU and DADu allowed
2. alternative 1 is my preference, one parking space required and I like the idea of more perhaps with an incentive?
3. alternative 2 is my preference, owner does not have to live there
4. alternative 2, minimum lot size 3,200
5. alternative 2, 1000 sq ft excluding garage/storage
6. really hard to give an opinion on this one, wording vague, "depending on lot width" ??
7. looks like no choice here
8. alternative 2 more space can be taken up with these units
9. alternative 2 entrance requirements more flexible
10. alternative 2
11. alternative 2
12. no choice
13. no choice

	<b>Alternative 1 (No Action)</b>	<b>Alternative 2</b>
<b>1 Number of ADUs allowed on a single-family lot</b>	A single-family lot can have one AADU or one DADU, but not both.	A single-family lot can have an AADU and a DADU.
<b>2 Parking</b>	One off-street parking space required for an AADU or DADU unless the lot is in an urban village.	No off-street parking required.

3	<b>Owner-occupancy</b>	An owner must occupy either the main house or the AADU/DADU 6 months a year.	No requirement for an owner to occupy the house, AADU, or DADU.
4	<b>Minimum lot size for a DADU</b>	4,000 square feet	3,200 square feet
5	<b>Maximum square footage</b>	<b>AADU</b> 1,000 square feet, including garage and storage areas  <b>DADU</b> 800 square feet including garage and storage areas	<b>AADU</b> 1,000 square feet, excluding garage and storage areas  <b>DADU</b> 1,000 square feet, excluding garage and storage areas
6	<b>Maximum height</b>	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Height limits are 1-3 feet higher than existing limits, depending on lot width.
7	<b>Lot coverage limit</b>	35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.	
8	<b>Rear yard coverage limit</b>	40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.
9	<b>Location of entries</b>	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.	DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

<b>10 Roof features</b>	No exceptions from the height limit are allowed for roof features on accessory structures.	Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
<b>11 Household size</b>	Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.	Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.
<b>12 MHA requirements</b>	Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.	
<b>13 Rental Registration &amp; Inspection Ordinance (RRIO)</b>	Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.	

**ADUEIS**

---

**From:** Amy <amy\_barnett100@msn.com>  
**Sent:** Friday, November 10, 2017 4:49 PM  
**To:** ADUEIS  
**Subject:** comments

ADU/EIS Committee-

I am an architect and homeowner in the Queen Anne neighborhood. While I believe that increasing density is necessary to provide needed housing and accommodate growth, I am concerned about a number of items listed in the proposal to change the rules for accessory dwelling units, including the following:

Parking: The proposal to eliminate any requirements to provide parking is of concern. In some neighborhoods there is plenty of street parking, but that is not the case in many areas, and is often the cause of a lot of tension. It seems like a one-size fits all approach is not appropriate when determining the parking requirements. For areas that are not urban villages, transit service is likely not as frequent or convenient, so most households will have a car. Perhaps the land use rules regulating where parking is allowed could be adjusted for these types of projects, or some type of screening of parking required instead of entirely eliminating parking. Also, if 2 additional units are proposed on a property, it seems at least one should be required to have off-street parking.

Tree Canopy/Privacy: More density will inevitably lead to loss of trees, but I believe preserving these green spaces is vitally important for maintaining livability in Seattle, and ways to preserve trees should be carefully considered in the study.

Owner Occupancy: Previous rules required one of the units on the property to be owner occupied. If this requirement is eliminated, I feel we will have a big increase in developers buying up single family homes and adding both an ADU and a DADU to the property. Investors could purchase multiple properties for short term rentals like Air BNB. This would cause displacement of current homeowners and would not provide any additional affordable housing for full-time residents.

New Construction: While this policy was originally developed to allow for legal mother-in-law type apartments in existing single family homes, if the new rules are adopted, is there anything to prevent a developer from buying a small single family home, tearing it down and erecting a large house with both an ADU and a DADU on the same lot? The original concept allowed the existing fabric and character of the neighborhoods to be preserved. In order to minimize impacts on the character and scale of the neighborhoods while accommodating needed increases in density, perhaps the ADU + DADU option should not be available for new construction, but only in single family residences that have been established for a certain number of years.

I recognize the need to increase density, but believe changes in this policy need to be made very carefully in order to prevent displacement of existing homeowners and help preserve livability of our neighborhoods. Thank you for the opportunity to comment on this issue.

Amy Barnett  
1702 Warren Ave N  
Seattle, WA 98109  
Amy\_barnett100@msn.com

**ADUEIS**

---

**From:** Michael Bronsdon <michael@bronsdon.com>  
**Sent:** Saturday, November 11, 2017 11:43 AM  
**To:** ADUEIS  
**Cc:** Michael Bronsdon  
**Subject:** I do not support the proposed DADU/ADU changes

Dear Aly,

I do not support the proposed DADU/ADU changes, as I believe they will adversely affect livability in Seattle.

One of Seattle's historic strengths is its single-family neighborhoods. The proposed changes would impact these neighborhoods in adverse ways. To wit:

- 1) Tree canopy. Allowing DADUs on ever smaller lots will have a negative impact on tree canopy in single-family neighborhoods, especially urban areas with many smaller lots. Seattle is already losing its tree canopy at an alarming rate, and this change in the law would accelerate that trend.
- 2) Sewer lines and outflows. Combined sewer overflows are already a problem in many neighborhoods, and this legislation will add housing units that will contribute more sewage, which will increase pollution in our lakes and waterways.
- 3) 3) Density/Parking/Traffic. While it is true that current regulations already allow 8 unrelated people to share a single-family home, that is more of a theoretical possibility than a common occurrence. Changing the rules to allow and encourage more DADUs on single-family lots, and to allow both a DADU and an ADU on the same single-family lot, will significantly increase the average number of adults living on a single-family lot, which will lead to more cars in the block/neighborhood. The proposed legislation increases the limit for a residential lot to 12 and makes it much more likely that 12 unrelated adults will live on one 3,200sf lot. BOTH of these factors must be taken into account in an EIS.
- 4) 4) There is no doubt that developers are poised to exploit every detail of these new regulations to make as much money as possible, that's OK, that's America, but the behavior of institutional capital must be considered when we make a change to an inventory of 100,000 home sites.

Thank you for your consideration,  
Michael

Michael Bronsdon  
2701 11<sup>th</sup> Avenue East

Seattle 98102

206.799.7614

## ADUEIS

---

**From:** Chris Lewis <cslewis@lewis-smith.com>  
**Sent:** Sunday, November 12, 2017 10:25 AM  
**To:** ADUEIS  
**Subject:** Adu

I am all for the allowance of a second adu where an adu already exists. I am 100% against the removal of the owner occupancy requirement.

Chris Lewis

Sent from my iPhone

**ADUEIS**

---

**From:** Teresa Dietze <zinniabloom@comcast.net>  
**Sent:** Monday, November 13, 2017 6:23 AM  
**To:** ADUEIS  
**Subject:** ADUs

Good Morning,

I had a bid done for an ADU and it came in exorbitant. (600K/800 sf) This was due in part to 97,000 in permitting fees! Part of it was due to builders raising costs and materials going up.

A client of mine who is a high level banker, partly in real estate, told me that several of his friends and associates asked him to help determine whether or not it made financial sense to build an ADU. He evaluated and it really didn't. The costs are out of hand. I know some people do it, and I have toured at least 15 of these ADUs in progress or completed. I also spoke with the owners. These ADUs were all built with cost as the main driver because of these issues, and frankly, I didn't like their quality. Also, more than half of the people who had them built were very stressed over cost over-runs. The only fairly nice ones where the people were doing well were those where the owner was able to do the building personally.

Another client who is a property manager told me that the City added \$10,000 in fees for ADUs to connect the sewer lines—to fund something else!

Conclusions:

Many more people would build ADUs if it made sense financially.

If we want ADUs to be nice additions to Seattle, that last, and that people want to live in, the costs need to be eased off somehow.

For City planning to use ADUs to benefit Seattle's housing situation, fees and permitting as well as other obstacles must be brought into line to make it feasible for homeowners to build them.

Please consider this comment!

Teresa Dietze

## ADUEIS

---

**From:** Roxane Jude <rxejude@msn.com>  
**Sent:** Monday, November 13, 2017 8:20 AM  
**To:** ADUEIS  
**Subject:** Not the answer

This serves only the property owner and generates more rental income for owners and more parking and over population! That's what started this huge housing crisis in the first place, middle class can no longer afford home ownership in the city of Seattle and now expanded to the burbs!! Why not tear down single homes and build multiples units for more income, I mean places for people to live!  
Not! Seattle has always let Building Contractor Property owners to shape our city!

Roxane Jude  
327 N 134th  
Seattle wa 98133

*Parking nightmare area of Bitterlake!*

## ADUEIS

---

**From:** Susi <sbpope@comcast.net>  
**Sent:** Monday, November 13, 2017 10:30 AM  
**To:** ADUEIS  
**Subject:** Backyard cottage proposal

Dear Seattle government,

As a property owner in Seattle for decades I am strenuously against the proposal to allow 3 dwellings on what is now a single family lot

The proposal does not take into account parking problems, effects on communities and the fact that this is not the solution. It appears to only benefit developers. Please do not allow this ill-thought-out proposal to move forward.

Sincerely

Susan Pope

12735 42nd Ave NE

## ADUEIS

---

**From:** Frances Goldberg <francesgoldberg@me.com>  
**Sent:** Monday, November 13, 2017 10:35 AM  
**To:** ADUEIS  
**Subject:** Parking and environmental inpart

If our city neighborhoods are already at capacity with parking and safety concerns, how in the world will more condensation of people/cars improve our city?

What about city services? What about the environmental impact of densely packed blocks?

Frances Goldberg

“Those who deny freedom to others deserve it not for themselves”

~Abraham Lincoln

**ADUEIS**

---

**From:** Penny thackeray <thackeray.penny@gmail.com>  
**Sent:** Monday, November 13, 2017 10:37 AM  
**To:** ADUEIS  
**Cc:** Kaplan, Martin; mick thackeray Thackeray; Bagshaw, Sally  
**Subject:** I very much hope my voice will be heard.

We have an expert in our QA neighborhood, Martin Kaplan, who has clearly worked hard and long to really figure out and gather data on the impact the single-family up-zone proposal would have on our area. Every observation he has made makes enormous sense. I wish he were on your committee.

However I have to write as a simple resident with no architectural nor city planning experience. All I can tell you is that just one walk around the neighborhood would surely make you aware that we are in no position to add housing. I believe Ms Bagshaw is a Hill dweller and I feel certain she would concur with me. Grocery stores: packed. School yards: too small to let the children play anything that needs a bit of space. Parking: such a nightmare that other stores lose business especially in bad weather (and when do we not have bad weather?) and we can't invite houseguests unless they arrive and depart by cab. Having workmen come means they walk blocks and blocks with their heavy equipment and time charges grow ever higher. Churches spilling over with congregants. Buses jam packed and often seriously delayed by Hill traffic. Light and sun: gone, blocked by buildings that wheedle their way around the current height restriction by not counting garage space, loft space or whatever. Library seething with would-be readers. Mercer Mess.....a worse mess. And so on and so forth, the list goes on.

I want to emphasize that I am not a NIMBY in the uncaring sense of the word. But I do want to maintain the quality of life we once had, ever dwindling, We are now of the age group where we feel too old to move but we would if we could. Several of our friends and neighbors feel the same and the flight of people who DO care about others, give generously, feed and clothe the homeless, will be a huge loss to quality of life for all economic strata We ourselves divested ourselves of a car so as to ride the buses but elderly people have difficulty getting on and off the buses and waiting in the cold.

Planning Committee, please hear my prayer

Penny Thackeray

Victoria Town homes, W Comstock.

**ADUEIS**

---

**From:** johnvick@comcast.net  
**Sent:** Monday, November 13, 2017 11:16 AM  
**To:** ADUEIS  
**Subject:** RE: ADU DADU EIS

Thank you for your prompt response. As to Oregon property tax, I am aware that they have a different property tax rules. However, it would be helpful to know how King County would consider these changes. I have been unable to determine if the county would consider these ADU/DADU changes as property improvements and, therefore, they could recalculate the property value. A definitive statement from them would be helpful.

VN

Victoria Nelson  
Seattle, Washington 98136

---

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Monday, November 13, 2017 10:06 AM  
**To:** johnvick@comcast.net  
**Subject:** RE: ADU DADU EIS

Victoria,

Thank you for your comment. You've raised some questions that we will consider along with all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process. **Note that we extended the comment period 15 days to November 16.**

Regarding your specific comment about property taxes in Portland: Oregon has different property taxation laws than we have in Washington. In 2016 this generated some attention after homeowners had unusually high property tax increases levied on their property. This occurred because of a new Multnomah County policy (later retracted) to re-assess properties with ADUs at fair market value. In Washington, properties are already assessed at fair market value, so addition of an ADU cannot trigger a sudden re-assessment.

We will consider your comment to consider tax implications in the EIS.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** [johnvick@comcast.net](mailto:johnvick@comcast.net) [mailto:[johnvick@comcast.net](mailto:johnvick@comcast.net)]  
**Sent:** Thursday, November 09, 2017 3:27 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** ADU DADU EIS

In looking at Alternate One, I have a few questions:

There have been concerns raised that by removing the Owner/Occupied requirement, local and/or foreign investors will buy these residents and increase rents to re-coop their investments. Some think that by leaving the O/O requirement, home owners will be less likely to charge high rents for these units as it would impact their property taxes and their taxable personal income, (which occurred in Portland, OR). Also, under this proposal, would Seattle exclude the ADU's DADU's from being used as VBRO's or AirBNB so these units would be used for full time residential housing? Could you point me to data that would refute these issues?

There have also been concerns raised about removing the off street parking requirement even though Seattle's single family neighborhoods lack 24/7 public transportation. Individual's renting these units will still need to provide their own transportation for work and other activities. How will Seattle address the lack of public transportation in these neighborhoods?

Is there an assessment of the public utility infrastructure (water/sewer) that illustrates the capabilities for the existing system to support the expanded usage by the DADUs? It is my understanding that in many of these older neighborhoods, the water/sewer systems are very old and cannot support the additional housing volumes.

I appreciate your assistance with these questions and look forward to your response.

Victoria Nelson  
Seattle, Washington 98136

**ADUEIS**

---

**From:** Bill Frank <wofrank@comcast.net>  
**Sent:** Monday, November 13, 2017 11:45 AM  
**To:** ADUEIS  
**Cc:** Burgess, Tim; Durkan, Jenny; Herbold, Lisa; Harrell, Bruce; Sawant, Kshama; Johnson, Rob; Juarez, Debora; Bagshaw, Sally; O'Brien, Mike; Harris-Talley, Kirsten; Gonzalez, Lorena; Pennucci, Aly; Welch, Nicolas; Freeman, Ketil  
**Subject:** Scoping Comments pertaining to the ADU-EIS

Dear All:

As a resident of Seattle since 1976, and a homeowner since 1978, I strongly urge you to reconsider the proposed changes to existing ADU regulations.

I submit as my comments those put forth by the Queen Anne Community Council Land Use Review and Planning Committee and submitted below each proposed change as Alternative 3.

Respectfully.

Bill Frank

Re: Scoping Comments pertaining to the ADU-EIS Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

Hearing Examiner File: W-16-004 Associated File Numbers: Department Reference Numbers: Date: December 13, 2016

Type: SEPA, Design Review, Environmentally Critical Areas Examiner: Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our

city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

Page | 1

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair

Queen Anne Community Council Land Use Review and Planning Committee ADU-EIS Scoping Comments

1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

(Alternative 1) (Alternative 2)

**Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

**City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.

We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.

Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.

Page | 2

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3)

2. Parking:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) OR one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

Existing Land Use Code Regulation

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

City Proposed Change to: No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits- all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread

throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) Queen Anne Adds: One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

### 3. Owner Occupancy:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

City Proposed Change to: No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

Page | 3

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) Queen Anne Adds: No Alternative-Leave owner occupancy requirement unchanged.

### 4. Minimum Lot Size for a DADU:

(Alternative 1) Existing Land Use Code Regulation

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

**(Alternative 2) City Proposed Change to: 3,200 sq ft minimum**

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot size requirement unchanged.**

## 5. Maximum square footage:

**(Alternative 1)****(Alternative 2)****Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas DADU (Backyard Cottage): 800 sq ft including garage and storage areas

**City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3)

6. Maximum Height:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No change from existing height limits, which vary by lot width and range from 15-23 feet

City Proposed Change to:

Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3)

Queen Anne Adds: Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

7. Lot Coverage Limit:

(Alternative 1) Existing Land Use Code Regulation

35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) City Proposed Change to:

No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage requirement unchanged

Page | 5

#### 8. Rear Yard Coverage Limit:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

#### City Proposed Change to:

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

#### 9. Location of Entries:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

#### City Proposed Change to:

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.

(Alternative 3)

10. RoofFeatures:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No exceptions for roof features on accessory structures are allowed.

City Proposed Change to:

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Roof Features requirement unchanged

Page | 6

11. HouseholdSize:

(Alternative 1)

(Alternative 2)

Existing Land Use Code Regulation

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

City Proposed Change to:

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave Household Size requirement unchanged**

12. MHAR requirements:

**(Alternative 1) Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

**(Alternative 2) City Proposed Change to:**

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.

**(Alternative 3) Queen Anne Adds: Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.**

13. Rental Registration and Inspection Ordinance (RRIO): **(Alternative 1) Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for

inspections to ensure housing is safe and meets basic maintenance requirements.

**(Alternative 2) City Proposed Change to:**

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.

**(Alternative 3) Queen Anne Adds: No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.**

14. Issues of Concurrency

**Concerns:** The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12.

We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure before said growth occurs. This

has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:

**A. Schools:** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on- ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** Bill Frank <wofrank@comcast.net>  
**Sent:** Monday, November 13, 2017 11:45 AM  
**To:** ADUEIS  
**Cc:** Burgess, Tim; Durkan, Jenny; Herbold, Lisa; Harrell, Bruce; Sawant, Kshama; Johnson, Rob; Juarez, Debora; Bagshaw, Sally; O'Brien, Mike; Harris-Talley, Kirsten; Gonzalez, Lorena; Pennucci, Aly; Welch, Nicolas; Freeman, Ketil  
**Subject:** Scoping Comments pertaining to the ADU-EIS

Dear All:

As a resident of Seattle since 1976, and a homeowner since 1978, I strongly urge you to reconsider the proposed changes to existing ADU regulations.

I submit as my comments those put forth by the Queen Anne Community Council Land Use Review and Planning Committee and submitted below each proposed change as Alternative 3.

Respectfully,

Bill Frank

Re: Scoping Comments pertaining to the ADU-EIS Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

Hearing Examiner File: W-16-004 Associated File Numbers: Department Reference Numbers: Date: December 13, 2016

Type: SEPA, Design Review, Environmentally Critical Areas Examiner: Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our

city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

Page | 1

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair

Queen Anne Community Council Land Use Review and Planning Committee ADU-EIS Scoping Comments

1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

(Alternative 1) (Alternative 2)

**Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

**City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.

We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.

Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.

Page | 2

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3)

2. Parking:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) OR one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

Existing Land Use Code Regulation

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

City Proposed Change to: No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits- all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread

throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) Queen Anne Adds: One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

### 3. Owner Occupancy:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

City Proposed Change to: No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

Page | 3

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) Queen Anne Adds: No Alternative-Leave owner occupancy requirement unchanged.

### 4. Minimum Lot Size for a DADU:

#### (Alternative 1) Existing Land Use Code Regulation

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

**(Alternative 2) City Proposed Change to: 3,200 sq ft minimum**

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot size requirement unchanged.**

## 5. Maximum square footage:

**(Alternative 1)****(Alternative 2)****Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas DADU (Backyard Cottage): 800 sq ft including garage and storage areas

**City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3)

6. Maximum Height:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No change from existing height limits, which vary by lot width and range from 15-23 feet

City Proposed Change to:

Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3)

Queen Anne Adds: Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

7. Lot Coverage Limit:

(Alternative 1) Existing Land Use Code Regulation

35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) City Proposed Change to:

No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage requirement unchanged

Page | 5

#### 8. Rear Yard Coverage Limit:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

#### City Proposed Change to:

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

#### 9. Location of Entries:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

#### City Proposed Change to:

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.

(Alternative 3)

10. RoofFeatures:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

#### Existing Land Use Code Regulation

No exceptions for roof features on accessory structures are allowed.

#### City Proposed Change to:

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Roof Features requirement unchanged

Page | 6

11. HouseholdSize:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

#### City Proposed Change to:

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave Household Size requirement unchanged**

12. MHAR requirements:

**(Alternative 1) Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

**(Alternative 2) City Proposed Change to:**

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.

**(Alternative 3) Queen Anne Adds: Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.**

13. Rental Registration and Inspection Ordinance (RRIO): **(Alternative 1) Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for

inspections to ensure housing is safe and meets basic maintenance requirements.

**(Alternative 2) City Proposed Change to:**

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.

**(Alternative 3) Queen Anne Adds: No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.**

14. Issues of Concurrency

**Concerns:** The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12.

We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure before said growth occurs. This

has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:

**A. Schools:** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on- ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

## ADUEIS

---

**From:** Paul Urla <sydneydreaming@comcast.net>  
**Sent:** Monday, November 13, 2017 12:03 PM  
**To:** ADUEIS  
**Subject:** Backyard Cottages

Dear Councilmembers:

I am writing to express my opposition Council Member O'Brien's proposed changes to the City's Backyard Cottage regulations. In this regard, I fully support the comments submitted to you by Marty Kaplan of the Queen Anne Community Council.

I am especially concerned with the proposal to eliminate the owner occupancy requirement. This will doubtless lead to speculation from developers especially with respect to our most affordable homes, thereby driving prices up for first time home buyers in Seattle. This is a wrongheaded and a potentially disastrous mistake at a time when we face an unprecedented housing affordability problem.

Yes, we need to build more affordable housing across the region, but handing over our most affordable single family homes to developers is counterproductive, at best.

Sincerely,

Paul Urla

Sent from my iPhone

## ADUEIS

---

**From:** George Siepak <gsiepak@hotmail.com>  
**Sent:** Monday, November 13, 2017 12:12 PM  
**To:** ADUEIS  
**Subject:** Rezoning

Allowing single family neighborhoods to be destroyed is one of the dumbest things O'Brien has come up with yet. I can't believe this guy even gets the stage.

**ADUEIS**

---

**From:** Patti Wickham <wickk1@comcast.net>  
**Sent:** Monday, November 13, 2017 1:13 PM  
**To:** ADUEIS  
**Cc:** P.R. Wickham  
**Subject:** Proposed Accessory Dwellings

NO to Proposed Accessory Dwellings for the following reasons:

- 1) Each Seattle neighborhood has the right to weigh in through the existing Zoning Changes Process on whether or not their zoned density changes
- 2) If the neighborhood residents agree to a zoning change, then only owner-occupied homes should be allowed to build. This would prevent real estate speculators from purchasing homes, building accessory buildings and (possibly) subverting the intent of this plan. There would also be more ownership of increased density for the neighborhood.
- 3) The Seattle City Council needs to manage the current homeless and low income housing (or lack thereof) BEFORE they attempt to take on more. There seems to be little oversight on the homeless/low income housing that Seattle is currently working with and on.
- 4) Seattle Gov't needs to stop allowing the Builders to pay a fee versus building affordable units in the buildings they are putting up all over the City right now. These Builders need to start putting a percentage of affordable units in EVERY building they are currently putting up. No exceptions and no more fees to get out of supplying this now. Seattle land is expensive and will only continue to get more so since we are land-locked. Seattle Gov't won't be able to buy any land with whatever fees they are collecting (and hopefully banking) on which to build affordable housing and still have enough left over to build quality, long lasting affordable housing. Also, the City of Seattle is NOT a Construction Company nor will they be able to build affordable housing as efficiently and economically as qualified Construction Companies can.
- 5) I live in a designated "steep slope area" that is also environmentally sensitive (Salmon runs). Increasing density without accompanying improvements to infrastructure is a recipe for disaster. Everything rolls downhill.....literally!
- 6) I would like our incoming Mayor Durkin and her team to reevaluate all existing housing proposals before the existing Seattle City Council does anything further.
- 7) Stop vilifying Single Family Residences and neighborhoods in Seattle. We have certainly paid enough property Taxes to have gotten a reasonable start on many housing issues facing our City. Utilize existing revenue sources appropriately and transparently. Goal and results driven.
- 8) The Seattle City Council needs to conduct Town Halls in each of the Districts during the Evening Hours when District residents can attend. Interactions within the City Districts with the District residents might bring new insights and ideas to the City Council. Face-to-face is always better than email or voicemail feedback.

Thanks,  
Patti Wickham

## ADUEIS

---

**From:** Mariel Bailey <marielb@outlook.com>  
**Sent:** Monday, November 13, 2017 2:52 PM  
**To:** ADUEIS  
**Subject:** No ADUs or DADUs

Dear Honorable Mayor and Seattle City Council, et al.

Please do not allow ADUs or DADUs anywhere in the Seattle metropolitan area. The region is overcrowded now, with neighborhoods being destroyed and gridlock on the streets. Please retain the 10 foot between houses rule. Also, please restrict the height of new buildings to two stories above ground. Please no apartment complexes in residential neighborhoods.

I will be watching how you vote on this issue, and will vote against anyone who supports the ruination of Seattle.

Our current home's value has been damaged by a large new home next door as well as part of our view. Stop this attempt to ruin our homes!

Mariel Bailey  
98119

Sent from [Mail](#) for Windows 10

## ADUEIS

---

**From:** Joseph Beauregard <fjbeauregard@gmail.com>  
**Sent:** Monday, November 13, 2017 3:43 PM  
**To:** ADUEIS  
**Cc:** Herbold, Lisa; O'Brien, Mike; Harris-Talley, Kirsten; Sawant, Kshama; Bagshaw, Sally; Johnson, Rob; Gonzalez, Lorena; Harrell, Bruce; Juarez, Debora; Burgess, Tim; Brier Dudley; Sea Physicist; info@jennyforseattle.com  
**Subject:** Backyard Cottage Comments

I just want to be on record as being 100% in agreement with the comments submitted by the Queen Anne Community Council on November 12.

Joe Beauregard

**ADUEIS**

---

**From:** Paul Urla <sydneydreaming@comcast.net>  
**Sent:** Monday, November 13, 2017 4:21 PM  
**To:** Morgan Gold  
**Cc:** Kaplan, Martin; Pennucci, Aly; ADUEIS; LEG\_CouncilMembers; M Pamela Piering; Anne Preston; battle.john@comcast.net; Bob Bean; Bruce Faaland; Carolyn White; Don Hopps; Jon Rosen; Rick Hooper; Fumi Janssen; Gayle Walters; Greg Richter; Jackie Borges; jannank@hotmail.com; John Creighton; Kathleen Conroy; Kim Lukens; Lea Sund; Mani Krishnamurthy; Marcus Kauffman; Maria Beck; Nancy Silberg; Sean; Tanya Khodr; TheJkh007.; Thomas Vaughan; Tracy Adams; Jeff Lubetkin; Sam Chen; Susan Lubetkin; Patricia Marshall; harishnanda@hotmail.com; jamesblackmore@live.com; samchen00@hotmail.com; Carmen Barr; Jeff Barr; Karen Schmidt; Carla Reinke; Jason Mattera; Donald Kunz; Robb Miller; Brendan Hopps; hjleverson@gmail.com; Power Lisa; Campbell Matt; lakealoha@q.com; rfpcola77@gmail.com; tomva@wavepacket.net; lubetkin@u.washington.edu  
**Subject:** Re: Seattle Single Family Up-zone - Critical Update!!

Morgan,

How do you know what the majority of Queen Anne residents think about this issue? I think the City's position on this is indefensible, primarily because it eliminates the owner occupancy requirement. And their attempt to shove this thru without any analysis of its impact is reprehensible Trump-style politics.

Sent from my iPhone

> On 13 Nov 2017, at 13:22, Morgan Gold <morgangold13@yahoo.com> wrote:

>

> Marty,

> Why are you suggesting 10K lots and above? Could it be that your property would qualify and very few others would? This does not reflect the wishes of the majority of Queen Anne residents.

>

> <http://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?Parce>

> INbr=3025049050

>

> MG

> PS: Was your property tax appeal successful?

>

>

> From: Martin Henry Kaplan <mhk@martinhenrykaplan.com>

> To:

> Sent: Monday, November 13, 2017 9:55 AM

> Subject: Seattle Single Family Up-zone - Critical Update!!

>

>

>

>

>

>

>

>  
> #yiv9359541288 --  
>  
> filtered {panose-1:2 4 5 3 5 4 6 3 2 4;}  
> #yiv9359541288 filtered {font-family:Calibri;panose-1:2 15 5 2 2 2 4 3 2 4;}  
> #yiv9359541288 filtered {panose-1:2 11 4 3 2 2 2 2 2 4;}  
> #yiv9359541288 filtered {}  
> #yiv9359541288  
> p.yiv9359541288MsoNormal, #yiv9359541288 li.yiv9359541288MsoNormal, #yiv9359541288  
div.yiv9359541288MsoNormal  
> {margin:0in;margin-bottom:.0001pt;font-size:11.0pt;}  
> #yiv9359541288 a:link, #yiv9359541288 span.yiv9359541288MsoHyperlink  
> {color:blue;text-decoration:underline;}  
> #yiv9359541288 a:visited, #yiv9359541288 span.yiv9359541288MsoHyperlinkFollowed  
> {color:purple;text-decoration:underline;}  
> #yiv9359541288 p.yiv9359541288MsoNoSpacing, #yiv9359541288 li.yiv9359541288MsoNoSpacing,  
#yiv9359541288 div.yiv9359541288MsoNoSpacing  
> {margin:0in;margin-bottom:.0001pt;font-size:11.0pt;}  
> #yiv9359541288 p.yiv9359541288msonormal0, #yiv9359541288 li.yiv9359541288msonormal0, #yiv9359541288  
div.yiv9359541288msonormal0  
> {margin-right:0in;margin-left:0in;font-size:12.0pt;}  
> #yiv9359541288 span.yiv9359541288EmailStyle19  
> {color:windowtext;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle20  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle21  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle22  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle23  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle24  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 span.yiv9359541288EmailStyle25  
> {color:#404040;font-weight:normal;font-style:normal;text-decoration:none;text-decoration:none;}  
> #yiv9359541288 .yiv9359541288MsoChpDefault  
> {font-size:10.0pt;}  
> #yiv9359541288 filtered {margin:1.0in 1.0in 1.0in 1.0in;}  
> #yiv9359541288 div.yiv9359541288WordSection1  
> {}  
> #yiv9359541288  
>  
>  
>  
> Queen  
> Anne Community Council  
>  
> Land Use Review Committee  
>  
> Planning Committee

- > ■
- >
- >
- >
- > Good Morning City-Wide Neighbors;
- >
- > Please find attached our ADU-EIS Scoping Comments addressed and
- > delivered to the City pursuant to the extension of the comment period until November 16th, 2017.
- > Please remember that this is your chance to weigh in on Councilmember
- > O'Brien's proposal to convert every single-family neighborhood to multi-family, allowing each single-family lot to
- > contain three residences, with no ownership or parking requirements, and allowing for 12 unrelated people to reside on
- > every single property among many other significant changes.
- >
- > Please be sure to submit your Scoping Comments and concerns regarding
- > the Backyard Cottage proposal by November 16th 2017 as outlined within
- > their website:
- >
- > <https://www.seattle.gov/council/adu-eis>
- >
- > You can submit your concerns by using their online form or write your own comment letter and email to:
- > ADUEIS@seattle.gov
- >
- > As always, thanks for your participation in helping define the scope of the Environmental Impact analysis (EIS).
- >
- > Queen Anne Community Council
- > Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair
- >
- >
- >
- >
- > Our letter addressed the following in addition to the formal Scoping
- > Comment email address:
- > ADUEIS@seattle.gov
- >
- >
- >
- > 12 November 2017
- >
- > Aly Pennucci, Council Central Staff
- > Nick Walsh, Planner OCPD
- > Ketil Freeman, Council Central Staff
- > Mayor Tim Burgess
- > Councilmember Mike O'Brien
- > Councilmember Rob Johnson
- > Councilmember Lisa Herbold
- > Councilmember Lorena Gonzales
- > Councilmember Sally Bagshaw
- >
- > Re:
- > Scoping Comments pertaining to the ADU-EIS
- >

> Dear Aly, Nick, et al:

>

> On behalf of the Queen Anne Community Council (QACC) and our QACC Land

> Use Review and Planning Committee (LURC), we thank you in advance for considering our attached Scoping Comment letter pertaining to the ADU-EIS.

>

>

> Respectfully Submitted,

>

>

> Queen Anne Community Council

> Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair

>

>

>

>

>

>

## ADUEIS

---

**From:** David Herrera <davidhullherrera@gmail.com>  
**Sent:** Monday, November 13, 2017 7:39 PM  
**To:** ADUEIS  
**Subject:** Your feedback website is down...

...and the proposal is bad. You'll increase the cost of single family housing because now everyone is going to be competing with developers with cash offers.

**ADUEIS**

---

**From:** elaine h <ehsu5865@gmail.com>  
**Sent:** Monday, November 13, 2017 8:11 PM  
**To:** ADUEIS  
**Subject:** Proposed EIS scope

To the City of Seattle:

With Seattle undergoing record growth and economic potential, it would be in the interests of all to be thoughtful and proactive.

Land Use:

By decreasing requirements for minimum lot size, increasing AADU and DADU square footage, increasing the rear yard percentage, green space is decreased. Green space is not only important for visual aesthetics but for green storm water infrastructure. Seattle has issues with storm sewer overflow which green storm water infrastructure can minimize.

Transportation:

The parking requirement for one off street parking space should remain. Under current circumstances, street parking is challenging. Eliminating the parking requirement will make street parking onerous. It will not benefit residents or small businesses.

Mass transit is not adequate for the current communities and therefore would not support an increase in riders.

Public services:

Increasing the household size from 8-12 would overburden the public services.

In my neighborhood, currently there have been many approved and in progress multiunit buildings. How are all the city public services handling the increase? Locally there have been a significant increase in thefts and burglaries without an increase in Police presence.

Owner personal investment in neighborhood quality:

Present AADU and DADU requirements mandate the home owner live on property at least six months a year. This encourages homeowner attentiveness to the property occupant's site issues, encourages homeowner commitment to the neighborhood, and homeowner oversight of their property. Removing the residency requirement encourages property speculation, encourages distant landowners with little or no neighborhood commitment, and need for increased regulatory burden on the city.

In the rush to solve one problem, please do not create a cascade of unintended consequences.

Respectfully,

Elaine Hsu

**ADUEIS**

---

**From:** Isabel Stusser <isabels@comcast.net>  
**Sent:** Monday, November 13, 2017 8:43 PM  
**To:** ADUEIS  
**Subject:** housing density

We are residents in the Queen Anne neighborhood. We have real objections to adding small residences on property that is zoned for single family residences. We agree that some neighborhoods would be all right with this change in zoning, Those near rapid transit stations could handle this kind of change. Part of the charm of SEattle is the homes with space for yards and landscaping, adding to the enjoyment of beauty and quiet. We think adding to the density in these areas will be detrimental to the livability and quality of life for those affected by the changes. We feel that this zoning change is not the way to go about our housing problems and that more study must be done. There are other ways to achieve a growth in housing, without spoiling are lovely city neighborhoods.

Thank you for your consideration.

Isabel and Herb Stusser

**ADUEIS**

---

**From:** Martin Henry Kaplan <mhk@martinhenrykaplan.com>  
**Sent:** Monday, November 13, 2017 10:20 PM  
**To:** Morgan Gold; Pennucci, Aly; ADUEIS; LEG\_CouncilMembers  
**Cc:** M Pamela Piering; Anne Preston; battle.john@comcast.net; Bob Bean; Bruce Faaland; Carolyn White; Don Hopps; Jon Rosen; Paul Urla; Rick Hooper; Fumi Janssen; Gayle Walters; Greg Richter; Jackie Borges; jannank@hotmail.com; John Creighton; Kathleen Conroy; Kim Lukens; Lea Sund; Mani Krishnamurthy; Marcus Kauffman; Maria Beck; Nancy Silberg; Sean; Tanya Khodr; TheJkh007.; Thomas Vaughan; Tracy Adams; katrin.mucke@t-online.de; Jeff Lubetkin; Sam Chen; Susan Lubetkin; Patricia Marshall; harishnanda@hotmail.com; jamesblackmore@live.com; phogenson@phogenson.net; samchen00@hotmail.com; Carmen Barr; Jeff Barr; Karen Schmidt; Carla Reinke; Jason Mattera; Donald Kunz; Robb Miller; Brendan Hopps; hjleverson@gmail.com; Power Lisa; Campbell Matt; lakealoha@q.com; rfpcola77@gmail.com; tomva@wavepacket.net; lubetkin@u.washington.edu  
**Subject:** ADU-EIS Morgan Gold's email

*(apologies for broad distribution – I felt it was necessary to follow Mr. Gold's distribution list)*

**Dear Mr. Gold;**

Please know Mr. Gold that for most of my career I have actively and transparently engaged in a wide variety of neighborhood and City-wide issues, committed always to thoughtful, inclusionary, and respectful dialogue. The discussion of accommodating increases in density is important and many have differing viewpoints and opinions as to thoughtful solutions.

My first response to your email was to ignore it, to let it rest in ignorance and disrespect. On second thought this evening, I decided that people like you should not get away with provocative and thoughtless attacks.

Rather than address your insincere concerns head on, you lower yourself to indirect innuendo and insinuation. The fact that you would copy city officials and so many others, in addition to actually attaching a link to my personal property records, only magnifies your ignorant and intentional disregard for facts, personal privacy, and what was actually written and presented in the comment letter.

The obvious reason for the 10K sq ft lot size is to simply preserve the quality and livability of every neighborhood for residents of lots less than 10K sq ft, which represent by far the majority of lots in all Seattle. If you actually read our letter and really cared about contributing thoughtfully to the conversation, you would realize that without any doubt, my alternative considering 10K lots excludes all lots like ours.

I trust you found my property tax appeal illuminating.  
 Martin Kaplan

---

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

**From:** Morgan Gold [mailto:morgangold13@yahoo.com]  
**Sent:** Monday, November 13, 2017 1:22 PM

Marty,

Why are you suggesting 10K lots and above? Could it be that your property would qualify and very few others would? This does not reflect the wishes of the majority of Queen Anne residents.

<http://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?ParcelNbr=3025049050>

MG

PS: Was your property tax appeal successful?



Martin Henry Kaplan, Architects AIA

Seattle Office

360 Highland Drive, Seattle WA 98109

T.206.682.8600 F.206.284.4400

Sun Valley Idaho Office

251 Hillside Drive, PO 482, Ketchum, ID 83340

T.208.725.0014 F.208.725.0014

[www.MartinHenryKaplan.com](http://www.MartinHenryKaplan.com)

Notice: Privileged and confidential communication. If you are not the addressee, you may not read, copy, or distribute this email. If you receive this email in error, please advise us immediately by return email and delete it from your system. Thank you.

**ADUEIS**

---

**From:** nancy edelstein <edelstein.nancy@gmail.com>  
**Sent:** Tuesday, November 14, 2017 7:48 AM  
**To:** ADUEIS  
**Subject:** comment on proposed EIS scope

I am a resident of Seattle and in general understand the need for increased affordable housing in our city, but am deeply upset by the proposed plan to allow ADUs everywhere, without regard to preserving the qualities of our unique neighborhoods. For 22 years I lived on Capitol Hill in a home in the Historic Landmark District, and at that time, protecting the historic integrity of the neighborhood was a requirement. What happened to this value? While it was restrictive, it honored the past with an understanding that, once gone, it would be a permanent loss to our community. This new plan seems to abandon any respect for preserving our special Seattle neighborhoods, and is a furious path to squeezing as many sardines into as many can's as possible in an attempt to solve a problem without looking deeply at the impact and value on our existing communities and the nature of our city. This plan is a developer's dream, and a thoughtful resident Seattle lover's huge loss!

I currently live on the top of Queen Anne and a half block away, for the past year, one such anomaly has been loudly being built, shoehorned in between a one family historic home and an established condominium building which is now being dwarfed and shaded by this new, awkward structure. It is a prime example of what the freedom to take full advantage of looser codes allows: a zone change in the middle of this property results in a new lopsided building with an extra floor on one side and a narrow walkway right next to the neighbors fence for an entrance to one more tiny unit squeezed into the back. Luckily, in this case, there is underground parking, but it sits up higher and stands out with no respect to the aesthetic of the existing neighborhood. Why is this now being highly sanctioned? I can see more higher density buildings built on higher traffic streets and corners, but to take down homes in the middle of blocks in established single family neighborhoods all around the city to sprinkle these over packed, out of place towers everywhere does nothing for the preservation or betterment of our city. This isn't thoughtful progress, it's a sloppy knee jerk reaction with a quick fix to a problem, leading to so many more!

Of course, with the freedom to build structures with no parking, and the addition of 9 individuals potentially with cars added to the neighborhood with each one, the impossibility of an already existing parking problem is guaranteed for any guest wanting to come my way. I already have family members who refuse to visit because parking is next to impossible! I myself no longer go to Capitol Hill because of this problem. It's just not worth it. I do take public transit, but as an elderly single woman, I don't feel comfortable traveling this way at night.

Bottom line: There needs to be protection for single-family neighborhoods and homeowners in this plan! This proposal is a sad reveal of lack of respect for existing neighborhoods and us Seattleites who have lived here and have created a city worth fighting for. Please do not adopt this plan as it is...I think we can do much better, even if it takes a bit more time!

Thank you,  
Nancy Edelstein

## ADUEIS

---

**From:** leannarich@comcast.net  
**Sent:** Tuesday, November 14, 2017 8:47 AM  
**To:** ADUEIS  
**Subject:** Over building

Hello, I believe maximizing the zoning laws to provide additional dwelling unites on city lots under the present plan will be overcrowding. The council should consider the new law that the city of Mercer Island just passed effective December 1, 2017. No more Accessory Housing Unites will be given permits.

Leanna Anderson  
308 West Kinnear Place  
Seattle Wa. 98119  
leannarich@comcast.net

**ADUEIS**

---

**From:** Diane Isonaka <DRISONAKA@msn.com>  
**Sent:** Tuesday, November 14, 2017 9:45 AM  
**To:** ADUEIS  
**Subject:** ADU-EIS

To Whom It May Concern:

My spouse, David Galas, and I are long-time residents of Queen Anne. We were quite distressed to learn about possible land use changes affecting every single-family neighborhood in the city. With this in mind, we strongly support the 12 November 2017 letter (scoping comments pertaining to the ADU-EIS) that was sent by the Queen Anne Community Council (QACC) and the QACC Land Use Review and Planning Committee (LURC).

We have experienced the many changes in our city over the last 10 years--and while progress is welcomed, some of the changes have had very negative consequences for those of us who live in the city. We believe that the QACC comments contain reasonable alternative options.

Diane Isonaka

[drisonaka@msn.com](mailto:drisonaka@msn.com)

**ADUEIS**

---

**From:** Tyler Caruso <tylercaruso@hotmail.com>  
**Sent:** Tuesday, November 14, 2017 10:16 AM  
**To:** ADUEIS  
**Subject:** There Goes the Neighborhood

Your plan to allow multiple ADU's on single family lots in single family zoned neighborhoods is a case of an unlawful land grab by the City of Seattle that has no regard or respect for the hard working middle class who have lived here for 40 plus years. We property owners who have spent our hard earned money to improve our homes for the purpose of having a nice place to live out our retirements are already being taxed out of the county, being told to sell your cars and ride the bus because you won't have any place to park your car anyway, and are now being told the City wants to jam another two families on your single family lot, are getting fed up with this assault on our lives.

Our neighborhoods are what they currently are because that is what we as neighbors want them to be. We don't need increased density. I have serious doubts as to whether the current infrastructure can support the density that you are proposing.

I can only think that the City's goal in trying to shove this down our throats is to drive out all the home owners. If this is your plan for making Seattle more affordable, you are gravely mistaken. You are going about this with a blind eye to those who have supported this city and built this city for the past 40+ years.

Stop this ADU plan and let us go on with our lives in our neighborhoods just as they are today.

Tyler Caruso  
Resident/Homeowner on Queen Anne since 1970

**ADUEIS**

---

**From:** Taylor, Mark <MLTAYLOR@seattleu.edu>  
**Sent:** Tuesday, November 14, 2017 1:06 PM  
**To:** ADUEIS  
**Cc:** Sequeira, Debra  
**Subject:** Accessory Dwelling Units Environmental Impact

Dear Seattle City Government:

My wife, Dr. Debra Sequeira, and I have lived on Queen Anne in a single-family home at 2112 4<sup>th</sup> Avenue West (the block between W. McGraw and W. Crockett) since 2002 – after having lived in a multi-family condo building a 1015 West Nickerson (also Queen Anne, but right at the Ballard Bridge). We have been deeply concerned that proposed changes to land use codes will cause irreparable harm to the quality of life in single family neighbors like ours. We are grateful for the careful work done by the Land Use Review and Planning Committee of the Queen Anne Community Council and would urge you to follow its Alternative 3s instead of the proposed changes by the city (see the QACC Letter of November 12, 2017). We believe that infrastructure in our old neighborhood (utilities, parking, access, etc.) is simply inadequate to accommodate so many new structures, residents, and automobiles. Please do not destroy the neighborhood into which my wife and I have poured most of our life earnings and whose quality of life attracted us in the first place 15 years ago.

Thanks you,

Mark Taylor and Debra Sequeira

**Mark Lloyd Taylor, Ph.D.**

Professor

**SCHOOL OF THEOLOGY AND MINISTRY | SEATTLE UNIVERSITY**

901 12th Avenue, Seattle WA 98122-1090

Direct (206) 296-5633 | [seattleu.edu/stm](http://seattleu.edu/stm)

**ADUEIS**

---

**From:** Peggy Sturdivant <peggysturdivant@gmail.com>  
**Sent:** Tuesday, November 14, 2017 1:49 PM  
**To:** ADUEIS  
**Subject:** Public Comment on ADU EIS

I have attended community information meetings and have the following comments. I think it's crucial that the EIS address loss of tree canopy by allowing more dwelling units on smaller lot sizes. The City has a Tree Canopy goal (which is not being met) and a Climate Action Plan that should be taken into consideration for environmental impacts. I have read that the healthiest trees are not street trees but rather than in yards. Also my part of the city suffers from sewer overflow concerns such that Seattle Public Utilities encourages a Rainwise Program. What is the point of increasing hardscape when another department is desperately trying to reduce it in order to reduce storm water overflow. Last year the County's treatment plant failure is an indicator that infrastructure is not able to keep pace with development. I hope the EIS will look at ways that sustainability can be increased and not decreased by the ADUs. I

Margaret Sturdivant  
6412 34th Avenue NW  
Seattle, WA

**ADUEIS**

---

**From:** Frank Firmani <frank@firmanillc.com>  
**Sent:** Tuesday, November 14, 2017 7:07 PM  
**To:** ADUEIS  
**Subject:** ADU-EIS Scoping comments

I am shocked that a land use proposal as large and comprehensive as this has been put forward without vigorous and open discussion among Seattle citizens. This process smacks of Soviet style central planning done in the shadowy offices of some apparatchik. Where is the public discussion that should be part of the decision making process? This proposal would be the largest land use change ever in Seattle. So far It seems like a sneaky railroading with a predetermined outcome.

I strongly support the alternative #3 proposals defined by the Queen Anne Community Council. I even more strongly, advocate for a vigorous, honest civic debate on all of the alternatives. As a developer, I am cognizant of land use regulations and proposed changes to existing land use regulations. To my surprise, this massive proposal has been slipped through to near approval without appropriate public comment. Let's open this process up to the light of day.

Respectfully submitted,

*Frank Firmani*

**ADUEIS**

---

**From:** Hogan, Donn <Donn.Hogan@hdrinc.com>  
**Sent:** Tuesday, November 14, 2017 8:41 PM  
**To:** ADUEIS  
**Subject:** ADU Commentary

Regarding the ADU EIS, Alternate 1 (No action) is the right answer. Alternative 2 will cause more disruption to existing residential neighborhoods by increasing on-street parking demand, causing a loss of trees, overbuilding residential properties, encouraging real estate speculation that will have the counter effect of increasing housing costs, etc. The City of Seattle needs to focus on creating substantial and affordable housing that supports constructive urban design. We cannot rely on an ad hoc process to solve a greater civic problem of housing and affordability. We need to create community, not disrupt it. Yes, density needs to be increased but it needs to be done right, not left to chance.

**Donn Hogan**, Architect  
1629 Queen Anne Avenue N, #301  
Seattle, WA 98109  
206.794.1897  
donn.hogan@hdrinc.com

**ADUEIS**

---

**From:** Michael Jones <mpdjones@yahoo.com>  
**Sent:** Tuesday, November 14, 2017 10:33 PM  
**To:** ADUEIS  
**Subject:** EIS for ADU Proposed Program

In response to "The City of Seattle is asking for ideas on what should be included in the environmental analysis (EIS) for the Accessory Dwelling Units (ADU) program.", the issues related to traffic and parking in this areas should be solved BEFORE the City embarks on adding massive more numbers of dwellings such as ADUs.

Right now the City has not addressed the growing traffic and parking issues in Seattle. As best as I can tell, the City is hoping people will not have cars and simply take the bus or bike to where ever they need to go. This is not even close to realistic. People's transit needs are greater and more divers than a bus system with minimal light rail can support. In addition to that that we have limited land for expanding our transit areas and are bounded by many water ways. Adding more people to this mix will only exacerbate a poor transportation infrastructure that is already woefully inadequate.

Trying to add ADUs along with upzoning and adding more living units when the area's traffic/parking issues have not been solved amounts to malfeasance of duty on the City's part in regard to public policy, transportation and population density.

I have attended several public meetings regarding proposed buildings in my neighborhood. I've commented on proposed changes to roadways in the area. None of my or anyone else's comments from the public have been seriously considered by the City. I assume that these comments I'm providing will also not be seriously considered. The City appears to be only taking public comment for show and is not genuinely interested in citizen's opinions. The City's plans already seem to be set and there does not seem to be anything that will prevent them from happening.

My conclusion is that the City is more interested in helping developers and businesses than maintaining the quality of life for long term citizens such as myself that have helped to make this City what it has become over the past several decades.

In summary, before ADUs and upzoning are even considered, the EIS should start with addressing and solving the City's traffic and parking issues. And hoping that people will give up their cars is short sighted and misguided strategy.

Michael Jones

## ADUEIS

---

**From:** Carl Oest-Larsen <oestlarsen@yahoo.com>  
**Sent:** Wednesday, November 15, 2017 6:55 AM  
**To:** ADUEIS  
**Subject:** ADUs

To whom it may concern,  
Please find this note as formal concern with moving forward with ADU zoning changes for Seattle, specifically Queen Anne.  
With current growth, our neighborhoods are bursting at the seams with cars, traffic and congestion.  
Sincerely,  
Carl Christian Oest-Larsen  
302 Howe St  
Seattle, WA 98109

Sent from my iPhone

**ADUEIS**

---

**From:** gwrhcr@gmail.com on behalf of Georganne and Harold Robertson <gwrhcr@msn.com>  
**Sent:** Wednesday, November 15, 2017 9:10 AM  
**To:** ADUEIS  
**Subject:** Comments and Recommended Revisions

I am the owner and occupant of a condominium at 110 W. Highland Drive, #311. My wife and I have lived here 17 years. Previously, we lived at 4th W and W McGraw for 14 years. We participate with and donate to various organizations providing services to homeless and low income people. My career has been primarily in public sector planning, including the issues pending here. I support well considered increases in housing choices and density.

However, I believe changes are needed in the current proposals. I strongly endorse and recommend to you the 11/12/2017 submittal by Martin Kaplan, architect and member of the Queen Anne Community Council, particularly his "concerns" and his recommendations listed under each point as "alternative 3".

Sincerely,

Harold Robertson

## ADUEIS

---

**From:** Douglas McKenna <ddouglasmckenna@gmail.com>  
**Sent:** Wednesday, November 15, 2017 9:44 AM  
**To:** ADUEIS  
**Cc:** A1wifeandlover McKenna; ddouglasmckenna@gmail.com McKenna  
**Subject:** QACC Scoping Comments pertaining to the ADU-EIS

Dear Sirs and Madames,

I have thoroughly reviewed the comments in the attached document from the QACC. I have been a resident of Queen Anne since 1968. I graduated from Queen Anne High School and Seattle Pacific University. My wife and I currently own a single family home on the south slope and a condominium in the Victoria Apartments. This is our home.

I enthusiastically support ALL the proposals and their rationales put forth by the council. The quality and livability of our neighborhood and others across the city is at stake.

Please give due consideration to these comments and follow their guidance as you make decisions on scoping.

Thank you,

D. Douglas McKenna, Ph.D.  
206.335.2809

Douglas McKenna, Ph.D.  
The Oceanside Institute  
Seattle, WA.  
Greenbank, WA

## ADUEIS

---

**From:** Luka Ukrainczyk <lukrainczyk@gmail.com>  
**Sent:** Wednesday, November 15, 2017 10:45 AM  
**To:** ADUEIS  
**Subject:** ADU/Backyard Cottage Environmental Impact Statement

Hi,

Please consider the following in you EIS:

- The impact of *not* implementing this legislation will have on sprawl in Washington open spaces.
- The impact *not* implementing this legislation will have on housing affordability in Seattle.
- The holistic impact of onerous parking requirements have on car dependence, car ownership, and greenhouse gases.
- The impact that retaining the majority of city residential land for single family zoning has on affordability and car-dependence.
- The beneficial impacts of density of greenhouse gas emissions.
- Finally, parking in and of itself is not a valid environmental impact. Hard to find parking is a minor inconvenience, not a health concern nor planetary hazard. Any emissions from vehicles trying to find parking should be weighed against the emissions that easy, cheap, and plentiful parking has on increased car-ownership, increased VMT and resulting emissions.

Thank you,

--

Luka Ukrainczyk  
2413 Boylston Ave E, Seattle 98102  
Email: [Lukrainczyk@gmail.com](mailto:Lukrainczyk@gmail.com)  
Telephone: (650) 575-2271

## ADUEIS

---

**From:** Chrys Kim <chrys@chrystinekim.com>  
**Sent:** Wednesday, November 15, 2017 1:18 PM  
**To:** ADUEIS  
**Cc:** Welch, Nicolas  
**Subject:** Re: Please approve all Alt 2 and one step beyond

Hello!

Thanks to the city, for all your hard work.

Remaining hopeful.

Chrystine Kim  
 NEST Architecture & Design  
[206.850.1572](tel:206.850.1572)

Full steam ahead Alternative 2 and beyond. We need more housing so Seattle stays a mix of generations, incomes, races. It will be much less boring.

Specific code suggestions:

1. Ease zoning envelope & location rules: Location of: existing small house in front becomes the DADU with larger house (30'/35' height) in back when SF rearyard abuts NC. This type of flexibility is to address privacy for both DADU owner, and the adjacent neighbors. Flexibility is critical for design of privacy, and seems to be one of the biggest issue with the "no" camp, including my street on N. 84th in Greenwood. Allow height flex for built privacy structures/screens, similar to fence height guidelines (not just plants).
2. When adding above Garage, ease 5' side setback, as most garages are 0' to 3' away from property line. Having to shift 5' creates a small area that needs to be roofed. Allow to go straight up as long as enough width between Garage wall and structure on side of neighbor property.
- 3.If removal of parking become issue with another round of pushback, allow parking spots in front/side/rear setbacks.

Wider perspective from Portland seminar and beyond:

1. Education of general public on financial benefit/flexibility of & helping ease displacement of POC, elderly , Asian intergenerational structure (which still exists - moms want to stay in their neighborhood with people and neighborhood they know, not move (Wedgewood, Greenwood, Seward, Hillman, Beacon).
2. Cost. Initially ease costs/help owners build/financial incentives possibly for single parents/retirees/limited income group. From Harriet Tregoning - "using people who have equity in their home to build more housing" and "use of building more (adus/dadus) for disaster relief/displacement during, but after that, it increases the amount of housing supply". Other cities: Look to CA & Portland, DC how they reduced cost. Even people with most of the cash on hand are having a hard time deciding to build. Homeowners are the best bet in increasing low impact housing all around Seattle SF zones, one step up from Favellas!
3. Study & present postive impact on single family zones if allowed traditional residential uses (duplex, triplex, cottage clusters, corner stores, which used to be legal. Friends and neighbors with kids living in SF neighborhoods WISH these came back.
4. Get the positive word out: use of local media & organizations as part of educating, on the positive impact of change, a coalition similar to Portland.
5. Laws: Make changes at state level to build ADUs as a right, like California. Met many people outside of Seattle (Edmunds, Kirkland, Bellevue, Bothell) all close to retirement who wanted to build but neighbors objected.

On Tue, Oct 17, 2017 at 2:31 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Hi Chrystine,

Thank you for your comment. All comments will be considered at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Chrys Kim [mailto:[chrys@chrystinekim.com](mailto:chrys@chrystinekim.com)]

**Sent:** Tuesday, October 17, 2017 2:05 PM

**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>

**Cc:** Brand, Jesseca <[Jesseca.Brand@seattle.gov](mailto:Jesseca.Brand@seattle.gov)>; Welch, Nicolas <[Nicolas.Welch@seattle.gov](mailto:Nicolas.Welch@seattle.gov)>

**Subject:** Please approve all Alt 2 and one step beyond

Hello,

Thanks for the opportunity to comment on DADU/EIS and related issues of up zoning and growth.

Chrystine Kim  
NEST Architecture & Design

**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Wednesday, November 15, 2017 1:34 PM  
**To:** kkosl@yahoo.com  
**Cc:** ADUEIS  
**Subject:** FW: Seattle Single Family neighborhood zoning

Good afternoon Kathy and Jeff Lindenbaum,

I have forwarded your message to the comment location for Scoping for ADU/DADU.

All the best,

**Spencer Williams, AICP, Assoc. AIA**  
 Legislative Assistant to Councilmember Johnson-District 4  
 E: [Spencer.Williams@Seattle.Gov](mailto:Spencer.Williams@Seattle.Gov)  
 O: (206) 684-8168  
 C: (206) 384-2709

[Click Here to Sign Up for Rob's Newsletter](#)




---

**From:** Kathleen Lindenbaum [mailto:kkosl@yahoo.com]  
**Sent:** Monday, October 30, 2017 4:56 PM  
**To:** Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; Herbold, Lisa <Lisa.Herbold@seattle.gov>; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>; Johnson, Rob <Rob.Johnson@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; Harris-Talley, Kirsten <Kirsten.HarrisTalley@seattle.gov>  
**Cc:** dwestneat@seattletimes.com  
**Subject:** Seattle Single Family neighborhood zoning

First - thank you all for your service to the city by working in city government as members of our Seattle City Council.

My husband and I, residents of Seattle since 1973, would like to speak against moving ahead with the *current* rezoning proposal - to allow multi-family development of three residences on every property over 3,200 sq. ft. There are many reasons this particular

proposal, in its current sweeping iteration, is not in the best interests of the current and future citizens of Seattle, and I will list a few below.

But, first I'd like to recommend a process that's been previously used in the city during our time as residents here: start with "grandfathering anew" and document all the 'single' family lots that have been added to, with one or more additional structures (including currently-allowable attached or detached dwellings). That inventory has grown exponentially over the last few years and the information is critical to understanding the scope of the issue.

In addition, **in 2015**, Danny Westneat, copied here, wrote a column about single family zoning research that included this information -

"But the city also did a [recent survey of developable land](#) in Seattle and found there's enough capacity under current zoning to add 224,000 housing units — 73 percent more than the current stock of 308,000."

Couple that with documenting and recognizing the 'grandfathered' properties, and you have a direction to take that's forward-thinking and doesn't immediately impact all Seattle single family lots at one time. Rezoning virtually all single family lots in the city - without addressing already-known hazards and major negative impacts - is not a responsible course of action.

Road congestion and more risk to children, pedestrians, and bicyclists with increased traffic, and NO mass transit/transportation solutions planned or on the horizon - is a recipe for creating more severe congestion and housing problems.

Most new buildings in Seattle are not requiring individual parking for the number of apartments and condos being built. That is a partial strategy for decreasing car ownership, but not at all a guarantee that people will use alternate transportation, when they do not have viable mass transit to get to work. Cars will circle for parking, creating more pollution, and the city will have to expand and manage parking for many more, perhaps most, neighborhoods in the city.

Loss of diversity of housing choices - loss of trees/green areas/light corridors, increased pollution - without mitigation is not a housing solution. It creates more overall environment and 'quality-of-life' problems.

We are not resistant to growth in Seattle, and growth in our own neighborhood. If we were, we would have moved out years ago as Seattle has grown and expanded. We have options to live here or not. And, as long-time Seattle residents, who do choose to live here, we want "growth with a plan". We want to assure that our property tax dollars are working in a way that creates infrastructure simultaneously (or preferably) before sweeping changes are made, not after.

There is no silver bullet in this complex issue - and the proposed, across-the-board, single family lot rezone is not a targeted or strategic solution.

Thank you.  
Kathy and Jeff Lindenbaum  
[kkosl@yahoo.com](mailto:kkosl@yahoo.com)

**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Wednesday, November 15, 2017 1:36 PM  
**To:** Austin Valeske  
**Cc:** ADUEIS  
**Subject:** RE: Additional Comments on DADU EIS

Please see attached comments.

**From:** Austin Valeske [mailto:avaleske@gmail.com]  
**Sent:** Tuesday, October 24, 2017 1:18 AM  
**To:** O'Brien, Mike <Mike.O'Brien@seattle.gov>  
**Subject:** Additional Comments on DADU EIS

Council members,

I'm submitting this as a comment on the DADU EIS, but I wanted to submit it to you as well, as you're on the planning and zoning committee.

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

**Do you have other comments or suggestions related to the scope of the EIS?**

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing

non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Thank you,  
Austin Valeske

**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Wednesday, November 15, 2017 1:37 PM  
**To:** Christopher Fast; Johnson, Rob  
**Cc:** ADUEIS  
**Subject:** RE: AADU/DADU zoning changes

Please see message below:

---

**From:** Christopher Fast [mailto:cfast@reedlongyearlaw.com]  
**Sent:** Monday, October 23, 2017 2:05 PM  
**To:** Johnson, Rob <Rob.Johnson@seattle.gov>  
**Subject:** AADU/DADU zoning changes

Dear Councilman Johnson,

I am writing to express my support for “Alternative 2” of the ADU-CIS (Accessory Dwelling Unit EIS - <http://www.seattle.gov/Documents/Departments/Council/ADU-EIS-Scoping-Handout.pdf> )

Our lot in the increasingly unaffordable Bryant neighborhood is only 2,700 square feet, so zoning changes allowing for the construction of more accessory dwelling units will not personally benefit us. However, re-zoning the city’s single-family (SF) neighborhoods to “residential” and changing the codes as described in the CIS above will create more affordable housing in Bryant and the rest of the city.

I have accepted the reality that my neighbor’s 1920s house and many more around us will get knocked down one of these days. Whether our neighbor’s house is replaced by a duplex or a single -family McMansion is all the same to us: We will lose our view of the Cascades, and our side yard will be so dark that nothing but moss will grow there. Seattle’s housing market, however, will not benefit from the construction of one more \$1.4 million 3,500+ sq. ft. box that houses only a family of three.

**Christopher J. Fast, CPG**

3512 NE 60<sup>th</sup> St  
Seattle WA 98115  
Phone: (206) 624-6271

**ADUEIS**

---

**From:** MIKE STECKLER <mikepammikealex@msn.com>  
**Sent:** Wednesday, November 15, 2017 2:00 PM  
**To:** ADUEIS  
**Subject:** DADU proposals

Hardly a day goes by without someone talking about Seattle's housing crisis. The frustration of price and low availability has moved many hopefully city residents to get on the freeway and head either North or South to find a home. That freeway congestion has to be reason enough to enact an alternative to Seattle's archaic zoning codes and provide for alternative city living options.

The developers have had ample opportunity to convert their properties into mega apartment units but Seattle's homeowners have been stalled in their attempt to help provide housing solutions.

If you already own a home in Seattle you know what it's like to have a piece of heaven. If you don't, that hope for home ownership is but a distant dream plagued with high cost and endless offers and beg letters.

Seattle can help to solve this problem by taking an aggressive approach to opening up the barriers to development of single family properties. I approve of the proposed changes with respect to enlarged DADUs. This would provide the opportunity to build a structure that could be large enough for two bedrooms that could accommodate couple or a small family.

Imagine ; if a couple were lucky enough to purchase a home before the prices went up so and started a family. In the event of a break up in the marriage the couple could establish a livable DADU in the back yard and both parents could live on the same property instead of one living in an apartment in Kent and the other in Everett sharing the transfer of kids on the weekends and clogging I-5.

Imagine if If you are getting along in years and you need some extra income. You could either take out a reverse mortgage that would quickly eat away at your equity or you could go into a partnership with someone that would purchase your unused backyard space and build a DADU. The two of you would own the property in a co-op arrangement sharing a pre determined neighbor lot line. That way each property partner could sell their portion if they needed to. Lawyers could work out all the other details. If Seattle wanted to, they could go a step further and create a separate tax lot for the DADU portion.

Home ownership is the American dream and that dream is in question these days. We as a city and a society need to step forward and change the building code to give people a chance at pride of ownership.

Mike Steckler

Sent from my iPad

## ADUEIS

---

**From:** Mary Sebek <mamasebek@yahoo.com>  
**Sent:** Wednesday, November 15, 2017 2:30 PM  
**To:** ADUEIS  
**Subject:** Backyard Cottage/ADU Changes

Hi,

I'm opposed to the portions of these rules that remove the requirement that the homeowner live in one of the dwellings on site, that allow for 27 foot DADU heights, and that permit three units with no off-site parking.

Removing the owner residency requirement turns a single family home into an independent, detached, triplex apartment building, with no manager on site. Allowing 12 unrelated people to live in this triplex will create huge increases in street parking issues and congestion. Allowing 27 foot heights on DADUs means more and more loss of light and green space in neighborhoods that already have experienced extraordinary losses of light and green space due to the proliferation of giant pop-up McMansions covering entire small lots from front setback to alley setback.

Please reconsider these issues. Thanks!

Mary Sebek, 331 N. 78th St., Seattle, WA 98103

## ADUEIS

---

**From:** sabina pelckmann <sabinadesigns@comcast.net>  
**Sent:** Wednesday, November 15, 2017 3:14 PM  
**To:** ADUEIS  
**Subject:** Re: Scoping comment period extended for ADU/Backyard Cottage Environmental Impact Statement

Hello,

Just filled out and sent the comments form in. I do want to make it clear I am in favor of loosening the existing restricts except for the owner occupancy which I strongly believe should remain at 50% owner occupancy. Thanks and I hope this moves forward as quickly as possible...with that said I am realistic about how government moves slowly at times.

I also read all the comments and am impressed by the number of responses. It's clear there is interest in this issue.

Thanks

Sabina Pelckmann

On Oct 31, 2017, at 10:59 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Good morning,

On October 2, we began the environmental review process to [study](#) the effects of removing barriers to creating accessory dwelling units (ADUs), often called in-law units and backyard cottages, in single-family zones. The first phase of the Environmental Impact Statement (EIS) process is to determine the scope of our analysis. Thank you to everyone who has submitted comments with suggestions for what we should consider in our study.

We know there's a lot of interest in this topic, and we want to make sure we're hearing from everyone who would like to participate. To give people more time to submit comments on our [alternatives](#) and [proposed scope](#), **we are extending the scoping comment period 15 days to November 16.** We have also published the [comments](#) received as of October 30 through the online comment form, by email, and at the two scoping meetings. (We are still reviewing comments and may not have posted [every](#) comment received to date; we will post all submitted comments with the final scoping report.)

### What are we proposing?

ADUs are small, secondary dwelling units inside, attached to, or in the rear yard of a single-family house. The objectives of our proposal are to:

- make it easier for property owners to permit and build ADUs and backyard cottages
- increase the number and variety of housing choices available in single-family zones
- encourage creation of small-scale, family-friendly homes affordable to a range of households

The proposal we're studying involves allowing both an attached and detached ADU on the same lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of backyard cottages. Based on a [decision](#) from the City's Hearing Examiner in December 2016, this EIS will review the potential environmental impacts of the proposal.

### What is scoping?

Before we begin the environmental analysis, the scoping phase is a chance to hear your ideas for the alternatives and types of impacts we should focus on. Scoping is not when we consider *whether* to implement certain policy changes — that occurs after we've completed the EIS process, and you'll have opportunities to weigh in on the proposal then.

You can send us a scoping comment in several ways:

- use our [online comment form](#)
- email us at [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- write to Aly Pennucci, City Council Central Staff, PO Box 34025, Seattle, WA 98124-4025

For more information about the ADUs, backyard cottages, and the EIS process, visit [seattle.gov/council/ADU-EIS](http://seattle.gov/council/ADU-EIS).

Thank you for being involved in this project.

Aly Pennucci and Nick Welch

**ADUEIS**

---

**From:** Heller and Fox <Heller-Fox@msn.com>  
**Sent:** Wednesday, November 15, 2017 3:42 PM  
**To:** ADUEIS  
**Subject:** Scoping comments for ADU EIS

Hello,

Here are my scoping comments for the EIS on accessory dwelling units:

1) The EIS must address each issue and conclusion that was raised in Hearing Examiner Decision W-16-004.

2) Alternative 2 calls for many concurrent changes to the code. The EIS shall examine the impacts of making multiple, simultaneous changes to the code (i.e. allowing up to three units per lot, **and** decreasing the lot size, **and** eliminating owner occupancy requirement, **and** decreasing setback requirements, **and** eliminating any parking requirement, **and** increasing building height **and** increasing lot coverage).

How do these changes interact? Are they likely to produce housing options, or unintended consequences? Examine and unbundle the impacts of making multiple, simultaneous changes to the code vs. implementing one or two changes.

3) Survey the cities that have amended their ADU regulations in the past 10 years. Have other cities, besides Seattle, experimented with making so many changes at the same time (as Alternative 2 proposes) vs. adopting one or two simultaneous ADU-related changes.

The EIS should describe and compare the experiences and results that other cities have had when they have changed their single-family zoning code to facilitate development of ADUs and DADUs

What effect will multiple code vs. fewer changes likely have on ADU production? On bulk and density on single-family lots, blocks and neighborhoods? What effect are multiple changes likely to have on green space, housing affordability, housing speculation, incentive to develop short-term rentals and conversion of existing houses to short-term rentals, parking availability in single-family zones?

Which specific changes are most likely to produce more housing for Seattle residents? Added speculation? Short-term rental housing i.e. Air B and B? Loss of green space and privacy?

4) Rather than having only two alternatives, the EIS should separate the many proposed changes to the code to offer additional specific alternatives that i.e. Alternative 3—Allow ADUs on smaller lots ; Alternative 4—Allow ADUs with no parking requirement , etc.

5) Short-term rentals, such as Air B & B, can be very profitable for their operators. Investigate how eliminating owner-occupancy requirements for ADUs could have the unintended effect of encouraging short-term visitor rentals via conversion of existing housing and new construction, rather than providing real housing options for Seattle residents.

The EIS must evaluate the impacts of no-owner occupancy on: 1) speculation in single-family housing sales; 2) conversion of existing housing for short-term rental use (Air B & B); 3) construction of new ADUs for short-term rental use; 4) the absolute number of short-term rentals (i.e. Air B and B) in single-family neighborhoods, and 5) the relationship that people have with their single-family homes i.e. as a place to live vs. a speculative property.

6) Bonus comment: Update short-term rental regulations in conjunction with ADU updates, rather than independently, as seems to be the case.

7) General thought: Before making broad changes in single-family zones, consider that many upzones in progress are likely to add many units to the housing stock.

Thanks for the opportunity to comment. Please keep me informed of future opportunities to comment and be involved in this process.

Sincerely,

Rebecca Fox

**ADUEIS**

---

**From:** Liselotte Kragh <lotte@abitastudio.com>  
**Sent:** Wednesday, November 15, 2017 4:02 PM  
**To:** ADUEIS  
**Subject:** Comparison of alternatives

Hello,

I would like to submit these comments for public record. I am a residential architect in Seattle and have lived in Seattle for 30 years. My interest in the DADU issues is personal and professional. We own two properties that due to their sizes (600 SF and 8400 SF) and the existing small houses on the properties are well suited for DADUs and we are interested in pursuing design build on both properties in the coming years, if the current zoning rules change as per my comments below.

Here is my perspective on the "Comparison of Alternatives" list.

1) Number of ADU's Allowed on a single-family lot:

Alternative 2 because...

If we want to preserve the character of Seattle's residential neighborhoods we have to make it economically viable for single family homeowners to live here. As cost of homes increase, only the most well to do can afford to buy a home or the increasing property taxes and utility costs, so if we want to keep our populations and the homes, many people will need to share their homes and properties to be able to live here. People who are willing to share their properties (and that is a small part of the population) – whether inside their homes or in a separate unit on their property or both- should be encouraged to do so. For these reason, allow both units and do not discourage creating either the ADU or the DADU's by making people choose.

Personal example: We are remodeling a home with a 740 SF footprint and a full basement, and after we move in, we plan to remodel the basement into an ADU. Since our property is large at 8400 SF and the house so small, it makes perfect sense to create a DADU in the rear of the property, but we will not give up the ADU that we have already created at that point to build the DADU, especially since we do not personally need the extra space in the basement. We will not build a DADU if this rule remain.

2) Parking:

Alternative 2 because...

Off-street parking reduces parking. Some 25 years ago I worked on legalizing an ADU in Wallingford, and a part of the requirement was to measure every single section of curb and curb cuts along several blocks in each direction. This was very educational. For each curb cut, you would get one legally parked car (i.e. not in the front setback) but you would typically lose 2 on street parking spots, sometimes 3. How does this math work? Imagine a 100 feet long uninterrupted curb. You can fit 6 cars – each approx. 16 feet. Now take away the 10 feet wide (that is the minimum) and the 5 feet on either side where you cannot park. Now you have 80 feet and can fit 5 cars on the street and one car off street. Basically you interrupted the sidewalk and created an unattractive hazard with cars backing out. But this status quo is the best case scenario assuming that you could fit cars on either side of the curb. But say that you make the 10 feet curb cut 15 feet from one end (or the street corner or another curb cut), you now have 10 feet of parking space on one side and 75 feet on the other side. You cannot fit any cars in the first 10 feet and you can only fit 4.5 cars in the 75 feet, so now you have one off-street car and 4 on-street cars, and that curb cut result in a net loss of one parking space. Note, that many driveways are much wider, as there is really no enforcement, and oftentimes the driveways remain empty because many people prefer to park on the street even if they have driveways. So I am convinced that curb cuts

reduced safety (from cars backing out into the street and across pedestrian pathways or sidewalks) , reduces parking significantly, and reduces walkability. It took me a few hours to make this study back in the day, and I am sure that the City must have record of the parking studies they required at the time that they can analyze as part of the EIS. I would like to see these meticulous parking studies be part of the EIS. That should settle this issues once and for all and we can stop spending tax money discussing it.

3) Owner-occupancy:

Alternative 2 because...

How are you going to police whether people live 6 months out of the year in their home? Is this something we want to spend tax money on? Let's be real. It is not going to happen. Anyone who have lived here for any length of time, knows that very few Seattle land use rules get enforced. Please do not make rules that will not be enforced. Are we going to tell people they have to move out of an DADU say if the owners move abroad for a few years and rent out their main house? All this rule accomplishes is to discourage a very important addition of smaller affordable and stable housing in our neighborhoods. In addition, this rule means that a property with a DADU can only be sold to someone who is willing to risk restricting their personal mobility, so in effect it is an unwise investment for anyone who realize that they may need to sell their house for a lower price than they invested in the property due to the limited number of people who would be willing to buy a property that restricts their personal freedom.

4) Minimum lot size:

Alternative 2 as long as the 35% max lot coverage remains in place.

5) Maximum SF

Alternative 2 as long as the 35% max lot coverage remains in place. The extra allowable SF increases the flexibility in the design, which is usually a good thing. Most importantly, 1000 SF excluding garage and storage area, whether DADU or ADU, allows for 2 bedrooms, which makes the unit more affordable for say two students who share the place and makes it possible for a couple or single parents with one or two children to live there. Another reason to increase the allowable SF is that it is very expensive to build "small". The cost per SF is much higher for smaller buildings than larger buildings, but the appraisal of value is typically based on SF, so a home owner would have to think very carefully before they invest in a DADU under the current rules.

6) Maximum Height

Alternative 2. The additional height will provide design flexibility and less wasted space, such as areas on the upper floor that are not tall enough to walk under.

7) Lot coverage limit (no change)

Yes, good to keep this rule.

8) Rear Yard coverage limit

Yes to study alternative 2:

Will this rule result in significant loss of tree canopy, or should replanting be part of the proposal? The proposal does seem to make sense in terms of creating housing for people who have trouble walking on stairs, but I would consider requiring making the unit fully ADA accessible if allowing the 60% rear lot coverage.

9) Location of entries

Yes to alternative 2:

This will increase design flexibility and the ability to pick the entry that works best for the floor plan and the site in terms of circulation. Very important change from a design point of view.

10) Rood features

Yes to alternative 2:

This will increase design flexibility and aesthetic appeal.

11) Number of people

No to alternative 2 - or rather I am unclear on this rule.

Is it either related or unrelated people or can you have a situation with 12 unrelated people plus an unlimited number of related people on a single family lot? That seems excessive and a parking nightmare waiting to happen. This looks like something that should be studied in greater detail in the EIS.

Sincerely,

---

Lotte Kragh, Architect  
Abita Studio Architecture + Design  
206.328.8878

[lotte@abitastudio.com](mailto:lotte@abitastudio.com)

[www.abitastudio.com](http://www.abitastudio.com)

[www.houzz.com/pro/lotte/abita-studio-architecture-design](http://www.houzz.com/pro/lotte/abita-studio-architecture-design)

**ADUEIS**

---

**From:** Deborah Shattuck <deborah.shattuck@gmail.com>  
**Sent:** Wednesday, November 15, 2017 4:49 PM  
**To:** ADUEIS  
**Subject:** scoping comments

Hi,

Additional topics or concerns:

Look at neighborhoods holistically, not as single family lots

Set limit on how many ADUs/DADUs can be built within a particular neighborhood, using density goals and identified tree canopies as guidelines

The city has two goals: increase density and protect the tree canopy.

What density is the city aiming for?

What density can the city absorb and still be a livable city? (define "livable")

What areas of the city will absorb what density?

What density will single family neighborhoods absorb?

What infrastructure is needed to meet this additional density?

How many ADUs and DADU will be needed to meet that density?

Based upon answers to these questions, set limit on how many ADUs/DADUs can be built within a particular neighborhood

Protecting the tree canopy is harder because of the way we think about private property and zoning. I can imagine most of the trees gone, and we're saying "But wait, we were protecting the tree canopy!" The problem is that the tree canopy extends across property lines. One tree out of this backyard and another tree out of another backyard, and soon the canopy is gone. But the zoning regulations were followed! To protect the tree canopy, identify and map those canopies across properties and identify them as "no build."

I know you are talking "zoning" here, but could you broaden the picture and think outside of the box? Seattle has the opportunity here to get it right. The current zoning is not working: big big houses neither increase density nor protect the tree canopy. How about starting with rethinking "zoning"?

Thank you!

[deborah.shattuck@gmail.com](mailto:deborah.shattuck@gmail.com)  
[206-285-6499](tel:206-285-6499)

## ADUEIS

---

**From:** Glenn Singer <gsingerconsulting@comcast.net>  
**Sent:** Wednesday, November 15, 2017 5:51 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

I have the following concerns about the Accessory Dwelling Units Environmental Impact Statement

- The objectives for this proposal are not clear. Better objectives might be more affordable housing, more family housing, preservation of tree canopy and yards, and development compatible with existing single-family housing.
- Only one alternative is presented for this proposal. At least two alternatives to accomplish the objective are required. You may suggest alternatives to be studied.
- The impacts of this proposal on neighborhoods, public services, and natural resources.
- Measures to avoid, minimize, and mitigate the effects of this proposal.

Glenn Singer

**ADUEIS**

---

**From:** Betty Lucas <betty.lucas@gmail.com>  
**Sent:** Wednesday, November 15, 2017 6:06 PM  
**To:** ADUEIS  
**Subject:** Accessory dwellings

I want to register my concern re: the proposed elimination of single-family homes in Seattle.

Please **do not allow** both a mother-in-law unit AND a backyard cottage on the same property.

I have lived in my home on Queen Anne for over 42 years, and of course the neighborhood has changed a lot in that time. But this big change of zoning would alter the character of the Queen Anne neighborhood, result in increasing problems of traffic, not enough parking on the streets (unless the change includes that), and increased noise.

Except for arterials, most streets on Queen Anne hill are quite narrow and with parking allowed on both sides of the street, we have to back up or take turns going down a block. If parking spaces are removed for increased density, there will be even more scarcity of parking spaces.

Our home is almost 100 years old and like many older homes, has no garage, so parking is already a problem. And many lots are narrow so adding units will compound the problems.

If there are changes made, they should consider **ONLY** mother-in-law apartments or backyard cottages, not both. And including a requirement for addition parking spaces on the property.

Thank you.

Betty Lucas  
2615 Queen Anne Ave N.  
Seattle, WA 98109

## ADUEIS

---

**From:** Julie Campbell <julie@ctabuilds.com>  
**Sent:** Wednesday, November 15, 2017 6:08 PM  
**To:** ADUEIS; Welch, Nicolas  
**Subject:** ADU EIS comments

Dear Nick and ADU/EIS team:

I am an owner of a long-time Seattle residential architecture firm, and engaged member of the Seattle AIA, and I have been *amazed* to witness the degree of controversy over the current ADU proposals – both in the public forum, and among architects ourselves! I'd like to offer my personal comments to you, based on the many conversations I've had among my neighbours and architect peers.

Our firm has designed a good number of DADUs, especially in recent years as D/ADUs have become more well-known among the general public. I personally believe D/ADUs are a great thing in this city, adding to the range of housing types, costs, and configurations; however I do *not* think they will ever be a big part of the solution to our housing shortage simply because of the very large cost of construction. An 800sf DADU rarely costs less than \$300k in construction costs, not including design or permitting fees, or sewer hook-up fees. Many potential clients over the past five years have dropped the idea of building a DADU when they learned of the probable costs. Discussions in our architect groups resoundingly confirm similar experiences. A key driver in increasing the numbers of D/ADUs will be to find ways to reduce costs for home-owners wanting to build a DADU. I will send a separate email to you (as promised to Nick) listing suggestions on this topic from the architect focus group that I convened earlier this year.

But here in this email, I wish to offer my own concerns for your consideration during the EIS:

- MANY of the DADU's that we and other architects design for our clients are built for the purpose of short-term rental - specifically AirBnB. Without doubt, building a rental unit improves the financial possibility for home ownership, but increasing the number of D/ADUs for short-term rental does not help to solve the housing shortage. Is there a reasonable way to encourage long-term residency in ADUs versus short-term rentals?
- It's been suggested to me that neighbourhood residents are against the new D/ADU proposals for fear of having renters in their midst. I frankly find this impossible to believe; in all the conversations I've had with many neighbours, and other residential architects, this notion has NEVER come up. Rather, what I believe to be truly the concern is the potential physical change: What impacts will greater building bulk and lot coverage have on tree canopy and vegetation, and shading and sunlight to neighboring homes?
- If there is no owner occupancy requirement, how can the amount and impact of developer speculation be projected, especially if two ADUs are allowed on a single property? How will speculation impact lower & middle income home owners, and those lower valued properties? How will developer speculation impact the characters and qualities of various neighborhoods and communities? My specific concern here is related to my earlier comment about the high cost for a home-owner to build a DADU. A developer however, can tear down a modest home and build a much bigger home (including ADU) and a separate DADU for much less cost per total square foot. Consequently, I project that many more developer speculation DADUs will be built under the new proposals than by independent home owners; the *physical quality* of such projects within existing neighbourhoods is what so many of us are concerned about, per my point just above.

- I think allowing 2 ADUs without owner occupancy in all SF zones will result in a chaotic assemblage of inconsistent density, without really increasing our housing stock substantially. I believe a more successful result would be achieved by removing *some* of the barriers to ADUs: remove parking requirements, address costs and fees, convert to an FAR system of lot coverage etc, but maintaining the owner residency requirement. *In addition to this*, allow for greater density along secondary arterials; that's where developers could build two ADUs on a site, or triplexes or townhouses, really make an impact on the numbers of new units that actually get built, and increase the range and cost of housing types without sacrificing others!

Thank you for considering my comments.

Sincerely,

Julie Campbell



**Julie Campbell, AIA**  
CTA Design Builders, Inc.  
Architecture & Interiors  
Ofc: 206-286-1692  
Fx: 206-545-6802  
[www.ctabuilds.com](http://www.ctabuilds.com)



**ADUEIS**

---

**From:** Cynthia <cynthjy@aol.com>  
**Sent:** Wednesday, November 15, 2017 6:34 PM  
**To:** ADUEIS  
**Subject:** EIS

please consider the following when looking at EIS study. Would much rather see ADU's increased in Wallingford that having our zoning changed and allowing more stories goin g up in our residential neighborhood. I did send in a few comments earlier but here are some the Wallingford City Council has raised. So a few more for your consideration. cynthia yatchman

- The objectives for this proposal are not clear. Better objectives might be more affordable housing, more family housing, preservation of tree canopy and yards, and development compatible with existing single-family housing.
- *The objectives in the EIS of the proposal should be to increase affordable housing units, to increase family-size housing units, to preserve the tree canopy and green-space, and to require development compatible with existing single-family housing.*
- *The EIS should study an alternative that keeps the existing owner-occupancy requirements, while removing the parking requirements and changing the development standards for size and location of DADUs.*
- *The EIS should study an alternative that keeps the existing owner-occupancy requirements and parking requirements and ADU size requirements, while changing the requirements for lot size and location of DADUs.*
- *The EIS should study an alternative that keeps the existing owner-occupancy requirements and parking requirements and ADU lot location requirements, while changing the requirements for size of ADUs.*
- *The EIS should study an alternative that keeps existing requirements for lots under 10000 SF, while changing the requirements for larger lots.*
- *The EIS should study an alternative that keeps existing ADU requirements, with the City financing the King County Sewer Capacity fee for a DADU in exchange for that unit being an affordable rental housing unit in the City's Housing program.*
- *The EIS should study an alternative that keeps existing ADU requirements, with the City financing ADU "in-law apartment" redevelopment in exchange for those units being affordable rental housing units in the City's Housing program.*
- *The EIS should study an alternative that keeps existing ADU requirements, with the City developing neighborhood pre-approved plans for DADUs on different lot sizes.*

- *The EIS should study the impacts of real-estate speculation in ADU rentals on affordable housing.*
- *The EIS should study the impacts of AirBnB type short-term rentals for ADUs on affordable housing.*
- *The EIS should study the impacts of the proposals on tree canopy, green space, play spaces, and recreation.*
- *The EIS should study the impacts of the proposals on parking for neighborhoods including residents and small businesses.*
- *The EIS should study the impacts of the proposals on sewers, sewage treatment, and water-quality.*
- *The EIS should study the impacts of the proposals on public services including fire and police.*
- *The EIS should study the impacts of the proposals on utilities including water and electricity.*
- *The EIS should study the impacts of the proposals on transportation including traffic congestion, and the adequacy and availability and cost of public transit.*
- *The EIS should study the impacts of the proposals on schools including overcrowding and playfield space.*

**ADUEIS**

---

**From:** Denman M Bird, Jr <dennybird@me.com>  
**Sent:** Wednesday, November 15, 2017 7:21 PM  
**To:** ADUEIS  
**Subject:** Single family up zone

As a resident in a neighborhood in Seattle for almost 30 years, I'm very concerned about how this proposed rezoning will affect our neighborhoods. I would first like to agree we need affordable housing for our city but it needs to have an EIS to fairly study the impacts on our infrastructure. I am not in agreement that one blanket rezoning is going to make our city a better place to live. We already have major traffic problems, our water and sewer systems are at near capacity in many areas, our electrical grid should be upgraded not to mention parking issues if it's not required.

Personally, I think the only benefits are to the developers. I myself own properties in residential neighborhoods and could benefit financially from this zoning change but I don't think it's in the best interest of several established neighborhoods. There is some truth to ONE SIZE DOESN'T FIT ALL...

In summary, please reconsider your approach to up zoning Seattle.

Thanks,

Denny Bird

## ADUEIS

---

**From:** Mark Alguard <malguard@gmail.com>  
**Sent:** Wednesday, November 15, 2017 7:24 PM  
**To:** ADUEIS  
**Subject:** Accessory dwelling unit EIS Comments

Hello-

I would like to comment on the proposed accessory dwelling unit code changes.

I believe the changes to allow larger and somewhat taller dadus is a good idea because the current size limitation is too restrictive and makes it impossible to build a reasonably sized detached apartment above a two car garage. I also support the relaxing of parking requirements in most situations but it does seem that certain areas could be overburdened with extra cars. I strongly disagree with the idea of allowing an adu and dadu on a property without the owner required to live on the property. I think this will certainly lead to absent and investment landlords essentially buying and renting out 3 unit apartment buildings in single family zones. The city should still consider owner occupancy of single family dwellings to be a priority. I think this part of the proposed legislation should be reconsidered.

Thanks,  
Mark Alguard  
5802 56th ave NE  
Seattle, WA 98105  
206-963-8951

Sent from my iPhone

**ADUEIS**

---

**From:** Mike Larson <mlarson@sram.com>  
**Sent:** Wednesday, November 15, 2017 8:30 PM  
**To:** ADUEIS  
**Subject:** ADU EIS

Hello,

I object to the proposal being considered.

I am currently the owner and occupant of a house with an attached dwelling unit. The ADU is modern and very well maintained, approximately 720 square feet, with a private backyard for the tenant, with in-house free laundry, off-street parking, and additional storage in the garage. We currently rent it for \$1100 per month, including utilities. Comparable rentals in our neighborhood are \$1700 to \$1800 – so we are offering nice and affordable housing NOW under current law.

My objections are listed below:

1. Allowing a detached dwelling unit on a lot as small as 3200 square feet is pushing things too far. Keeping the current requirement to lots of 4000 square feet is reasonable.
2. Not requiring the owner of an attached or detached dwelling unit to also reside on the property is very objectionable. There is no practical difference between this and any other rental type where the owner is not an occupant. Part of the attraction of living in a detached or attached dwelling unit is to have your landlord nearby. Part of the attraction for being the landlord is consistent monitoring of the property. Keep the current requirement that the owner must reside on the property.
3. Not providing parking is also very objectionable. My neighborhood (Ballard) is already too swamped with parked cars. If an owner can afford to convert or build an ADU or DDU, they can also afford to make off-street parking available. I know this because I've done it. Find another way to get people to drive less.
4. Stop "sugar-coating" this proposed rezoning plan as "affordable". Incenting developers is not going to work. Simply by making the dwelling units under a certain size will do nothing to reduce rental fees. People will pay what they can afford to live near or in certain neighborhoods, regardless of size. My unit is an example – it's pretty small but it's nice and located favorably, and we could rent it for an amount well above what is considered "affordable". I would be happy to endorse a proven and sustainable plan to keep things affordable – but the current proposal is purely speculative and wishful. As far as I can tell, the only people benefiting from this proposal are the developers – who usually don't live in our neighborhoods. Where is the fairness in that?
5. I support more dense neighborhoods – and the current laws allow this. I think the city should consider making it easier to register and then inspect dwelling units. Calling these registration and inspection fees "fees" is a joke. It's a tax on landlords –so please call it that.
6. Stop making people feel guilty about wanting to keep single family dwellings in their neighborhoods. That's why they moved there in the first place, and that's why they invested in their properties. Otherwise they would have moved into a townhome or condo.
7. Stop calling DDUs "backyard cottages". It's cynical to try to rename them something cute so they sound less intrusive.

I object to the proposal being considered.

Mike Larson  
1132 NW 64<sup>th</sup> Street

Seattle, WA 98107

## ADUEIS

---

**From:** Mira Latoszek <mira.latoszek@gmail.com>  
**Sent:** Wednesday, November 15, 2017 8:52 PM  
**To:** ADUEIS  
**Subject:** ADU EIS Scoping comments

I support additional flexibility in construction of ADU/DADUs in residential, single family zones. However, I believe that the alternatives should be different than the two presented as this is a one-size fits all approach. Single family zones vary greatly in their character and surroundings and this should be reflected in this proposal. The ADU/DADU allowances should be different in areas where the property is near facilities such as schools, parks, commercial districts, etc. versus in single family zones further away from such amenities and especially if near environmentally critical area such as green spaces and shorelines. Please reconsider setting up the EIS with just two alternative so that the only choices are no change and maximum change. There should be a finer grained approach to reflect the varying character of Seattle.

The analysis should also include impacts to historical/cultural resources, construction feasibility for limited income homeowners, solar access, and wildlife habitat. For example:

- Is the architectural style of the unit compatible with the existing house and the surrounding neighborhood? Can the unit be used as an live/work space for an artist?
- Do the changes make it possible for homeowners to stay on their properties as they age and taxes increase? Will it be possible for limited income homeowners to construct units so they can continue residing on their property rather than selling to a higher income individual or developer?
- Are sewer line upgrade requirements to 6 inch diameter necessary for ADU/DADU's in single family zones? Does this extra cost reduce the ability of homeowners to build ADU/DADU's? Are there other ways to reduce the costs for these developments such as waiving permit fees?
- Do the changes enhance or detract from using the property for solar energy?
- Do the changes enhance or degrade wildlife habitat for birds, insects and mammals?

### Comments on specific options in the alternatives

#### Number of ADUs allowed on a single-family lot and minimum lot size for a DADU

I agree with allowing both ADU's and DADU's on a single family lot with the limitation of 3200 sq foot lot size for a DADU.

#### Parking

I agree with not requiring off street parking in areas where street infrastructure is built out. However, homeowners who provide off-street parking when developing an ADU/DADU should get credits and/or exemptions for doing so. Off street parking should still be required in areas where there are no sidewalks, curbs and gutters to minimize the possibility of blocking access for pedestrians and vehicles.

#### Owner-occupancy

Owner occupancy should be reduced to allow for flexibility for owners but not entirely eliminated. Removing it entirely could lead to speculative development. However, I think that it is unfeasible to require a minimum residency

requirement on an on-going basis. ADU/DADU permits should only be issued to existing homeowners who occupy the property at the time of the permit issuance which can be verified by real estate tax documentation.

Maximum square footage/height and roof features

I support allowing additional square footage for DADU's. However, I do not support raising the maximum height limit, except for narrower lots that would need the extra height to get a second floor. 23 feet is more than enough height for a 2 story structure, so there is no need to go higher. Raising maximum heights will lead to bulkier structures that will upset neighborhoods and sour attitudes toward ADU/DADU development. The only exception to the existing limits should be made for solar energy collection equipment.

Lot coverage limit, rear yard coverage limit and setbacks

The distinctions between lot coverage, rear lot coverage and setbacks are confusing. Eliminate the requirement for DADU to be in rear yard, as some existing homes have more front yard space than backyard space. State lot coverage as a maximum for all habitable structures, rather than dictate only rear yard coverage. Since the point is to increase density, make setbacks consistent or similar to LR1 zoning. Provide a streamlined review process. A streamlined process is available for other upzones, such as LR1.

I am concerned that the change to 60% coverage from 40% will result in the loss of too much green space and tree canopy coverage. An increase to 60% coverage will also reduce outdoor open space for building occupants. Lot coverage should be remain at 40%, and instead encourage 1.5 to 2 story structures for extra interior space, and more outdoor ground level open space.

Location of entries

The change to "any facade" for entrances to DADU's is good, but the ten foot requirement from the lot side line is too wide a requirement, given that building side setbacks are only 5 feet in most houses. Side setback requirements should be 5 feet for entrances, and rear setbacks should remain at 10 feet. DADU's should have the first floor at ground level and be ADA accessible.

Thank you,

Mira Latoszek  
2218 14th Ave S.  
Seattle, WA 98144

**ADUEIS**

---

**From:** patandvickib <patandvickib@comcast.net>  
**Sent:** Wednesday, November 15, 2017 9:21 PM  
**To:** ADUEIS  
**Cc:** Burgess, Tim; Durkan, Jenny; Herbold, Lisa; Harrell, Bruce; Sawant, Kshama; Johnson, Rob; Juarez, Debora; Bagshaw, Sally; O'Brien, Mike; Harris-Talley, Kirsten; Gonzalez, Lorena; Pennucci, Aly; Welch, Nicolas; Freeman, Ketil  
**Subject:** Scoping Comments pertaining to the ADU-EIS

Dear Representatives,

We are writing to request you to reconsider the proposed changes to existing ADU regulations. I submit as my comments those put forth by the Queen Anne Community Council Land Use Review and Planning Committee and submitted below each proposed change as Alternative 3.

Regards,

Vicki Buechting and Pat Priestley

\*\*\*\*\*

Re: Scoping Comments pertaining to the ADU-EIS Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the exiting code as a top-down one- size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

Hearing Examiner File: W-16-004 Associated File Numbers: Department Reference Numbers: Date: December 13, 2016

Type: SEPA, Design Review, Environmentally Critical Areas Examiner: Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to

the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

Page | 1

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair

Queen Anne Community Council Land Use Review and Planning Committee ADU-EIS Scoping Comments

1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

(Alternative 1) (Alternative 2)

**Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

**City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.

We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered

infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.

Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.

Page | 2

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3)

2. Parking:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) OR one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

Existing Land Use Code Regulation

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

City Proposed Change to: No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits- all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread

throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) Queen Anne Adds: One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

### 3. Owner Occupancy:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

City Proposed Change to: No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

Page | 3

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) Queen Anne Adds: No Alternative-Leave owner occupancy requirement unchanged.

### 4. Minimum Lot Size for a DADU:

**(Alternative 1) Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

**(Alternative 2) City Proposed Change to: 3,200 sq ft minimum**

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot size requirement unchanged.**

## 5. Maximum square footage:

**(Alternative 1)****(Alternative 2)****Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas DADU (Backyard Cottage): 800 sq ft including garage and storage areas

**City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

Page | 4

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3)

6. Maximum Height:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft, cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No change from existing height limits, which vary by lot width and range from 15-23 feet

City Proposed Change to:

Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3)

Queen Anne Adds: Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 7. Lot Coverage Limit:

**(Alternative 1) Existing Land Use Code Regulation**

35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

**(Alternative 2) City Proposed Change to:**

No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage requirement unchanged**

Page | 5

## 8. Rear Yard Coverage Limit:

**(Alternative 1)****(Alternative 2)****Existing Land Use Code Regulation**

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

**City Proposed Change to:**

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.

**(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.**

## 9. Location of Entries:

**(Alternative 1)**

(Alternative 2)

Existing Land Use Code Regulation

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

City Proposed Change to:

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.

(Alternative 3)

10. RoofFeatures:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No exceptions for roof features on accessory structures are allowed.

City Proposed Change to:

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Roof Features requirement unchanged

11. HouseholdSize:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

#### City Proposed Change to:

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Household Size requirement unchanged

12. MHAR requirements:

#### (Alternative 1) Existing Land Use Code Regulation

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

#### (Alternative 2) City Proposed Change to:

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.

(Alternative 3) Queen Anne Adds: Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

13. Rental Registration and Inspection Ordinance (RRIO): (Alternative 1) Existing Land Use Code Regulation

Property owners renting one or more units, including in Single Family zones, must register for

inspections to ensure housing is safe and meets basic maintenance requirements.

#### (Alternative 2) City Proposed Change to:

No Change

**Concerns:** There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.

(Alternative 3) Queen Anne Adds: No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

#### 14. Issues of Concurrency

**Concerns:** The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12.

We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure before said growth occurs. This

Page | 7

has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:

**A. Schools:** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on- ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

Page | 8

**ADUEIS**

---

**From:** dollyv43 <dollyv2u@gmail.com>  
**Sent:** Wednesday, November 15, 2017 9:25 PM  
**To:** ADUEIS  
**Subject:** Impact of suggested changes by EIS

Seattle is a beautiful city, enhanced by the water that surrounds it but at the same time limited when it comes to development by the same natural borders. The current demand for housing at all levels is limited. It is difficult to comprehend addressing low income housing in an area where housing of any kind is at a premium. I feel it is important to preserve the integrity and character of our single family neighborhoods and look towards developing multifamily housing where the density doesn't take away from what has existed in many areas for over a 100yrs. We've had zoning codes for a reason.

I have lived in West Seattle for close to 20yrs. The neighborhood streets have become single lane roads with the excess of vehicles parked on the streets. Not only is the traffic congestion an issue, it is hazardous for kids and pets to be anywhere near the street since visibility has become so limited. Permitting the development of three residences on a small lot with no requirement of offstreet parking is a density nightmare. To assume the addition of small cottages or ADU will be built to offer a low cost option is not reality. My experience is that the additional units will be a source of increased income for the present owner who in most cases will maximize his return. Part of the issue in availability is how high rents of any kind have sky rocketed. Absentee owners will definitely reduce oversight on a crowded lot, noise levels become critical along with maintaining equity in such a small space. I believe the single family neighborhood has a right to exist where already established.

I believe development should take place where there is room to expand a multifamily format. High Park is a development that seems to have worked. The area adjacent to lite rail along Martin Luther King would make sense with easy access to transportation. The focus needs to be outside the City proper to address the challenge without destroying the City we love.

Ariel Vinal

Email: [dollyv2u@gmail.com](mailto:dollyv2u@gmail.com)

**ADUEIS**

---

**From:** Denise Beard <dkbeard@comcast.net>  
**Sent:** Wednesday, November 15, 2017 10:13 PM  
**To:** ADUEIS  
**Subject:** Re: Seattle Single Family Zoning Upzone/Backyard Cottages Proposal

Dear Aly & Nick.

With all due respect, I don't see how it would be possible to meet set back & lot coverage rules on a 3200 sq ft lot by adding a 1,000 sq ft DADU.

If I am not able to add a wrap around porch to a 2 story 1480 sq ft house ( that's 740 sq ft footprint) on a 5700 sq ft lot, I am not able to see how these DADU's & ADUS would be able to meet the same standards. Especially on a 3200 sq ft lot.

Sincerely,  
Denise Beard

On Nov 15, 2017, at 8:01 AM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Denise,

Thank you for your additional comments, which we will consider along with your comment from October 25 at the end of the comment period as we determine the scope of our EIS analysis. **Note that we extended the comment period 15 days to November 16.**

You expressed a concern that the ADU/DADU proposal ignores setback and lot coverage rules. These standards do in fact apply to ADUs and DADUs as they do to single-family homes. Someone building a DADU must still comply with the overall lot coverage limit for the entire lot and required setbacks. We are not proposing to study any changes to the lot coverage limit.

Best,

Aly Pennucci & Nick Welch

---

**From:** Denise Beard [<mailto:dkbeard@comcast.net>]  
**Sent:** Tuesday, November 14, 2017 10:09 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Seattle Single Family Zoning Upzone/Backyard Cottages Proposal

Dear Aly,

I felt I needed to send a follow up email regarding this proposal.

While I understand the good intentions behind this proposal, there are too many issues about it that will be detrimental to the quality of life for those of us who worked very hard to buy our little house with small yard in a single family zone in Seattle.

1. We have **Urban Village Designations** in this city, these areas are the areas that should be developed with to their potential before the city even thinks about getting rid of single family zoning. They are also the areas with the best access to mass transit.

2. **Number of ADU's or DADU's on a single family lot:** to think that having 3 total units on a 3200 sq foot lot is a good idea with NO IMPACTS ( or even on a 4,000m sq ft lot which is typical in my QA neighborhood) boggles my mind. We have a very modest house, 1,480 sq ft & a nice little yard. We have been thinking for the entire 20 years we have owned our home, that we would like to remodel & add on ( it is a very cramped home) , but even going out 10 more feet would reduce our yard to a postage stamp. (And it has been unaffordable) We have dogs & enjoy sitting out under our trees & to lose even 10 feet would dramatically impact our feeling of space & privacy. I cannot even imagine squeezing TWO units of 1,000 sq ft onto our lot.

If this was to happen on multiple lots throughout the neighborhood, that would take out tree canopy ( something the city claims to care about) & dramatically impose on any privacy & livability.

I will also note that were we to proceed with ANY remodel & increase of our homes footprint, we would be subject to set back rules & lot coverage. We considered a wrap around front porch but were told that it would not be allowed.... not enough setback. This ADU/DADU proposal totally ignores setbacks & lot coverage. Why do we as single family homes owners have to abide by these rules & people applying to build ADU/DADU do not? The rules should apply to everyone....

3. **Parking:** There is much less in the way of accessible **mass transit** in single family neighborhoods, so it makes no sense to crowd more development into these areas. If people do not have good & frequent access to mass transit, they will continue to drive their own cars... which brings me to the proposed abolishment of off street parking to be required. Neighborhoods are already overwhelmed with cars & to bring in potential 12 new cars to a single lot ( because the proposal would allow up to 12(!!!) non related people living in each ADU/DADU on a single lot) & multiply that by how many homes in the neighborhood that chose to develop would be an impossible situation.

Which brings me to the lie that our city leaders & developers are trying to force on us & that is that millennials & newcomers are coming without cars. That is disingenuous & not true. According to **DOL**, nearly 80,000 NEW drivers license were issued in King County in 2016. I am going to step out on a limb & say that the vast majority, if not all of those newcomers are millennials or Gen Xers here for tech jobs & they are bringing their cars. They may not all commute in them, but the cars have to park somewhere & that somewhere is on the neighborhood streets. ( As an example, a millennial who lives in a grandfathered smallish apartment building a block away, just bought a BRAND NEW car last week & guess what? It is parked right in front of our house. And it sits there all day & all night. The apartment building only provides 8 off street parking spaces so many park away from where they live) The city needs to be honest.

Additionally, even the buildings that provide off street parking, charge so much for it, that many choose not to pay AND then where do they part their cars? On the street.

4. **Owner Occupancy:** To not require owner occupancy absolutely boggles the mind. Does anyone in the city planning or govt actually believe for one minute, that this will not encourage speculation & developers to buy up single family homes as they go up for sale & then develop the property to the maximum ( an ADU & a DADU)? How exactly does this help the affordability problem? It does not. We will have absentee landlords, charging the maximum they can get away with ( market rates) in order to recoup their investment.

If you have an Owner Occupancy requirement, then you have someone who actually might care about the livability of the neighborhood & be invested in it beyond the profitability of their venture. But I also do not believe that even if the owner living in the original unit who builds these accessory units will end up with units that are affordable. ( And I refer to affordable to people who have been displaced when their apartment or home was sold & then redeveloped.)

We personally have not remodeled due to cost, & to build one or two 1,000 sq ft. units would be beyond our ability to afford, unless we charged enough rent to cover our costs & make some profit. I do not blame a developer for needing to cover their costs. And that is exactly what they will do.

At the end of the day, this proposal does nothing but enrich developers & speculators. It might increase housing stock a bit, but it is not going to be affordable, & at what cost to the quality of life?

**5. Infrastructure:** In many of the older Seattle neighborhoods, ( like mine on QA) the infrastructure is OLD & insufficient to handle the kinds of increases in density this proposal would allow. This means narrow & pot holed roads, water supply, old pipes, sidewalks, etc. Single family neighborhoods ( especially the old ones in Seattle) were never engineered to accommodate multi family densities & the impact will be huge if this proposal is allowed.

All the surrounding cities charge developers impact fees, but not Seattle. Why is Seattle allergic to the concept of "Growth paying for growth"?

In such a "progressive" city ( faux progressive, since kowtowing to developers is the opposite of progressive) I am saddened that the city has chosen to go after us older single family homeowners.

Most of us worked HARD to be able to own our home in a safe, beautiful single family neighborhood. We made a contract with the city when we purchased & paid the price ( including high property taxes) to live the American dream of home ownership in a single family neighborhood. We are holding up our end of the contract by paying our taxes, keeping our property up, building community over this many years & helping to make this city one everyone seems to want to move to. Our neighborhoods are what makes Seattle special. All I have to say is take a look at Ballard. It is unrecognizable.

If I wanted to live cheek by jowl with others I would have purchased a condo in a building downtown...or Ballard. I have lived my entire adult life ( 40 years) in Seattle on QA ( born in Tacoma, so yes one of those rare natives) & worked very hard to have the modest home I have, which i am grateful for. But I worked hard for it. I am not criminal, racist or any of the other names certain city leaders have used to describe me while not admitting to their own shortcomings in managing this city.

In closing, I am offended & tired of the city using Single Family Homeowners as Scapegoats for their inability to manage the explosive growth.

And especially by putting forth a proposal that will not solve the problem they are trying to solve & will impact negatively the quality of life in so many ways. And will only enrich developers & speculators in the end. Why are the concerns of the average & long time tax paying citizens not considered?

Please do the right thing & do not approve this proposal.

Sincerely,  
Denise Beard

**ADUEIS**

---

**From:** Gerry <gerry@roanokecap.com>  
**Sent:** Thursday, November 16, 2017 12:00 AM  
**To:** ADUEIS  
**Subject:** Comments on EIS and proposed Changes for Detached and Unattached Accessory Dwelling Units

Dear Ms. Pennucci:

I support "no action" or the development of a third alternative that would adequately protect single family neighborhoods and low density housing areas.

The development of Seattle has been going at a pace which has set a stage for gridlock in large areas of Seattle, just based on committed projects which have yet to be filled with commuters and folks who will be parking their cars day and night on our city streets. There have been substantial reductions in arterial capacity throughout the city both by excessive traffic and by taking out car lanes for transit and bike use.

And there have been reductions in parking by changing regulations for offsite parking for new housing units. All of this has set in place a future which we know will be far worse than the present which is increasingly is seen as debilitating for the city.

To take actions which will increase the density of single family neighborhoods will hurt seattle in many ways because those areas are already serving as a relief valve. I live in a single family neighborhood which fills up with cars parking to access transit. My neighborhood offers the scenic route for biking and walking commuters. And it also offers a multitude of jobs for those who earn wages by low tech rather than high tech work. Destroying such neighborhoods with high density doesn't just destroy much of the city's beauty, it will greatly worsen the gridlock that is now occurring. It will disproportionately eliminate tree canopy. It will make it even harder for cars to bypass congealed traffic on the arterials of Seattle. It will tax water and sewer and rain water disposal systems that are at capacity. And it will beat up roads the City already is unable to keep maintained.

It is time to stop this "everything must be developed to its limits" effort and to let the current increases in population and commute patterns stabilize to see if we in fact have a city that can handle the new levels that have been permitted. My expectation is we will discover that we have gone past workable levels. I have studied EIS work done as part of the SR520 expansion extensively. I have found its traffic studies worse than pathetic, and worse than irresponsible, but they do not care. So the approach is empirical, don't worry about "failed intersections," just assume cars will do elsewhere or not go. But a healthy vibrant city needs transport that works and there is no sign that we know how to match that need to the population that is being attracted.

Also, we are only now starting to learn what the Abnb impact on single family residential areas will be. I am confident they will on their own have a significant adverse impact of increased population per lot with increased parking needs. Any ADU or DADU can be expected to accelerate this movement.

All new units, ADU or DADU should be required to have off street parking. one place for each unit.

ADU and DADU should not be allowed on the same property.

Lot coverage limits should be maintained to encourage tree and green space.

ADU and DADU development that blocks views and shades adjacent housing should be proscribed.

The number of unrelated people living on a single family lot should be limited to 5 or 6.

It is important to the stability of single family neighborhoods that owner occupancy be preferred over rental occupancy.

Sincerely yours,

Gerald Conley  
2636 Tenth Avenue East  
Seattle, WA 98102

**ADUEIS**

---

**From:** Dennis Haack <seahaacks@yahoo.com>  
**Sent:** Thursday, November 16, 2017 3:24 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

This proposal, as crafted currently, does not adequately protect our neighborhoods from congestion nor address the safety, aesthetics and purpose of single family neighborhoods. The result can be a "shanty town" of scattered lots in the in the block that will have several unrelated people living on the same property, similar to an apartment building, with all the same problems that come with this.

Loss of vegetation and adequate architectural and siting protections are not addressed --all these are in place with the existing ordinance and coning and should not be changed.

The removal of parking requirements will result in more on street parking, more streets with parking on both sides and the resultant single lane streets that are dangerous and congested.

This proposal does not protect our neighborhood's character and integrity , nor does it offer adequate optional proposals.

This proposal needs to be significantly downsized and restricted to areas already zoned multi-family.

Dennis Haack

## ADUEIS

---

**From:** Jean Rempfer <rempfer\_332@yahoo.com>  
**Sent:** Thursday, November 16, 2017 6:29 AM  
**To:** ADUEIS  
**Subject:** ADU rules

Hello,

I have emailed before, and would like to restate that in long, narrow houses with 4 bedrooms, 3 full bathrooms, three kitchens it should be allowed to turn it in to s tripled.

This is way too much space for two elderly people in Ballard. Each portion of the house has its own yard. Permission to create triplex, please.

This will create good homes for 3 families, owners can move out.

Thank you,

Jean

[Sent from Yahoo Mail on Android](#)

## ADUEIS

---

**From:** Paul Iremonger <pauliremonger129@gmail.com>  
**Sent:** Thursday, November 16, 2017 8:06 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The parking situation in Wallingford is already a mess.  
Any plans that will decrease the number of on street parking spots will simply make a bad situation worse.  
Don't do it.

**ADUEIS**

---

**From:** Ann Prezyna <houseboata@gmail.com>  
**Sent:** Thursday, November 16, 2017 9:29 AM  
**To:** ADUEIS  
**Subject:** Comments on Accessory Dwelling Unit EIS

I am a resident of the Eastlake neighborhood. Please consider my comments on the accessory dwelling units EIS. Thank you. Ann Prezyna

- **The city should should assess the impact of each ADU project proposal on open space, trees, urban forest canopy volume and neighborhood tree canopy goals set forth in the Urban Forest Sustainability Plan.**
- **The city should conduct a detailed canopy impact assessment for each ADU project proposal, tally tree losses, track changes in tree canopy over time, and assess project impacts on reaching city tree canopy goals.**
- **The city should require mitigation measures to compensate for canopy loss from an ADU Project. Mitigation projects should require the planting of trees with equivalent canopy volume. The city should require project applicants to pay into a tree replacement fund for this purpose.**
- **The city should provide a two week public notice and comment period before any trees may be removed.**
- **The city should provide incentives to encourage the saving of exceptional trees on site.**
- **Tree loss should be minimized or avoided because of the environmental services provided by trees such as stormwater retention, air pollution reduction, higher neighborhood property values, animal habitat, visual screening, noise reduction, and positive effects on wind and heat patterns.**

**ADUEIS**

---

**From:** Tess IMAP <tessla@comcast.net>  
**Sent:** Thursday, November 16, 2017 9:47 AM  
**To:** ADUEIS  
**Cc:** Burgess, Tim; Durkan, Jenny; Herbold, Lisa; Harrell, Bruce; Sawant, Kshama; Johnson, Rob; Juarez, Debora; Bagshaw, Sally; O'Brien, Mike; Harris-Talley, Kirsten; Gonzalez, Lorena; Pennucci, Aly; Welch, Nicolas; Freeman, Ketil  
**Subject:** Scoping comments

Hello.

I am a Seattleite who has lived on Queen Anne hill since 1975. I am urging you to reconsider proposed changes to existing ADU regulations.

I submit as my comments those put forth by the Queen Anne Community Council Land Use Review and Planning Committee and submitted below each proposed change as Alternative 3.

Most important? infrastructure, parking, and trees. A wonderful neighborhood would become even more generic and slapdash. Less green, less user friendly. Again, please consider Alternative 3.

Sincerely,

Teresa Williamson

\*\*\*\*\*

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the exiting code as a top-down one- size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

Hearing Examiner File: W-16-004 Associated File Numbers: Department Reference Numbers: Date: December 13, 2016

Type: SEPA, Design Review, Environmentally Critical Areas Examiner: Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

Page | 1

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee Martin Henry Kaplan, AIA Chair

Queen Anne Community Council Land Use Review and Planning Committee ADU-EIS Scoping Comments

1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

(Alternative 1) (Alternative 2)

Existing Land Use Code Regulation:

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

City Proposed Change to: A Single-family lot can have both AADU and a DADU

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

Comments: During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.

We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.

Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.

Page | 2

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3)

## 2. Parking:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) OR one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

### Existing Land Use Code Regulation

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

City Proposed Change to: No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

Comments: Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) Queen Anne Adds: One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. Owner Occupancy:

(Alternative 1)

(Alternative 2)

## Existing Land Use Code Regulation

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

City Proposed Change to: No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

Comments: The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

Page | 3

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) Queen Anne Adds: No Alternative-Leave owner occupancy requirement unchanged.

#### 4. Minimum Lot Size for a DADU:

(Alternative 1) Existing Land Use Code Regulation

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

(Alternative 2) City Proposed Change to: 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

Comments: Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the

oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of ‘concurrency’ planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot size requirement unchanged.

#### 5. Maximum square footage:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas DADU (Backyard Cottage): 800 sq ft including garage and storage areas

City Proposed Change to:

AADU (Mother-in-Law in house unit): 1,000 sq ft excluding garage and storage areas DADU (Backyard Cottage): 1,000 sq ft excluding garage and storage areas

Concerns: Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one’s home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one’s neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU’s/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU’s to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these “Backyard Cottages” may be larger than the main house on the property. These would not be DADU’s/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O’Brien proposes will greatly increase the impacts to neighbors who will see larger “Backyard Homes,” and not ‘Backyard Cottages’ built next door. Again, like all these proposals, O’Brien assumes a one-size-fit-all solution here when in most

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3)

6. Maximum Height:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

Existing Land Use Code Regulation

No change from existing height limits, which vary by lot width and range from 15-23 feet

City Proposed Change to:

Height limits are 1-3 feet higher than existing limits, depending on lot width

Concerns: We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3)

Queen Anne Adds: Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are

located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

#### 7. Lot Coverage Limit:

(Alternative 1) Existing Land Use Code Regulation

35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) City Proposed Change to:

No Change

Concerns: Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage requirement unchanged

Page | 5

#### 8. Rear Yard Coverage Limit:

(Alternative 1)

(Alternative 2)

Existing Land Use Code Regulation

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

City Proposed Change to:

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

Concerns: Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said

property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.

(Alternative 3) Queen Anne Adds: No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

#### 9. Location of Entries:

(Alternative 1)

(Alternative 2)

#### Existing Land Use Code Regulation

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

City Proposed Change to:

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

Concerns: The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.

(Alternative 3)

#### 10. RoofFeatures:

(Alternative 1)

(Alternative 2)

Queen Anne Adds: DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

#### Existing Land Use Code Regulation

No exceptions for roof features on accessory structures are allowed.

City Proposed Change to:

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

Concerns: The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Roof Features requirement unchanged

Page | 6

11. HouseholdSize:

(Alternative 1)

(Alternative 2)

Existing Land Use Code Regulation

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

City Proposed Change to:

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

Concerns: The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.

(Alternative 3) Queen Anne Adds: No Alternative-Leave Household Size requirement unchanged

12. MHARrequirements:

(Alternative 1) Existing Land Use Code Regulation

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) City Proposed Change to:

No Change

Concerns: There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.

(Alternative 3) Queen Anne Adds: Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

13. RentalRegistrationandInspectionOrdinance(RRIO): (Alternative 1) Existing Land Use Code Regulation

Property owners renting one or more units, including in Single Family zones, must register for

inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) City Proposed Change to:

No Change

Concerns: There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.

(Alternative 3) Queen Anne Adds: No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

14. IssuesofConcurrency

Concerns: The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12.

We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure before said growth occurs. This

has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:

A. Schools; Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

B. Community Centers, Libraries, Parks, Pools, and Public Amenities: Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

C. Roads and Traffic: Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on- ramps, and major arterials and freeways as well;

D. Parking: Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

E. Utility Infrastructure: The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

F. Public Transportation: As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** Lon Kissinger <lkisssea@gmail.com>  
**Sent:** Thursday, November 16, 2017 10:01 AM  
**To:** ADUEIS  
**Subject:** Comment on Scoping for the Accessory Dwelling Unit Environmental Impact Statement.

Dear Sir/Ms.,

I am writing to comment on the scoping for Accessory Dwelling Unit Environmental Impact Statement.

- **The objectives for this proposal are not clear.** The EIS should evaluate:
  - The degree to which more affordable housing will be provided.
  - The effect of increased density on the feeling of community and interconnectedness in neighborhoods.
  - The effect of the proposal on tree canopy, green space, and yards,
  - The impact of this proposal on the current aesthetics and “feel” of single family neighborhoods.
  - How changes in available parking will impact neighborhoods.
  - The impact on infrastructure and support services essential to neighborhoods: power, sewer, water, streets, public transportation, open space for recreation, capacity of schools, fire and police.
- **In each of these cases the EIS should examine ways to mitigate negative impacts. In particular, design standards should be developed so that out of scale ADUs will not adversely impact neighbors and change the aesthetics and feel of single family neighborhoods.** Throughout the City, one can find examples where developers have pushed limits in the pursuit of profitable projects near and in single family neighborhoods, damaging aesthetics and community. Design standards are essential to avoid this.
- **The EIS should evaluate an option that includes waiving parking requirements, but retains owner occupancy.** ADUs should be a means to provide home owners, particular aging individuals, with revenue to stay in Seattle. ADUs should not be a back door for developers to convert single family to multifamily zoning. Seattle is already virtually waiving parking requirements for large developments, single family home owners should be afforded some flexibility around parking as well.
- **The EIS should look at financial incentives for homeowners to build ADUs if the resulting ADUs will be rented at rates that are consistent with affordable housing guidelines.**
- **The EIS should evaluate neighborhood approval of ADU design standards for that neighborhood.**

Thank you very much for the opportunity to comment.

Sincerely,

Lon Kissinger

3615 Carr Place North

Seattle, WA 98103

206-930-8941

## ADUEIS

---

**From:** Philip K <klatte@gmail.com>  
**Sent:** Thursday, November 16, 2017 11:20 AM  
**To:** ADUEIS; Klatte, Philip  
**Subject:** Accessory Dwelling Units Environmental Impact Statement -- Scoping Comments

The alternatives don't really look at many factors or options for promoting D/ADUs, for example:

- eliminate Seattle-specific landlord-tenant laws for D/ADUs --> it is significantly more onerous to be a landlord in Seattle than in Washington in general, and that's particularly frightening for small and unsophisticated landlords (like people building ADU's onto/in their houses)
- relax non-health-and-safety code restrictions for ADU's (not DADU's) -- for example ceiling and door height for basements
- open up the affordable housing funds from the Seattle Housing Authority (and/or other funds) to provide loans to homeowners to build D/ADU's
- rather than limiting D/ADU's only to homeowners or to non-homeowners (as alternatives), look at allowing them only to homeowners, but allow non-home-owners to rent them after a sale or the homeowner moves out (after some period of living there)
- examine codifying an exemption for off-street parking when providing it is too onerous, rather than just eliminating the requirement
- streamline permitting for DADU's -- for example, have sets of pre-approved plans and people who assist with submissions
- committing to working with King County to try to reduce sewer hookup fees for DADUs, when no new physical hookup is actually needed

For impacts, it might be worth analyzing:

- for style and fitting into the neighborhood, is there natural selection for a design that is less out-of-place or onerous on neighbors if only owner-occupants can make D/AUD's
- are owner-occupants less likely to want to cut down every last tree in their quest for building rental space?
- analyze the impact of not providing parking not just on parking, but also on navigating the streets -- in many urban villages, and just outside them, only one car can pass through at a time, unless there is a pull out space, somewhere in the block -- filling up *every* parking space limits those pull outs, and creates clusters of cars pointed at each other with no space to pass (and if there is more than one in a direction, backing up is tricky)
- examine the impact of where rental profits flow between allowing non-owner-occupants to build versus only owner-occupants: does it concentrate wealth more and disproportionately affect certain populations?

**ADUEIS**

---

**From:** Patti Loesche <patti.loesche@gmail.com>  
**Sent:** Thursday, November 16, 2017 11:32 AM  
**To:** ADUEIS  
**Subject:** Comments on ADU/DADU EIS (Loesche)

To ADU EIS reviewers,

Attached are 15 comments and two general recommendations in response to the Scoping Period for the ADU/DADU EIS ([www.seattle.gov/council/adu-eis](http://www.seattle.gov/council/adu-eis)).

I have organized my comments around the scoping considerations and provided brief context. Comments follow each Scoping category (labeled as "Comment 1", "Comment 2", etc.).

Patricia Loesche  
 4317 2nd Ave NW  
 Seattle WA 98107  
 206 784 7958

-----  
 I. Land Use: Compatibility of alternatives with Single Family zoning

> The City's analysis of impacts of Alternative 2 extrapolated from studies of Portland and Vancouver BC, neither of which allows zoning for both AADU and DADU on a SF lot.

Comment 1. The effects of tripling the number of dwellings on a SF lot are undocumented. Specifically document these effects, both in the short run and for the life of the rezoning.

II. Land Use: Potential elimination of existing housing

> Alternative 2 would increase lot value, greatly increasing the incentive for investors to buy SF property and convert it to triple dwellings, dispossessing many existing occupants, especially renters, and eliminate existing affordable housing.

Comment 2. How, specifically, would Alternative 2 protect the elimination of existing affordable housing?

III. Land Use: Potential impacts on vegetation, tree canopy, and environmentally critical areas (ECAs).

> The height, bulk, and scale of construction proposed by Alternative 2 will (a) eliminate vegetation and tree canopy, (b), increase hardscape, (c) decrease shade in summer, light in winter, oxygen, and beauty, (d) increase the threat of flooding and polluted runoff, thus threatening aquatic life, including salmon.

Comment 3. What are the specific effects of Alternative 2 on the potential for increased flooding and runoff and harm to aquatic wildlife?

Comment 4. How would the City mitigate effects of Alternative 2 to protect trees, vegetation and ECAs?

Comment 5. The EIS must analyze impacts of Alternative 2 to Seattle's designated Tree Canopy and stated goals for 30% coverage by 2037.

Comment 6. Based on increased density proposed by Alternate 2, the EIS must require enforcing tree protection rules for proposed ADU developments in accordance with similar provisions for Lowrise Zones.

IV. Land Use: Owner occupancy. Alternative 2 would eliminate owner occupancy of up to three dwellings on a single-family lot.

Comment 7. If owner occupancy is not required, the EIS must require that tenants will still be accountable to property and neighborhood regarding noise, privacy, and sanitation.

Comment 8. What percentage of existing ADUs are rentals? What % of proposed ADUs are expected to be rentals under Alternative 2?

V. Housing & Socioeconomics: Housing affordability, assessment of socioeconomic characteristics, demographic change, and potential displacement:

> Under Alternative 2, (a) property value will increase, (b) rents will increase because of the increased allowable structure size vs. Alternative 1, and the availability of affordable housing will decrease. Lower-income populations are most vulnerable to losing affordable housing.

Comment 9. Where are these people supposed to go? The EIS must specify how, specifically, Alternative 2 would protect vulnerable populations from losing existing housing and provide future access to affordable housing.

VI. Aesthetics: Potential impacts to visual character

Comment 10. Provide a detailed, real-life, in-context scenario of how tripling density in a single-family neighborhood would look like.

VII. Qualitative review of shadowing, privacy, scale, and compatibility with single-family development

> The proposed scale of new dwellings under Alternative 2 would vastly reduce open space, further shade land and structures, increase noise (from humans, animals, vehicles, and amplification), and invade visual and auditory privacy.

Comment 11. The EIS must document effects of increasing height and bulk limits on shadow, privacy, crowding, and scale and establish acceptable boundaries for each variable.

Comment 12. The EIS must analyze the demand for additional public park space in residential areas in proportion to the extent that open space is replaced by ADU on single-family lots.

VIII. Transportation: Potential impacts to availability of on-street parking, Assessment of car ownership rates, transit, and circulation patterns

> The City's initial proposal falsely minimized effects of parking with increased ADU/DADU density by comparing projected impacts from TWO ADUs, as proposed for Seattle, to impacts from ONE ADU, as exist in Vancouver BC and Portland. An objective and accurate traffic study is needed.

> Seattle is a hilly city. On-street parking on both sides of a neighborhood street creates one lane for traffic. In hilly neighborhoods, this means poor sightlines to oncoming traffic, as is already occurring under Alternative 1.

Comment 13. The EIS must require an accurate traffic study to document why Alternative 2 will not impact on-street parking.

Comment 14. The EIS must document, with specific examples from hilly neighborhoods, how to promote safety and improve sightlines forced by increased traffic density resulting from Alternative 2.

#### IX. Public Services & Utilities

> Public service infrastructure for SF neighborhoods was designed for single-family homes on single-family lots. Police, fire, and emergency services are already overextended. Our existing sewage treatment facilities cannot withstand surges in demand. Water isn't an infinite resource. Tripling density (Alternative 2) is therefore more dangerous (i.e. support services 1/3 as available) and puts unreasonable demands on utility services.

Comment 15. The EIS must require the City to increase public service infrastructure before tripling demand for public services for existing single-family neighborhoods.

#### General Recommendations

I. Retain ADU/DADU Alternative 1.

II. Continue to evaluate existing ADU/DADU guidelines (2010; Alternative 1) to assess the effects of these guidelines for the life of the project. It is premature to relax ADU/DADU guidelines even further (i.e. Alternative 2). The existing ADU/DADU zoning guidelines (Alternative 1) have not been in place long enough to assess their long-term environmental effects.

**ADUEIS**

---

**From:** Hugh Geenen <hugh.geenen@yahoo.com>  
**Sent:** Thursday, November 16, 2017 11:38 AM  
**To:** ADUEIS  
**Cc:** Johnson, Rob; O'Brien, Mike; Herbold, Lisa; Gonzalez, Lorena  
**Subject:** Accessory Dwelling Units EIS: Scoping Comments

Email address: hugh.geenen@yahoo.com

Name: Hugh Geenen

Are there additional topics or concerns that you would like to see addressed in this EIS?

I come to address this EIS because of my training in sustainability and resiliency, that everything in my recent experience tells me that the most important thing I can do to make change on this planet is to dedicate my energies towards advocating for urban density and transit-oriented development. We have a housing shortage, a climate crisis, and an increasingly inequitable city. Allowing more dwelling options, all sizes and price points, throughout the 2/3rds of the city untouched by this rezone, is a great strategy to combat all three.

They are a perfect size for our smaller households (2.1 people according to the latest demographics) and are relatively more affordable. An investment in DADUs is a powerful disincentive to future tear downs and the greater environmental, visual and noise impact of out-of-scale McMansions.

Do you have other comments or suggestions related to the scope of the EIS?

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary.
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

- Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC).
- Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.
- Off-the-shelf housing plans pre-approved to shorten and lower permitting and design costs and expedite housing starts.
- Lower connection fees for sewer etc. for secondary structures on same tax parcel with existing connection.

## ADUEIS

---

**From:** Gregory Hill <greg.hill@IBIGroup.com>  
**Sent:** Thursday, November 16, 2017 12:27 PM  
**To:** ADUEIS  
**Subject:** ADU EIS

The EIS should offer a summary of the economic impacts to housing as a result of the changes.

1. What is the tax impacts projected for dwellings based on the new potential development opportunities?
2. What is the cost impact to home purchasing based in creating a non-owner rental market for three units per lot, versus one unit today (an ADU or a DADU)?
3. Past EIS documents have included graphic aids to help explain the impacts of revised development standards. A careful review of the previous literature by trained professionals shows potentially significant differences in lot coverage are possible, from current conditions, when greater lot coverage is allowed, combined with smaller lot sizes. The EIS should provide a clear set of graphics to explain this to laypersons.
4. Provide alternatives that have dramatically different outcomes by more dramatically limiting lot coverage, requiring owner occupancy, and by requiring more parking and greater dimensions of open space.

Gregory Hill ARCHITECT, AIA

Associate

## ADUEIS

---

**From:** Mary Elayne <medunphy@comcast.net>  
**Sent:** Thursday, November 16, 2017 12:35 PM  
**To:** ADUEIS  
**Cc:** Kaplan, Martin; Ann Prezyna; Leman, Chris  
**Subject:** Support for QACC Scoping Comments

I am writing in support of the comprehensive ADU-EIS Scoping Comments of the Queen Anne Community Council submitted November 12, 2017.

I am a resident of the Eastlake neighborhood, which has different zoning standards but where we face the same rapid construction/growth issues as the Queen Anne community.

In particular I endorse the QACC's Alternative 3 for #5 Maximum Square Footage and the differences in utility infrastructure among newer and older neighborhoods, as well as the Alternative 3 comments for #2 Parking, #3 Owner Occupancy, #4 Minimum Lot Size for a DADU, and #10 Roof Features.

Please accept these alternatives so we can retain the meaning of Livable Seattle!

Thank you.

Mary Elayne Dunphy  
2009 Franklin Ave. E.  
Seattle, WA 98122

**ADUEIS**

---

**From:** Robert Olander <robertolander@comcast.net>  
**Sent:** Thursday, November 16, 2017 12:40 PM  
**To:** ADUEIS  
**Cc:** Paul Willumson; Katherine and Ted Bragdon  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

Please consider the following for scoping review of the above referenced EIS.

1. What is the demonstrated need for increasing the number of EDUs per lot. How many have been constructed under current regulations and what need is there to increase the number per lot.
2. Lack of parking is currently a significant issue in neighborhoods. At full build out what would be the parking impact of the proposed changes. What alternatives and mitigation's are available.
3. What are the traffic impacts and proposed mitigations.
4. What are the impacts on impervious surface and increased urban runoff. How will this impact the capacity of the current plans for the combined sewage storm water project proposed in the Ballard and north Seattle area.
5. What is the ultimate build out impact on public services such as police, fire, EMS, water, sewer, solid waste, etc.
6. Alternatives as outlined by Martin Kaplan of the Queen Anne Community Council should be examined in the EIS.
7. Impact on tree canopy and air quality should be examined.
8. Compatibility with existing neighborhoods and mitigation measures should be examined.
9. The impacts of changing from owner occupancy of the lot to allowing EDUs on absentee owned lots should be thoroughly examined. What incentive will this provide to the commercialization of single family neighborhoods. Developers will have increased incentives to buy us older less expensive housing stock, raze older homes and build expensive rentals and EDUs, actually lessening the availability of lower cost housing.
10. Most urban Seattle lots are 5,000 sq ft or smaller and could not accommodate two or even one EDU. The EIS should examine larger minimum lot sizes that might be able to accommodate EDUs.

Thank you for your consideration.

Robert Olander  
Tracy Antley Olander  
Wallingford

Sent from my iPad

## ADUEIS

---

**From:** Liora Halperin <liora.halperin@gmail.com>  
**Sent:** Thursday, November 16, 2017 12:40 PM  
**To:** ADUEIS  
**Subject:** Re: Accessory Dwelling Units Environmental Impact Statement

Thanks, just to make clear--I like the current regulation that the home be owner occupied and wouldn't want to see that eliminated (but changing the other things is fine with me and a good idea).

On Thu, Nov 16, 2017 at 12:38 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Liora,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Liora Halperin [mailto:[liora.halperin@gmail.com](mailto:liora.halperin@gmail.com)]  
**Sent:** Wednesday, November 15, 2017 7:49 PM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

I like all the proposed changes to the ADU regulations EXCEPT the requirement for the Home to be owner occupied. Take out the owner and you just have a multi-unit rental at which point the whole thing might as well be zoned for multi family, which isn't what the city is proposing.

**ADUEIS**

---

**From:** Jan Weldin <janweldin60@gmail.com>  
**Sent:** Thursday, November 16, 2017 12:55 PM  
**To:** ADUEIS  
**Subject:** Proposed ADUEIS

The rationale for allowing ADUs and DADUs on single family lots without owner occupancy makes no sense. Of course, it will have impacts on neighborhoods and the entire city. I understand the need for more housing in the city, but this proposal is one that threatens to drastically change the quality of life for everyone in the city. A single family lot could be one with an ADU or even a DADU, but if you allow both of these it is by no means any longer a Single Family Lot. You would in essence be allowing the whole city to change where every SF lot could become a 3 family lot. With the potential for profits by developers, it will become even more difficult for individuals and single families to purchase a home in the city.

By not requiring owner occupancy on single family lots, the building on these lots will certainly be by developers who will not be involved in the maintenance of the properties. If owner occupancy is required for 6 months during the first year only, it is certain that developers will find a way to work around that and then never be seen again. There is the potential for some of these units to become airbnbs which means a steady stream of strangers in and out of one address. There is no way that the city will pay for an enforcement program to ensure that owners live on site or don't. **It will be a giveaway of the city to developers.**

I know of several houses in my neighborhood where there are ADUs and also some DADUs. The owners live in on site. For the most part, these fit nicely into the neighborhood. The properties are well cared for because the owners live there and they care.

**I vehemently oppose allowing both ADUs and DADUs on a so called Single Family Lot . I also vehemently oppose lifting the non-owner occupancy requirement.**

**I am asking you in the strongest terms to not allow 3 dwelling units on one lot and to require owner occupancy.**

**I ask that you consider the quality of life for Seattle residents. We have been a wonderful city of neighborhoods where we know our neighbors and watch out for each other. This benefits the city and has part of what has made Seattle special. Don't sell us out.**

Thank you

Jan Weldin  
Phinney Ridge

## ADUEIS

---

**From:** mike eliason <15kwhm2a@gmail.com>  
**Sent:** Thursday, November 16, 2017 12:57 PM  
**To:** ADUEIS  
**Subject:** EIS scoping comments

Dear Aly,

Thanks to the city for all your hard work on trying to make the proliferation of backyard cottages and ADUs more attainable for families like mine that are effectively priced out. I am hopeful the city will move in the direction that is just and reduces inequitable legacy of Seattle's single family zoning.

At a minimum, we should adopt Alternative 2. But the housing shortage is so severe, we need to move beyond that. We need more housing of all typologies so Seattle stays a mix of generations, incomes, races. At a minimum, we must repeal classist regulations like parking requirements, owner occupancy requirements, disallowing both an ADU and a DADU, increasing the minimum square footage so that families like mine - middle class, union jobs, with young kids - can afford to live in Seattle.

Additional scoping comments:

1. Show how much worse displacement, sprawl, and environmental degradation will be if we don't allow more urban infill housing
2. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people. Single Family Zoning is classist and the nomenclature is used by those who oppose poor people living near them.
3. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.
4. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
5. Housing Opportunity Overlay. Create a ring overlay within 15 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary
6. Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
7. Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)
8. Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.
9. Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit

properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

10. Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

11. Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

It is tragic enough that nearly three quarters of the parcels where housing is legal in Seattle specifically exclude multifamily housing - we should be doing all we can to reduce the legacy of exclusion that is exacerbating displacement and exploding rents and housing costs today.

Regards,

Mike Eliason,

Fremont father, renter, and housing advocate.

**ADUEIS**

---

**From:** Matt Hutchins <matt@castarchitecture.com>  
**Sent:** Thursday, November 16, 2017 1:28 PM  
**To:** ADUEIS  
**Subject:** Re: 508 ACCESSORY DWELLING SUPPORTERS say we can do MOAR to support housing options, affordability and greener infill development.

will you be posting the whole pdf with all the signatories and their comments?

you can pull out our previous version, since we more than doubled the number of supporters! Thanks and have a good day!

On Thu, Nov 16, 2017 at 12:46 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Thank you, Matt.

-Aly

**From:** Matt Hutchins [mailto:[matt@castarchitecture.com](mailto:matt@castarchitecture.com)]  
**Sent:** Thursday, November 16, 2017 9:52 AM  
**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>; Gonzalez, Lorena <[Lorena.Gonzalez@seattle.gov](mailto:Lorena.Gonzalez@seattle.gov)>; Burgess, Tim <[Tim.Burgess@Seattle.gov](mailto:Tim.Burgess@Seattle.gov)>; Sawant, Kshama <[Kshama.Sawant@seattle.gov](mailto:Kshama.Sawant@seattle.gov)>; Juarez, Debora <[Debora.Juarez@seattle.gov](mailto:Debora.Juarez@seattle.gov)>; Bagshaw, Sally <[Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov)>; Harris-Talley, Kirsten <[Kirsten.HarrisTalley@seattle.gov](mailto:Kirsten.HarrisTalley@seattle.gov)>; O'Brien, Mike <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>; Harrell, Bruce <[Bruce.Harrell@seattle.gov](mailto:Bruce.Harrell@seattle.gov)>; Nyland, Kathy <[Kathy.Nyland@seattle.gov](mailto:Kathy.Nyland@seattle.gov)>; Johnson, Rob <[Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov)>; Herbold, Lisa <[Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov)>; Assefa, Samuel <[Samuel.Assefa@seattle.gov](mailto:Samuel.Assefa@seattle.gov)>; Durkan, Jenny <[Jenny.Durkan@seattle.gov](mailto:Jenny.Durkan@seattle.gov)>  
**Subject:** 508 ACCESSORY DWELLING SUPPORTERS say we can do MOAR to support housing options, affordability and greener infill development.

Over the last few months there have been intense online discussions about backyard cottages in conjunction with the ADU EIS. Recently a new group, **MOAR**, formed and met in person to brainstorm the many ways we could make backyard cottages more frequent, and in turn, the city more affordable.

*MOAR (More Options for Accessory Residences) is a group of citizens concerned with the future of the city, housing availability and affordability. We have diverse backgrounds, experiences and housing situations, but we're all Seattleites who want our city to allow more options for accessory residences. For us, our neighbors, and future generations.*

We put our thoughts and experiences together into a petition, "[10 Ideas to address Seattle's housing shortage](#)". It is being submitted as an official response to the request for public comment to the Environmental Impact Statement for the Accessory Dwelling Unit.

I've attached the petition with more that **500 supporters** we're found in just over 3 weeks.

If you visit the petition website ([link](#)) you will see the fantastic reasons people have given for supporting MOAR's ideas for new housing options.

We ask that you continue the difficult work to educate Seattelites about the important connections between housing choice, affordability and climate justice.

We'll be hosting some informal monthly meetups to share stories and policy ideas with homeowners, renters, realtors, builders, mortgage brokers, enviromentalists and groups like the AARP.

If you have any questions for the group, please feel free to contact me.

--

Matt Hutchins

[206 501 7051](tel:2065017051)

--

Matt Hutchins, AIA  
Principal, CAST  
206.256.9886  
[www.CASTarchitecture.com](http://www.CASTarchitecture.com)

**ADUEIS**

---

**From:** Ben Low <peggynben@comcast.net>  
**Sent:** Thursday, November 16, 2017 2:11 PM  
**To:** ADUEIS  
**Cc:** Kaplan, Martin  
**Subject:** Seattle Single Family Upzone

My wife, Peggy Riehle, and I are writing to give our whole-hearted support to the letter that the Queen Anne Community Council's Land Use Review Committee has submitted to you on November 11, 2017 by Marty Kaplan.

Higher density needs to be introduced to the city on a more gradual basis, with particular regard to the character and infrastructure profile of city neighborhoods, opposed to a wholesale tsunami of unchecked density development. What you are proposing to do, in our estimation, is create a 2017 version of a Klondike gold rush for developers, notably corporate non-resident ones, who will have free license to over-ride the provision of accompanying infrastructure, yes—including some parking—that will ultimately damage the city's long-standing livability. Not every neighborhood can, or should be rendered into another copy of downtown or Capitol Hill.

Please reconsider the proposal to turn Seattle into a soul-less real estate free-for-all in the name of "high density." Grow the city in phases and with close attention to the unique neighborhoods and their geography, which have made Seattle such an admirable city.

Sincerely,

Benson Low & Peggy Riehle  
1522 4<sup>th</sup> Ave W  
Seattle WA 98119

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:34 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The objectives in the Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) for the proposed action should be:

- to increase the number of affordable housing units,
- to increase the number of family-size housing units,
- to preserve the tree canopy and green-space, and
- to require development compatible with existing single-family housing.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** James Borrow <jim@jimborrow.com>  
**Sent:** Thursday, November 16, 2017 2:39 PM  
**To:** ADUEIS  
**Subject:** Comments regarding the ADU/Backyard cottage (AADU/DADU) EIS

To whom it may concern,

Thank you for extending the comment period on this important issue to Nov. 16th.

Since changes to current codes regarding AADU and DADU construction will affect Single Family dwelling in all Seattle neighborhoods, it is important that all potential impacts be assessed as thoroughly as possible.

Prior to sending you this email I reviewed all the comments listed on your website and will begin my point by point analysis of the two alternatives you have presented by agreeing with many of the emails you received by saying that listing only alternatives #1 & #2 is inadequate. As noted by one respondent, "Having just two alternatives would put in an untenable position those individuals who support more affordable housing, but oppose removing all restraints on developer exploitation of single family neighborhoods." As noted on your website, alternative #1 = No Action, alternative #2 = changes in code as listed on the website.

1. **Number of ADUs allowed on a single-family lot: Favor alternative #1**, especially for small lots, thought might agree to AADU & over garage DADU on larger lots.
2. **Parking: Favor alternative #1** based on experience in our neighborhood where we have single family homes and a large apartment house. Could agree to dropping the parking requirement if robust transit was within easy walking distance or the neighborhood had large lots with a lot of available street parking. This requirement needs to be assessed on a neighborhood by neighborhood basis. I think it is especially important to require off street parking in those neighborhoods with undeveloped streets (no sidewalks, curbs and with ditches rather than storm sewers and drains. One example would be in the Haller Lake and what I would describe as the North Crown Hill area. AADU and DADU development would bring an increased number of cars parked on the street and pedestrians would be in greater danger than they now are, especially at night and rainy weather.
3. **Owner-occupancy: Favor alternative #1**. Dropping the owner-occupancy requirement will trigger a speculator/developer land rush which will drive up prices of single family homes, further pricing those who want to buy a home out of the market and forcing them to look for homes outside the city. It will discourage families from staying in Seattle and will further shift Seattle into a city of renters rather than home owners. More rapidly increasing values will further increase taxes and force more seniors to sell and move.
4. **Minimum lot size for a DADU: Favor alternative #1**. Anything less than 4000 sq. ft. is too small for a DADU; even a DADU built to current code would be out of proportion to the size of the lot and risks negatively impacting neighboring lots, especially the ability of adjoining lot owners to enjoy their back yards, etc. relatively undisturbed. The number of lots in Seattle that would be impacted by maintaining a 4000 sq. ft. minimum is small and would have little impact on the potential number of DADUs that could be built.
5. **Maximum square footage: Favor alternative #2 scaled to the size of the lot**. A 5000 sq. foot lot can adequately handle larger AADUs and DADUs exclusive of garage and storage; a 4000 square foot lot cannot handle a garage and DADU. For AADUs, I would consider increasing the allowable square footage to 1100-1200 sq. ft. in a home on a larger lot. This would encourage the building of family size units and could be retrofitted in some of the large, old homes one sees in neighborhoods such as North Capitol Hill or new homes that might be built on underutilized larger lots in other neighborhoods.

6. **Maximum height: Favor alternative #1.** Increasing height negatively impacts adjoining neighbors, not only in the enjoyment of their homes and backyards, but also may negatively impact already installed or the potential installations of solar panels and vegetable gardens, plantings because of shade.
7. **Lot coverage limit: No choice allowed for #1 or #2 here. However, I do have an issue with allowable coverage increasing from 35% for a 5000 sq. ft. lot to 40% for a 4000 sq. ft. lot and to 46.3 % for a 3200 sq. ft. lot (if 3200 sq. ft. is allowed).** This gets back to my point concerning #4, minimum lot size: The smaller the lot, the greater the impact the structure has on adjoining lots.
8. **Rear yard coverage limit: Favor alternative 1, but I would not allow separate DADUs and garages on 4000 sq. ft. lots. On those lots DADUs should be over garage structures.**
9. **Location of entries: No preference of either alternative 1 or 2, though I think it is important that the DADU entrance not be immediately facing the back door, kitchen, (or especially) bathroom or bedroom window(s) of adjacent homes. A neighbor's privacy trumps the building of a new structure in this situation.**
10. **Roof features: Favor alternative #1.** Dormers are used here as an example. By most everyone's definition, dormers don't exceed the peak height of a roof, so this looks like some weird potential loophole in the code to me.
11. **Household size: Favor alternative #1.** Eight unrelated adults in a home per current code is generous. Allowing up to 12 with AADUs and DADUs in place is excessive, not only in the potential for noise and general disruption of the neighborhood, but also in terms of added, excessive stress on infrastructure such as sewer, water, parking (let's be realistic, in most Seattle neighborhoods, cars are necessary and will continue to proliferate as our population grows since we are so far behind in building an adequate transportation system).
12. **MHA requirements: If absentee ownership of homes with ADUs is allowed, the MHA requirement of a per sq. ft. fee should apply to those homes, but without the perks such as added height, etc. that are given to the developers of multifamily housing. Absentee owners are for-profit entities, who build to add properties to their portfolios or developers who will buy homes and either add ADUs or tear them down and max them out with ADUs, then flip them to absentee entities. This is far different from an owner who wants to build an ADU for added income or for family members.**
13. **Rental Registration & Inspection Ordinance (RRIO): Agree that units should be registered and inspected (within reason and without the development of an unwieldy bureaucracy.**

Accessory Dwelling Units EIS: Proposed Scope: I agree with the scope of the review as outlined on the website, but especially want to emphasize how important the impact of an increased number of ADUs will have on our aging sanitary and storm sewer systems and how much tree canopy potentially will be lost.

I also want to mention several items I think should also be considered in your EIS and scoping process:

1. **Why not allow cottage projects on larger lots?** One participant in your survey lives in Ravenna Cottages, built in 2001 as a demonstration project by Threshold Housing. There are nine, 900 sq. ft. cottages around a central courtyard, each with a garage and generous storage. Another cottage project is in my neighborhood on SW Carroll St, near its intersection with Beach Dr. SW....a lovely set of cottages, certainly much more interesting and in fit with the neighborhood than the boxy, Hardee panel 4-plexes and 6 packs that have been built nearby. So, why aren't nicely done cottage projects in the mix?
2. **Why not streamline the application process for owner-occupied ADUs as is done in Portland?**
3. **Why does it cost a reported \$15,000 for a DADU sewer hookup? Why can't a DADU hookup to the existing house sewer, especially since under current code, in square footage, a DADU would add no more load to the system than an AADU or the addition of another floor/bathroom to the existing home?**
4. **Do not allow RVs or tiny houses on trailers/wheels to qualify as DADUs.**
5. **ADUs should not be allowed as short term rentals such as Air BnB. Especially if buildings are absentee-owned.** Single family neighborhoods will be severely strained by these changes which were initiated to help solve a housing crisis and the solution should not be promulgated to provide a high return rental stream from visitors.

**6. There is no one-size-fits-all solution. EIS and code should examine local neighborhood conditions with neighborhood input.**

Lastly, please remember that we are currently living in an aberration regarding real estate values and affordability. Seattle has been, and will continue to be a city of cycles...boom and bust to an extent. We should look the ADU proposal in the context of the building cycle as a whole, the number of new apartments built and currently in the pipeline and historically look at what building and values look like when normalized over time. I think it would be tragic irreversibly change the character of Seattle single family neighborhoods. We don't want families rushing to the suburbs because the neighborhoods and homes that in part brought them to Seattle have irrevocably changed, but not for the better.

Sincerely,

James & Janice Borrow  
6626 SW Admiral Way  
Seattle Council District 1

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:44 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps the existing owner-occupancy requirements, while removing the parking requirements and changing the development standards for size and location of DADUs.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:46 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps the existing owner-occupancy requirements and parking requirements, while changing the development standards for size and location of DADUs.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:46 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps the existing owner-occupancy requirements and parking requirements and ADU size requirements, while changing the requirements for lot size and location of DADUs.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:47 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps the existing owner-occupancy requirements and parking requirements and ADU lot location requirements, while changing the requirements for size of ADUs.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:48 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps existing requirements for lots under 10000 SF, while changing the requirements for larger lots.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:49 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps existing ADU requirements, with the City financing the King County Sewer Capacity fee for a DADU in exchange for that unit being an affordable rental housing unit in the City's Housing program.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:50 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps existing ADU requirements, with the City financing ADU “in-law apartment” redevelopment in exchange for those units being affordable rental housing units in the City’s Housing program.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:51 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study an alternative that keeps existing ADU requirements, with the City developing neighborhood pre-approved plans for DADUs on different lot sizes.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:51 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of real-estate speculation in ADU rentals on affordable housing.

Submitted,  
Frank Fay

**ADUEIS**

---

**From:** Cecilia Matta <ctmatta@gmail.com>  
**Sent:** Thursday, November 16, 2017 2:52 PM  
**To:** ADUEIS  
**Subject:** ADU Scoping

Please proceed with caution as you try to increase density in single family neighborhoods. Our neighborhood has already suffered noise, litter and privacy issues as some residents have treated their homes as "rooming houses".

Keep ADU alternative #1.

- Parking is already an issue in our neighborhoods, creating safety issues on our narrow streets for emergency vehicles, kids, senior accessibility and normal everyday driving.
- Several households on our block already park more vehicles on the street than the # of licensed drivers in the household.
- Eliminating the parking requirement for ADUs is short-sighted, and will just add to street congestion.
- Lose the (erroneous) assumption that ADU dwellers won't bring cars. There will be more cars as you ease "rooming houses" into single-family neighborhoods.
- We need to maintain green or unpaved space on existing lots, so we can breathe *and* support surface water management. Don't pave paradise and put up ADUs.

Thank you for respecting and preserving privacy, quiet and safety in our single family neighborhoods.  
*Cecilia Matta*

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:52 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of AirBnB type short-term rentals for ADUs on affordable housing.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:53 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on tree canopy, green space, play spaces, and recreation.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:54 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on parking for neighborhoods including residents and small businesses.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:54 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on sewers, sewage treatment, and water-quality.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:55 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on public services including fire and police.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:56 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on utilities including water and electricity.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:58 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on transportation including traffic congestion, and the cost and adequacy and availability of public transit.

Submitted,  
Frank Fay

## ADUEIS

---

**From:** Frank Fay <f.fay@ieee.org>  
**Sent:** Thursday, November 16, 2017 2:59 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

The Accessory Dwelling Units (ADU) Environmental Impact Statement (EIS) should study the impacts of the proposals on schools including overcrowding and playfield space.

Submitted,  
Frank Fay

**ADUEIS**

---

**From:** Carl Guess <carlg@paperbarkcommunications.com>  
**Sent:** Thursday, November 16, 2017 2:59 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units Environmental Impact Statement

Dear OCPD -

Thanks for the chance to comment on the scoping of the ADU/DADU proposal. Mine are as below. Thanks and best, Carl Guess

- The EIS should study an alternative that keeps the parking requirements and ADU size requirements
- The EIS should study the City financing the King County Sewer Capacity fee for a ADU/DADU in exchange for that unit being an affordable rental housing unit in the City's Housing program.
- The EIS should study an alternative that keeps existing ADU requirements, with the City financing ADU "in-law apartment" redevelopment in exchange for those units being affordable rental housing units in the City's Housing program.
- The EIS should study an alternative that keeps existing ADU requirements, with the City developing neighborhood pre-approved plans for DADUs on different lot sizes.
- The EIS should study the impacts of AirBnB type short-term rentals for ADUs on affordable housing.
- The EIS should study the impacts of the proposals on tree canopy, green space, play spaces, and recreation.
- The EIS should study the impacts of the proposals on parking for neighborhoods including residents and small businesses.
- The EIS should study the impacts of the proposals on sewers, sewage treatment, and water-quality.
- The EIS should study the impacts of the proposals on public services including fire and police.
- The EIS should study the impacts of the proposals on utilities including water and electricity.
- The EIS should study the impacts of the proposals on transportation including traffic congestion, and the adequacy and availability and cost of public transit.
- The EIS should study the impacts of the proposals on schools including overcrowding and playfield space.

## ADUEIS

---

**From:** Michael Oxman <michaeloxman@comcast.net>  
**Sent:** Thursday, November 16, 2017 3:15 PM  
**To:** ADUEIS  
**Subject:** Comment on EIS of ADU proposal

Dear Seattle City Planner,

The Urban Forestry Commission wrote a letter about the ADU requirement for off street parking on single family lots causing trees to be removed.

A 10' X 20' area, plus a clear zone for concrete forms to pour slabs for 2 cars would require removal of trees from an area of about 200 square feet.

By writing that the yard would be better off with the requirement for off street parking eliminated from the draft proposal, the UFC was forced to agree that the 800 square foot area of the ADU is ok.

I don't believe the commission feels that there are adequate trees to spare to build the 1,000 sq' ADU, yet they were forced into compromising their views by chiming in on the off street parking issue.

This is an example of how the development mentality seeks to manipulate and relax the regulations protecting trees by emphasizing conflicting values in our code that seek additional housing that displaces trees unnecessarily.

Thanks for listening to my comment.

Michael Oxman

ISA Certified Arborist #PN-0756A

[www.treedr.com](http://www.treedr.com)

(206) 949-8733

**ADUEIS**

---

**From:** Westing, Karen  
**Sent:** Thursday, November 16, 2017 3:23 PM  
**To:** Pennucci, Aly  
**Subject:** FW: Tweet by The Urbanist on Twitter

Hi Aly, I'm not exactly certain who is lead on this but our SDOT Digital Strategist asked me to forward this tweet/comment onto the ADU team while she is out of office. I saw your contact info on the project page. Thanks for your help in getting it to the correct people!

Karen

---

**From:** Clark, Jeanne  
**Sent:** Wednesday, November 15, 2017 11:05 PM  
**To:** Westing, Karen <Karen.Westing@seattle.gov>  
**Subject:** Tweet by The Urbanist on Twitter

Can you share this comment with the team working on the Accessory Dwelling Unit comment period?



**The Urbanist (@UrbanistOrg)**

[11/14/17, 10:19 AM](#)

[@seattledot](#) Here's some avenues to explore for accessory dwelling unit comments:  
[theurbanist.org/2017/11/01/sub...](http://theurbanist.org/2017/11/01/sub...)

[Download](#) the Twitter app

Sent from my iPhone

**ADUEIS**

---

**From:** Tony <tonyroth@comcast.net>  
**Sent:** Thursday, November 16, 2017 3:32 PM  
**To:** O'Brien, Mike; Pennucci, Aly; Freeman, Ketil; Burgess, Tim; Bagshaw, Sally; Gonzalez, Lorena; Harris-Talley, Kirsten; Juarez, Debora; Sawant, Kshama  
**Subject:** Changes to Auxillary Dwelling Unit and Detached Auxillary Dwelling Unit Zoning Requirements

I ask that the EIS contain a third alternative in addition to “no action” and the sweeping Seattle Code amendments contained in the proposed legislation. First, it is common--and useful in decision-making--for an EIS to contain three alternatives.

The City is likely to adopt some changes to current ADU policies. As currently proposed, the EIS presents decision-makers with the binary option of radical change or nothing. This seems to presume that the City Council will adopt the current proposal regardless of its consequences. Decision-makers and the public should instead be given the benefit of a fair range of options, and a full analysis of their consequences. Anything less will be inadequate State Code to guide informed decision-making.

I ask that the EIS analyze the alternatives in light of concurrency issues under the State Growth Management Act. Expansion of the City’s infrastructure lags far behind its rapid population growth. The proposed ADU legislation would certainly worsen this problem. I ask that the EIS consider the alternatives’ effect on schools, parks and other public facilities, roads and traffic, public transit, and utility infrastructure. The EIS also should analyze the alternatives’ effect on tree cover and carbon-dioxide capture.

I believe that a third alternative in the EIS should outline a proposal that:

- Makes changes dependent upon the circumstances of individual neighborhoods, rather than imposing a “cookie-cutter” approach that fails to recognize the unique qualities and circumstances of each. For example, parking requirements should reflect each neighborhood’s needs and situation. The parking situation on View Ridge, for example, is completely different that on Capitol Hill. Average lot sizes also vary wildly among neighborhoods. While a 10,000 square-foot lot may be able to accommodate three dwelling units under some circumstances, a 3,500 square foot lot certainly can’t do so.
- Makes changes incrementally, so that the City can evaluate their effect before imposing them wholesale throughout the City. For example, the City might consider limiting the total number of ADU/DADU combinations in each area until the effects of the change become apparent.
- Retains the owner-occupancy requirement for all ADUS. In this respect, Council Member Mike O’Brien has told members of the Phinney Ridge Community Council on at least two occasions that he did not intend to effectively eliminate the owner-occupancy requirement, as the current legislation would do. Owner-occupancy is perhaps the single most important element in ensuring that any changes to ADU regulations do not worsen speculative development by absentee landlords.
- Maintains the current 4,000 square-foot minimum lot size for DADUs.
- Maintains current lot-coverage and size regulations for DADUs.
- Contains meaningful limitations on the use of ADUs/DADUs as short-term rentals, to ensure that new development is used as housing rather than transient accommodation.

I expect you, as the representatives of the people of Seattle and NOT reacting in a knee-jerk fashion to housing needs for all Seattle’s citizens, to seriously consider the above. Please respond to my request, along with your reasoning for the positions you adopt on these proposed changes.

## ADUEIS

---

**From:** Susan Ingham <sfingham@yahoo.com>  
**Sent:** Thursday, November 16, 2017 3:44 PM  
**To:** ADUEIS  
**Subject:** Comments on EIS for ADUs

Please be sure to study carefully the effects of removing the requirement of home ownership - it would be a shame to have developers come in and tear down existing single-family homes and essentially build cheap triplexes all over the city.

Please also propose a third option instead of "all or nothing" as is required by law. I think there is a middle ground that may be best instead of going for all or nothing with these measures.

Please consider limiting Airbnb and VRBO uses as these uses do not help with Seattle's affordable housing shortage.

I am generally in favor of eliminating the parking requirement and increasing SF. Not sure about height requirement - this may need further study.

Thanks,

Susan Ingham

**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Thursday, November 16, 2017 3:48 PM  
**To:** Peggy Hagerman; Johnson, Rob  
**Cc:** ADUEIS  
**Subject:** RE: Oppose removing owner occupancy for DADUs

Good afternoon Peggy,

Thank you for your comments. I have forwarded them along to the scoping process for the Environmental Impact Statement for changes to backyard cottages. At this time, a study is commencing to analyze different strategies and access potential impacts with those approaches prior to legislation being considered by City Council. Please stay engaged with this process over the next year as there will continue to be opportunities for additional engagement and new information along the way.

For the latest on changes to single-family zones within Urban Villages and Urban Village Expansion Areas, see [http://www.seattle.gov/hala/about/mandatory-housing-affordability-\(mha\)](http://www.seattle.gov/hala/about/mandatory-housing-affordability-(mha)).

All the best,

**Spencer Williams, AICP, Assoc. AIA**  
Legislative Assistant to Councilmember Johnson-District 4  
E: [Spencer.Williams@Seattle.Gov](mailto:Spencer.Williams@Seattle.Gov)  
O: (206) 684-8168  
C: (206) 384-2709

Click Here to Sign Up for Rob's Newsletter



---

**From:** Peggy Hagerman [mailto:peg@bluecharles.com]  
**Sent:** Wednesday, November 15, 2017 1:31 PM  
**To:** Johnson, Rob <Rob.Johnson@seattle.gov>  
**Subject:** Oppose removing owner occupancy for DADUs

Rob, I oppose the changes to the backyard cottage rules that are being discussed within city government. While I support some restructuring of our SF neighborhoods along Urban Villages, I believe that removing the owner occupancy requirement while simultaneously allowing both backyard cottages and mother-in-law apartments on the same lot would negatively affect the livability and character of single-family neighborhoods. WITH THE OWNER LIVING ON HIS/HER PROPERTY, development and rental practices are more thoughtful and respectful of the neighborhood.

The rules changes proposed would have profound impacts on single-family neighborhoods throughout the city, both inside and outside of Urban Villages. The changes are little different than the original HALA proposal to allow multi-family developments in single-family zones? That proposal was rescinded due to its unpopularity with voters. This one should be too.

Please prevent these rule changes from occurring.

Peggy P Hagerman  
6542 Palatine Ave N  
Seattle 98103

**ADUEIS**

---

**From:** Bill Bradburd <bill@grandscheme.com>  
**Sent:** Thursday, November 16, 2017 3:56 PM  
**To:** ADUEIS  
**Subject:** Scoping Comments: ADU EIS; Consider Gentrification and Displacement of Marginalized Communities

**To:** **Aly Pennucci, Council Central Staff**  
**Nick Walsh, Planner OCPD**  
**Councilmember Mike O'Brien**  
**Councilmember Rob Johnson**  
**Councilmember Lisa Herbold**  
**Councilmember Lorena Gonzales**  
**Councilmember Sally Bagshaw**

**Re: Scoping Comments pertaining to the ADU-EIS**

**Dear Aly Pennucci, Nick Walsh, et al:**

I would respectfully ask that the scope of the EIS consider potential impact of displacement and gentrification, particularly as it pertains to lower income neighborhoods and neighborhoods that are majority non-white:

The EIS should professionally analyze the economic and displacement impacts of the proposal on various segments of single-family housing by market value, location within the city, home ownership/rental, and ethnicity of ownership/tenant. The scope of the EIS should identify areas of potential impact by analyzing issues of gentrification and displacement of marginalized communities by asking the EIS to analyze economic and displacement impacts of the legislation:

**A. Vulnerable Locations:**

During the Queen Anne Appeal Hearing last year and articulated clearly in the Hearing Examiner's Decision, experts from the City and the appellant asserted that *certain neighborhoods and populations* would be most heavily impacted. Many neighborhoods have already been adversely affected by gentrification, and as result large percentages of these communities have been displaced and their once affordable properties have been converted to market rate rentals and for-purchase homes. Commensurate with this change have been upward spikes in rents and house values.

**B. Market value:**

During the prior ADU appeal hearing and in the Hearing Examiner's Decision, experts from the City and the appellant asserted *that market value of single family properties would be greatly impacted*, converting once affordable properties to market rate rentals and for-purchase homes.

By increasing the opportunities to add two additional residences on each single family property, thereby converting single-family neighborhoods to multi-family commercial rental neighborhoods, the market values of all residential properties would increase. These are gentrifying factors and should their impacts should be studied.

**C. Home ownership:**

During the same prior ADU appeal hearing and found in the Hearing Examiner's Decision, experts from the City and the appellant stated that the proposal would change the ownership of homes, especially in neighborhoods with more affordable properties, and in communities of color. The proposal creates the opportunity for developers to purchase affordable homes and convert them to three residences without any ownership or parking requirements. The EIS should study the potential impacts to home ownership opportunities for the average citizen now in completion from speculative buyers and investors. The impacts to homeownership opportunities for people of color should also be assessed.

Sincerely,

Bill Bradburd  
1642 S Lane St  
Seattle WA 98144

**ADUEIS**

---

**From:** Martin Henry Kaplan <mhk@martinhenrykaplan.com>  
**Sent:** Thursday, November 16, 2017 4:03 PM  
**To:** ADUEIS  
**Subject:** Queen Anne Community Council LURC Scoping Comments ADU-EIS

**Queen Anne Community Council**  
 Land Use Review Committee  
 Planning Committee



12 November 2017

**Aly Pennucci, Council Central Staff**  
**Nick Walsh, Planner OCPD**  
**Ketil Freeman, Council Central Staff**  
**Mayor Tim Burgess**  
**Councilmember Mike O'Brien**  
**Councilmember Rob Johnson**  
**Councilmember Lisa Herbold**  
**Councilmember Lorena Gonzales**  
**Councilmember Sally Bagshaw**

**Re: Scoping Comments pertaining to the ADU-EIS**

**Dear Aly, Nick, et al:**

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives' plus an additional general consideration as well. You have only offered one alternative to the exiting code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we successfully appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

**Hearing Examiner File: W-16-004**

**Associated File Numbers:**

**Department Reference Numbers:**

**Date:** December 13, 2016

**Type:** SEPA, Design Review, Environmentally Critical Areas

**Examiner:** Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount

to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives, our added Concurrency issues, and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

---

### **Queen Anne Community Council Land Use Review and Planning Committee** **ADU-EIS Scoping Comments**

---

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units)  
Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

---

#### **1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:**

**(Alternative 1) Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

**(Alternative 2) City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** *During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.*

*We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.*

*Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.*

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3) **Queen Anne Adds:** A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) **OR** one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

## 2. **Parking:**

(Alternative 1) **Existing Land Use Code Regulation**

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

(Alternative 2) **City Proposed Change to:** No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) **Queen Anne Adds:** One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. **Owner Occupancy:**

(Alternative 1) **Existing Land Use Code Regulation**

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

(Alternative 2) **City Proposed Change to:** No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave owner occupancy requirement unchanged.

#### 4. **Minimum Lot Size for a DADU:**

**(Alternative 1) Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

**(Alternative 2) City Proposed Change to:** 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft.

Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

**(Alternative 3) Queen Anne Adds:** No Alternative-Leave minimum lot size requirement unchanged.

#### 5. **Maximum square footage:**

**(Alternative 1) Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas

DADU (Backyard Cottage): 800 sq ft including garage and storage areas

**(Alternative 2) City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas

DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses.

300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

**(Alternative 3) Queen Anne Adds:** Many Seattle neighborhoods are characterized by large lots and wide streets.

These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft, cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

#### 6. **Maximum Height:**

- (Alternative 1) **Existing Land Use Code Regulation**  
No change from existing height limits, which vary by lot width and range from 15-23 feet
- (Alternative 2) **City Proposed Change to:**  
Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** *We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.*

- (Alternative 3) **Queen Anne Adds:** Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

#### 7. **Lot Coverage Limit:**

- (Alternative 1) **Existing Land Use Code Regulation**  
35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet
- (Alternative 2) **City Proposed Change to:**  
No Change

**Concerns:** *Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.*

- (Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage requirement unchanged

#### 8. **Rear Yard Coverage Limit:**

- (Alternative 1) **Existing Land Use Code Regulation**  
40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage
- (Alternative 2) **City Proposed Change to:**  
60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** *Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.*

- (Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

#### 9. **Location of Entries:**

- (Alternative 1) **Existing Land Use Code Regulation**  
DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.
- (Alternative 2) **City Proposed Change to:**

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.*

(Alternative 3) **Queen Anne Adds:** DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 10. Roof Features:

(Alternative 1) **Existing Land Use Code Regulation**

No exceptions for roof features on accessory structures are allowed.

(Alternative 2) **City Proposed Change to:**

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** *The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Roof Features requirement unchanged

## 11. Household Size:

(Alternative 1) **Existing Land Use Code Regulation**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

(Alternative 2) **City Proposed Change to:**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** *The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Household Size requirement unchanged

## 12. MHA Requirements:

(Alternative 1) **Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.*

(Alternative 3) **Queen Anne Adds:** Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

### 13. Rental Registration and Inspection Ordinance (RRIO):

(Alternative 1) **Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.*

(Alternative 3) **Queen Anne Adds:** No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

### 14. Issues of Concurrency

**Concerns:** *The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure **before** said growth occurs. This has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:*

**A. Schools;** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion-dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on-ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options **before** you increase density?



Martin Henry Kaplan, Architects AIA  
Seattle Office

360 Highland Drive, Seattle WA 98109  
T.206.682.8600 F.206.284.4400

Sun Valley Idaho Office

251 Hillside Drive, PO 482, Ketchum, ID 83340  
T.208.725.0014 F.208.725.0014

[www.MartinHenryKaplan.com](http://www.MartinHenryKaplan.com)

Notice: Privileged and confidential communication. If you are not the addressee, you may not read, copy, or distribute this email. If you receive this email in error, please advise us immediately by return email and delete it from your system. Thank you.

**ADUEIS**

---

**From:** Alexis Zolner, Treasurer Fauntleroy Community Association <fcaforall@gmail.com>  
**Sent:** Thursday, November 16, 2017 4:12 PM  
**To:** ADUEIS; Johnson, Rob; O'Brien, Mike; Herbold, Lisa; Gonzalez, Lorena; Sawant, Kshama; Burgess, Tim  
**Subject:** ADU Comments



Fauntleroy Community Association  
P.O. Box 46343  
Seattle, WA 98136-6343

November 15, 2017

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

Subject: Accessory Dwelling Units EIS

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

- retain the character of our Fauntleroy neighborhood and businesses,
- provide for affordable housing, with equitable 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, 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. We sponsor two local festivals and issue quarterly newsletters for 400 member households, businesses and supporters.

Proposed City of Seattle zoning changes for West Seattle and specifically Fauntleroy, violate these common sense principles, and those of any neighborhood plan with respect to neighborhood parking.

The proposed changes do not require off street parking for accessory dwelling units. This means that residents living in these units will have no choice but to park on the street. This is particularly egregious for the Fauntleroy area as street parking is already limited.

The FCA is already on record that there is and has been 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 the 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.

**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.**

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; a plan that preserves the small town character that keeps West Seattle such an attractive place to work and live. To that end we are also concerned with that part of the proposal to allow owners to live offsite. The purpose of the ADU and DADU concept as outlined in the City proposal is to allow for additional low cost housing for residents when there is such a housing shortage. The problem is that there is no assurance that that is how the ADUs or DADUs will be used. If the ADU or DADU designed for long term rental to a local resident is rented as a vacation home or unit, the result is a loss of community because of the increased density with no benefit to the City or resolution of the problem. Under the proposed scenario there is nothing to prevent (and we all know it will happen) a developer/speculator from buying and developing a home adding an ADU or DADU and renting out as a vacation home. **Thus, we do not support the notion that an owner is not an occupant of the property and the City should retain the requirement they've carried for years, owner having to occupy one of the units for six or more months per year.**

**Lastly, 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 or DADUs.** We already have serious water runoff and slide problems in West Seattle. 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 and DADUs. 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 and DADUs.

Thank you.

Sincerely,

Mike Dey, President  
 Fauntleroy Community Association  
[Msdey50@aol.com](mailto:Msdey50@aol.com)

cc: Councilmember Lisa Herbold, West Seattle District 1 - [lisa.herbold@seattle.gov](mailto:lisa.herbold@seattle.gov)

Planning, Land Use & Zoning committee

- . Rob Johnson - [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov),
- . Mike O'Brien - [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)
- . Lisa Herbold - [lisa.herbold@seattle.gov](mailto:lisa.herbold@seattle.gov)
- . Lorena Gonzalez - [lorena.gonzalez@seattle.gov](mailto:lorena.gonzalez@seattle.gov)

Affordable Housing, Neighborhoods & Finance committee

- . Tim Burgess - [tim.burgess@seattle.gov](mailto:tim.burgess@seattle.gov),
- . Lisa Herbold - [Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov),
- . Rob Johnson - [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov),
- . Mike O'Brien - [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)

Sustainability & Transportation committee

- . Kshama Sawant - [Kshama.Sawant@seattle.gov](mailto:Kshama.Sawant@seattle.gov)
- . Lisa Herbold - [Lisa.Herbold@seattle.gov](mailto:Lisa.Herbold@seattle.gov),
- . Rob Johnson - [Rob.Johnson@seattle.gov](mailto:Rob.Johnson@seattle.gov),
- . Mike O'Brien - [mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)

**ADUEIS**

---

**From:** nfmiller17@comcast.net  
**Sent:** Thursday, November 16, 2017 4:32 PM  
**To:** ADUEIS  
**Subject:** EIS Scoping for Accessory Dwelling Units in Single-Family Zoning

Dear City Officials,

I am in support of the Phinney Ridge Community Council letter as stated below:

*Re: Accessory Dwelling Unit EIS—comments concerning scope and alternatives*

*The Phinney Ridge Community Council submits the following comments concerning the scope of the Environmental Impact Statement for the proposed Accessory Dwelling Unit legislation, and the alternates to be considered by the EIS.*

*First, we join the Queen Anne Community Council in asking that the EIS contain a third alternative in addition to “no action” and the sweeping code amendments contained in the proposed legislation.*

*First, it is common--and useful in decision-making--for an EIS to contain three alternatives. Second, the City is likely to adopt some changes to current ADU policies. As currently proposed, the EIS presents decision-makers with the binary option of radical change or nothing. This seems to presume that the City Council will adopt the current proposal regardless of its consequences. Decision-makers and the public should instead be given the benefit of a fair range of options, and a full analysis of their consequences. Anything less will be inadequate to guide informed decision-making.*

*Second, we join the Queen Anne Community Council in asking that the EIS analyze the alternatives in light of concurrency issues under the State Growth Management Act. Expansion of the City’s infrastructure lags far behind its rapid population growth. The proposed ADU legislation would certainly exacerbate this problem. We therefore ask that the EIS consider the alternatives’ effect on schools, parks and other public facilities, roads and traffic, public transit, and utility infrastructure. The EIS also should analyze the alternatives’ effect on tree cover and carbon-dioxide capture.*

*Following are the Phinney Ridge Community Council’s suggestions concerning the elements that should be contained in a third alternative in the EIS. These suggestions are taken from our In March 2016 letter and memorandum to the City concerning the proposed ADU legislation. We have shared that correspondence with various City officials on a number of occasions since that time. We have also asked that it be made part of the record for the environmental review of the ADU proposal. We believe that a third alternative in the EIS should outline a proposal that:*

- Makes changes dependent upon the circumstances of individual neighborhoods rather than imposing a “cookie-cutter” approach that fails to recognize the unique qualities and circumstances of each. For example, parking requirements should reflect each neighborhood’s needs and situation. The parking situation on View Ridge, for example, is completely different from that on Capitol Hill. Average lot sizes also vary wildly among neighborhoods. While a 10,000 square-foot lot may be able to accommodate three dwelling units under some circumstances, a 3,500 square foot lot certainly can’t do so.*

- Makes changes incrementally, so that the City can evaluate their effect before imposing them wholesale throughout the City. For example, the City might consider limiting the total number of ADU/DADU combinations in each area until the effects of the change become apparent.*

- Retains the owner-occupancy requirement for all ADUS. In this respect, we note that Council Member Mike O’Brien has told members of the Phinney Ridge Community Council on at least two*

*occasions that he did not intend to effectively eliminate the owner-occupancy requirement, as the current legislation would do. We also note that we believe that owner-occupancy is perhaps the single most important element in ensuring that any changes to ADU regulations do not worsen speculative development by absentee landlords.*

- Maintains the current 4,000 square-foot minimum lot size for DADUs.*
- Maintains current lot-coverage and size regulations for DADUs.*
- Contains meaningful limitations on the use of ADUs as short-term rentals, to ensure that new development is used as housing rather than hotel rooms.*
- Contains meaningful design review and guidelines to ensure that DADUs are consistent with neighborhood character. We note that the ADU regulations in both Portland and Vancouver, B.C. recognize this issue.*

*Thank you for your consideration.*

*For the Phinney Ridge Community Council:*

*Alice Poggi, President*

*Ted Inkley, Vice-President*

*Irene Wall, Secretary*

*Terry Cook, Treasurer*

Sincerely yours,

Noel Miller  
6533 Palatine Ave N.  
Seattle, WA 98103

**ADUEIS**

---

**From:** Deb Barker <djb124@earthlink.net>  
**Sent:** Thursday, November 16, 2017 4:32 PM  
**To:** ADUEIS  
**Cc:** Deb Barker's e-mail  
**Subject:** Scoping comments for ADUEIS

The list of alternatives should include the following **Alternative 3** items:

1. ADD - Multiple ADU types shall be permitted on one lot only when the existing lot size is more than 10,000 square feet, and the lot cannot be further subdivided.
2. ADD - Off street parking shall be required when there is more than one ADU type on one lot.
3. ADD - Require property owner to obtain City business license as a landlord and appropriate fees when owner occupancy is not required.
4. ADD - Minimum lot size is 5,000 square feet
5. No change
6. ADD- Height maximums are five feet lower when multiple ADU's are located on one lot, irregardless of the lot width.
7. No change
8. No change
9. No Change
- 10 No change
11. ADD - If one lot has a primary dwelling unit, an ADU and an DADU, and the owner occupies one of the units full time, the limit of the household size is 12 unrelated persons.
12. No Change
13. No Change.

Sincerely,

Deb Barker

Deb Barker  
206-940-2255 (m)  
djb124@earthlink.net

## ADUEIS

---

**From:** Jeff Laufle <lauflejl@comcast.net>  
**Sent:** Thursday, November 16, 2017 4:42 PM  
**To:** ADUEIS  
**Cc:** ruthalice@comcast.net  
**Subject:** RE: DADU EIS scoping input

Apologies; I left Ruth Williams's email off my original message.

Jeff

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

From: Jeff Laufle [mailto:lauflejl@comcast.net]  
Sent: Thursday, November 16, 2017 4:39 PM  
To: 'ADUEIS@seattle.gov' <ADUEIS@seattle.gov>  
Subject: DADU EIS scoping input

Ms. Pennucci,

Here are comments from the Thornton Creek Alliance for the scoping phase of the DADU EIS being conducted by the City of Seattle.

If you have any questions, please feel free to contact me, or Ruth Williams (copied here).

Jeff Laufle  
President, Thornton Creek Alliance

## ADUEIS

---

**From:** Emory Baldwin <ebaldwin@fabcab.com>  
**Sent:** Thursday, November 16, 2017 5:00 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units EIS: Scoping Comments (feedback)

To whom it may concern:

I am writing in response to the proposed updates to the ADU regulations. In general, I am in favor of allowing all single family properties to have an accessory dwelling unit (regardless whether they are attached or detached). I agree that this is a good way of increasing density without upsetting the character of a neighborhood. I am concerned, however, that allowing property owners to have both an attached and detached ADU will cause too much disruption to neighborhoods (in terms of parking and character). I also really do not want the city to get rid of the owner residency requirement. I fear that could lead to having a lot of "party houses" where renters don't care about the neighborhood and the quality of life will go down.

Thanks for listening.

Sincerely,

Emory Baldwin, AIA

**FabCab** | Principal Architect  
ebaldwin@fabcab.com | 206.275.2345 (office) | 206.910.1990 (cell)  
www.fabcab.com

**ADUEIS**

---

**From:** Kathy Harding <kathard9@yahoo.com>  
**Sent:** Thursday, November 16, 2017 5:04 PM  
**To:** ADUEIS  
**Subject:** ADU-EIS Scoping

Seattle City Council,

I'm writing to vehemently oppose Councilmember O'Brien's proposal to convert every single-family neighborhood to multi-family, allowing each single-family lot to contain three residences, with no ownership or parking requirements, and for 12 unrelated people to reside on every single property. This proposal profoundly and tragically alters the character of our city. Moreover it is absolutely NOT required to fix our housing crisis.

I have lived in Seattle for 20 years and watched the city wrestle with fast change. Yes, more and more people are coming to Seattle and they need places to live. So do families. Families need space. Children need yards. Streets they can kick a ball around (or even cross to a friend's house) where strangers aren't zipping down the street in expensive cars on their way to a place they will work for likely two years before moving on -- having ripped the fabric of what Seattle once meant apart. Meanwhile, we stay, organizing neighborhood events to prevent crime, build community, raise money for food banks, and support our elderly and disabled neighbors. AND SO ON.

What I most resent is that you are stealing our sky, polluting our streets, felling our trees, calling us names, and claiming the moral high ground. But you are NOT supporting density. Your cynical and short-sighted housing projects are clearly designed to line developers' pockets and provide upscale housing to incoming tech workers. Take the McGraw development where the Children's Home once stood on Queen Anne. You COULD have built a wonderful apartment complex with a beautiful central courtyard (don't we still want trees and birds around here?) and even a preschool in conjunction with displaced seniors housing (easily aligned with Mary's Place) but no. You built tacky townhomes selling for \$1M each -- a development estimating to house about 60 people. Then you have the nerve to strip away every semblance of neighborhood life and call anyone who doesn't agree a NIMBY? Shame on you.

I have seen this type of sell-out again and again all over the city, including the Central District, where I lived for seven years.

So color me skeptical that this latest proposal is anything more than a land grab.

Get creative, and keep Seattle SEATTLE while coming up with creative, family-friendly, and INCLUSIVE housing solutions.

Kathy Harding  
206-605-1132  
Seattle, WA

## ADUEIS

---

**From:** Emory Baldwin <ebaldwin@fabcab.com>  
**Sent:** Thursday, November 16, 2017 5:38 PM  
**To:** ADUEIS  
**Subject:** Re: Accessory Dwelling Units EIS: Scoping Comments (feedback)

Thanks for your quick reply. I appreciate it!

Emory Baldwin, AIA

**FabCab** | Principal Architect  
ebaldwin@fabcab.com | 206.275.2345 (office) | 206.910.1990 (cell)  
www.fabcab.com

On Thu, Nov 16, 2017 at 5:30 PM, ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)> wrote:

Emory,

Thank you for both of the comments you submitted. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process.

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

**From:** Emory Baldwin [mailto:[ebaldwin@fabcab.com](mailto:ebaldwin@fabcab.com)]  
**Sent:** Thursday, November 16, 2017 5:17 PM

To: ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>

Subject: Accessory Dwelling Units EIS: Scoping Comments (feedback)

To whom it may concern:

I am writing in response to the proposed updates to the ADU regulations, and have the following comments:

1. In general, I am in favor of allowing all single family properties to have an accessory dwelling unit (regardless whether they are attached or detached). I agree that this is a good way of increasing density without upsetting the character of a neighborhood. I am concerned, however, that allowing property owners to have both an attached and detached ADU will cause too much disruption to neighborhoods (in terms of parking and character).
2. I also really do not want the city to get rid of the owner residency requirement. I fear that could lead to having a lot of "party houses" with renters who don't care about the neighborhood and so the quality of life will go down for neighbors.
3. I think it is important to require one off street parking space for each ADU, but not necessarily for the primary home (if the primary home does not currently have one). Parking is already very difficult in most neighborhoods so please do not remove the parking space requirements.
4. Please do not increase the allowable number of unrelated people who can occupy a property. 8 people is already twice the current average household size (of 4). So I think that doubling the density of a property is ample. (Please do not triple it to 12!)

Thanks in advance for listening to my concerns.

Sincerely,

Emory Baldwin, AIA

FabCab | Principal Architect

[ebaldwin@fabcab.com](mailto:ebaldwin@fabcab.com) | [206.275.2345](tel:206.275.2345) (office) | [206.910.1990](tel:206.910.1990) (cell)  
[www.fabcab.com](http://www.fabcab.com)

**ADUEIS**

---

**From:** ADUEIS  
**Sent:** Thursday, November 16, 2017 5:58 PM  
**To:** 'Matt Babcock'  
**Subject:** RE: ADU EIS comments

Matt,

After the scoping period ends tonight, we will review all the comments we received and begin summarizing them in a scoping report. We intend to include the comment letters as an appendix to that report, so the public and decision makers will be able to read not only a synthesis of themes and the range of topics people raised but also the comments themselves.

After the scoping period, we will determine the scope of our analysis and then begin preparing the Draft EIS, which we expect to publish in the spring. A Draft EIS includes a comment period and a public hearing. This is the public's opportunity to review and comment on the adequacy of the environmental analysis. We then review those comments and respond to each one in a Final EIS, which typically includes a Preferred Alternative. There is no formal approval of a Final EIS, but the public has an opportunity to file an appeal after the Final EIS is published.

Land use changes like this proposal ultimately require approval of the City Council. When the EIS process is complete, the Council can vote on proposed legislation to amend the land use code, which would implement the types of changes we're studying in the EIS.

Nick

---

**From:** Matt Babcock [mailto:yipyipyipy2@gmail.com]  
**Sent:** Wednesday, November 01, 2017 7:10 PM  
**To:** ADUEIS <ADUEIS@seattle.gov>  
**Subject:** RE: ADU EIS comments

Aly and Nick,

Thank you. A few questions:

- How do you go about compiling information from the many and varied comments you get?
- From a fairly detailed set of comments like mine, what actually gets passed on to the decision makers?
- Who are the decision makers? Who reviews and approves the EIS? Where is the City Council involved in the process?

Regards,  
Matt Babcock  
206-743-4445  
mattbabcock.com

---

**From:** ADUEIS [mailto:ADUEIS@seattle.gov]  
**Sent:** Wednesday, November 01, 2017 5:28 PM  
**To:** Matt Babcock  
**Subject:** RE: ADU EIS comments

Matt,

Thank you for your comment. We will consider all comments at the end of the comment period as we determine the final scope of the study for the Accessory Dwelling Units\* Environmental Impact Statement (EIS) process. **Note that we extended the comment period 15 days to November 16.**

Best,

Aly Pennucci & Nick Welch

*\* Accessory Dwelling Units (ADUs) include backyard cottages, known as Detached Accessory Dwelling Units (DADUs), and in-law apartments, known as Attached Accessory Dwelling Units (AADUs)*

---

**From:** Matt Babcock [<mailto:yipyipyip2@gmail.com>]

**Sent:** Tuesday, October 31, 2017 8:24 PM

**To:** ADUEIS <[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)>

**Subject:** ADU EIS comments

I have identified 5 potentially affected resources that I think should be targeted for scrutiny. They are listed below, along with some thoughts about measures to mitigate related effects of the proposed zoning changes. Before getting to the specifics of affected resources, here are 3 general comments that apply broadly to the proposed changes:

#### GENERAL COMMENTS

1. I live in a single family neighborhood (Bitter Lake). I'm in favor of increasing housing stock in single family neighborhoods, and I think allowing additional ADUs is worth trying. However, ADUs are not magic bullets that will quickly solve all the problems related to housing affordability, so don't be in a rush to tear down barriers to development -- your constituents will appreciate a careful approach.
2. The cost to mitigate impacts should be higher for those who benefit more. The value of all single family lots will increase due to greater development potential, and the value of individual lots where ADUs are actually added will increase further. To share mitigation costs equitably, some should come from the city as a whole (everyone benefits to some degree), some from single family lot owners (presumably this will occur naturally as property tax valuations increase), and a sizeable chunk (at least 1/3) should come from permit fees associated with the construction of ADUs.
3. Budgeting for impact mitigation (including establishment of ADU fees) should be based on the high end of cost estimates, plus an additional safety factor. Err on the side of making neighborhood infrastructure work better, rather than just making it no less adequate. This will be better for the city in the long run, even if it means building fewer ADUs right away.

#### POTENTIALLY AFFECTED RESOURCES

##### A. Streets/traffic safety

Increased density will require additional pedestrian, bike, and vehicle traffic infrastructure. Improvement of unimproved alleys may be useful to provide better access for on-site

parking, detached ADUs, and perhaps garbage pickup. Alley paving could be done incrementally as new ADUs and houses are built on adjacent lots, as is done in the case of larger developments in other zones.

#### B. Stormwater runoff/drainage

This is particularly important in my neighborhood, where stormwater infrastructure works poorly in many locations. Any zoning changes that encourage construction of ADUs should also increase requirements for stormwater retention and provide greater incentives to reduce impervious surface area. Impact mitigation could also include a survey of existing drainage infrastructure and prioritization and implementation of improvements.

#### C. Local ownership

More valuable lots and more potential dwellings will result in increased pressure from non-local owners and developers to build spec houses, often after tearing down smaller older homes. This drives up home prices and results in revenues leaving the city. Owner occupants and landlords who live in the neighborhood should get a significant break on permit and infrastructure fees, to encourage development by long-term stakeholders with a vested interest in the physical character of the neighborhood, who are also more likely to spend their property rental or sale income locally. Owner occupants and neighborhood residents contribute to the neighborhood in many ways that non-local owners do not, so it is appropriate to require that non-local owners pay more.

#### D. Tree canopy

Increased pressure to develop means increased pressure to cut down trees. In my neighborhood, developers building spec houses are much more likely to cut down big trees than are people who actually live in the neighborhood. Replacement of big old trees with little new trees is not a meaningful form of mitigation, so we need to preserve the big old trees. Expand the definition of significant trees so that it applies to hundreds of times as many trees (i.e. not just dozens of trees around the city, but dozens of trees on each block and hundreds or thousands of trees in each neighborhood), and increase penalties for cutting them down so that the cost will be prohibitive.

#### E. On-street parking

I do not support removing the on-site parking requirement for ADUs. Increasing density without increasing on-site parking will negatively impact street parking availability. I like having street parking available near my house, particularly since I live on a street without sidewalks. I could support relaxing the on-site parking requirement in certain circumstances, like unusually small lots, lots with restricted street access, and developments that provide a central parking area for several adjacent lots.

Thank you for the opportunity to contribute to this process.

Regards,

Matt Babcock

10748 Dayton Ave. N

206-743-4445

**ADUEIS**

---

**From:** Ted and Alison Inkley <inksea@earthlink.net>  
**Sent:** Thursday, November 16, 2017 7:17 PM  
**To:** ADUEIS  
**Cc:** PRCC-Board-Communications@googlegroups.com; Kaplan, Martin  
**Subject:** Phinney Ridge Community Council comments re: ADUs/DADUs

Below are our comments, with a couple of minor types corrected; the substantive text is identical to that we previously submitted.

Ted Inkley  
 PRCC

**The Phinney Ridge Community Council submits the following comments concerning the scope of the Environmental Impact Statement for the proposed Accessory Dwelling Unit legislation, and the alternates to be considered by the EIS.**

**First, we join the Queen Anne Community Council in asking that the EIS contain a third alternative in addition to “no action” and the sweeping code amendments contained in the proposed legislation. First, it is common--and useful in decision-making--for an EIS to contain three alternatives. Second, the City is likely to adopt some changes to current ADU policies. As currently proposed, the EIS presents decision-makers with the binary option of radical change or nothing. This seems to presume that the City Council will adopt the current proposal regardless of its consequences. Decision-makers and the public should instead be given the benefit of a fair range of options, and a full analysis of their consequences. Anything less will be inadequate to guide informed decision-making.**

**Second, we join the Queen Anne Community Council in asking that the EIS analyze the alternatives in light of concurrency issues under the State Growth Management Act. Expansion of the City’s infrastructure lags far behind its rapid population growth. The proposed ADU legislation would certainly exacerbate this problem. We therefore ask that the EIS consider the alternatives’ effect on schools, parks and other public facilities, roads and traffic, public transit, and utility infrastructure. The EIS also should analyze the alternatives’ effect on tree cover and carbon-dioxide capture.**

**Following are the Phinney Ridge Community Council’s suggestions concerning the elements that should be contained in a third alternative in the EIS. These suggestions are taken from our In March 2016 letter and memorandum to the City concerning the proposed ADU legislation. We have shared that correspondence with various City officials on a number of occasions since that time. We have also asked that it be made part of the record for the environmental review of the ADU proposal. We believe that a third alternative in the EIS should outline a proposal that:**

- **Makes changes dependent upon the circumstances of individual neighborhoods rather than imposing a “cookie-cutter” approach that fails to recognize the unique qualities and circumstances of each. For example, parking requirements should reflect each neighborhood’s needs and situation. The parking situation on View Ridge, for example, is completely different from that on Capitol Hill. Average lot sizes also vary wildly among neighborhoods. While a 10,000 square-foot lot may be able to accommodate three dwelling units under some circumstances, a 3,500 square foot lot certainly can’t do so.**

- **Makes changes incrementally, so that the City can evaluate their effect before imposing them wholesale throughout the City. For example, the City might consider limiting the total number of ADU/DADU combinations in each area until the effects of the change become apparent.**
- **Retains the owner-occupancy requirement for all ADUs. In this respect, we note that Council Member Mike O'Brien has told members of the Phinney Ridge Community Council on at least two occasions that he did not intend to effectively eliminate the owner-occupancy requirement, as the current legislation would do. We also note that we believe that owner-occupancy is perhaps the single most important element in ensuring that any changes to ADU regulations do not worsen speculative development by absentee landlords.**
- **Maintains the current 4,000 square-foot minimum lot size for DADUs.**
- **Maintains current lot-coverage and size regulations for DADUs.**
- **Contains meaningful limitations on the use of ADUs as short-term rentals, to ensure that new development is used as housing rather than hotel rooms.**
- **Contains meaningful design review and guidelines to ensure that DADUs are consistent with neighborhood character. We note that the ADU regulations in both Portland and Vancouver, B.C. recognize this issue.**

**Thank you for your consideration.**

**For the Phinney Ridge Community Council:**

## ADUEIS

---

**From:** C SHETTLER <SSHETTLER@msn.com>  
**Sent:** Thursday, November 16, 2017 8:04 PM  
**To:** ADUEIS  
**Subject:** Comment on EIS Scope--urban canopy/tree concerns

Hi there,

I would like to comment on the EIS Scope as I have concerns about preserving the urban tree canopy.

I support increased density. As I lived in Europe for several years, I noticed that despite the density of dwellings a real effort was made to preserve substantial trees in the city. A single large specimen or a small grove of trees can go a long way toward improving human health, both psychologically and physically. In addition, trees provide needed stormwater retention and air pollution relief.

Please enact stronger protection for trees in this legislation, such as developer incentives to keep existing trees and mandated tree planting and ongoing care.

Thank you.

Sincerely,

Sandy Shettler  
206-412-2333

## ADUEIS

---

**From:** cliff shettler <cliffshettler@gmail.com>  
**Sent:** Thursday, November 16, 2017 8:09 PM  
**To:** ADUEIS  
**Subject:** Tree Protection Comment - EIS

Dear City of Seattle Staff:

I am writing to comment on proposed revision in code to increase density.

I am requesting that the plan be revised to include substantial protection for existing trees which are essential for human and environmental health. I am also requesting that the plan include incentives for developers to plant trees and covenants to ensure they are cared for.

Sincerely,

Cliff Shettler  
206-525-0067

## ADUEIS

---

**From:** Deb West <debwest1@comcast.net>  
**Sent:** Thursday, November 16, 2017 8:35 PM  
**To:** ADUEIS  
**Subject:** Parking

Please consider requiring one stall of off-street parking if there is more than one unit added to a property.  
Thank you

**ADUEIS**

---

**From:** Alex Stone <stone.alx0@gmail.com>  
**Sent:** Thursday, November 16, 2017 10:00 PM  
**To:** ADUEIS  
**Subject:** Zoning for ADUs and DADUs

We oppose removing the owner occupancy requirement in the proposed zoning changes for ADUs and DADUs. Without the owner occupancy requirement, these neighborhoods will be targeted for commercial rentals and lose the commitment and stability that a high level of owner occupancy has built. When an owner lives on their property, rental practices and development choices are more considerate of the neighborhood.

A second concern is that the size of ADUs be kept to the scale of "auxiliary", small in footprint and height. This provides a good range of housing sizes in the neighborhood, while fitting the scale of the historic residential neighborhoods and avoiding the extreme shading of a neighbor's property.

We live in Phinney-Greenwood and have moved away and chosen to return to this neighborhood.

Alexandra Stone and David Chui

**ADUEIS**

---

**From:** Michael Richards <mikelrich@msn.com>  
**Sent:** Thursday, November 16, 2017 10:30 PM  
**To:** ADUEIS  
**Subject:** ADUEIS Comment

First, I'll say that the EIS Scope is far too large and expansive throughout the City. These proposed ADU changes encompass the ENTIRE CITY! That is crazy. One size **does not** fit all. Individual neighborhoods had very little to say about this process. The comments I hear in my neighborhood are almost 90% opposed to the changes. I strongly oppose any changes to the current policies regarding ADUs until such time as individual neighborhoods can weigh in on what is appropriate for their neighborhood! **An EIS on any ADU policy changes should be neighborhood specific.**

- I especially oppose the notion of removing the onsite ownership requirement. Doing so would commercialize both the affected property and surrounding area. This would eventually degrade the area and remove it from the control of residents. Resident owners will have far more respect for neighbors, the neighborhood and upkeep of the property.
- I oppose decreasing the required size on an ADU eligible lot. 4000 sq ft is small enough!
- I oppose increasing the size and height of ADUs. These units should not impose on the rest of the neighborhood or change the existing character or landscape.
- All ADU's should be required to be long term residential options - not short term rentals or hotel lodging.
- If the affected neighborhood is at or above parking capacity (85%), any additional ADU should require 1 parking space per unit - or a restriction from the tenant from having ownership of a vehicle. I'm sure you can find a way to enforce that if required to do so!
- ADUs should be at least a respectful distance from any neighboring lot or property.

Thank you,

-----

Michael Richards

## ADUEIS

---

**From:** Sharon LeVine <sllevineusc@yahoo.com>  
**Sent:** Thursday, November 16, 2017 11:55 PM  
**To:** ADUEIS  
**Subject:** Re: Proposal to Turn Every SFR Into a 3 Unit Investment Property

The EIS must determine all of the impacts of creating 3 dwelling units on each parcel where there was - previously- one residential unit.

Negative impacts of removing the requirement that the property owner live on site must be fully enumerated.

Negative impacts of removing the onsite parking requirements for each unit must be fully delineated.

The EIS must enumerate all the impacts of turning each parcel - potentially- into 3 income producing dwelling units.

i.e. displacement of long term tenants, seniors on fixed incomes, retired persons, low income persons who will be displaced when "modest" structures are demolished and replaced with larger, more luxurious buildings.

All impacts of increasing the allowable size of "backyard" DADUs must be fully evaluated and the negative impacts described.

Describe the impacts when density in an area is dramatically increased and there has been no concurrent increase/improvement in infrastructure and amenities such as parks, schools, etc.

Include a complete traffic management plan for every neighborhood where the zoning changes are proposed.

Do not have a "one size fits all" zoning plan for each, individual neighborhood,

**ADUEIS**

---

**From:** Aleen Adams <aleenada@gmail.com>  
**Sent:** Friday, November 17, 2017 12:07 AM  
**To:** ADUEIS  
**Subject:** Backyard Cottages, ADU - EIS

I am writing to submit comments for the EIS regarding Mike O'Brien's proposed changes to ADU legislation. I am a concerned citizen, interested in real solutions to affordable housing, and thoughtful urban planning. O'Brien's proposal would have far-reaching ramifications to the character and infrastructure of neighborhoods, and has had little opportunity for community input. It would have the effect of promoting rampant development and developer short-cuts while offering no requirements that these dwellings actually solve the housing crisis in this city by being accessible or affordable to families.

There are 3 aspects to his proposal that are particularly problematic to neighborhoods and current infrastructure that I am requesting for further study to environmental impacts and input from residents before changing the existing code:

1. Converting every Seattle single-family neighborhood to multi-family allowing three residences per property. Every neighborhood has different constraints and needs to be evaluated accordingly. Make changes dependent on the circumstances of individual neighborhoods. There are good reasons to have single-family codes in some areas; multi-family is viable for every neighborhood/street and will strain already congested roads, water/sewer, and transportation and parking.
2. Property ownership requirements for ADUs. Without an owner-occupancy requirement, it will encourage rampant speculative development and lead to further affordable housing displacement, instead of helping to create affordable housing.
3. Parking requirements - maintain requirement of at least 1 parking space on site for every residence. It's naive to pretend that we don't have cars or need a place to park them, especially with such limited transportation options throughout most of the city. Each neighborhood has different types of roads, on-street parking and access to public transportation. Some neighborhoods like parts of Ballard and Phinney Ridge are already strained from existing development with narrow streets and limited parking and car congestion.

Thank you,

Aleen Adams

Homeowner, Greenwood Ave North

# **Appendix E: Email Comments with Attachments**

---

---

## ADUEIS

---

**From:** Victoria N. McCormick <homelessgrouch007@gmail.com>  
**Sent:** Monday, October 02, 2017 8:48 PM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Units  
**Attachments:** ottnd\_Chair-on-Street-1020x1470.jpg

**Dear Administrator:**

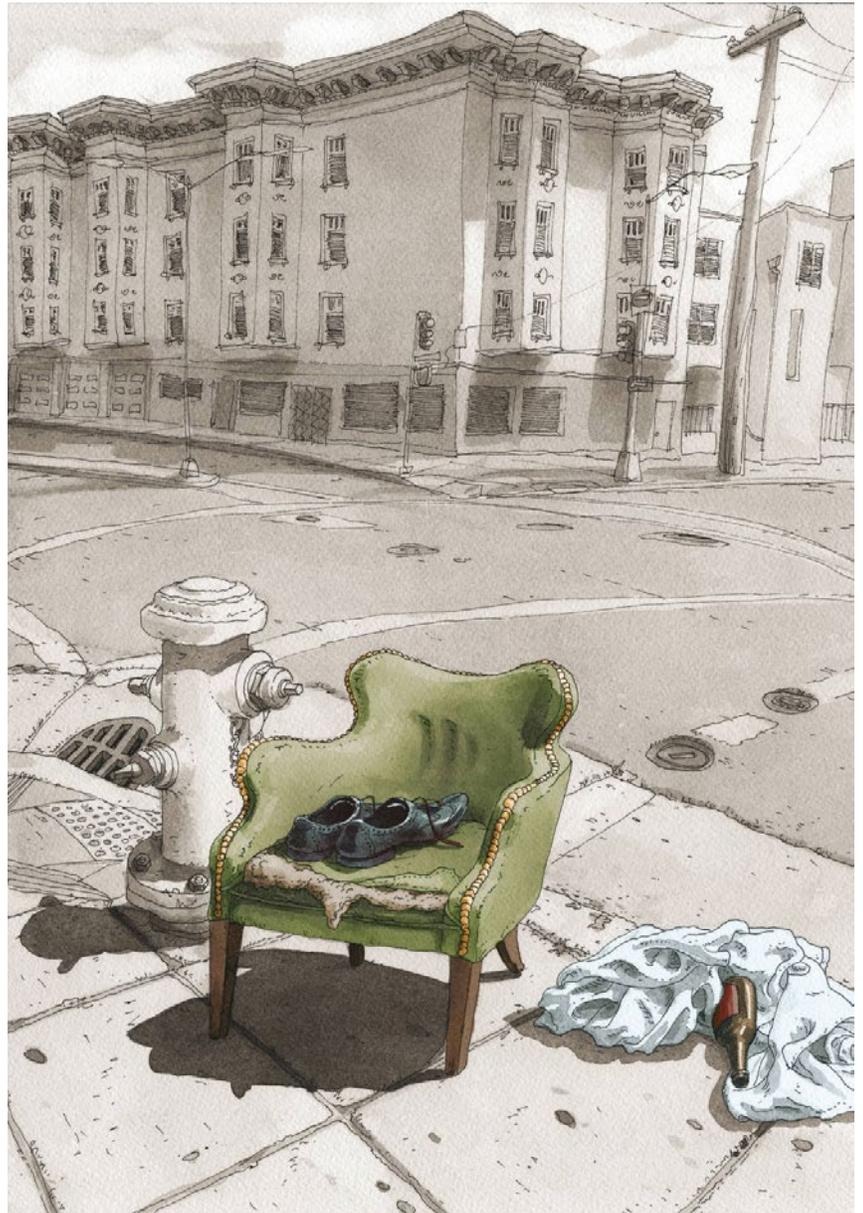
**Please note that without the missing middle component numerous people would be homeless! Including me. Retrofitting a garage into a living space made so that I was Not a burden on society. Please realize that this warrants consideration for which is doable with your help. I thoroughly believe that you are part of the problem or you are part of the solution!**

**Do you know how to save a life?**

**Cordially,**

**Accessory Unit Dweller**

**VMC**



**ADUEIS**

---

**From:** Michael <memsea@gmail.com>  
**Sent:** Friday, October 06, 2017 6:55 PM  
**To:** ADUEIS  
**Cc:** 6 David Artemison  
**Subject:** Re: Beginning our environmental review process for ADUs and backyard cottages  
**Attachments:** 20171006\_163152.jpg

Dear AADU/DADU Specialist,

I am a homeowner in the "Sunrise Heights" neighborhood of West Seattle. I own a nearly 8,000 sq. ft. lot with a couple of small shed-like structures on it. I would very much like to convert a portion of my back yard into a "DADU" and would someday like to convert a portion of my existing home into an AADU. Your proposed changes (Alternative 2) are very encouraging for me and what I hope to do to improve my property in the future.

I strongly support your intentions to streamline requirements in order to increase housing within existing Single Family Zoning. I have a good friend who works in the service industry here in Seattle and is feeling very "pinched" by the rise in rents the city has been experiencing the last few years. He wants to remain living and working in Seattle, the city he loves, yet still be able to someday purchase one of those new "Tiny Houses." In fact, he has approached me about installing one on a corner of my lot so that he can continue to afford to live in Seattle as well as retire with secure housing. I need to know from you actual requirements for me to prepare my property for such a situation, as soon as you are able to deliver them to me!

Question: How do these AADU/DADU regulations apply to "move-able" Tiny Houses and RV's? I have a neighbor (on Othello B. 29th) who has installed an RV on the back side of his lot (see attached picture). I'm ok with what has been done, but wonder how do these regulations apply to this kind of situation? How do we as neighbors "enforce" quality, cleanliness, health, safety and appearance standards for these non-foundation housing situations into the future? Do any of these regulations apply if the added structure(s) are - technically - on trailers and wheels?

As for housing structures that actually have foundations in the ground, in looking at your proposed changes (Alternative 2), here are my thoughts:

1) A single-family lot can have an AADU and a DADU.

I am very much in support of allowing single-family lots to have BOTH an AADU and a DADU - as long as the lot size allows for it, which appears to be effectively managed in requirement #7.

2) No off-street parking required.

Generally, I am in favor of this change as many of the people wanting AADU's and DADU's won't actually have cars. For example, my intention for converting a portion of my house to an AADU is to provide a place for an elderly family member to live after they are done driving. I live on a corner lot with a public access alleyway behind my lot, so I have two sides of my lot "available" for parking. I would suggest, for lots that only have one side facing the street, perhaps one additional parking space be required on the rear, alley-facing side. Far too many city streets already do not have enough room for the existing people and their cars.

3) No requirement for an owner to occupy the house, AADU, or DADU.

I am in favor - only as long as you include adequate funding for inspection and enforcement of building standards and rental practices! I would not want to have an "upscale Nicholasville" in my neighborhood in 15 years - with inadequate

and dilapidated buildings and too many unrelated people in one place! Please be careful with this one. Maybe require owners to have occupied 2 of the last 5 years before selling, or something along those lines?

4) 3,200 square feet lot size minimum for a DADU.

I assume this applies to any kind of DADU - including "movable" Tiny Houses?

5) Maximum Square Footage of AADU "and" DADU of 1,000 square feet, excluding garage and storage

This seems generous for the DADU's. Are these allowed to be two stories high?

Requirements 6 through 13, the proposed "Alternative 2" restrictions and regulations seem fine to me.

*Additional Suggestion:* While I don't expect you are eager to get into "style" considerations, one thing I believe would be helpful is some language to describe how these DADU's should be delineated from the rest of the property, as well as from other, neighbor lots and/or public property. Per the example of my neighbor who installed an RV along the back lot-line of his yard, there is a fence (and grade change) between the main house and the RV, which affords those in the main house some privacy and screening from seeing (as well as looking into) the RV. The rest of us are not so lucky. We get to walk and drive by looking right into their windshield and seeing the RV out and proud. Moreover, there is nothing surrounding the RV to keep anyone from walking right up to it. Personally, I don't like the look of RV's and am concerned about the city allowing such things to be so "open and visible" will bring detriment my own property's value as well as run down the neighborhood. I am concerned about this as well for these new "Tiny Homes" as well. Over time, if the RV (or Tiny Home) is not well maintained, this arrangement could create an eyesore for us all. (Have you seen the RV's parked along Marginal Way and other roadways lately?) It seems to me that you need to have some language that requires such structures (including "movable" housing units and RV's) to match the quality and character of the surrounding neighborhood and to be delineated with their own "area" by at least a 3-foot-high fence, or equivalent shrubbery.

Again, thank you for holding Open House meetings. Unfortunately, I will be out of town on October 17th. Please take my comments as if I was there in person.

Thank you,

Michael Matz

Homesowner at 7360 27th Avenue SW, Seattle, WA 98126

[206-601-4615](tel:206-601-4615)

[mensea@gmail.com](mailto:mensea@gmail.com)



**ADUEIS**

---

**From:** Williams, Spencer  
**Sent:** Friday, October 13, 2017 2:00 PM  
**To:** aileen langhans; Johnson, Rob  
**Cc:** ADUEIS  
**Subject:** RE: The Proposed changes to AADU/DADU regulations: URGENT RESPONSE REQUESTED!  
**Attachments:** ADU-EIS-Scoping-Handout.pdf; ADU-EIS-Scoping-Meeting-Boards.pdf

Good afternoon Aileen,

Thank you for your message and concerns. I have forwarded your comments, via this email, to staff working to complete the ADU/DADU review.

More information about the city's strategies to encourage backyard cottages can be found at <http://www.seattle.gov/opcd/ongoing-initiatives/encouraging-backyard-cottages>.

The City is currently in the scoping phase for the Environmental Impact Statement which will assess and study the potential impacts related to changes in ADU/DADU policies. I encourage you to provide comment on that draft scope which can be found at <http://www.seattle.gov/council/adu-eis>. You can comment by the following methods:

[See the proposed EIS scope](#) (I have also included the scoping document and supportive materials that will be at the public meetings on this message)

- [Online comment form](#)
- In writing at the EIS Public Scoping Meetings/Open Houses. These meetings will provide an opportunity to learn more about the proposed land use code changes and provide input on the environmental review process.
  1. October 17, 2017, 6:00-7:30 p.m.  
Location: High Point Community Center, 6920 34th Ave SW, Seattle, WA 98126
  2. October 26, 2017, 6:00-7:30 p.m.  
Location: Hale's Ales (in the Palladium), 4301 Leary Way NW, Seattle, WA 98107
- Via e-mail to: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)
- In writing to: Aly Pennucci, PO Box 34025 Seattle, WA 98124-4025

Your comments and questions are best directed to the EIS Process.

Thank you for your attention to this issue. For questions on the proposal, you can reach out to the staff member listed on the project page Nick Welch ([nicolas.welch@seattle.gov](mailto:nicolas.welch@seattle.gov)).

All the best,

**Spencer Williams, AICP, Assoc. AIA**  
 Legislative Assistant to Councilmember Johnson-District 4  
 E: [Spencer.Williams@Seattle.Gov](mailto:Spencer.Williams@Seattle.Gov)  
 O: (206) 684-8168  
 C: (206) 384-2709

[Click Here to Sign Up for Rob's Newsletter](#)



From: aileen langhans [mailto:aileenmargaret@yahoo.com]  
 Sent: Thursday, October 12, 2017 5:53 PM  
 To: Johnson, Rob <Rob.Johnson@seattle.gov>  
 Cc: Aileen Langhans <aileenmargaret@yahoo.com>  
 Subject: The Proposed changes to AADU/DADU regulations: URGENT RESPONSE REQUESTED!

## **RE: Accessory Dwelling Units – Proposed changes**

Dear Council Member Johnson:

It is with a deep frustration and sincere mistrust that I send this most urgent correspondence. The City of Seattle is in the process of creating an Environmental Impact Statement on the proposed expansion of the DADU/AADU regulations, but regrettably, only after being challenged through an appeal process. I have attended several meetings and other events promoting these proposals, but I am still uncertain about some of the changes and how their implementation will actually achieve the anticipated and promised results, while minimizing any potentially destructive impacts.

**I hereby request a response to each of the following specific concerns as soon as possible:**

- **The expansion of regulations to permit accessory dwelling units on properties without the owner occupancy requirement is quite disconcerting. During the city meetings I have attended, the city stated that these units will be a practical way of increasing density by providing affordable housing for more families. The city shared the following benefits that will result from the change – helping families make their mortgage payments, providing housing for extended family members, and/or providing income to help with catastrophic expenses that would otherwise crush their budgets. All of these examples involve owner occupied properties. SO, exactly how will this expansion of the law be advantageous to the absentee owner and speculator, while contributing positively to our neighborhoods? In other words, how will their benefits outweigh the potential negative impacts the city failed to acknowledge until challenged? Please provide me with specific examples that justify this most aggressive and radical change. If you fail to do so, then please explain the role these property owners played in drafting the change.**

- Given the just released plan for flexible parking, will the city finally realize and acknowledge that releasing the property owner from providing any off-street parking for its accessory dwelling renters will lead to the dumping of more cars onto the streets? **Surely this will only exacerbate the parking dilemma.**
- The reduction in lot size requirements and the increase in square footage allowed for accessory dwelling units will cause a loss of open yard, with the following problems: loss of vegetation, loss of habitat for other species with whom we share our earth, and an increased risk of the spread of fires from building to building. **Please explain why these changes are needed, what negative challenges will be faced, and how the so-called improvements will outweigh and dwarf any serious impacts. Again, please be specific!**
- Seattle is making these changes city-wide, without any assessment of and reflection on how they will disproportionately impact various neighborhoods. City Officials are quick to denounce the single-family neighborhood as deleterious to a growing population, given the need for affordable housing; but they fail to acknowledge that many of our homes which appear to be single-family from the streetscape actually contain hidden pockets of dense, affordable housing units, purchased by aggressive developers with deep pockets. The deconstruction of these homes into sub-leased rental units, in some homes as many as 16 units and most often without permits and/or official registration through the RRIO program, leads to an inaccurately low inventory by city departments of the true number of affordable units presently existing in our neighborhood. The problem is amplified by the fact that up to 8 unrelated adults can live in each home, which, in turn, has created much destruction to the integrity, health and vibrancy of our neighborhood, through excessive noise, garbage, parking violations, rambunctious parties, etc. And, since most of these tenants are transient, they have no ties to the neighborhood and no true sense of community spirit – an honorable goal which the city claims will be achieved through its generous amendments. Furthermore, although the city claims to be concerned about the health and safety of its renters, many of these units are not inspected, because they are not even documented in the RRIO application forms. **Please explain how the City will seek to offset any and all potentially negative impacts within those communities most likely to be compromised by the fruits of the new regulations.**
- Enforcement seems to be chronically and conspicuously lacking in any legislation passed in our fair city. **Given the poor implementation of the RRIO regulations, how does the city propose to demand compliance from these property owners? Again, be specific.**

There are many other issues that I believe need to be addressed prior to final approval of the new regulations, but these are of greatest concern to me and to our University Park Neighborhood.

**I am on the board of UPCC and our next meeting is on Thursday, October 19th, with a community-wide meeting to follow, on Wednesday, October 25th. I would sincerely appreciate your response in a timely manner, so that we can have a productive discussion about the topic at both meetings.**

Thank you for your dedicated service on behalf of the citizens of Seattle.  
Sincerely,

Aileen M. Langhans  
UPCC board- secretary

**ADUEIS**

---

**From:** Chrys Kim <chrys@chrystinekim.com>  
**Sent:** Tuesday, October 17, 2017 2:05 PM  
**To:** ADUEIS  
**Cc:** Brand, Jesseca; Welch, Nicolas  
**Subject:** Please approve all Alt 2 and one step beyond  
**Attachments:** ADUEIS response NEST A & D.pdf

Hello,  
Thanks for the opportunity to comment on BADUEIS and related issues of up zoning and growth.

Chrystine Kim  
NEST Architecture & Design

To City of Seattle  
DADUEIS

Thanks for the opportunity to respond.

Items 1 & 2 are directly related to a block in Greenwood, where North half of block will be NC-55 and South half is SF 5000.

1. We would ask the city to study ways to maintain privacy of our backyard cottage designs and yards by allowing flexibility in location, height, setbacks, rear yard coverage limits and roof features. I would like to propose looking at ways to add screening above the limited height for horizontal or vertical parapets, trellis, landscaping elements, potentially being a certain % open, similar to fence requirements.

2. Possibility of having the DADU in front of the primary residence. The current 800 sf house on the lot would become the Dadu and the main residence in the back, with reduced rear lot setback and a 35' height limit to mask the view from the roof level of NC-55 and help to transition the height disparity. I don't know how many lots/streets are like this in the city where the boundary between NC & SF is down the middle of the block, but it seems that our side of street should be increased to an L status that allows more flexibility with the zoning envelope.

3. Affordability, gender equity, age in place

The demographics of 75% of my clients have been single women (some single parents) in their mid 50s and up . In a related article and from my own experience and talking with clients, single women as they age have more chance of displacement due to having stayed home with children, unequal pay scale during working years, and less likely to re-marry. Allowing this group to have control of their finances by giving them a developer hat helps these longtime residents stay in their homes. There are people who are interested, but delaying decisions to move forward due to the EIS, some riding their neighbors' bandwagon of the "more parking and more renters" argument, and trying to work out their loans and budget numbers. The city needs to create as clear a path to help with these goals.

4. Financial incentives for renting to locals.

The argument for renting to long term/limited income locals (vs Airbnb) make sense as long as we have a housing crisis. Increasing units in single family zones, not just in multifamily, will help my friends and neighbors with kids in Columbia City who have been displaced out of the neighborhood an opportunity to come back to affordable family sized units.

5. The positive environmental impact of building inside city growth boundary, thereby keeping open spaces, farms, forests intact is something that isn't often discussed with the wider public as part of the argument for adding more housing units, in all zones.

As you can see, for me its personal, not business. Thanks for your support.

Chrystine Kim  
NEST Architecture & Design  
4801 Rainier Ave S.  
Seattle, WA 98118

**ADUEIS**

---

**From:** Patricia Fels <patriciatusafels@gmail.com>  
**Sent:** Thursday, October 19, 2017 7:50 PM  
**To:** ADUEIS  
**Subject:** cottages and EIS  
**Attachments:** DADU.doc

**Please see the attached letter concerning cottages.**

To: City of Seattle

Date: October 18, 2017

Re: Backyard Cottages & EIS

I am an architect who has designed and guided through the City permit process at least a dozen cottages. I am a big believer in the accessory dwelling unit. Density could be doubled in a neighborhood without a single big multi-complex being built. With the addition of cottages, the scale of the neighborhood is maintained and the city gains households. Historic buildings and landscapes are preserved. Local people building a cottage mean local people control their city, not developers from far and wide. Also, I find that cottage rents are more affordable than those of most of the new large apartment complexes. This is obviously because homeowners don't have the massive costs of acquisition and infrastructure installation that developers face. Homeowners can fit a cottage onto their property and usually hook up to existing water, sewer and power.

So, why is the City so afraid of the cottage?? Or, why is DCI so stingy. DCI treats 800 SF structures as if they were major construction. They tend to nit-pick. They say they are "protecting" citizens, but what they are doing is making housing un-affordable. Some examples:

**Parking** – a client who lived in North Seattle where there is ample space for parking on the street, ran into the 2-space parking problem. She had a driveway with plenty of room for two cars, but the city insisted that no car be parked in the first 20' (setback). Of course, every house in the neighborhood has cars parked in driveways in the first 20'. But the city wanted her to extend that driveway deep into her lot, so the cars would be setback 20'. This lot is beautifully landscaped with good tree coverage; the lot also had a large street setback (no curbs) that provided setback from the road. Instead of responding to the particular geography (easily visible from google map), DCI demanded the driveway be extended.

**Height** – I personally believe that the height limits are good. But I also believe that no owner should have to provide a survey to prove the height calculations. They are costly, time consuming and most homeowners don't even know how to get one. Another client had a slightly sloped lot; we averaged the height and kept walls at the height allowed. DCI sent the plans back and wanted elaborate calculations of each elevation to prove the height. I was able to provide the calcs, but my time doing this added of course to the cost of the project, which is supposed to be affordable.

**Area** – The present limitations work excellently for owners of 5000 SF lots. But the City should definitely consider a small percentage increase for larger lots and/or properties with a garage/cottage combination. Throughout Seattle (Capital Hill, North Seattle, Columbia City, ....) there are alleys with garages facing these alleys. Many owners would love to convert them into rentals. Garage with a cottage above is a great opportunity to expand housing in Seattle. Here's an example:

cottage project was on a SF7200 zoned lot. An existing garage (on an alley) was going to be expanded with a 2<sup>nd</sup> floor cottage. The garage was to continue as the homeowner garage. DCI would not allow the garage square footage to be considered separately. 800 SF was to be the total amount and there was no 'believing' that the garage was for the homeowners, cottage for renters. This type of inflexibility is harmful to everyone. A more rational approach would be an allowance for an existing 'homeowner' garage (say 200-250 SF) in DADUs where the zoning is SF7200 or greater.

DCI requires the full range of documentation for these small structures. Besides the construction drawings there are energy and structural calculations, forms, forms and more forms, including covenants that must be recorded with King County. For sure, this makes work for staff and architects, but does NOT help affordability of rentals. Owners must pay for much more elaborate permit drawings than should be required for a 600 SF –

800 SF structure. DCI even requires that a structure with living space of 500 SF have an air infiltration test to meet the energy code. As an architect well versed in energy conservation I can tell you that these small homes are immensely energy efficient – common sense wise. They have natural ventilation, natural light and a small footprint to heat. To require an air infiltration test is madness.

None of the DADUs or ADUs qualifies for “Subject to Field Inspection” (STFI), which would vastly reduce the amount of paperwork. DCI requires that each unit go through the full permit process. Even when an owner wants to place an ADU inside their home with no structural work they do not qualify for “Subject to Field”. This, once again, is counterproductive. Inspectors in the field are perfectly capable of insuring code compliance.

We as a country used to allow the building of small houses without a staff of experts. Builders and owners built the majority of the now-treasured bungalows of Wallingford. Their affordability resulted from a lack of many of the upfront costs that the City now levies on homeowners trying to build a backyard cottage.

I have been a longtime advocate for cottages, back to the original legislation and the first “trial” cottages. As I see Seattle swamped with huge, impersonal apartment complexes, I feel even more strongly the need for cottages. They provide a positive response to many of the issues we are now dealing with: affordability, density, neighborhood scale, tree/vegetation preservation, and local control.

Patricia Tusa Fels  
PTF Architects  
206-353-4174

**ADUEIS**

---

**From:** Sean Martin <SMartin@rhawa.org>  
**Sent:** Friday, October 20, 2017 2:56 PM  
**To:** O'Brien, Mike  
**Cc:** Herbold, Lisa; Johnson, Rob; Gonzalez, Lorena; ADUEIS; Pennucci, Aly  
**Subject:** Accessory Dwelling unit proposal  
**Attachments:** RHAWA supports ADU legislation.pdf

**October 20, 2017**

Councilmember Mike O'Brien  
 PO Box 34025  
 Seattle, WA 98124-4025

**Re: ADU/DADU legislation**

Dear Councilmember O'Brien,

The Rental Housing Association of Washington (RHAWA) represents more than 5,500 small, independent landlords. Our mission is to provide our membership with the tools and knowledge necessary to operate safe, affordable housing.

I'm writing you today regarding the Accessory Dwelling Unit EIS and changes being proposed to the rules for how ADU/DADU units may be sited, constructed, and operated.

Our region is in desperate need of action which can address the shortage of housing units we currently face. As the State's largest city, Seattle can be a leader on how to address this problem. Expanding opportunities for ADU/DADU construction should be a part of the solution, and RHAWA strongly supports Alternative 2 as the best way to move forward on this issue.

Two particular details of Alternative 2 which we strongly support are a waiving of the owner-occupancy requirement, and for reducing the minimum lot size to 3,200 square feet.

Expanding ADU/DADU opportunities supports two critical goals for the city:

1. Increased housing supply, particularly in the more affordable range of the market.
2. Create more opportunities for homeowners and home buyers, particularly vulnerable populations on fixed incomes, to offset rising property taxes and utility costs by creating an additional income stream.

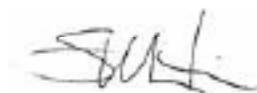
Additional to the policy being considered, we would also suggest consideration of additional changes which can expedite ADU/DADU construction and

- Change zone name from "Single Family" to "Residential." Our current "Single Family" has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. The City of Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's ADU production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.
- Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

We look forward to seeing this process move forward, and thank you for your consideration.

Sincerely,



Sean Martin,  
RHAWA External Affairs Director

CC: Lisa Herbold, Rob Johnson, Lorena González, Aly Pennucci

Regards,

Sean Martin | External Affairs  
T (206) 805-0800 | [smartin@RHAWA.org](mailto:smartin@RHAWA.org)

Rental Housing Association of Washington | 2414 SW Anderson St, Ste 0207, Seattle, WA 98106  
T (206) 283-0818 | (800) 335-2800 | F (206) 288-9481 | [RHAWA.org](http://RHAWA.org)



*This email contains general information and is not intended to apply to any specific situation. If you need legal advice or have questions about the application of the law in a particular matter, you should consult a lawyer.*



**Address**  
2414 SW Andover St,  
Ste D207  
Seattle, WA 98106

**Telephone**  
(206) 283 - 0816  
(800) 335 - 2990

**Website**  
[www.RHAWa.org](http://www.RHAWa.org)

**Fax**  
(206) 286 - 9461

October 20, 2017

Councilmember Mike O'Brien  
PO Box 34025  
Seattle, WA 98124-4025

Re: ADU/DADU legislation

Dear Councilmember O'Brien,

The Rental Housing Association of Washington (RHAWA) represents more than 5,500 small, independent landlords. Our mission is to provide our membership with the tools and knowledge necessary to operate safe, affordable housing.

I'm writing you today regarding the Accessory Dwelling Unit EIS and changes being proposed to the rules for how ADU/DADU units may be sited, constructed, and operated.

Our region is in desperate need of action which can address the shortage of housing units we currently face. As the State's largest city, Seattle can be a leader on how to address this problem. Expanding opportunities for ADU/DADU construction should be a part of the solution, and RHAWA strongly supports Alternative 2 as the best way to move forward on this issue.

Two particular details of Alternative 2 which we strongly support are a waiving of the owner-occupancy requirement, and for reducing the minimum lot size to 3,200 square feet.

Expanding ADU/DADU opportunities supports two critical goals for the city:

1. Increased housing supply, particularly in the more affordable range of the market.
2. Create more opportunities for homeowners and home buyers, particularly vulnerable populations on fixed incomes, to offset rising property taxes and utility costs by creating an additional income stream.

Additional to the policy being considered, we would also suggest consideration of additional changes which can expedite ADU/DADU construction and

- Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.
- Waive building permit fees for 5 years for AADUs and DADUs. The City of Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's ADU production.
- Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.
- Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to





**Address**  
2414 SW Andover St,  
Ste D207  
Seattle, WA 98106

**Telephone**  
(206) 283 - 0816  
(800) 335 - 2990

**Website**  
[www.RHAWa.org](http://www.RHAWa.org)

**Fax**  
(206) 286 - 9461

different rules such as continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

- **Double Ownership.** Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

We look forward to seeing this process move forward, and thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "SMartin", is written over a light blue horizontal line.

Sean Martin,  
RHAWA External Affairs Director

Cc: Lisa Herbold, Rob Johnson, Lorena Gonzàlez, Aly Pennucci



**ADUEIS**

---

**From:** Mark Travers <mark@marktraversarchitect.com>  
**Sent:** Monday, October 23, 2017 9:01 AM  
**To:** ADUEIS  
**Cc:** 'Christopher Kerl'  
**Subject:** FW: In support of greater density -- Please allow ADUs and DADUs in SF zones  
**Attachments:** SHELBY DADU ext 2 3-17.jpg

Hi ADUEIS:

I agree with Chris and all points in his letter, (see below). As an architect I have designed about a 2 dozen ADU's in the city of Seattle and in other jurisdictions.

From my point of view, the building typology meets a lot of needs, and is popular and flexible for many segments of the population.

One added benefit, that I would like to point out is related to public safety. My clients report to me that the added eyes on the street makes them feel safer. It offers the opportunity for security awareness and cooperation when one resident is out of town or working odd hours etc.

Good luck and remember: PROCESS Until everyone is EXHAUSTED...

MT

---

**From:** Christopher Kerl [mailto:chris.kerl@comcast.net]  
**Sent:** Sunday, October 22, 2017 1:12 PM  
**To:** ADUEIS@seattle.gov  
**Cc:** Christopher Kerl <chris.kerl@comcast.net>  
**Subject:** In support of greater density -- Please allow ADUs and DADUs in SF zones

Hi,

I am a resident and homeowner living in the Portage Bay neighborhood, and I would like to voice my support for legislation allowing for greater density in Seattle single-family zones, specifically permitting both ADUs and DADUs on lots like mine.

I believe it is a reasonable solution to address the increased demand for housing in the city while balancing concerns about maintaining neighborhood character. I am in fact already building a DADU on my alley, which will be an attractive and valuable addition to the neighborhood—see picture attached.

I think both ADUs and DADUs up to at least 1000 sf (and even larger on big lots perhaps) should be allowed with up to 12-14 residents total. Further, I do not believe there should be any owner-occupancy restrictions on such developments, but if there are concerns about investors possibly adversely impacting the market it may be reasonable to put limits on such ownership—perhaps up to a maximum of five such properties per single owner.

Allowing for ADUs and DADUs will give homeowners greater flexibility in handling housing concerns of aging parents and children, as well as providing additional financial support to families, and will also create more needed housing for Seattle.

Thank you,

Christopher Kerl

Christopher Kerl ; Attorney at Law ; C.A. Kerl PLLC  
2368 Eastlake Avenue East, Suite 228 ; Seattle, WA 98102  
Tel: (206) 328-8500 ; Fax: (206) 328-6384  
Email: [kerl@kerllaw.com](mailto:kerl@kerllaw.com) ; Website: [www.kerllaw.com](http://www.kerllaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail and any attachments thereto are intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby notified any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you receive this email in error, please immediately notify the sender by reply to this email and permanently delete the original copy and any copy of any e-mail, and any printout thereof.



**ADUEIS**

---

**From:** Matt Hutchins <matt@castarchitecture.com>  
**Sent:** Wednesday, October 25, 2017 10:01 AM  
**To:** ADUEIS; O'Brien, Mike; Herbold, Lisa; Johnson, Rob; Gonzalez, Lorena; Burgess, Tim; Assefa, Samuel; Nyland, Kathy  
**Subject:** Beyond Backyard Cottages: 10 ideas to address Seattle's housing shortage  
**Attachments:** Beyond Cottages Oct 24 2017.pdf

Dear Councilmembers, Department of Neighborhoods and Office of Planning & Community Development,

Over the last few months there have been intense online discussions about backyard cottages in conjunction with the ADU EIS. Recently a new group, MOAR, formed and met in person to brainstorm the many ways we could make backyard cottages more frequent, and in turn, the city more affordable.

*MOAR (More Options for Accessory Residences) is a group of citizens concerned with the future of the city, housing availability and affordability. We have diverse backgrounds, experiences and housing situations, but we're all Seattleites who want our city to allow more options for accessory residences. For us, our neighbors, and future generations.*

We put our thoughts and experiences together into a petition, "[10 Ideas to address Seattle's housing shortage](#)".

Please see the attached PDF that includes the names of over 220 people who have already signed this petition in just three days.

If you visit the petition website ([link](#)) you will see the fantastic reasons people have given for supporting MOAR's ideas for new housing options.

MOAR's petition will also be submitted as an official response to the request for public comment to the Environmental Impact Statement for the Accessory Dwelling Unit. We are sending these comments to [ADUEIS@seattle.org](mailto:ADUEIS@seattle.org).

We ask that you continue the difficult work to educate Seattleites about the important connections between housing choice, affordability and climate justice.

If you have any questions for the group, please feel free to contact me. Thanks!

—  
 Matt Hutchins  
 206.501.7051

**ADUEIS**

**From:** David Moehring <dmoehring@consultant.com>  
**Sent:** Friday, October 27, 2017 4:04 PM  
**To:** ADUEIS  
**Cc:** Pennucci, Aly  
**Subject:** ADU lot coverage confusion  
**Attachments:** 23-84A-024B.png

**Please help to clarify confusion among neighbors regarding two parameters of the proposed Accessory Dwelling Units EIS Scope:**

I don't believe anyone has a clear idea of the differences in Lot Coverage (as shown in SMC exhibit 23.84A.024 B) and Rear Lot Coverage.

A) Everyone I speak with, including those who were in attendance at Oct 26th Hales Brewery presentation, currently believes that **with or without ADU** (whether attached or detached), the lot coverage will **not exceed 35%** on SF-zoned sites. Is it true that the total primary dwelling, AADU, and DADU, and other accessory structures may not exceed covering just 35% of the site?

B) Seattle's ADU EIS website has an Alternative 1 (no change) versus Alternative 2. Item 7 for lot coverage limit shows no change in either option:

<p>35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet. 40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.</p>	<p>60 percent of a rear yard can be covered by a DADU and other accessory structures if the structure is only one story and if rear yard coverage from the principal dwelling is not more than 40 percent.</p>
--	--

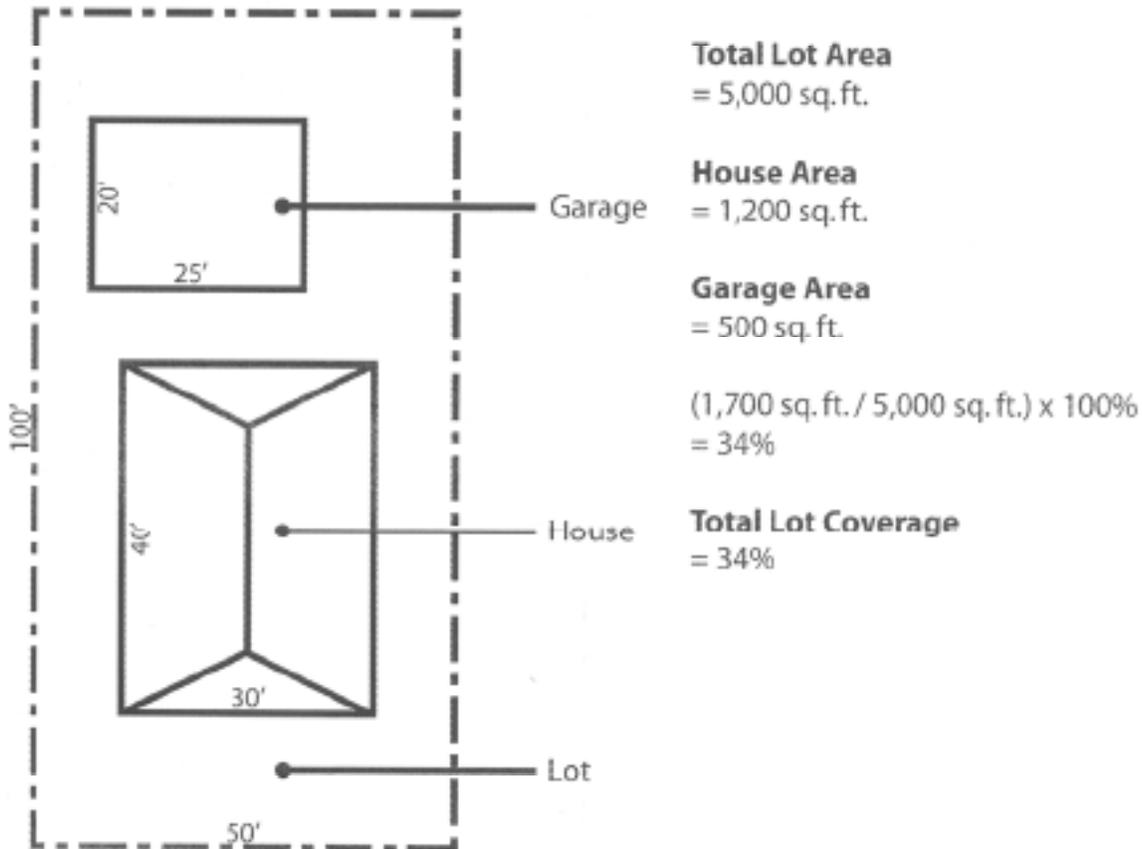
C) Seattle's ADU EIS website shows an increase of 40 percent to 60 percent in Rear Lot Coverage. What does this mean specifically?

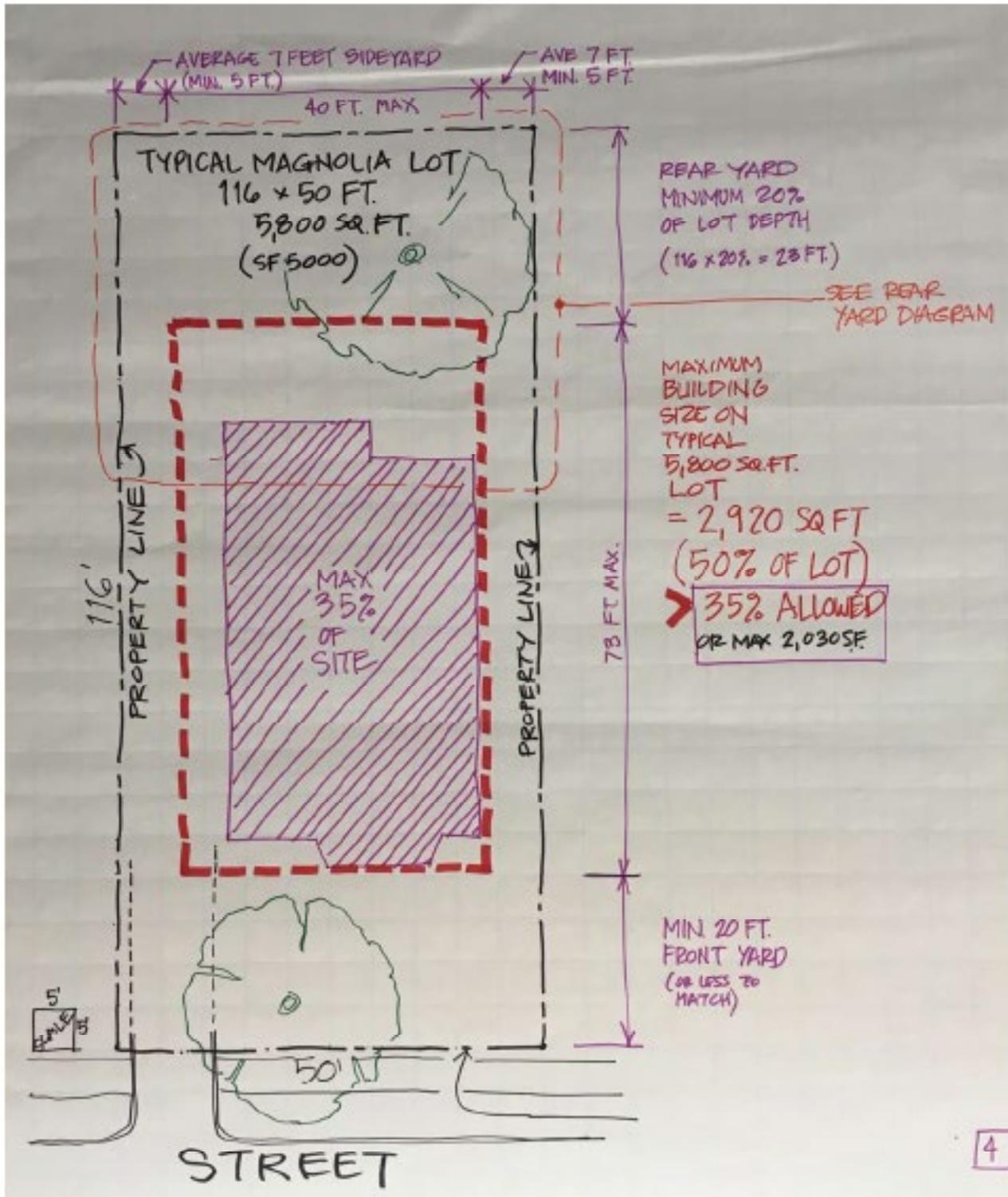
- Does it mean that within the total lot area coverage maximum of 35%, 60% of that 35% may be covered by an AADU, DADU, garage or other accessory structures?
- Does it mean that the current code allows up to 40% of the total lot to be covered by the principle dwelling, one ADU, a garage and other structures?
- Does it mean the proposed code will not allow up to 60% of the total lot to be covered by the principle dwelling, one ADU, a garage and other structures?
- Does it mean as stated in SDCI Tip 1.16b "The floor area of the backyard cottage is no more than 40 percent of the total floor area on the lot that is used for residential purposes, excluding garages, storage sheds, and other inhabitable spaces."
- Does it mean that in the proposed code that ADU (attached or detached) are excluded from the 35% lot area coverage limit? If so, a single story detached ADU may cover up to 60% of the rear yard area?
- What is the measure of the "rear yard"? is it from the rear setback to the rear property line (typically 20% of the lot depth)? Or is the rear yard measured from the back of the principle dwelling to the rear property line - being inconsistent from property to property?

This definition has significant implications relative to the scope of the study.

David Moehring AIA  
referencing <http://www.seattle.gov/council/adu-eis>

### Exhibit 23.84A.024 B Lot Coverage





**EIS FORM:**

**All comments are due by 5:00 p.m., November 1, 2017, and may be submitted:**

- Online at: [seattle.gov/council/ahu-eis](http://seattle.gov/council/ahu-eis)
- Via e-mail to: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)

• In writing to: Aly Pennucci, City Council Central Staff, PO Box 34025 Seattle, WA 98124-4025

\* Link to the City's Formal Announcement Beginning the EIS

Process-<http://wast6.seattle.gov/DP/LEIS/Notice.aspx?PID=1283&IID=26192>

## ADUEIS

---

**From:** Dan Keefe <papadan44@gmail.com>  
**Sent:** Monday, October 30, 2017 10:09 AM  
**To:** ADUEIS  
**Cc:** Mike Reinhardt; Pamela Bowe; Juarez, Debora  
**Subject:** Emailing: ADU letter R1  
**Attachments:** ADU letter R1.docx

Dear Ms. Pennucci:

Please find attached an email from the Meadowbrook Community Council stating its position and concerns regarding the proposed liberalization of the regulation for DADUs and ADUs soon to come for a vote by the Seattle City Council.

Sincerely,

Dan Keefe, President

Meadowbrook Community Council

Your message is ready to be sent with the following file or link attachments:  
ADU letter R1

**Note:** To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

October 30, 2017

VIA email to ADUEIS@seattle.gov

Dear Ms. Pennucci:

Councilmember Mike O'Brien has proposed to liberalize Seattle's regulation of accessory dwelling units (ADUs). His proposal would permit up to 12 unrelated persons to live on one single family zoned lot (up from 8 currently), allow absentee landlords of these ADUs (now prohibited), increase the height of ADUs beyond that allowed for adjacent single family homes, eliminate the requirement for any onsite car parking (now required), allow both ADUs and a Detached Accessory Dwelling (DADUs) on one single family lot (now prohibited), permit DADUs and ADUs on lots as small as 3,200 square feet (now limited to 4,000), expand the square footage of detached ADUs by 25% (up to 1,000 square feet), expand the rear yard that can be covered by DADUs by 50% (from 40 to 60 percent of the rear yard), have an exception from the height limit for projections like dormers overlooking adjacent homes, and expand the size of attached ADUs.

The Meadowbrook Community Council is opposed to any liberalization of existing ADU regulations and is providing the following comments regarding the environmental impacts which must be evaluated before any changes are made to the City's regulations regarding.

**ADVERSE TRAFFIC IMPACTS** The narrower streets in single family neighborhoods were not built with the width to accommodate dense communities. The proposal to allow a 250% increase (from 8 to 20) in residents on one lot will overwhelm the narrower neighborhood streets, causing more congestion and accidents. The proposal has no ameliorating regulations requiring ADUs to be located only on arterials or to require the City to take adjacent homeowners' front yards to construct wider rights of way. Forcing density into single family zoned areas without the better transit available downtown or in Hub Urban Villages, will cause a greater increase in vehicular traffic in Seattle than accommodating the growth in those areas design for less car use. Seattle already has some of the worst traffic congestion of any large US City. Liberalizing the ADU regulations will make it worse and increase car ownership by locating residents away from mass transit and adjacent bus routes.

**ADVERSE PARKING IMPACTS** Parking is a problem in many Single Family zoned neighborhoods. Proposal #2 would allow up to 12 unrelated adults to live on one single family lot with no off street parking provided. Estimates vary regarding the number of cars which would be owned by 12 unrelated people. A conservative estimate is 7 cars. With no parking required to be provided on the lot, this would result in 7 cars parked on the street near the lot. The typical street frontage probably provides 2 parking spots on the public right of way. Thus, one ADU lot would completely fill the parking in front of 3 1/2 lots, leaving no parking spaces for guests to any of those lots or for adjacent homeowners to park in front of their own homes.

**RISK OF INCREASED FLOODING** At the last major flood event in Meadowbrook, over 80 homes suffered flood damage from increased runoff from Thornton Creek. The City has acknowledged that the increased water flow in Thornton Creek is due to increased impervious surfaces in the Thornton Creek watershed. As more buildings cover the land, there is less exposed ground to soak up rain. The proposed liberalization of ADU regulations will allow for a significant increase in lot coverage by structures on a single family lot. Presently, larger developments are required to provide onsite

detention tanks to capture runoff from roof and other impervious surfaces. Single family lots are not required to provide any detention and can capture and direct the entire rainfall into Thornton Creek. Thus, the proposed liberalization of lot coverage by ADUs will increase impervious surface and lead to more frequent flooding of existing homes subject to flooding - and to flooding of additional low lying homes that are not now flooded.

**DESTRUCTION OF SALMON HABITAT** Increased stream flow from increased impervious surfaces due to greater lot coverage by structures has been identified as a cause of rapid runoff which destroys salmon spawning beds. Landowners who seek to profit from the destruction of the natural habitat by increasing the density of single family neighborhoods should have to pay a financial penalty for their damage to the environment.

**INCREASED HEIGHT, BULK, AND SCALE IMPACTS** The City's proposal to increase the height limit and size of buildings for ADUs in single family neighborhoods will harm the value of adjacent properties due to loss of privacy as bigger buildings in back and main yards look down on the yards of adjacent homes and project light, noise, building shadows, and loss of privacy onto adjacent homes. The proposal further exacerbates the loss of privacy by allowing increased window projections through the roof, to look down upon adjacent lots. It will damage the visual character of single family neighborhoods.

**INCREASED FIRE HAZARD** Allowing increased lot coverage by ADUs will increase the risk of a fire on one ADU parcel jumping to adjacent homes. In addition, people are a recognized source of fire. A 50% liberalization of the present regulation which sets a limit of 8 people on one lot – to up to 12 dwellers on one lot - will increase the number of people who could start a fire - which could spread throughout the neighborhood. In addition, in the event of a natural disaster (?earthquake?) when the Fire Department may not be able to respond to all fires in Seattle, this will cause fires to spread and burn more homes beyond those which fires would presently be able to burn.

**LOSS OF TREE CANOPY** The benefits of trees on the environment and humans are well documented. The City has a stated policy of increasing the tree canopy, which has suffered a precipitous decline in the last 40 years. The proposed liberalization of ADU regulations will allow for much greater lot coverage by buildings in single family zones. This means less land for trees on single family lots. Single family zones undoubtedly contain more trees than any of the other zoning categories so proposed changes will have an outsized harm to the City's tree canopy. Reducing the number of trees not only results in less cleansing of the air and lesser production of oxygen, it results in a lesser quality of life for humans. There is a reason people prefer walking in parks not covered with concrete and buildings.

Trees are documented as providing a cooling effect on the environment. If global warming is not a myth, then the City should be trying to increase the tree canopy, not have it chopped down.

**ABSENTEE LANDLORDS** The proposed liberalization will eliminate the requirement of having the owner live on site. On site owners will be able to immediately act to reduce noise, etc from out of control parties. Absentee landlords will not. Since an owner occupant lives on site in the neighborhood, they have more incentive to get along with their neighbors and not engage in conduct which alienates them. Having absentee landlords for lots with up to 12 residents increases the profits for absentee owners of ADUs but will harm the adjacent property values and quality of life of adjacent homeowners.

Increased density should be concentrated in areas that are designed for it – such as the downtown core and Hub Urban Villages. They have better access to mass transit, provide human services, and greater arterials to handle increased traffic – all of which is unavailable to single family neighborhoods.

The present zoning and regulations allow for adequate additional housing to be provided for future population growth in Seattle for some time into the future. The City correctly notes the additional housing to be provided by ADUs is not needed to provide for additional housing. It is justified by the former Mayor’s HALA report which called for “affordable” housing. We are not aware of any proof that ADUs will provide “affordable” housing. Apparently the current market rates are not “affordable”. If landlords are rational, they will charge a market rent for their properties. If the City decides to define market rent as not “affordable”, then no “affordable” housing will be provided by the additional ADUs.

There are a number of reasons why no city in the entire United States has adopted ADU regulations as liberal as those now proposed by Councilmember Michael O’Brien. No city allows both DADUs and ADUs on one lot. No city allows absentee landlords. Portland, Oregon adopted a more restrictive liberalization of its ADU regulations than proposed for Seattle and saw its permits for ADUs jump from 20-30 per year to over 500 per year. Seattle’s greater proposed liberalization and greater population growth than Portland would undoubtedly cause a much greater jump in ADU permits.

If any additional regulation is adopted, it should solely be to add enforcement teeth to the existing requirements, to prevent ADU regulations from being violated. Adjacent property owners should be authorized to file suit to take the profits i.e. rents from absentee owners violating the regulations. Presently, residents can take no personal action to stop violations.

At its regularly scheduled meeting, the Meadowbrook Community Council unanimously adopted the following resolution:

RESOLVED that the Meadowbrook Community Council endorses Alternative #1 of the City’s Accessory Dwelling Unit (ADU) proposal and urges the Seattle City Council not to make any changes to ADU regulations.

Sincerely,

The Meadowbrook Community Council

DAN KEEFE

Dan Keefe, President

**ADUEIS**

---

**From:** aileen langhans <aileenmargaret@yahoo.com>  
**Sent:** Monday, October 30, 2017 11:01 AM  
**To:** ADUEIS  
**Cc:** Aileen Langhans  
**Subject:** Comment letter regarding the City's proposed changes to ADUs and DADUs  
**Attachments:** Langhans letter about ADUs.docx

Dear ADUEIS scoping team,

The letter, enclosed as an attachment, is being submitted by the Langhans family alone and NOT in coordination with any organization, although we wholeheartedly support the official UPCC comment letter.

Sincerely,

Aileen M. Langhans

5215 19<sup>th</sup> Ave NE  
Seattle, Washington 98105  
October 30, 2017

TO: ADUEIS@Seattle.gov  
RE: Comment letter: AADU/DADU EIS Scoping

Dear ADU Scoping Staff:

**The Langhans family would like to officially and vigorously support the comment letter submitted by the University Park\* Community Club (UPCC). In addition, we would like to provide the following input:**

1. A recent study has shown a connection between dense urban living and compromised sleep health. Has the City of Seattle reflected on these negative impacts as it promotes serious increases in density within urban centers? Here is an excerpt from a study by sleep health specialist Professor Lauren Hale of Stony Brook University School of Medicine:

***“Studies show that short (<6.5 hours) and long (>8.5 hours) sleepers have higher health risks than mid-range sleepers. Living in a large city is associated with an increased risk of short sleeping of approximately 24%” compared to non-urban areas.... Controlling for demographic characteristics (e.g., age, race, education, occupation, marital status), health behaviors (e.g., exercise level, years of smoking, fat in diet), prior health conditions (e.g., body mass index, leg pain, and history of heart disease, hypertension, cancer, diabetes, stroke, bronchitis, emphysema, and kidney disease) and medication use, sleeping either a long or short amount increases the relative risk of all-cause mortality by up to 40 percent.”***

**Conclusions:**

***The results are consistent with the hypothesis that unhealthy sleep patterns among... large city residents may contribute to health differentials. This information can assist public health and health care professionals in identifying segments of the population that are at higher risk for sleep disorders or potential sleep-related disorders.... This research may guide social scientists to incorporate sleep and other biological variables into future analyses. And finally, it may build additional awareness of the importance of sleep hygiene to the non-sleep research community.”***

2. Several other changes, including reduced minimum lot sizes, maximum lot coverage, and locations for entrances, can lead to an increased risk of fire spreading from home to home and possibly getting out of control; this would also decrease any viable option for escape. These changes will definitely reduce the natural habitat for our non-human residents. Additionally, it can lead to concerns for privacy and respect. To promote and protect a vibrant, secure, and safe community, city and property owners must enforce certain standards of behavior, and combat negative impacts from garbage, noise, and other nuisances. If the city doesn't require owner occupancy, or at least a manager on site, such behavior must be controlled by stricter and enforceable regulations.
3. ***“The objective of this action is to remove regulatory barriers to ADU production, increase the number of ADUs constructed in Seattle, and allow flexibility for larger ADUs that could accommodate changing household needs and families with children. These policy changes would affect development in Seattle’s single-family zones.”*** Regardless of the city's desire to eliminate owner occupancy, the only examples provided to us have involved owner occupancy situations, such as this comment by Mr. Nicholas Welch: ***“Allowing more ADUs can also benefit homeowners who could benefit from a source of rental income.”*** This is further proof that the city continually fails to recognize the negative impacts already caused by aggressive absentee landlords.

We hereby request, once again, that the city provides at least one specific example proving its theory that allowing these absentee landlords and speculators to create ADUs and DADUs will directly produce a significant increase in

(\* ) Note that “University Park” is an official designation of our neighborhood, as listed on our deeds and included in the King County Assessor's Office.

various sized dwelling units within single-family neighborhoods. **We propose the following amendment: requiring an on-site manager in place of the owner occupancy rule, one that would be responsible for the behavior of the tenants, the maintenance of the units and property, and adherence to the RRIO regulations. Unfortunately, given that the city currently turns a blind eye to the illegal subdivisions within rental houses, we believe that these property owners will continue to engage in this method of increasing the number of units rather than applying for legal DADUs or AADUs.**

4. Responses to an email sent by Mr. Welch: Here are some excerpts:
  - a. ***“Over the course of this project, I’ve talked with many landlords who in fact live in Seattle, often in the same neighborhood as their rental property. Many take excellent care of their rental house and would be interested in creating housing for more people by adding an ADU, but current rules prohibit it.”*** This comment is just a deflection. We already have good relationships with most homeowners in our neighborhoods who also own rental units. They have proven to be responsible and dedicated to creating a true sense of community. While recognizing them is valid and appropriate, it is incomplete, if the city fails to also acknowledge the aggressive, out-of-town speculators whose only motive is profit. Not only do they cut up their houses with little regard to the safety and health of their tenants, permit requirements, code compliance, and legal registration under RRIO, they feel no obligation to be “good neighbors” to the adjacent homeowners. Because of their deep pockets, they are able to outbid families who would like to move into our neighborhood – a trend that will only increase should the city’s AADU/DADU regulations be expanded. Why? – they know they will easily recuperate those costs. These speculators, passively encouraged by the city to invade our neighborhoods, are simply biding their time until city code and zoning are changed to make it profitable to construct multi-family projects, ones that would decimate our unique family neighborhoods and eliminating their historic contributions. **Question: Does the city view its proposed regulations as the first step in totally eliminating its single-family neighborhoods by opening the floodgates to wealthy developers?**
  - b. ***“Yes, the proposed code changes would apply to all single-family zones. If there are rooming houses or nonconforming structures like the duplexes I mentioned, the code changes would apply because those structures are in single-family zones – but in general our current policy that these structures cannot increase their nonconformity by expanding or adding even more units would continue to apply.”*** This may seem reassuring to our neighborhood, until we realize that the city doesn’t have a reliable track record for limiting the number of adults per property. How can Seattle guarantee that it will enforce its policy against expanding the number of units, if it doesn’t even have an accurate count of the number of units currently in existence, not even through the RRIO process? There is no clear definition of a “dwelling unit”; and many rental properties in our neighborhood are illegally registered with RRIO as single-family houses, in spite of having eight or even more individually locked units with subleases. City officials must prove that it has the legal authority, appropriate staffing, and determination to control and stifle illegal proliferation of dwelling units under current law FIRST, before asking us to support any dilution of ADU/DADU regulations. **Question: What will prevent the city from deviating from this “current policy”?**
  - c. ***“The Code Compliance division of the Seattle Department of Construction and Inspections is responsible for investigating complaints about possible violations and for enforcement if an investigation finds there has been a violation.”*** The complaint department is not very effective or responsive, nor does it share its findings with the RRIO department, no matter how deleterious the violations are to renters’ safety and health. Apparently, the declaration that Seattle is “one city, one department”, as stated by Kathy Nyland of the Department of Neighborhoods, is just a ‘bumper sticker’ to pacify its citizens!
  - d. ***“Renters comprise more than half of Seattle’s population. Renters are particularly vulnerable to the impacts of rising housing costs. Housing costs have been increasing largely because we have lots of competition for a limited number of homes.”*** This comment exemplifies the city’s denial of how its proposed changes will continue to encourage the aggressive invasion of speculators – a destructive factor which prevents ordinary, middle-class families from purchasing affordable homes in our neighborhood. Instead, city officials want to promote the false conclusion that the rapid increase in property values is caused by the owner-occupied homeowners themselves. **A perfect example of the city’s denial is a single-family property now on the market for \$2.3 million. In spite of city and county records, it was drastically remodeled in 2015: 4 bedrooms have turned into 8; 1 ½ baths have turned**

**into 5 ¾ bathrooms; and an unfinished basement has been remodeled to include a large 2<sup>nd</sup> kitchen and 2<sup>nd</sup> master bedroom. Yet the city permit department has valued these changes at a mere \$20,000 and the new rooms are not being documented or taxed by the county. So much for affordable housing options!**

5. **“Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.”** This statement from the city’s proposal is most disturbing. Why is the AADU/DADU policy exempt from the stringent affordable housing demands outlined in the MHA? Weren’t the MHA regulations a product of HALA – the grand solution to the disappearing affordable housing stock throughout the city? **Question: If the HALA report recommended the ADU/DADU regulation changes, shouldn’t those changes be congruent with the absolute goals of HALA?**
6. The city’s refusal to acknowledge the true density and inventory of rental units creates a false baseline, against which it will then inaccurately measure any future gains and record any successes resulting from the new ADU/DADU regulations. This is tantamount to writing a victory speech before crossing the finish line. Instead, the city must build into its legislation numerous layers of precise, quantifiable, and meaningful standards and benchmarks, in order to monitor and adjust the program based on honest feedback during the implementation process. Unfortunately, the city can offer no reassurance, given its history of declaring victory upon passing legislation into law, before success can be achieved and proven to be the result of that new law.
7. Before Seattle rushes to adopt this city-wide solution to all the evils of single-family neighborhoods, perhaps it should acknowledge the current hidden density that exists in University Park and other similar neighborhoods. The City of Seattle must stop pitting groups against each other through false statements, declaring all single-family neighborhoods to be low-density communities dominated by those families that can afford their expensive homes. The fact is, hidden behind the front entrances of the houses which grace our neighborhood’s streetscape is a diverse density of dwelling units, if only Seattle would see beyond their visible facades. If the city really wants to protect our renters, those dwelling units should not only be counted, but registered and inspected.

**If** the city insists that our affordable housing stock is held hostage by homeowners, many of them empty nesters; **if** the city believes that our neighborhood doesn’t pull its weight in providing affordable housing for its rental population; and **if** the city demands that everyone be able to adapt to life in multi-family units; ... this strategy may further its “revolutionary cause”, but it does so at the expense of alienating the very people from whom the city seeks support. It also ignores and even dismisses the numerous homeowners and neighborhood organizations who love their city and work hard, in many quiet ways, to improve the quality of life for every Seattleite. For instance, the UPCC endorsed and advanced the city’s RRIO legislation from the very start.

We now await the city’s sincere acknowledgement of our issues, respectful consideration of our concerns, and honest effort to address any potentially adverse effects its proposals may have on the many unique single-family neighborhoods which make Seattle a truly special place to live, work, grow old, worship, and play (and a destination to be enjoyed by so many tourists and other visitors)!

Please rise to this serious challenge, as your final decision will have lasting impacts, far beyond your service to City Government. If the City cannot justify its litany of changes by offering concrete, realistic expectations and honest assessments of the practical application of these changes, then perhaps it should go back to the drawing board, and find solutions that won’t tear apart the very fabric of our neighborhoods, as warned in the City’s own DEIS document on its MHA policy.

Sincerely,

Aileen M. Langhans, for the Langhans Family  
U district residents since 1955  
206-522-0203; [aileenmargarget@yahoo.com](mailto:aileenmargarget@yahoo.com)

**PS. It is truly a tragedy to realize that this opportunity to comment on the potentially adverse impacts of the proposed ADU/DADU regulations was only provided by Seattle after an appeal process led the hearing examiner to require the city to do so. SO SAD!**

## ADUEIS

---

**From:** Joe Herrin <jherrin@heliotropearchitects.com>  
**Sent:** Monday, October 30, 2017 11:35 AM  
**To:** ADUEIS  
**Subject:** DADU EIS Scoping Comments  
**Attachments:** Joe DADU comments.pdf

Hello,

I submitted comments a week ago but have since that time learned more about the Scoping process and discussed the issue with many colleagues. I would like to amend my previous comments with the attached list of suggested areas of study.

Thank you,

Joe Herrin

Joseph Herrin AIA  
Principal, Heliotrope Architects  
or 206 764 6355  
or 206 849 4940  
[jherrin@heliotrope.com](mailto:jherrin@heliotrope.com)  
[www.heliotrope.com](http://www.heliotrope.com)

October 30, 2017

Aly Pennucci  
City of Seattle  
PO Box 34025  
Seattle, WA 98124

RE: Accessory Dwelling Units EIS

To Whom It May Concern:

Please consider the following in the EIS process:

- What impacts will greater building bulk and lot coverage have on tree canopy and vegetation, storm water control, and shading and sunlight to neighboring homes?
- How would the proposed changes, if fully implemented, impact traffic and congestion in Seattle's historic neighborhoods? Increasing density in the U District, for example, with its easy access to light rail and I-5, is quite different than Queen Anne, where no new transportation infrastructure is planned.
- What impacts will absentee ownership have on micro communities (within neighborhoods), property upkeep, local civic engagement and sense of community?
- If there is no owner occupancy requirement, how can the amount and impact of developer speculation be projected, especially if two ADUs are allowed on a single property? How will speculation impact lower & middle income home owners, and those lower valued properties? How will developer speculation impact the characters and qualities of neighborhoods? Which neighborhoods will see more speculation and how will this impact those neighborhoods?
- Study split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.
- What impact will increased numbers of ADUs have on solving the housing shortage if many of these units are built for the purpose of short-term rental (ie AirBnB)? The EIS study should analyze DADU both with a defined limit on short-term rentals and without a limit.

- How will these zoning changes affect property values? If the intent is more housing affordability, this should be measured both in terms of rental rate as well as cost to purchase a home
- Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.
- Study DADU development in association with a potential City construction loan program utilizing pool of MHA payments. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

Thank you,

Joseph Herrin AIA  
6602 E Green Lake Way N  
Seattle, WA 98103

**ADUEIS**

---

**From:** Martin Henry Kaplan <mhk@martinhenrykaplan.com>  
**Sent:** Monday, October 30, 2017 11:41 AM  
**To:** Pennucci, Aly; Welch, Nicolas; Freeman, Ketil; O'Brien, Mike; Johnson, Rob; Herbold, Lisa; Gonzalez, Lorena; Bagshaw, Sally; ADUEIS  
**Cc:** Jeff Eustis; Monrad Ellen; Don Harper; Margaret Okamoto; Beth Bunnell  
**Subject:** RE: ADU-EIS Request for Extension  
**Attachments:** EIS Request for Extension.pdf

**Queen Anne Community Council  
Land Use Review Committee  
Planning Committee**



**Good Morning;**

**Aly Pennucci, Council Central Staff  
Rick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw**

Pursuant to our request delivered to you last week on 10.26.2017 and attached herein, I am writing this morning to inquire as to if a decision is forthcoming. The timing is an obvious concern to thousands of citizens as your original close of comments, together with the scoping process we requested amended, is just two days away on 11.01.2017.

Thanks in advance for any update you can provide ASAP.

**Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair**

Queen Anne Community Council  
Land Use Review Committee  
Planning Committee



25 October 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Request for Extension and Revision for "EIS Scoping" Comment Period  
Request for at least 4 new Scoping Meetings representative of the entire city

Dear Aly, et al:

Pursuant to reviewing 'The Washington State Department of Ecology SEPA Online Handbook,' we have found that the City's process and procedure in advancing the beginning of the Backyard Cottage/ADU EIS process fails to consider many of the State requirements as outlined within the Handbook. We expect that the City will completely abide by the Hearing Examiner's [Findings and Decision](#) entered on 13 December 2016 in affirming and supporting our appeal. For example, she specifically states "Thus, the crux of this issue is transparency." Your public outreach and Scoping program fail to be transparent, inclusionary, lawful or respectful.

Therefore, the Queen Anne Community Council Land Use Review and Planning Committee formally requests that you pause the current process and commit to meet the law's requirement and extend the comment period at least 90 days to give adequate notice and complete the required public outreach, notice every neighborhood, and convene at least 4 legal 'Scoping Hearings' focused solely upon the EIS as noted in our successful appeal Decision last December 2016. This request is pursuant to your release of '[CITY OF SEATTLE - DETERMINATION OF SIGNIFICANCE \(DS\) AND REQUEST FOR COMMENTS ON SCOPE OF EIS.](#)'

Furthermore, we request that these meetings take place in the four corners of our city and involve true public outreach to all neighborhoods and citizens, not just Backyard Cottage advocates and land use interests who know how to connect with the City's online calendar.

Furthermore, we request that these Scoping Hearings involve true and honest discussions of more than one alternative and include a rich, inclusive, and diverse public hearing and Q/A to educate you and your staff, the interested public and your EIS consultants as to the extent of specific environmental impacts for which many citizens may be most concerned.

## Background

1. Our successful appeal of the SEPA DNS, was founded upon the lack of analysis given to well over a dozen proven environmental impacts. In addition, the Hearing Examiner agreed that simply holding two very limited 'marketing' meetings to gather support for CM O'Brien's legislation failed to represent a cross section of over 125,000 properties that could be impacted.
2. These two meetings, attended by less than 100 people each, were the only chance for public input and no neighborhoods or interested individuals were notified; only those who signed up for CM O'Brien's updates which mostly included Backyard Cottage advocates and no one in opposition.
3. After five months, CM O'Brien decided to respect the Hearing Examiner's decision and advance a complete EIS that would include a transparent and inclusive public involvement process. I discussed with you many times during this year what that process might look like, requesting that you schedule at least 4 'Scoping Hearings' around our city and include a committed and overwhelming public outreach as this proposal impacts every single-family neighborhood in Seattle together with well over 300,000 Seattleites. Relying upon the city's online calendar together with those few citizens who have signed up for CM O'Brien's updates would be unacceptable. The State's EIS Handbook clearly states "

### **3.1 Encouraging Public Participation in the EIS**

**'Agencies are encouraged to think beyond regulatory requirements in determining how best to inspire public participation and create interagency cooperation...'**

**In developing the public participation plan, the lead agency should consider the value of:**

- Mailings, such as newsletters, project updates, etc.;
- Public notices (e.g., paid announcement in the newspaper);
- Radio announcements;
- News releases;
- Internet web pages;
- One or more public hearings during scoping and draft EIS comment periods; and/or
- Public or interagency meetings.

**Individual public involvement activities may take several weeks of prior preparation and should be carefully planned. This advance planning is particularly important for ensuring that adequate public notice is given.**

4. In addition, you have completely changed the name of the proposal and wiped clean from any documentation the former name of 'Backyard Cottage.' Your 'new' ADU has been called a DADU and Backyard Cottage since 2006. This change has left citizens blind concerning the original Backyard Cottage legislation for which they had strong opinions. Many citizens have commented that they had no idea that the ADU-EIS had anything to do with Backyard Cottages. You have not connected the two titles and definitions in any way, leaving thousands unable to connect the current EIS with the Backyard Cottage legislation and appeal advanced and supported last year.
5. In addition, the sole basis for CM O'Brien's legislation last year was based upon his identifying Backyard Cottages as providing a solution Seattle's affordability crisis in Seattle. This focus too has been wiped clean from the new documentation. In our appeal we proved, and the City's own witnesses agreed, that Backyard Cottages are not affordable housing.

6. In your release, you identified only two alternatives to be studied. It is common for the public and consultants to have the opportunity to review at least three alternatives that include a 'no action,' a medium proposal, and the greater proposal that you have advanced. Where is the third medium proposal?
7. In your released '[CITY OF SEATTLE - DETERMINATION OF SIGNIFICANCE \(DS\) AND REQUEST FOR COMMENTS ON SCOPE OF EIS](#),' you note you are "hosting this open house to discuss two topics related to how we grow and build housing in Seattle."

The Seattle Department of Neighborhoods is hosting this open house to discuss two topics related to how we grow and build housing in Seattle.

Topics discussed will include:

**Comprehensive Plan Amendments** - The City of Seattle is working to ensure that the language in existing Neighborhood Plans is consistent with the 2016 Comprehensive Plan and Mandatory Housing Affordability (MHA), a proposed policy that would require developers to contribute to affordable housing. You will have a chance to review Neighborhood Plan language and help choose new language that is consistent with the City's updated vision and plan. Neighborhoods involved: Aurora-Licton Springs, Fremont, Northgate, Roosevelt, Wallingford.

**Accessory Dwelling Units (ADU)** - The City of Seattle is asking for ideas on what Environmental Impact Statement (EIS) that will study the effects of removing barriers to creating accessory dwelling units (ADUs) and backyard cottages. An ADU is a secondary unit inside, attached to, or in the backyard of your home. We want to help you understand the purpose and process of the EIS and find out what is important to you. Neighborhoods involved: CITYWIDE.

**We invite residents throughout Seattle to join us for these open houses and offer your input.**

8. We respectfully suggest that these two "Open Houses" are not Scoping Hearings as defined and directed in common EIS procedures and within The Washington State Department of Ecology SEPA Online Handbook which defines Scoping as the following clipped form the Handbook:

### **3.2 Scoping**

Scoping is the first step in the EIS process. The purpose of scoping is to narrow the focus of the EIS to significant environmental issues, to eliminate insignificant impacts from detailed study, and to identify alternatives to be analyzed in the EIS. Scoping also provides notice to the public and other agencies that an EIS is being prepared, and initiates their involvement in the process.

The scoping process not only alerts the lead agency, but also the applicant to areas of concern and controversy early in the process. As a result, it offers more opportunities for the applicant to consider and explore means to address the concerns. From an environmental perspective, this can result in changed proposals with fewer environmental impacts.

During scoping, any suitable means to promote agency and public communication and participation appropriate to the specific situation is encouraged.

The Open Houses you scheduled do not meet the State law governing Scoping Meetings. These two meetings are simply gatherings to market the shared city's proposals for the Comp Plan amendments, MHA, and ADU.

In conclusion, we feel strongly that the City has failed to uphold the law as referenced above and clearly articulated within the [State of Washington SEPA Handbook](http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch03.html#3.1) accessed via the link below: <http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch03.html#3.1>

Therefore, we request that you immediately revise the Scoping schedule pursuant to the law and respect for all Seattleites and “inspire public participation” by developing an appropriate and acceptable “participation plan.” This participation plan should include a wide commitment to reach most citizens as referenced in the Handbook and schedule at least 4 public meetings in the 4 corners of our city to conduct transparent and inclusive Scoping Hearings solely devoted to the Backyard Cottage/ADU issue and not diluted by other distractions, and unrelated proposals and initiatives as you have currently scheduled.

This cannot be just shoved through – the EIS process and schedule must take the appropriate amount of time to respect and inform over 300,000 Seattleites whose properties WILL be impacted. These include property owners, renters, over 30 neighborhoods and communities.

Finally, as the Handbook directs, “**Individual public involvement activities may take several weeks of prior preparation and should be carefully planned. This advance planning is particularly important for ensuring that adequate public notice is given.**”

We would look forward to partnering with you in helping you design a lawful, acceptable and responsible public outreach and Scoping program.

Thank you for your immediate attention,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

**ADUEIS**

---

**From:** Horbelt, Cristofer  
**Sent:** Monday, October 30, 2017 1:47 PM  
**To:** ADUEIS  
**Cc:** Burrell, Kevin; Madura, Jalaine  
**Subject:** Accessory Dwelling Units Environmental Impact Statement  
**Attachments:** ACCESSORY DWELLING UNITS ENVIRONMENTAL IMPACT STATEMENT\_Final.docx

Please accept the attached comments on behalf of Seattle Public Utilities - Drainage and Wastewater Line of Business. Thanks. CKH

**Cristofer Horbelt**

Wastewater Policy Advisor  
 Seattle Public Utilities – Drainage and Wastewater  
 Physical Address:  
 700 - 5th Ave, 44th floor  
 Mailing Address:  
 700 Fifth Ave, Suite 4900  
 P.O. Box 34018  
 Seattle, WA 98124-4018

Ph: 206-233-2527  
[cristofer.horbelt@seattle.gov](mailto:cristofer.horbelt@seattle.gov)

---

From: Madura, Jalaine  
 Subject: Accessory Dwelling Units Environmental Impact Statement  
 Importance: High

All,

We have received the attached Determination of Significance and Request for Comments on Scope of EIS from the Seattle Department of Construction and Inspections for the **Accessory Dwelling Units Environmental Impact Statement**.

The scoping handout, available at the link below, notes that public services and utilities has been preliminarily identified as an element to be included for analysis of potential impacts.

<http://www.seattle.gov/Documents/Departments/Council/ADU-EIS-Scoping-Handout.pdf>

The deadline for comments on the scope of the EIS is November 1<sup>st</sup>. If you intend to submit comments or are aware of plans for doing so, please let me know ASAP so I can confer with you or whomever may be on point for SPU's review.

As always, please share this email with others in the utility as you think appropriate.

Thanks, everyone,

JM, 6-4064

[Jaime Madura](#)

SEPA Administrative Coordinator, Corporate Services Division

City of Seattle, [Seattle Public Utilities](#)

O: 206.386.4064 | [jaime.madura@seattle.gov](mailto:jaime.madura@seattle.gov)

[Facebook](#) | [Twitter](#)

## ACCESSORY DWELLING UNITS ENVIRONMENTAL IMPACT STATEMENT

Seattle Public Utilities

Drainage and Waste Water Line of Business Comments

### **Drainage (Stormwater) Comments**

Drainage systems are designed based upon assumptions of the type of developed land cover, return period / frequency and storm duration / intensity. The variable which could be effected by these proposed Alternatives relates to developed land cover. Both of the proposed Alternatives limit lot coverage to 35% of the lot area, which is consistent with the underlying requirements of the SFR zoning.

Neither alternate should directly lead to increased amounts of impervious surfaces beyond what is currently allowable, and therefore should not have a measurable impact on the drainage system.

### **Wastewater (Sanitary Sewer) Comments**

Sewage volume normally consists of sanitary wastes, industrial wastes, ground water infiltration and stormwater inflow (I&I). The average daily flow for sanitary waste can be estimated based upon per capita water usage for different population densities, employment types, and typical industrial waste volumes, and are referred to as “dry weather flow”, contrasted with “wet weather flow” which includes I&I.

Water conservation measures enacted since the majority of the wastewater system has been constructed have led to decreasing potable water usage which leads to a decrease of sanitary wastes.<sup>1</sup> In this respect, the proposed Alternatives would generally not be expected to exceed the total design assumptions for sanitary waste (which assumes no water conservation) in the residential zones.

There are specific locations within the wastewater system, however, which are at or exceeding capacity, if there were to be a large concentration of ADUs constructed in an area tributary to these problems, there would likely be a corresponding rise in sanitary sewer overflows (SSO's). Please see the attached map submitted in conjunction with these comments showing these locations.

SPU is currently refining the hydrologic models used to analyze system capacity and will have more accurate information in 2018.

ADUs constructed in basements present a specific flooding concern. SPU strives to operate a gravity sewer system but there are times, usually during wet weather events, that the system surcharges and conditions are present where sewage can back up into buildings unless certain precautions are employed. SPU recommends that when converting areas below grade to ADUs (or to any other habitable space) that they should demonstrate compliance with the requirements of Seattle Plumbing Code section 710:

#### **710.0 Drainage of Fixtures Located Below the Next Upstream Manhole or Below the Main Sewer Level.**

---

<sup>1</sup> Seattle and the nearby cities and water districts that comprise the Saving Water Partnership have seen a 20% decrease in regional drinking water use – with no decrease in customer satisfaction - from 2000 to 2010. The four main contributors to this decrease include Conservation programs saving 9.6 mgd, Improvements in water system operations, setting water rates that encourage the wise use of water and adopting building codes and appliance standards that make efficient fixtures and appliances the norm. Source: SPU Water LOB

## ACCESSORY DWELLING UNITS ENVIRONMENTAL IMPACT STATEMENT

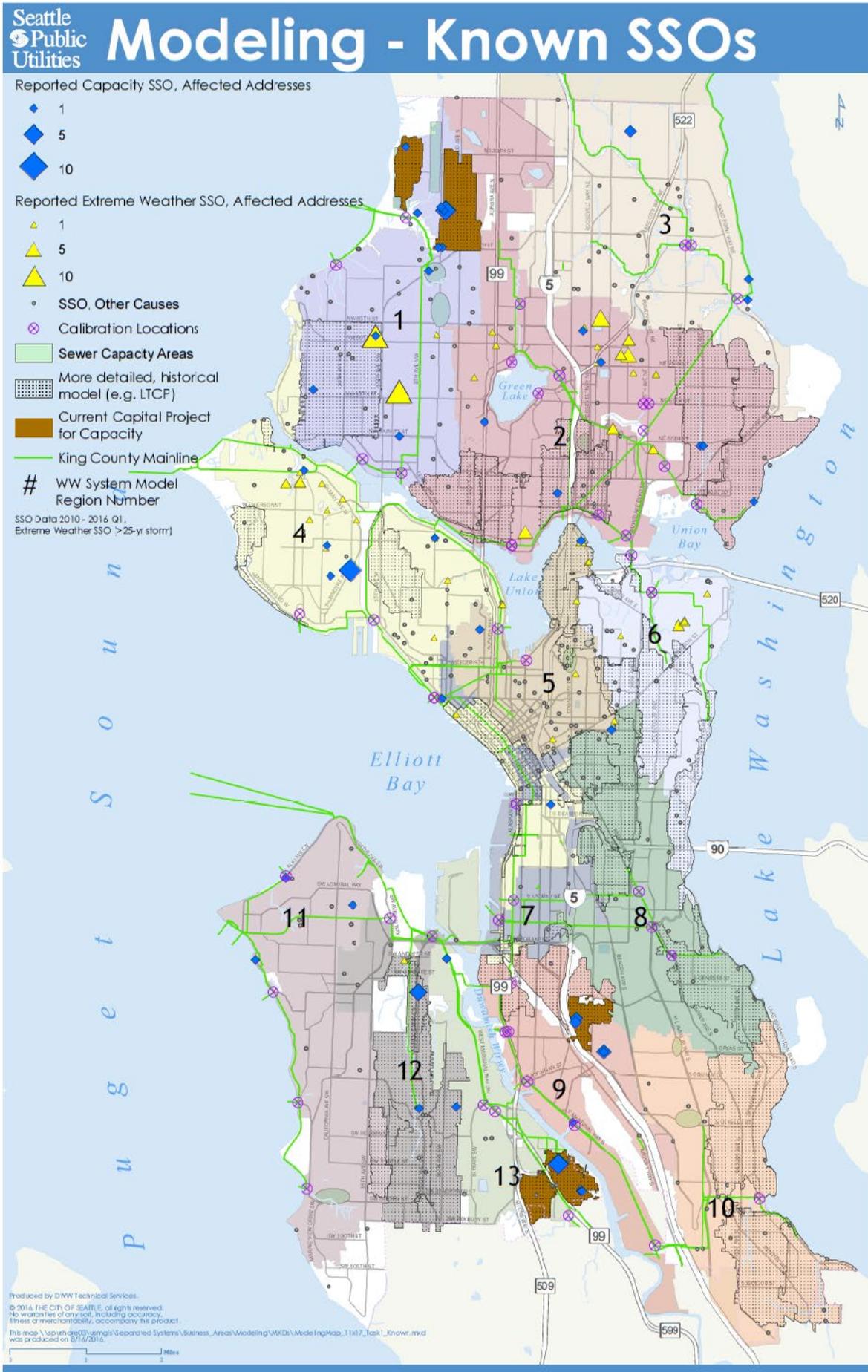
### SPU DWW LOB Comments

**710.1 Backflow Protection.** Where a fixture is installed on a floor level that is lower than the next upstream manhole cover of the public or private sewer, serving such drainage piping, shall be protected from backflow of sewage by installing an approved type of backwater valve. Fixtures on floor levels above such elevation shall not discharge through the backwater valve. Cleanouts for drains that pass through a backwater valve shall be clearly identified with a permanent label stating “backwater valve downstream”.

**710.2 Sewage Discharge.** Drainage piping serving fixtures that are located below the crown level of the main sewer shall discharge into an approved water-tight sump or receiving tank, so located as to receive the sewage or wastes by gravity. From such sump or receiving tank, the sewage or other liquid wastes shall be lifted and discharged into the building drain or building sewer by approved ejectors, pumps, or other equally efficient approved mechanical devices.

### Operational Comments

Aging infrastructure and changing weather patterns are other variables that are impacting the drainage and wastewater systems. As the drainage and wastewater system gets older, there can be differential settlement between pipes and the pipe material itself can wear and deteriorate over time. What were once considered 25-yr storms, 3.125 inch/24 hour, are now occurring more frequently at closer to a 5-yr return interval, 3.04 inch/24 hour. Increasing amounts of I&I can be attributed to both the condition of older infrastructure and the changing storm values. This has the effect of using a portion of the additional capacity which resulted from decreasing potable water use.



## ADUEIS

---

**From:** Patricia Akiyama <pakiyama@mbaks.com>  
**Sent:** Monday, October 30, 2017 2:28 PM  
**To:** ADUEIS  
**Cc:** Nick Harper  
**Subject:** ADU Comment Letter  
**Attachments:** SeattleEIS\_ScopeADUsOctober2017Letter.pdf

Dear Aly,

On behalf of Nick Harper and the Master Builders of King and Snohomish Counties, I'm submitting the attached comment letter for Seattle's ADU EIS Scoping process. Please contact Nick or me with any questions:

[nharper@mbaks.com](mailto:nharper@mbaks.com)

[pakiyama@mbaks.com](mailto:pakiyama@mbaks.com)

Best regards,  
Patricia



**Patricia Akiyama**

External Relations Manager

Master Builders Association of King & Snohomish Counties

p 425.457.7087 | m 425.480.1840

335 116<sup>th</sup> Ave. SE | Bellevue, WA 98004

[mbaks.com](http://mbaks.com)



October 30, 2017

Ms. Aly Pennucci  
PO Box 34025  
Seattle, WA 98124-4025  
RE: Accessory Dwelling Units EIS Scoping

Dear Ms. Pennucci,

On behalf of the Master Builders Association of King and Snohomish Counties, I am writing to urge careful review and support for Alternative 2 of the proposed Accessory Dwelling Units (ADUs) EIS. Alternative 2 addresses many of the existing regulatory barriers, and will enable an increased number of ADUs, Attached Accessory Dwelling Units (AADUs) and Detached Accessory Dwelling Units (DADUs) in single-family zones located outside urban villages across the city. This approach will provide new and desperately-needed housing in our fast-growing region.

Updating Seattle's regulations to allow more ADUs and DADUs is an important initiative to foster a range of solutions needed to increase housing supply, affordability and accessibility. It calls for practical, effective and equitable process improvements that will eliminate unnecessary and costly hurdles without in any way compromising environmental protections.

Recognizing that our region faces an urgent and significant affordable housing crisis, the Master Builders Association of King and Snohomish Counties (MBA) believes that it is essential for all stakeholders and all levels of government to collaborate on solutions to ensure housing opportunities for all.

The MBA is the largest residential home builders' association in the United States. With nearly 3,000-member companies, the MBA is dedicated to membership value, housing advocacy, community service, and financial stewardship throughout the Puget Sound region. The MBA strives to make the quality of life in the Puget Sound region among the best places in the world to live. We commit to ensure that all people can attain housing. We pledge to make positive impacts through our advocacy, community, and philanthropic outreach efforts. We will remain the regional leader in residential and green building advancements. Our duty is to make certain everyone has access to a healthy and productive place to call home.

Please feel free to contact me if you have any questions or would like more information.

Sincerely,



Nick Harper  
Senior Director, Strategy & Policy



## ADUEIS

---

**From:** Michelle Eggert <michelle@blaurei.com>  
**Sent:** Monday, October 30, 2017 3:22 PM  
**To:** ADUEIS; Pennucci, Aly  
**Subject:** ADU-DADU EIS Input  
**Attachments:** Eggert.ADU-DADU.Input.2017.10.pdf

Aly, Team HALA/MHA,

Thank you for all the hard work you are doing!

Attached please find my input the ADU-DADU EIS.

Summary is below, details in attachment.

- 1) Allow flexibility to have existing structure designated as DADU and new Primary+ADU be built.
- 2) Allow ADU and DADUs to be RVs (licensed) or Tiny Houses (built to RV standards and licensed)

Michelle Eggert  
Manager  
425-246-4197  
michelle@blaurei.com

Blaui Real Estate Investments LLC  
4701 SW Admiral Way, Unit 251  
Seattle, WA 98116



October 30, 2017

Hello Team HALA/MHA,

I am excited about the options that the ADU-DADU Alternative 2 offers!  
However, I feel that it is rather narrow and should be expanded to include more variations of ADU-DADU.

**1) Allow flexibility in designating which structures on the lot are the DADU and which are the Primary Structure+ADU.** If the existing primary structure is under 1000 sq ft (living space only, excluding garages, storage, unfinished basements), then existing structure may be designated as the DADU, and a new PrimaryStructure + ADU (duplex) may be constructed on the rest of the lot. Thus, it will be possible to have a DADU at the front of the lot, and the PrimaryStructure+ADU at the back of the lot.

**2) Permit the DADU and ADU to be a RVs or tiny houses (built to National NFPA 1192 Trailer Code, DOT compliant, licensed as an RV trailer).** Require that homes are fully licensed and include toilet, bathing and cooking facilities.

Allow utility hook-ups to be modified to add mandatory hookups for water, sewer, and electricity for each RV or TinyHouseRV.

Utilities: owner/builder will have the option of separate electricity and water meters for the DADU and ADU. Metering may be provided by Utilities (Seattle City Light and Seattle Public Utilities) or via private submetering, or only one set of meters for all units.

May require revisions to parking codes. By allowing parking-living of RV with RV parked on the side lot or rear lot of house.

Our family has a mobile home park in King County. We have had RVs for 20+ years. The RVs tend to be high end houses, very well cared for, who also take great care of the landscaping. **They are excellent tenants and great neighbors.**

Tiny houses are a nationwide new trend in home ownership. Tiny house organizations report the largest barrier to tiny home ownership is finding land to park the house on. Due to land use regulation. Seattle can become a nationwide leader in allowing tiny houses in residential zoning!

Best regards,

*Michelle Eggert*

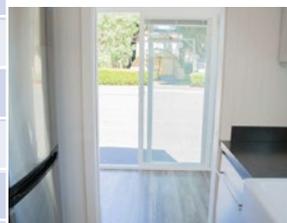
Michelle Eggert  
4701 SW Admiral Way  
Seattle, WA 98116  
michelle@blaurei.com

<https://seattletinyhomes.com>



<http://www.tinymountainhouses.com/>

Mt. Hood	
Total Square Feet	333 sq ft
Main Floor	201 sq ft
Master King Loft	92 sq ft
Twin Loft	39 sq ft
Sleeps	4-6
House Width	8' 6"
House Length	24'
House Height	13' 5"
Ceiling Height	10' 8"
Height To Loft	6' 9"
Loft Height	44"
Base Price	\$58,990



<http://www.tinymountainhouses.com/>



# TINY HOUSES

<http://thetinylife.com/what-is-the-tiny-house-movement/>

*And the people who live in them*

The tiny house phenomenon redefines what makes a house a home, empowers the people for a better future and leads a movement that breaks the mold every day. Tiny house people come from all walks of life. This is their story.



**SIXTY-EIGHT PERCENT** of tiny house people have no mortgage, compared to 29.3% of all U.S. homeowners.<sup>1</sup>

## YOU CAN BANK ON IT



55% of tiny house people have more savings than the average American, with a median of \$10,972 in the bank.

## A HOME THAT YOU OWN



78% of tiny house people own their home, compared to 65% of homeowners with traditional houses.<sup>2</sup>

## ✂ THE REAL COST OF HOUSING ✂

The average cost to build a tiny house is \$23,000 if built by the owner.



The average cost of a standard-sized house is approximately \$272,000.<sup>3</sup>



Add \$209,704 interest on a 4.25% 30-year loan and it's \$481,704!



## TINY HOUSE, BIG LIVING



The average tiny house is 186 sq/ft while the standard U.S. house takes up nearly 2100 sq/ft. That adds up to nearly 11.3 Tiny Houses!<sup>4</sup>

## APPROXIMATELY 2 OUT OF 5 TINY HOME OWNERS ARE OVER

**50 YEARS OF AGE**

## ISLAND SAVINGS TIME

**32%** of tiny house people have more than \$10,000 saved for retirement.

**62%** of tiny house people have less than \$5,000 saved for retirement.



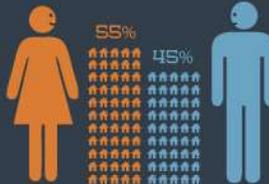
## GIVE YOURSELF SOME CREDIT

89% of tiny house people have less credit card debt than the average American, with 65% of tiny house people having zero credit card debt.<sup>5</sup>



## THE FAIRER SEX WINS

More women own tiny houses than men.



**\$42,038**

per capita income of tiny house people.

**EARNING \$478** more annually than the average American.



Tiny house people are twice as likely to have a masters degree, while they are on par with the average college graduation rates.



Sources:

- 1- <http://www.latimes.com>
- 2,3,6 - <http://www.census.gov>
- 4 - <http://www.nahb.org>
- 5 - <http://www.nerdwallet.com>



[www.pinterest.com](http://www.pinterest.com)



**ADUEIS**

---

**From:** aileen langhans <aileenmargaret@yahoo.com>  
**Sent:** Monday, October 30, 2017 10:35 PM  
**To:** ADUEIS  
**Cc:** Aileen Langhans  
**Subject:** Comment Letter from UPCC  
**Attachments:** Formal UPCC comment letter on ADUs during the Scoping Process.docx

Dear Scoping Staff for the ADU EIS process,

Enclosed, as an attachment, is the official comment letter from University Park Community Club (UPCC).

Thank you for the opportunity to participate in a productive discussion.

Sincerely,

Aileen M. Langhans

# UNIVERSITY PARK COMMUNITY CLUB

5215 19<sup>th</sup> Ave NE, Seattle, 98105

October 30, 2017

TO: ADUEIS@Seattle.gov

RE: University Park Community Club: Comments on Accessory Dwelling Units (ADU) – for the Environmental Impact Statement (EIS) Scoping

Dear ADU Scoping Staff:

University Park is a single-family zoned neighborhood north of the University of Washington (UW) Greek Row. Our borders are: Ravenna Park to the north; NE 50<sup>th</sup> Street to the south; 16<sup>th</sup> Ave NE to the west; and 21<sup>st</sup> Ave NE to the east. Because of our close proximity to the University, many properties have been altered into student rental houses. A number of these properties are owned by absentee landlords and are frequently poorly managed and maintained. Overall, the UW estimates that 6,000 students reside north of campus, including a large percentage in the University Park Neighborhood. In addition to the absentee landlord rental properties, a significant number of resident homeowners also rent out rooms. As a result, the city's official inventory of dwelling units is misleading, as it drastically underestimates the true total number of residents in our community. University Park, in actuality, is one of the densest census tracts in the city of Seattle.

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. The fact is, University Park encourages ADUs on owner-occupied properties, as is allowed under current law. But, we do have serious concerns regarding the City's efforts to drop the owner-occupancy mandate under the new proposal; and we have concrete evidence to support those concerns. Between 1957 and 1975, the southern section of University Park (south of NE 55<sup>th</sup> Street) was zoned duplex. Consequently, many non-conforming duplexes, and illegal duplexes and triplex still exist within our boundaries, in spite of the current "single family" zoning. Our de facto 'land use' situation should be viewed as a warning on how any neighborhood at risk might be negatively impacted should the city eliminate the owner-occupancy requirements, which it originally inserted into law in order to protect those same neighborhoods.

Unfortunately, Seattle has no effective tools to enforce the reasonable management of rental units. The Rental Registration and Inspection Ordinance (RRIO) is helpful, and was initially supported and promoted by the UPCC; but because of poor implementation and enforcement, many existing dwelling units were never recognized or recorded during the application process. Thus, the true number of renters is blatantly and vastly underestimated; and, because many units are never officially documented, they escape any meaningful inspection.\* The complaint process is also ineffective, due to laws which tie the hands of our city employees, limiting their ability to follow up on reports of illegal remodeling or other construction, even after evidence is provided by the person initiating that complaint. More disappointing is the fact that the RRIO was passed to ensure healthy and safe rental units, yet it doesn't cover garbage strewn around the properties, overflowing garbage cans which are permanently left on the sidewalk/planting strips, illegal parking on front yards, party noise and the like. While there are mechanisms in place to deal with such issues, they are all complaint based and ineffective.

(\* ) RRIO regulation requires each dwelling unit, as defined by a locked door and/or sub-lease, be registered

In our experience, quality of life issues in rental units, especially those lacking an on-site owner or manager, will be further magnified should the city adopt more lenient ADU/DADU regulations by eliminating owner-occupancy. This drastic step will only encourage a rapid increase in absentee landlords, speculators, and deep-pocketed developers, such as LLC entities, and incentivize them to more aggressively outbid those families who are seeking home ownership, by offering well above the asking prices for properties that are often sold without any visible “for sale” signs. Unfortunately, in spite of the city’s bold declaration that it wants to protect families from skyrocketing house values and rents, families are actually being displaced by its well-intentioned, but faulty policies.

From a broader perspective, during the years of 2006 to 2009 the Seattle Planning Commission (SPC) consulted with experts and professionals from around the country to identify potentially adverse impacts to single-family properties and neighborhoods. The current code, “Option 1”, reflects their very serious effort to positively impact any legislation aimed at significantly increasing densities in the numerous single-family areas of Seattle. But, “Option 2” seeks to overturn every code that the SPC and its experts deemed critical to protecting and preserve our neighborhoods, while increasing affordable density. This is in spite of Seattle’s study of 59 cities across the country, none of which have codes allowing what is now being proposed in “Option 2”. From our perspective, the “No-change Option 1” should not be denounced as “NIMBY”; it should be viewed as validation of the extensive and dedicated work previously completed by the SPC and enacted into law after much deliberation.

On-street parking in University Park Neighborhood is another chronic issue which has led to the establishment of an RPZ zone (Zone 6), in cooperation with the UW. Even with proper enforcement, our area’s residents still have difficulty finding a place to park. That problem has been further exacerbated by the city’s decision to forego parking requirements for new multi-unit properties in Urban Centers (specifically the University District), based on a false assumption that their residents have no need for cars because of easy access to mass transit. A typical example is the new 40-unit apartment on 15<sup>th</sup> Ave NE, which lies just outside the perimeter of our neighborhood but within the RPZ Zone 6 area: although the property was exempt from on-site parking due to nearby major metro bus routes to the University District, Husky Stadium light rail station, and downtown, 40% of its residents apply for RPZ permits.

The assumption that eliminating the ADU/DADU off-street parking requirements will reduce competition for parking spaces is capricious thinking. As reported in *The Seattle Times*, the number of vehicles in Seattle reached 435,000 in 2015, a 12% increase from five years earlier; the corresponding demand for parking will continue to rise as the city population rapidly approaches 700,000 households, due to the anticipated influx of 115,000 new jobs over the next 18 years. The Seattle Department of Transportation, already in a near panic mode, has now developed a new plan to tap unused parking spots in private lots and buildings, while simultaneously failing to acknowledge the city’s own role in creating the mess in the first place. Its new policy of ‘flexible parking’ will not have any measurable positive impact in University Park, given our already dense census tract and maximum use of off-street and on-street parking. But, the blanket, one-size-fits-all, city-wide, solution of eliminating the ADU/DADU parking requirement pushed by the city completely ignores the unique and diverse impacts that will unevenly and deleteriously effect its many neighborhoods.

It must be reiterated that the Seattle Planning Commission’s comprehensive study led to a proposal which supported Backyard Cottages (ADUs/DADUs) while also preserving the character of the various neighborhoods that make Seattle so special; like the other cities in that study, an important goal was to limit the number of residences per lot. They determined that limiting accessory units to no larger than 800 square feet on a 4,000-square foot lot would be reasonable, given other codes defining single-family properties: open space, set-backs, tree canopy preservation, lot coverage, and water run-off issues. University Park, similarly to other Seattle neighborhoods, has small parcels (4,000-5,000 square foot), with the infrastructure engineered, designed, and constructed, and ultimately sized to accommodate one-family homes per lot, through creative architectural adaptations to maximize the use of narrow lots. 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.”***

While owner occupancy and off-street parking requirements are of primary concern to our community, it is clear that the proposed changes in “Option 2” are only beneficial to developers and speculators. “Option 1” regulations were and are still considered to be in the best interest of all city residents and neighborhoods.

Here’s a wakeup call to city officials and departments: do not be deceived by the individual homes that grace the streetscapes of the University Park Neighborhood. That view is misleading! It denies the hidden, abundant, and yet uncounted rental units, which will continue to multiply as the city fails to enforce its laws and as absentee landlords seek to maximize the capacities of and profits from their rental properties. The city needs to admit that it has passively allowed these houses to be falsely registered as single-family homes, no matter how subdivided they are. The density in University Park is more than some wish to acknowledge and forcing “Option 2” on us and other neighborhoods will negatively impact our essential quality of life expectations. Time is running out for Seattle to reset its commitment to the city’s vibrant and diversified single-family neighborhoods. Let’s make sure that any long-term legislation acknowledges and addresses their concerns, fears, and hopes.

Sincerely,

Aileen M. Langhans, secretary  
On behalf of the UPCC board

206-522-0203  
[Aileenmargaret@yahoo.com](mailto:Aileenmargaret@yahoo.com)

**ADUEIS**

---

From: Ted and Alison Inley [mailto:inksea@earthlink.net]  
 Sent: Monday, October 30, 2017 4:57 PM  
 To: Welch, Nicolas <Nicolas.Welch@seattle.gov>  
 Cc: alice poggi <avpoggi@hotmail.com>; Levy, Susie <Susie.Levy@seattle.gov>  
 Subject: EIS for DADU/ADU changes - follow up

This follows up on our discussion at the open house at Hale's Palladium last week. First, I've attached the letter and memo that the Phinney Ridge Community Council originally sent in March, 2016. The memo sets out our group's position with respect to the proposed code changes, and summarizes community opinion as reflected in a Survey Monkey survey which we conducted online. I would like both documents to be made a part of the record with respect to the EIS, and ask that the suggestions we made in the letter be considered as part of the EIS.

During our conversation I mentioned that the results of our survey have not been included in the City's summary of public input regarding the proposed code changes as reflected on your Backyard Cottage/DADU web page. I asked that they be so included, as the only public input summarized by the City thus far that I have seen is from backyard cottage owners or potential builders who favor the changes.

I have documents that contain more detail concerning the results of our Survey Monkey survey if you wish.

Lastly, I mentioned during our conversation that Council Member O'Brien has told me that he did not intend to essentially eliminate owner-occupancy requirements, as the current proposed legislation would do. (He did not tell me how he would modify that requirement.) If the legislation's sponsor does not intend to introduce the present version of the ordinance with respect to owner-occupancy, I wonder why the City is examining it and not the version he intends to introduce.

Thanks for your time and attention.

Ted Inley

## **Personal Stories from Backyard Cottage Owners**

"My backyard cottage is for my Mom, who at 80 years old needs to be close but is not ready for assisted living."

"Our original intent was a glorified garage with electrical and plumbing, as a short-term place for friends to stay. The permitting process forced us to expand the project into a more traditional living space. Now that it is a full blown space (kitchen with range, washer / dryer, loft, etc.) we love the rental income (from a long-term tenant)."

"My neighbors really like the cottage and often stop by to say so, or ask how they might build one. One reason it worked well for me is that I already have a very small house (650 sq ft) and adding the cottage doesn't overwhelm the space."

"I was looking for two houses on one lot when I bought this house. I needed the second income as a single woman."



March 12, 2016

Seattle Mayor Ed Murray  
Seattle City Council Members  
Nick Welch, Office of Planning and Community Development  
Thomas Whittemore, Department of Neighborhoods  
Seattle City Hall  
600 Fourth Ave. 2nd Floor  
Seattle, WA 98104

Re: Backyard cottage development; online community survey and PRCC position  
on proposed changes

*via: US Mail and email*

Dear Mayor Murray, Council Members, Mr. Welch and Mr. Whittemore,

We are writing on behalf of the Phinney Ridge Community Council (PRCC), and the community we represent, to comment on proposed changes to backyard-cottage (or "DADU") development rules contained in the Department of Planning and Development report, "Removing Barriers to Backyard Cottages."

Our response is based on discussions within our organization, as well as an online survey, which we distributed in our neighborhood and beyond. In our survey, we asked respondents to provide their opinions concerning each of the recommendations contained in the DPD report. Possible choices were "strongly support," "mildly support," "neither support nor oppose," "mildly oppose," or "strongly oppose." The survey also provided respondents with the opportunity to comment on the proposals if they wished.

**We received 363 responses to our survey; 269 of those came from ZIP codes 98103, 98107 and 98117--the ZIP codes that include the area that the PRCC represents.** In this letter we cite the survey responses from these three ZIP codes; however, responses from the broader community were largely consistent with those received from our area. We are happy to share the details of our survey with the City. We believe the responses to our survey results demonstrate a need for the City to proceed cautiously and judiciously in implementing any changes.

The attached report details the response to our survey and our recommendations. In summary, we find that the **owner occupancy requirement must be maintained**; the **present minimum lot size must be maintained**; new flexibility requires **contextual evaluations of parking and design elements**; new **design guidelines** must be implemented; three units on single-family lots (e.g., both an “in-law” apartment and a backyard cottage) should only **be permitted in limited numbers in each area**; and no additional density should be permitted unless **enforceable prohibitions against short-term rentals (“Airbnb”)** are in place.

Thank you for the opportunity to comment. We Hope the City will take a thoughtful approach to this issue, and work with neighborhoods to find housing solutions that work for everyone. We would be happy to meet with City representatives to further discuss this issue, and our recommendations.

Sincerely,

Ted Inkley  
Andra Bell  
John Bito  
Jessica Dixon  
Mark Phillips  
Kelly Powers  
Marilyn Smith  
Mike Veitenhans  
Jan Weldin

Committee on Backyard Cottage Development  
Phinney Ridge Community Council

Attachment



## **Phinney Ridge Community Council Response to “Removing Barriers to Backyard Cottages” March 12, 2016**

### **Summary**

The PRCC's response to the potential code changes acknowledges value in making some changes that allow additional cottage development in single-family zones. Our response to individual proposals and the survey results are presented in the sections that follow.

We summarize our positions as follows:

1. The PRCC and our community are strongly opposed to eliminating the owner-occupancy requirement for accessory units, no matter what other changes are made.
2. We also oppose reducing the minimum lot size for backyard-cottage development. Under the present rules fully 60 percent of single-family lots in the City are eligible for cottages, which is ample for any anticipated growth. We are also against raising height limits above one-and-one-half stories, as we believe this would negatively impact adjoining properties.
3. The PRCC does believe that other modifications to rules concerning accessory-dwelling units could be made. As we explain below, however, we believe that the rules applying to development should depend on context, including lot size, parking issues and the like. The City should use backyard-cottage regulations as an opportunity to move away from its “one-size-fits-all” cookie-cutter zoning policies to develop a more nuanced approach toward density—one that will result in more attractive development and increase neighborhood acceptance of zoning changes.
4. Good design is critical. We note that both Portland and Vancouver, B.C., used as examples in the DPD report, have strict design standards for backyard cottages to ensure that they harmonize with the principal dwelling and surrounding neighborhood. Seattle does not have such regulations, and must enact them as part of any zoning changes.

5. Although the DPD report speculates that the proposed zoning changes won't overwhelm neighborhoods, no one can accurately predict what will happen were the changes to be enacted. The City thus should take an incremental approach, so results can be gauged. We also recommend a rule (such as that in Boulder, CO) limiting the number of accessory-dwelling units in a given area, at least initially. It is much easier, and more sensible, to loosen rules as results unfold rather than to radically change the rules and then try to tighten them once the unexpected occurs.
6. If the rationale for encouraging more accessory dwelling units is affordable housing, then there should be enforceable prohibitions against their use as short-term rentals, e.g. "Airbnb's". The idea is to increase housing stock, not create speculative investment opportunities.

## Potential Code Changes

The PRCC responses to the potential code changes set out in the DPD report are as follows:

### 1. Owner-occupancy requirement

First and foremost, the PRCC and our community strongly oppose eliminating the owner-occupancy requirement for those who build accessory dwelling units. We believe that eliminating this requirement would actually *decrease* the affordability of single-family neighborhoods and harm the quality of life in them without accomplishing the City's stated aims.

**Our survey respondents were strongly opposed to eliminating the owner-occupancy rule. About 59 percent were against changing this requirement, while only about 32 percent favored it—by far the highest negative response to any of the potential code changes.**

A number of survey respondents expressed the same concerns felt by the PRCC board: that loosening the rules governing accessory dwelling units while also allowing absentee ownership would drive up the price of single-family houses, encouraging speculative developers and investors to buy existing houses and either tear them down for bigger duplex-type units with backyard cottages, or use the property as an investment because of the increased development capacity. Many respondents also expressed the fear that allowing absentee ownership would decrease the incentive for landlords to maintain their property or ensure that their renters were good neighbors. Fears were also expressed that this change would lead to single-family properties being increasingly used as "Airbnb" type rentals. As one respondent noted:

Eliminating owner-occupancy invites treating properties simply as financial investment opportunities, which fuels speculation and contributes to

runaway housing costs. When owners live on a property, they're personally and socially invested in their community, and tend to better maintain their property and manage their tenants.

To reiterate: Of all the City's proposals, this is the one that we, and the community, most strongly oppose.

## **2. Eliminating off-street parking requirements**

**In our survey, a bare majority of survey respondents (about 51 percent) opposed eliminating the off-street parking requirement, while only about 39 percent supported it.**

We believe that there is not a “one-size-fits-all” answer to the off-street parking requirement, and that the rules should be clear but flexible to take neighborhood context into account. For example, some single-family neighborhoods have large lots, garages and relatively few cars parked at the curbside. Others—including Phinney Ridge—have older homes on small lots, often without any off-street parking. In addition, parking is tighter in those single-family neighborhoods near commercial districts or dense multi-family areas than it is in relatively more isolated neighborhoods.

Thus, we recommend that parking requirements should vary depending upon the area, and number of accessory units on a property. Stricter requirements should be maintained for neighborhoods near commercial areas or “urban villages,” since spillover parking is already a problem. In addition, any property owner who plans to build both an “in-law” apartment and backyard cottage should be required to provide one off-street parking space. Finally, property owners who construct accessory units should not be allowed to decrease the number of off-street parking spaces on their property in the process (a requirement which we understand is contained in Portland's backyard-cottage policies). However, we do not oppose eliminating the requirement for additional off-street parking for homeowners who construct *either* an “in-law” apartment *or* backyard cottage in other areas, where on-street parking is more likely to be adequate.

## **3. Reducing minimum lot size to 3,500 square feet**

The PRCC is opposed to any reduction in the lot size on which backyard cottages may be built, an opinion reflected by a solid majority of those who took our survey. **About 55 percent of survey respondents opposed this change, while only about 31 percent favored it.**

To begin with, we do not see the present 4,000 square-foot minimum as being a hindrance to backyard-cottage development. As the Department of Planning and Development Report (“Removing Barriers to Backyard Cottages”) notes, almost

75,000 of Seattle's single-family lots are eligible for backyard cottages under the present rules. This number is more than sufficient.

Moreover, the 4,000-square-foot-minimum rule serves several purposes. One is to help ensure that cottages do not impinge on neighbors' privacy. Another is the protection of vegetation and green space in the City. This is important for flood prevention, mitigation of pollution from runoff, and reducing global-warming inducing gasses. For example, A U.S. Forest Service-sponsored inventory has estimated that Seattle's trees store about 2 million metric tons of carbon, and sequester about 140,000 additional metric tons of carbon each year. And according to one estimate, half of Seattle's tree canopy exists on single-family lots. As one commentator has observed, to preserve those trees, you must preserve the yards.

#### **4. Allowing both "in-law" apartments and backyard cottages on the same lot**

**A plurality--about 48 percent--of survey respondents opposed allowing both types of accessory dwelling units on the same lot, while about 38 percent of respondents favored this change.**

The PRCC also does not believe in a "one-size-fits-all" answer to this question. Recall that every property-owner in a single-family zone is currently allowed to add an "in-law" apartment; thus there is a large capacity for accessory units in all neighborhoods regardless of backyard-cottage development.

Because of potential neighborhood impacts, we believe that three units (e.g., both an "in-law" apartment and a backyard cottage in addition to the principal dwelling) on single-family lots should only be permitted in limited numbers in each area. The number allowed should depend on context—for example, present housing density, lot size and parking issues. We believe it is best for the City to proceed cautiously with this change, so that its impact can be evaluated.

#### **5. Changing design standards**

##### **a. Removing garage and storage space from maximum floor-area calculation**

**In our survey, about 52 percent of respondents opposed this change, while only about 32 percent favored it.**

Once more, we believe that context is important and a "cookie cutter" approach is not appropriate. If the City were to raise height limits to two stories in addition to excluding garage and storage space from area calculations, it could lead to structures that overwhelm adjacent properties. On the other hand, more modest changes could encourage homeowners to add housing while at the same time alleviating neighborhood parking problems. We believe that the change in square-

footage calculations should be allowed on larger lots only; for example, those over 5,000 square feet.

#### **b. Raising height limits**

The PRCC and our community oppose the height-limit increases proposed in the DPD report (essentially, allowing two-story “cottages” on any 40-foot-wide lot). **About 54 percent of those who responded to our survey opposed this change, while only about 36 percent supported it.**

We believe that two-story structures might exceed reasonable expectations of the size of a “cottage” and would instead (especially if garage and storage areas were excluded from square-footage calculations) become additional, full-size houses. Especially on 40-foot lots, they could overwhelm yards, intrude on neighbors’ privacy and block access to sunlight.

Thus, we believe that height limits for wider lots should be at most one-and-a-half stories, allowing for gabled roofs but not a full-sized second floor. We also believe that design standards should ensure that cottages under no circumstances exceed the height of the principal dwelling unit or adjacent houses, or place neighbors’ lots in shadow. Strict design guidelines, such as those in Portland and Vancouver, would also help maintain compatibility and should be instituted.

#### **c. Changing standards for the location cottage entrances**

**In our survey, about 47 percent of respondents opposed modifying standards for cottage entrances, while about 35 percent favored this change.** Those who opposed this change expressed concerns about privacy and noise.

The DPD report notes that the present standards are designed to help respect privacy, but states that these standards “constrain” cottage design by forcing entrances to be somewhere other than the “optimal location.” The DPD report does not explain how this restriction reduces the number of cottages built or for whom another location might be “optimal.”

As with other proposals made by DPD in its report, we believe there is not a single answer and there should be a way to take context into account. Factors to be considered should include lot size and configuration, and the location of adjacent homes. Emphasis should be placed on protecting neighbors’ privacy.

###

**ADUEIS**

---

**From:** aileen langhans <aileenmargaret@yahoo.com>  
**Sent:** Tuesday, October 31, 2017 9:35 AM  
**To:** ADUEIS  
**Cc:** Aileen Langhans  
**Subject:** Comment Letter from the Langhans family  
**Attachments:** Langhans letter about ADUs.docx

**Dear Scoping Staff for the ADU EIS process:**

The Langhans family of the University District respectfully submits our comment letter regarding the proposed changes to AADU/DADU regulations. (see attachment, please)

On behalf of our family, I wish to thank you for holding two open houses; unfortunately our schedule prevented us from attending. But, we have seriously reviewed as much written material as possible, reflecting on how the implementation of this proposal will impact the neighborhood which we have called 'home' since 1955. We believe that our concerns also reflect those of the many other unique and diversified single-family neighborhoods throughout Seattle.

We appreciate the City's outreach process, including opportunities yet to come during the entire EIS process. And we thank you, in advance, for your serious consideration and contemplation of our specific comments.

Sincerely,

Aileen M. Langhans

PS. On a less serious note: Hope your Halloween Day is filled with "good witches"

5215 19<sup>th</sup> Ave NE  
Seattle, Washington 98105  
October 30, 2017

TO: ADUEIS@Seattle.gov

RE: Comment letter on the AADU/DADU, during the EIS scoping process

Dear ADU Scoping Staff:

**The Langhans family would like to officially and vigorously support the comment letter submitted by the University Park\* Community Club (UPCC). In addition, we would like to provide the following input:**

1. A recent study has shown a connection between dense urban living and compromised sleep health. Has the City of Seattle reflected on these negative impacts as it promotes serious increases in density within urban centers? Here is an excerpt from a study by sleep health specialist Professor Lauren Hale of Stony Brook University School of Medicine:

***“Studies show that short (<6.5 hours) and long (>8.5 hours) sleepers have higher health risks than mid-range sleepers. Living in a large city is associated with an increased risk of short sleeping of approximately 24%” compared to non-urban areas.... Controlling for demographic characteristics (e.g., age, race, education, occupation, marital status), health behaviors (e.g., exercise level, years of smoking, fat in diet), prior health conditions (e.g., body mass index, leg pain, and history of heart disease, hypertension, cancer, diabetes, stroke, bronchitis, emphysema, and kidney disease) and medication use, sleeping either a long or short amount increases the relative risk of all-cause mortality by up to 40 percent.”***

**Conclusions:**

***The results are consistent with the hypothesis that unhealthy sleep patterns among... large city residents may contribute to health differentials. This information can assist public health and health care professionals in identifying segments of the population that are at higher risk for sleep disorders or potential sleep-related disorders.... This research may guide social scientists to incorporate sleep and other biological variables into future analyses. And finally, it may build additional awareness of the importance of sleep hygiene to the non-sleep research community.”***

2. Several other changes, including reduced minimum lot sizes, maximum lot coverage, and locations for entrances, can lead to an increased risk of fire spreading from home to home and possibly getting out of control; this would also decrease any viable option for escape. These changes will definitely reduce the natural habitat for our non-human residents. Additionally, it can lead to concerns for privacy and respect. To promote and protect a vibrant, secure, and safe community, city and property owners must enforce certain standards of behavior, and combat negative impacts from garbage, noise, and other nuisances. If the city doesn't require owner occupancy, or at least a manager on site, such behavior must be controlled by stricter and enforceable regulations.
3. ***“The objective of this action is to remove regulatory barriers to ADU production, increase the number of ADUs constructed in Seattle, and allow flexibility for larger ADUs that could accommodate changing household needs and families with children. These policy changes would affect development in Seattle’s single-family zones.”*** Regardless of the city's desire to eliminate owner occupancy, the only examples provided to us have involved owner occupancy situations, specifically within the quote above, during previous HALA and MHA open house events, and within this recent email response we received from Office of Planning and Community Development (OPCD): ***“Allowing more ADUs can also benefit homeowners who could benefit from a source of rental income.”*** This is further proof that the city continually fails to recognize the negative impacts already caused by aggressive absentee landlords. We hereby request, once again, that the city provides at least one specific example proving its theory that allowing these absentee landlords and speculators to create ADUs and DADUs will directly produce a significant increase in various sized dwelling units within single-family neighborhoods; the city must also continue to protect each

neighborhood's unique identity and foster a true sense of community. **The Langhans family proposes the following amendment: requiring an on-site manager in place of the owner occupancy rule, one that would be responsible for the behavior of the tenants, the maintenance of the units and property, and adherence to the RRIO regulations. Unfortunately, given that the city currently turns a blind eye to the illegal subdivisions within rental houses, we believe that these property owners will continue to engage in this method of increasing the number of units rather than applying for legal DADUs or AADUs.**

4. Responses to other statements within the recent OPCD email response to our family:
  - a. ***“[Many landlords who in fact live in Seattle, often in the same neighborhood as their rental property] ... take excellent care of their rental house and would be interested in creating housing for more people by adding an ADU, but current rules prohibit it.”***  
This comment is just a deflection. We already have good relationships with most homeowners in our neighborhoods who also own rental units. They have proven to be responsible and dedicated to creating a true sense of community. While recognizing them is valid and appropriate, it is incomplete, if the city fails to also acknowledge the aggressive, out-of-town speculators whose only motive is profit. Not only do they cut up their houses with little regard to the safety and health of their tenants, permit requirements, code compliance, and legal registration under RRIO, they feel no obligation to be “good neighbors” to the adjacent homeowners. Because of their deep pockets, they are able to outbid families who would like to move into our neighborhood – a trend that will only increase should the city’s AADU/DADU regulations be expanded. Why? – they know they will easily recuperate those costs. These speculators, passively encouraged by the city to invade our neighborhoods, are simply biding their time until city code and zoning are changed to make it profitable to construct multi-family projects, ones that would decimate our unique family neighborhoods and eliminating their historic contributions. **Question: Does the city view its proposed regulations as the first step in totally eliminating its single-family neighborhoods by opening the floodgates to wealthy developers?**
  - b. ***“Yes, the proposed code changes would apply to all single-family zones. If there are rooming houses or nonconforming structures like the duplexes I mentioned, the code changes would apply because those structures are in single-family zones — but in general our current policy that these structures cannot increase their nonconformity by expanding or adding even more units would continue to apply.”*** This may seem reassuring to our neighborhood, until we realize that the city doesn’t have a reliable track record for limiting the number of adults per property. How can Seattle guarantee that it will enforce its policy against expanding the number of units, if it doesn’t even have an accurate count of the number of units currently in existence, not even through the RRIO process? There is no clear definition of a “dwelling unit”; and many rental properties in our neighborhood are illegally registered with RRIO as single-family houses, in spite of having eight or even more individually locked units with subleases. City officials must prove that it has the legal authority, appropriate staffing, and determination to control and stifle illegal proliferation of dwelling units under current law FIRST, before asking us to support any dilution of ADU/DADU regulations. **Question: What will prevent the city from deviating from this “current policy”?**
  - c. ***“The Code Compliance division of the Seattle Department of Construction and Inspections is responsible for investigating complaints about possible violations and for enforcement if an investigation finds there has been a violation.”*** The complaint department is not very effective or responsive, nor does it share its findings with the RRIO department, no matter how deleterious the violations are to renters’ safety and health. Apparently, the declaration that Seattle is “one city, one department”, as stated by Kathy Nyland of the Department of Neighborhoods, is just a ‘bumper sticker’ to pacify its citizens!
  - d. ***“Renters comprise more than half of Seattle’s population. Renters are particularly vulnerable to the impacts of rising housing costs. Housing costs have been increasing largely because we have lots of competition for a limited number of homes.”*** This comment exemplifies the city’s denial of how its proposed changes will continue to encourage the aggressive invasion of speculators – a destructive factor which prevents ordinary, middle-class families from purchasing affordable homes in our neighborhood. Instead, city officials want to promote the false conclusion that the rapid increase in property values is caused by the owner-occupied homeowners themselves. **A perfect example of the city’s denial is a single-family property now on the market for \$2.3 million. In spite of city and county records, it was drastically remodeled in 2015: 4 bedrooms have turned into 8; 1 ½ baths have turned**

**into 5 ¾ bathrooms; and an unfinished basement has been remodeled to include a large 2<sup>nd</sup> kitchen and 2<sup>nd</sup> master bedroom. Yet the city permit department has valued these changes at a mere \$20,000 and the new rooms are not being documented or taxed by the county. (Doesn't the 2<sup>nd</sup> kitchen require an application for ADU status, along with owner occupancy?) So much for affordable housing options!**

5. **“Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.”** This statement from the city’s proposal is most disturbing. Why is the AADU/DADU policy exempt from the stringent affordable housing demands outlined in the MHA? Weren’t the MHA regulations a product of HALA – the grand solution to the disappearing affordable housing stock throughout the city? **Question: If the HALA report recommended the ADU/DADU regulation changes, shouldn’t those changes be congruent with the absolute goals of HALA?**
6. The city’s refusal to acknowledge the true density and inventory of rental units creates a false baseline, against which it will then inaccurately measure any future gains and record any successes resulting from the new ADU/DADU regulations. This is tantamount to writing a victory speech before crossing the finish line. Instead, the city must build into its legislation numerous layers of precise, quantifiable, and meaningful standards and benchmarks, in order to monitor and adjust the program based on honest feedback during the implementation process. Unfortunately, the city can offer no reassurance, given its history of declaring victory upon passing legislation into law, before success can be achieved and proven to be the result of that new law.
7. Before Seattle rushes to adopt this city-wide solution to all the evils of single-family neighborhoods, perhaps it should acknowledge the current hidden density that exists in University Park and other similar neighborhoods. The City of Seattle must stop pitting groups against each other through false statements, declaring all single-family neighborhoods to be low-density communities dominated by those families that can afford their expensive homes. The fact is, hidden behind the front entrances of the houses which grace our neighborhood’s streetscape is a diverse density of dwelling units, if only Seattle would see beyond their visible facades. If the city really wants to protect our renters, those dwelling units should not only be counted, but registered and inspected.

**If** the city insists that our affordable housing stock is held hostage by homeowners, many of them empty nesters; **if** the city believes that our neighborhood doesn’t pull its weight in providing affordable housing for its rental population; and **if** the city demands that everyone be able to adapt to life in multi-family units; ... this strategy may further its “revolutionary cause”, but it does so at the expense of alienating the very people from whom the city seeks support. It also ignores and even dismisses the numerous homeowners and neighborhood organizations who love their city and work hard, in many quiet ways, to improve the quality of life for every Seattleite. For instance, the UPCC endorsed and advanced the city’s RRIO legislation from the very start.

We now await the city’s sincere acknowledgement of our issues, respectful consideration of our concerns, and honest effort to address any potentially adverse effects its proposals may have on the many unique single-family neighborhoods which make Seattle a truly special place to live, work, grow old, worship, and play (and a destination to be enjoyed by so many tourists and other visitors)!

Please rise to this serious challenge, as your final decision will have lasting impacts, far beyond your service to City Government. If the City cannot justify its litany of changes by offering concrete, realistic expectations and honest assessments of the practical application of these changes, then perhaps it should go back to the drawing board, and find solutions that won’t tear apart the very fabric of our neighborhoods, as warned in the City’s own DEIS document on its MHA policy.

Sincerely,

Aileen M. Langhans, for the Langhans Family  
U district residents since 1955  
206-522-0203; [aileenmargaret@yahoo.com](mailto:aileenmargaret@yahoo.com)

**PS. It is truly a tragedy to realize that this opportunity to comment on the potentially adverse impacts of the proposed ADU/DADU regulations was only provided by Seattle after an appeal process led the hearing examiner to require the city to do so. SO SAD!**

**ADUEIS**

---

**From:** David Moehring <dmoehring@consultant.com>  
**Sent:** Tuesday, October 31, 2017 10:55 AM  
**To:** ADUEIS; Pennucci, Aly  
**Cc:** Mary Montgomery  
**Subject:** Magnolia Community Council - Statement on Proposed Land Use Code  
**Attachments:** MCC City re ProposedLandUseCode 10302017.pdf

Dear Aly, and Seattle staff

Please record the attached letter from the Magnolia Community Council relative to the proposed ADU-EIS Scoping.

Thank you,

David Moehring AIA NCARB  
 Land Use Committee member of the Magnolia Community Council

---

**From:** Mary Montgomery  
**Sent:** Monday, October 30, 2017 5:11 PM  
**To:** 'lisa.herbold@seattle.gov' <lisa.herbold@seattle.gov>; 'bruce.harrell@seattle.gov' <bruce.harrell@seattle.gov>; 'kshama.sawant@seattle.gov' <kshama.sawant@seattle.gov>; 'rob.johnson@seattle.gov' <rob.johnson@seattle.gov>; 'debora.juarez@seattle.gov' <debora.juarez@seattle.gov>; 'mike.obrien@seattle.gov' <mike.obrien@seattle.gov>; 'sally.bagshaw@seattle.gov' <sally.bagshaw@seattle.gov>; 'tim.burgess@seattle.gov' <tim.burgess@seattle.gov>; 'lorena.gonzalez@seattle.gov' <lorena.gonzalez@seattle.gov>; 'k.harristalley@seattle.gov' <k.harristalley@seattle.gov>; 'kathy.nyland@seattle.gov' <kathy.nyland@seattle.gov>; 'samuel.assefa@seattle.gov' <samuel.assefa@seattle.gov>; 'nick.welch@seattle.gov' <nick.welch@seattle.gov>; 'geoffrey.wentlandt@seattle.gov' <geoffrey.wentlandt@seattle.gov>  
**Cc:** Mary Montgomery <mmontgomery@KellerRohrbach.com>  
**Subject:** Magnolia Community Council - Statement on Proposed Land Use Code

I am currently serving as the President of the Magnolia Community Council ("MCC"). Please note this email message, and its attached correspondence, is being sent to you solely in my capacity as the MCC President and is not related to Keller Rohrbach L.L.P. in any way. Thank you.

Regards,

Mary Montgomery

President, Magnolia Community Council

\*\*\*\*\*

Mary K. Montgomery  
Senior Paralegal - Complex Litigation

Keller Rohrback L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, Washington 98101-3052

Direct Dial No. 206-442-1567  
Telephone: 206-623-1900  
Facsimile: 206-623-3384

Website: [www.krcomplexlit.com](http://www.krcomplexlit.com)

**CONFIDENTIALITY NOTE:** This e-mail message contains information belonging to the law firm of Keller Rohrback L.L.P., which may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual or entity named above. If you think that you have received this message in error, please e-mail the sender. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.



# Magnolia Community Council

MAGNOLIA'S COMMUNITY COUNCIL

October 30, 2017

## VIA EMAIL

### OFFICERS

#### PRESIDENT

Mary Montgomery

#### VICE PRESIDENT

Lynn Hogan

#### TREASURER

Mary Hoverson

#### RECORDING SECRETARY

Aubrey Mandus

#### COMMUNICATIONS OFFICER

#### TRUSTEES

Carol Burton  
Ben Broesamle  
Bruce Carter  
Steve DeForest  
Jessica Galtegos  
Christopher Kirk  
Michele Marchi  
Richard Placentini  
Cindy Pierce  
Michael Plunkett  
Bill Stafford  
Libby Stevenson  
Tom Tanner  
Janis Traven  
Rex Wardlaw  
Thomas Ysasi

Tim Burgess, Mayor – City of Seattle  
Bruce Harrell, President - Seattle City Council  
Mike O'Brien, Seattle City Council  
Sally Bagshaw, Seattle City Council  
Lorena Gonzales, Seattle City Council  
Lisa Herbold, Seattle City Council  
Rob Johnson, Seattle City Council  
Debra Juarez, Seattle City Council  
Kashama Sawant, Seattle City Council  
Kirsten Harris-Talley, Seattle City Council

Sam Assefa Director - Office of Planning and Development  
Nick Welch, Senior Planner Office of Planning and Development  
Geoff Wentlandt, Planner - Office of Planning and Development

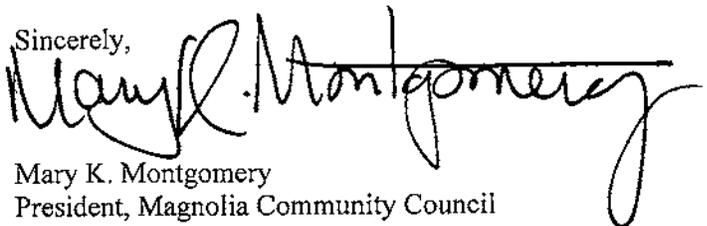
Kathy Nyland, Director - Department of Neighborhoods

Re: Magnolia Community Council Resubmission of Statement on Proposed Land Use Code

Dear Mr. Mayor, Councilmembers and Others,

The Magnolia Community Council resubmits its letter of June 28, 2016 with respect to the City of Seattle Scope of Environmental Impact Statement ("EIS") concerning proposed changes to the Land Use Code. As mentioned in that letter, the Magnolia Community Council continues to encourage the City of Seattle to retain its current policies on Accessory Dwelling Units ("ADU's") and Detached Accessory Dwelling Units ("DADU's" oftentimes called backyard cottages). Those policies were established by the Planning Commission and the Seattle neighborhoods working together and should be retained.

Thank you.

Sincerely,  
  
Mary K. Montgomery  
President, Magnolia Community Council

Attachment



# Magnolia Community Council

---

June 28, 2016

## OFFICERS

Co-Presidents  
Bruce Carter  
Tom Tanner

Vice President  
Janis Traven

Treasurer  
Mary Hoverson

Recording Secretary  
Richard Piacentini

Past President  
Carol Burton

## TRUSTEES

Ben Broesamie  
Steve DeForest  
Lynn Hogan  
Michele Marchi  
Mary Montgomery  
Michael Plunkett  
Bill Stafford  
Heather Ussey  
Rex Wardlaw  
Tom Yaasi

Mayor Edward Murray, City of Seattle  
Bruce Harrell, President - Seattle City Council  
Mike O'Brien, Seattle City Council  
Sally Bagshaw, Seattle City Council  
Tim Burgess, Seattle City Council  
Lorena Gonzales, Seattle City Council  
Lisa Herbold, Seattle City Council  
Rob Johnson, Seattle City Council  
Debra Juarez, Seattle City Council  
Kashama Sawant, Seattle City Council  
Susan McLain, Interim Director - Office of Planning and Development  
Nick Welch, Senior Planner Office of Planning and Development  
Geoff Wentlandt, Planner - Office of Planning and Development  
Kathy Nyland, Director - Department of Neighborhoods  
Jessica Brand, Department of Neighborhoods, HALA Outreach  
Scott Kubly, Director, Seattle Department of Transportation

Re: Statement in Opposition to Proposed Revisions of Seattle Backyard Cottage  
and Attached Dwelling Unit Regulations

Mayor Murray, Council President Harrell, et al:

The Magnolia Community Council joins with the Queen Anne Community Council and the City Neighborhood Council in encouraging the City of Seattle to retain current policies on Backyard Cottages and Accessory Dwelling Units that require homeowner residency of either the principal or accessory dwelling unit, on-site parking requirements, allow a single family lot to have either an ADU or DADU, and retain all existing height, setback, square footage and minimum lot size standards. The current regulations were developed by the Planning Commission in cooperation with Seattle's neighborhoods. Loosening the current standard essentially up-zones single-family neighborhoods by allowing a form of multi-family units into existing neighborhoods without the protective spatial and privacy requirements adjacent neighbors now enjoy.

The Magnolia Community Council has previously supported the HALA recommendation of Mandatory Inclusionary Zoning along with the necessary up-zoning of multi-family and Neighborhood Commercial zoning within the

Magnolia  
Community  
Council  
P.O. Box 99564  
Seattle, WA  
98139-0564

Magnolia community in order to encourage and support more mixed income affordable housing in close proximity to busy bus lines and retail amenities. We also support existing regulations regarding Accessory Dwelling Units, both attached ("ADU") and detached ("DADU"), which are currently being constructed in our neighborhoods.

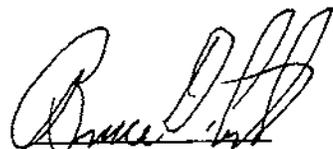
Magnolia is a peninsula served by three arterials connecting across the BNSF railroad tracks to 15th West: Emerson, Dravus and the Magnolia Bridge. A major problem confronting Magnolia is the likelihood of collapse of the Magnolia Bridge during the inevitable next major earthquake. Prior closures of the Magnolia Bridge have generated claustrophobic congestion across Dravus and Emerson, with substantial economic loss to the small businesses in the Magnolia Village. Increased density from numerous backyard cottages would enhance the stifling congestion that will follow a bridge collapse.

Our community continues to urge Sound Transit that the proposed ST3 ballot proposal be amended to provide a light rail station at 20th Avenue West on the Magnolia side of the BNSF tracks to provide direct passenger transportation access to the rest of Seattle regardless of the condition of the three vehicle bridges. The ballot proposal offering a drawbridge to Ballard and an elevated light rail guideway on Elliott Avenue/15th Avenue West in 19 years (2035) is unacceptable to many Magnolia residents.

Before taking action on this proposal to allow multi-family development in single family neighborhoods, the Council should carefully assess which populations would be served by new backyard cottages. What populations are benefitted under existing rules? Would economics suggest that these more costly backyard units would be rented as AirBNB rental units rather than as the limited income rentals that are so scarce in Seattle? Wouldn't limited income renters be better served in multi-family development in close proximity to frequent bus service and retail amenities?

Thank you,

  
Tom Tanner *30e*  
Co-President  
Magnolia Community Council

  
Bruce Carter  
Co-President  
Magnolia Community Council

  
Michael Plunkett *B.D.R.*  
Land Use  
Committee Chair

**ADUEIS**

---

**From:** Joseph Wolf <josephwolf1@gmail.com>  
**Sent:** Tuesday, October 31, 2017 4:20 PM  
**To:** ADUEIS  
**Subject:** ADU EIS Scoping Comments  
**Attachments:** ADU-EIS-Scoping-Handout.pdf

Please see attached. I live in Madrona; we desperately need a more diverse and MUCH more affordable housing stock in this lovely part of Seattle.

Sincerely,

Joe Wolf  
3402 E. Marion Street  
Seattle, WA 98122



# Seattle

The City of Seattle is proposing to change regulations in the Land Use Code to remove barriers to the creation of accessory dwelling units (ADU) in single-family zones. The proposal involves allowing two ADUs on one lot, removing the existing off-street parking and owner-occupancy requirements, and changing some development standards that regulate the size and location of detached ADUs.

We are preparing an Environmental Impact Statement (EIS) that will analyze two alternatives and identify the impacts of each alternative. We want your feedback on what to consider and analyze as we explore small-scale housing options in Seattle's neighborhoods. Complete this comment form at the October 17 or October 26 public meetings or submit your comments by **5:00 p.m. on November 1, 2017**:

**by email to**

ADUEIS@seattle.gov

**online at**

seattle.gov/council/ADU-EIS

**in writing to**

City of Seattle  
Council Central Staff  
PO Box 34025  
Seattle, WA 98124-4025  
Attn: Aly Pennucci

**Are there additional topics or concerns that you would like to see addressed in this EIS?**

The minimum action necessary: Allow more Accessory Dwelling Units in areas with Single Family Zon

---



---



---



---

**Do you have other comments or suggestions related to the scope of the EIS?**

1) Change zoning category name from "Single Family" to "Residential". Seattle's areas zoned "Single Family" supported development of many duplexes, apartments, and vintage "mixed-use" structures prior to downzoning; neighborhoods containing these typologies are among the most desirable in the city. Renaming the zone takes away a mental and emotional roadblock about what this zoning type is for: People.

2) Follow Portland's lead and waive building fees for five years for AADUs and DADUs.

3) Upgrading and fully "legalizing" non-conforming housing types built before 1995.

**name** \_\_\_\_\_ Joe Wolf

**email** \_\_\_\_\_ josephwolf1@gmail.com

**ADUEB**

---

**From:** Ann Prezyna <houseboata@gmail.com>  
**Sent:** Wednesday, November 01, 2017 7:51 AM  
**To:** Pennucci, Aly; Freeman, Ketil; Burgess, Tim; O'Brien, Mike; Johnson, Rob; Herbold, Lisa; Gonzalez, Lorena; Bagshaw, Sally  
**Cc:** Kaplan, Martin; Eastlake Community Council  
**Subject:** Queen Anne Community Council single-family rezone  
**Attachments:** Letter in Support of Queen Anne Community Council request.pdf

Good morning,

I am submitting the attached letter in support of the request for an extension and revision of the EIS scoping comment period for the proposed single family rezone in Queen Anne. Thanks for your consideration.

Sincerely,

Ann E. Prezyna  
President  
Eastlake Community Council



November 1, 2017

Dear Ladies and Gentlemen:

We are writing in support of the October 25, 2017, request by the Queen Anne Community Council for additional public input to the EIS process for the city wide single family rezone proposal. Although Eastlake has no single family zoning and will not be commenting on the EIS, the Eastlake Community Council has long been committed to strong and fair implementation of the State Environmental Policy Act and of the City's SEPA ordinance.

We agree with the Queen Anne Community Council that the City has offered insufficient number, location, length and timing of public comment opportunities in this case. The City's planning decisions impact quality of life in a significant way and these decisions may not be the right ones if the City does not make full use of public input.

For these reasons, we respectfully request that you grant the Queen Anne Community Council's request to cure this deficiency in the public comment process.

Sincerely

Ann E. Prezyna  
President  
Eastlake Community Council

---

**ADUEIS**

---

**From:** nchambers7@comcast.net  
**Sent:** Wednesday, November 01, 2017 8:58 PM  
**To:** ADUEIS  
**Subject:** ADU-EIS Neighborhood #4 – EIS concerns  
**Attachments:** 1909 N 35th.jpg

And the double townhouse in the back of 1909 N. 35th (identical to the double, behind 1905 N. 35th)  
 Backyards non-existent & bracketed by two double townhouses. No sunlight to speak of... Not the way you want ADUs to present.

---

**From:** nchambers7@comcast.net  
**To:** adueis@seattle.gov  
**Sent:** Wednesday, November 1, 2017 8:38:19 PM  
**Subject:** ADU-EIS Neighborhood #4 – EIS concerns

**Introduction:**

We currently live at 3501 Meridian Ave. N. in the single-family zoning side of the street & across the street from our old home at

1905 N. 35th St., (red house in pix attached) in the multi-family zone, which from 1987 onward, was increasingly encroached upon, such that the backyard became very dark & all shade & shadows.

We moved across the street in 1991, to dodge the constant darkness & continuous shade created by high-density condos & townhouse,

but have watched those 3 small bungalows become totally surrounded & dwarfed by the townhouses in their backyards (literally) as well. It's just like the movie, 2009 movie, UP!!

Please see pictures attached.

1) Are there additional topics or concerns that you would like to see addressed in this EIS?

A) Please Ensure solar & daylight setbacks for ADUs!! And garden setbacks, or areas for family recreation somewhere in the yard outside the homes.

I urge you to take a look at the houses: 1901, 1905 & 1909 N. 35th (two blocks north of GasWorks)... as a cautionary tale on how to proceed with ADUs.

There were originally 3 small single-family homes & a large Dutch Colonial home & orchard at 3420 N. Burke immediately behind our 1905 N. 35th St. home, when we bought in 1883 or '84. The Dutch Colonial & its ample piece of land, was the first casualty, where there are now 120+ condos.

These 3 remaining "single-family" homes which now have "ADUs" in their backyards, have been entirely engulfed. Very little daylight, & relatively no garden space or recreational space for residents.

<https://www.google.com/maps/place/1905+N+35th+St,+Seattle,+WA+98103/@47.6480318,-122.3388028,17z/data=!3m1!4b1!4m5!3m4!1sDz549014fda085c85Dz0e775b7d5803c7888m253d47.64803184d-122.3347741>

<https://www.google.com/maps/place/1909+N+35th+St,+Seattle,+WA+98103/@47.6480426,-122.3387873,17z/data=!3m1!4b1!4m5!3m4!1sDz549014fda02303c3Dz84ac55e5d820300z0m253d47.6480384d-122.3346088>

We are happy to share the air with the double row of townhomes (20 in all) on the west side of 3400 block of Meridian Ave. N—a good repurposing of that property.

\*\*\* High density when appropriately allowing for daylight/solar setbacks & garden space, work!!!!

However, the backyards of 1901, 1905 & 1909 N. 35th have been sadly overbuilt with 2 & 3 townhouses each, & utterly surrounded, such that there is no real solar or daylight setbacks.

They are dark little holes behind 1905 & 1909 in particular with southern & western exposures entirely cut off, & where it would be difficult to have a garden for edibles, should they need one.

2) Do you have other comments or suggestions to the scope of the EIS?

Significant evidence of underground spring/stream in lower Wallingford neighborhood! South of 40th at least..

Wallingford's underground spring which sends standing water to basements in lower Wallingford, specifically homes:

- 1) on the north side of the 1900 block of N. 35th &
- 2) the 3500 block of Meridian N.

Because the stream was paved over & intersected by house foundations, the spring bleeds through the hill to the basements of any homes in its way.

Most of the homes on the north side of N. 35th & up Meridian Ave. N. for several houses, have sump pumps & french drains to try to abate the profusion of water coming through.

You can often see water draining out driveway edges most of the way up the 3500 block of Meridian on the west side of the street.

It seems possible, even likely, that the more the underground stream/spring is intersected by foundations, the more unstable the land will become during heavy rains.

Please address this in the EIS.

Sincere regards,  
Jeannine Chambers  
3501 Meridian Ave. N.  
Seattle 98103



## ADUEIS

---

**From:** Pinto de Bader, Sandra  
**Sent:** Thursday, November 02, 2017 10:41 AM  
**To:** Pennucci, Aly; ADUEIS  
**Subject:** Urban Forestry Commission comments on ADU  
**Attachments:** ADOPTED\_DADU\_letter\_110916final.pdf

Hi All,

The Urban Forestry Commission issued a letter of recommendation addressed to CM O'Brien on November 9, 2016 on the ADU/DADU process (enclosed). The Commission voted today to re-send the original letter (enclosed) as part of public comment for the EIS scoping process.

Thank you,



**Sandra Pinto de Bader**  
Urban Forestry Policy Advisor  
City of Seattle, [Office of Sustainability & Environment](#)  
206.684.3194 | [Sandra.Pinto.de.Bader@seattle.gov](mailto:Sandra.Pinto.de.Bader@seattle.gov)  
[Facebook](#) | [Twitter](#) | [Blog](#)

# Seattle Urban Forestry Commission

Tom Early, Chair • Steve Zemke, Vice-Chair

Weston Brinkley • Leif Fixen • Reid Haefer • Donna Kostka • Richard Martin • Joanna Nelson de Flores  
Erik Rundell • Andrew Zellers

November 9, 2016

Councilmember Mike O'Brien  
Seattle City Hall  
600 4<sup>th</sup> Avenue  
Seattle, WA 98124

RE: Backyard cottages and Accessory Dwelling Units

Dear Councilmember O'Brien,

The Office of Planning and Community Development briefed the Urban Forestry Commission about the proposed changes to the zoning code to remove barriers to the construction of backyard cottages and accessory dwelling units (ADUs) at our September 14 meeting. Based on this briefing, we have a couple comments and suggestions for the City Council regarding the legislation.

The proposed change to remove the off-street parking requirement should help reduce impervious surface and provide more flexibility in maintaining and increasing trees and greenery when backyard cottages or ADUs are built. Maintaining this provision in the final proposal will be important in reducing potential trade-off between providing more housing and maintaining the city's tree canopy.

However, even with reduced impervious surface requirements, in some instances existing trees will be cut down to make room for a new backyard cottage or ADU. The current draft proposal does not provide any way to mitigate the loss of these trees. The Commission would like to see the proposed changes include mitigation for trees that are removed due to the construction of a backyard cottage or ADU. Policy options could include requiring replanting a tree of similar potential size and type on the property or mitigation payments to fund planting trees elsewhere if trees cannot be planted on site.

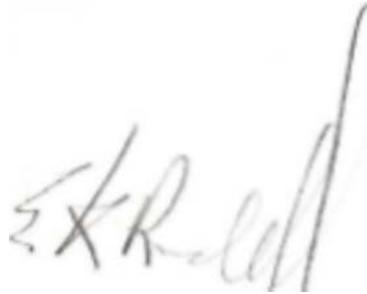
Seattle's Urban Forest represents a vital part of the city's green infrastructure that provides numerous benefits for all residents. The Urban Forest Stewardship Plan has a goal to achieve 30 percent tree canopy cover by 2037. It's important to note that Single Family residential areas have the most tree canopy in Seattle. Ensuring opportunities for new affordable housing while maintaining and growing the city's tree canopy, will be

important for Seattle to meet its housing, social equity, and environmental sustainability goals. Balancing these goals will enhance the overall quality of life for all residents.

Thank you,



Tom Early, Chair



Erik Rundell

cc: Mayor Edward B. Murray, Council President Harrell, Councilmember Bagshaw, Councilmember Burgess, Councilmember Gonzalez, Councilmember Herbold, Councilmember Johnson, Councilmember Juarez, Councilmember Sawant, Jessica Finn Coven, Nathan Torgelson, Michelle Caulfield, Nicolas Welch, Dionne Foster, Aaron Blumenthal, Eric McConaghy.

Sandra Pinto de Bader, Urban Forestry Commission Coordinator  
City of Seattle, Office of Sustainability & Environment  
PO Box 94729 Seattle, WA 98124-4729 Tel: 206-684-3194 Fax: 206-684-3013  
[www.seattle.gov/UrbanForestryCommission](http://www.seattle.gov/UrbanForestryCommission)

**ADU EIS**

---

From: Dan Bertolet [mailto:dan@sightline.org]

Sent: Wednesday, November 08, 2017 12:00 PM

To: Herbold, Lisa <Lisa.Herbold@seattle.gov>; newell.aldrich@seattle.gov; Clardy, Alex <Alex.Clardy@seattle.gov>; andra.kranzler@seattle.gov; Harrell, Bruce <Bruce.Harrell@seattle.gov>; Tang, Vinh <Vinh.Tang@seattle.gov>; Samuels, Jennifer <Jennifer.Samuels@seattle.gov>; Racca, Jeremy <Jeremy.Racca@seattle.gov>; Sawant, Kshama <Kshama.Sawant@seattle.gov>; Virdone, Ted <Ted.Virdone@seattle.gov>; Ziemkowski, Adam <Adam.Ziemkowski@seattle.gov>; Peterson, Benjamin <Benjamin.Peterson@seattle.gov>; Liebermann, Rebekah <Rebekah.Liebermann@seattle.gov>; Johnson, Rob <Rob.Johnson@seattle.gov>; Gore, Amy <Amy.Gore@seattle.gov>; emilio.garza@seattle.gov; Morris, Geri <Geri.Morris@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Swift, BrynDel <BrynDel.Swift@seattle.gov>; Elizalde, Mercedes <Mercedes.Elizalde@seattle.gov>; Emsky, Tyler <Tyler.Emsky@seattle.gov>; Bolieu, Sabrina <Sabrina.Bolieu@seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Marwaha, Jasmine <Jasmine.Marwaha@seattle.gov>; sara.tekela@seattle.gov; Rawlins, Jesse <Jesse.Rawlins@seattle.gov>; Levy, Susie <Susie.Levy@seattle.gov>; Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; lily.rehmann@seattle.gov; Bleck, Alberta <Alberta.Bleck@seattle.gov>; McLuan, Alyson <Alyson.McLuan@seattle.gov>; Burgess, Tim <Tim.Burgess@Seattle.gov>; nate.vanduzer@seattle.gov; Day, Seferiana <Seferiana.Day2@seattle.gov>; Lundberg, Debi <Debi.Lundberg2@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>; orlando.cano@seattle.gov; cori.simmons@seattle.gov; Thomas, Brianna <Brianna.Thomas@seattle.gov>; genevieve.jones@seattle.gov; Freeman, Ketil <Ketil.Freeman@seattle.gov>

Cc: Feldstein, Robert <Robert.Feldstein@seattle.gov>; Assefa, Samuel <Samuel.Assefa@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; Maxana, Sara <Sara.Maxana@seattle.gov>

Subject: Comment Letter on ADU EIS Scoping

Dear Councilmembers and Staff,

Please find attached a comment letter from the Sightline Institute on scoping for the Environmental Impact Statement on proposed rules changes for Accessory Dwelling Units.

Thank you for your consideration.

Dan Bertolet | Senior Researcher

Sightline Institute | 1402 Third Avenue, Suite 500 | Seattle, WA 98101

[www.sightline.org](http://www.sightline.org) | T 206.447.1880

Take advantage of our [news service](#), and find us on [Facebook](#) and [Twitter](#).

Sightline Institute is a think tank providing leading original analysis of energy, economic, and environmental policy in the Pacific Northwest.



November 8, 2017

RE: Accessory Dwelling Units EIS Scoping

Dear Councilmembers:

I am writing to provide Sightline's comments on scoping for the Environmental Impact Statement (EIS) on proposed changes to rules governing accessory dwelling units (ADUs). In general, we support the scoping as described for Alternative 2. However, to achieve a more accurate assessment of the potential impacts on affordability and displacement, we believe that the city must expand the analysis to more closely study effects on the citywide housing market, as explained below.

One of the most contentious issues regarding homebuilding is the concern that affordability may suffer when older, cheaper homes are demolished and replaced with new housing that's more expensive. Case in point, the hearing examiner ruled to require the EIS in question in part because, "the evidence here shows that the legislation would adversely affect housing and cause displacement of populations."

As I noted in an [April 20, 2017 Sightline article](#), that evidence was paper thin:

"The hearing examiner's conclusion... relies on one witness' opinion that the proposed liberalization would push the teardown economics across a tipping point, an opinion that cannot be supported by on-the-ground data because there is none."

Worse, the hearing examiner's ruling ignores impacts at the citywide scale. Paraphrasing my article:

"Economic displacement (caused by rising rents) is displacing far more, probably at least ten times more, people in Seattle than is physical displacement (caused by demolition of existing low-cost housing). In the (likely rare) cases when an existing home is replaced by a new house with an ADU, the net effect citywide is less displacement, because creating more homes addresses the primary cause of rising rents: not enough homes for all the people who want to live in Seattle.

"The teardown of a low-value house might cause the physical displacement of that house's tenants. But preserving that existing house and forgoing a new ADU (or two) will only speed the increase of rents in cheap houses by exacerbating the housing shortage that is driving up prices across the board. There is no escaping the fact that every home not added to Seattle's housing stock leads to one fewer low-income family that can live in the city. The people who are indirectly displaced when construction of new homes is prevented are every bit as harmed as the people displaced by teardowns."

[This short animation](#) illustrates the above housing market and displacement dynamics. Furthermore, if one ignores these dynamics, then one can just as easily speciously claim that not only ADU liberalization, but *any* rezone that raises allowed housing density will cause displacement. Paraphrasing again:

“If teardowns for the sake of ADU construction are a threat to affordability, the same is true for any other form of homebuilding. When there’s demand for housing, any change of laws that allows larger buildings will accelerate redevelopment. And the homes that get replaced first will be the cheap, worn-out, neglected ones—the ones with the lowest rents. But that’s not all there is to the story, because when redevelopment yields a larger number of homes, it eases competition. The pressure pushing up rents is relieved, from the top of the market all the way to the bottom. Thus, as tempting as it may be to impose restrictions in the hope of saving low-cost homes, doing so only makes things worse for affordability overall.”

In other words, if the city can’t defend the liberalization of ADU rules against claims that it causes displacement of marginalized populations, then it can’t defend *any* proposed upzone for the same reasons.

To accurately reveal net impacts on displacement, we request that the city broaden its scope to include analysis at the neighborhood and citywide scales that fully accounts for the market-wide effects of increased supply on prices, rents, and *economic* displacement under the conditions of a housing shortage. The city’s analysis must answer this fundamental question: What is the net effect of increasing the supply of ADUs on rents, prices, and displacement on average throughout the city?

The city recently conducted related analyses in EISs for the U District rezone and the citywide MHA rezones, both indicating that changing rules to allow more homebuilding reduces displacement. These findings likewise suggest that the net impact of the proposed ADU legislation would be less displacement, not more. The city can reference and build upon these prior studies for the ADU analysis.

Regarding the potential impacts on marginalized communities specifically, the city’s EIS analysis for citywide MHA shows a greater rate of single-family home demolitions for redevelopment in higher cost neighborhoods. These data suggest that single-family teardowns for replacement with a new house and ADU would also be more prevalent in expensive neighborhoods than in the lower-cost neighborhoods that typically have higher populations of people of color (POC). The city should compare the real estate development economics in high- versus low-rent areas of the city to assess the potential rate of single-family teardowns in communities of color. The city should also analyze how, conversely, under the No Action Alternative, fewer ADUs could accelerate rent increases of existing housing and result in greater economic displacement of POC, compared to Alternative 2.

To more fully understand the impacts liberalized ADU rules may have on POC, the city should also expand the analysis to explore the widest possible range of effects. For example, could a greater number of ADU rentals help stabilize communities of color by providing lower cost housing options in the single-family neighborhoods of southeast Seattle? Could they also provide better access for POC to the more segregated, high opportunity neighborhoods prevalent in the northern parts of the city? Could the option of adding an ADU help African Americans hold on to their single-family homes by supplementing their incomes? There are likely other factors to consider. The important question the city must answer is: all told, could the No Action alternative actually result in greater net adverse impacts on POC?

We also request that the city focus additional analysis specifically on the owner occupancy requirement. What impact would it have on the rate of ADU production? Since it would preclude the possibility of ADU construction in the one in five single-family houses in Seattle that are currently rentals, how many ADU units would be sacrificed just for that reason? Would it make banks more wary of financing the construction of ADUs? If analysis shows that an owner occupancy requirement would reduce ADU production, the city must assess the effects of the *loss* of the new ADU homes on affordability and displacement--that is, could an owner occupancy requirement intended to reduce displacement actually have the net opposite effect?

Lastly, we believe that the city should expand the ADU EIS scope to analyze related zoning changes that would allow duplex, triplex, and small apartments in single-family zones citywide, as proposed in the 2015 HALA report. These rule changes raise concerns about demolitions and displacement that are similar to those raised by the proposed ADU legislation in question here. So it would be relatively straightforward to expand the analysis on ADUs to cover additional small-scale building types.

Thank you for the opportunity to provide comments on the ADU EIS scoping.

Sincerely,



Dan Bertolet  
Senior Researcher



## NOT IN YOUR BACKYARD: COTTAGES, IN-LAW APARTMENTS, AND THE PREDATORY DELAY OF HALA'S ADU RULES

Abuse of a 1971 environmental law is displacing hundreds of low-income families from Seattle this year.



Author: **Dan Bertolet**

(@danbertolet) on April 20, 2017 at 9:30 am

When it comes to urban homes, it's hard to imagine anything less threatening than **granny flats**. But surprisingly, in Seattle last year instill fear they did, provoking a handful of anti-housing activists to **appeal proposed rule changes** intended to spark construction of in-law apartments and backyard cottages. And in an exasperating turn of events, the appeal was upheld.

Of all the 65 recommendations in Seattle's **Housing Affordability and Livability Agenda** (HALA) plan, these homes—collectively known as **accessory dwelling units** (ADUs) in urban planner-speak—should have been one of the easiest wins. Tucked away on single-family lots, ADUs expand access to great neighborhoods for families who can't afford a pricey, larger detached house. At the same time, they let more people live near jobs and services, shortening carbon pollution-spewing commutes and reining in sprawl.

Still, in many cities throughout Cascadia and the United States, **the road to legalizing ADUs has been long**. In Seattle's case, that road **hit a wall** made of outdated thinking on urban development encoded in state laws that, ironically, were enacted to protect the environment. Because of the appeal, the city must now go back and conduct an exhaustive environmental review that is unlikely to substantially change the proposed ADU reforms. All it will do is squander time, postponing the fixes by about two years to **mid-2018**.

And every year of delay is a lost opportunity to create hundreds of new homes for people who do, or who want to, call this city home, all because a tiny minority of residents don't want their neighbors to offer small rentals in their basements and backyards. It's a phenomenon reminiscent of what writer Alex Steffen calls "**predatory delay**," in which the fossil fuel industry has stalled action on climate change for its own benefit.

There are consolation prizes available to Seattle from this damaging setback, and I'll get to them. But first, I'll review the policies that can unlock ADU homebuilding, then tell the disheartening story of the appeal of Seattle's proposed ADU rule changes, and finally, lay out the flaws in the obsolete regulations that led to all the trouble.

## What's holding back Seattle's ADUs?

In a previous article I surveyed ADUs in Cascadia's three biggest cities, finding that **Vancouver trounces both Seattle and Portland** in the ADU race. As of a year ago, a third of Vancouver's single-family houses had a permitted in-law apartment or backyard cottage, compared to only about one percent of the houses in both Seattle and Portland. Vancouver reigns supreme mostly because officials simply ceased banning ADUs. They:

- 1) stopped mandating an off-street parking spot for each ADU;
- 2) did not require the owner to live on-site;
- 3) allowed both an in-law apartment (constructed within the main house) and a separate backyard cottage on each lot; and
- 4) provided great latitude on size, height, and placement of ADUs.

Consequently, Vancouverites have been adding roughly **1,000 ADUs per year** to their single-family neighborhoods and now have some 27,000 total. Portland got it right on three of these four rules. The exception is that the Rose City still limits ADUs to one per lot. But still, it has seen the number of **ADU homes ramp up** considerably, as shown in the chart below. The city issued about 600 permits in 2016, and by this year's end it will have an estimated 1,900 completed ADUs citywide, an increase of about 300 per year since 2015.

***In 2016, a year when developers opened nearly 6,000 new apartments in the city, Seattle added only 156 ADUs, up from 116 the year before.***

In contrast, Seattle's **current regulations** fail on all four counts. As a result, despite high and rising rents (and soaring home equity that owners could borrow against to finance ADU construction), recent ADU production lags well behind both Vancouver and Portland. In 2016, a year when developers opened nearly **6,000 new apartments** in the city, Seattle added **only 156 ADUs**, up from 116 the year before.

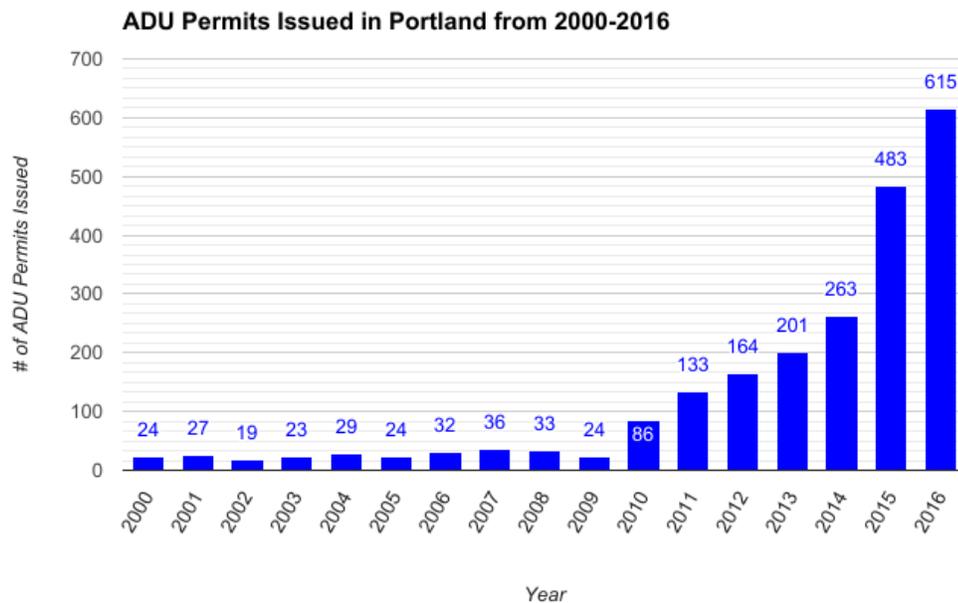


Chart created by [accessorydwellingstrategies.com](http://accessorydwellingstrategies.com) based on data collected by the Portland Bureau of Planning and Sustainability. Note that not all permitted ADUs are built, and some ADUs are built without a permit.

## The ADU-blocking appeal

In May 2016, ten months after HALA recommended the four rule changes above, Seattle leaders released an [ADU plan](#) to implement those recommendations, with a few caveats. The city asserted that the proposed changes did not require completion of an Environmental Impact Statement (EIS) under the Washington State Environmental Policy Act (SEPA), because it would cause no appreciable harm to the environment—called a “determination of non-significance” (DNS).

A month later, the Community Council of Seattle’s affluent Queen Anne neighborhood [appealed the DNS](#). The case went to city hearing examiner Sue Tanner, who in December [sided with the Community Council](#). The city now must conduct a full-blown EIS, a process that typically takes at least a year and costs several hundred thousand dollars in city staff time and fees to consultants.

Tanner ruled that the city’s DNS was flawed for several reasons, some of which were procedural. Here, I’ll focus on the more pertinent and meatier allegations: that the DNS did not sufficiently analyze potential impacts on existing housing and displacement, parking, and public services.

## The ADU opponents have it backwards on displacement

[The ruling states](#): “The evidence here shows that the legislation would adversely affect housing and cause displacement of populations.” The evidence in question was provided by an economist who testified that allowing both an in-law apartment and a backyard cottage would attract “outside investors” enticed by the prospect of renting three units on a single lot, who would buy older cheaper houses, demolish them, and replace each with a new house and two ADUs. An urban planning consultant added that because investors would pick off the cheapest houses first, the proposed rule changes would cause displacement of lower-income “minority populations,” accelerating gentrification and diminishing the city’s diversity.

In response to previously voiced concerns about this “outside investor” scenario, Seattle’s proposal included a requirement that the owner live on-site for a period of one year after ADU construction was completed. **City planners wrote** that the rule would “ensure that speculative development interests are not able to develop single-family lots with ADUs and backyard cottages.” It turns out, though, as noted in **the appeal**, that there’s a workaround: an off-site owner could create a Limited Liability Corporation (LLC) and grant a tenant a tiny fraction of ownership.

The hearing examiner’s conclusion that the proposed ADU changes would increase displacement hinges on an assumption that this LLC workaround would be prevalent. The ruling also relies on one witness’ opinion that the proposed liberalization would push the teardown economics across a tipping point, an opinion that cannot be supported by on-the-ground data because there is none. No such sordid tales of **ADU speculators run amok** have yet to emerge from Vancouver, though home values are even higher there than in Seattle. Nevertheless, the appeal’s de-facto community leader Marty Kaplan hyperventilates that “**there would be a feeding frenzy** for anybody with a truck and a nail bag to go buy homes and convert them into three rental units and displace the population.”

In the majority of cases in-law apartments and backyard cottages are **added to existing homes**. But for the sake of argument, assuming that some amount of teardowns through speculative redevelopment would occur, even under those circumstances, is the ruling’s contention about displacement correct?

Short answer: no. That’s because the hearing examiner—like the plaintiffs’ expert witnesses—got it backwards: building more ADUs is not a cause of displacement; it’s a cure. As I detailed in a previous article, *economic* displacement (caused by rising rents) is **displacing far more, probably at least ten times more, people** in Seattle than is *physical* displacement (caused by demolition of existing low-cost housing). In the (likely rare) cases when an existing home is replaced by a new house with an ADU, the net effect citywide is less displacement, because creating more homes addresses the primary cause of rising rents: not enough homes for all the people who want to live in Seattle.

## Sacrificing ADUs to stop teardowns won’t help

The teardown of a low-value house might cause the physical displacement of that house’s tenants. (It also might not: the previous residents may be the owners, or the teardown may be vacant because it is unfit for habitation. In any case, Seattle’s cheapest houses are already disappearing quickly to make way for exorbitantly expensive new houses built to the maximum size allowed.) But preserving that existing house and forgoing a new ADU (or two) will only speed the increase of rents in cheap houses by exacerbating the housing shortage that is driving up prices across the board. Low-income families will pay more to get the same low-quality housing.

Not only that, when there’s a shortage of homes, the housing market is like a **cruel version of the game of musical chairs**. Those with money always win; those without always lose. Across the city, every ADU that does not materialize is like another a chair taken out of the game, and that translates to a low-income family displaced. Conversely, when one home is transformed into two, even in the worst case scenario where a family gets physically displaced from the original house, those two open “chairs” mean that two low-income families elsewhere in the city will *not* be forced out.

I am not trivializing displacement caused by a teardown. As Seattle grows, city policies and investments can support vulnerable communities so that they can stay in place and benefit from that growth. However, there is no escaping the fact that every home not added to Seattle's housing stock leads to one fewer low-income family that can live in the city. The people who are indirectly displaced when construction of new homes is prevented are every bit as harmed as the people displaced by teardowns.

Worse yet, the hearing examiner's ruling not only has it backwards on ADUs and teardowns but also advances a perilous line of thinking for affordable housing in general. If teardowns for the sake of ADU construction are a threat to affordability, the same is true for any other form of homebuilding. When there's demand for housing, any change of laws that allows larger buildings will accelerate redevelopment. And the homes that get replaced first will be the cheap, worn-out, neglected ones—the ones with the lowest rents.

But that's not all there is to the story, because except for the case of single-family houses, redevelopment invariably yields a **larger number of homes**, easing competition. More players in the game of musical chairs get a seat—that is, a home they can afford in the city. The pressure pushing up rents is relieved, from the top of the market all the way to the bottom. Thus, as tempting as it may be to impose restrictions in the hope of saving low-cost homes, doing so only makes things worse for affordability overall.



Backyard cottage designed by Nest Architecture & Design, located in West Seattle. Photo by Alex Hayden Photography, used with permission.

## Stopping SEPA from doing more harm than good

Adopted in 1971, Washington's [State Environmental Policy Act](#) (SEPA) comes from an era of horror stories about polluted cities that spawned a reflexive inclination to limit urban growth. It calls for an assessment of all the *negative* environmental consequences of major government decisions. Will more ADUs increase a city neighborhood's car trips, crowded street parking, local air pollution emissions, energy consumption, or noise? What SEPA doesn't require, though, is equal consideration of *positive* impacts.

Building more ADUs in Seattle's neighborhoods will:

- modestly **reduce car trips** across the metro area;
- decrease car dependence and increase transit ridership, walking, and cycling;
- slow sprawl and thereby protect forest and farmland from development on the metropolitan periphery;
- improve integration by class** (and therefore likely by race) in neighborhoods that currently exclude middle- and working-class people;
- allow less affluent families to live near the city's best parks, schools, and job opportunities;
- trim consumption of fossil fuels; and
- reduce pollution of water and air—and therefore **climate change**.

These **benefits of compact communities**—of density—are ubiquitous in the past three decades' research on cities. Indeed, the main lesson of that entire body of work is that compact, transit-rich, walkable, mixed-use, mixed-income cities are critical ingredients to a sustainable future. Seattle officials shouldn't have to prove this anymore than they have to prove that hydro- and wind-powered Seattle City Light electricity is better for the planet than the coal power that many rust belt cities rely on. So the fact that a handful of homeowners from an affluent neighborhood successfully used SEPA to stall ADU liberalization is, to understate the case, ironic.

***Compact, transit-rich, walkable, mixed-use, mixed-income cities are critical ingredients to a sustainable future.***

Find this article interesting? **Please consider making a gift to support our work.**

If there is anything of redeeming value buried in the hearing examiner's decision, it is the chance for the City of Seattle to complete an EIS that once and for all lays to rest the ruling's spurious arguments and demonstrates how the net positive benefits of ADUs dwarf the negatives. Ideally, such an EIS could lay the foundation for city rule changes that would exempt infill housing construction from SEPA entirely.

## The most important principle: New housing reduces displacement

First and foremost, the city can address the displacement issue directly to head off future attacks through SEPA against proposals to spur in-city homebuilding. Addressing it directly means establishing the fact that when there's a shortage of housing across a city, adding new homes reduces net displacement, full stop. Even if the new homes are more expensive than the old ones. Because it all comes down to basic math: the bigger the gap between the number of homes and the number of

people who want them, the more the competition for scarce housing floods down the market and pushes people with lower incomes out of the city.

It follows that every time a speculative developer replaces an existing house with a new one that includes an ADU (or two), it's a net win for housing equity. Conversely, every time a teardown is replaced with the largest, most expensive house that will fit on the lot but that can only accommodate one family, it's the worst possible outcome for equitable access to housing. If city officials fail to unequivocally demonstrate these fundamental truths, they will lose the argument from the start.

***When there's a shortage of housing across a city, adding new homes reduces net displacement, full stop.***

## Removing the owner occupancy requirement is key

Seattle's HALA recommended completely removing the owner occupancy requirement because such restrictions hamper ADU production. Also, in 2016 the city conducted **two community meetings** on potential ADU rule changes, and public feedback was nearly 2:1 against owner occupancy rules. As noted above, planners opted for a compromise that mandates one year of owner occupancy. (Incidentally, such rules **may be illegal anyway.**)

Requiring the owner to live on-site removes the **20 percent of Seattle's single-family houses that are rentals** from the pool of possible new ADU sites—sites where adding ADUs to existing rental houses would cause zero physical displacement. Plus, compared to typical homeowners, landlords are more likely to have the financial resources and expertise to invest in new ADUs. For many private homeowners, **financing is the biggest obstacle** to developing an ADU on their own. Risk-taking investors can play a key role in jump starting ADU construction by blazing the trail and establishing the design, construction, and finance infrastructure for ADUs in Seattle that will then make it easier for homeowners to get into the game. Barring non-resident investors from building ADUs will kneecap production, stifling the potential for ADUs to ameliorate Seattle's housing shortage.

Some cities have rationalized owner occupancy requirements as a means to “**preserve neighborhood character,**” based on the perception that rental units may not be well maintained. But if this argument were valid, it would also justify applying the same rule not just to ADUs but to all rental homes, including everything from single-family houses to duplexes, rowhouses, and large apartment buildings. Singling out ADUs is discriminating against renters in the most sought-after residential neighborhoods. In a similar vein, some Seattle officials hope to assuage fears that speculative developers would build “backyard cottages that **don't fit the character of the neighborhood.**” Such arguments prioritize some people's aesthetic tastes over other people's need for housing.

## No one's parking is more important than another person's housing

Regarding parking, yes, removing the off-street requirement for ADUs might increase competition for street parking. A 2014 study in Portland found that on average, **each ADU generates 0.46 cars parked on**

the street. But requiring off-street parking has numerous and hefty adverse impacts. Overall, off-street parking quotas make housing more expensive and deepen car dependence—in direct contradiction to two of Seattle's most urgent aspirations for the future.

Besides, the City of Seattle has no obligation to provide convenient parking, free of charge, on publicly owned streets, to single-family homeowners—the vast majority of whom already have plenty of car-storage space on their own property. In an age of impending climate crisis, in a city where close to half of greenhouse gas pollution comes from cars, it's ludicrous that a policy change as benign as allowing more ADUs can be contested through the State Environmental Policy Act over parking.

## Urban infill such as ADUs makes infrastructure more efficient

The SEPA appeal ruling also cited lack of analysis of public infrastructure, but most of these concerns are based on an outdated context. First of all, as an article I will publish soon details, in most of Seattle's single-family areas, population density has decreased over the past few decades with the decline in average household size. In other words, in the not too distant past, existing infrastructure adequately served more people in most neighborhoods where ADUs would be built. The ruling calls out stormwater management in particular, but today's stringent regulations ensure that any new construction will not increase polluted runoff, and in fact, will likely reduce it.

Furthermore, urban infill projects like ADUs typically cost less to serve with infrastructure compared with the alternative scenario of new homes forced out to more sprawling, suburban locations. Here again, the appeal ruling ignores modern reality—in this case, that urban infill housing lowers per-capita public expenditures on infrastructure.



Backyard cottage designed by live-work-play, located in Seattle's Columbia City neighborhood. Photo by Cindy Apple, used with permission.

## Let's stop shooting ourselves in the foot with SEPA

That adding homes to existing cities is a net positive for both people and the planet is an utterly uncontroversial principle of urban planning. One of the gentlest ways to do that is by allowing ADUs into areas otherwise reserved for single-family houses. Yet in Seattle, Washington State's environmental laws

enabled an obstructionist minority to torpedo a policy change that would have unlocked these much-needed, flexible housing options.

The harm of delay is real: based on ADU construction rates in Vancouver and Portland, every year Seattle's ADU rules remain unfixed and impede production, hundreds of families are losing the opportunity to rent in-law apartments or backyard cottages. Instead, they are competing for existing homes, and as the bidding wars cascade down the market, the lowest-income families are being displaced from Seattle. Rents are rising faster for everyone. Seattle's most desirable neighborhoods are remaining as exclusive as ever, off-limits to people of modest means. The delayed densification of the city's most auto-dependent zones is hamstringing its progress beyond carbon.

Who is winning from the EIS delay? Almost no one, save for a few extreme NIMBYs who want to freeze their neighborhoods in amber, or who care more about street parking than welcoming new neighbors.

Who loses? All the city's renters, who in the best case will pay a little more because of the added competition for apartments that the ADU delay is intensifying, and in the worst case may be forced to find somewhere to live in a cheaper location outside Seattle. But most of Seattle's single-family homeowners lose, too: the majority of them support liberalizing ADU rules. ADUs not only fit Cascadians' tolerant, welcoming values and laidback lifestyles, but they increase home values and income potential for homeowners.

Oh, and the planet. The planet loses, too.

For all these reasons, ADUs should have been the easy part of the HALA agenda. There is a potential silver lining, though. Seattle planners now have the opportunity to craft a definitive EIS that lays the groundwork for preventing the **exploitation of SEPA** by small numbers of entitled residents at the expense of everyone else. Priority one for the EIS is to establish the fundamental truth that regulatory changes allowing more homes are a net positive because more homes are a net positive. Optimistically, this path could lead to the exemption of all future infill housing construction from SEPA, expanding on what the city council **recently approved** for small and mid-sized apartment buildings in Seattle's six official "urban centers."

LIKE WHAT YOU'RE READING? GET OUR LATEST HOUSING RESEARCH RIGHT TO YOUR INBOX.

Power our brains! We're a reader-supported nonprofit.

**Please make a gift today to support our work!**

Tagged in: **ADU, Backyard Cottages, HALA, Housing Affordability, Urban Planning, Urbanism, Zoning**

**ADUEIS**

---

**From:** Art Pederson <artpederson@comcast.net>  
**Sent:** Sunday, November 12, 2017 7:30 PM  
**To:** ADUEIS  
**Subject:** ADU EIS Scoping Comment (Attached)  
**Attachments:** ADU-DADU SEPA Scoping Comments copy.docx; ADU-DADU SEPA Scoping Comments.pages

In Apple/Pages and a Word Doc.

AADU/DADU SEPA Scoping Comments  
Art Pederson November 11, 2017

Thank you for the opportunity to comment on this important issue. I also feel that the original SEPA determination on this issue did not adequately analyze possible and real impacts.

Thirteen issues have been chosen for further study. Below are brief comments on each. My comments are based on two principles and a fundamental question:

- 1) AADU's / DADU's are a creative and compatible way to increase the amount of affordable housing in the City and should be encouraged and supported;
- 2) This additional housing type should not significantly impact the quality of the single-family zone living experience or diminish the opportunities for City residents to own a single-family house, if they chose this type of housing.
- 3) Guideline question: What would any proposal's impact be on the preservation and space needs of trees - the urban forest? (Currently we are failing at this.)

Comments:

- 1) Number of ADU's allowed: Keep the current limit of "one ADU unit per lot" except in Urban Villages where one ADU and one DADU should be considered.
- 2) Parking: Base the parking requirement on two factors, not just the current "inside or outside" an urban village proposal, which I assume is based on frequent transit availability. Consider the amount of available parking on city streets when outside an urban village. For example, I live in Broadview where there is more than ample on-street parking available due to most lots having off-street parking, the relatively large lot sizes (compared to Wallingford and Capitol Hill, for example) and the common 60-foot right of way width. On-site parking in these large lot situations sets up a conflict with preserving open space by lessening on-site impacts from additional housing and structures. And more structure or parking footprint on site means less space for trees.  
If the street, which is designed for cars, has parking availability, then use it for their storage as well and preserve this open space.
- 3) Owner Occupancy: Retain this requirement. I am an owner of a single-family structure, of a small multi-family building and a member of RHA (which in contrast to me supports removal of the owner occupancy requirement). From my real estate experience I am very confident in saying that owner occupants treat a property differently from renters simply because they are not in the property for the long term and are not there to do the day to day things that make a place special.  
I keep by rental property in A-1 condition and do landscape and other aesthetic improvements for the sake of my tenants and neighborhood. The majority of tenants are not interested in contributing time to maintain these improvements, and of course, not invested in paying for them, so the improvements and their maintenance are limited by my time and ability to pass costs on to them.  
One of the many beauties of Seattle is the landscaping and aesthetic improvements by owner occupants in SF areas, or small units in multi-family areas. You do not see this with rental structures, either SF or MF, unless the rents will cover this in the form of payment for the improvements, maintenance and time for the owner or management company to manage these improvements. In other words, the aesthetic benefits to the neighborhoods and the City at large are the result of non-paid "sweat equity" from the owner occupant. This will be lost by removing the owner occupancy requirement.  
More important than the aesthetic concern is the reality that removing owner occupancy will

lead to significant increase in investment purchases of these now “mini-multifamily properties” with the outcome of an increased cost of single-family house lots. This will only make home ownership more difficult to achieve for more citizens.

As a long time member of the RHA, I fully disagree with their position on this issue. The RHA represents real estate investors and what is primarily good for investors; that is their job.

They do a good job of helping investors like myself do our job correctly - to be good owners by understanding the laws and processes of the rental housing business. But that is a different interest than increasing home ownership.

4) Minimum Lot Size: 4,000 sf because we need open space around the primary and accessory structures. And room for the urban forest.

5) Maximum Square Footage: Keep it the same with the exception of excluding garages and storage areas from the DADU limit. Open space and lot coverage can be increased by integrating garages and the DADU, but do not do it to the detriment to the size of the dwelling unit.

6) Maximum Height: Allow the 1-3 foot increase.

7) Keep lot coverage as is. Remember the urban forest?

8) Rear Yard Coverage Limit: The 60% option is at odds with keeping open space. This is too coarse grained; not all DADUs are in rear yards, many can be in the principle building area.

9) Location of Entries: It is not the location of entries per se that create an impact but the location of decks and other areas of activity.

10) Roof Features: Allow exceptions, such as dormers. These are a low visual impact way to increase interior usable space.

11) Household Size: Eight unrelated people is A LOT of people as it is. Do not increase this. Differentiate between SF household size and MF household size if greater people density (not unit density) is desired.

12) MHA non-applicability: I support.

13) RRIO: I strongly support rules for housing standards. But don't forget that for every inspection the cost of housing increases due to the work involved. Registration should be an affidavit that the owner knows the rules and consequences and provides to each tenant the rules (as we require now) but also the route to file complaints without any fear of ramifications. What did you determine to be the number of problem units in the City? 4%? That shouldn't drive the need for inspections on all properties and the added costs to rents.

In addition: I agree with other comments about the City having a process to help owner occupants find and receive low cost construction loans to build these units.

Thank you for your consideration.

Art Pederson

Broadview

**ADUEIS**

---

**From:** Martin Henry Kaplan <mhk@martinhenrykaplan.com>  
**Sent:** Monday, November 13, 2017 9:35 AM  
**To:** Pennucci, Aly; Welch, Nicolas; Freeman, Ketil; O'Brien, Mike; Johnson, Rob; Herbold, Lisa; Gonzalez, Lorena; Bagshaw, Sally; ADUEIS  
**Cc:** Jeff Eustis; Monrad Ellen; Don Harper; Margaret Okamoto; Beth Bunnell  
**Subject:** Scoping Comments pertaining to the ADU-EIS  
**Attachments:** QACC LURC Scoping Comments ADU-EIS--.pdf

**Queen Anne Community Council  
Land Use Review Committee  
Planning Committee**



12 November 2017

**Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw**

**Re: Scoping Comments pertaining to the ADU-EIS**

**Dear Aly, Nick, et al:**

**On behalf of the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), we thank you in advance for considering our attached Scoping Comment letter pertaining to the ADU-EIS.**

**Respectfully Submitted,**

**Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair**

Queen Anne Community Council  
Land Use Review Committee  
Planning Committee



12 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

**Hearing Examiner File: W-16-004**

**Associated File Numbers:**

**Department Reference Numbers:**

**Date:** December 13, 2016

**Type:** SEPA, Design Review, Environmentally Critical Areas

**Examiner:** Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

---

**Queen Anne Community Council Land Use Review and Planning Committee  
ADU-EIS Scoping Comments**

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units)  
Plus suggested 3<sup>rd</sup> Alternative to be considered in the EIS

**1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:**

**(Alternative 1) Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

**(Alternative 2) City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** *During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.*

*We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.*

*Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.*

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3) **Queen Anne Adds:** A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) **OR** one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

## 2. **Parking:**

(Alternative 1) **Existing Land Use Code Regulation**

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

(Alternative 2) **City Proposed Change to:** No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) **Queen Anne Adds:** One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. **Owner Occupancy:**

(Alternative 1) **Existing Land Use Code Regulation**

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

(Alternative 2) **City Proposed Change to:** No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave owner occupancy requirement unchanged.

4. **Minimum Lot Size for a DADU:**

(Alternative 1) **Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

(Alternative 2) **City Proposed Change to:** 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot size requirement unchanged.

5. **Maximum square footage:**

(Alternative 1) **Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas  
DADU (Backyard Cottage): 800 sq ft including garage and storage areas

(Alternative 2) **City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas  
DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3) **Queen Anne Adds:** Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 6. **Maximum Height:**

(Alternative 1) **Existing Land Use Code Regulation**  
No change from existing height limits, which vary by lot width and range from 15-23 feet

(Alternative 2) **City Proposed Change to:**  
Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3) **Queen Anne Adds:** Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 7. **Lot Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**  
35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) **City Proposed Change to:**  
No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage requirement unchanged

8. **Rear Yard Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

(Alternative 2) **City Proposed Change to:**

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** *Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

9. **Location of Entries:**

(Alternative 1) **Existing Land Use Code Regulation**

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

(Alternative 2) **City Proposed Change to:**

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.*

(Alternative 3) **Queen Anne Adds:** DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

10. **Roof Features:**

(Alternative 1) **Existing Land Use Code Regulation**

No exceptions for roof features on accessory structures are allowed.

(Alternative 2) **City Proposed Change to:**

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** *The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Roof Features requirement unchanged

#### 11. **Household Size:**

(Alternative 1) **Existing Land Use Code Regulation**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

(Alternative 2) **City Proposed Change to:**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** *The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Household Size requirement unchanged

#### 12. **MHA Requirements:**

(Alternative 1) **Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.*

(Alternative 3) **Queen Anne Adds:** Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

#### 13. **Rental Registration and Inspection Ordinance (RRIO):**

(Alternative 1) **Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.*

(Alternative 3) **Queen Anne Adds:** No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

#### 14. **Issues of Concurrency**

**Concerns:** *The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure **before** said growth occurs. This*

*has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:*

**A. Schools;** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on-ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** b born <apple@royborn.com>  
**Sent:** Monday, November 13, 2017 12:00 PM  
**To:** ADUEIS  
**Subject:** Backyard Cottage proposal  
**Attachments:** QACC LURC Scoping Comments ADU-EIS--.pdf

I am strongly in support of the Queen Anne Community Council's comments regarding Councilmember O'Brien's proposal as attached below. Please consider these comments when making any final decisions.

**Brenna Born**

Queen Anne Community Council  
Land Use Review Committee  
Planning Committee



12 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

**Hearing Examiner File: W-16-004**

**Associated File Numbers:**

**Department Reference Numbers:**

**Date:** December 13, 2016

**Type:** SEPA, Design Review, Environmentally Critical Areas

**Examiner:** Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

---

**Queen Anne Community Council Land Use Review and Planning Committee  
ADU-EIS Scoping Comments**

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3 <sup>rd</sup> Alternative to be considered in the EIS
--

**1. Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:**

*(Alternative 1)* **Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

*(Alternative 2)* **City Proposed Change to:** A Single-family lot can have both AADU and a DADU

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** *During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.*

*We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.*

*Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.*

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3) **Queen Anne Adds:** A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) **OR** one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

## 2. **Parking:**

(Alternative 1) **Existing Land Use Code Regulation**

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

(Alternative 2) **City Proposed Change to:** No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) **Queen Anne Adds:** One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. **Owner Occupancy:**

(Alternative 1) **Existing Land Use Code Regulation**

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

(Alternative 2) **City Proposed Change to:** No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave owner occupancy requirement unchanged.

4. **Minimum Lot Size for a DADU:**

(Alternative 1) **Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

(Alternative 2) **City Proposed Change to:** 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot size requirement unchanged.

5. **Maximum square footage:**

(Alternative 1) **Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas  
DADU (Backyard Cottage): 800 sq ft including garage and storage areas

(Alternative 2) **City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas  
DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3) **Queen Anne Adds:** Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 6. **Maximum Height:**

(Alternative 1) **Existing Land Use Code Regulation**  
No change from existing height limits, which vary by lot width and range from 15-23 feet

(Alternative 2) **City Proposed Change to:**  
Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3) **Queen Anne Adds:** Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 7. **Lot Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**  
35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) **City Proposed Change to:**  
No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage requirement unchanged

8. **Rear Yard Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

(Alternative 2) **City Proposed Change to:**

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** *Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

9. **Location of Entries:**

(Alternative 1) **Existing Land Use Code Regulation**

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

(Alternative 2) **City Proposed Change to:**

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.*

(Alternative 3) **Queen Anne Adds:** DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

10. **Roof Features:**

(Alternative 1) **Existing Land Use Code Regulation**

No exceptions for roof features on accessory structures are allowed.

(Alternative 2) **City Proposed Change to:**

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** *The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Roof Features requirement unchanged

#### 11. **Household Size:**

(Alternative 1) **Existing Land Use Code Regulation**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

(Alternative 2) **City Proposed Change to:**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** *The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Household Size requirement unchanged

#### 12. **MHA Requirements:**

(Alternative 1) **Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.*

(Alternative 3) **Queen Anne Adds:** Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

#### 13. **Rental Registration and Inspection Ordinance (RRIO):**

(Alternative 1) **Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.*

(Alternative 3) **Queen Anne Adds:** No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

#### 14. **Issues of Concurrency**

**Concerns:** *The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure **before** said growth occurs. This*

*has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:*

**A. Schools;** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on-ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** Justin Allegro <allegrojustin@gmail.com>  
**Sent:** Monday, November 13, 2017 9:42 PM  
**To:** ADUEIS  
**Subject:** Comment: Accessory Dwelling Unit EIS  
**Attachments:** Seattle ADU EIS scoping comment\_Allegro.docx

**Please accept the attached Scoping Comment on the ADU EIS, from a single-family homeowner in Upper Queen Anne, in support of the proposal and Alternative 2 specifically.**

**Justin Allegro  
(703) 340-7553**

November 13, 2017

Aly Pennucci  
PO Box 34025  
Seattle, WA 98124-4025

***Re: City of Seattle Accessory Dwelling Unit EIS Scoping Comment***

Dear Ms. Pennucci:

Please accept this scoping comment as a Queen Anne homeowner in support of the City of Seattle's Accessory Dwelling Unit Environmental Impact Statement (ADU EIS) and Alternative 2 specifically.

I live at 2525 9<sup>th</sup> Avenue West in Upper Queen Anne. We own a single-family detached home. It is important for the city to know that there are homeowners in single-family zoned neighborhoods who supports the city's efforts to increase density, add diverse housing supply, increase housing supply and begin to dampen rising housing purchase and rental prices as part of holistic effort to address the missing middle in Seattle housing options.

Therefore, I strongly support Alternative 2. I think the list of alternatives is sufficient but would encourage an effort by the city to add alternatives that would make the EIS less vulnerable to litigation.

I have worked for the past 5 years at a Washington State natural resource agency. In my opinion, as we address our community's needs, our regional environment will be best protected and ultimately enhanced by increased density in already developed locations. Certainly the ADU EIS may create some environmental impacts that will need to be mitigated appropriately, but those negative impacts would in my opinion likely be outpaced by the cumulative environmental benefits of denser housing.

As far as environmental impacts of the alternatives, I would encourage additional analysis of stormwater. The conversion of undeveloped backyard acreage to roofs and development could conceivably contribute to increased stormwater runoff, which is already a significant problem for the Puget Sound. After analyzing the potential increased build-out as a result of this proposal and the stormwater impacts, a potential mitigation opportunity would include offsite investment in ecosystem-friendly stormwater designs/programs promoted by the WA Department of Ecology, either in Seattle or in broader King County.

In closing, as a Queen Anne homeowner, I believe this city needs more diverse housing options and denser housing, as a top city priority for a variety of economic, environmental, and community reasons. I realize, if done correctly, removing barriers to ADUs and DADUs in single-family zoned neighborhoods may put stress on street parking and skyrocketing home values in those neighborhoods. I, for one, am more than willing to accept those trade-offs for the significant community benefits of more missing middle housing options, and indirectly in the longer-term, more affordable housing options in Seattle.

Sincerely,

Justin Allegro  
2525 9<sup>th</sup> Avenue W  
Seattle, WA 98119

**ADUEIS**

---

**From:** BETTY KLINGEBIEL <WANDBK@CENTURYTEL.NET>  
**Sent:** Tuesday, November 14, 2017 8:17 PM  
**To:** ADUEIS  
**Subject:** Seattle Zoning Proposal  
**Attachments:** QACC LURC Scoping Comments ADU-EIS--.pdf

**We strongly support the below proposals from the Queen Anne Community Council.  
Do not destroy our community!**

**Ward and Betty Klingebiel**

Queen Anne Community Council  
Land Use Review Committee  
Planning Committee



12 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

**Hearing Examiner File: W-16-004**

**Associated File Numbers:**

**Department Reference Numbers:**

**Date:** December 13, 2016

**Type:** SEPA, Design Review, Environmentally Critical Areas

**Examiner:** Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

---

**Queen Anne Community Council Land Use Review and Planning Committee  
ADU-EIS Scoping Comments**

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3 <sup>rd</sup> Alternative to be considered in the EIS
--

1. **Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:**

(Alternative 1) **Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

(Alternative 2) **City Proposed Change to: A Single-family lot can have both AADU and a DADU**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** *During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.*

*We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.*

*Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.*

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3) **Queen Anne Adds:** A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) **OR** one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

## 2. **Parking:**

(Alternative 1) **Existing Land Use Code Regulation**

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

(Alternative 2) **City Proposed Change to:** No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) **Queen Anne Adds:** One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. **Owner Occupancy:**

(Alternative 1) **Existing Land Use Code Regulation**

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

(Alternative 2) **City Proposed Change to:** No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave owner occupancy requirement unchanged.

4. **Minimum Lot Size for a DADU:**

(Alternative 1) **Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

(Alternative 2) **City Proposed Change to:** 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot size requirement unchanged.

5. **Maximum square footage:**

(Alternative 1) **Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas  
DADU (Backyard Cottage): 800 sq ft including garage and storage areas

(Alternative 2) **City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas  
DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3) **Queen Anne Adds:** Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 6. **Maximum Height:**

(Alternative 1) **Existing Land Use Code Regulation**  
No change from existing height limits, which vary by lot width and range from 15-23 feet

(Alternative 2) **City Proposed Change to:**  
Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3) **Queen Anne Adds:** Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 7. **Lot Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**  
35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) **City Proposed Change to:**  
No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage requirement unchanged

**8. Rear Yard Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

(Alternative 2) **City Proposed Change to:**

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** *Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

**9. Location of Entries:**

(Alternative 1) **Existing Land Use Code Regulation**

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

(Alternative 2) **City Proposed Change to:**

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.*

(Alternative 3) **Queen Anne Adds:** DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

**10. Roof Features:**

(Alternative 1) **Existing Land Use Code Regulation**

No exceptions for roof features on accessory structures are allowed.

(Alternative 2) **City Proposed Change to:**

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** *The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Roof Features requirement unchanged

#### 11. **Household Size:**

(Alternative 1) **Existing Land Use Code Regulation**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

(Alternative 2) **City Proposed Change to:**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** *The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Household Size requirement unchanged

#### 12. **MHA Requirements:**

(Alternative 1) **Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.*

(Alternative 3) **Queen Anne Adds:** Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

#### 13. **Rental Registration and Inspection Ordinance (RRIO):**

(Alternative 1) **Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.*

(Alternative 3) **Queen Anne Adds:** No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

#### 14. **Issues of Concurrency**

**Concerns:** *The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure **before** said growth occurs. This*

*has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:*

**A. Schools;** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on-ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** astanko <astanko@comcast.net>  
**Sent:** Wednesday, November 15, 2017 7:07 AM  
**To:** ADUEIS  
**Subject:** Scoping Comments for ADU/DADU EIS  
**Attachments:** Seattlescoping\_ADU.docx

Hello,

Please accept my comments for consideration in preparing the EIS for the ADU/DADU proposal. Please add my name to the list of parties of receiving subsequent notifications about the proposal. Thank you.

Cyrilla Cook

November 15, 2017

City Of Seattle  
Central Staff  
PO Box 34025  
Seattle, WA 98124-4025  
Attn: Aly Pennucci

Emailed to [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov).

Dear Ms. Pennucci,

Please consider these comments regarding the scope of the EIS for the city's proposal to modify regulations for ADUs, DADUs, and short plats, and enter my comments in the official record.

I request that the EIS analyze the potential, adverse impacts and mitigation measures associated with the increase in impervious surface that could result under a full buildout scenario of ADU/DADUs/short plats under Alternative 2. Full buildout would be defined as a cumulative impact analysis of the combined impacts of maximum allowed footprints of ADU, DADU, and short plat of every lot that could be developed under the alternative (worst case scenario). The analysis should include comprehensive consideration of how the potential increase in stormwater runoff would adversely impact Puget Sound and stream water quality, stream health for coho spawning, sediment contamination of submerged lands, and stormwater contaminant bioaccumulation in mammals. The analysis should address existing stormwater infrastructure and its capacity to pretreat additional stormwater prior to surface water discharge. The potential loss of pervious surfaces and vegetative cover due to full buildout and its potential impact on surface water quality and stream health should be analyzed, especially given that 65% of the city's green canopy is found on residential lots. See, for example: <https://fortress.wa.gov/ecy/publications/documents/0710058.pdf>. Potential mitigation measures should include increased enforcement of tree protection and replacement of lost trees in all zones. The EIS should also analyze how loss in tree canopy could impact local climate conditions, including local air quality, heat islands, and carbon sequestration.

The EIS should include a comprehensive analysis of the potential impacts associated with the loss of wildlife habitat due to increases in impervious surface and removal of vegetative cover and large trees in neighborhoods under Alternative #2. This should include potential, adverse impacts to local songbird populations and amphibians that rely on remaining vegetation located in residential yards. See, for example: [http://www.sefs.washington.edu/research.acl/Urban\\_Ecology/donnelly\\_marzluff\\_urbecosyst.pdf](http://www.sefs.washington.edu/research.acl/Urban_Ecology/donnelly_marzluff_urbecosyst.pdf).

The EIS should analyze the potential, adverse impacts to neighborhood livability and property values due to loss of views and increased shading under full buildout, including any increased demand for variances granted to increase heights in response to lost views.

The EIS should include a third alternative that is less permissive than Alternative #2 with the goal of allowing additional ADUs while minimizing potential impacts to livability of existing neighborhoods, tree canopy and green space, vegetative cover, wildlife, traffic congestion and parking, and livability. It should prohibit any height increases, and prohibit both an ADU and DADU on the same lot unless 80% of

the ADU is located underneath the primary dwelling. The city should consider mitigating the impacts of additional density in existing neighborhoods by requiring minimum of at least 300 feet of green spaces for each detached ADU.

Thank you for the opportunity to provide scoping comments. Please notify me of any future public comment opportunity or other actions associated with this legislation at [astanko@comcast.net](mailto:astanko@comcast.net).

Sincerely,

Cyrilla Cook  
3208 W. Elmore St.  
Seattle, WA 98199

## ADUEIS

---

**From:** Douglas McKenna <ddouglasmckenna@gmail.com>  
**Sent:** Wednesday, November 15, 2017 9:46 AM  
**To:** ADUEIS  
**Subject:** Fwd: QACC Scoping Comments pertaining to the ADU-EIS  
**Attachments:** QACC LURC Scoping Comments ADU-EIS--.pdf

See attachment with reference to my earlier email message.

Douglas McKenna, Ph.D.  
The Oceanside Institute  
Seattle, WA  
Greenbank, WA

Begin forwarded message:

From: Douglas McKenna <[ddouglasmckenna@gmail.com](mailto:ddouglasmckenna@gmail.com)>  
Date: November 15, 2017 at 09:44:21 PST  
To: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)  
Cc: Alwifesandlover McKenna <[kimberlymckenna@comcast.net](mailto:kimberlymckenna@comcast.net)>, "ddouglasmckenna@gmail.com McKenna" <[ddouglasmckenna@gmail.com](mailto:ddouglasmckenna@gmail.com)>  
Subject: QACC Scoping Comments pertaining to the ADU-EIS

Dear Sirs and Madames,

I have thoroughly reviewed the comments in the attached document from the QACC. I have been a resident of Queen Anne since 1968. I graduated from Queen Anne High School and Seattle Pacific University. My wife and I currently own a single family home on the south slope and a condominium in the Victoria Apartments. This is our home.

I enthusiastically support ALL the proposals and their rationales put forth by the council. The quality and livability of our neighborhood and others across the city is at stake.

Please give due consideration to these comments and follow their guidance as you make decisions on scoping.

Thank you,

D. Douglas McKenna, Ph.D.  
206.335.2809

Douglas McKenna, Ph.D.  
The Oceanside Institute  
Seattle, WA  
Greenbank, WA

Queen Anne Community Council  
Land Use Review Committee  
Planning Committee



12 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

On behalf of my colleagues on the Queen Anne Community Council (QACC) and our QACC Land Use Review and Planning Committee (LURC), please accept this letter as our Scoping Comments delivered as per the extended deadline.

We have composed this letter to represent our comments divided into the 13 proposals you outlined in your 'Comparison of Alternatives'. You have only offered one alternative to the existing code as a top-down one-size-fits-all policy proposal. As it is typical for an EIS to include at least three alternatives for public review, we have added a 3<sup>rd</sup> Alternative for you and your consultants to consider. We have compared the existing policy to your only alternative, offered a commentary, and in addition offered a 3<sup>rd</sup> Alternative as well where appropriate in our opinion.

Our comments directly relate to our past positions regarding Councilmember O'Brien's original proposal that we appealed last year due to a lack of any environmental impact analysis. In prevailing in that appeal, we expect that beyond our comments included below, and the comments from hundreds of others, you and your EIS consultants will consider and address every one of the 17 Conclusions advanced by the Hearing Examiner in her decision referenced below:

**Hearing Examiner File: W-16-004**

**Associated File Numbers:**

**Department Reference Numbers:**

**Date:** December 13, 2016

**Type:** SEPA, Design Review, Environmentally Critical Areas

**Examiner:** Sue A. Tanner

Thank you for your careful attention to our comments along with those of hundreds of other citizens spread throughout our City. The thought of advancing a top-down one-size-fits-all land use change affecting every single-family neighborhood in our city deserves a professional, independent, unbiased, respectful and nuanced approach. As you know, your proposals amount to the largest land use change in the history of Seattle affecting over 300,000 citizens and over 125,000 individual properties and property owners.

We suggest that all analysis within the EIS must take into consideration the unique qualities and character of each Seattle single-family neighborhood, and their unique physical conditions that address each of your 13 Alternatives and the 17 conclusions advanced by the Hearing Examiner referenced above. In addition, we

have added significant city-wide concerns that we feel need to be addressed in the EIS that you have not listed as significant environmental impacts. These appear in item 14 below.

As you have chosen to limit the public discussion to written correspondence only instead of a public hearing, and in accordance with your Scoping Comment deadline of 16 November 2017, please find the following comments reflective of some of our questions concerning the 13 Alternatives to the existing regulations you propose to change. We ask that within the EIS, you independently study with non-partisan independent professionals the environmental impacts resulting from the proposals you have put forward in addition to fully respecting the Hearing Examiner's 17 Conclusions of record.

Thank you for your immediate attention in registering our Scoping Comments,

Queen Anne Community Council  
Land Use Review and Planning Committee  
Martin Henry Kaplan, AIA Chair

---

**Queen Anne Community Council Land Use Review and Planning Committee  
ADU-EIS Scoping Comments**

Existing and Proposed Land Use Code Regulations for ADU's (Accessory Dwelling Units) Plus suggested 3 <sup>rd</sup> Alternative to be considered in the EIS
--

1. **Number of Accessory Dwelling Units (ADU's) allowed on a single-family zoned lot:**

(Alternative 1) **Existing Land Use Code Regulation:**

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment OR one DADU (Backyard Cottage) but not both.

(Alternative 2) **City Proposed Change to:** A Single-family lot can have both AADU and a DADU

A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment AND one DADU (Backyard Cottage)

**Comments:** *During our Seattle Planning Commission comprehensive study between 2005 and 2009 of allowing Backyard Cottages on single family properties, we felt that in order to preserve and respect the character of our neighborhoods like every other city we studied in the U.S., we should limit the number of residences per lot. We felt that if your house was built on a lot over 4,000 sq ft, then adding one small residence of no larger than 800 sq ft (including a garage) OR a Mother-in-Law apartment inside the existing home was reasonable considering all the other code requirements defining single-family properties such as lot coverage and open space, building setbacks and height, tree canopy preservation and drainage, and of course infrastructure and parking capacity as well.*

*We, along with every other city we studied in the U.S., felt strongly that allowing both an AADU and DADU to be built on one lot in addition to a home would forever change the character of the neighborhood and place an undue hardship and burden on the existing engineered infrastructure constructed in accordance with one single home per lot. We seriously considered the impacts of doubling the density and anticipated extraordinary engineering and capacity stresses put upon storm water drainage, sanitary sewer, water, cable, telephone, and electric service among others. Of course, we also considered the anticipated dramatic increases in parking challenges especially on many city streets where existing parking on both sides restricts travel to one lane and existing density already fills these streets with well over 100% capacity.*

*Remember that when the city was platted over 100 years ago and infrastructure was engineered, designed and constructed, the infrastructure was sized considering one family per lot in single family neighborhoods. Nothing has changed, been upgraded, or studied since considering the possibility of doubling or now tripling the density on a single-family lot and neighborhood street. In fact, on Queen Anne, Capitol Hill and other neighborhoods, wooden water supply piping is still used and has not been replaced. As the code currently allows 8 unrelated people to occupy one single family lot, O'Brien's proposal to increase this to 12 significantly stresses the above related infrastructure and without studying these impacts, converting single family homes to boarding houses is currently tearing neighborhoods apart.*

Even though the City has not changed the lot coverage requirements, the proposed addition of one extra unit strongly suggests that lots may be filled to the maximum building envelopes which will dramatically impact height, bulk and scale. We have been seeing this happen throughout the city in ever increasing numbers. In fact, maximum lot coverage of 35% only related to lots over 5,000 square feet and those below 5,000 sq ft are allowed greater coverage based upon a calculation which results in an allowable 46.5% coverage for a 3,200 sq ft lot, as defined in this proposal. So, this proposal allows three homes on one lot as small as 3,200 sq ft allowing 46.5% lot coverage. We strenuously object to filling in our single-family neighborhoods with three homes per lot.

(Alternative 3) **Queen Anne Adds:** A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) **OR** one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 below.

## 2. **Parking:**

(Alternative 1) **Existing Land Use Code Regulation**

One off-street parking space is required for an AADU or DADU unless the lot is in an urban village

(Alternative 2) **City Proposed Change to:** No off-street parking required.

The proposal removes any parking requirements from building one, two, or three homes on one single-family lot. All cars associated with these additional homes must park on the street.

**Comments:** Seattle is a collection of over 30 neighborhoods, each possessing a specific character and level of existing infrastructure. Some newer neighborhoods in West Seattle, Blue Ridge or View Ridge for example have wider streets, newer utilities and larger properties. Some other older neighborhoods like Capitol Hill, Wallingford, or Queen Anne and Ballard have narrower streets, smaller properties, and outdated infrastructure. The existing requirement to provide one parking space per residence on site takes into account the significant challenges to parking near one's residence.

The increase in density within all neighborhoods will only increase these challenges. However, a blanket one-size-fits-all solution of eliminating the parking requirement completely throughout the city absolutely ignores the unique and different challenges spread throughout our city's neighborhoods. In addition, to allow for three residences on one 3,200 sq ft property may likely contribute 6 or more cars to a street when the size of that property clearly would not support more than one car along one side of the street frontage.

During our Appeal Hearing, the City's architectural witness testified that he shared a house with six others and each had a car. In addition, John Shaw, the City's Transportation Planning witness suggested that a reasonable number to assume for car ownership throughout the city was over 1.2 cars per unit.

(Alternative 3) **Queen Anne Adds:** One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths than can accommodate parking on both sides with two lanes of travel in-between.

## 3. **Owner Occupancy:**

(Alternative 1) **Existing Land Use Code Regulation**

The property owner must retain ownership in perpetuity and occupy either the main house or the AADU/DADU. The owner may be away from their residence for no longer than 6 months in a calendar year.

(Alternative 2) **City Proposed Change to:** No ownership requirement

No requirement for an owner to occupy the house, AADU, or DADU.

**Comments:** The Seattle Planning Commission together with other cities studied across the U.S. felt strongly that requiring the owner of a property to remain a resident and occupy the property was critical in preserving the qualities of every neighborhood. Therefore, we required that if a property owner chose to construct a DADU (Backyard Cottage) OR add an AADU (Mother-in-Law) apartment in their home, the property owner had to live full-time in one of the two units and not be able to rent both residences. The owner could be away from their home for no longer than 6 months out of any calendar year.

In this way, developers could not speculate in neighborhoods by buying up homes, converting them to multi-family commercial rental properties and either adding them to their portfolios or selling them with little regard for their

neighbors or neighborhoods. During our appeal, the City's own witnesses agreed that there would be wide speculation and that the lack of ownership requirement would open all neighborhoods up to uncontrolled redevelopment, profiteering and conversion to multi-family neighborhoods.

In addition, the elimination of the ownership requirement would exacerbate displacement and gentrification as the now 'affordable' homes would be the first to be redeveloped into three homes. And these new homes would rent for many multiples above the original home being replaced and contribute further to eliminating, not adding, affordable housing.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave owner occupancy requirement unchanged.

4. **Minimum Lot Size for a DADU:**

(Alternative 1) **Existing Land Use Code Regulation**

In order to qualify to build a DADU on a single-family zoned property, the minimum lot size must be no less than 4,000 sq ft. There are no exceptions.

(Alternative 2) **City Proposed Change to:** 3,200 sq ft minimum

The City proposes to reduce the minimum lot size from 4,000 sq ft to 3,200 sq ft.

**Comments:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive comparison studies concerning minimum lot size around the U.S. in cities that allowed Backyard Cottage, that 5,000 sq ft was minimum. In 2010, the City Council lowered that threshold to 4,000 sq ft in conflict with our research but that minimum lot size has remained in the code. O'Brien proposes to lower the threshold to 3,200 sq ft without one comparable example anywhere in the U.S. based upon the city's own testimony during our appeal. In the City's own studies of 59 other cities in the U.S. that allow for Backyard Cottages, Seattle's 4,000 sq ft minimum is the lowest by far with most other cities averaging about 10,000 sq ft. Considering that most of the properties smaller than 4,000 sq ft and down to 3,200 sq ft are located in the oldest and most dense neighborhoods with the greatest infrastructure, parking, and open space challenges, it is unconscionable to consider the one-size-fits-all approach to lowering the minimum allowable sq ft to below 4,000. Especially considering the lack of 'concurrency' planning, lowering the allowable lot size ignores the impacts of allowing 2-3 residences to be constructed on properties that represent the very smallest of single-family zoned lots.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot size requirement unchanged.

5. **Maximum square footage:**

(Alternative 1) **Existing Land Use Code Regulation**

AADU (Mother-in-Law in house unit): 1,000 sq ft including garage and storage areas  
DADU (Backyard Cottage): 800 sq ft including garage and storage areas

(Alternative 2) **City Proposed Change to:**

AADU (Mother-in-Law in house unit): 1,000 sq ft **excluding** garage and storage areas  
DADU (Backyard Cottage): 1,000 sq ft **excluding** garage and storage areas

**Concerns:** Originally between 2006 and 2009 the Seattle Planning Commission determined through careful and comprehensive research, that adding an AADU (Mother-in-law) apartment inside one's home would be commensurate with respecting the total lot coverage allowed – in other words building such a unit within the home would not materially impact the yards, open space, and privacy within one's neighborhood. In keeping with this formula and again studying examples throughout the U.S., we felt strongly that DADU's/Backyard Cottages should be limited as to not overwhelm a property, negatively impact neighbors by taking away light and air, open-space and trees, and must preserve the qualities of single family neighborhoods with respect to privacy, etc. The idea of limiting DADU's to 800 sq ft including the garage was in direct response to limiting the size of backyard houses which often may overwhelm the backyards, reduce tree canopy and open space and increase impermeable surfaces, increase run-off, and potentially overwhelm utility infrastructure where many neighborhoods currently remain underserved.

This change proposes to increase the allowable size of backyard buildings by over 1,000 sq ft. Backyard Cottages have been defined since 2006 by their limited size and when combined with some garages, the total allowable size of 800 sq ft assumes a small structure in respect for neighbors. The proposed change allows for an unlimited sized garage plus a 1,000 sq ft DADU/home in the backyard; resulting in many cases that these "Backyard Cottages" may be larger than the main house on the property. These would not be DADU's/Backyard Cottages, they would be houses. 300 Backyard Cottages have been built under our current code since 2010 and due to the expense and lot coverage restrictions; they have been mostly respectful of neighbors and neighborhoods. Loosening these restrictions as O'Brien proposes will greatly increase the impacts to neighbors who will see larger "Backyard Homes," and not 'Backyard Cottages' built next door. Again, like all these proposals, O'Brien assumes a one-size-fit-all solution here when in most

cases opening up the size limits would severely impact neighbors while on some lots of much greater size, perhaps some new accommodation might be able to be considered. In addition, during our appeal, evidence was presented that confirmed that over 50% of 300 Backyard Cottages built to date are short-term rentals such as Airbnb and VRBO, and do not add to the city's rental stock nor "affordable housing" in any definition as typical rents exceed \$2,500 for the smallest units.

(Alternative 3) **Queen Anne Adds:** Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. We propose considering allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 6. **Maximum Height:**

(Alternative 1) **Existing Land Use Code Regulation**  
No change from existing height limits, which vary by lot width and range from 15-23 feet

(Alternative 2) **City Proposed Change to:**  
Height limits are 1-3 feet higher than existing limits, depending on lot width

**Concerns:** We on the Seattle Planning Commission felt strongly that the maximum allowable height should be a function of environmental impacts to neighboring properties. The current codes reflect that sense of respect and relate to lot size and setbacks from property lines. We feel strongly that that any proposed increases should directly correspond to lot sizes and should be well above the minimums already set at 4,000 sq ft. When considered alongside other City proposals that allow for reduced lot minimums and increased square footage allowances, we feel that increasing the height and bulk of these buildings would present a significant increase in environmental impacts. In addition, the increase in height proposal will allow for the abuse of maximum sq ft limits as clerestories and other devices have already been proven to convert to living space and bedrooms that exceed code regulations.

(Alternative 3) **Queen Anne Adds:** Again considering O'Brien's one-size-fits-all approach in his proposal, we suggest that there could be opportunities to consider raising maximum building heights in unique situations. As the Seattle Planning Commission forum in 2009 and 2010 along with the City Council, we found a direct connection between lot size, height, and setback in considering environmental impacts. Therefore, as with several Alternative 3 proposals above, we suggest that considering raising maximum heights should be limited to lots greater than 10,000 sq ft, in neighborhoods characterized by large lots and wide streets. We propose considering allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

## 7. **Lot Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**  
35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet

(Alternative 2) **City Proposed Change to:**  
No Change

**Concerns:** Again, we strongly feel that lot size allowance is directly related to the impacts associated with lot coverage. If you compare a neighborhood containing mostly 5,000 sq ft lots, then every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. On the other hand, under O'Brien's proposal and special exceptions, a 3,200 sq ft lot could cover 1,480 sq ft which relates to 46.25%. This huge difference in allowable square feet of coverage will translate into much smaller yards with two houses crammed in the backyard, posing privacy issues while eliminating significant tree canopy and open space. This factor, together with infrastructure and parking challenges provides a very strong argument for not reducing minimum lot size and reduced lot coverage exceptions and allowances.

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage requirement unchanged

8. **Rear Yard Coverage Limit:**

(Alternative 1) **Existing Land Use Code Regulation**

40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage

(Alternative 2) **City Proposed Change to:**

60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story.

**Concerns:** *Again, we strongly feel that lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 50% increase in lot coverage allowances in rear yards will have a dramatic impact upon reducing open space, tree canopy preservation, privacy and bulk development. We strongly believe that the rear yard lot coverage should remain unchanged and just because a property owner decides to build a Backyard Cottage, said property owner should not be granted a special exception over their neighbor who must conform to the existing code. Increasing the lot coverage for one privileged population ignores the rights of everyone else and especially adjacent neighbors and single-family neighborhoods whose rear yard lot coverage is limited to 40% for important considerations like open-space, preservation of tree-canopy, and privacy among others like impermeable surfaces and drainage.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave minimum lot coverage and rear yard requirements unchanged.

9. **Location of Entries:**

(Alternative 1) **Existing Land Use Code Regulation**

DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.

(Alternative 2) **City Proposed Change to:**

DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).

**Concerns:** *The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would suffer the greatest impacts. In considering allowing entries to occur within a side yard setback should be limited to lots of a much greater size, allowing for a 10' minimum setback.*

(Alternative 3) **Queen Anne Adds:** DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Therefore, as with several Alternative 3 proposals above, we suggest that considering revising the entry limitation should be limited to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as defined in No. 2 Alternative 3 above.

10. **Roof Features:**

(Alternative 1) **Existing Land Use Code Regulation**

No exceptions for roof features on accessory structures are allowed.

(Alternative 2) **City Proposed Change to:**

Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the same provisions that govern exceptions for single-family houses.

**Concerns:** *The exceptions O'Brien proposes here can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other devices that in effect add building height and add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom and exceeds allowable square footage limits. We see significant opportunities for common abuse and believe it should remain limited as is.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Roof Features requirement unchanged

#### 11. **Household Size:**

(Alternative 1) **Existing Land Use Code Regulation**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.

(Alternative 2) **City Proposed Change to:**

Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.

**Concerns:** *The current code allows 8 unrelated people to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. We have seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before, even within O'Brien's original legislation that we appealed. The greatest concerns connected with increasing this limit are related to density and privacy concerns, infrastructure capacity, parking, and conversion of single-family neighborhoods. The City's own witness during the hearing testified that he rented a house with 6 friends and they had 6 cars, 5 of which parked on the street. Single family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts infrastructure challenges and significant burdens to neighboring properties.*

(Alternative 3) **Queen Anne Adds:** No Alternative-Leave Household Size requirement unchanged

#### 12. **MHA Requirements:**

(Alternative 1) **Existing Land Use Code Regulation**

Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged. O'Brien and others have discussed converting all single-family zoned property to 'Residential Zones' allowing for multi-family development to occur everywhere on every lot. It is easy to assume that in the event that O'Brien and others in the City forward these significant changes, then he and others may easily associate the MHA up-zones and requirements with every residential property in Seattle converting through a "backdoor" every single-family neighborhood to multi-family zones with much higher densities, lot coverage, height restrictions, and all the up-zones contained within the MHA requirements and development opportunities.*

(Alternative 3) **Queen Anne Adds:** Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

#### 13. **Rental Registration and Inspection Ordinance (RRIO):**

(Alternative 1) **Existing Land Use Code Regulation**

Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.

(Alternative 2) **City Proposed Change to:**

No Change

**Concerns:** *There are no concerns if the definitions of single family zones remain unchanged and all property owners within single-family zone neighborhoods must occupy one of two residences (Main House, AADU or DADU) if multiple residences exist. The current requirement for owner occupancy must remain unchanged from current codes/policy.*

(Alternative 3) **Queen Anne Adds:** No change - Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

#### 14. **Issues of Concurrency**

**Concerns:** *The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. We have witnessed especially in the last 15 years a significant growth in population and building without a commensurate commitment to successfully address issues of concurrency as outlined below. We strongly feel that inviting new growth and density should involve a concurrent investment in infrastructure **before** said growth occurs. This*

*has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. Along with all the concerns expressed above in proposals 1 through 13 including the 17 Conclusions of the Hearing Examiners ruling in our appeal, we feel it is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:*

**A. Schools;** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;

**B. Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?

**C. Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such as Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and on-ramps, and major arterials and freeways as well;

**D. Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

**E. Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;

**F. Public Transportation:** As we know, our city has been increasing service hours, however due to our transit circulation challenges created by topography, accessibility, distance to service and other concerns, we believe that any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

**ADUEIS**

---

**From:** udistrictcouncil@hotmail.com  
**Sent:** Wednesday, November 15, 2017 2:12 PM  
**To:** Pennucci, Aly  
**Cc:** Gonzalez, Lorena; Herbold, Lisa; Johnson, Rob; O'Brien, Mike; udistrictcouncil@hotmail.com  
**Subject:** U-District Community Council comments on ADU EIS  
**Attachments:** U-District Community Council 11.15.17 ADU Comment Letter.doc

**UNIVERSITY DISTRICT COMMUNITY COUNCIL  
C/O 4534 UNIVERSITY WAY NE  
SEATTLE, WA 98105  
(206) 527-0648**

[udistrictcouncil@hotmail.com](mailto:udistrictcouncil@hotmail.com)

November 15, 2017

Aly Pennucci

Legislative Department

P.O. Box 34025

Seattle, WA 98124-4025

Via email to [aly.pennucci@seattle.gov](mailto:aly.pennucci@seattle.gov)

**Comments from the UDCC: Accessory Dwelling Units Environmental Impact Statement**

Dear Ms. Pennucci,

The University District Community Council strongly supports Alternative 1 (No Action) as the best EIS option for the proposed ADU/DADU legislation now before the Seattle City Council. As currently drafted, the City's proposal would fundamentally change SF5000 zoning in a way that creates too many negative impacts on many neighborhoods and is not necessary to meet the City's growth goals, which can already be accommodated in existing multifamily zones.

With every option that has occurred since the so-called "Urban Village" plan of the mid 1990's, the City of Seattle has promised neighborhoods as a quid pro quo for signing off on these plans (and re-electing the politicians who promulgated them) that development would be contained within boundaries outlined in Urban Villages/Centers and/or within the newly designated Transit Center boundaries. We request that you keep those promises and also ask that you protect what is truly unique and valued by the residents of many Seattle neighborhoods - single family homes. This legislation is simply a backdoor attempt to impose duplex and possibly even triplex zoning in these areas, and must be rejected.

This proposed legislation is a 'one size fits all' proposition, and fails to acknowledge the varying conditions in different neighborhoods. Some blocks have alleys and some don't, some houses are one story, distances between lotlines vary, some lots have differing location of exits/entrances, etc. This proposal ignores all of these different conditions in favor of a uniform proposal, and due to the size of these projects they will be exempt from Design Review. Until these issues are addressed the UDCC strongly supports the No-Action Alternative.

The proposed increased height of DADUs, the likely removal of vegetation, the creation of shadows and reduction of privacy, and the elimination of current parking and owner occupancy requirements are all of grave concern to our neighborhood as well as others throughout Seattle. Onsite owner occupancy - especially in urban neighborhoods such as the University District - protects against the longstanding problems created by a few bad landlords who subdivide houses for transient renter populations (often hard-partying students) who are unfortunately occasionally not good neighbors. This proposed legislation does not address any of these negative impacts, and instead offers an empty promise that more "affordable housing" will result through this substantial density increase - even though this increased density will likely to drive the price of existing older units up as they are opened up to speculators and developers who hope to cash in on the de facto uptown.

The City promised affordable housing in our Urban Villages/Centers and Transit Centers. To facilitate this developers were granted twelve and fifteen year Real Estate tax giveaways (MFTE/MHA), the relaxation of bulk and height restrictions, and the substantial gift of not having to provide onsite parking because no one will allegedly need cars in a transit hub or Urban Village (at least one recent study found that a significant number of "Apartment" dwellers apply for and receive Residential Parking Zone permits, for just one example of why this assumption is incorrect). The City has also steadfastly refused to levy the impact fees allowed by law that most other local jurisdictions have used to offset the costs imposed by new growth. The UDCC requests that the City conduct an evaluation of how well these programs are performing before giving a blank check to developers to build out what is left of our SF neighborhoods. Please examine the failure or successes of the MFTE and MHA programs before you continue to breach promises to our neighborhoods of keeping development within our designated urban village boundaries.

The RPZ was presented to our neighborhoods as a way to solve our parking problem, but about the only success of this program has been to serve as yet another revenue source for the City. Since the inception of the RPZ, our neighborhood has seen the removal of back yards in favor of parking lots and continued growth in the number of new multifamily units that are eligible for permits. This proposed ADU/DADU legislation eliminates onsite parking requirements while allowing a 50% increase in the number of unrelated people that can live on one single family lot, which represents a triumph of wishful thinking rather than a responsible plan to deal with the real world impacts of the fact that most Seattle residents still own cars.

It seems that much of the pressure to open up single family neighborhoods to new construction is not based in longstanding Seattle and area growth planning principles, but is instead driven by the desire of developers and speculators to build in these neighborhoods precisely because they are nice places to live. The University District Community Council urges the Seattle City Council to work harder (and expend the necessary resources) to invest in the Urban Villages, Urban Centers, and Transit Centers that have long been at the center of growth planning to ensure that they receive the necessary open space and other amenities that will make them more attractive to families and the upscale population that can afford the new market rate units the City is encouraging there.

Matt Fox,

UDCC President

CC: Councilmember Lorena Gortalez  
Councilmember Lisa Herbold  
Councilmember Rob Johnson  
Councilmember Mike O'Brien

## ADUEIS

---

**From:** Kirsten Smith <kirstens@aiaseattle.org>  
**Sent:** Wednesday, November 15, 2017 2:40 PM  
**To:** ADUEIS  
**Subject:** AIA Seattle comments  
**Attachments:** AIA Seattle ADU-EIS-Scoping-Comments 11.16.17.pdf

Hello,

I've attached the **American Institute of Architects – Seattle** comments on the ADU EIS scope.

Thank you,  
Kirsten Smith

**Kirsten Smith**  
Manager of Advocacy for the Built Environment  
**AIA Seattle + AIA Washington Council**  
**American Institute of Architects**

206.448.4938 x401 office | 206-708-3199 cell  
[kirstens@aiaseattle.org](mailto:kirstens@aiaseattle.org)

**Center for Architecture & Design**  
1010 Western Ave. | Seattle, WA 98104



November 16, 2017

Aly Pennucci  
City of Seattle  
P.O. Box 34025  
Seattle, WA 98124-4025

RE: ADU EIS Scoping Comments

Dear Ms. Pennucci:

**AIA Seattle**

Center for Architecture  
& Design  
1010 Western Ave  
Seattle, WA 98104

T (206) 448 4938

[aiaseattle.org](http://aiaseattle.org)

Thank you for the opportunity to respond to the scope of the EIS related to the city's proposed changes to the Land Use Code on ADUs/DADUs in single-family zones. AIA Seattle's members – around 2,000 architects and professionals working on the design of our city – care passionately about making better buildings and neighborhoods. We offer the following suggestions to ensure that the scope of the EIS thoroughly covers the original needs targeted by the proposed changes.

1. Clearly identify the impacts to housing affordability as a result of each alternative.

This EIS is part of a larger effort related to HALA to increase housing affordability in the city – arguably the biggest crisis Seattle faces today. As a result, the evaluation of any change must focus on whether it increases affordable housing options throughout the city. For example, which alternative will produce more housing close to jobs? Which is more likely to provide more housing options at different price points?

We also believe that the EIS scope should identify and evaluate additional incentives that can produce even more housing, including:

- Waiving building permit fees for five years for ADUs and DADUs, as Portland has done.
- Allowing duplexes or triplexes in some single family zones.
- Assisting homeowners with the high costs of building ADUs and DADUs, such as allowing homeowners to qualify for MHA payments to build additional dwellings

In addition, we would like the EIS to consider whether each alternative might encourage actions that reduce affordable housing alternatives for permanent residents – such as speculative development that raises housing costs or the creation of short-term rental properties that eliminate options for long-term residents.

2. Include environmental impacts that are caused by any of the alternatives.

This EIS does not appear to include the environmental impacts of either alternative. We are particularly interested in understanding how each alternative will impact carbon emissions and help mitigate the impacts of climate change. This year Seattle adopted the goals of the Paris Accord and the city is working on ways to achieve them. As part of this effort, please consider the impacts to carbon emissions from any alternative studied under this proposal. We also encourage you to consider incentives that would facilitate building more green housing. Examples might include size or height bonuses for green buildings or green roofs.

3. Identify additional ownership structures that could positively impact housing affordability.

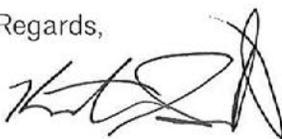
The housing crisis in Seattle is so severe that we need to be creative in identifying ways we can help mitigate it. We encourage the city to consider additional ownership structures that could positively impact housing affordability. Examples might include:

- Allowing homeowners to sell a DADU by dividing their parcel.
- Allowing required side yard setbacks for DADUs to be waived with an agreement between neighbors – similar to what is currently allowed for detached garages. Neighbors could economize their structures by building adjacent DADUs with a shared wall.

Finally, we suggest that definitions used in the descriptions of the alternatives be tightened. Especially helpful would be clear guidance on what is included in height limits or setbacks. For example, are handrails and parapets included in height limits, or are they excluded? Very specific guidance is helpful to our members as they work to create the best possible designs within the city's rules.

Thank you for the opportunity to comment on the scope of the ADU EIS. We are pleased to be part of the HALA process and to support the city's efforts to create a more equitable and sustainable city for all.

Regards,



Kirsten Smith  
Manager of Advocacy for the Built Environment

**ADUEIS**

---

**From:** Ruedi Risler <risler@u.washington.edu>  
**Sent:** Wednesday, November 15, 2017 4:23 PM  
**To:** ADUEIS  
**Subject:** Scoping Comments for ADU / DADU Environmental Impact Statement  
**Attachments:** ADU DADU Scoping Comments by Ruedi Risler.pdf

Thank you for extending the deadline for these comments. Attached you find my contribution.

Ruedi Risler

## Scoping Comments for the Accessory Dwelling Units Environmental Impact Statement

Submitted by Rued Risler, 15-NOV-17

I am a resident of University Park, and our Community Club has already submitted a set of comments. In general, we are opposed to changes to the existing ADU rules, because we already have many duplexes in our neighborhood, some legally non-conforming and some illegal. We therefore have experience with the type of density increases that are now proposed, and unfortunately these are negative. We have no issues with ADUs and DADUs, where the owner lives in one of the units.

Here are my personal remarks:

1. Consider a more diversified approach to ADU/DADU developments, rather than a one size fits all. For instance

- Allowing both an ADU and DADU might make sense for lots over 5000 sf, but not for undersized lots down to 3200 sf.

- In many University towns, the number of students living in one property is limited to fewer than 8, as is presently allowed in Seattle. Consider the impact of unruly students and their parties, when allowing ADUs. Consider overlay districts for areas with a large student population.

- Parking is a problem now in our neighborhood, and this is why we have an RPZ and an overlay requirement that the mandatory parking for ADUs cannot be waived. There may be areas, where this is less of a problem, and area dependent rules may be in order.

2. It is very clear in our neighborhood that owner occupied properties have much fewer problems with noisy parties, garbage management and general livability problems. Compare number of police, SPU and DCI complaints between owner occupied properties and properties owned by absentee landlords. Review data from other jurisdictions to investigate differences in rent costs between owner occupied and developer owned. The owner occupancy rule should not be changed or watered down.

3. As the goal of the proposed change is an increase in density, it has to be accompanied by corresponding infrastructure improvements, such as utilities, transit, sidewalks, roads, parking, open space, services (schools, police, fire, medical, social). Document the necessary investments and how they are going to be financed.

4. Another goal is affordability. Make realistic cost comparisons between ADU/DADU construction and rent levels with units of similar size in differently zoned areas, specifically in urban centers and villages. Show that allowing more ADUs and DADUs really provides affordable units.

5. Whatever new rules are introduced, additional information must be collected. There are too many assumptions being made to argue one way or another. Determine what information would help to assess future changes, and collect targeted information, for instance on rent levels, race and ethnicity of owners and renters, education levels etc. to assess, what impact land use policies, such as this ADU proposal, have on social issues such as equality. Who profits from these changes and who is affected negatively? This data collection could probably be done through a modification of the RRIO reporting rules.

6. On-site parking arrangements. Presently the rule allows 3 vehicles to be parked outside on any lot, however DCI interprets this to mean 6 for duplexes, 9 for triplexes etc. This had led some property owners to concrete over large areas of their property and creating parking lots. Some rent out this space for extra income. Among other scenarios, this has happened with properties where a garage has been turned into an extra unit, or has simply been demolished to create more parking. Investigate the impact of on-site parking on the tree canopy, water runoff etc.

Define the number of parked vehicles allowed outside, and improve enforcement, which is presently lacking.

7. Whatever the proposed changes are, mitigation of adverse effects must be taken seriously. In many cases problems exist already now, and allowing more ADUs and DADUs will exacerbate these. The EIS process typically compares proposed changes to a no action alternative. In previous EIS reports (e.g. the U-District upzone) the conclusion was drawn that as a certain problem already exists, it would only get marginally worse, therefore there was no negative impact, and no

mitigation was needed. This is not a reasonable approach to urban planning, and appropriate improvements, to the infrastructure for instance, should be made whenever rules are changed.

8. Necessary changes to the infrastructure must be properly financed. It is not good enough to say we have no money for infrastructure now, so this will be the same if we increase density, and no infrastructure improvements are necessary. Serious consideration must be given to impact fees. It is not reasonable to keep the cost of ADUs (or any other type of construction) down by dropping contributions to infrastructure. In the end, we either have no infrastructure improvements, or someone else will have to pay for these. It must be clearly spelled out how this is handled.

Ruedi Risler  
5256 19<sup>th</sup> Ave NE  
Seattle, WA 98105

**ADUEIS**

---

**From:** Dale luhman <dale.luhman@gmail.com>  
**Sent:** Wednesday, November 15, 2017 6:51 PM  
**To:** ADUEIS  
**Subject:** scoping comments on adu eis, due 11/16/2017  
**Attachments:** 2017\_11\_15\_accessory dwelling units eis scoping comments.docx

**Please acknowledge that you received my comments. thanks. dale luhman**

**11/15/2017 Scoping Comments on**

**accessory dwelling units EIS, city of Seattle due 11/16/2017**

Email to: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)

Range of alternatives. Currently you propose the existing situation, Alternative 1, for accessory dwelling units (adus); and Alternative 2, removing almost restrictions for attached and detached adus. I think a reasonable range of alternatives should also include an alternative 3 that is MORE restrictive to the existing situation. Many adus have been built in the past few years, but many more could be built under the current very loose requirements, affecting short and long term adu properties, as well as adjacent neighbors and neighborhoods.

In my proposed alternative 3, I would have the standard be –

1. Number of adus allowed on a single family lot. Maximum aadu OR dadu, if there is a compelling reason to allow it that will not unreasonably affect the immediate adjacent and nearby neighbors, as well as the neighborhood.
2. Parking. One off street parking required for an aadu or dadu in single family zoning in and outside of urban village.
3. Owner-occupancy. An owner must occupy main house or aadu or dadu 12 months a year.
4. Minimum lot size. This should be 6,000 square feet to consider only oversized single family residences for possible aadu or dadu.
5. Maximum square footage. 800 square feet including garage and storage areas, for either aadu or dadu.
6. Maximum height. No change from existing height limit. (same as Alternative 1, existing situation)
7. Lot coverage limit. 35% of lot area for lot of any size meeting standard of at least 6,000 square feet.
8. Rear yard coverage limit. 40% of a rear yard can be covered by a dadu. (same as Alternative 1, existing situation)

9. Location of entries. Dadu entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way. (same as Alternative 1, existing situation)
10. Roof features. No exceptions from the height limit are allowed. (same as Alternative 1, existing situation)
11. Household size. Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an aadu or dadu. (same as Alternative 1, existing situation)
12. MHA requirements. Mandatory housing affordability (MHA) does not apply to creation of adus in single-family zones. (same as Alternatives 1 and 2)
13. Rental registration and inspection ordinance. (RRIO) property owners renting one or more units, including in single-family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements. (same as Alternatives 1 and 2)

In addition to your identified elements for the environment for analysis in the EIS.

#### Land use

1. Impact to changes to the character of the neighborhoods, its human scale, density of people and vehicles. A single family home might typically have 2 parents and 2 kids, with 2 cars to go to work and park. 8 unrelated people might all be adults going to work, with maybe 8 cars to park. Alternative 2 says with aadu and/or dadu it can be 12 unrelated people, or potentially 12 adults going to work and parking. Even the existing situation with 8 unrelated people in a single family neighborhood, on a 5,000 square foot lot, 50'x100', with boyfriends, girl friends, spouses, dogs, cats, stepping outside to smoke, leaving for work at different times and talking, slamming car doors, roaring up the street, all is impactful at 8 people, much less 12 people. What kind of quality of life is offered to the impacted neighbors and neighborhood? Not everyone wants to or can just move out if they don't like these impactful changes. They have family, kids, grandkids, jobs, churches, friends, community connections. Impacting existing single family homeowners so more people can be squeezed in to the same number of square feet impacts the living style and character of the existing homeowners for the benefit of speculators and those homeowners who might have wanted to move out anyway. At the expense of those left behind to have even more dense impacts on their homes and neighborhood.
2. The era and types of homes will be impacted in the short and long term. Many neighborhoods have eras they were built, 1910s, 1920s, 1930s, etc. Allowing more dense aadus and dadus can affect density of square footage of structures on lots, open flower and vegetable garden areas, numbers of people on each lot, renters versus homeowners. Potential to be involved with the neighborhood and community. Disruption to the fabric of neighbors and neighborhoods. Existing houses may be torn down to maximize square footage on a lot for living space, building right up to all setbacks and going as high as allowable, while overshadowing and blocking sunlight and views of adjacent neighbors.

#### Housing and socioeconomics

1. Allowing aadu and dadu might allow smaller houses for people to rent or buy. But this can again be at changing the short and long term character of a single family neighborhood. An existing house might have a yard, flower or vegetable

garden – open space in a back or side yard for a less claustrophobic setting for the homeowner and adjacent neighbors. The setting is a less dense single family neighborhood. If aadu and dadu are added, much or all of open setting and space can be filled with structures. If an existing house is torn down and then aadu and dadu are added, almost all of a lot, up to 5 feet or 10 feet back from property lines can be dense housing. This adds nothing to the character of the lot or to neighbors. If people do not want traditional single family lots, maybe they should live in 20 story high apartments in downtown Seattle, instead of a neighborhood with single family lots, like Morgan Junction. If more density is allowed, retired, older people who do not like the changes that are allowed in neighborhoods, or that are actually occurring in their neighborhoods have to just live with it because they cannot afford to move, or do not want to move because of their ties to the community. More dense policy impacts current homeowners who are content, hopefully the ones the city wants to keep content so all of Seattle does not become all dense housing with aadu and dadu, or multistory apartments.

### Aesthetics

1. Consider views from and of surrounding neighbors and terrain. Allowing aadu and dadu buildings only 5 feet back from sides and 10 feet back from rear lot lines allows visual intrusion into adjacent lots. More living room, kitchen, bedroom windows look out closer to adjacent corresponding windows, where people have to shut curtains and shut out light for privacy or be on display to neighbors.
2. More allowed buildings and square footage allows more shading and blocking of views, territorial or other.
3. Established neighborhoods, some from 1910s, 1920s, 1930s, etc. have an expectation of what their neighbor's houses are and what the neighborhood feeling is. Now changing the rules to allow aadu and dadu on smaller lots, affects the zoning contract that was signed when a person bought their house, whether 50 years ago or 5 years ago. Homeowners expected single family houses, families, 1930s houses, not dense non conforming new houses and aadu and dadu additions that do not fit into a neighborhood that has been there for 70 or 80 years.

### Transportation

1. Changing the amount of unrelated people who can live on a single family lot from 8 to 12, potentially changes from 8 to 12 cars that might be impacting street parking. Especially if no off street parking is required. Granted some might use busses, but many may not. By not requiring off street parking for aadus and dadus in already congested neighborhoods, it just makes unpleasant and stressful for the rest of us already living here.
2. Streets and buses are congested already. Metro had a ballot vote a few years ago, if not passed, metro said the number of busses and routes would be eliminated. If all these new dense housing units are added, more streets are not being added, it just makes it more congested for all for now and into the future. If running the busses depends on passing a levy, and a bus levy fails, then people resort to more cars and people park on the already congested streets. Isn't the city supposed to help its current citizen's fix current problems, not make more problems for them?

### Public services and utilities

1. Increases in housing units, increases, people, cars, kids going to schools, people needing fire and police help, need more parks and green space.

2. More potential sewer overflow from more allowed housing square footage on lots, causing less permeable soil, so more rain gutter water runs into combined sewer and rain gutter lines to cause more overflow during heavy rain events. We had to build Lowman Beach combined overflow tank recently so we don't spill sewer into Puget Sound on some of the rainiest days with the existing housing in place. How will this facility, along with the rest of Seattle, respond to rain, when every single family residential lot can add more people to each lot with aadu and dadu, along with Upzoning height and more density in many areas, causing more people on the same streets using more water to wash and flush, as well as having less permeable surface per lot to absorb some of the heavy rains, be expected to handle these increases? Planning and allowing all of the zoning changes, whether aadu or dadu, or Upzoning allowing higher and more dense development on existing lots, without building the infrastructure in *ADVANCE* to be able to handle the sewer overflow events, much less having more fire and police stations in place, more classrooms, more parks and open space to handle the allowed increases, seems like this causes a decrease in the quality of life to existing residents, more pollution from automobile combustion, more people using the same limited parks and open space. If we can barely keep running the infrastructure that we have, roads, bridges, busses, schools, waterlines, gas lines, phone lines, etc. adding more to the mix by drastically allowing more aadu and dadu all over the city might allow more people to live in the city and commute a shorter distance to jobs, but these increases lower the quality of life of people who are already living here. This does not seem like a reasonable balance, especially if all of the above infrastructure is not built to handle the potentially allowed increases in *ADVANCE*. If the city cannot afford to pay for increased infrastructure in advance, increases in density of housing should not be allowed.

Dale Luhman

6681 Beveridge Place SW

Seattle, WA 98136

[dale.luhman@email.com](mailto:dale.luhman@email.com)

## ADUEIS

---

**From:** Emily Miner <eminer@mhseattle.com>  
**Sent:** Thursday, November 16, 2017 8:40 AM  
**To:** ADUEIS  
**Cc:** Ian Morrison; jillmm11@gmail.com  
**Subject:** Comment Letter  
**Attachments:** DADU Comment Letter.pdf

Good Morning,

Please see the attached comment letter for the proposed EIS Scope for the Accessory Dwelling Unit EIS.

Best,

Emily Miner  
Attorney

**[McCULLOUGH HILL LEARY ES](#)**

701 FIFTH AVENUE, SUITE 6600

SEATTLE, WA 98104

TEL: 206.812.8388

DIRECT: 206.812.6950

FAX: 206.812.8389

[eminer@mhseattle.com](mailto:eminer@mhseattle.com)

[www.mhseattle.com](http://www.mhseattle.com)

**NOTICE:** This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

November 16, 2017

VIA Electronic Mail

Office of Planning & Community Development  
c/o Aly Pennucci  
PO Box 34025  
Seattle, WA 98124-4019  
Email: [ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)

Re: Detached Accessory Dwelling Units  
Environmental Impact Statement Scoping Comment

Dear Ms. Pennucci:

On behalf of Jill Malone, we are writing to provide our comments on City of Seattle (“City”) Office of Planning and Community Development’s (“OPCD”) Environmental Impact Statement (“EIS”) Scoping Proposal for the proposed revisions to the City’s Land Use Code (“Code”) to remove barriers to the creation of detached accessory dwelling units (“DADU”). We would like to become official parties of record for the Environmental Impact Statement (“EIS”) for the proposed changes.

Overall, we are pleased with the direction of the EIS Scoping Alternative Two, and believe that increasing density on a neighborhood friendly scale via DADUs will best achieve the City’s ultimate goal of increasing housing opportunities. However, we believe that while Alternative Two trends in the right direction, it does not go far enough to maximize the potential housing opportunities that DADUs could generate.

Currently, Alternative Two limits DADUs to 1,000 square feet, excluding garage and storage areas, restricts the maximum lot coverage for lots 5,000 s.f. or greater to 35% and lots less than 5,000 s.f. to 15%, and limits household sizes to 12 unrelated people if the lot has an DADU.

We are concerned that these restrictions hinder the opportunity for certain lots to take advantage of the potential for DADUs. To that end, the EIS should thoroughly consider:

- Increasing the maximum square footage of the DADUs from 1,000 s.f. to 1,800 s.f. The proposed 1,000 s.f. limit is simply too small for a family. Increasing the maximum square

footage of DADUs to 1,800 s.f. would create much needed family-size housing opportunities.

- Increasing the maximum lot coverage to 45% for lots 5,000 s.f. or greater and 20% for lots 5,000 s.f. or smaller. This increase would create more flexibility for certain types of lots, thereby increasing the total number of DADUs constructed.
- Removing restrictions on household sizes for lots with DADUs. This change would allow the opportunity for larger DADUs that could accommodate changing household sizes and would be more attractive to families with children.

Additionally, to support property owners investing in DADUs, we encourage the City to avoid adding any restrictions to the occupancy or sale of DADUs. These additional barriers would act as a disincentive for property owners to invest in DADUs, which runs contrary to the City's goals for density.

The above suggestions better achieve the City's ultimate goal of increasing housing opportunities on a scale that respects single family neighborhoods. We ask that OPCD study these suggestions during the EIS process.

We appreciate the opportunity to comment on the EIS Scoping, and thank you for your consideration.

Sincerely,



Ian Morrison

**ADUEIS**

---

**From:** Matt Hutchins <matt@castarchitecture.com>  
**Sent:** Thursday, November 16, 2017 9:52 AM  
**To:** ADUEIS; Gonzalez, Lorena; Burgess, Tim; Sawant, Kshama; Juarez, Debora; Bagshaw, Sally; Harris-Talley, Kirsten; O'Brien, Mike; Harrell, Bruce; Nyland, Kathy; Johnson, Rob; Herbold, Lisa; Assefa, Samuel; Durkan, Jenny  
**Subject:** 508 ACCESSORY DWELLING SUPPORTERS say we can do MOAR to support housing options, affordability and greener infill development.  
**Attachments:** ADU EIS PETITION COMMENTS AND SIGNATORIES.pdf

Over the last few months there have been intense online discussions about backyard cottages in conjunction with the ADU EIS. Recently a new group, MOAR, formed and met in person to brainstorm the many ways we could make backyard cottages more frequent, and in turn, the city more affordable.

*MOAR (More Options for Accessory Residences) is a group of citizens concerned with the future of the city, housing availability and affordability. We have diverse backgrounds, experiences and housing situations, but we're all Seattleites who want our city to allow more options for accessory residences. For us, our neighbors, and future generations.*

We put our thoughts and experiences together into a petition, "[10 Ideas to address Seattle's housing shortage](#)". It is being submitted as an official response to the request for public comment to the Environmental Impact Statement for the Accessory Dwelling Unit.

I've attached the petition with more that 500 supporters we're found in just over 3 weeks.

If you visit the petition website ([link](#)) you will see the fantastic reasons people have given for supporting MOAR's ideas for new housing options.

We ask that you continue the difficult work to educate Seattleites about the important connections between housing choice, affordability and climate justice.

We'll be hosting some informal monthly meetups to share stories and policy ideas with homeowners, renters, realtors, builders, mortgage brokers, environmentalists and groups like the AARP.

If you have any questions for the group, please feel free to contact me.

—  
Matt Hutchins  
206 501 7051

## MOAR - More Options for Accessory Residences

Recipient: Office of Planning & Community Development, Seattle's Department of Neighborhoods

Letter: Greetings,

There are additional topics that I would like to see addressed in this study for backyard cottages (EIS for ADUs).

Please take the following into consideration:

Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage.

Here are my suggestions related to the scope of the EIS:

Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people.

Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production.

Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF.

Housing Opportunity Overlay. Create a ring overlay within 10 minute walkshed of schools, parks, urban villages, arterials and frequent transit, where additional housing is desired. Allow Residential Small Lot zoning without MHA in Overlay. Make parking requirements for additional units voluntary

Upgrading non-conforming housing types and uses, such as duplexes, established before 1995. There are 4300 grandfathered duplexes and triplexes within SF zones and they are subject to different rules such as

continuing use and limitations on expansion/upgrades. They should have the same flexibility under the code that applies to their neighbors in SF zones.

Buffering detached houses from higher zones: If adjacent zoning is not SF 5000 zoning, allow flexible increase in height, or setbacks to help with transition to other zones (LR, NC)

Make accessory dwelling units easier to built. Allow exceptions for handrails and parapets over height limit. Decks over 18" and covered areas should not count toward accessory use square footage, but should have stand alone total. Allow separate metering of utilities. When expanding a garage/existing non-conforming use, allow vertical expansion in line with existing structure, rather than to setbacks. Allow extra height for flat roofs when used as a green roof.

Study using Floor Area Ratio to restrict size of development and incentivize additional housing units. Currently we are seeing many new single dwellings that dwarf the house that was torn down. On a 5000 SF lot, with lot coverage at 35%, and a height limit of 30', we currently allow a house to be 5250 SF. Using a .5 FAR for single dwelling unit properties, allowing .7 for two dwelling units and .8 for three dwellings per lot, the same property would allow 2500 SF, 3500 SF or 4000 SF. Restricting maximum FAR will make teardowns/McMansions less viable, put a break on gentrification, and insure that many more housing units and options are built. FAR limitations will create many lots with dwellings with mix of sizes and prices.

Double Ownership. Allow split ownership of lots with existing house and new cottage, like a fee simple subdivision, provided the cottage was legally established. Create template for condominium-like agreements to share lot ownership between existing house and new cottage. Seattle has no starter homes and this would create new opportunity for ownership. If we agree ownership is an aspiration, creating more affordable options such as this would be desirable.

Allow homeowners to qualify for small loans from Office of Housing from pool of MHA payments when creating additional dwellings. One of the key criticisms of MHA is whether affordable housing created will be well distributed, and by making the available loans applicable at residential scale, on a parcel by parcel basis, there will be new affordable housing integrated into every neighborhood. The other difficulty most people face when creating a DADU is securing financing, and having an additional source would help many owners create their own.

# Comments

Name	Location	Date	Comment
Matt Hutchins	1, WA	2017-10-20	Seattle has a housing shortage because we aren't building enough new dwellings. If families today can't find housing they can afford, ask yourself how is that going to affect the city over the next generation, if every year our land use policies put us further behind. I support these solutions because it prioritizes nearly invisible infill density, sprinkled across the whole city. Each is targeted to create more options for affordable housing!
Elizabeth Mountsier	Seattle, WA	2017-10-20	I believe that these are wonderful, implementable ideas to address Seattle's housing shortage. We should be thinking 'more' flexibility not less for 'Residential' zones!
Caleb Heeringa	Seattle, WA	2017-10-20	We cannot claim to be an equitable or environmentally conscious city when \$1 million+ single family homes are the only new residences that can be added to 2/3 of our city.
Susan George	Seattle, WA	2017-10-20	I wish the city would make it easier for me to rent part of my house out. I'm a senior and I don't need all of my home. I also have a detach garage and would love to build a accessory unit above it. Question how to fund it... I might add I have extra parking . Broadview is a great neighborhood w/ large lots, 8,000- 15,000. The city needs to think outside the box.
Alyce Tibbetts	Seattle, WA	2017-10-20	We need more flexibility in housing.
Whitney Rearick	Seattle, WA	2017-10-20	This city needs more housing options! This set of proposals is a great start.
chrystine kim	Seattle, WA	2017-10-20	Single women as they age have more chance of displacement because of having staying home with children, unequal pay scale during working years, and less likely to re-marry. Allowing them to have control of their finances by giving them a developer hat helps them age in place, an important aspect for women.
chrystine kim	Seattle, WA	2017-10-20	Women have more chance of displacement because of having stayed home with children, unequal pay scale during working years and are less likely to re-marry. Helping them maximize their finances by giving them a developer hat helps age in place, an important aspect for women.
James Madden	Seattle, WA	2017-10-20	Seattle needs more homes to fulfill our welcoming values. These types of homes add great human scale and architectural interest to neighborhoods.
Deena Fuller	Seattle, WA	2017-10-20	Because I love my city and want to maintain its diversity - including economic diversity.
Susan Gleason	Seattle, WA	2017-10-20	Please: more affordable housing options; more flexibility in housing; more equitable zoning and land use.

Name	Location	Date	Comment
christine coe	Seattle, WA	2017-10-20	I believe this is a way to maintain neighborhood character while increasing housing stock.
Sarah Burnett	Minneapolis, MN	2017-10-20	Our city needs more affordable housing options in order to maintain a balanced economic diversity. \$500K+ houses are not affordable by the masses.
Gloria Savitski	Danville, CA	2017-10-20	Most cities are in need of these changes.
Mac McGregor	Seattle, WA	2017-10-20	We need diverse solutions for our housing crisis and ways to help homeowners afford to keep their homes.
Ketsy Nelson	Tukwila, WA	2017-10-20	Because I could not get better housing due to out dates rules.
Kelly Sommerfeld	Seattle, WA	2017-10-20	Given the scarcity of housing and astonishing escalation of rents and home prices, the very minimum is to allow more accessory dwelling units into Single Family zoning. This is a perfect opportunity to look beyond the backyard cottage at what more we could do to solve our housing shortage. Other comments or suggestions related to the scope of the EIS. Change zone name from 'Single Family' to 'Residential.' Our current 'Single Family' has a long history of duplexes, triplexes, corner stores and apartments, prior to downzoning, and renaming the zone removes a mental roadblock about what residential areas are for: people. Waive building permit fees for 5 years for AADUs and DADUs. Portland uses this incentive to permit nearly one per day, 6 times the rate of Seattle's accessory dwelling unit production. Use Green Building incentives similar to other permit types: Allow 10% increase in size and height for projects on lots over 4000 SF. Allow 20% increase for lots over 5000 SF. Housing Opportunity Overlay
Andrew Katz	Seattle, WA	2017-10-20	It's long overdue to remove barriers to gentle-infill housing throughout Seattle, so that more people have more options to find affordable places to live near great neighbors, schools, and parks.
Stefan Hampden	Seattle, WA	2017-10-21	Backyard Cottages are a great typology for encouraging responsible and contextual density in Seattle's single family zones. Current restrictions have stymied their growth - we need to see common sense changes made to land use code to encourage their development.
Julie Hampden	Seattle, WA	2017-10-21	Backyard cottages are an essential strategy for encouraging responsible growth within and already established urban fabric.
Joan Weintraub	Frederick, MD	2017-10-21	Need more affordable housing
Maureen Brinck-Lund	Seattle, WA	2017-10-21	We need more options for today's smaller households to continue to live in neighborhoods. Options to allow a mix of households that includes old, young, renters and owners. Increased density to foster improved transportation and access to services.
H. Pike Oliver	Seattle, WA	2017-10-21	We need more housing option in Seattle!
Victoria McCormick	Graham, WA	2017-10-22	Retirees need homes too! The back yard cottages also help students and disabled people afford a place to live instead of on the streets

Name	Location	Date	Comment
			of our city or in cars!Respect differences! Cordially, Accessory Unit Dweller! VMC
david rush	seattle, WA	2017-10-22	I appreciate the capitol investment in the smaller city parcels that help to deter the 'tear it down and build big' mentality currently flowing through our city.
Jill Rullkoetter	Seattle, WA	2017-10-22	I want more affordable and available housing in Seattle. Let's make it possible for young adults to rent or buy in the city in which they were raised. Read this petition -- lots of good ideas that can help address the housing problems in Seattle.
Hans Rasmussen	Seattle, WA	2017-10-22	Seattle needs more housing and living opportunities. This is a moral and pragmatic imperative. Ideas like these would provide more tools and opportunities to fill that need. Our policy visions need to match the scale of the problem. 50k units in 10 yrs is a start, but doesn't go far enough when looking at population growth trends and projections, and the low carbon footprint unique to habitation in Seattle.
Gale Myles	Seattle, WA	2017-10-23	I believe in tiny houses.
Scott Alspach	US	2017-10-23	We need a denser more walkable city. Increasing the types of housing allowed is a great step towards that!
Linda Hoedemaker	Seattle, WA	2017-10-23	I believe in urban density.
Shelley Minden	Seattle, WA	2017-10-23	Please support backyard cottages.
Julia Derby	Seattle, WA	2017-10-23	This is a way to protect my neighborhood from new McMansions or big condos . I want to retain the neighborhood feel.
Robin Moore-Slater	Seattle, WA	2017-10-23	This is a better answer than most of HALA brings forth. When former mayor decided to benefit the developers, then the developers over-reached, and the communities got left out. This will help redress that.
Ediane Farren	US	2017-10-24	Single-family dwellings are precious
Aileen Nuhfer	Summerville, SC	2017-10-24	I think this is a problem in every state. We should make this an all aware petition. Every state should look at this problem. You go Seattle! Let's spread the word.
Victoria McCormick	Graham, WA	2017-10-25	Do you know how to save a life?
Eric Aderhold	Seattle, WA	2017-10-25	I strongly support nine of the ten recommendations on here. They're very common-sense ways to make for a more equitable distribution of housing in Seattle's residential zones.I do take issue with the idea of reducing the maximum single-family house size. I believe that simply opening up the option to build more units on a currently single-family lot will be transformative. I believe that prohibiting a few rich people from building a big new house is not necessary to achieve this goal, and it is also unnecessarily divisive.
Lindsay Stewart	seattle, WA	2017-10-25	we need housing options- not hard to understand.

Name	Location	Date	Comment
GayLee Kilpatrick	Olympia, WA	2017-10-26	This is a perfect way to address the needs of single or childless couples who don't need the excessive space of a multi-bedroom house!
Raven Campbell	Seattle, WA	2017-10-26	We need more infill options. This is all very sensible.
Otis Blanchard	Seattle, WA	2017-10-27	I'm tired of this generational warfare going on. I was discussing with two other professionals, with 4 bachelors, 1 MS in Computer Science, 1 PhD in Cell Biology and two patents between us. The thought of owning a house in Seattle is out of the question for the married couple where one has a PhD's and the other has MS in Computer Science. Seattle homeownership is only for inherited wealth and startup company owners? The rest of us are priced out! The generational warfare is insane!
John Clary	Garland, TX	2017-10-27	I have lived in places where they allowed them, and they are great for retired couples and singles.
Matt Hutchins	1, WA	2017-10-27	thanks for still signing Eric. 9 out of 10 isn't bad!
Jessica Letaw	Ann Arbor, MI	2017-10-27	I believe part of human decency and civilization lies in housing as many people as possible.
Brooke Brod	Seattle, WA	2017-10-27	Seattle urgently needs to expand access to housing to meet the needs of families, the unsheltered, seniors, working people, and more. Without creating more opportunities for infill housing we will just put more pressure on other cities, on our state parks, on our farmlands, and more.
Christina Ellis	seattle, WA	2017-10-27	I think these are all great ideas to help make our city more affordable for all people!
Jean Jones	US	2017-10-27	Hey,After seeing an ad for the opponent of Jenny Durkan for mayor, I have decided to vote for Jenny Durkan.Jenny Durkan's opponent actually says in her second selling point under "homelessness"; "prevent evictions";I will therefore be voting for Jenny Durkan for mayor because it is already too difficult to get a rogue tenant or squatter out. Jenny's opponent's selling point would make it impossible.Imagine forcing a tenant to stay--no move-out or, even the way it is for us owners now, insisting they can only leave for one of 18 reasons.Jenny Durkan makes no such threats as her opponent does, and seems the safer choice.
steven lynch	Rangeley, ME	2017-10-28	I live in just such a tiny house that is affordable for me.
Peter McLaughlin	Danvers, MA	2017-10-28	I lived in Seattle and loved it there. anything to help
Annamalai Bowie	India	2017-10-28	Just for Steve !
pat mcewen	Lillooet, Canada	2017-10-29	This is just good common sense for downsizing seniors - for young families pay off the mortgage. I support this proposal!
Norah Willett	Seattle, WA	2017-10-30	People who make less than six figures are being forced out of Seattle due to not being able to afford housing. It isn't right that

Name	Location	Date	Comment
			most workers should be forced out if they don't want to be . Seattle was always a city with people of all different income levels. Sure, some areas were more upscale, but not the entire city.
Jessica Wilson	Windsor, Canada	2017-10-30	IN support
Will Greene	Tempe, AZ	2017-10-30	This is the first (and very easiest) step to a more walkable, dense, and environmentally sustainable city. Please don't give in to the exclusionist NIMBY's.
Dewey Potter	Seattle, WA	2017-10-31	These actions are long overdue.
Frith Barbat	Seattle, WA	2017-10-31	If we'd been able to put a backyard cottage in our garden, I might still own our home. As it is, we had to sell, and now pay over \$4000/month between two divorced parents, to house us and our son.
carolyn kinch	Coupeville, WA	2017-11-01	Everyone deserves a safe, affordable refuge to replenish Body & Soul..
Cary Westerbeck	Kenmore, WA	2017-11-01	It's vital that we bring back a variety of housing in our city, and change single family zones to residential zones. Missing middle housing is critical to making a vibrant, livable city. Additionally, parking should never drive what can be built in a rapidly growing city.
Kirsten Murray	Seattle, WA	2017-11-01	I care about affordable housing in our community
Elizabeth Campbell	Seattle, WA	2017-11-01	Support expanded DADU option for personal reasons, need space for dependent family member
nic rossouw	seattle, WA	2017-11-01	It is a good proposal
Bryan Louisell	Brattleboro, VT	2017-11-01	Adu's can provide additional income, smaller footprints, higher density, more revenue, multigenerational living, less sprawl, less traffic, and lessen the environmental impact of the alternatives
Melissa Curit	Otisfield, ME	2017-11-01	Safe and affordable housing should be accessible to all. DADUs are a good solution for those who need to downsize, or need an affordable option to housing.
Ryan Packer	Seattle, WA	2017-11-04	Not increasing housing options like this is NOT an option.
Li Blalock	San Antonio, TX	2017-11-05	I support this petition. Make housing and affordable. What the greedy and smug wealthy derailed can be undone. They are doing the same thing in California. Don't break laws; bend them. Every level of Government has a door, from Federal on down. Find it. It's there.
Lee Goldman	Seattle, WA	2017-11-06	I want to see more diverse forms of development in SF zones
Angelica Spates	Burien, WA	2017-11-13	We need affordable homes for everyone

Name	Location	Date	Comment
Devin Glaser	Seattle, WA	2017-11-13	Just spent the weekend in Beacon, NY in a backyard cottage. It was warm, welcoming, and a beautiful place to stay. Seattle needs more housing options like this.
Mary Thompson	Tacoma, WA	2017-11-13	I live in University Place and have such a unit. It is attractive and affordable. Units like mine can prove to be affordable and attractive for Seattle.
Anton Babadjanov	Seattle, WA	2017-11-13	We need to share the city.
Matt Lowe	Boston, MA	2017-11-14	Seattle needs more common sense housing options!
Andy McConnell	Seattle, WA	2017-11-15	I've been a proponent of density rather than sprawl for years. We set up urban growth boundaries years ago, here is our opportunity to tackle density in more ways than knocking houses down and replacing them with skinny, double tall. Please make it easier to permit DADUs and ADUs....
Shannon Parks-Beck	Seattle, WA	2017-11-15	Housing in Seattle needs a thoughtful, multi-prong approach. Let's figure this out.

BEYOND BACKYARD COTTAGES: MOAR (MORE OPTIONS FOR ACCESSORY RESIDENCES) PETITION SUPPORTERS

	Name	City	State	Postal Code	Country	Signed On
1	Laura Loe				US	10/20/2017
2	Matt Hutchins	Seattle	WA	98116	US	10/20/2017
3	michael eliason	Kent	WA	98035	US	10/20/2017
4	David Kaatz	Seattle	WA	98107	US	10/20/2017
5	Matt Gangemi	Seattle	WA	98119	US	10/20/2017
6	danny pinsker	Seattle	WA	98166	US	10/20/2017
7	Bryan Kirschner	San Carlos	CA	94070	US	10/20/2017
8	Patrick Taylor	Seattle	WA	98115	US	10/20/2017
9	Alexander Broner	Seattle	WA	98122	US	10/20/2017
10	Nathan Franzen	Seattle	WA	98122	US	10/20/2017
11	Jenny Bouffiou.	Seattle	WA	98125	US	10/20/2017
12	Hugh Geenen	Seattle	WA	98107	US	10/20/2017
13	Chris Patterson	Seattle	WA	98112	US	10/20/2017
14	Ian Rutherford	Seattle	WA	98144	US	10/20/2017
15	Joyce Jackson	Walnut Creek	CA	94596	US	10/20/2017
16	Benj Wadsworth	Seattle	WA	98125	US	10/20/2017
17	Jayml Mistry	Seattle	WA	98107	US	10/20/2017
18	Carol Harlow	Seattle	WA	98136	US	10/20/2017
19	dan cappello	lawrence	PA	15055	US	10/20/2017
20	Elizabeth Mountsier	Seattle	WA	98105	US	10/20/2017
21	Caleb Heeringa	Seattle	WA	98119	US	10/20/2017
22	kathy clark	Bellingham	MA	2019	US	10/20/2017
23	Edward Hodapp	Sammamish	WA	98074	US	10/20/2017
24	Tami cole	Seattle	WA	98103	US	10/20/2017
25	Alexa Sparks	Seattle	WA	98102	US	10/20/2017
26	Devra Darley				US	10/20/2017
27	Susan George	Seattle	WA	98133	US	10/20/2017
28	Diane Oakley	Seattle	WA	98115	US	10/20/2017
29	Elizabeth Norville	Seattle	WA	98115	US	10/20/2017
30	Ashwin Warrior	Seattle	WA	98102	US	10/20/2017
31	Alyce Tibbetts	Seattle	WA	98103	US	10/20/2017
32	Sarah Parkinson	Seattle	WA	98118	US	10/20/2017
33	Julie Reese	Seattle	WA	98117	US	10/20/2017
34	Darby Bundy	Seattle	WA	98117	US	10/20/2017
35	Whitney Rearick	Seattle	WA		US	10/20/2017
36	c k	Seattle	WA	98118	US	10/20/2017
37	Alison Laird Craig	New York	NY	10040	US	10/20/2017
38	Steve Grundmeier	Seattle	WA	98122	US	10/20/2017
39	James Woodley				US	10/20/2017
40	Zhu Zhu Xiao	Seattle	WA	98105	US	10/20/2017
41	Michael Meer				US	10/20/2017
42	Jay Lazerwitz	Port Orchard	WA	98367	US	10/20/2017
43	Ted Davis	Seattle	WA	98122	US	10/20/2017

44	Alisha Fuller	Beaverton	OR	97008	US	10/20/2017
45	Renee Peterson	Seattle	WA	98133	US	10/20/2017
46	Alex Cecchini	Kilkenny	MN	56052	US	10/20/2017
47	jacob lee	Seattle	WA	98122	US	10/20/2017
48	James Madden	Seattle	WA	98102	US	10/20/2017
49	Kimberly Kinchen	Miami	FL	33132	US	10/20/2017
50	anna paulson	Seattle	WA	98102	US	10/20/2017
51	Matthew Johnson	Seattle	WA	98118	US	10/20/2017
52	Karen DeLucas	Seattle	WA	98112	US	10/20/2017
53	Deena Fuller	Seattle	WA	98108	US	10/20/2017
54	Onie Kahn				US	10/20/2017
55	Susan Gleason	Seattle	WA	98117	US	10/20/2017
56	Anne Johnson	Seattle	WA	98118	US	10/20/2017
57	christine coe	Seattle	WA	98118	US	10/20/2017
58	Nicholas Efthimiadis	Seattle	WA	98122	US	10/20/2017
59	Charles Bond		WA		US	10/20/2017
60	Carol Friske	Lake Stevens	WA	98258	US	10/20/2017
61	Sarah Hill				US	10/20/2017
62	Mark Eaton		WA		US	10/20/2017
63	Joshua Newman	Seattle	WA	98115	US	10/20/2017
64	Stephan Schier	Seattle	WA	98101	US	10/20/2017
65	Nick Etheredge				US	10/20/2017
66	Jo Ann Draughon	Carlsbad	CA	92008	US	10/20/2017
67	Gloria Savitski	Danville	CA	94506	US	10/20/2017
68	Matthew Maddox	Gig Harbor	WA	98332	US	10/20/2017
69	Meg Guillard	Seattle	WA	98115	US	10/20/2017
70	Rich Knox	Seattle	WA	98122	US	10/20/2017
71	Mac McGregor	Seattle	WA	98177	US	10/20/2017
72	Angela Rapada				US	10/20/2017
73	Adriane Armbruster	Seattle	WA	98122	US	10/20/2017
74	Ketsy Nelson	Tukwila	WA	98168	US	10/20/2017
75	Michele McKittrick	Lakewood	WA	98499	US	10/20/2017
76	Deva Samuels	Seattle	WA	98136	US	10/20/2017
77	Kate Krueger	Seattle	WA	98144	US	10/20/2017
78	Chris Hyatt	Renton	WA	98055	US	10/20/2017
79	Kelly Sommerfeld	Seattle	WA	98144	US	10/20/2017
80	Brandon Woodward	Seattle	WA	98118	US	10/20/2017
81	Sofia Soto				US	10/20/2017
82	Andrew Katz	Seattle	WA	98199	US	10/20/2017
83	Adam Clements				US	10/20/2017
84	Craig Hill				US	10/20/2017
85	Brittany Clements				US	10/21/2017
86	Stefan Hampden	Seattle	WA	98115	US	10/21/2017
87	Robert Seidel	Seattle	WA	98118	US	10/21/2017
88	Adam Prairie				US	10/21/2017
89	Ben Woodward				US	10/21/2017
90	Elizabeth Day	Seattle	WA	98117	US	10/21/2017

91	Bec Chapin		WA		US	10/21/2017
92	Juliet Anderson	Seattle	WA	98115	US	10/21/2017
93	Lauren Thomas	Bonney Lake	WA	98391	US	10/21/2017
94	Leah Missik				US	10/21/2017
95	Kristi Johnson	Seattle	WA	98155	US	10/21/2017
96	Rachael Ludwick	Shelton	WA	98584	US	10/21/2017
97	Raleigh Koritz	PLYMOUTH	MN	55442	US	10/21/2017
98	Eric Smith	Seattle	WA	98101	US	10/21/2017
99	Juliana Wesner	Seatttle	WA	98105	US	10/21/2017
100	Maruta Skujina				US	10/21/2017
101	Peter Loyd	Seattle	WA	98115	US	10/21/2017
102	Fabio Governato	Seattle	WA	98103	US	10/21/2017
103	Scobie Puchtler	Tacoma	WA	98445	US	10/21/2017
104	Michael Nash				US	10/21/2017
105	Glenn Pittenger	Seattle	WA	98115	US	10/21/2017
106	Cari Simson	Seattle	WA	98060	US	10/21/2017
107	Juliette Johnson	Kenner	LA	70063	US	10/21/2017
108	Joe Wolf	Seattle	WA	98102	US	10/21/2017
109	CURTIS WALTON	SEATTLE	WA	98102	US	10/21/2017
110	Scott Veirs	Seattle	WA	98115	US	10/21/2017
111	Susan Ross	Olympia	WA	98516	US	10/21/2017
112	Joel Colvos	Seattle	WA	98104	US	10/21/2017
113	Kendra Kelly	Seattle	WA	98133	US	10/21/2017
114	kimberly shavender	Seattle	WA	98115	US	10/21/2017
115	Sean Wilkins	Seattle	WA	98117	US	10/21/2017
116	Steve Schubert	Seattle	WA	98115	US	10/21/2017
117	David Neiman	Seattle	WA	98122	US	10/21/2017
118	Forrest Murphy	Seattle	WA	98122	US	10/21/2017
119	Eric Noll				US	10/21/2017
120	Rick Mohler	Kent	WA	98032	US	10/21/2017
121	David Lahaie	Seattle	WA	98103	US	10/21/2017
122	Jennifer Hudson	Cape Coral	FL	33991	US	10/21/2017
123	Debra Thompson Harvey	Seattle	WA	98060	US	10/21/2017
124	Julie Hampden	Seattle	WA	98115	US	10/21/2017
125	Carissa Knipe	Seattle	WA	98109	US	10/21/2017
126	Kirsten Wild	Renton	WA	98059	US	10/21/2017
127	Jorie Wackerman	Seattle	WA	98107	US	10/21/2017
128	Tung Lai				US	10/21/2017
129	Paige Clifton-Steele	Seattle	WA	98101	US	10/21/2017
130	Joan Weintraub	Frederick	MD	21703	US	10/21/2017
131	Anne Marshall	Seattle	WA	98118	US	10/21/2017
132	Clayton Smith	Seattle	WA	98122	US	10/21/2017
133	Alexander Baard	Seattle	WA	98122	US	10/21/2017
134	Fatima Gulamali	Seattle	WA	98116	US	10/21/2017
135	David Scamehorn				US	10/21/2017
136	Barry Connolly	Seattle	WA	98134	US	10/21/2017
137	Maureen Brinck-Lund	Seattle	WA	98117	US	10/21/2017

138	Mike Knezevich	Seattle	WA	98125	US	10/21/2017
139	Vaula Torkkola	Seattle	WA	98103	US	10/21/2017
140	H. Pike Oliver	Seattle	WA	98121	US	10/21/2017
141	Marilee Fuller	Seattle	WA	98102	US	10/21/2017
142	Victoria McCormick	Graham	WA	98338	US	10/22/2017
143	Julie Martin	Frederic	WI	54837-8918	US	10/22/2017
144	Wendi Montgomery	Koloa	HI	96756	US	10/22/2017
145	E. Johnston	Seattle	WA	98112	US	10/22/2017
146	Amy Woodruff	Seattle	WA	98060	US	10/22/2017
147	Ramsey Jones	Seattle	WA	98102	US	10/22/2017
148	david rush	seattle	WA	98103	US	10/22/2017
149	Marco Suen		WA		US	10/22/2017
150	Linda Wackerman	Charlotte	VT	5445	US	10/22/2017
151	Joe Rodin	Seattle	WA	98103	US	10/22/2017
152	Eric Thorsen	Seattle	WA	98060	US	10/22/2017
153	David Wood	Shelton	WA	98584	US	10/22/2017
154	Caroline Tobin	Florissant	MO	63031	US	10/22/2017
155	jean hindle	Seattle	WA	98060	US	10/22/2017
156	Amanda Skibeness	Kirkland	WA	98034	US	10/22/2017
157	Charter Harrison	Seabeck	WA	98380	US	10/22/2017
158	Tim Wadsworth	Boulder	CO	80302	US	10/22/2017
159	Loma Vander Houwen	Seattle	WA	98121	US	10/22/2017
160	Al Levine	Kent	WA	98031	US	10/22/2017
161	Jessica Winter-Stoltzman	Seattle	WA	98103	US	10/22/2017
162	Susan Smith		CA		US	10/22/2017
163	chelsea leyland	Seattle	WA	98115	US	10/22/2017
164	Scott Goodner	Seattle	WA	98108	US	10/22/2017
165	Bob Anderton	Seattle	WA	98106	US	10/22/2017
166	Barbara Shaiman	Seattle	WA	98144	US	10/22/2017
167	Nicole Keenan	Tacoma	WA	98405	US	10/22/2017
168	Linda Summers	Mercer Island	WA	98040	US	10/22/2017
169	Mel Curtis	Seattle	WA	98115	US	10/22/2017
170	Gael Eichler	Seattle	WA	98101	US	10/22/2017
171	Jill Rullkoetter	Seattle	WA	98103	US	10/22/2017
172	Jerri Eckmann				US	10/22/2017
173	Lisa Harris	Seattle	WA	98101	US	10/22/2017
174	collin wolff	Chico	CA	95928	US	10/22/2017
175	Hans Rasmussen				US	10/22/2017
176	Patrick Donnelly				US	10/22/2017
177	Gale Myles	Seattle	WA	98108	US	10/23/2017
178	Holly Ferguson	Seattle	WA	98103	US	10/23/2017
179	Luzita Roll	Seattle	WA	98105	US	10/23/2017
180	Matia Ling				US	10/23/2017
181	Lisa Querido	Seattle	WA	98144	US	10/23/2017
182	Keith Whiteman	Seattle	WA	98103	US	10/23/2017
183	Evan Collins	Fairfax Station	VA	22039	US	10/23/2017
184	Ben Garwin	Seattle		98122	US	10/23/2017

185	Scott Alspach				US	10/23/2017
186	Todd Sawicki	Seattle	WA	98107	US	10/23/2017
187	Joaquin Gauna	Seattle	WA	98166	US	10/23/2017
188	Chris Livsey	Stillwater	OK	74078	US	10/23/2017
189	Linda Hoedemaker	Seattle	WA	98105	US	10/23/2017
190	McCall Pace	Edmond	OK	73003	US	10/23/2017
191	Maire Kushner				US	10/23/2017
192	Janna Lufkin	Redmond	WA	98052	US	10/23/2017
193	Karol Westphal	Seattle	WA	98115	US	10/23/2017
194	Greg Lange	Friday Harbor	WA	98250	US	10/23/2017
195	Olivia Taguinod	Everett	WA	98208	US	10/23/2017
196	Tim Becker	Seattle	WA	98177	US	10/23/2017
197	Shelley Minden	Seattle	WA	98102	US	10/23/2017
198	Julia Derby	Seattle	WA	98103-6232	US	10/23/2017
199	tova elise cubert	Seattle	WA	98122	US	10/23/2017
200	Patty Foley	Renton	WA	98055	US	10/23/2017
201	Amanda Breeding	Bothell	WA	98012	US	10/23/2017
202	Robin Moore-Slater	Seattle	WA	98103	US	10/23/2017
203	Katia Blackburn	Seattle	WA	98117	US	10/23/2017
204	frances connolly	Kent	WA	98032	US	10/23/2017
205	Kelly Morgan	Seattle	WA	98117	US	10/23/2017
206	Lisa Ballatore				US	10/23/2017
207	Amy Hartman	Austin	TX	78704	US	10/23/2017
208	Sandra Hankins	Seattle	WA	98122	US	10/23/2017
209	Matthew Padgett	Seattle	WA	98103	US	10/23/2017
210	Benjamin Gould	Seattle	WA	98103	US	10/23/2017
211	Randal Ramig	Seattle	WA	98115	US	10/23/2017
212	Jeffrey Pelletier				US	10/24/2017
213	Ace Houston	Seattle	WA	98122	US	10/24/2017
214	Taylor Welling	Bellevue	WA	98006	US	10/24/2017
215	Chetan Sharma	Seattle	WA	98122	US	10/24/2017
216	Heidi Benson	Kailua	HI	96734	US	10/24/2017
217	Guy Lofstrom	Wenatchee	WA	98801	US	10/24/2017
218	Brenda Choi	Las Vegas	NV	89121	US	10/24/2017
219	Ediane Farren				US	10/24/2017
220	Troy Heerwagen	Seattle	WA	98103	US	10/24/2017
221	Kristoffer Hutchins	Seattle	WA	98107	US	10/24/2017
222	Molly Tennis	Paris		75001	France	10/24/2017
223	Ryan Anderson	Seattle	WA	98155	US	10/24/2017
224	Austin Valeske	Seattle	WA	98102	US	10/24/2017
225	Ron Day	Seattle	WA	98116	US	10/24/2017
226	Michael Caci	Bremerton	WA	98312	US	10/24/2017
227	Amy Avnet	Seattle	WA	98103	US	10/24/2017
228	Teresa Abrahamson	Seattle	WA	98115	US	10/24/2017
229	Angela Compton	Seattle	WA	98102	US	10/24/2017
230	Jim MacConnell	Kent	WA	98032	US	10/24/2017
231	Aileen Nuhfer	Summerville	SC	29485	US	10/24/2017

232	Scott Claassen	Seattle	WA	98103	US	10/24/2017
233	elizabeth gay	Seattle	WA	98103	US	10/24/2017
234	Michael Murray	Spokane	WA	99217	US	10/24/2017
235	Deborah Spiegelman	seattle	WA	98107	US	10/24/2017
236	Jon Campbell	Seattle	WA	98060	US	10/24/2017
237	Josh Geyer	Washington	DC	56901	US	10/24/2017
238	Tom Fucoloro	Seattle	WA	98122-4736	US	10/24/2017
239	Jeffrey Linn	Seattle	WA	98103	US	10/24/2017
240	Mark Foltz	Seattle	WA	98103	US	10/25/2017
241	Scott Rankin	Seattle	WA	98117	US	10/25/2017
242	Evelyn Dial	Seattle	WA	98103	US	10/25/2017
243	Eric Aderhold	Kent	WA	98032	US	10/25/2017
244	Erin House	Seattle	WA	98102	US	10/25/2017
245	peter wehrli	Seattle	WA	98121	US	10/25/2017
246	Ben Anderson	Seattle	WA	98121	US	10/25/2017
247	Jesse Willard		WA		US	10/25/2017
248	Mira Po	Seattle	WA	98101	US	10/25/2017
249	Jessica Westgren				US	10/25/2017
250	Tanya Hanson	Seattle	WA	98105	US	10/25/2017
251	Lindsay Stewart	seattle	WA	98122	US	10/25/2017
252	Chris Otto	Moscow	ID	83843	US	10/25/2017
253	Rachel Harris	Seattle	WA	98115	US	10/25/2017
254	Lindsay Brown				US	10/25/2017
255	GayLee Kilpatrick	Olympia	WA	98516	US	10/26/2017
256	Jac F		WA		US	10/26/2017
257	lydia baumgardner	Seattle	WA	98144	US	10/26/2017
258	THOR PETERSON	Seattle	WA	98115	US	10/26/2017
259	Laura Tuck	Seattle	WA	98126	US	10/26/2017
260	Thomas Schmoe	Issaquah	WA	98027	US	10/26/2017
261	Tamara Urwiler	Renton	WA	98058	US	10/26/2017
262	Nathan Carlson	Clinton	WA	98236	US	10/26/2017
263	Jennifer Fujimoto	Seattle	WA	98117	US	10/26/2017
264	Liz Holz	Austin	TX	78751	US	10/26/2017
265	Pete Traube	Seattle	WA	98101	US	10/26/2017
266	Peter Birkedal Peterson	San Diego	CA	92129	US	10/26/2017
267	Corinna Scholtysik	stuttgart / Seattle		70374	Germany	10/26/2017
268	Misha Graham	Seattle	WA	98117	US	10/26/2017
269	Will Gagne-Maynard				US	10/26/2017
270	Raven Campbell	Seattle	WA	98144	US	10/26/2017
271	Ethan Phelps-Goodman	Seattle	WA	98102	US	10/27/2017
272	Betsy Brown	Seattle	WA	98117	US	10/27/2017
273	Bronwyn McNutt	Seattle	WA	98102	US	10/27/2017
274	Jonah Dunham	Seattle	WA	98102	US	10/27/2017
275	Thomas Rakes	Seattle	WA	98102	US	10/27/2017
276	Eivind Bakke	Seattle	WA	98102	US	10/27/2017
277	Erica Sponsler	Seattle	WA	98102	US	10/27/2017
278	Andy Adams	Seattle	WA	98102	US	10/27/2017

279	Brittney Bollay	Seattle	WA	98109	US	10/27/2017
280	robert kaminski	Seattle	WA	98117	US	10/27/2017
281	Katherine Brown	Seattle	WA	98102	US	10/27/2017
282	David Sundine	Seattle	WA	98115	US	10/27/2017
283	Shirley Savel	Seattle	WA	98118	US	10/27/2017
284	Scott Sharba	Seattle	WA	98060	US	10/27/2017
285	Jessica Balsam	Seattle	WA	98116	US	10/27/2017
286	Otis Blanchard	Seattle	WA	98118	US	10/27/2017
287	Myra Lara	Seattle	WA	98102	US	10/27/2017
288	John Clary	Garland	TX	75040	US	10/27/2017
289	Melissa Miller	Seattle	WA	98102	US	10/27/2017
290	Bri Castle	Seattle	WA	98144	US	10/27/2017
291	David Golightly	Seattle	WA	98122	US	10/27/2017
292	Jessica Letaw	Ann Arbor	MI	48104	US	10/27/2017
293	Brooke Brod	Seattle	WA	98105	US	10/27/2017
294	Chelsea Waliser	Seattle	WA	98168	US	10/27/2017
295	Christina Ellis	seattle	WA	98105	US	10/27/2017
296	Robyn Ellis				US	10/27/2017
297	Kelli Refer	Seattle	WA	98115	US	10/27/2017
298	Roy Wilkie	Seattle	WA	98136	US	10/27/2017
299	Paige Van Otten	Seattle	WA	98103	US	10/27/2017
300	Janet Nobis	Seattle		98060	US	10/27/2017
301	Lauri Refer	Littleton	CO	80127	US	10/27/2017
302	Amanda Graham	Seattle	WA	98126	US	10/27/2017
303	Andrew Engelson	Seattle	WA	98122	US	10/27/2017
304	Barbara Bolles	Poulsbo	WA	98370	US	10/27/2017
305	Jerome Veith	Seattle	WA	98122	US	10/27/2017
306	Michael Maddux	Gig Harbor	WA	98335	US	10/27/2017
307	Kelsey Mesher	Seattle	WA	98126	US	10/27/2017
308	Jean Jones				US	10/27/2017
309	Abigail Christensen	Muscoda	WI	53573	US	10/27/2017
310	Andy Jensen	Seattle	WA	98112	US	10/27/2017
311	Catherine Smith	Puerto Vallarta		48290	Mexico	10/28/2017
312	Meaghan McClure	Redmond	WA	98052	US	10/28/2017
313	Douglas Westphal	Homer	AK	99603	US	10/28/2017
314	Deb Fitzpatrick	Seattle	WA	98117	US	10/28/2017
315	Nicola Hogan	London	ENG	SE15 1RU	UK	10/28/2017
316	steven lynch	Rangeley	ME	4970	US	10/28/2017
317	Carolyn French	Coral Springs	FL	33065	US	10/28/2017
318	Allison Shersty	Pompano Beach	FL	33065	US	10/28/2017
319	Peter Mclaughlin	Danvers	MA	1923	US	10/28/2017
320	Annamalai Bowie			606601	India	10/28/2017
321	Kevin Murphy	Fairfax	VA	22032	US	10/28/2017
322	Paul Wirsing	Seattle	WA	98198	US	10/29/2017
323	pat mcewen	Lillooet		VOK 1v0	Canada	10/29/2017
324	Trang Le				US	10/29/2017
325	Saeda Hitner	Seattle	WA	98103	US	10/29/2017

326	Tara French	Seattle	WA	98117	US	10/29/2017
327	Nikki Levine	Seattle	WA	98134	US	10/30/2017
328	Norah Willett	Seattle	WA	98126	US	10/30/2017
329	Christopher Stefan	Seattle	WA	98115	US	10/30/2017
330	Kristina Peterson	Seattle	WA	98117	US	10/30/2017
331	Kimberly Scott	Bothell	WA	98012	US	10/30/2017
332	Amanda Abler	Seattle	WA	98060	US	10/30/2017
333	Juli Cummings	Seattle	WA	98133	US	10/30/2017
334	Will Livesley-O'Neill	Los Angeles	CA	90095	US	10/30/2017
335	Jared Banks	Seattle	WA	98115	US	10/30/2017
336	BRIAN PALIDAR	Seattle	WA	98121	US	10/30/2017
337	Mark Shuler	Seattle	WA	98107	US	10/30/2017
338	cheryl hughes	Seattle	WA	98119	US	10/30/2017
339	JR Fulton	Seattle	WA	98112	US	10/30/2017
340	david taber	Seattle	WA	98122	US	10/30/2017
341	Micheal Lentz	Palm Springs	CA	92264	US	10/30/2017
342	Dejonnee Roder	Colchester		CO1	UK	10/30/2017
343	Deanna Martinez	Seattle	WA	98115	US	10/30/2017
344	Jessica Wilson	Windsor		n8r 1e4	Canada	10/30/2017
345	Dan Bertolet	Seattle	WA	98177	US	10/30/2017
346	Will Greene	Tempe	AZ	85282	US	10/30/2017
347	laura stocker	Seattle	WA	98119	US	10/30/2017
348	Howard Johnson	Mesa	AZ	85205	US	10/30/2017
349	Kimberly Pearson	Sammamish	AZ	98074	US	10/30/2017
350	Rachel Tsai	Bellevue	WA	98008	US	10/30/2017
351	Sheri Newbold				US	10/30/2017
352	Geoffrey Piper	Seattle	WA	98144	US	10/30/2017
353	Sonia Balsky	Seattle	WA	98105	US	10/30/2017
354	mark van akkeren	Boulder	CO	80304	US	10/31/2017
355	Kelly Foster	Bellevue	WA	98007	US	10/31/2017
356	Grace Kim	Tacoma	WA	98424	US	10/31/2017
357	Brice Maryman	Seattle	WA	98118	US	10/31/2017
358	Dorsol Plants	seattle	WA	98106	US	10/31/2017
359	Rebecca Wells	Seattle	WA	98106	US	10/31/2017
360	Amelia Pool	Portland	OR	97205	US	10/31/2017
361	Kara Weaver				US	10/31/2017
362	sandy long	Seattle	WA	98106	US	10/31/2017
363	Dewey Potter	Seattle	WA	98103	US	10/31/2017
364	Collin Foxley	Seattle	WA	98104	US	10/31/2017
365	Lisa Richmond	Seattle	WA	98101	US	10/31/2017
366	Rob Harrison cPHc	Seattle	WA	98101	US	10/31/2017
367	Caleb Killian	Seattle	WA	98133	US	10/31/2017
368	K Doyke	Seattle	WA	98107	US	10/31/2017
369	Heather Lunceford	Seattle	WA	98060	US	10/31/2017
370	Keith Kyle	Spokane	WA	99202	US	10/31/2017
371	Frith Barbat	Seattle	WA	98144	US	10/31/2017
372	Carson Hartmann	Seattle	WA	98122	US	10/31/2017

373	Jason Robideau	Seattle	WA	98103	US	10/31/2017
374	Andrew Fleming	Seattle	WA	98122	US	10/31/2017
375	Jake Heare	Seattle	WA	98105	US	10/31/2017
376	Mike Powe	Seattle	WA	98060	US	10/31/2017
377	Charlie Cunniff	Seattle	WA	98060	US	10/31/2017
378	Douglass McCrae	Seattle	WA	98144	US	10/31/2017
379	david rosenfeld	Seattle	WA	98118	US	11/1/2017
380	Hilery Avritt	Seattle	WA	98144	US	11/1/2017
381	Mitchell Bush	Seattle	WA	98118	US	11/1/2017
382	Michael Faigenblum				US	11/1/2017
383	Valerie Mehring	Seattle	WA	98125	US	11/1/2017
384	Elizabeth Corry	Seattle	WA	98117	US	11/1/2017
385	Rafael Garcia				Singapore	11/1/2017
386	Keegan McChesney				US	11/1/2017
387	Doug Trumm	Seattle	WA	55413	US	11/1/2017
388	Jim Burton	Seattle	WA	98103	US	11/1/2017
389	Daniel Cliney	Seattle	WA	98125	US	11/1/2017
390	Elaine Dyer	Auckland		618	New Zealand	11/1/2017
391	carolyn kinch	Coupeville	WA	98239-3515	US	11/1/2017
392	Cary Westerbeck	Kenmore	WA	98028	US	11/1/2017
393	Ryan Klaus				US	11/1/2017
394	Leanne Hust	Kenmore	WA	98028	US	11/1/2017
395	Robert Swinburne	Brattleboro	VT	5301	US	11/1/2017
396	Ray Bosko	Seattle	WA	98105	US	11/1/2017
397	Sarah McGrath	Renton	WA	98057	US	11/1/2017
398	Kirsten Murray	Seattle	WA	98117	US	11/1/2017
399	Rachel Nagorsky	Seattle	WA	98107	US	11/1/2017
400	ELizabeth Campbell	Seattle	WA	98199	US	11/1/2017
401	Carol june-washington	Wynantskill	NY	12198	US	11/1/2017
402	Chay Casso	Saint Louis	MO	63141	US	11/1/2017
403	nic rossouw	seattle	WA	98115	US	11/1/2017
404	Stuart Arentzen	Seattle	WA	98109	US	11/1/2017
405	Bryan Louisell	Brattleboro	VT	5301	US	11/1/2017
406	Margaret Broen		WA		US	11/1/2017
407	Melissa Curit	Otisfield	ME	4270	US	11/1/2017
408	sudha pande	Stanwood	WA	98292	US	11/2/2017
409	Amy Bratonia-Okray	Milwaukee		53234	US	11/2/2017
410	Greg San Martin	Berkeley	CA	94703	US	11/2/2017
411	Eric Wright				US	11/2/2017
412	Julie Westerbeck	Kenmore	WA	98028	US	11/2/2017
413	Anne Beaverson	Seattle	WA	98102	US	11/2/2017
414	Jessica Breznau	Seattle	WA	98105	US	11/2/2017
415	Jeffrey Goupil	Seattle	WA	98116	US	11/2/2017
416	Friendly Vang-Johnson	Seattle	WA	98125	US	11/2/2017
417	Ali Parizer	Seattle	WA	98115	US	11/2/2017
418	Roy Kim	New York	NY	10005	US	11/2/2017
419	Julianne Howe	Seattle	WA	98107	US	11/2/2017

420	Chong Vang	Minneapolis	MN	55413	US	11/2/2017	
421	Laura Elfline	Seattle	WA	98126	US	11/2/2017	
422	Luke Marcum	Seattle	WA	98133	US	11/2/2017	
423	James Stevens	Seattle	WA	98060	US	11/2/2017	
424	Janna Noble	Pasco	WA	99301	US	11/2/2017	
425	Stephen Savage				US	11/2/2017	
426	Kimberly Scrivner				US	11/2/2017	
427	Philip Patton	Seattle	WA	98103	US	11/2/2017	
428	Desiree Gibson	Seattle	WA	98106	US	11/2/2017	
429	John Renehan	Seattle	WA	98101	US	11/2/2017	
430	Megan Van Woodward	Seattle	WA	98144	US	11/2/2017	
431	Laura Benjamin	Seattle	WA	98109	US	11/2/2017	
432	Paul Mason				US	11/2/2017	
433	Claire Mendelsohn	Seattle	WA	98107	US	11/2/2017	
434	Courtney Baxter	Seattle	WA	98199	US	11/2/2017	
435	Geoff Bigger	seattle	WA	98115	US	11/2/2017	
436	Lorelei Stevens	Seattle	WA	98116	US	11/3/2017	
437	Sarah Rensin	Redmond	WA	98052	US	11/3/2017	
438	Robert Dunham	Castaic	CA	91384	US	11/3/2017	
439	Kathleen Killian	Grand Junction	CO	81506	US	11/3/2017	
440	Eric Bronson	Seattle	WA	98133	US	11/3/2017	
441	William Rubens	Seattle	WA	98125	US	11/3/2017	
442	Elizabeth Bachman	Seattle	WA	98166	US	11/3/2017	
443	Dylan Glosecki	Seattle	WA	98122	US	11/3/2017	
444	Betsy Deichmeister	Grand Junction	CO	81504	US	11/3/2017	
445	Max Mendelsohn	Spokane	WA	99201	US	11/3/2017	
446	Vicki Ladwig	Kirkland	WA	98034	US	11/3/2017	
447	Ryan Surface	Kent	WA	98035	US	11/3/2017	
448	Karen Owens				US	11/3/2017	
449	Sharon hill	Cle Elum	WA	98922	US	11/3/2017	
450	Sean Sullivan	Seattle	WA	98115	US	11/4/2017	
451	Drew Giblin	Seattle	WA	98155	US	11/4/2017	
452	hedy toolen	dumaguete city, negros orient.	AP		Philippines	US	11/4/2017
453	Arabella Horwitz	Bethesda	MD	20816	US	11/4/2017	
454	Ryan Packer	Seattle	WA	98102	US	11/4/2017	
455	Scott Bonjukian				US	11/4/2017	
456	Li Blalock	San Antonio	TX	78233	US	11/5/2017	
457	Eddie Minkoff	Seattle	WA	98155	US	11/5/2017	
458	Alexandra Immel	seattle	WA	98107	US	11/5/2017	
459	Lee Goldman	Seattle	WA	98112	US	11/6/2017	
460	Sam Kraft	Renton	WA	98055	US	11/6/2017	
461	Eduardo Oliveira	Renton	WA	98055	US	11/6/2017	
462	Jeremy Crews	Seattle	WA	98116	US	11/6/2017	
463	Heidi Speight	Seattle	WA	98107	US	11/6/2017	
464	Anne Morgan	Federal Way	WA	98023	US	11/6/2017	
465	Max Hensley				US	11/6/2017	
466	Jennifer Montessoro	Seattle	WA	98103	US	11/7/2017	

467	Noah Cantor	Seattle	WA	98122	US	11/7/2017
468	Jeffrey Snyder	Seattle	WA	98122	US	11/7/2017
469	Matt Chism	Edmonds	WA	98026	US	11/7/2017
470	Alex Bachleda	Seattle	WA	98121	US	11/8/2017
471	Rebecca Deutsch	Seattle	WA	98112	US	11/8/2017
472	Paul Chapman	Bellevue	WA	98007	US	11/8/2017
473	Sarah Rutherford-Bundy	Spokane	WA	99201	US	11/9/2017
474	Pat Campbell				US	11/9/2017
475	Carly Jugler	Seattle	WA	98104	US	11/9/2017
476	Aubrey Pullman	Seattle	WA	98144	US	11/11/2017
477	Emily Krisher	Seattle	WA	98109	US	11/12/2017
478	Angelica Spates	Burien	WA	98146	US	11/13/2017
479	Nicoelle Wilks	Seattle	WA	98102	US	11/13/2017
480	Kim Jones	Seattle	WA	98106	US	11/13/2017
481	Devin Glaser	Seattle	WA	98115	US	11/13/2017
482	Matthew Amster-Burton	Seattle	WA	98102	US	11/13/2017
483	Ann-Marie Stillion	Seattle	WA	98103	US	11/13/2017
484	Kate McLaughlin	Seattle	WA	98133	US	11/13/2017
485	Robert Blumenthal	Seattle	WA	98115	US	11/13/2017
486	Mary Thompson	Tacoma	WA	98466	US	11/13/2017
487	Bill Berger	Seattle	WA	98109	US	11/13/2017
488	Michael Ryker	Bothell	WA	98041	US	11/13/2017
489	Brett Johnston	Fort Lauderdale	FL	33314	US	11/13/2017
490	Rebeckah Johnson	Seattle	WA	98117	US	11/13/2017
491	Anton Babadjanov	Seattle	WA	98121	US	11/13/2017
492	Bevin Farkas	Seattle	WA	98115	US	11/14/2017
493	Calvin Jones	Seattle	WA	98102	US	11/14/2017
494	Angie McCullagh	Seattle	WA	98117	US	11/14/2017
495	Jim McCullagh	Seattle	WA	98102	US	11/14/2017
496	David Lipe	Seattle	WA	98103	US	11/14/2017
497	Matt Lowe	Boston	MA	2116	US	11/14/2017
498	Tim Hammer	Seattle	WA	98103	US	11/14/2017
499	Leah Bauch	Seattle	WA	98102	US	11/14/2017
500	Holly Lin	Seattle	WA	98102	US	11/15/2017
501	Andy McConnell	Seattle	WA	98106	US	11/15/2017
502	Shannon Parks-Beck	Seattle	WA	98117	US	11/15/2017
503	david albright	Seattle	WA	98117	US	11/15/2017
504	Anna St Martin	Seattle	WA	98115	US	11/15/2017
505	David Stoll	Seattle	WA	98109	US	11/15/2017
506	Gordon Werner	Seattle	WA	98122	US	11/15/2017
507	Corina Luckenbach	Seattle	WA	98126	US	11/15/2017

**ADUEIS**

---

**From:** Steve Wilkins <billfriendly@gmail.com>  
**Sent:** Thursday, November 16, 2017 10:03 AM  
**To:** Pennucci, Aly  
**Cc:** Johnson, Rob; O'Brien, Mike; Herbold, Lisa; Gonzalez, Lorena  
**Subject:** Comments\_Accessory Dwelling Units EIS  
**Attachments:** Comments\_Accessory Dwelling Units EIS\_Steve Wilkins.doc

November 15, 2017

Steve Wilkins  
 PO Box 45344  
 Sea., WA 98145

Aly Pennucci  
 Legislative Department  
 P.O. Box 34025  
 Seattle, WA 98124-4025  
 via email to aly.pennucci@seattle.gov

Comments: Accessory Dwelling Units Environmental Impact Statement

Dear Ms. Pennucci:

Please accept my comments regarding proposed ADU/DADU zoning changes to our SF5000 neighborhoods. Alternative 1 (No Action) is the best EIS option for the proposed ADU/DADU legislation now before the Seattle City Council.

The City of Seattle promised neighborhoods as a quid pro quo that development would be contained within boundaries outlined in our Urban Centers and newly designated Transit Centers. Please keep that promise and protect what is truly unique in our many neighborhoods, single family homes. This legislation will turn our SF neighborhoods into non-owner occupied duplexes and triplexes.

The City promised affordable housing in our Urban Centers and Transit Centers. To facilitate this developers are handed twelve and fifteen year Real Estate tax giveaways (MFTE/MHA), no development fees, bonus relaxation of bulk and height restrictions and the plus of not having to provide onsite parking because no one will need cars in a transit hub! The City needs to conduct an evaluation of how well these programs are performing before giving a blank check to the decimation of what is left of our SF neighborhoods. There is nothing in the MFTE/MHA legislation that keeps developers from converting these buildings into condominiums at the end of their tax breaks (giveaways) eliminating all 'low-income' units.

Currently yards and tree coverage are benefits enjoyed in our SF neighborhoods. ADU and DADU combined usage on SF lots offers to remove all trees and block access to views and sunlight enjoyed by adjacent property owners. I assume adjacent property owners will also enjoy an increased RE tax liability because of this zoning change.

This proposed legislation falsely assumes these changes are a 'one size fits all' proposition. Some houses have alleys, some are one story. The location of exits/entrances, DADU height and lot coverage will adversely effect surrounding houses. In my neighborhood ADUs coupled with no owner occupancy rentals has promoted the removal of all

vegetation including back yards which are converted into parking lots. No onsite parking requirements plus allowing increased occupancy from 8 to 12 unrelated individuals will only increase parking problems and traffic impacts. Couple these impacts with removing owner occupancy requirements and you will destroy the unique character of our SF neighborhoods creating duplex and triplex slums.

This proposed legislation does not address any of these negative impacts other than a promise of more affordable housing through increased density.

An example of failed policy (creating more affordable housing units) can be witnessed in the destruction of three single family homes in the University District Urban Center just south of the University Playfield. Three houses providing \$500/mo. rent for fifteen people were removed in favor of nine three story boxes selling for \$600k each. A 'floor' in one of these units rents for \$2-3k a month.

Surrounding houses lost access to sunlight and views. The existing greenery was decimated.

The RPZ was given to our neighborhoods as a way to solve our parking problems. About the only success of this program is another revenue source. My neighborhood, since the inception of the RPZ, has seen the removal of back yards in favor of parking lots. The elimination of onsite parking while allowing a 50% increase in the number of unrelated people that can live on one single family lot is another failure of this proposed legislation. If no one will need cars why does the UD have the largest Audi dealer on the west coast? If no one will need cars why are 'apodment' dwellers allowed to purchase RPZ permits? These units were intentionally built without parking because residents in Urban and Transit Centers won't need cars. More sprawl, more traffic, no solutions.

Personally I have never been able to get enforcement of the RPZ or SMC laws on the books: 11.72.145 expired plates, 11.70.200 illegal street/alley parking, 11.7.240 moving vehicles of another, 11.72.351 Restricted Zone parking. I filed two complaints through the CSB:

14-00080238 & 12-00053137. I documented \$141/day of tickets that were not being given for street use by a City Licensed auto repair shop in my single family neighborhood. The penalty for one of these violations (11.70.200) is revoking their business license. The inability to get enforcement of 'regulations' proposed in this ADU/DADU legislation poses another problem.

I find it very disturbing this EIS suggests there should be:

"increased housing choices...within a 5-minute walk of frequent transit." Anyone using transit in this town is used to changing bus routes. Now with the Sound Transit Husky Stadium station 'on-line' routes have changed yet again. Where then are these moving targets of this imaginary five minute walk? Sound Transit is years behind implementing our light rail package. Until this building block of our transit system is in place the City should take NO ACTION on increasing density in SF neighborhoods based on the moving target of a 'five minute walk of frequent transit.' If this is the basis for these zoning changes then the City needs to wait for the full implementation of Light Rail to Northgate before tearing up our neighborhoods based on a target of ever changing frequent transit routes.

Please examine the failure or successes of the MFTE and MHA programs before you continue to breach promises to our neighborhoods of keeping development within our designated urban center boundaries.

Please honor your commitments to our neighborhoods and find that there are significant environmental impacts with this proposed legislation that need mitigation. Alternative 1 (No Action) is the best EIS option for the proposed ADU/DADU legislation now before the Seattle City Council.

Sincerely,

Steve Wilkins

Enc: Comments\_Accessory Dwelling Units EIS\_Steve Wilkins.doc

CC: Councilmember Lorena Gonzalez

Councilmember Lisa Herbold

Councilmember Rob Johnson

Councilmember Mike O'Brien

**ADUEIS**

---

**From:** buzzz@u.washington.edu  
**Sent:** Thursday, November 16, 2017 11:06 AM  
**To:** ADUEIS  
**Subject:** Accessory Dwelling Unit EIS  
**Attachments:** Accessory-Dwellings.docx

[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)

To whom it may concern

I am submitting the following comments on the scope of the Accessory Dwelling Units Environmental Impact Statement as an attachment. I am very concerned that the proposed legislation will create drastically negative impacts on my neighborhood and on single-family neighborhoods throughout the city. Seattle's single-family neighborhoods contribute in important ways to the character of Seattle both for its citizens and visitors. Full implementation of the proposed legislation would irreparably ruin the character of these neighborhoods physically and as dynamic communities.

My wife and I own a single family home on the top of Queen Anne. For over 30 years we have restored this house, which was built in 1911, and carefully improved its garden. These actions were pursued for our personal pleasure. But they have also contributed positively to the neighborhood character, especially improving its open space characteristics and a number of environmental factors such as tree cover, surface water management and microclimate. We are concerned that the implementation of Council Member O'Brien's proposed Accessory Dwelling Units legislation will bring about the possible destruction in the future of our hard work and reduce the character of this neighborhood.

Thank you for considering my comments.

David C. Streatfield  
2409 11th Avenue West  
Seattle, WA 98119

**ADUEIS@seattle.gov**

To whom it may concern

I am submitting the following comments on the scope of the Accessory Dwelling Units Environmental Impact Statement. I am very concerned that the proposed legislation will create drastically negative impacts on my neighborhood and on single-family neighborhoods throughout the city. Seattle's single-family neighborhoods contribute in important ways to the character of Seattle both for its citizens and visitors. Full implementation of the proposed legislation would irreparably ruin the character of these neighborhoods physically and as dynamic communities.

My wife and I own a single family home on the top of Queen Anne. For over 30 years we have restored this house, which was built in 1911, and carefully improved its garden. These actions were pursued for our personal pleasure. But they have also contributed positively to the neighborhood character, especially improving its open space characteristics and a number of environmental factors such as tree cover, surface water management and microclimate. We are concerned that the implementation of Council Member O'Brien's proposed Accessory Dwelling Units legislation will bring about the possible destruction in the future of our hard work and reduce the character of this neighborhood.

The following comments relate to the City's preliminary identification of elements to be included for analysis in the EIS. The current code is listed in Alternative 1 and is noted as "No Action." Alternative 2 is Council Member O'Brien's proposed changes. My comments fully support the position of the Land Use Review Committee and the Planning Committee of the Queen Anne Community Council, which was sent to you in a letter, signed by Martin Henry Kaplan, AIA, and dated 12 November, 2017.

**Alternative 1 (No Action-Leave Existing Code)-(A)**

**Alternative 2 – Council Member O'Brien's Proposal-(B)**

**1**

**Number of residences allowed on a single-family lot**

**(A) A single-family lot can have one House, plus either one AADU or one DADU, but not both.**

**(B) A single-family lot can have one house, plus an AADU and plus a DADU - 3 residences.**

I support the QACC's recommendation that a single family lot can have one ADU (Accessory Dwelling Unit) OR one DADU (Backyard Cottage) but NOT both, unless the lot exceeds 10,000 square feet, cannot be subdivided by deed restriction, has provable new infrastructure capable of handling increased density, and is located within a specific overlay district where the lots exceed 10,000 square feet and has streets defined in Alternative 3 in #2 below. The proposed change would have far-reaching and drastic, if not draconian impacts, on my neighborhood and other single-family neighborhoods across the City, and would unduly burden the infrastructure in most older single family neighborhoods. Queen Anne and other older city neighborhoods were developed with an infrastructure designed to support one house on each platted property. In many cases this infrastructure is in serious need of updating.

**2**

**Parking**

**(A) One off-street parking space required for an AADU or DADU unless the lot is in an urban village.**

**(B) No off-street parking required.**

One off-street parking space should be required for an AADU and a DADU unless the lot is located in a specific overlay district defined by lots over 8,000 square feet, cannot ever be subdivided through a deed restriction, has provable new infrastructure capable of handling increased density and street widths that can provide parking on both sides. My property lies on a narrow street where parking is permitted only on one side. Increased development on my property would not be possible without improvements to the sewers and required on-site parking

This proposed change would forever alter the character of single-family neighborhoods. Members of the City Council apparently believe that Seattle citizens will give up their cars and ride transit or use bicycles. Their apparent pride in their own transport modes is associated with the mistaken idea that all citizens will follow their example. This is wishful thinking unsupported by facts. Most older citizens are no longer able to ride bicycles and need access to cars to make medical appointments.

**3**

**Owner-occupancy**

**(A) An owner must occupy either the main house or the AADU/DADU 6 months a year.**

**(B) No requirement for an owner to occupy the house, the AADU, or the DADU.**

The owner occupancy requirement should not be changed. This feature of the proposed legislation shows a complete lack of understanding of what is involved in maintaining community character. Vital neighborhoods are those in which resident property owners have a daily presence. If implemented this element of the legislation would utterly destroy single-family neighborhoods in Seattle.

**4**

**Minimum lot size for a DADU 4,000 square feet**

**(A) There no exceptions to the minimum lot size of 4,000 square feet**

**(B) 3,200 square feet**

This proposed change is unacceptable, since most neighborhoods with 4,000 square feet lots are older and have serious infrastructure, and open space issues. This is an example of applying ill considered one-size fits all thinking throughout the city's neighborhoods.

**5**

**Maximum square footage**

**(A) AADU 1,000 square feet, including garage and storage areas; DADU 800 square feet including Garage and storage areas**

**(B) AADU 1,000 square feet, excluding garage and storage areas DADU 1,000 square feet, excluding garage and storage areas**

The neighborhoods with larger lots and wide streets are invariably newer and have newer infrastructure. I support the QACC proposal to allow DADUs on properties larger than 10,000 square feet, that can never be subdivided by deed restriction and have infrastructure capable of supporting increased density, and are located in a specific overlay district where the lots exceed 10,000 square feet and have streets as defined in the Alternative for no. 2.

6

**Maximum height**

**(A) No change from existing height limits, which vary by lot width and range from 15-23 feet.**

**(B) Height limits are 1-3 feet higher than existing limits, depending on lot width.**

I agree with the QACC proposal for this issue.

7

**Lot coverage limit**

**(A) 35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.**

I strongly believe that lot size allowance is directly related to the impacts associated with lot coverage. In a neighborhood containing mostly 5,000 sq ft lots, every lot is allowed to cover about 1,750 sq ft or 35% of the lot with structures. Under Council Member O'Brien's proposal, a 3,200 sq ft lot could cover 1,480 sq ft which is 46.25%. This considerable difference in allowable square feet of coverage could result in much smaller yards with two houses crammed on the backyard, posing privacy issues and eliminating significant tree canopy and open space. The role of open space and tree canopies has not been acknowledged in any of the proposed changes. It is important not to dismiss this issue as a matter of mere beautification. Trees do improve the appearance of both individual properties and neighborhoods. But they also play critical roles in improving the local microclimate and assisting in the management of surface water. I ask that this requirement remain unchanged.

8

**Rear yard coverage limit**

**(A) 40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage)**

**This limit applies in addition to the overall lot coverage limit.**

**(B) 60 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.**

I strongly believe that the existing lot coverage calculations provide protections for single-family neighborhoods and homeowners alike. The proposed 20% increase in lot coverage allowances in rear yards would have a dramatic impact in reducing open space, tree canopy preservation, privacy and bulk development. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

9

**Location of entries**

**(A) DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right-of-way.**

**(B) DADU entrances can be on any façade, provided it is 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way).**

The existing code intentionally respects the privacy of adjacent yards by orienting the entries away from property lines and adjacent homes that would have the greatest impacts. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

**10**

#### **Roof features**

**(A) No exceptions from the height limit are allowed for roof features on accessory structures.**

**(B) Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.**

The exceptions Council Member O'Brien proposes can be abused, have been abused, and can provide significant impacts to neighbors. In reality, many units that have built clerestories, dormers, and other features that add building height add livable square footage beyond what the code permits. All of a sudden, a dormer or clerestory becomes a bedroom. I see significant opportunities for common abuse and believe it should remain limited to the current controls. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

**11**

#### **Household size**

**(A) Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.**

**(B) Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.**

The current code allows 8 unrelated individuals to live on one site, in one house, or in one house plus an ADU, or in one house plus a Backyard Cottage. The City has seen many homes converted to 8-unit Boarding Houses lately in single-family neighborhoods. Council Member O'Brien is proposing raising that limit to 12. This 50% increase has never been proposed before. The greatest concerns connected with increasing this limit are infrastructure capacity, parking, and conversion of single-family neighborhoods. Single-family neighborhoods and individual properties were never engineered to accommodate multi-family densities and such a proposal defies logic in understanding the benefits compared to the significant environmental impacts and burdens. I ask that the alternative of "make no changes" be analyzed and adopted by the City.

**12**

#### **MHA requirements**

**(A) Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones.**

I do not have concerns about this issue, provided that single-family zones remain unchanged, and that all property owners are required to reside in one of 2 residences on a property.

13

### **Rental Registration & Inspection Ordinance (RRIO)**

**(A) Property owners renting one or more units, including in Single Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.**

**(B) No proposed change**

I have no concerns about this issue.

14

### **Concurrency Issues**

The policy and code changes in the City's proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. In the last 15 years Seattle has experienced significant growth in population and building without any commensurate commitment to addressing any of the following concurrency issues. I strongly believe that inviting new growth and density should dictate a concurrent investment in infrastructure before this growth occurs. This has not been happened in Seattle. Consequently, property owners and renters are unnecessarily heavily impacted due to a serious lack of strategic planning. Together with all the concerns expressed above in my comments on proposals 1 through 13 I strongly believe that it is incumbent upon the City and the consultants who perform the Environmental Impact Statement to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:

1. *Schools*

Consideration needs to be given to the presence in every residential neighborhood of Public and Private K through 8 schools, High Schools and higher education institutions. Many schools are overcrowded. An example in my neighborhood is the Coe Elementary School. This is already seriously overcrowded and the impact of the Toll Brothers development, which has not been evaluated, on the former Seattle Children's Home site will add considerably to this situation.

2. *Community Centers, Libraries, Parks, Pools.*

Most of these public facilities are underfunded and often in need of repairs or replacement. The impact of massive new development on existing stressed public facilities must be considered.

3. *Roads and Traffic*

Queen Anne is considered to be a highly desirable neighborhood because of the quality of older housing stock, the closeness to Central Seattle, its views, etc. Yet like many older neighborhoods its roads are seriously declining at a time when the neighborhood is experiencing traffic increases. Increased development will simply exacerbate these trends.

4. *Parking*

Parking in residential neighborhoods is already being impacted by increased development of individual lots on the west side of Queen Anne. The narrow street on which I live now regularly experiences parking by individuals who do not reside on this block. This is a clear consequence of inadequate parking provision.

5. *Utility Infrastructure*

The doubling and proposed tripling of densities in single-family neighborhoods will almost certainly have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. In addition, water service and related pressure could be impacted together with sanitary sewer capacity. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must also be analyzed

6. Public Transportation

Seattle has increased bus service hours. However, due to the transit circulation challenges caused by topography, accessibility, distance to service and other concerns, I believe that any increases in density within single-family zones must be related to the availability of public transportation. This is not happening. It is imperative that answers are provided to the question regarding how and when will you increase public transportation options before you increase density?

I ask the City to protect single-family neighborhoods from being converted to the multi-family designation. If the proposed legislation passes, it is doubtful that it will be undone.

Thank you for considering these comments.

David C. Streatfield  
2409 11<sup>th</sup> Avenue West  
Seattle, WA 98119

**ADUEIS**

---

**From:** Ted and Alison Inkley <inksea@earthlink.net>  
**Sent:** Thursday, November 16, 2017 11:54 AM  
**To:** ADUEIS; O'Brien, Mike  
**Cc:** Welch, Nicolas; Pennucci, Aly; Freeman, Ketil; Burgess, Tim; Bagshaw, Sally; Gonzalez, Lorena; Harris-Talley, Kirster; Juarez, Debora; Sawant, Kshama; PRCC-Board-Communications@googlegroups.com  
**Subject:** Phinney Ridge Community Council comments concerning ADU/DADU EIS scope and alternatives  
**Attachments:** EIS scoping comments - final 11 16 17.pdf

The Phinney Ridge Community Council submits the following comments concerning the scope of the EIS for the proposed changes to ADU/DADU (aka "backyard cottage") regulations, and the alternatives to be considered in that EIS. For your convenience, the text of our comments is included in both a PDF document and in the text of this email. Feel free to contact me at this email address if you have any questions or wish to follow up.

For the Phinney Ridge Community Council

Ted Inkley  
 Vice-President

**Re: Accessory Dwelling Unit EIS—comments concerning scope and alternatives**

The Phinney Ridge Community Council submits the following comments concerning the scope of the Environmental Impact Statement for the proposed Accessory Dwelling Unit legislation, and the alternatives to be considered by the EIS.

First, we join the Queen Anne Community Council in asking that the EIS contain a third alternative in addition to "no action" and the sweeping code amendments contained in the proposed legislation. First, it is common—and useful in decision-making—for an EIS to contain three alternatives. Second, the City is likely to adopt some changes to current ADU policies. As currently proposed, the EIS presents decision-makers with the binary option of radical change or nothing. This seems to presume that the City Council will adopt the current proposal regardless of its consequences. Decision-makers and the public should instead be given the benefit of a fair range of options, and a full analysis of their consequences. Anything less will be inadequate to guide informed decision-making.

Second, we join the Queen Anne Community Council in asking that the EIS analyze the alternatives in light of concurrency issues under the State Growth Management Act. Expansion of the City's infrastructure lags far behind its rapid population growth. The proposed ADU legislation would certainly exacerbate this problem. We therefore ask that the EIS consider the alternatives' effect on schools, parks and other public facilities, roads and traffic, public transit, and utility infrastructure. The EIS also should analyze the alternatives' effect on tree cover and carbon-dioxide capture.

Following are the Phinney Ridge Community Council's suggestions concerning the elements that should be contained in a third alternative in the EIS. These suggestions are taken from our In March 2016 letter and memorandum to the City concerning the proposed ADU legislation. We have shared that correspondence with

various City officials on a number of occasions since that time. We have also asked that it be made part of the record for the environmental review of the ADU proposal. We believe that a third alternative in the EIS should outline a proposal that:

- \* **Makes changes dependent upon the circumstances of individual neighborhoods rather than imposing a "cookie-cutter" approach that fails to recognize the unique qualities and circumstances of each. For example, parking requirements should reflect each neighborhood's needs and situation. The parking situation on View Ridge, for example, is completely different than on Capitol Hill. Average lot sizes also vary wildly among neighborhoods. While a 10,000 square-foot lot may be able to accommodate three dwelling units under some circumstances, a 3,500 square foot lot certainly can't do so.**
- \* **Makes changes incrementally, so that the City can evaluate their effect before imposing them wholesale throughout the City. For example, the City might consider limiting the total number of ADU/DADU combinations in each area until the effects of the change become apparent.**
- \* **Retains the own-occupancy requirement for all ADUs. In this respect, we note that Council Member Mike O'Brien has told members of the Phinney Ridge Community Council on at least two occasions that he did not intend to effectively eliminate the owner-occupancy requirement, as the current legislation would do. We also note that we believe that owner-occupancy is perhaps the single most important element in ensuring that any changes to ADU regulations do not worsen speculative development by absentee landlords.**
- \* **Maintains the current 4,000 square-foot minimum lot size for DADUs.**
- \* **Maintains current lot-coverage and size regulations for DADUs.**
- \* **Contains meaningful limitations on the use of ADUs as short-term rentals, to ensure that new development is used as housing rather than hotel rooms.**
- \* **Contains meaningful design review and guidelines to ensure that DADUs are consistent with neighborhood character. We note that the ADU regulations in both Portland and Vancouver, B.C. recognize this issue.**

Thank you for your consideration.

For the Phinney Ridge Community Council

Alice Foggi, President

Ted Inkley, Vice-President

Irene Wall, Secretary

Terry Cook, Treasurer



**Re: Accessory Dwelling Unit EIS—comments concerning scope and alternatives**

The Phinney Ridge Community Council submits the following comments concerning the scope of the Environmental Impact Statement for the proposed Accessory Dwelling Unit legislation, and the alternates to be considered by the EIS.

First, we join the Queen Anne Community Council in asking that the EIS contain a third alternative in addition to “no action” and the sweeping code amendments contained in the proposed legislation. First, it is common--and useful in decision-making--for an EIS to contain three alternatives. Second, the City is likely to adopt some changes to current ADU policies. As currently proposed, the EIS presents decision-makers with the binary option of radical change or nothing. This seems to presume that the City Council will adopt the current proposal regardless of its consequences. Decision-makers and the public should instead be given the benefit of a fair range of options, and a full analysis of their consequences. Anything less will be inadequate to guide informed decision-making.

Second, we join the Queen Anne Community Council in asking that the EIS analyze the alternatives in light of concurrency issues under the State Growth Management Act. Expansion of the City’s infrastructure lags far behind its rapid population growth. The proposed ADU legislation would certainly exacerbate this problem. We therefore ask that the EIS consider the alternatives’ effect on schools, parks and other public facilities, roads and traffic, public transit, and utility infrastructure. The EIS also should analyze the alternatives’ effect on tree cover and carbon-dioxide capture.

Following are the Phinney Ridge Community Council’s suggestions concerning the elements that should be contained in a third alternative in the EIS. These suggestions are taken from our In March 2016 letter and memorandum to the City concerning the proposed ADU legislation. We have shared that correspondence with various City officials on a number of occasions since that time. We have also asked that it be made part of the record for the environmental review of the ADU proposal. We believe that a third alternative in the EIS should outline a proposal that:

- **Makes changes dependent upon the circumstances of individual neighborhoods rather than imposing a “cookie-cutter” approach** that fails to recognize the unique qualities and circumstances of each. For example, parking requirements should reflect each neighborhood’s needs and situation. The parking situation on View Ridge, for example, is completely different than on Capitol Hill. Average lot sizes also vary wildly among neighborhoods. While a 10,000 square-foot lot may be able to accommodate three dwelling units under some circumstances, a 3,500 square foot lot certainly can’t do so.
- **Makes changes incrementally, so that the City can evaluate their effect before imposing them wholesale throughout the City.** For example, the City might consider limiting the total number of ADU/DADU combinations in each area until the effects of the change become apparent.
- **Retains the own-occupancy requirement for all ADUs.** In this respect, we note that Council Member Mike O’Brien has told members of the Phinney Ridge Community Council on at least two occasions that he did not intend to effectively eliminate the owner-occupancy requirement, as the current legislation would do. We also note that we believe that owner-occupancy is perhaps the single most important element in ensuring that any changes to ADU regulations do not worsen speculative development by absentee landlords.
- **Maintains the current 4,000 square-foot minimum lot size for DADUs.**
- **Maintains current lot-coverage and size regulations for DADUs.**
- **Contains meaningful limitations on the use of ADUs as short-term rentals,** to ensure that new development is used as housing rather than hotel rooms.
- **Contains meaningful design review and guidelines** to ensure that DADUs are consistent with neighborhood character. We note that the ADU regulations in both Portland and Vancouver, B.C. recognize this issue.

Thank you for your consideration.

For the Phinney Ridge Community Council

Alice Poggi, President  
 Ted Inkley, Vice-President  
 Irene Wall, Secretary  
 Terry Cook, Treasurer

**ADUEIS**

---

**From:** Margaret Allen <mdallenmd@yahoo.com>  
**Sent:** Thursday, November 16, 2017 2:49 PM  
**To:** ADUEIS  
**Subject:** Comments to the ADU-EIS  
**Attachments:** ADU-EIS comments 11.16.17.docx

Please see my enclosed letter. I am a Queen Anne resident and homeowner but I was also formerly a renter of a backyard cottage, so someone with experience on both sides. I support the existing DADU/AADU ordinance and the Alternatives from the QACC, and am opposed to the changes proposed by the City Council. I hope you can take the time to read my letter. Thank you.

16 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Jennie Durkan  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

Although not a member of the Queen Anne Community Council, I whole-heartedly support all of the comments and suggestions submitted by Martin Kaplan from the Land Use Review and Planning Committee of the QACC. Their Alternatives to the City Council's proposed revisions to the existing Back Yard and AADU ordinance are based on extensive research and rational thought. Simply getting rid of all single family zoning to build apartments will not solve this city's problems. This forces families who just want a yard for their children and pets to move farther and farther out to the suburbs, making the city increasingly composed of singles and childless couples. I think most Seattleites want to preserve the diversity of this city, a diversity that should include not just only ethnic and economic diversity, but also families, children, and grandparents. I don't hear a voice for them on this Council. Keeping families in this city will require a diversity of housing options, and preserving the character of neighborhoods, not just a forced one-size-fits-all approach.

The existing DADU and AADU ordinance provides an excellent mechanism through which existing homeowners can build or remodel underutilized parts of their houses and/or garages into rental units and mother-in-law apartments that fit within the scale and community spirit of the neighborhood. The current Backyard Cottage/AADU ordinance should be maintained, or modified according to the QACC Alternatives, but steps should be taken to make obtaining permits an easier process. Right now, getting a permit is difficult (unless you are a developer) and that is the barrier to increasing the numbers of DADU/AADUs.

For lower income renters, DADU/AADUs are affordable while still offering the advantages of single family neighborhoods and connections to the city center. For example, today, on a walk around upper Queen Anne (supposedly the "high rent" district), I passed two different single family homes with cottages/AADUs with "for rent" signs outside ranging from \$1000 - \$1500/ month. In contrast, I also passed a 6 story high rise under construction, dwarfing its neighbors, and wedged into a narrow lot where a single family home had just been torn down. The prior house had been sold to the developer for over \$1.4 million, and the 8 new units are to be leased at top prices (Zillow estimates > \$2500/mo). If, under the Council's proposal, ALL single family zones can be converted to apartments, how can a middle income family ever hope to compete with a developer to buy a house? What would incentivize empty-nester homeowners to build reasonably-priced backyard cottages versus just selling out to developers? The Council's proposal benefits developers, demolishes current affordable housing, and prevents future families from ever owning homes in the city—completely the opposite of your purported goals.

Further, the Council's plan to eliminate the requirement that backyard cottages/ADUs have onsite ownership simply primes them for being taken over by large apartment management companies or for being converted to Airbnb and VRBO offerings by investors, and thus, not even available to local renters. The latter, in fact, is

already happening. The City's own data shows that over half of the existing backyard cottages are used as short term rentals which, of course, is much more lucrative. Why facilitate behavior that disadvantages our own citizens?

Finally, the Council's plans to eliminate the requirement for on-site parking is absolutely ridiculous. I currently have trouble finding parking within 5 blocks of my own house and I'm the resident here. You want to triple the number of parked cars? Very few people bicycle up and down Queen Anne hill as an alternative and this is unlikely to change. Even Council decisions can't legislate geography.

Please think this through and don't vote for the proposed changes. Instead, support the existing DADU/AADU ordinance with the QACC recommendations which should actually provide affordable housing if implemented.

Thank you,

Sincerely,

Margaret Allen

Queen Anne resident and homeowner, and previously a backyard cottage renter

**ADUEIS**

---

**From:** WilliamsNiki@aol.com  
**Sent:** Thursday, November 16, 2017 2:55 PM  
**To:** ADUEIS  
**Cc:** williamsniki@aol.com  
**Subject:** ADU EIS SCOPING COMMENTS  
**Attachments:** bjadu-eis.docx

Hello,

Here are two pages of **ADU-EIS Scoping comments due today.**

The comments are attached in the document below.

They are from Bonnie Williams/ Wallingford resident.

Thank you!

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

From: Bonnie Williams/ Wallingford homeowner Nov. 16, 2017 Re: Comments for Scoping for ADU-EIS

1) **New Alternative 3** suggested. A single family lot can have one AADU ( Attached Accessory Dwelling Unit/ Mother in Law apartment) OR one DADU ( Backyard Cottage), but not both, unless the subject lot is over 10,000 sq. feet, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overly district where the majority of lots are over 10,000 square feet and streets are as defined as able to have wider streets allowing\parking on both sides of the street.

1a) **New Alternative 3** Leave in 6 month owner occupancy requirement unchanged to avoid wide speculation and uncontrolled development.

1b) **New Alternative 3** leave lot size at current 4,000 square feet unchanged due to cramming units on small lots and reduced privacy and burden on surrounding properties. This is too drastic a proposal for 3200 square foot lots. **Note: I have lived adjacent to backyard cottages and have experienced backyard. side yard, privacy, noise and parking impacts. These are significant. I moved away from Ballard as these impacts significantly changed my living conditions and influenced a move. Some of these DADU's are being rented out without ever being permitted and should be shut down. Stricter enforcement is needed. Survey or interview people living next to the 50% of cottages used for air b and b's and/or monthly rentals and ask these neighbors about impacts. There are many!**

1c) New Alt 3 Restrict larger than 800 foot DADU's to lots of 10,000 square feet and locations only where wider streets exist with concurrent infrastructure and parking on both sides of the street. **Keep 800 square foot size restriction.** Do not increase to 1,000 square feet as impacts and opportunity for developer abuse of codes (clerestories) to bulkier buildings with greater impacts to adjacent properties will be unmanageable. Also, yards. Trees and greenspace needed for true family housing will be lost if garages do not count and other structures. Leave size of 800 square feet to all lots under 4.000 sq feet.

1d) New Alt 3 Leave roof features unchanged

1e) New Alt 3 Leave household size 8 unrelated people per lot. Do not destroy character of sf neighborhoods with unreasonable density per lot at 12 on a 3200 sq foot lot? No way!

1f) Require rental registration and inspection RRIO. No problem!! Step up identification of illegal rentals.

1h) MHA does not apply to single family zones in the creation of ADU's SF zones should not be changed or amended to allow multi family. They should not be subject to MHA upzones and other MHA conditions.

Note:Issues of concurrency are not adequately considered in changing all sf properties to triplex with 12 persons per lot. Infrastructure should be there in each neighborhood before anything this massive in density is put forward.

Bonnie Williams AADU-EIS

The city's objective should be for creating more housing opportunities more moderately that blend with existing family neighborhoods. The existing cottage and/or adu do that. The costs are high for homeowners to build and they need to charge market rate rents if it is financially feasible at all.

The assumption and misleading idea that these cottages will be cheap ways to move to high opportunity neighborhoods is just not true. 50% are air b and b's and this is more lucrative for homeowners who can get nightly rates and a quicker return on investments. Developers do have the money to exploit sf zones and build triplexes, but the city does not consider fully enough how that can destroy neighborhoods as it is doing now.

The EIS should study the impacts of real estate speculation in ADU rentals on affordable housing

The EIS should study the impacts of air banb short term rentals for adu's on affordable housing

The EIS should study the impacts of the proposals on tree canopy. Green space, play spaces and recreation, removal of yards for pets and how reduced setbacks make tree growing, fencing and maintenance more difficult

The EIS should study:

Impacts of the proposals on parking for neighborhood including residents and small businesses ( so far city plans for no parking in new development is just exacerbating problems with 1.2 cars per resident)

Impacts of proposals on sewers, sewage treatment, and water quality

Impacts of proposals on public services ( community centers, libraries, parks, pools including fire and police )

Impacts of proposals on utilities including water and electricity

Impacts of the proposals on transportation including traffic congestion, and the adequacy and availability and cost of public transit

Impacts of the proposals on schools including overcrowding and playfield space both public and private K-8, High Schools and higher education.

Impacts of heavy equipment, trucks traveling through narrow city streets, truck regulations to strengthen, downsize the trucks as related to safety of parked cars, road upgrades, repairs in neighborhoods

Study impacts of traffic congestion in each neighborhood as triplexes on each lot challenge further the Roads and traffic congestion in light of building and added density in the last two years

Thank you! Bonnie Williams

## ADUEIS

---

**From:** Greg Flood <greg.f@comcast.net>  
**Sent:** Thursday, November 16, 2017 3:38 PM  
**To:** ADUEIS; Pennucci, Aly  
**Cc:** Burgess, Tim; O'Brien, Mike; Johnson, Rob; Herbold, Lisa; Gonzalez, Lorena; Bagshaw, Sally; Harris-Talley, Kirsten  
**Subject:** Scoping Comments for ADU/DADU EIS  
**Attachments:** ADU DADU Scoping Letter 2017 1116.pdf

Hello

Attached please find my comments regarding the scoping for the EIS of the ADU/DADU proposals.

Please call if you have any questions,

Thank you,

Gregory Flood, P.E.  
4309 Densmore Ave N  
Seattle, WA 98103

greg.f@comcast.net  
(206) 632-7271

November 16, 2017

City of Seattle  
Council Central Staff  
PO Box 34025  
Seattle, WA 98124-4025

Attn: Aly Pennucci, City Council Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw  
Councilmember Kirsten Harris-Talley

Re: Scoping Comments for ADU/DADU Environmental Impact Statement

Dear Ms. Pennucci, and others:

Thank you for the opportunity to participate in the process for trying to improve access and feasibility for the construction of Accessory Dwelling Units (ADU/DADU) in the city of Seattle. This, indeed, can be a valuable source of affordable rentals and can likely be accomplished without adverse impacts to adjacent property owners, if care is taken in how the proposals are implemented.

A driving principle for me is that all projects should be required to mitigate their own adverse impacts. It has been extremely troubling to me that City Council and the (former) Mayor has, in the past, proposed changes to building standards that create significant adverse impacts to adjacent property owners, yet appear to refuse to adjust the proposals to reduce the impacts. I certainly hope that this process will be approached compassionately and thoughtfully. The probability for success, after all, will be much higher if neighbors feel empowered rather than embittered by the new policies.

I feel very strongly that maintaining the Owner Occupancy requirement will serve to help reduce speculation and price escalation from real estate investment firms. It is my opinion that by implementing less drastic changes to the ADU/DADU, the program may become quite useful WITHOUT requiring the removal of the requirement for Owner Occupancy. Further, I believe that the majority of the adverse impacts of the ADU/DADU proposals will arise from elimination of the Owner-Occupancy requirement and that there will be little benefit to affordability created by the participation of the real estate investment cartel. After all, rents for owner-occupied ADU and DADU are typically lower than market and are less likely to change at the same rate as market-rate properties built by developers.

For this reason, I suggest that the City consider implementing the other changes, but only perform a pilot study in one portion of Seattle where Owner Occupancy is waived. In this way, the City will be allowed to: 1) more accurately assess the real world affect of the other proposed changes without altering Owner Occupancy; and 2) more accurately assess the real world adverse impacts to housing prices that will certainly be incentivized through increased speculation due to the deep pockets of real estate investment firms.

There are several additional items that are not included in your Alternatives Summary that I feel would be beneficial to the ADU/DADU program and should be included in the scope of your analysis:

1. Consider the potential benefit to homeowner project costs of the City creating a library of stock plans for DADUs. Significant cost savings to the home owner could be realized if a large portion of the design costs for structural, architectural, electrical, and mechanical engineering work was included and only needed to be modified slightly to adapt the plans for the specific site.
2. Consider working with King County to reduce the very high cost for sewer connection for DADU construction. It makes no sense for an ADU to not trigger any fee, but for a DADU of similar size and occupancy to trigger a fee of \$15,000 to \$20,000.
3. Consider creating a City financial resource center to assist homeowners in locating and securing financing for construction of ADU/DADUs.
4. The City has only included one alternative in the analysis. Convention usually warrants that at least two alternatives be provided for comparison. Please consider creating an additional alternative based on the other comments.
5. I understand that the proposals for ADU/DADU will apply to all single-family parcels throughout the entire City. However, the MHA proposals for the urban villages will essentially eliminate all of the single-family parcels in those areas. It is important to make clear that the ADU/DADU standards discussed here will be applied in the same manner for existing homes located in the upzoned areas of the urban villages as well.

I respectfully submit the following observations and scoping suggestions (numbers used relate to the City's Summary of Alternatives posted on the City website):

1. Number of ADU/DADU on a lot: This appears to be of little benefit for a homeowner and would mainly be beneficial for developers. As noted above, I feel that the adverse impacts of opening up all of the single-family property in Seattle to increased speculation by the deep pockets of real estate investment firms is not prudent and will only make housing less affordable. Please analyze how many homeowners would wish to build both types of units. Also please assess the adverse impacts due to increased speculation created by allowing development interests to participate. I am not in favor of this proposal as I do not feel that it is beneficial to homeowners.
2. Parking: The parking proposal is affected by several other proposals, including allowing both ADU and DADU on a single lot, and allowing a greater number of unrelated people to live on a single parcel. As noted herein, I am not in favor of either of these proposals. I do support, however, a "no net loss" of on-site parking, i.e. if an off-street parking space exists before addition of the ADU/DADU, then a space should

exist when the project is complete. Please estimate the number of units that would be built under a “no net loss” policy versus waiving the requirement completely.

3. **Owner Occupancy:** I feel very strongly that a primary benefit of ADU/DADU is that it can assist an existing homeowner by providing additional rent to help pay taxes, mortgage, and utility expenses, or to provide space for family members to live independently and affordably. I also feel that opening up all of the single-family property in Seattle to increased speculation by real estate investment firms will adversely affect the price of housing. I would support the City performing a pilot study in one area of the city, after other changes have been implemented, in order to assess the adverse impacts to housing prices and whether any actual additional affordable housing is created from waiving owner occupancy.
4. **Minimum Lot Size:** I do not support a change to minimum lot size, which used to be 5000 sq ft and has already been reduced to 4000 sq ft without public process. However, allowing only an ADU (not DADU) on lots as small as 3200 sq ft certainly seems reasonable as long as the existing building envelope is not increased. Please explore how many housing units would be created if only ADUs are allowed on small lots compared to allowing both. I suspect there is not much difference.
5. **Maximum Square Footage:** I prefer that existing size limits be retained and that the area of garage and storage areas be included in the calculation. The typical lot size of 4000 sq ft is already pretty maxed-out with a DADU built under existing standards. Also, the impact of the larger area on lot coverage depends on whether the proposed DADU is two-story due to a much smaller footprint. Please explore the impact of possibly allowing Alternative 2 only for parcels larger than 7000 sq ft in area.
6. **Maximum Height:** The impact of height depends, in part, on how close the DADU is to the existing property line and the adjacent homes. I understand the goal of allowing a two-story DADU, but the current height standard is sufficient for smaller two-story DADUs on smaller parcels. The slope of the roof and width of the structure drive the total height of the unit, with a greater height from the top plate to the ridge only occurring for wider DADUs. Therefore consider only allowing greater height for parcels larger than 7000 sq ft in area.
7. **Lot Coverage Limit:** The City is not proposing a change to this standard, however reducing the lot size to 3200 sq ft would allow a project to cover 46-percent of the lot. This would be further impacted under the proposal to allow 1000 sq ft for DADUs. I am not in favor of the increased floor area. This proposal is also dependant on the proposal to increase the allowed rear lot coverage. Consider only allowing a flat 35-percent lot coverage for all parcels, no matter the size.
8. **Rear Yard Coverage:** I do not support increasing the allowable lot coverage in the rear yard due to adverse impacts to open space, privacy, trees, and just allowing a place for families to play. Livability is more important as density increases. This is particularly important if larger floor areas are allowed for DADUs, as well as the other changes proposing to increase the size of DADUs. Consider setting a fixed minimum square footage of open space, rather than a percent of lot area.

9. Location of Entries: Location of entries at least 10 feet away from adjacent property lines appears acceptable as long as there are no exceptions and the proposal is enforced, which has been problem in the past.
10. Roof Features: Dormers appear acceptable as long as they face toward the existing home or toward the public right-of-way, rather than toward adjacent homes and yards, in order to preserve a modicum of privacy.
11. Household Size: I do not support allowing up to 12 unrelated people per parcel due to the increased likelihood of increased vehicle ownership and traffic, especially when there will be zero or only one on-site parking space provided. The potential adverse impacts of additional traffic, activity, and parking in the single-family zone are not offset by any apparent benefit to increasing the occupancy. How often have folks wished to have more than 8 unrelated people living on a single parcel?
12. MHA Requirements: The ADU/DADU standards should also apply to single-family homes located within the boundary of the urban villages, even though the single-family standards is being proposed to be eliminated in the urban villages.
13. Rental Registration: No change proposed, however it is important that this standard be enforced, which has been a problem in the past.

Please consider the following comments regarding the potential impacts of the ADU/DADU proposals:

1. In many cases, the combination of multiple changes proposed will result in much larger ADU/DADU projects. The City only proposed a single Alternative, which is not typical. Compatibility with adjacent property in the single-family zone will depend on the combination that is ultimately approved. I am NOT in favor of waiving the Owner-Occupancy requirement because I believe that the majority of adverse impacts to the single-family zone would likely arise from this change. Consider performing a pilot study after the other changes have been made before considering relaxing the requirement that the property be owner-occupied.
2. Potential for elimination of existing housing will be much reduced if the owner-occupancy requirement is retained.
3. The discussion above regarding the proposals to increase lot coverage, rear yard coverage, floor area, roof heights, and minimum lot size will all likely have greater adverse impacts on trees, open space, yards, and recreation area and should be considered when reviewing the proposed changes.
4. Development concerns are substantially reduced if the owner-occupancy requirement is retained. The potential for true improvement in affordability is also increased if the homeowner can supplement the increased cost of mortgage, property taxes, and utility expenses with rent from a tenant. The City benefits from additional affordable housing because homeowner landlords typically have lower rents and are less likely to increase rents to whatever the market will bear. Developer-owned property is less likely to be affordable as the cost for new construction increases the cost that needs to be recovered to serve investors, which adversely affects rents, and the investor-owned housing will be priced at market rates as quickly as possible.

5. In order to avoid adverse impacts to visible character, ADU/DADU should be required to be subordinate to the main house and utilize similar design elements and materials to create a similar style as the main house.
6. It is very important to consider the impacts of shading, privacy, scale and compatibility of proposed ADU/DADU. Consider perhaps requiring a shadow analysis, especially where solar collectors may be present at adjacent homes. Windows for DADUs should be encouraged to face the main house or public right-of-way, rather than face nearby adjacent homes and yards in order to preserve privacy. The scale of the DADU should be subordinate to the main house, with similar style and materials.
7. Impacts to street parking will be affected greatly by the number of unrelated people allowed to live on a parcel, as it is more likely that there will be more cars. For this reason, retain the current maximum of 8 unrelated persons living on a single parcel.
8. Potential impacts due to fire from DADU close to the existing property line and structures on adjacent property need to be considered. Work with King County to reduce the connection fee associated with a DADU. It makes no sense for an ADU to not have a sewer fee, but a DADU of similar size and occupancy to be charged \$15,000 to \$20,000. Storm water runoff should be required to be handled on-site if there is any change to the lot coverage of a DADU. A project built on the same footprint as an existing garage, without and increase in size, would be allowed to continue to handle the runoff in the same manner as existing.

Thank you for your consideration of these comments. I look forward to your response.

Sincerely,

Gregory Flood, P.E.  
4309 Densmore Ave N  
Seattle, WA 98103  
[Greg.f@comcast.net](mailto:Greg.f@comcast.net)  
(206) 632-7271

**ADUEIS**

---

**From:** JF <jefrisch77@centurylink.net>  
**Sent:** Thursday, November 16, 2017 3:42 PM  
**To:** ADUEIS  
**Subject:** Comments on EIS Scoping for Seattle Single Family Upzone.docx  
**Attachments:** Comments on EIS Scoping for Seattle Single Family Upzone.docx

**Attached are my comments on the EIS scoping for the proposal to basically abolish single-family housing in Seattle.**

November 16, 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Tim Burgess  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

All:

Please accept this letter as my family's Scoping Comments delivered as per the extended deadline.

A few comments first about the information sessions. It was very disturbing to learn from one of the City of Seattle staff at the Fremont meeting that basically few efforts were made to notify the general public about the information sessions related to the EIS scoping phase. Thankfully my neighbor told me. After much searching I did find information on the City website. Why wasn't information in the Seattle Times, on the radio, or as is more typical, on a post card sent to homeowners and interested parties? Rather, the staff person admitted that they only put a public notice in the Seattle Daily Journal of Commerce. I don't think too many people other than developers probably read that publication...but then that is probably the point. Homeowners have been generally excluded since the inception of the HALA effort and are continuing to be excluded and discounted. There should have been a much greater effort to notify homeowners. Moreover, there should have been more meetings at more locations. It is ironic that one rationale for ceasing the funding for community councils was that they were considered too exclusive by the former mayor because many were held at night and yet the only two information meetings for EIS scoping were held in the evening during rush hour.

Regarding the EIS scoping, it is highly unusual to only evaluate only two alternatives—the proposed change or no action. Allowing an ADU and DADU on every lot (3200 sq. ft. or larger) is a huge change that will impact every single neighborhood. It is unconscionable to suggest that this change be allowed in every neighborhood when the current infrastructure of many neighborhoods—particularly the oldest like Queen Anne and others--cannot support such growth without major infrastructure improvements including school capacity; increased capacity of water, sewer, and other utilities; better public transportation; among other things. More importantly, there will be significant adverse ecological impacts from the reduced tree canopy and increased surface runoff from such a plan (that will contribute to climate change and further deteriorate our salmon runs). According to planning staff for the City of Seattle, potential capacity to meet Seattle housing goals already exists in land zoned multi-family. There is currently no need make such a sweeping change to Seattle's single-family neighborhoods. It makes much more sense to have denser housing—that is, units in multi-story buildings--along major public transportation routes. The unique neighborhoods, once destroyed by developers, can never be recreated. And the reality is that families wanting to purchase a single-home in Seattle will never be able to compete in a bidding war with the developers and speculators. Seattle's home will eventually all be rentals.

There needs to be additional alternatives reviewed in order for an appropriate, data-driven (not ideologically driven), thoughtful, and balanced response to the housing problems in Seattle. Everyone has a stake in doing this right, including current and future homeowners. I strongly agree with all of comments submitted by Marty Kaplan, on November 12, 2017 on behalf of the Queen Anne Community Council (QACC).

To that end, there should be an evaluation of additional alternatives which include:

1. Number of ADUs allowed on a single-family lot:
  - Alternative 3: A single-family lot can have one AADU (Attached Accessory Dwelling Unit/Mother-in-Law apartment) OR one DADU (Backyard Cottage) but not both, unless the subject lot is over 10,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and is located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets are as defined as street-widths that can accommodate parking on both sides with two lanes of travel in-between.
2. Parking:
  - Alternative 3: One off-street parking space is required for an AADU and DADU unless the lot is located in a specific overlay district defined by lots greater than 8,000 sq ft, cannot ever be subdivided through a deed restriction, has provable newer infrastructure to handle increased density, and street-widths that can accommodate parking on both sides with two lanes of travel in-between.
3. Owner Occupancy:
  - Alternative 3: Leave owner-occupancy requirement unchanged.
4. Minimum Lot Size for DADU:
  - Alternative 3: Leave minimum lot size requirement unchanged.
5. Maximum square footage:
  - Alternative 3: Many Seattle neighborhoods are characterized by large lots and wide streets. These newer neighborhoods also may have much newer utility infrastructure. Consider allowing larger DADU's on properties that are greater than 10,000 sq ft., cannot ever be subdivided through a deed restriction, have provable newer infrastructure to handle increased density, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets as described above.
6. Maximum Height:
  - Alternative 3: Consider allowing minimum height increases on properties greater than 10,000 sq ft. and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 10,000 sq ft and streets as described above.
7. Lot coverage:
  - Alternative 3: Leave minimum lot coverage requirement unchanged.
8. Rear Yard Coverage Limit:
  - Alternative 3: Leave minimum lot coverage and rear yard requirements unchanged.
9. Location of Entries:
  - Alternative 3: DADU entrances can be on any façade, provided they are 10 feet from the lot line if located on the façades facing nearest side or rear lot line (unless abutting right-of-way) on lots greater than 8,000 sq ft. Consider revising the entry limitation to lots greater than 8000 sq ft, in neighborhoods characterized by large lots and wide

streets, and with provable newer infrastructure to handle increased density, cannot ever be subdivided, and are located in a specific overlay district where the majority of lots are over 8,000 sq ft and streets are as described above.

10. Roof Features:

- Alternative 3: Leave Roof Features requirement unchanged.

11. Household Size:

- Alternative 3: Leave Household Size requirement unchanged.

12. MHA Requirements:

- Alternative 3: Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single Family zones. Single Family Zones and said designation shall not be changed or amended to allow for multi-family development and therefore the imposition of the MHA up-zones and other MHA conditions.

13. Rental Registration and Inspection Ordinance

- Alternative 3: Single Family Zones and said designation shall not be changed or amended to allow for multi-family development.

14. Issues of Concurrency

- Concerns: The policy and code changes in your proposal would triple the allowable number of residences in all single-family zones and increase the allowable number of unrelated persons living on a single property from 8 to 12. Inviting new growth and density should involve a concurrent investment in infrastructure before said growth occurs. This has not been accomplished in Seattle and as a result, citizens are unnecessarily heavily impacted due to a lack of strategic planning and performance in respect for those who reside within our City limits. It is incumbent upon the city and your consultants to thoroughly analyze every significant environmental impact associated with increasing densities including but not limited to the following:
  - **Schools:** Public and private K-8, high schools, and higher education. Many schools are already overcrowded and portable classrooms have been added and playgrounds have been removed;
  - **Community Centers, Libraries, Parks, Pools, and Public Amenities:** Most existing neighborhoods are underserved by public amenities and services that have gone underfunded and maintained, have become obsolete and are in need of replacement, are suffering from deferred maintenance or are too small to adequately serve existing neighborhood populations. How will doubling or tripling the density relate to making huge and necessary billion dollar investments into serving our neighborhood public services throughout Seattle?
  - **Roads and Traffic:** Roadway conditions throughout the city and within most neighborhoods are in need of significant maintenance, repair and upgrades. Couple this grid deterioration with a dramatic increase in traffic, exceeding capacity within and through many neighborhoods such Mercer Street, West Seattle, Rainier and many others within neighborhoods and neighborhood business districts, and on connecting arterials, freeway off and onramps, and major arterials and freeways as well;
  - **Parking:** Street R.O.W. parking, public and private garages, and adjacent Urban Village parking if there are no parking requirements associated with developments within urban villages. We have seen a significant growth of populations with car ownership within urban villages who do not choose to pay for parking within multi-family buildings and instead park on nearby streets for free within adjacent single-family neighborhoods;

- **Utility Infrastructure:** The doubling and proposed tripling of densities in single-family neighborhoods will likely have a profound environmental impact on many services, reliability, and performance. The EIS must study the impacts associated with adding a significant amount of impermeable surface area greatly impacting the overburdened storm water drainage capacity within many neighborhoods. Stormwater runoff is considered to be extremely harmful to salmon and other aquatic wildlife. In addition, water service and related pressure can be impacted along with sanitary sewer capacity as well. Electric service, telephone, broadband capacity together with the tripling of waste generation and pick-up must be analyzed;
- **Public Transportation:** Any increases in density within single-family zones must be commensurate with public transportation availability. We know that this is not the case now, how will you increase public transportation options before you increase density?

Sincerely,

Janet Frisch  
Mail.jgf@centurylink.net

**ADUEIS**

---

**From:** Jeff Laufle <lauflej@comcast.net>  
**Sent:** Thursday, November 16, 2017 4:39 PM  
**To:** ADUEIS  
**Subject:** DADU EIS scoping input  
**Attachments:** Thornton Creek Alliance scoping input for DADU EIS 20171116.pdf

Ms. Pennucci,

Here are comments from the Thornton Creek Alliance for the scoping phase of the DADU EIS being conducted by the City of Seattle.

If you have any questions, please feel free to contact me, or Ruth Williams (copied here).

Jeff Laufle  
President, Thornton Creek Alliance

**Thornton Creek Alliance**  
**Post Office Box 25690**  
**Seattle, Washington 98165-1190**



Ms. Aly Pennucci  
Seattle City Council Central Staff  
PO Box 34025  
Seattle, WA 98124-4025

November 16, 2017

Dear Ms. Pennucci:

The Thornton Creek Alliance (TCA) is a volunteer nonprofit organization of 140 members concerned with the health of the Thornton Creek watershed. We are writing with considerations for the Accessory Dwelling Units Environmental Impact Statement scoping process.

In general, we hope that in the process of encouraging greater density and housing options the City of Seattle will protect the ecosystems, greenspace and tree canopy we have worked hard to preserve and enhance. As you know, these elements contribute to the well-being and happiness of humans as well as wildlife. Greenspace and trees are also vital to livability and mitigating the effects of climate change. Thornton Creek is a defining feature of northeast Seattle, and a historic salmon-bearing stream requiring improved water quality and buffer zones that support habitat.

The EIS for the Accessory Dwelling Units proposal in Seattle should address the following:

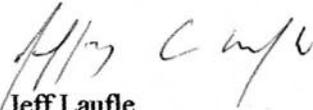
- For any alternative, analyze as quantitatively as possible the effects on tree canopy, green space, heat island effect, environmentally critical areas, and stormwater and stormwater management (including water quality and flood risk reduction). Specifics include but are not limited to:
  - Quantify the impacts of additional impervious surface combined with lost eco-services (i. e., removal of trees, lower-story natural filtration, etc.).
  - Evaluate the effect of urban heat islands when the amount of green space is significantly reduced on over 50% of the City's existing land area. Urban heat island effect on wildlife should be quantified in a similar manner to Seattle's protection of its waterfront and its salmon populations. The proposed maximum area of 1,000 square feet of ADU or DADU is the same as what is being provided in three-story rowhouses in lowrise zones. The spaces between dwellings of this density are paved and not capable of absorbing heat generated in dense areas.
- The preferred alternative should minimize negative impacts on those things, including reduction in heat island effect if possible, and it should maximize incentives for property owners and builders to take environmentally-sound actions. Some specifics that should be considered in a preferred alternative:
  - Keep the lot size for DADUs larger rather than smaller; they should be at least 5,000 square feet for all lots except possibly those on a corner.
  - Please do not increase the allowed backyard coverage from 40% to 60% as is being considered.
  - Keep DADUs limited to an 800-square-foot footprint, but encourage builders to build up an extra story rather than growing the footprint or adding a DADU. This will save room for a larger yard and save money on utilities.

- Keep strict limits on lot coverage and impervious surfaces deriving from DADUs.
- Keep a goal of enhancing the tree canopy. (Seventy-two percent of Seattle's trees are in SF zones, and a tree needs an area of about 30' by 30' to grow to maturity.)
- Define how green infrastructure will be preserved and/or replaced.
- Take care that shadows from increased dwelling heights don't interfere with neighboring solar energy generation.
- Have clear plans for preventing spills into waterways during construction, and verify contracting companies are trained in avoiding dumping into grates that drain into the creeks.

While this is outside the scoping realm for this EIS, we would suggest that green infrastructure, including green factor, tree planting, etc., should be required to be included in property documents (right along with border lines, easements, and environmental assessments), so that when a property sale takes place the buyers will be well informed of the requirements. Today, when a Seattle property changes hands, new owners typically don't know what requirements were met and must be maintained.

Thank you for your consideration. We look forward to working with you as this process moves forward.

Sincerely,



Jeff Laufle  
President

**THORNTON CREEK ALLIANCE (TCA)**, founded in 1993, is an all-volunteer, grassroots, nonprofit organization of over 100 members from Shoreline and Seattle dedicated to preserving and restoring an ecological balance throughout the Thornton Creek watershed. Our goal is to benefit the watershed by encouraging individuals, neighborhoods, schools, groups, businesses, agencies, and government to work together in addressing the environmental restoration of the creek system including: water quality, stabilization of water flow, flood prevention, and habitat improvement through education, collaboration, and community involvement.

[www.thornton-creek-alliance.org](http://www.thornton-creek-alliance.org)  
[www.facebook.com/Thornton.Creek.Alliance](https://www.facebook.com/Thornton.Creek.Alliance)

**ADUEIS**

---

**From:** Margaret Allen <mdallenmd@yahoo.com>  
**Sent:** Thursday, November 16, 2017 4:43 PM  
**To:** ADUEIS  
**Subject:** Comments to the ADU-EIS with photos  
**Attachments:** ADU-EIS comments 11.16.17.docx; Queen Anne--new building vs adjacent house.jpeg; Queen Anne--new building vs neighborhood.jpeg

Please see my enclosed letter (sent previously), but this time with enclosed photos. I am a Queen Anne resident and homeowner but I was also formerly a renter of a backyard cottage, so someone with experience on both sides. I support the existing DADU/AADU ordinance and the Alternatives from the QACC, but am opposed to the changes proposed by the City Council. I hope you can take the time to read my letter. Thank you.

The enclosed photos show a new apartment/condo being built on Queen Anne, illustrating how this building does not fit in with a single family neighborhood. With the City Council's proposed changes, we can expect to see these juxtapositions happening everywhere in the city. I suspect the homeowners next door will sell and leave, effectively being forced out. Does the new building look like affordable housing? Of course not. The affordable housing has been replaced by multimillion dollar apartments or condos that the homeowners themselves can't afford. The City Council's proposed changes foster for-profit developers and investors, not homeowners building affordable DADU/AADUs which was the intent of the original DADU/AADU ordinance.

16 November 2017

Aly Pennucci, Council Central Staff  
Nick Walsh, Planner OCPD  
Ketil Freeman, Council Central Staff  
Mayor Jennie Durkan  
Councilmember Mike O'Brien  
Councilmember Rob Johnson  
Councilmember Lisa Herbold  
Councilmember Lorena Gonzales  
Councilmember Sally Bagshaw

Re: Scoping Comments pertaining to the ADU-EIS

Dear Aly, Nick, et al:

Although not a member of the Queen Anne Community Council, I whole-heartedly support all of the comments and suggestions submitted by Martin Kaplan from the Land Use Review and Planning Committee of the QACC. Their Alternatives to the City Council's proposed revisions to the existing Back Yard and AADU ordinance are based on extensive research and rational thought. Simply getting rid of all single family zoning to build apartments will not solve this city's problems. This forces families who just want a yard for their children and pets to move farther and farther out to the suburbs, making the city increasingly composed of singles and childless couples. I think most Seattleites want to preserve the diversity of this city, a diversity that should include not just only ethnic and economic diversity, but also families, children, and grandparents. I don't hear a voice for them on this Council. Keeping families in this city will require a diversity of housing options, and preserving the character of neighborhoods, not just a forced one-size-fits-all approach.

The existing DADU and AADU ordinance provides an excellent mechanism through which existing homeowners can build or remodel underutilized parts of their houses and/or garages into rental units and mother-in-law apartments that fit within the scale and community spirit of the neighborhood. The current Backyard Cottage/AADU ordinance should be maintained, or modified according to the QACC Alternatives, but steps should be taken to make obtaining permits an easier process. Right now, getting a permit is difficult (unless you are a developer) and that is the barrier to increasing the numbers of DADU/AADUs.

For lower income renters, DADU/AADUs are affordable while still offering the advantages of single family neighborhoods and connections to the city center. For example, today, on a walk around upper Queen Anne (supposedly the "high rent" district), I passed two different single family homes with cottages/AADUs with "for rent" signs outside ranging from \$1000 - \$1500/ month. In contrast, I also passed a 6 story high rise under construction, dwarfing its neighbors, and wedged into a narrow lot where a single family home had just been torn down. The prior house had been sold to the developer for over \$1.4 million, and the 8 new units are to be leased at top prices (Zillow estimates > \$2500/mo). If, under the Council's proposal, ALL single family zones can be converted to apartments, how can a middle income family ever hope to compete with a developer to buy a house? What would incentivize empty-nester homeowners to build reasonably-priced backyard cottages versus just selling out to developers? The Council's proposal benefits developers, demolishes current affordable housing, and prevents future families from ever owning homes in the city—completely the opposite of your purported goals.

Further, the Council's plan to eliminate the requirement that backyard cottages/ADUs have onsite ownership simply primes them for being taken over by large apartment management companies or for being converted to Airbnb and VRBO offerings by investors, and thus, not even available to local renters. The latter, in fact, is

already happening. The City's own data shows that over half of the existing backyard cottages are used as short term rentals which, of course, is much more lucrative. Why facilitate behavior that disadvantages our own citizens?

Finally, the Council's plans to eliminate the requirement for on-site parking is absolutely ridiculous. I currently have trouble finding parking within 5 blocks of my own house and I'm the resident here. You want to triple the number of parked cars? Very few people bicycle up and down Queen Anne hill as an alternative and this is unlikely to change. Even Council decisions can't legislate geography.

Please think this through and don't vote for the proposed changes. Instead, support the existing DADU/AADU ordinance with the QACC recommendations which should actually provide affordable housing if implemented.

Thank you,

Sincerely,

Margaret Allen

Queen Anne resident and homeowner, and previously a backyard cottage renter





**ADUEIS**

---

**From:** Rebecca Deehr <rebecca.deehr@gmail.com>  
**Sent:** Thursday, November 16, 2017 5:12 PM  
**To:** ADUEIS  
**Subject:** Sierra Club scoping comments  
**Attachments:** ADU EIS Scoping Sierra Club.pdf

Hello Ms. Penucci,  
I've attached Sierra Club's Comments on Accessory Dwelling Unit EIS Scoping.

Thanks so much,

Rebecca Monteleone  
Chair, Sierra Club Seattle Group



**SIERRA  
CLUB**



*180 Nickerson St., suite 202  
Seattle, WA 98109  
(206) 378-0114*

16 November 2017

City of Seattle  
Aly Pennucci,  
[ADUEIS@seattle.gov](mailto:ADUEIS@seattle.gov)  
P.O. Box 34025  
Seattle, WA 98124

Subject: Sierra Club Comments on Accessory Dwelling Units Scoping

Dear Ms. Pennucci:

Sierra Club welcomes this opportunity to comment on the accessory dwelling units (ADUs) Environmental Impact Statement (EIS) scoping process. As the oldest and largest grassroots environmental advocacy organization in the country with a Washington Chapter membership of 34,000, including about 9,000 in Seattle, the Sierra Club takes an active interest in urban land use policy and zoning for its effect on environmental quality, and especially impacts to the climate.

Seattle is facing an historic housing shortage, resulting in escalating rents and dwindling opportunity for home ownership among the middle class. The large proportion of Seattle land that is zoned for detached, single-family homes is worsening this shortage and corresponding crisis of affordability. By easing the requirements for, while still appropriately regulating the development and use of, ADUs, (both attached and detached), the city can help to increase the quantity and diversity of housing throughout Seattle while helping to reduce urban sprawl, which we believe can have a net positive environmental impact.

## Environmental Impact Statement Topics

The EIS should consider changes to ADU requirements and corresponding zoning in their historic context, where neighborhoods were downzoned in the 1970s and 1980s to only allow detached housing types and thus effectively allow economic redlining. This assessment should examine how the changes in ADU requirements

and zoning will affect who can afford to reside in which locations, by estimating what income levels and demographics that cannot afford single family zones presently would be able to afford ADU housing.

An increased supply of housing that creates more compact neighborhoods with service, employment, and cultural destinations closer to residents will decrease the climate footprint of Seattle by enabling more trips to occur by walking, bicycling, and riding transit instead of perpetuating a drive-everywhere-to-everything paradigm. Affordable housing in dense, walkable communities reduces environmental impacts through more efficient energy use in buildings and for transportation. Environmental sustainability requires more housing units and more affordable housing options in a vibrant urban setting such as Seattle neighborhoods.

The city should add a third option to the EIS: Apply Residential Small Lot (RSL) zoning to all of Seattle's single-family zones. Evaluation of this additional action alternative will help to understand the impact of small footprint affordable housing throughout the city. RSL returns Seattle to its historical roots in multi-unit and small lot housing before exclusionary zoning was implemented in the 1970's and 1980's.

## Scope of Analysis

The proposed scope of the EIS too often looks at only negative impacts in its assessment of ADUs. Instead, consider factors that compare the addition of ADUs in existing urban neighborhoods—relative to alternative development patterns that add housing units at the edge of existing developed areas where transportation and environmental effects are magnified due to sprawling distances, conversion of greenfield sites, and demand for extensions of infrastructure.

The environmental footprint of additional housing is reduced with greater density. The EIS should consider energy savings from shared wall or closely spaced construction relative to stand-alone building development patterns.

Consider structuring policies to offer incentives for desirable outcomes such as adding additional housing units that can be affordable to a larger portion of the population. For example, allow both attached and detached ADUs on the same property for smaller lots if the owner resides on the property for one year after ADU completion. Increased diversity and affordability of housing types should

both be framed as positive attributes when evaluating ADU standards and approval processes.

The scope of this EIS should include social cohesion of this in-fill style of development.

- Aging-positive housing options for the elderly; “age in place”;
- Improved security from more “eyes on the street” attained via increased residential density.

## Additional Policy Considerations

The City should consider strategies for lessening vehicle ownership in ADU neighborhoods.

- Implement bus and bike incentives for ADU residents; prioritize transit service in ADU-rich neighborhoods

The City should also consider policies that will increase the affordability and quantity of additional ADUs, such as the following:

- Reduce or waive the permitting fees for ADUs for five years to incentivize their construction provided the units are rented full time for a period of at least 1 year (not rented as vacation units, Air BnB or similar).
- Reduce the permitting requirements for ADUs. Instead of being subject to the full permitting process, ADUs that meet a defined set of characteristics should require only a Subject To Field Inspection permit plus a final habitability review.
- Implement a process whereby homeowners can request departures from the design guidelines during permitting, as this would potentially open up a much larger number of parcels to ADU construction.
- Reduce or rebate the cost of sewer hookups for ADUs. This incentive might be structured to rebate a portion of the sewer fee each year provided the unit is rented at an affordable price point.
- Reduce property taxes on the increased valuation of property with an ADU that is rented full time (no vacation rentals) for a sum below the median rent.
- Allow flexible increases in height and reduced setback requirements on properties that are adjacent to non-single family zones in the current code (LR, NC, etc.).
- Do not count structures that are water permeable towards lot coverage limits, such as decks higher than 18 inches above the ground.
- Do not require owner occupancy for properties with ADUs.

The City should also consider policies that will ensure the affordability and use of ADU's by low-income renters.

We look forward to continuing to work with the city on its efforts to increase the supply of housing throughout all neighborhoods. Our efforts to mitigate climate change and improve environmental outcomes by helping to prevent urban sprawl have a strong link with the need for more housing options in dense urban areas for which Seattle must lead. The Sierra Club will work to achieve a reduced climate footprint via more infill housing, including easier implementation of ADUs.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Monteleone". The signature is fluid and cursive, with a long horizontal flourish at the end.

Rebecca Monteleone  
Chair, Sierra Club Seattle Group

**ADUEIS**

**From:** urbanmagnolia@pacificwest.com  
**Sent:** Thursday, November 16, 2017 5:16 PM  
**To:** Pennucci, Aly; ADUEIS; Welch, Nicolas  
**Cc:** PRC; Clerk; bscg\_katzenberger@outlook.com; sabrosio@comcast.net; ediebirk@gmail.com; carriefrankenburg@gmail.com; chuckaross@gmail.com; BetsyLRoss@gmail.com; sarahconeill@gmail.com; dihong.shao@dhsengineers.com; sdeforest@foxrothschild.com; llsnider2000@yahoo.com; Kim@Kim-Mulligan.com; mblums@gmail.com; judi@writeguru.com; astanko@comcast.net; carldahlman1@comcast.net; brgovmail@rulifson.com; patti.loesche@gmail.com; O'Brien, Mike; dmoehringconsultant.com; Gonzalez, Lorena; Bagshaw, Sally; Johnson, Rob; Herbold, Lisa; chriskirkllc.com; tobecooked@earthlink.net; Judi Gibbs; Alice Poggi; Baker J Katzenberger; bscg.juliafield@gmail.com; Baker John M; Deborah Alt; Davidya Kasperzyk; Sharon LeVine; RICHARD ELLISON; DOT\_SeattleTrees  
**Subject:** Petition to add scope to the ADU EIS  
**Attachments:** ADU\_MagnoliaLUC\_Petition\_2017Nov16\_City.pdf

**Dear Seattle Authorities and Planning, Land Use & Zoning Committee Council Members,**

Per public notice, attached is the written and signed appeal from eighty-seven (87) Seattle residents requesting a specific expansion to the scope of the **Accessory Dwelling Unit Environmental Impact Study** as indicated therein. The city's proposed **Alternative #2** is expected to have a significant impact of the city's environment. This petition outlines a request for examining an additional alternative and additional assessment criteria to be applied to all Alternatives. We believe that the herein **Alternative #3** will accommodate ongoing ADU's within Seattle while reducing negative impacts to the environment, natural habitats, neighborhoods, livability, personal empowerment, and social equity.

Do let me know if you have any questions.  
 Thank you!

**David Moehring AIA NCARB**  
 3444-B 23rd Ave West  
 Seattle, Washington 98199  
 Chairperson, MCC Land Use Committee



**Land Use Committee**  
 of the Magnolia Community Council

Magnolia Community Council  
 P.O. Box 99564  
 Seattle, WA 98139-0564

**Note: The petition has been endorsed by those who have signed it. No other endorsements have been or should be implied.**

**Sent:** Tuesday, November 07, 2017 at 11:44 AM  
**From:** "Pennucci, Aly" <Aly.Pennucci@seattle.gov>  
**To:** "David Moehring" <dmoehring@consultant.com>  
**Cc:** "Welch, Nicolas" <Nicolas.Welch@seattle.gov>  
**Subject:** RE: Petition to

## **Petition to Seattle EIS Scoping for Accessory Dwelling Units (ADU and DADU) within Single-Family Residential Zones**



November 15, 2017

Most every Seattle resident will support a thorough Environmental Impact Study (EIS) process that promotes livability, affordability and equity. However, the eight-seven (87) Undersigned Seattle residents do not support the limited assessment scope of the current Accessory Dwelling Unit (ADU) EIS. Councilperson O'Brien's (hereafter, the "City") proposed Alternative #2 seeks to modify current rules and policies that have been previously established for Accessory Dwelling Units (ADU). In fact, the Undersigned of this petition find the City's alternative parameters are contrary to the goal of "livable communities", diverse affordable housing options, and the consequential reduction of Seattle's unprotected heritage and exceptional trees and 'canopy cover'. We have outlined herein a better Alternative to conduct the Study (hereafter, "Alternative #3).

The undersigned Seattle residents **do not support** Alternative #2 proposed for Accessory Dwelling Units (ADU). Therefore, this petition calls to broaden the scope of the Environmental Impact Study (EIS) regarding the City's proposed incentives for Accessory Dwelling Units (ADU). The EIS shall include the additional environmental impact parameters for all Alternatives being considered, including:

- ✓ *Establishing predetermined evaluation criteria and timeline*
  - ✓ *Measuring the incremental impacts to Seattle's designated Tree Canopy Cover.*
  - ✓ *Identifying the demand for additional public park space in residential areas.*
  - ✓ *Identifying viability of existing homeowner ADU financing options incentives.*
  - ✓ *Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.*
  - ✓ *Examine Alternative Number 3 to provide a broader range of alternatives to minimize the impact to the environment.*
- **Petition Item 1:** A mandatory evaluation period 2 and 4 years after implementation of any modifications to the ADU land use codes, rules and policies to ensure any Attached and Detached ADU legislation is achieving the intended goals within EIS assumptions.
  - **Petition Item 2:** The scope of the EIS will thoroughly model with relative and current development practices in order to evaluate the incremental impacts to Seattle's defined Tree Canopy Cover relative to the established goals to maintain 30% coverage by 2037. This 'canopy' will be defined for measurement in the EIS as it was originally established in 2007. The most recent Seattle report on the Canopy Cover redefined the term to artificially inflate the coverage amount. The new definition included a more lenient definition of canopy cover than originally defined, but did not increase the goal of 30% accordingly. This is especially significant given Seattle's SF zones where ADU are to be built account for 72% of the city's tree canopy.
  - **Petition Item 3:** Given increased density and reduced open space proposed by the City with Alternate #2, the EIS shall examine the prevailing tree protection rules along with the multiple exceptions; and evaluate how the track record in tree protection would manifest itself in single family lots that incorporate both an attached and a detached accessory dwelling unit. The Study should assess what positive impacts might be possible if prevailing tree protection rules and policies are modified relative to proposed ADU developments. This may include elevating residential zone tree protection requirements to be in accordance with similar provisions for *Lowrise Zones* (including SMC 23.41.018, 23.09.320, 23.44.008, 23.45.015 and 25.11.060 to 070). This Study must also consider current tree protection exceptions offered in the Seattle Municipal

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Code as well as the associated Directors Rules. The statistics must reflect the trend in new construction where tree protection measures as shown in Figure 6 (last page) are rarely accomplished. The Study should include what new tree protection measures would be required within zones where ADU's are allowed so that the 2007 version of the 30% canopy cover goal will be achieved.

- **Petition Item 4:** The scope of the EIS should analyze the demand for additional accessible public park space within Seattle's residential areas given open space will be reduced when replaced by ADU within single-family lots.
- **Petition Item 5:** Given the goal of the EIS should be to remove barriers of Seattle residents to provide ADU on their properties (in lieu of encouraging speculative or non-vested non-resident interests), the Study should assess the financial barriers limiting homeowner investment in the properties. In other words, the Study must examine the impact with or without ADU financing options incentives for existing homeowners (verses only speculative ADU development.) A current cost should be used that accurately reflects the proposed larger ADU size in backyards with limited construction maneuverability – including protection of exceptional trees and tree groves. How will the ADU program allow a home-owner to spend between \$100,000 and \$200,000 on a 1,000 square foot dwelling, and then pay for that investment via rental revenues? Moreover, if the ADU modifications are under the umbrella of Seattle's HALA program, what will the impact to ADU development be if in-lieu-of fees are imposed on those units that are not being rented within affordable thresholds?
- **Petition Item 6:** Unless the rules of the ADU program will be bound to the current 75/80 percent subdivision rules (SMC 23.44.010.B.1), the Study should consider the possible practice of short plat subdivisions of lots over 6,000 square feet. Owners and developers looking to further increase the potential number of dwellings within single-family residential zones may seek to subdivide their lot to maximize its revenue potential. The

petitioners do not enforce this practice of subdividing in order to increase SF-zone density. We recognize, however, that if left unaddressed and unmeasured in terms of the environmental impacts, the true impacts of property subdivision to infrastructure, urban heat islands, and natural Seattle habitats will not be identified. For example, let's say a homeowner sells their 9,600 square foot residential lot to a speculative developer. The developer subdivides the lot into three lots of 3,200 square foot each. The developer then demolishes the one home and builds three new homes – each with an attached and detached ADU. The net number of occupants for the 9,600 square foot parent lot increased from 4 persons to 36 persons. This type of practice is commonly evident in low-rise

multifamily zones where short plat subdivisions are used to gain up to an additional two townhouses on a 5,000 square foot lot.

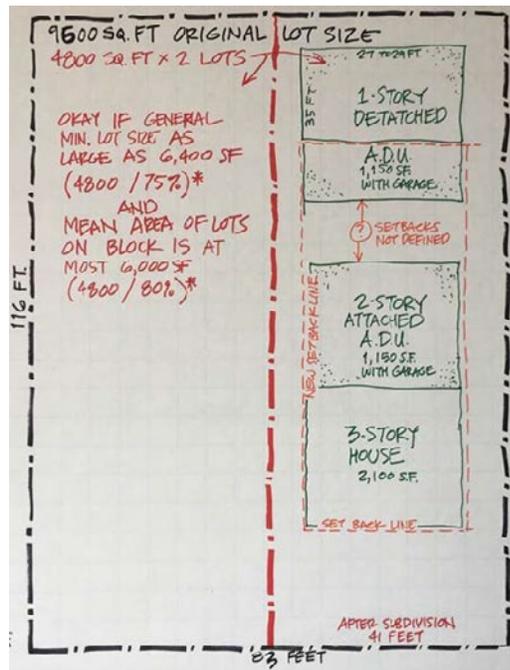
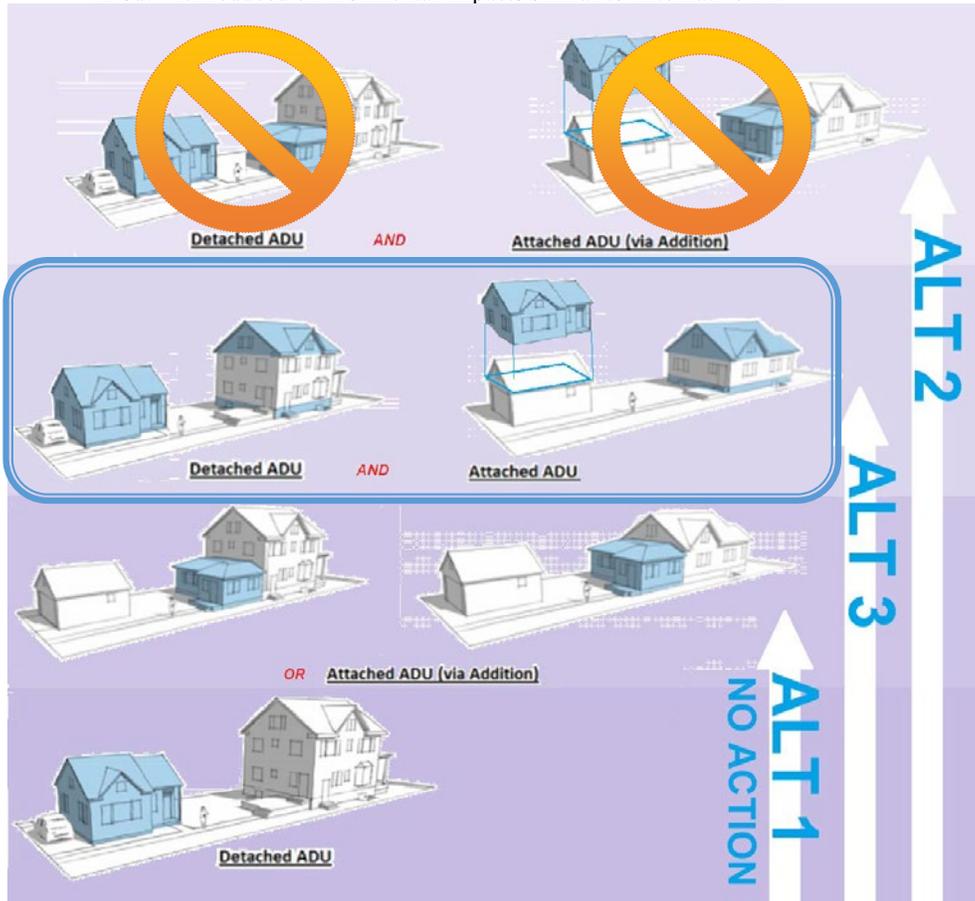


Figure 1- Diagram showing how one 9,600 SF lot might be subdivided by speculative buyers using the 75/80 rule and increase the number of dwellings from one (1) to six (6) or 24 persons on a 9,600 square foot parent lot.

**ALTERNATIVE #3**

In addition to the expanded scope of the EIS for all alternatives as outlined above, this petition calls for additional **Alternative Number 3**. The current proposal to study just the no-action Alternative #1 with the City’s proposed Alternative #2 does not fulfill the State’s requirements to evaluate a broad range of alternatives in the interest of identify a solution with a minimal impact to the environment. Therefore, this EIS shall compare the environmental impact parameters for this alternative (hereafter ‘ALT 3’) as well as other options proposed by other communities.

- **ALT 3: Allowable number of ADU per Lot:** Like the City’s Alternative #2, this alternative allows either or both an Attached Accessory Dwelling Unit (AADU) or a Detached Accessory Dwelling Unit (DADU). The difference, however, is that if one has both, then the AADU may not be an addition to the primary residence, but the AADU must be contained within the footprint (or foundation outline) of the primary residence. This may be manifested in either a ‘daylight basement’ or a second or third floor rental flat. This compromised position should prove to have the revenue benefits of Alternative #2 but with reduced environmental impacts similar to Alternative #1.



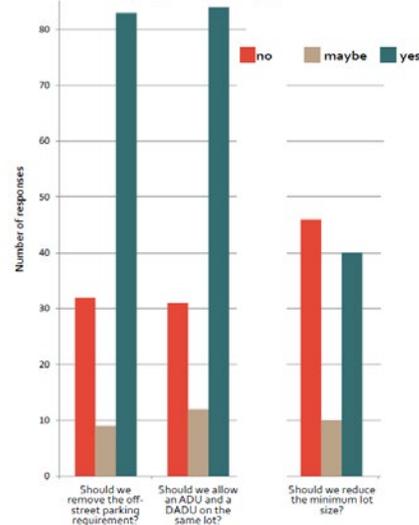
**Figure 2 - Diagram showing the compromise offered in ALT 3 relative to providing both an Attached and a Detached Accessory Dwelling Unit within one single family zoned parent lot while preserving open space for trees and household recreational activities.**

The table on the following pages show a line item comparison of the “No-Action” Alternative 1 with the petition requested Alternative 3. The City’s Alternative 2 has not been included.

<b>Criteria</b>	<b>ALT 1 (No Change)</b>	<b>ALT 3</b>
<b>Number of ADU Allowed on a single-family lot</b> (see prior page and Figure 2)	One Attached ADU or one Detached ADU, but not both.	Same as ALT 1. <b>If at least 80% of the Attached ADU gross floor area is below the primary dwelling, then both a detached ADU and attached ADU is allowed.</b>
<b>Parking</b>	One off-street parking space is required for the ADU unless within Urban Village.	Same as ALT 1. <b>Exception to ADU parking only allowed if frequent transit options are demonstrated for the property.</b>
<b>Owner Occupancy</b>	Owner must occupy the primary residence or ADU at least 6 months in a year.	Same as ALT 1. Owner must occupy the primary residence or <b>one</b> ADU at least 6 months in a year.
<b>Minimum lot size for a DADU</b> (see Figure 3)	4,000 square feet	Same as ALT 1: 4,000 square feet
<b>Maximum square footage of ADU</b>	Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 800 square feet <i>including</i> garage and storage areas.	Similar to ALT 1: Attached ADU: 1000 square feet <i>including</i> garage and storage areas; <b>Detached ADU: 1000 square feet</b> <i>including</i> garage and storage areas.
<b>Maximum Height of ADU</b>	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Same as ALT 1.
<b>Lot Coverage Limit</b>	35% of lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for lots under 5,000 square feet	35% of <b>parent</b> lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for <b>parent</b> lots under 5,000 square feet

- ALT 3: Minimum Lot Size:** Like the existing ADU rules, this alternative does not permit ADU on lots less than 4,000 square feet. Why? Firstly, three dwellings within a lot of 3,200 square foot equates to one dwelling for every 1,067 square feet of lot area. This ratio of dwellings per lot area is even denser than low-rise multifamily zones which are as dense as one dwelling for every 1,600 square feet of lot area, and therefore the City’s ADU proposal is not appropriate. Even though a more appropriate minimum lot size accommodating three (3) households should be at least 4,800 square feet, Alternate #3 seeks a compromise by maintaining the current minimum 4,000 square foot limit. In a small survey of less than 150 persons that the City conducted in January and February of 2016 (right), the participants favored not reducing the minimum lot size requirement.

Feedback on Policy Questions — Meeting Boards  
January 19 and February 3, 2016



Removing Barriers to Backyard Cottages — Summary of Public Input

- ALT 3: Minimum Lot Size in terms of Property Line Setbacks:** In addition to public opinion and multifamily code density thresholds, there are practical issues with a lot size --- that being sufficient property line setbacks. It is a mathematical reality that the smaller the lot, the percentage of the lot that is buildable within setbacks also reduces. For example, a lot that is approximately 4,000 square feet has a buildable area of approximately 1,600 square feet after subtracting front, rear, and side yard setbacks. Setbacks are fixed to allow proper fire separation between structures and to increase the amount of permeable ground surface and daylight distribution. Urban development without landscaped setbacks result in urban heat islands affecting regional habitats. As a generic mathematical analysis demonstrates, lots less than 4,000 square feet in area cannot stay within the maximum lot coverage requirement of 35% without encroaching into minimal front, rear, and side yard setbacks (see Figure 3 below). Only lots over 9,600 square feet result in buildable lot areas over 50% of the lot area, thereby providing excellent opportunities for Detached Accessory Dwelling Units without a sufficient impact to environmental and livability issues.

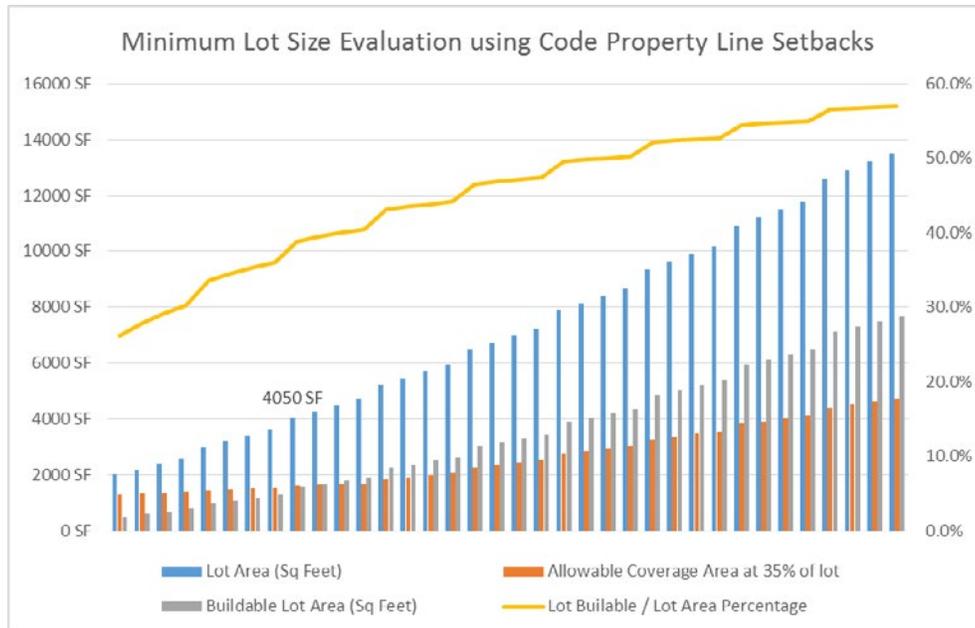


Figure 3- charting the correlation between lot size, buildable area inside property line setbacks, and the allowable 35% coverage area.

- ALT 3: Lot Coverage Limit:** For the same reasons evident in Figure 3 (above), the lot coverage limit of 35% should not be exceeded. The wording has been intentional modified to include the term '*parent*' lot to avoid the increasing environmental impacts to lots that may be subdivided for the purposes of increasing density beyond the property's original potential.
- ALT 3: Maximum square footage of ADU:** Typical multifamily developments (townhouses and row-houses) consist of three-bedroom dwellings that range from 1,500 to 2,000 square feet including parking garage and storage spaces. Units this size are not considered affordable in the recent markets. Accordingly, this petition does not support the idea that accessory dwelling units should be a similar size (1,000 square feet plus parking plus storage space.) Alternative #3 allows a 25% increase in the current ADU limit for detached ADU to not exceed 1,000 square feet *including* garage and storage.

<b>Criteria (continued)</b>	<b>ALT 1 (No Change)</b>	<b>ALT 3</b>
<b>Rear Yard Coverage Limit</b> (see Figures 4 and 5)	40% of a rear yard can be covered by DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	Provide 150 SF of private amenity area for each ADU plus 150 SF of common amenity area for all ADU. (Similar to SMC 23.45.522 - Amenity area.) This area excludes required side and rear yard setbacks less than 10 feet in width. Remaining rear yard can be covered by DADU and accessory structures (like a garage).
<b>Location of entries</b>	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right of way.	Same as ALT 1.
<b>Roof features</b>	No exception to the height limits are allowed for roof features on accessory structures.	Exceptions to the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
<b>Household Size</b>	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU.	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU. If the lot qualifies for Attached and Detached ADU, the limit = 12.
<b>MHA Requirements</b>	Not applicable	Same as ALT 1
<b>Rental Registration and Inspection Ordinance</b>	No change to present requirements.	Same as ALT 1

- **ALT 3: Rear Yard Coverage Limit:** The City’s Alternative #3 proposes to increase the rear yard coverage from the current 40% to a new value of 60% coverage including a AADU, DADU and other accessory structures (like a garage). It is unclear, however, how the additional coverage of 20% will be manifested given mathematical models suggest that in no case will the backyard coverage exceed 53% without encroaching on setbacks (Figure 4 below).

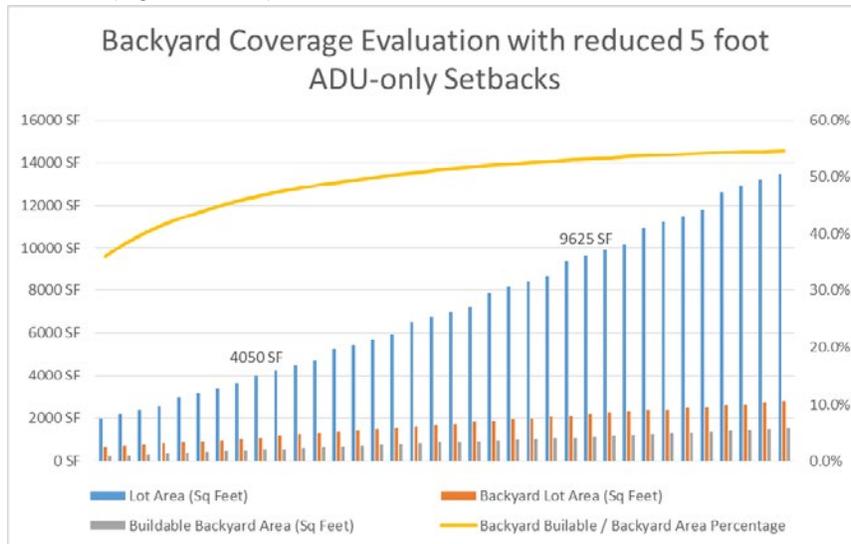


Figure 4 - Similar to site areas in Figure 3, this chart identifies the percentage of buildable area in the backyard relative to the size of the backyard established by code-defined setbacks.

- ALT 3: Rear Yard Coverage in Terms of Exterior Amenity Area:** Given the City’s ambiguity of backyard coverage calculations (40% and 60%) relative to measuring the subsequent impact on the environment, this petition supports establishing minimum backyard amenity space instead – similar to that defined in multifamily zones (SMC 23.45.522 - Amenity area). Figure 5 (below) demonstrates that using percentages in backyards may result in wasted unusable exterior space – of not repeated requests to ask for a variance in setbacks in order for 60% coverage to be achieved. Due to the lack of objective in the City’s proposal, this Alternative #3 requires providing a minimum 150 square feet of private amenity area for each ADU plus an additional minimum 150 SF of common amenity area for all ADU on a lot. This amenity area excludes required side and rear yard setbacks less than 10 feet in width. The remaining rear yard can be covered by DADU and accessory structures (like a garage). Keep in mind, as well, that a healthy tree over 25 feet in height needs at least a circular area of 600 to 750 square feet to be sustained, mature, and sequester carbon.

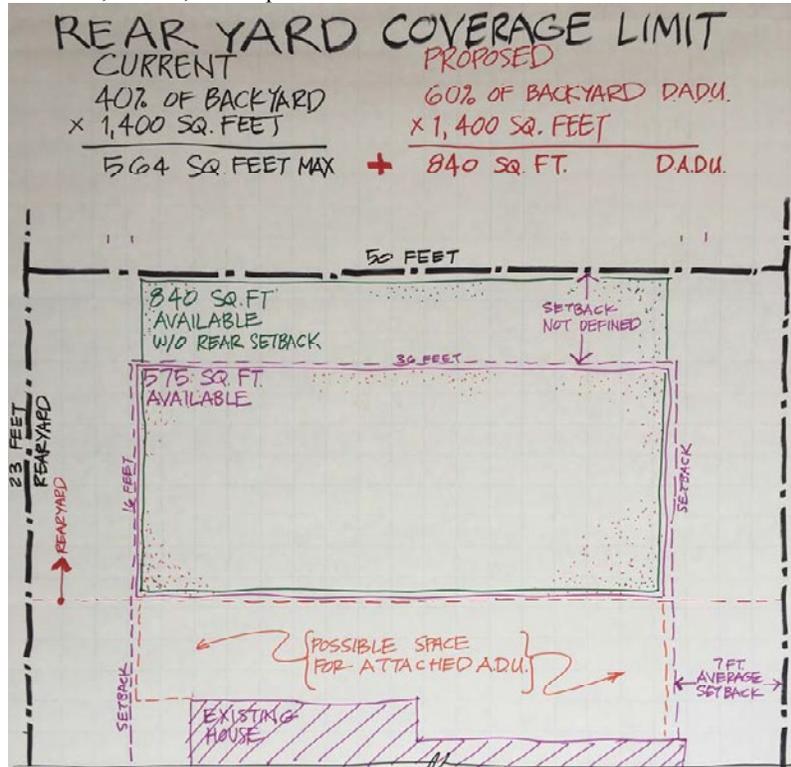


Figure 5 - One example of a rear yard that suggests that 60% coverage is not possible without building into required setbacks. As such, the end results would be limited space for exterior household activities.

- ALT 3: Parking:** The scope of EIS for ADU should not include a greater leniency in parking requirements than what is required in multifamily areas. The City’s proposed Alternative #2 suggests that parking for ADU dwellings does not matter in SF zones, although it does matter in other residential zones. Therefore, this petition seeks to maintain existing ADU provisions to provide one off-street parking space for each ADU unless within an Urban Village or if defined frequent transit options are demonstrated by the owner for the property.
- ALT 3: Other aspects:** The other aspects of this ALT #3 coincide with current ADU requirements identified in the no action Alternative #1. However, exceptions to the height limits are allowed only for projections like dormers that add interior space, subject to the provisions applicable to single-family houses. Also, if the lot qualifies for both an Attached (within primary dwelling footprint) and Detached ADU, the new limit on the number of occupants may be increased to 12.

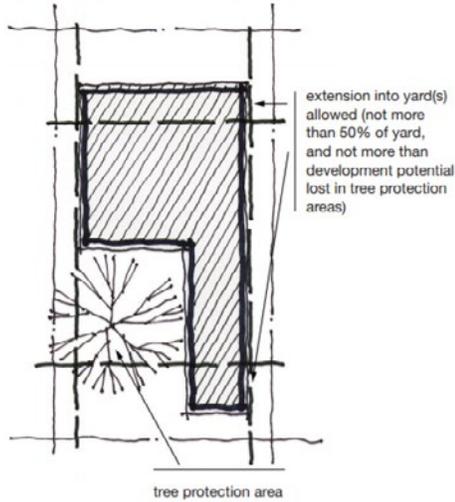
Representing those 87 who have signed the petition as organized by the Land Use Committee of the Magnolia Community Council\*:

David Moehring  
3444 23<sup>rd</sup> Ave West  
Seattle, WA 98199  
[dmoehring@consultant.com](mailto:dmoehring@consultant.com)  
m 312-965-0634

Carrie Frankenburg  
2806 35<sup>th</sup> Avenue West  
Seattle, WA 98199  
[carriefrankenburg@\\*\\*\\*.com](mailto:carriefrankenburg@***.com)



Figure 1. Example of tree protection in single family zones



#### Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 6- Current tree protection measures in lowrise development shall be extended into ADU development parameters.

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
**Petition to Seattle EIS Scoping for Accessory Dwelling Units (ADU and DADU) within Single-Family Residential Zones**

The undersigned Seattle residents *do not support* proposed Alternative #2 proposed for Accessory Dwelling Units (ADU) as we find the alternative’s parameters are *contrary* to the goal of “livable communities”, diverse affordable housing options, and consequential reduction of Seattle’s heritage and exceptional trees and ‘green canopy’.

Therefore, this petition calls to broaden the scope of the Environmental Impact Study (EIS) regarding the City’s proposed incentives for Accessory Dwelling Units (ADU). The EIS shall include the additional environmental impact parameters for all Alternatives being considered:

- A mandatory evaluation period 2 and 4 years after implementation to ensure any Attached and Detached ADU legislation is achieving the intended goals.
- Incremental impacts to Seattle’s designated Tree Canopy and goals for 30% coverage by 2037.
- Given increased density proposed by the City with Alternate #2, the EIS shall require enforcing tree protection rules for proposed ADU developments in accordance with similar provisions for *Lowrise Zones* including Streamlined Design review (including SMC 23.41.018, 23.09.320, 23.44.008, 23.45.015 and 25.11.060 to 070).
- Analyze the demand for additional public park space in residential areas where open space is replaced by ADU on single-family lots.
- Impact with or without ADU financing options incentives for existing homeowners (verses only speculative ADU development.)
- Impacts of short plat subdivisions of lots over 6,000 square feet by those owners and developers looking to further increase the potential number of dwellings within single-family residential zones.

In addition to the expanded scope of the EIS for all alternatives as outlined, this petition calls for additional **Alternative Number 3** (hereafter ‘ALT 3’) to be studied within the Study:

<b>Criteria</b>	<b>ALT 1 (No Change)</b>	<b>ALT 3</b>
<b>Number of ADU Allowed on a single-family lot</b>	One Attached ADU or one Detached ADU, but not both.	Same as ALT 1. If at least 80% of the Attached ADU gross floor area is below the primary dwelling, then both a detached ADU and attached ADU is allowed.
<b>Parking</b>	One off-street parking space is required for the ADU unless within Urban Village.	Same as ALT 1. Exception to ADU parking only allowed if frequent transit options are demonstrated for the property.
<b>Owner Occupancy</b>	Owner must occupy the primary residence or ADU at least 6 months in a year.	Same as ALT 1. Owner must occupy the primary residence or <b>one ADU</b> at least 6 months in a year.
<b>Minimum lot size for a DADU</b>	4,000 square feet	Same as ALT 1: 4,000 square feet
<b>Maximum square footage of ADU</b>	Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: 800 square feet <i>including</i> garage and storage areas.	Similar to ALT 1: Attached ADU: 1000 square feet <i>including</i> garage and storage areas; Detached ADU: <b>1000 square feet including</b> garage and storage areas.
<b>Maximum Height of ADU</b>	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Same as ALT 1.
<b>Lot Coverage Limit (of Primary Residence)</b>	35% of lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for lots under 5,000 square feet	35% of <b>parent</b> lot area for lots 5,000 square feet and larger; and 15% of lot area plus 1,000 square feet for <b>parent</b> lots under 5,000 square feet

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

**Criteria (continued)**

**Rear Yard Coverage Limit**

**ALT 1 (No Change)**

40% of a rear yard can be covered by DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.

**ALT 3**

Provide 150 SF of private amenity area for each ADU plus 150 SF of common amenity area for all ADU. (Similar to SMC 23.45.522 - Amenity area.) This area excludes required side and rear yard setbacks less than 10 feet in width. Remaining rear yard can be covered by DADU and accessory structures (like a garage).

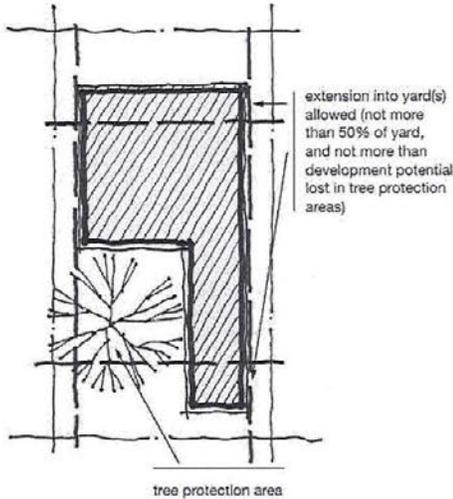
<b>Location of entries</b>	DADU entrances cannot face the nearest side or rear lot line unless that lot line abuts an alley or other public right of way.	Same as ALT 1.
<b>Roof features</b>	No exception to the height limits are allowed for roof features on accessory structures.	Exceptions to the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
<b>Household Size</b>	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU.	Any number of related people, or up to 8 unrelated people can live on a single family lot, including in an Attached or Detached ADU. If the lot qualifies for Attached and Detached ADU, the limit = 12.
<b>MHA Requirements</b>	Not applicable	Same as ALT 1
<b>Rental Registration and Inspection Ordinance</b>	No change to present requirements.	Same as ALT 1

	Alternative 1 (No Action)	Alternative 2
Number of ADUs allowed on a single-family lot	A single-family lot can have one ADU or one DADU, but not both.	A single-family lot can have an AADU and a DADU.
Parking	One off-street parking space required for an AADU or DADU unless the lot is in an urban village.	No off-street parking required.
Owner-occupancy	An owner must occupy either the main house or the AADU/DADU 6 months a year.	No requirement for an owner to occupy the house, AADU, or DADU.
Minimum lot size for a DADU	4,000 square feet	3,200 square feet
Maximum square footage	AADU 1,000 square feet, including garage and storage areas. DADU 800 square feet including garage and storage areas.	AADU 1,000 square feet, excluding garage and storage areas. DADU 1,000 square feet, excluding garage and storage areas.
Maximum height	No change from existing height limits, which vary by lot width and range from 15-23 feet.	Height limits are 1-3 feet higher than existing limits, depending on lot width.
Lot coverage limit	35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.	
Rear yard coverage limit	40 percent of a rear yard can be covered by a DADU and other accessory structures (like a garage). This limit applies in addition to the overall lot coverage limit.	50 percent of a rear yard can be covered by a DADU and other accessory structures, if the DADU is only one story and if rear yard coverage from other accessory structures is less than 40 percent.
Location of entries	DADU entrances cannot face the nearest side or rear lot line unless the lot line abuts an alley or other public right-of-way.	DADU entrances can be on any facade, provided it is 10 feet from the lot line if located on the facades facing nearest side or rear lot line (unless abutting right-of-way).
Roof features	No exceptions from the height limit are allowed for roof features on accessory structures.	Exceptions from the height limit are allowed for projections like dormers that add interior space, subject to the provisions applicable to single-family houses.
Household size	Any number of related people, or up to 8 unrelated people, can live on a single-family lot, including in an AADU or DADU.	Any number of related people, or up to 8 unrelated people, can live on a single-family lot with an AADU or DADU. If the lot has an AADU and DADU, the limit is 12.
MHA requirements	Mandatory Housing Affordability (MHA) does not apply to creation of ADUs in Single-Family zones.	
Rental Registration & Inspection Ordinance (RRIO)	Property owners renting one or more units, including in Single-Family zones, must register for inspections to ensure housing is safe and meets basic maintenance requirements.	

Figure 1 – (above) for reference, current alternative as published by the City of Seattle

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

1 Name Pat Carroll Crippen Signature [Signature]  
 Street Address 6811 Phinney Ave or email patatie@a.comcast.net  
 Registered Seattle voter? (Circle One)  Yes  No Date \_\_\_\_\_

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

2 Name CHRISTOPHER KIRK Signature [Signature]  
 Street Address 1925 35TH AVE W or email CARIS@KIRKCC.COM  
 Registered Seattle voter? (Circle One)  Yes  No Date 10/28/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

3 Name Vibekke Parks Signature Vibekke N. Parks  
 Street Address 4335 32nd Ave W or email vibekkeparks@me.com  
 Registered Seattle voter? (Circle One) Yes  No  Date Resident/Green Card

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

4 Name Patrick + Nancy Maylan Signature NJ Maylan  
 Street Address \_\_\_\_\_ or email nancy.j.wade@yachos.com  
 Registered Seattle voter? (Circle One) Yes  No  Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

5 Name Sean Buldeschewitz Signature [Signature]  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

6 Name Michael Smith Signature [Signature]  
 Street Address 4321 31st Ave West or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 10/28/2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

7 Name Brian Cook Signature Brian Cook  
 Street Address 9334-32nd Ave or email tobecooked@earthlink.net  
 Registered Seattle voter? (Circle One)  Yes No Date 10/27/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

8 Name Judith M. Gubb Signature Judith M Gubb  
 Street Address 4338 32nd Ave West or email judithawriteguru.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

9 Name Alice Foggi Signature A Foggi  
 Street Address 6510 Francis or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

10 Name JAN KATZENBERGER Signature JAN KATZENBERGER  
 Street Address 2051 NW 60th St or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

11 Name Chase Thompson Signature [Signature]  
 Street Address 4345 31st Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

12 Name John DeGrande Signature [Signature]  
 Street Address 4009 W. Barton St or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10.28.17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

13 Name Michael McHugh Signature [Signature]  
 Street Address 4009 W Barton or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10.28.17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

14 Name CRAIG ALLEGAN Signature [Signature]  
 Street Address 3919 W. BARTON ST. or email CRAIGALLEGAN@MRE.COM  
 Registered Seattle voter? (Circle One) Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

15 Name Margaret Sturdivant Signature Margaret Sturdivant  
 Street Address 6412 34th NW or email psturdivant@earthlink.net  
 Registered Seattle voter? (Circle One)  Yes No Date \_\_\_\_\_

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

16 Name ANDREW KIRSH Signature Andrew Kirsh  
 Street Address 1414 E. HARRISON ST. APT 5 or email andrewkirsh@hotmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10-30-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

17 Name DAVID MOEHRING Signature David Moehring  
 Street Address 3444 73rd Ave W #B or email dmoehring@consultant.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10-30-2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

18 Name Kerry C. Fitzgibbons Signature *Kerry C. Fitzgibbons*  
 Street Address 6016 20<sup>th</sup> AVE NW or email Fitzgibbons.Kerry@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

19 Name Dawn Fitzgibbons Signature *Dawn Fitzgibbons*  
 Street Address 6016 20<sup>th</sup> AVE NW or email dawn.fitzgibbons@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

20 Name Linda Bothell Signature *Linda Bothell*  
 Street Address 1728 Magnolia Blvd West or email lindabothell@me.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

21 Name Barry Porter Signature [Signature]  
 Street Address 2802 35th Ave West or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

22 Name Kristin Stanislaw Signature [Signature]  
 Street Address 2823 35th Ave W or email Kristin.Stanislaw@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

23 Name Tim Opieła Signature [Signature]  
 Street Address 2923 35th Ave W or email Kristin.Stanislaw@gmail.com  
 Registered Seattle voter? (Circle One) Yes No Date 10/30/17

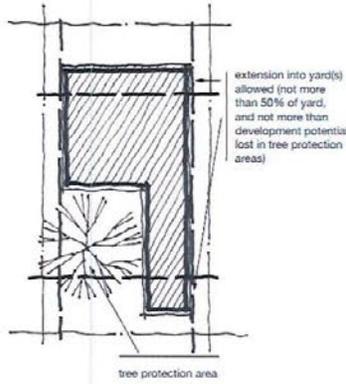
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

24 Name Loel Bjorklund Signature [Signature]  
 Street Address 2829 35th Ave W or email Loel.Bjorklund@gmail.com  
 Registered Seattle voter? (Circle One) Yes No Date 10-30-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy,
- Identifying the demand for additional public park space in residential areas,
- Identifying viability of existing homeowner ADU financing options incentives,
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

25 Name Bruce D. Carter Signature [Signature]  
 Street Address 3012 W. Barton Seattle or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No  No Date 10/26/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy,
- Identifying the demand for additional public park space in residential areas,
- Identifying viability of existing homeowner ADU financing options incentives,
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

26 Name BRITV SANDERS Signature [Signature]  
 Street Address 3012 West Barton Seattle or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No  No Date 10/26/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).

In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

27

Name Kevin Brooks Signature [Signature]  
 Street Address 2855 35th Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).

In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

28

Name Christina Brooks Signature [Signature]  
 Street Address 2855 35th Ave W or email chrisbrooks@yahoo.com  
 Registered Seattle voter? (Circle One) Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).

In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

29

Name Galen Bodie Signature [Signature]  
 Street Address 2945 35th Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).

In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

30

Name Carrie Frankenburg Signature [Signature]  
 Street Address 2906 39th Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

31 Name James M. Mulvan Signature James M. Mulvan  
 Street Address 3916 W. Bottom or email jmm.mulvan.com@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date Oct 27, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

32 Name PATRICK LIPO Signature Pat Lipo  
 Street Address 3712 W. Prosper St or email patlipo@yahoo.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/28/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

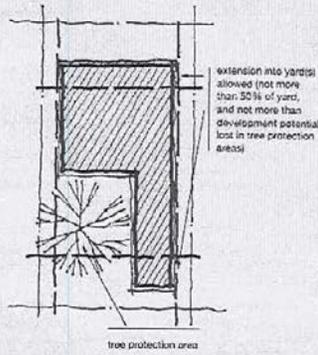
33 Name CARL DAHLMAN Signature Carl Dahlman  
 Street Address 3214 37th AVE or email carldahlman1@comcast.net\*  
 Registered Seattle voter? (Circle One)  Yes No Date 10/28/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

34 Name JOHN MUNROE Signature John Munroe  
 Street Address 6553 25th AVE NW or email jhm@oceancurrents.biz  
 Registered Seattle voter? (Circle One)  Yes No Date 10-30-17

Figure 1. Example of tree protection in single family zones



**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/D7D/Publications/CAM/cam32.pdf>

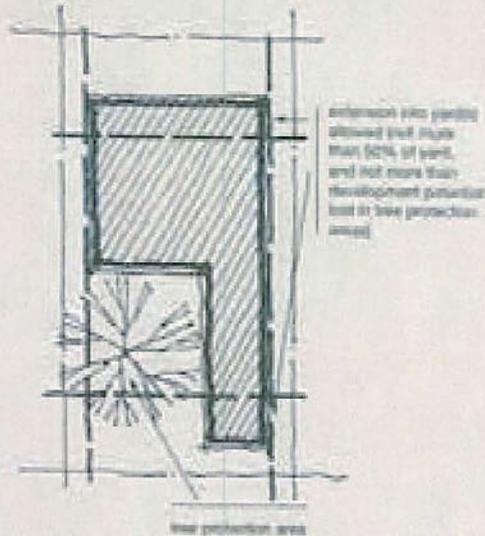
Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

35 Name Patricia Laesche Signature Patricia Laesche  
 Street Address 4317 2nd Ave NW 98107 or email  
 Registered Seattle voter? (Circle One) Yes No Date 10/31/17

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it wants to allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070 A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of this additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070 A.3.a.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAS/Jan11.pdf>

**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

36 Name Julia Field Signature [Signature]  
 Street Address 2034-A NW 60th St or email juliafield@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 10/26/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

37 Name Julie Galper no back Signature [Signature]  
 Street Address \_\_\_\_\_ or email yu.jazz@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 10/26/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

38 Name James Bucher Signature [Signature]  
 Street Address 3451 22nd Ave W. unit B or email james.e.bucher@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date Nov 5, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

39 Name David Buler Signature [Signature]  
 Street Address 3451 22nd Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 11/5/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

40 Name Deborah Alt Signature [Signature]  
 Street Address 5024 Puget Blvd SW or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date Nov 5, 2017

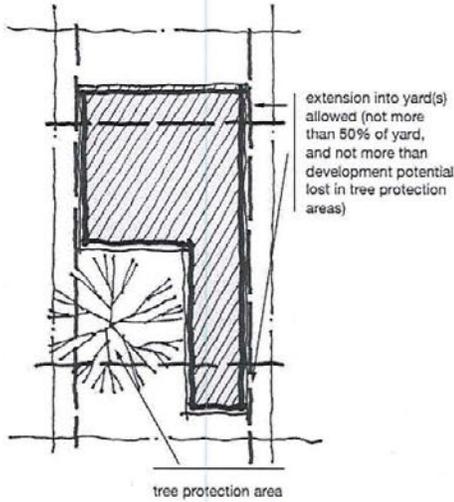
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle’s designated Tree Canopy.
- identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

41 Name Robin Lee Signature [Signature]  
 Street Address 3011 23rd Ave W or email roblee@yahoo.com  
 Registered Seattle voter? (Circle One)  Yes No Date 11/10/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

**Figure 1. Example of tree protection in single family zones**



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

*Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.*

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

42 Name Brian Rulifson Signature *Brian Rulifson*  
 Street Address 4335 2nd AVE NW, 98107 or email brgovmail@rulifson.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 31 October 2017

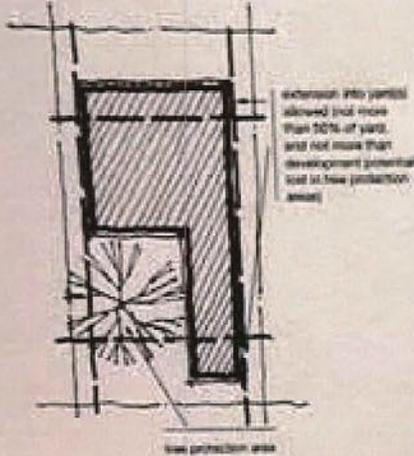
**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

43 Name Julie Ross Signature *Julie Ross*  
 Street Address 3630 24th Ave W or email jewelsross@yahoo.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 11-10-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017

Figure 1. Example of tree protection in single family zones



Lowrise 1, Lowrise 2 and Lowrise 3 Zones

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.0110), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development (standard adjustments as permitted in streamlined design review pursuant to 23.41.0110).
- Development standard departures, including extensions into required setbacks pursuant to 23.41.017.
- Increase in permitted height as permitted in 25.11.070.A.3 or up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Policies/COI/Tree/02.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

44 Name Tanice K. Price Signature Tanice K. Price  
 Street Address 118 N. 43rd St. or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes  No Date 10/31/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

45 Name Kate ... Signature Kate ...  
 Street Address 2632 23rd Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes  No Date 11-10-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

46 Name Susan Walters Signature [Signature]  
 Street Address 2016 NW 60th St or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 10/29/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

47 Name Laura Wing Signature [Signature]  
 Street Address 3652 23rd Ave W or email [Email]  
 Registered Seattle voter? (Circle One) Yes  No  Date 11/10/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

48 Name Jake Savick Signature [Signature]  
 Street Address 3652 23rd Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 11/10/17

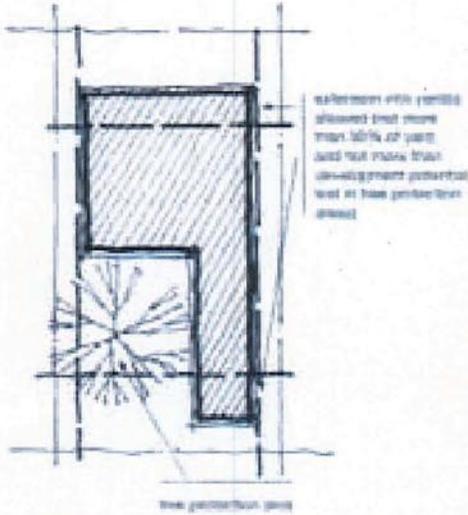
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date \_\_\_\_\_

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in all allowed design review pursuant to 23.41.010
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012
- Increase in permitted height as permitted in 25.11.070 A.2 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by existing development within the tree protection zone.
- Reduction in number of required parking spaces as permitted in 25.11.070 A.3.c

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/ZPD/Publications/CAU/2012.pdf>

**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.010), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

49 Name DAVIDYA KASPERZYK Signature D. Kasperzyk  
 Street Address 1543 NW 62nd St or email kzkbioc@seattle.gov  
 Registered Seattle voter? (Circle One) Yes No Date Oct. 27, 2017

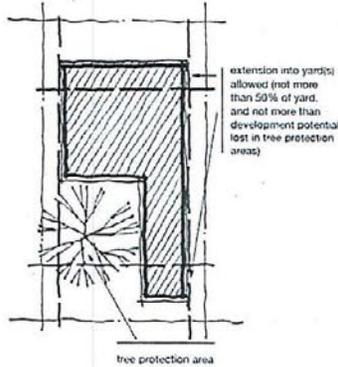
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

50 Name Phoebe Fine Signature Phoebe Fine  
 Street Address 1543 NW 62nd St or email phoebe@adl.com  
 Registered Seattle voter? (Circle One) Yes No Date 10/27/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

Figure 1. Example of tree protection in single family zones



**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**  
 If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

- limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:
- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
  - Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
  - Increase in permitted height as permitted in 25.11.070 A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 8:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
  - Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.  
<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

51 Name Betsy Ross Signature Betsy Ross  
 Street Address 5246 40th Ave W or email Betsy.Ross@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

52 Name Charles Ross Signature Charles Ross  
 Street Address 5246 40th Ave W or email charles.ross@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 10/30/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

53 Name BARBARA JO GREEN Signature Barbara J. Green  
 Street Address 201 NW 40th St or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/31/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

54 Name Denise Perry Signature Denise Perry  
 Street Address 2912 4th Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

55 Name Sharon Levine Signature Sharon Levine  
 Street Address 2819 4th Ave. W or email sweetumsseattle@yahoo.com  
 Registered Seattle voter? (Circle One)  Yes No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

56

Name Melissa Martin Signature [Signature]  
Street Address 1745 25th Ave NW or email MELISSAMARTINO@GMAIL.COM  
Registered Seattle voter? (Circle One)  Yes No Date 10-30-2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

57

Name ALBERT TORRICO JR Signature [Signature]  
Street Address 6745 25th AVE NW or email TORRICOJR@GMAIL.COM  
Registered Seattle voter? (Circle One) Yes No Date 10/30/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

58

Name Debra Abrahamson Signature [Signature]  
Street Address 4533 Eastern Ave N or email Seattle WA 98103  
Registered Seattle voter? (Circle One)  Yes No Date 10/31/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

59

Name David L. Rissler Signature DAVID L. RISSLER  
Street Address 2833 35th AVE W or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10-31-17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

60 Name Irene Swaaberg Signature Irene Swaaberg  
 Street Address 2613 35th Ave or email swanlets@comcast.net  
 Registered Seattle voter? (Circle One)  Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

61 Name TRI VO Signature Tri Vo  
 Street Address 2638 35th Ave W or email trivo300@yahoo.com  
 Registered Seattle voter? (Circle One)  Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

62 Name Gretchen Johnson Signature Gretchen Johnson  
 Street Address 2629 35th Ave W or email gretchen-johnson@live.com  
 Registered Seattle voter? (Circle One)  Yes No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

63 Name JOSE MARTINEZ Signature Jose Martinez  
 Street Address 7319 35th Ave W or email martinez.jose@gmail.com  
 Registered Seattle voter? (Circle One)  Yes No Date 11/12/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

64 Name Bill H. Williamson Signature Bill H. Williamson  
 Street Address 2856 36th Ave W or email billwilliamson352@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

65 Name Joann H. Sullivan Signature Joann H. Sullivan  
 Street Address 2856 36th Ave W or email joann212@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/12/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

66 Name Martin Blums Signature M. Blums  
 Street Address 2812 35th Ave W or email MIBLUMS@GMAIL.COM  
 Registered Seattle voter? (Circle One) Yes  No  Date 11/12/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

67 Name Angela Blums Signature Angela Blums  
 Street Address 2812 35th Ave. W or email aroseblums@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/12/17

Petition to Scope of EIS for ADU, City of Seattle

**In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

11/14/2017

68

Name \_\_\_\_\_ Signature \_\_\_\_\_  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

68 Name John Brodie Signature John Brodie  
 Street Address 2845 35<sup>th</sup> Ave W or email JOHN.BRODIE@GMAIL.COM  
 Registered Seattle voter? (Circle One) Yes  No  Date \_\_\_\_\_  
 (I'm Canadian!)

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

69 Name Rebecca Rissler Signature Rebecca Rissler  
 Street Address 2833 35th Ave W or email brwnewer@swede@comcast.net  
 Registered Seattle voter? (Circle One) Yes  No  Date 10-31-17

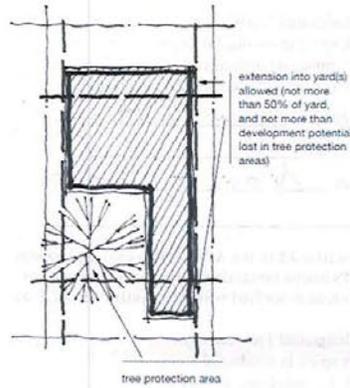
**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

70 Name Edith Birk Signature Edith Birk  
 Street Address 2602 35th Ave W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 10/31/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017

**Figure 1. Example of tree protection in single family zones**



limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree.

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

*Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.*

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

71 Name Heidi Porter Signature Heidi Porter  
 Street Address 3018 34th Ave W. or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date Nov 4, 2017

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

72 Name Margaret Porter Signature Margaret Porter  
 Street Address 3018 34th Ave W. or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date November 21, 2017

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study – Nov 2017  
 As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

73 Name Frederick C. Parker Signature Frederick C. Parker  
 Street Address 3018 34th W or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes  No Date Nov. 4, 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

74 Name Natasha Baswell Signature Natasha Baswell  
 Street Address 2014 West Bavelle St or email ntshbaswell@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date \_\_\_\_\_

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

75 Name George D. Demos Signature George D. Demos  
 Street Address 2631 35th Ave W or email DemosGIS2@comcast.net  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/6/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
 In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

76 Name Chris Mount Signature Chris Mount  
 Street Address 2803 35th Ave W or email chridomo@gmail.com  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/6/17

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

77

Name Traum Peltier Signature Traum Peltier  
Street Address 14140 Dayton Ave N or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date 10-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

78

Name Helen R Haladyna Signature Helen R Haladyna  
Street Address \_\_\_\_\_ or email hthaladyna@gmail.com  
Registered Seattle voter? (Circle One)  Yes No Date 11-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

79

Name Helen McDuffie Signature Helen E McDuffie  
Street Address \_\_\_\_\_ or email helenmcduffie84@gmail.com  
Registered Seattle voter? (Circle One)  Yes No Date 11-2-17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3).  
In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

80

Name Alison Eckels Signature alison.eckels@gmail.com  
Street Address 311 N 47th St - 9003 or email \_\_\_\_\_  
Registered Seattle voter? (Circle One)  Yes No Date \_\_\_\_\_

X

81

~~Wendy~~  
411 page  
Wendy Thompson Shearer  
2107 NW 65th St  
Seattle, WA 98117  
 (yes)  
wendythompsonshearer@gmail.com

Petition to the Accessory Dwelling Unit (ADU) Environmental Impact Study - Nov 2017  
As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

82 Name MARK COOPER Signature [Signature]  
 Street Address 2630 N 86<sup>th</sup> ST or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes  No Date 11/1/17

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

83 Name ANNE HANSGRABE Signature [Signature]  
 Street Address 2630 NW 86<sup>th</sup> ST or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 11/2/2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

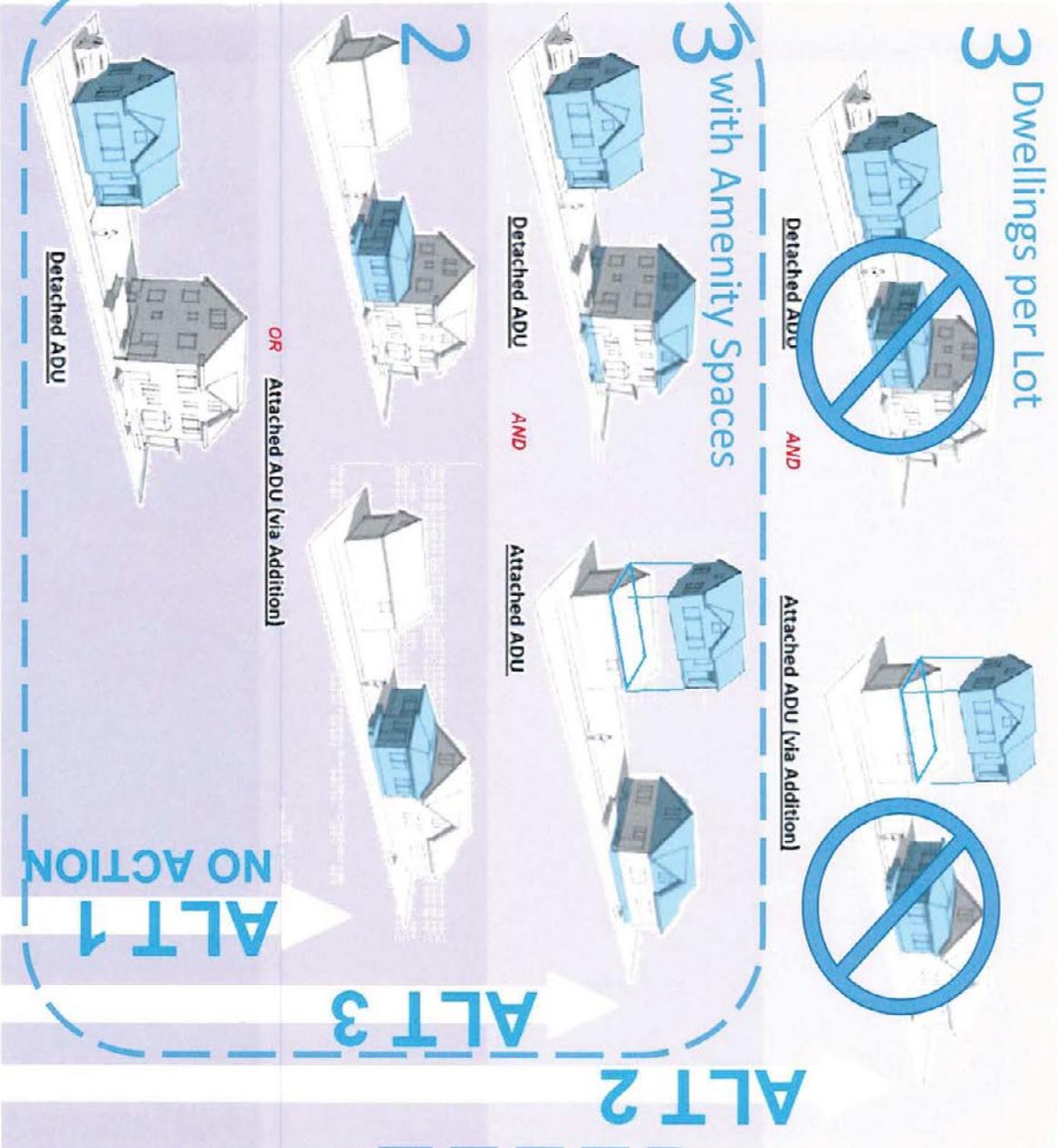
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

84 Name MICHAEL TOLLERSON Signature [Signature]  
 Street Address 4112 2<sup>nd</sup> AVE NE or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date 13 NOV 2017

As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:

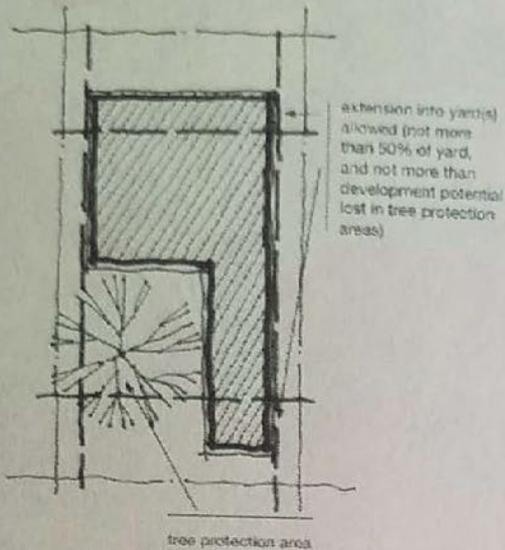
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_  
 Street Address \_\_\_\_\_ or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One) Yes  No  Date \_\_\_\_\_



- ALT 2 includes both AADU and DADU in backyard.
- Reduced green space and trees.
- No parking required
- Reduced privacy.
- ALT 3 allows only 1 ADU in backyard, where AADU must be mostly within primary dwelling footprint if DADU is also provided.
- Parking required.
- Min. required outdoor space for each ADU
- No Action (ALT 1) allows only 1 ADU.
- Parking Required.

Figure 1. Example of tree protection in single family zones



**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018.
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name \_\_\_\_\_ Signature \_\_\_\_\_

Street Address \_\_\_\_\_ or email \_\_\_\_\_

Registered Seattle voter? (Circle One) Yes No Date \_\_\_\_\_

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

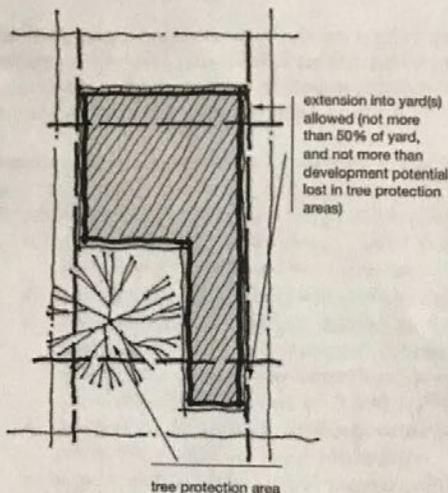
- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

Name Richard Ellison Signature [Signature]

Street Address 8003-28th Ave NE or email climbwall@MSN.com

Registered Seattle voter? (Circle One) Yes No Date Oct 31, 17

Figure 1. Example of tree protection in single family zones



**Lowrise 1, Lowrise 2 and Lowrise 3 Zones**

If there is an exceptional tree on the site, the project must go through streamlined design review (pursuant to 23.41.018), even if the project is below the design review threshold for number of units, unless the applicant proposes to preserve the tree without departures. Exceptional tree removal is permitted only in

limited circumstances where protecting the tree during construction would prevent the maximum allowed floor area from being achieved. A site's allowed floor area in these zones is regulated by floor area ratio limits. The project (up to its "development potential") must use one or more of the following options if it would allow preservation of the tree:

- Development standard adjustments as permitted in streamlined design review pursuant to 23.41.018,
- Development standard departures, including extensions into required setbacks pursuant to 23.41.012.
- Increase in permitted height as permitted in 25.11.070.A.3 of up to 50 feet to the top of a pitched roof with a minimum slope of 6:12 for a principal structure with a base height limit of 40 feet that is subject to the pitched roof provisions of 23.45.514.D. This additional height must be needed to accommodate additional development on an additional floor. The amount of the additional floor area is limited to the amount of floor area lost by avoiding development within the tree protection area.
- Reduction in number of required parking spaces as permitted in 25.11.070.A.3.c.

Applicants may use any of the above departures to retain these trees.

<http://www.seattle.gov/DPD/Publications/CAM/cam242.pdf>

Figure 2 - Current tree protection measures in lowrise development shall be extended into ADU development parameters.

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

86 Name Laura Cooper Signature [Signature]  
 Street Address 7710 31st Ave NW or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date Oct 27, 2017

**As a Seattle resident, I do not support proposed Alternative #2 to the ADU EIS Scope; and hereby petition for the City of Seattle to include within the EIS Scope sustaining current open space and parking requirements for each Accessory Dwelling Unit as described with Alternative #3 (ALT 3). In addition, the scope of the EIS shall also include:**

- Measuring the incremental impacts to Seattle's designated Tree Canopy.
- Identifying the demand for additional public park space in residential areas.
- Identifying viability of existing homeowner ADU financing options incentives.
- Measuring impacts of short plat subdivisions of lots over 6,000 square feet to density.

87 Name Joshua Fliegel Signature [Signature]  
 Street Address 1409 NE 70th St or email \_\_\_\_\_  
 Registered Seattle voter? (Circle One)  Yes No Date 10/27/2017

**ADUEIS**

---

**From:** Janis Fulton <jfulton@uw.edu>  
**Sent:** Thursday, November 16, 2017 9:05 PM  
**To:** ADUEIS  
**Subject:** To ADU EIS reviewers from JRFulton  
**Attachments:** To ADU EIS reviewers JRFulton.docx

To ADU EIS reviewers from JRFulton

To ADU EIS reviewers,

Attached are 7 comments (some with multiple parts) and two general recommendations in response to the Scoping Period for the ADU/DADU EIS ([www.seattle.gov/council/adu-eis](http://www.seattle.gov/council/adu-eis)).

I have stated my observations and concerns posed my comments and questions around the scoping considerations.

Janis Fulton  
4336 Baker Ave NW  
Seattle WA 98107  
206 789 6238

**The following Comments 1-3 are in regards to Options 1 and 3 Alternative 2**

**Option 3. Alternative 2. No Requirement for owner to occupy the house, AADU or DADU.**

**Please Do Not Remove the Owner Occupancy Requirement.** It is antithetical, loathsome, and anathema to the concept of a neighborhood. A Developer/Absentee Landlord has no vested interest in quality, aesthetics or maintaining long term or constructive relationships with the people/neighbors that live in the neighborhood. It would significantly reduce the quality of life, cohesiveness and character that single-family zones provide and promote.

**Option 1. Alternative 2. A SF lot can have an ADU and a DADU.**

**Allowing Three Dwelling Units on a Lot combined with lifting the Owner Occupancy requirement sounds like a developer's dream-come-true. It turns SF lots into an investment rather than preserving any semblance of a neighborhood.**

It's counter to the idea of what a neighborhood is. OR It destroys the whole idea of what a neighborhood is. It essentially changes a SF zoned neighborhood into an apartment complex.

Parts of every one of the 5 elements of the environment proposed for analysis in the EIS are affected by the 2 (alternative 2) proposals of allowing 3 units to a lot and lifting the owner-occupancy requirement. I will comment on the first three.

**LAND USE.**

**Comment 1. Compatibility of alternatives with SF zoning.**

Both proposals are incompatible with the definition and concept of SF zoning.

The EIS should address how the quality of life, cohesiveness, aesthetics and character of SF neighborhoods will be changed by these proposals.

### **Comment 2. Potential elimination of existing housing.**

Seattle is already losing existing housing due to zoning that allows the tear-down of existing relatively affordable housing and the building of lot-line to lot-line outsized mini-mansions (that don't fit in the neighborhood and steal privacy from their neighbors). This is not increasing the amount of affordable housing and seems incompatible with the Mandatory Housing Affordability EIS.

The EIS should assess the potential elimination of existing (affordable) housing due to the ADU alternative proposals **and** the building of "mini-mansions". How much of the loss of housing due to mini-mansions is driving the proposals for allowing ADU's?

## **HOUSING AND SOCIOECONOMICS**

### **Comment 3. Housing Affordability**

a. The city is touting ADU's as a way to increase affordable housing. Hearsay has it that renting the units as B&B's makes more money than long-term rentals.

The EIS should address how many ADU's are used solely as Bed and Breakfast's. How much money are these B&B's making for their owners compared to ADU's being rented long term. And how does this affect the amount of affordable housing will result from allowing more ADUs.

b. If the hearsay mentioned above is true and when apartments, even ones of 345 square feet, are renting for huge sums of money, why would an 800-1000 sq. ft. ADU with more privacy than in an apartment building rent for less?

The EIS should address the potential affordability of ADUs and DADUs.

c. What's to prevent a developer buying and tearing down an existing affordable house, dumping its remains in a landfill and building 2 units attached and 1 DADU, essentially turning the lot into a triplex?

The EIS should assess this and whether it increases affordability.

## **PUBLIC SERVICES AND UTILITIES**

### **STORMWATER RUNOFF AAND SEWAGE TREATMENT**

What will be the affect of covering more surfaces that could otherwise absorb water instead of forcing it to run off to the street and therefore to the sewage treatment plant?

Homeowners are being encouraged to install water catchment basins in the parking strip or in their yard, put in rain gardens, and collect rainwater in cisterns. The parking

lot for a group of small businesses near me has a surface that allows water to pass through. This implies to me that there might be a problem with too much water running off property rather than being absorbed.

Do the lot coverage limits include driveways and walkways around and to the ADU units?

**Comment 4. The EIS should answer these questions:**

- A. What would be the consequences of covering so much land with impervious surfaces? How much would the volume increase?**
- B. Are those additional impervious surfaces included in the consideration of increased water runoff? If they aren't included, what would be the consequences of them?**
- C. Is the West Point Sewage Treatment Plant, especially following the recent flooding disaster, capable of handling the increased sewage and storm water runoff?**
- D. Are the recent upgrades to the system to handle storm water runoff robust enough to handle the further increased runoff that would come with DADU's being built?**
- E. How would building ADU's affect recharging of the groundwater?**
- F. How would the increased runoff affect the waterways and the organisms. For instance, please refer to an article in the Seattle Times.**

**Mortality of Coho Salmon?** <https://www.seattletimes.com/seattle-news/environment/stormwater-pollution-in-puget-sound-streams-killing-coho-before-they-can-spawn/>.

## **PUBLIC SERVICES AND UTILITIES**

### **Police, Fire and Emergency Services, Public Schools and Water**

- A. The Tree canopy cover in Ballard is low. Seattle City light plants trees in parking strips to mitigate for the removal of trees near power lines.
- B. What rules are in place to prevent the removal of large and/or heritage trees? Will the rules be enforced with no variances allowed? It is not sufficient to replace a mature tree with a sapling.
- c. How will removal of trees to build ADU's affect Carbon sequestration?

**Comment 5. The EIS should also address the following:**

**How will allowing more ADU's affect the Tree Canopy cover?**

**How will an increase in population in SF zones affect the ability of the city to provide public services?**

#### **4. Parking**

Parking. If you allow up to 12 unrelated individuals to live in 3 dwelling units on one lot, how many vehicles, do you predict will be owned by those individuals? I bet it's more than 4. With neighborhoods being surrounded and encroached upon by more and more apartments and "apodments" (with no parking provided) and a world class transportation system nowhere in sight, I bet there will be a parking shortage, to say the least.

**Comment 6.** The EIS should assess the availability of parking in SF neighborhoods and how it would be impacted by three living units on a lot?

#### **AESTHETICS**

Gardens, vegetation, trees, flowers, birds, animals. All one has to do is walk around the neighborhood to see how important plants and animals are to the residents. I purposely bought and have lived in a SF zone house for 32 years. I cherish my neighbors. I know people on 10 different blocks surrounding my block. I walk the neighborhood with my elderly mother to enjoy gardens, trees, birds, cats, dogs, chickens and greetings from people. I grow quarts of raspberries, 300-500 lbs of kiwis, tomatoes, beans, greens and peas, which I share.

#### **Comment 7**

The EIS should address the loss of privacy. loss of light for gardens and solar panels (shading) loss of aesthetics from houses built with flat roofs so they can maximize the square footage of their second story. Loss of Privacy, loss of light for gardens and solar energy, loss of quality of neighborhood.

---

**FOR ALL THESE REASONS AND MORE, I RECOMMEND RETAINING ADU/DADU**

**ALTERNATIVE 1**

**NOT ENOUGH INFORMATION HAS BEEN GATHERED CONCERNING THE EFFECTS OF ALTERNATIVE 1 (NO CHANGES) TO ALLOW A THOROUGH ASSESSMENT OF ALTERNATIVE 2.**